SUMMARY and FISCAL NOTE

Department:	Dept. Contact:	CBO Contact:
OPCD	Michael Hubner	Christie Parker

1. BILL SUMMARY

Legislation Title: AN ORDINANCE relating to land use and zoning; repealing and replacing the Seattle Comprehensive Plan pursuant to a major update, with new goals, policies, and elements and a new Future Land Use Map; amending Sections 5.72.020, 5.72.030, 5.73.030, 6.600.040, 22.805.070, 23.34.007, 23.34.008, 23.34.009, 23.34.010, 23.34.011, 23.34.012, 23.34.014, 23.34.018, 23.34.020, 23.34.024, 23.34.028, 23.34.074, 23.34.076, 23.34.078, 23.34.080, 23.34.082, 23.34.086, 23.34.099, 23.34.100, 23.34.108, 23.34.110, 23.34.128, 23.40.070, 23.41.004, 23.41.012, 23.42.058, 23.44.019, 23.45.509, 23.45.510, 23.45.514, 23.45.516, 23.45.527, 23.45.530, 23.45.532, 23.45.550, 23.47A.004, 23.47A.005, 23.47A.008, 23.47A.009, 23.47A.012, 23.47A.013, 23.48.002, 23.48.021, 23.48.220, 23.48.221, 23.48.225, 23.48.245, 23.48.250, 23.48.285, 23.48.290, 23.48.602, 23.48.605, 23.48.610, 23.48.623, 23.48.690, 23.48.710, 23.48.720, 23.48.723, 23.48.740, 23.48.780, 23.48.785, 23.48.802, 23.48.905, 23.48.940, 23.49.012, 23.49.019, 23.49.036, 23.50.012, 23.50A.040, 23.50A.190, 23.50A.360, 23.51A.004, 23.52.004, 23.52.008, 23.53.006, 23.54.015, 23.54.016, 23.54.020, 23.54.035, 23.58A.014, 23.58A.024, 23.58A.040, 23.58A.042, 23.58B.040, 23.58B.050, 23.58C.040, 23.58C.050, 23.69.022, 23.69.026, 23.69.035, 23.71.020, 23.74.002, 23.84A.025, 23.84A.026, 23.84A.032, 23.84A.038, 23.84A.040, 23.84A.042, 23.86.006, 25.05.164, 25.05.665, and 25.05.800 of the Seattle Municipal Code; and amending the title of Sections 23.48.230, 23.48.235, 23.48.240, 23.48.255, and 23.48.280 of the Seattle Municipal Code.

Summary and Background of the Legislation: The state Growth Management Act (GMA) requires local jurisdictions to update their Comprehensive Plans every 10 years to accommodate growth for the succeeding 20-year planning period and to update goals and policies to be consistent with the requirements of the GMA. Seattle last adopted a major update of its Comprehensive Plan in 2015.

This legislation repeals and replaces the entire Comprehensive Plan. The Comprehensive Plan for the planning period 2024-2044 (called the "One Seattle Plan") includes a revised growth strategy and future land use map that includes new and expanded areas for residential development to meet the need for housing supply and diversity. The growth strategy would continue to focus new housing and jobs within Urban Centers and Villages (renamed Regional and Urban Centers respectively). Other modifications to the growth strategy include the following.

A new **Regional Centers** section:

- Designates Ballard as a Regional Center
- Expands the boundary of the Uptown Regional Center to encompass a full half-mile walkshed around planned new light rail stations

- Expands the First Hill-Capitol Hill Urban Center to include a portion of the Squire Park area
- Updates 20-year growth estimates for Regional Centers

A new **Urban Centers** section:

- Adds a new Pinehurst-Haller Lake Urban Center around the future NE 130th St. Link light rail station
- Expands the boundaries of 8 Urban Centers to encompass areas within walking distance of light rail and to increase the size of small centers consistent with regional standards for Countywide Centers
- Divides several larger Urban Centers into multiple centers consistent with standards for Countywide Centers

A new **Neighborhood Centers** section:

- Creates a new Neighborhood Center place type defined as small areas of moderate density housing (3 to 6 stories) within a short walk (approximately 4 minutes) of an existing neighborhood commercial node and/or bus rapid transit stop
- Identifies a total of 30 new Neighborhood Centers in areas across the city
- The current South Park Urban Village is redesignated as a Neighborhood Center with an accompanying boundary change

A new **Urban Neighborhood** section:

- Merges the current FLUM designations of Single-family, Multi-family, and Commercial into a new Urban Neighborhood designation
- Urban Neighborhood includes predominantly areas zoned Neighborhood Residential, where a wider range of housing types will be allowed consistent with new state requirements in House Bill 1110 (HB1110)
- Within Urban Neighborhoods, the element also states that higher density housing may be appropriate along frequent transit arterials and in areas already zoned for higher densities

Other key changes in the One Seattle Plan are modifications to goals and policies in multiple elements to ensure compliance with state and regional policies, to support the updated growth strategy, and to promote race and social equity. A revised Transportation element of the One Seattle Plan aligns with the recently adopted Seattle Transportation Plan and includes new multimodal transportation measures. An expanded Housing element and appendix of the One Seattle Plan addresses new requirements to plan for and accommodate housing for all economic segments enacted with House Bill 1220 (HB 1220). The One Seattle Plan adds a new Climate and Environment element that responds to new requirements of GMA enacted by House Bill 1181 (HB 1181). The One Seattle Plan removes the Neighborhood Plans section of the Comprehensive Plan and includes a placeholder section for new Regional Center Subarea Plans that will be adopted in the future. The update removes the Community Well-Being as a separate element and moves many policies to other elements. Finally, the update also removes the Growth Strategy and Land Use appendices with key data now addressed in an expanded Housing appendix.

The Seattle City Council's Select Committee on the Comprehensive Plan adopted the following amendments to the legislation:

Amendment 1	Incorporate childcare into the Comprehensive Plan
Amendment 2	Add a policy to the Comprehensive Plan to support anti- displacement an equitable development pilots
Amendment 3	Amend Comprehensive Plan discussion of industrial areas to highlight importance of maritime industrial employment lands
Amendment 4	Amend the Comprehensive Plan to limit housing in the Stadium District
Amendment 5	Amend the Comprehensive Plan to support grocery stores in food deserts
Amendment 6	Amend the Comprehensive Plan to support multigenerational housing
Amendment 8	Amend the Comprehensive Plan to apply maximum parking limits in regional centers
Amendment 9	Amend Comprehensive Plan policy related to priority for freight movement
Amendment 10	Amend the Comprehensive Plan to add a policy on transit security
Amendment 11	Amend the Comprehensive Plan to revise a policy on missing sidewalks
Amendment 12	Amend the Comprehensive Plan to add a policy on transportation infrastructure
Amendment 13	Amend the Comprehensive Plan to revise a policy on electric vehicle charging
Amendment 14	Amend the Comprehensive Plan to add policies on pavement and bridge condition
Amendment 15	Amend the Comprehensive Plan to add a pothole policy
Amendment 16	Amend the Comprehensive Plan to revise policy on low- carbon/low-pollution neighborhoods
Amendment 17	Reference social housing in the Comprehensive Plan
Amendment 18	Amend the Comprehensive Plan to provide policy direction regarding housing and healthy environments
Amendment 19	Amend the Comprehensive Plan to add a goal for multi-bedroom units
Amendment 20	Amend the Comprehensive Plan to support cultural housing for seniors
Amendment 21	Amend the Comprehensive Plan to discourage concentration of human service uses
Amendment 23	Amend the Comprehensive Plan to expand policy on balancing utility infrastructure costs
Amendment 24	Amend Comprehensive Plan policies related to workforce development and economic self-sufficiency
Amendment 25	Amend the Comprehensive Plan to voice support for the smallest locally-owned businesses
Amendment 26	Amend the Comprehensive Plan to provide policy direction for sustainable public and private open space, tree, and vegetation management
Amendment 27	Amend the Comprehensive Plan to provide policy direction regarding food access
Amendment 28	Amend the Climate and Environment Element to highlight trees, bees, salmon, orca and herons
Amendment 29	Amend the Comprehensive Plan to support the development of parks in regional urban centers
Amendment 30	Amend the Comprehensive Plan to support the development of community centers in regional and urban centers

Amendment 31 Amend the Comprehensive Plan to support the creation of cultural gathering places
Amendment 32 Add a Public Safety Element to the Comprehensive Plan
Amendment 33 Amend Comprehensive Plan policies to allow taller buildings in Neighborhood Centers
Amendment 35 Rename the Endolyne Neighborhood Center to Fauntleroy and amend the boundaries
Amendment 36 Amend the boundary of the High Point Neighborhood Center
Amendment 37 Amend the boundary of the Morgan Junction Urban Center
Amendment 38 Amend the boundary of the Madrona Neighborhood Center
Amendment 40 Amend the boundary of the Ravenna Neighborhood Center
Amendment 42 Add an East Ballard Neighborhood Center
Amendment 44 Amend the boundary of the Magnolia Village Neighborhood Center
Amendment 45 Amend the boundary of the North Magnolia Neighborhood Center
Amendment 48 Amend the boundary of the Upper Fremont Neighborhood Center
Amendment 49 Amend the boundary of the West Green Lake Neighborhood Center
Amendment 51 Remove areas north of Roy Street from the Uptown Regional Center and add them to the Upper Queen Anne Urban center
Amendment 53 Threshold for pedestrian improvements in centers
Amendment 114 Rename the Judkins Park Urban Center to Central District South

On December 16, 2025, the City Council further amended the bill pursuant to Amendments A and B, which restored the boundaries of the First Hill/Capitol Hill Regional Center and set target dates for implementation of policies related to pavement conditions and bridge ratings.

2. CAPITAL IMPROVEMENT PROGRAM

Does this legislation create, fund, or amend a CIP Project? ☐ Yes ☒ No

3. SUMMARY OF FINANCIAL IMPLICATIONS

Does this legislation have financial impacts to the City? ☐ Yes ☒ No

3.d. Other Impacts

Does the legislation have other financial impacts to The City of Seattle, including direct or indirect, one-time or ongoing costs, that are not included in Sections 3.a through 3.c? If so, please describe these financial impacts.

The Comprehensive Plan is a 20-year growth management blueprint for how the City will accommodate and serve growth in the next twenty-year timeframe. This framework directs coordinated City investments in facilities and services to meet demand from anticipated growth of 80,000 households and 158,000 jobs. Growth can result in costs to serve the needs of households and businesses and it can also increase revenues due to an increased tax base. The impact of the Plan, specifically the growth strategy, is to identify where new growth will occur over time through planned land uses and densities of development. This information provides a

common framework for all, including for multiple departments, to plan for needed infrastructure and services, resulting in greater coordination and opportunities for efficiencies. The changes to the growth strategy in the One Seattle Plan also provide significant additional zoned capacity for housing development, including in new areas planned for growth, such as new and expanded centers, new Neighborhood Centers, and in all neighborhoods in the form of middle housing consistent with HB 1110. If the city grows at a rate that is higher or occurs faster than that anticipated in the Plan based on the targets adopted under GMA, additional financial impacts could result, the net impact of which is unknowable at this time.

The updated growth strategy in the One Seattle Plan includes significant changes to the Future Land Use Map (FLUM). The FLUM changes will be implemented through separate zoning legislation. Developing the zoning legislation itself is already included in OPCDs budgeted work plan. Adoption of changes to the FLUM will result in costs to Seattle Department of Construction and Inspections (SDCI) and the Seattle Information Technology department (IT) to incorporate the new map and growth strategy into mapped data that is included in or supports our land use regulations in City code. SDCI and IT will also incur indirect costs to update data related to the zoning maps that implement the growth strategy. Any additional impacts for updating data or procedures related to zoning will be addressed in fiscal notes accompanying the forthcoming rezone legislation.

If the legislation has costs, but they can be absorbed within existing operations, please describe how those costs can be absorbed. The description should clearly describe if the absorbed costs are achievable because the department had excess resources within their existing budget or if by absorbing these costs the department is deprioritizing other work that would have used these resources.

The One Seattle Plan is a policy document that informs City departments' future work plans to provide services and facilities that will support growth over time. Many of these investments will be provided within the scope of existing department operations. As noted, the One Seattle Plan provides policy direction that can result in efficiencies and coordination across departments as they plan their work. Adoption of the Plan, along with adoption of zoning legislation to implement the revised growth strategy, does not immediately result in costs to departments, other than SDCI and IT (discussed above), but will inform future budgeting to meet the needs of a growing city.

Please describe any financial costs or other impacts of *not* implementing the legislation.

There is no direct financial impact of not adopting and implementing the legislation. However, updating the Comprehensive Plan is a state requirement. If not adopted, the City could be challenged at the Growth Management Hearings Board which could result in a penalty of losing access to certain state grants and funding sources. The Puget Sound Regional Council also requires that cities maintain an updated plan to maintain access to certain federal transportation funds.

4. OTHER IMPLICATIONS

a. Please describe how this legislation may affect any departments besides the originating department.

The Comprehensive Plan provides policy direction for many aspects of City operations. Its policies affect activities conducted by the Seattle Department of Transportation (SDOT), Office of Housing (OH), Seattle Public Utilities (SPU), Seattle City Light (SCL), Office of Sustainability and the Environment (OSE), SDCI, Office of Economic Development (OED), Seattle Parks and Recreation (SPR), and others.

The Comprehensive Plan provides broad guidance to several departments that have roles in managing or serving development. To the extent that projected development would occur at a faster rate than had previously been estimated, some capital departments, such as SDOT and SPU, may experience an increased need for their services and for additional infrastructure planning.

b. Does this legislation affect a piece of property? If yes, please attach a map and explain any impacts on the property. Please attach any Environmental Impact Statements, Determinations of Non-Significance, or other reports generated for this property.

Adoption of this legislation will change the Future Land Use Map (FLUM) designation for most property outside of existing Urban Centers and Urban Villages. The FLUM establishes future land use designations that will be implemented through rezoning actions. Future rezone legislation would have to be adopted for any parcels to be directly affected.

Comprehensive Plan policies and the FLUM provide general guidance for where particular land uses and densities will be allowed in the city. Separate legislation to implement the Plan through zoning changes in areas across the city is forthcoming.

c. Please describe any perceived implication for the principles of the Race and Social Justice Initiative.

i. How does this legislation impact vulnerable or historically disadvantaged communities? How did you arrive at this conclusion? In your response please consider impacts within City government (employees, internal programs) as well as in the broader community.

Addressing race, social justice, and equity was a major goal of the Comprehensive Plan update process. OPCD used the City's Racial Equity Toolkit framework to do this work. The work involved enhanced engagement with historically underrepresented communities and a Racial Equity Analysis of the current Seattle 2035 Plan and Urban Village strategy. The Plan includes many new goals and policies in multiple elements that further race and social justice. The proposed growth strategy is expressly designed to increase housing supply to reduce market pressure resulting in displacement pressures on Black, Indigenous, and people of color and low income households. The growth strategy includes support for development of middle housing and higher densities in areas of the city that have historically been

exclusionary in their zoning. Affordable housing policies support increased production of income-restricted housing. New and expanded policies in multiple elements support efforts by the City to explicitly mitigate displacement. The Plan also includes additional analysis of historical and ongoing racial inequities, particularly as documented in the Housing appendix in response to the requirements of HB 1220. The Plan will be adopted through this piece of legislation.

The Environmental Impact Statement for the One Seattle Plan also includes an equity analysis for each element of the environment studied. Particular attention was given to how environmental impacts affect vulnerable or historically disadvantaged communities and the identification of relevant mitigation measures.

ii. Please attach any Racial Equity Toolkits or other racial equity analyses in the development and/or assessment of the legislation.

In 2021, OPCD contracted with PolicyLink, a national research and action institute, to conduct a Racial Equity Analysis that gathered community feedback on how the Seattle 2035 Comprehensive Plan and its Urban Village Strategy had met its racial equity goals and could be improved to further advance equity. The report set the stage for later work on the One Seattle Plan.

The Housing appendix in the Plan includes detailed sections on the history of racial disparities and exclusion in housing in Seattle as well as data that show ongoing racial disparities in housing that are addressed in the goals and policies in the One Seattle Plan.

iii. What is the Language Access Plan for any communications to the public?

OPCD prioritized translations of key documents across all phases of engagement in Seattle's Tier 1 languages: Traditional Chinese, Spanish, Vietnamese, Somali, Amharic, Korean, and Tagalog. During Phase 1 and 2 engagement, all Issue Briefs were translated into Tier 1 languages and Khmer. The Engagement Hub was also fully accessible in Tier 1 languages. OPCD partnered with a cohort of 10 Community Liaisons, who provided language support at in-person and virtual information sessions as well as focus groups, during formal comment periods, and during in-person open houses and information sessions. Five of our community-based organization partners conducted in-language outreach to the communities they regularly serve. OPCD offered interpreters and Community Liaisons at in-person engagement events & pop ups, such as HSD’s Age Friendly Seattle & Free Summer Meals program events and DON’s People’s Academy for Community Engagement (PACE) program events. During Phase 3 and 4 engagement, the Draft Growth Strategy Summary and the Mayor's Growth Strategy Summary were translated into Tier 1 languages. Across all phases of engagement, OPCD publicized a contact for interpretation and accessibility requests, and provided interpretation on request, including for Spanish and ASL.

d. Climate Change Implications

i. Emissions: How is this legislation likely to increase or decrease carbon emissions in a material way? Please attach any studies or other materials that were used to inform this response.

The Plan includes a new Carbon Pollution Reduction subelement that includes goals and policies to reduce carbon emissions from the following sectors: transportation, development pattern, buildings and energy, solid waste. This subelement reflects the framework of state legislation, HB 1181, passed in 2023. The subelement includes an overall goal to reduce Seattle's core greenhouse gas emissions by 58 percent from 2008 levels by 2030 and attain carbon neutrality by 2050. These goals and policies will be implemented though more specific action plans created or updated by other departments that include actions to reduce carbon emissions such as the OSE Climate Action Plan, OSE Sustainable Building Policy, OSE Urban Forest Management Plan, SCL Integrated Resources Plan, SPU Water System Plan, SPU Shape our Water Long Range Plan, SPU Solid Waste Plan, SPR Park and Open Space Plan, and the Capital Improvement Program. According to the Final Environmental Impact Statement (FEIS), the preferred alternative which, along with Alternative 5, reflects the highest level of growth among the alternatives studied is likely to increase total carbon emissions but the pattern of development in the preferred alternative results in lower per capita carbon emissions.

ii. Resiliency: Will the action(s) proposed by this legislation increase or decrease Seattle's resiliency (or ability to adapt) to climate change in a material way? If so, explain. If it is likely to decrease resiliency in a material way, describe what will or could be done to mitigate the effects.

The Plan includes a new Climate Resilience subelement that includes goals and policies to increase Seattle's resiliency to the impacts of climate change. This subelement reflects the framework of state legislation, HB 1181, passed in 2023. This subelement includes goals and policies for overall resilience planning and identifies specific strategies that will be pursued by the City related to specific impacts: extreme heat, wildfire smoke, sea-level rise, flooding, more frequent intense storms and longer dry periods. These goals and policies will be implemented though more specific action plans created or updated by other departments such as OSE Climate Action Plan, OSE Urban Forest Management Plan, SCL Integrated Resources Plan, SPU Water System Plan, SPU Shape our Water Long Range Plan, SPR Park and Open Space Plan, and the Capital Improvement Program.

The updated growth strategy included in the One Seattle Plan and adopted through this legislation was studied as the preferred alternative in the FEIS. That analysis identifies potential impacts related to climate and resiliency which can be addressed through mitigation. It identifies ways in which the strategy will enhance resiliency. For example, redevelopment would trigger the installation of newer stormwater infrastructure that can be designed to be more resilient to changes in rainfall due to climate change.

The FEIS identifies potential mitigation actions to address climate vulnerabilities and increase Seattle's resiliency. Substantial mitigation will be achieved through implementation of the strategies identified in the Climate Resilience subelement. Additional mitigation can be advanced through an update to the 2012 Climate Action Plan and updates to shorelines and environmentally critical areas regulations to reflect increased risks of sea-level rise, flooding, landslides, and other climate impacts. Potential mitigation measures include the following actions:

- Update landscaping, open space, and tree canopy requirements for new development
- Encourage attached units that result in more permeable areas for plantings
- Maintain and enhance programs to increase tree canopy, including in parks, rights-of-way, and other public lands
- Retrofit stormwater facilities to increase storage capacity and improve water quality treatment
- Update stormwater detention standards for new development
- Update requirements and programs to reduce impervious surfaces
- Support and encourage low-impact development practices
- Installation of solar (photovoltaic) and other local generating technologies
- Implementation of sustainable requirements including the construction and operation of LEED-compliant (or similar ranking system) buildings
- The use of passive systems and modern power saving units
- Implementation of conservation efforts and renewable energy sources to conserve electricity in new developments
- Investment in improved drainage and electrical utilities

e. If this legislation includes a new initiative or a major programmatic expansion: What are the specific long-term and measurable goal(s) of the program? How will this legislation help achieve the program's desired goal(s)? What mechanisms will be used to measure progress towards meeting those goals?

This legislation does not include a new initiative or major programmatic expansion.

5. CHECKLIST

☒ **Is a public hearing required?**

A public hearing will be held on this legislation.

☒ **Is publication of notice with *The Daily Journal of Commerce* and/or *The Seattle Times* required?**

☐ **If this legislation changes spending and/or revenues for a fund, have you reviewed the relevant fund policies and determined that this legislation complies?**

☐ **Does this legislation create a non-utility CIP project that involves a shared financial commitment with a non-City partner agency or organization?**

6. ATTACHMENTS

Summary Exhibits:
Summary Exhibit 1 – Racial Equity Analysis
Summary Exhibit 2 – One Seattle Comprehensive Plan Update Final Environmental Impact Statement
Summary Exhibit 3 – One Seattle Comprehensive Plan Update Final Environmental Impact Statement Appendices

PolicyLink

Advancing Racial Equity as part of the 2024 Update to the Seattle 2035 Comprehensive Plan and Urban Village Strategy

Prepared for the City of Seattle by PolicyLink[1] - April 2021

INTRODUCTION

The Seattle 2035 Comprehensive Plan update represents a transformative opportunity to guide future growth in the city in a way that substantially advances a vision where all Seattleites, regardless of their race/ethnicity, nativity, gender, or zip code, are able to participate and reach their full potential. Revisiting the comprehensive plan is particularly timely as Seattle and the rest of the country look ahead to the recovery from COVID-19. While the City has had a longstanding commitment to racial and social equity since 1994 and has made progress on many of the equitable development goals outlined in Seattle 2035, the pandemic and its impacts highlight persistent racial inequities in health, housing, and economic security. Tensions resulting from these longstanding racialized inequities came to the fore during the summer of 2020 as Black, Indigenous, and other people of color (BIPOC) in Seattle, and cities across the country, organized in protest after the murder of George Floyd. For many of these protesters, misconduct of the police towards residents of color is one facet of the systemic racism that continues to exclude and oppress communities of color. Addressing these inequities is a daunting task that is going to require the collective effort of all Seattleites.

Amidst a historic focus on racial equity in the economic recovery, and anticipating significant new federal funding for infrastructure, the Seattle 2035 update must provide the blueprint to steer investment and development in a way that makes meaningful progress toward racial equity and inclusion. The update also provides an important opportunity to acknowledge and redress past harms, including the negative impacts of prior planning and development decisions.

In advance of the update of the Seattle 2035 Comprehensive Plan, the Seattle Office of Planning and Community Development, in partnership with the Department of Neighborhoods and the Office of Civil Rights, engaged PolicyLink to:

[1] PolicyLink is a national research and action institute dedicated to advancing racial and economic equity with a focus on delivering results at scale for the 100 million people in the United States living in or near poverty. PolicyLink takes an “inside-outside” approach to policy change, working with grassroots advocates focused on economic and racial justice, as well as with policymaker and government champions, to achieve equitable policies.

- Conduct a racial equity analysis of the comprehensive plan;
- Review a compendium of reports highlighting quantitative data on recent patterns of growth and equitable development outcomes;
- Analyze findings from five focus groups of residents discussing challenges and opportunities facing people of color as a result of the City's urban village growth management strategy;
- Engage with community stakeholders and leadership from multiple City departments in a Workshop on Racial Equity in the Seattle Comprehensive Plan and Urban Village Growth Strategy (held on October 29, 2020);
- Identify promising practices other jurisdictions are implementing to achieve more racially equitable outcomes; and
- Make recommendations to the City as it prepares to launch the plan update in 2021.

The following report includes four sections:

1. *Equity in Seattle's Comprehensive Planning Efforts* grounds the comprehensive plan update in the City's 25+-year history of equitable planning efforts.
2. *Centering Race and Acknowledging Past Harms* elevates the importance of acknowledging commitment to redress past harms and outlines the historical planning and land use decisions that created the current landscape of housing opportunity.
3. *Inequitable Outcomes for BIPOC Communities* summarizes key observations and data on racial equity outcomes since the 2016 adoption of Seattle 2035.
4. *Recommendations for a More Equitable Comprehensive Plan Update* presents our recommendations on how the comprehensive plan update can best address inequities and build a more equitable future, including ensuring meaningful community engagement in the update.

I. EQUITY IN SEATTLE'S COMPREHENSIVE PLANNING EFFORTS

The Seattle 2035 update will build upon decades of groundwork. Seattle's first comprehensive plan, released in 1994, launched the urban village strategy. By focusing growth in urban villages and centers, the city seeks to promote walkable access to neighborhood services, more efficiently serve residents with public transit, strengthen local business districts, and support climate resiliency by reducing greenhouse gas emissions. The plan has been effective how and where the city has grown: Since 1995, the share of the city's housing growth going to urban villages has steadily increased, while the share of development outside of centers and villages has declined.[i]

Seattle created the Race and Social Justice Initiative within the Office for Civil Rights (OCR) in 2004 with a focus on eliminating institutional racism within city government. The City's Race and Social Justice Initiative (RSJI) envisioned that all policies and practices yield a future where:

- Race does not predict how much a person earns or their chance of being homeless or going to prison;
- Every schoolchild, regardless of language and cultural differences, receives a quality education and feels safe and included; and
- African Americans, Latinos, and Native Americans can expect to live as long as white people.

Seattle 2035 codified the City's commitment to racial and social equity as core values, which are reflected in the plan's policies and growth strategy. To shape development of the plan, the city council passed Resolution 31577 directing City staff to make the racial equity more visible in the plan introduction, core values, goals and policies; and to incorporate a growth strategy equity analysis and equity metrics. The city incorporated a racial equity analysis of the draft Comprehensive Plan and developed a Displacement Risk Tool and Access to Opportunity Tool to better understand the landscape of threats and assets facing low-income and BIPOC residents in different neighborhoods across the city. A framework for implementing the goals of the plan and advancing racial equity and inclusion was formalized with the creation of the Equitable Development Initiative (EDI) in 2016. EDI supports neighborhood leaders and community-based organizations, including grants and other assistance, in advancing equitable access to housing, jobs, education, parks, healthy food, and other amenities and in mitigating displacement.

II. CENTERING RACE AND ACKNOWLEDGING PAST HARMS

For Seattle to achieve the desired impact of advancing racial equity, the City must first address the lingering impacts of past injustices. The urban village strategy has not been able to mitigate the displacement of BIPOC residents because it perpetuates a land use and zoning policy that was specifically designed to limit their housing options. To move beyond tinkering at the margins of equitable neighborhood change, city leaders should embrace a reparative framework that specifically addresses the root causes of housing insecurity for BIPOC Seattleites. This entails an intentional focus on updating the Comprehensive Plan in conjunction with equitable policies that center the voices and agency of the most marginalized.

Many of the economic and housing inequities we see today can be traced to past public sector policies and programs and private sector practices. The Seattle Planning Commission and others have documented the impact that policies such as the G.I. Bill, Federal Housing Administration lending practices, and racially restrictive covenants have had on Seattle's neighborhoods to this day, which are summarized below.

Starting early in the 20th Century, racist developers and city planners in cities across the country began to institute racial zoning ordinances forbidding people of color from living in or buying homes in white neighborhoods. This trend accelerated with the Great Migration of African Americans from the south to industrial cities in the northeast and midwest. Baltimore enacted the first racial zoning ordinance in 1910, and within several years the practice was widespread

in the region. Racial zoning was outlawed in 1917 when the U.S. Supreme Court declared that a Louisville, Kentucky racial zoning ordinance was unconstitutional in *Buchanan vs. Warley*.

Following the ban on racial zoning, developers began using racially restrictive covenants to prohibit homeowners in a designated neighborhood from selling their home to people of color. These neighborhoods became and remained almost exclusively white, shutting people of color out from the economic opportunity to build wealth as property values increased. Restrictive covenants were struck down by the Supreme Court in 1948 in *Shelly vs. Kraemer,* and eventually outlawed by the Fair Housing Act of 1968.

With the passage of the Fair Housing Act of 1968, developers and city leaders found alternative ways to leverage land use regulations to benefit from racial segregation. Local governments expanded the use of exclusionary residential zoning to keep out low-income people of color since single-family zoning mandates a minimum parcel size for single-family homes that are typically unaffordable to low-income people of color. At the same time, communities of color were zoned as commercial, industrial, or mixed-use, fueling the concentration of environmental hazards in these neighborhoods.

This push for local governments to establish single-family zoning regulations was largely driven by real estate developers and was in part an effort to institutionalize the same discrimination previously codified in restrictive covenants. Real estate developers, often seeking to develop large tracts of dozens or hundreds of homes, feared that the allowing people of color to move into the neighborhood would lower the sale prices of the homes.[ii] Many developers were not in favor of policies that facilitated residential mobility for African Americans because it prompted wider readjustments of property values in White neighborhoods. Developers sought to minimize these readjustments and maximize profits and the Federal government was complicit by refusing to insure projects that lacked racial deed restrictions. Research from the University of Washington confirms that restrictive covenants have left a lasting impression on the availability of housing opportunities for low-income people of color in Seattle.[iii] For example, due to restrictive covenants, households of color were unable to gain access to mortgage financing and, as a result, the wealth building opportunity of homeownership. This effectively limited their financial ability to move into a more desirable neighborhood even after the racially exclusionary zoning and restrictive covenants were eliminated.[iv]

Redlining has also been proven to have had long-term deleterious consequences for Black Seattleites. The term redlining can be traced back to the color-coded maps used by the Home Owners Loan Corporation (HOLC) to guide Federal Homeowners Association (FHA) lending practices. The dramatic increase in homeownership and concomitant expansion of the American middle class in the mid-20th would not have happened without the FHA and the advent of their 30-year mortgage product.[v] However, the FHA and HOLC defined Black residents as an “undesirable population” and refused to issue loans to residents in these neighborhoods. To be clear, federal policy created a pathway to homeownership, the middle class, and intergenerational wealth for White households that was unavailable to Black households.

The cumulative impacts of restrictive covenants, racist lending practices, and exclusionary zoning have become entrenched and continue to impact many Seattle households of color. Research has confirmed that many of the same Seattle neighborhoods where BIPOC residents currently face the largest threat of displacement were once deemed "undesirable" by HOLC over 80 years ago.[vi] These neighborhoods were once comprised by BIPOC residents due to the segregation perpetuated by redlining that limited the availability of housing options elsewhere in the city. These limited housing options also contributed to the racial wealth gap in the city by creating a disproportionate share of BIPOC residents that are renters rather than homeowners. Zoning and land use decisions continue to uphold segregation and perpetuate a racialized threat of displacement. With 75 percent of residential land excluded from accommodating more affordable housing types, low-income BIPOC residents are left confined to certain sections of the city competing for limited affordable housing opportunities. Accordingly, despite the advent of the Race and Social Justice Initiative, and the good intentions behind the urban village strategy, the approach has not achieved its goals because it ultimately perpetuates the same housing insecurity of low-income BIPOC residents that has been in place for years.

It is important to acknowledge the historical succession of racialized policies and practices which not only reflect the institutional racism in this country rampant at that time, but also help to perpetuate racial and economic segregation to this day. As low-income residents and people of color continue to struggle to access neighborhoods of opportunity or enjoy stability in their cultural communities, their ability to achieve intergenerational economic mobility is stunted. Homeownership and education provide two examples. Research has confirmed that children of homeowner parents are more likely to own a home and thereby have a vehicle to accrue wealth.[vii] Those households with access to homeownership in prior years are able to financially benefit from increasing property values in the city. At the same time, while the cost of ownership housing in Seattle has made homeownership out of reach for many low-income people and people of color, rising rents have exacerbated housing insecurity for renters. Education has long been considered "the great equalizer" because of its potential to advance intergenerational economic mobility.[viii] However, recent research has confirmed that the ability to access a high-quality education varies across Seattle, with students in wealthier districts benefitting from additional teachers and other resources unavailable to low-income students in other districts.[ix] Many of the high-performing schools are in the single-family neighborhoods that BIPOC families were unable to access in the past due to redlining and restrictive covenants. Low-income BIPOC households continue to struggle accessing these neighborhoods due to the lack of affordable housing options available. A national analysis of "greenlined" neighborhoods (e.g. deemed "Best" or "desirable in HOLC maps) found that they remain more than 70 percent White.[x] As a result, the same low-income families of color harmed by redlining and restrictive covenants in the past continue to suffer from housing insecurity and remain locked out of wealth-building opportunities that could lead to greater economic mobility for future generations.

III. INEQUITABLE OUTCOMES FOR BIPOC COMMUNITIES

While the City has taken several laudable steps toward fostering equitable community development, an analysis of racially disaggregated data, five focus groups with residents, and a focused discussion with over 80 city leaders indicate that there are some areas of the comprehensive plan where efforts are underperforming. Key challenges include the following:

There are insufficient housing options available that are affordable to low-income families. A primary goal of the urban village strategy is to confine growth to areas of the city that are well served by transit, and dense enough to absorb new development. This approach has worked to focus new development without inhibiting growth: the City is already well ahead of the growth projections in Seattle 2035. Despite this surge in production, housing prices and rents have continued to rise, especially for larger units. The lack of affordable units is particularly harmful for Black residents in the city given the disproportionate share of Black households that are low-income and housing cost burdened.

Residents of color disproportionately face housing insecurity and risk of displacement. Seattle's overall population has grown in recent years, but the share of the population that is people of color has not kept pace. Between 1990 and 2010, the population of color in the larger metro area increased much more dramatically than it did in the city of Seattle. In addition, Seattle's Assessment of Fair Housing also indicates that between 2000 and 2010, the number of children of color in Seattle increased by only 2% compared with 64% in the balance of King County. There are a number of possible reasons for these demographic shifts. However, the difficulty households of color in Seattle face in finding quality, affordable housing is likely a contributing factor. Twenty-two percent of households of color in Seattle are paying more than half of their income towards housing costs. Focus group participants intimated fear of residential, commercial, and cultural displacement as growing numbers of their neighbors and local small businesses become priced out of gentrifying neighborhoods.

The share of BIPOC Seattleites that are homeowners is declining. The high cost of housing in Seattle is negatively impacting the ability for low-income people and people of color to become homeowners and build wealth. Focus group participants lamented the decline in homeownership among BIPOC Seattleites. The share of Black Seattleites that are homeowners is at the lowest point in 50 years.[xi] The National Equity Atlas reveals that the Black homeownership rate shrunk from 37 percent to 24 percent between 1990 and 2017.[xii] The City's Housing Choices Background Report confirms that "owning a home in Seattle is no longer affordable to the vast majority of people who live and work here."[xiii] This makes it disproportionately difficult for low-income BIPOC households to access homeownership and achieve intergenerational economic mobility.

People of color are struggling to access opportunities afforded to residents of single-family neighborhoods. The City's Equitable Development Implementation Plan states that "Seattle's

communities of color tend to live in neighborhoods with low access to opportunity, leaving many without access to resources necessary to succeed in life."[xiv] This assessment is based the Access to Opportunity index which measures key determinants of social, economic, and physical well-being such as quality of education, civic infrastructure, transit, economic opportunity, and public health. In addition to the Access to Opportunity index findings, the Assessment of Fair Housing indicates that the racially or ethnically concentrated areas of poverty (R/ECAPs) in the city include disproportionate rates of people of color, foreign born people, families with children, and people with disabilities. Finally, focus group participants underscored the need to desegregate neighborhoods with high-achieving schools.

There is an insufficient number of units affordable and available to large families. Only two percent of rental units in Seattle have three or more bedrooms.[xv] Seattle's Assessment of Fair Housing confirms that "the disproportionately high rate of housing problems experienced by large families indicates significant unmet housing needs among these households." For example, limited housing options leaves larger families with greater likelihood of living in areas with higher poverty exposure.[xvi] The need for larger units is acute for immigrant families and other households of color, who are often supporting, housing, or cohabitating with an extended family network.

People of color have longer commute times than their White counterparts. A core element of the urban village growth strategy is that development is directed toward light rail and other public transit options. In many regards the City has been successful in providing more frequent service. The share of housing units in the city with access to transit running every 10 minutes or more frequently increased by 13 percentage points between 2016 and 2017. Based on the reporting from the Equitable Development Monitoring Program and feedback from focus group participants, residents of color in Seattle have longer commute times than their White counterparts. In addition, the neighborhoods with the highest number of jobs accessible via public transit have very few market-rate units affordable to low-income families.

There is a need for more accessible workforce training and apprenticeships. – The Seattle 2035 Comprehensive Plan projects that Seattle will grow by 115,000 jobs by 2035.[xvii] As documented in the Urban Village Monitoring report, growth since 2015 has exceeded projections, with one-fifth of the anticipated job growth for the entire 20-year period achieved in one year. Low-income and BIPOC residents have been unable to take advantage of much of this job growth.[xviii] Lack of available jobs and barriers obtaining existing jobs were recurring themes in focus group discussions. This aligns with research indicating the unemployment rates for Black and Native American workers is more than twice that of their white counterparts.[xix] Similarly, BIPOC residents explicitly expressed the need for more middle-wage job opportunities, apprenticeships, and pathways to positions in technology and other growing sectors during focus groups and other community meetings held to inform the comprehensive plan update.

RECOMMENDATIONS FOR A MORE EQUITABLE COMPREHENSIVE PLAN UPDATE

There are a number of ways that Seattle City leaders could use the Comprehensive Plan update process to advance racial equity goals. The section below highlights several priority areas to address in the update process, incorporate in the updated Comprehensive Plan, and/or address through implementation actions, and the evaluation of the plan.

To implement a more equitable growth strategy, city leaders should adhere to the following principles for an equitable Comprehensive Plan:

1. **Think beyond the limits of the plan to create longer-term institutional infrastructure for equity.** Seattle 2035 is not a panacea that will solve every challenge facing BIPOC residents. However, it does represent an opportunity for the city to proactively coordinate across departments and partner with residents and community-based organizations to develop a suite of policies and programs that will guide the growth resulting from the plan. Such structures could become expanded institutional infrastructure and capacity to advance equity. This aligns with a recommendation PolicyLink staff made in 2015 to "set a cross-department table for addressing implementation".
2. **Identify and support a pipeline of resident leaders for co-creation throughout the life of the plan.** The extensive community engagement that informed the last Comprehensive Plan update is well documented. The Community Liaisons program is an encouraging example of this principle in practice. Implementing an equitable growth strategy will require frequent and open dialogue with residents, particularly those from underrepresented groups such as immigrants, youth, and those with limited English proficiency. Training, technical assistance, and/or supplemental education may be necessary to ensure that residents are prepared for fully informed decision making.
3. **Maintain a focus on population level outcomes.** Improved conditions for low-income and BIPOC residents will not be achieved with a cookie cutter approach. The needs and barriers to success vary across groups. Strategies for leveraging future development to achieve equitable goals should focus on achieving results at scale.
4. **Use disaggregated data to develop tailored equity approaches that reach marginalized groups and measure success.** Access to racially disaggregated data at a range of levels is critical (e.g. household, neighborhood, and citywide).

Racially inclusive approach to reform of single-family zoning

A major equity challenge for the urban village strategy is that it is used as a rationale for continuation of exclusionary planning practices that have shaped Seattle. Specifically, while the City has recently taken steps to allow more forms of accessory dwelling units (ADUs), the urban

village approach continues to reinforce the exclusion, generally, of everything except single-family residential construction on 75 percent of the residentially zoned land in the city. Given its racist origins, single-family zoning makes it impossible to achieve equitable outcomes within a system specifically designed to exclude low-income people and people of color. In order to advance racial equity at the scale codified in Resolution 31577, the City must end the prevalence of single-family zoning. This will not only create much-needed additional housing opportunities in high opportunity neighborhoods for low-income residents, is also a reparative approach with the potential to create intergenerational economic mobility for BIPOC Seattleites. Eliminating single-family zoning will not automatically or immediately incentivize the development of affordable housing. To encourage property owners to develop additional units on upzoned land, incorporating a split rate tax policy could be useful. A land value tax charges a higher rate on land and a lower rate on structures, making it in the property owners' best interest to spread that cost across units. This approach has been found to incentivize owners of expensive land with low-density structures.[xx] Similarly, factory-build accessory dwelling units have been found to reduced labor and material costs and shorter construction timelines that make their use more affordable.[xxi]

Achieving the goals of the RSJI will require a fundamental shift in how the City approaches land use and zoning. When 75% of residential land is reserved for single-family housing, the remaining 25% of land will continue to foster demand at prices unaffordable to low-income families. As the City launches the next Comprehensive Plan update, leaders should adopt a land use vision and regulations that center housing security and affordability for current and future BIPOC communities, with access and choice in neighborhoods of opportunity and bridges to homeownership and wealth building. This requires identifying and addressing the barriers preventing low-income BIPOC residents from achieving these goals.

A recurring theme across focus groups and the 10/29 workshop was the need to increase access to opportunity and economic mobility for BIPOC residents. The City should explore the best combination of financial and regulatory incentives, penalties, and technical assistance necessary to generate additional housing opportunities for low- and moderate-income households in neighborhoods currently zoned for single family residences. As the comprehensive plan strategically guides more growth in these neighborhoods, the City can develop policies and programs to ensure that any new development advances racial equity goals. The Comprehensive Plan should include a policy framework for such development, embedded in a growth strategy that recognizes key neighborhood differences. The strategy could be developed to have disparate impact in certain neighborhoods based on market viability or to promote integration and anti-displacement. Implementation of the strategy through zoning code, for example, could leverage development with incentives, such as:

- Minimum/maximum lot size allowed for conversion or new construction
- Permissibility of interior, attached, or detached development
- Gross floor area allowed

- Number of units allowed per lot
- Parking requirements
- Owner occupancy requirements
- As of right vs permitted
- Public hearing
- Amnesty of existing illegal ADUs
- Inspection fees

These leverage points could be used to incentivize participation in City programs that advance racial equity using a range of existing subsidies such as CDBG funds, HUD Section 3, or SBA 7A funds. This approach, which can be applied in the context of a range of infill housing types including but not limited to ADUs, has already been implemented in several smaller cities such as the following:

- Affordable housing - The town of Barnstable, MA instituted an amnesty program and limited eligibility to owner-occupants. The property owner must agree to rent to low-income tenants for a minimum of one-year term lease. The City incentivized participation by waiving inspection fees, using CDBG funds to reimburse homeowners for eligible costs associated with the rehabilitation of any unit rented to a low-income family, and tax relief to offset the negative impact of deed restrictions that preserve the affordability of the unit.
- Apprenticeships – The City of Santa Cruz updated their comprehensive plan to allow ADU construction and eliminate parking requirements. They concomitantly promote a wage subsidy program for licensed contractors that hire apprentice workers to help build ADUs.

Increase the supply of affordable housing, particularly units that are community-controlled with long-term affordability provisions.

The affordable housing shortage in Seattle has reached a crisis level. The private market is ill-equipped to generate housing opportunities affordable to low-income households. The most common subsidies used to support affordable housing development typically expire within 30 years, creating a new crisis as advocates scramble to find resources to preserve these units. The City can take steps to increase the supply of long-term affordable units while also supporting the agency and community voice of BIPOC leaders. As one example:

- Expand and replicate support for community land trusts such as Africatown - Community land trusts promote lasting affordability and community control of land. They differ from traditional housing non-profits in that they separate the ownership of land from the ownership of housing and are governed directly by community members. The City should prioritize community land trusts as part of the disposition strategy for publicly owned/surplus land. This may require allocation of additional resources for capacity building, technical assistance, and/or robust community engagement. City

leaders should consider developing a fund to support the acquisition of units with expiring affordability requirements that could be used for community land trusts or other cooperative homeownership models, along with affordable homeownership opportunities in neighborhoods currently zoned for single-family homes.

- Explore opportunities to advance equitable transit-oriented development (eTOD) – Transit-oriented development (TOD) is a planning and design approach that encourages compact, mixed-use, pedestrian-oriented neighborhoods around new or existing public transit stations. The high demand for TOD housing adjacent to transit can make homes inaccessible to people with lower incomes, while the rapid increase in property values spurred by new transit investments can lead to gentrification and the displacement of low-income BIPOC residents. Equitable transit-oriented development refers to TOD efforts undertaken with an explicit commitment to achieve equity goals through dedicated strategies that ensure low-income residents and residents of color benefit from – and are not displaced by – the new development. For example, eTOD entails a commitment to affordable housing, and that all transit modes are prioritized such that bus-service to transit-dependent communities isn't cut in order to support a new light rail service.[xxii] In addition, the City should require local/targeted hiring of residents and support "last mile" infrastructure that allows for efficient and effective connections between transit and home for resident. The Comprehensive Plan should replace the current definition of "transit-oriented communities" in the glossary, and the two references in the Land Use section, with language that describes eTOD to establish a benchmark for developers to follow.

Acknowledge and redress past harm

There are several ways that Seattle could advance a reparative framework as part of the Comprehensive Plan update:

- Identify and protect places of significant cultural importance – While fear of residential displacement was a core challenge expressed by focus group participants as well as those at the 10/29 workshop, the erasure of the long-time cultural identity of certain neighborhoods was also elevated as an issue that needs to be addressed. As noted in the workshop, the goal should be "not just avoid displacement, but also make Seattle a place where BIPOC folks want to live, can afford to live, feel welcome and comfortable." Preserving cultural institutions such as the East African Community Center will help to accomplish this. Other cities have successfully employed this strategy. For example, Austin, TX has launched a Cultural Asset Mapping Project through a partnership between their Cultural Arts Division and Economic Development Department to document the places and resources that are important to the creativity and cultural identity of the city.[xxiii] The resource was developed through extensive community engagement in each city council district. Seattle could develop a similar list of sites that

could be included as an Appendix to the Arts and Culture element of the Comprehensive Plan, helping to inform decision-making around the future those sites.

- Revisit community preference policy – City data confirms that the urban village strategy is guiding development in a way that exacerbates housing insecurity for low-income BIPOC residents. The limited availability of developable land raises housing costs to a price point unaffordable for many of these households. Seattle has instituted a community preference policy, but the legislation is currently voluntary, only available to development in areas facing displacement, and solely intended for nonprofit affordable housing providers. City leaders should ensure the plan broadly supports community preference tools and the City should explore the viability of expanding the policy to support low-income BIPOC residents that are housing insecure but may want to live in lower-density neighborhoods.
- Institute a zoning overlay that promotes homeownership among BIPOC residents in formerly "greenlined" single-family neighborhoods. The lingering impacts of redlining in Seattle are well documented. The update of Seattle 2035 offers an opportunity to help redress some of these harms. As city leaders revisit the proliferation of single-family zoning in the city, steps should be taken to better integrate the neighborhoods that have been out of reach for BIPOC homeowners. This could be accomplished with passage of a Community Opportunity to Purchase (COPA) policy similar to the one recently passed in San Francisco. This policy requires that homeowners within the overlay area notify a pre-defined list of community-based organizations when they plan to sell the property. While COPA is typically used for multifamily buildings, the approach could be useful in providing community-based organizations with a level playing field in purchasing homes in hot market neighborhoods. With an upzoning, this process could result in multiple housing opportunities on the same lot. Community development corporations may need additional resources and training to implement a targeted acquisition strategy. The Cleveland Housing Network (CHN) has been able to develop almost 2,200 homeownership units with Low-Income Housing Tax Credits using a 15-year lease-to-own model.[xxiv] To support CDCs in acquiring additional resources and technical assistance, the City could develop a local CDC-tax credit program similar to the one used in Philadelphia, PA. Instead of paying the local Business Income and Receipts tax, qualifying businesses are able to make a contribution to a CDC and receive credit against taxes due to the city revenue department.

  Develop an approach for providing reparations to BIPOC Seattleites – Jurisdictions across the country are beginning to acknowledge the root cause of many racialized disparities facing BIPOC can be traced back to the negative economic impacts of government policies and programs. Several of these jurisdictions have committed to determining the optimal amount and approach for issuing compensation for these injustices. For example, in July 2020, the Mayor of Providence, RI began a multi-step process towards determine what form of reparations the city will take.[xxv] Similarly, the

City Council of Asheville, NC unanimously passed a resolution acknowledging systemic racism and committing to " a process to develop short-, medium-, and long-term recommendations to specifically address the creation of generational wealth and boost economic mobility and opportunity in the Black community."[xxvi]

- Redirect tax revenue to a reparations fund for BIPOC residents – The deleterious impacts of land use and zoning decisions goes beyond housing. One of the negative outcomes of the racially driven segregation of Seattle neighborhoods, is that low-income communities of color continue to face excessive contact with the police. Since the 1980s, the War on Drugs has been disproportionately waged in low-income BIPOC communities, despite no empirical evidence that people of color use drugs more than any other group. As a result, there has been disproportionate incarceration of BIPOC residents, with intergenerational impacts on households in these neighborhoods. Evanston, IL opted to leverage the legalized cannabis industry in Illinois in order to create a fund that will begin to address some of these disparities.[xxvii] Similarly, Oakland, CA has created an equitable licensing program that prioritizes individuals that were previously incarcerated for nonviolent drug offenses.[xxviii] Reparations for Seattle's BIPOC communities could also take the form of preserving or rehabilitating culturally significant sites.

Foster an equitable workforce ecosystem

City leaders should consider better coordinating workforce training with the economic development priorities for future growth. For example, if the City anticipates further growth of tech employment under the current comprehensive plan, then the Racial Equity Committee of the Workforce Development Council of Seattle-King County is well-positioned to ensure that federal Workforce Innovation and Opportunity Act (WIOA) funds are used to develop "earn and learn" training opportunities which have been found to be particularly impactful for BIPOC workers.[xxix] The Comprehensive Plan can and should support such efforts.

The Urban Village Monitoring Report has two key indicators regarding employment: employment growth in the city as a whole by sector; and distribution and rates of employment growth by Urban Center and Hub Urban Village. While these indicators help to illustrate the supply of jobs in the city, they do not convey the rate that low-income people and people of color are able to obtain these jobs, or whether the jobs pay a family-sustaining wage. A more complete understanding of the equity outcomes related to economic growth would benefit from such data. This should also include the number of living wage jobs created as a result of City investments, such as the number of jobs created going to local residents, low-income residents, or residents of color as a result of public investments such as the Housing Levy or Multifamily Tax Exemption. While tracking such data would require developing new systems of engagement and accountability for developers, there is precedent. For example, the City already has access to contractor payroll information to ensure compliance with prevailing wage,

Davis Bacon, and HUD Section 3 projects. The current payroll tracking system could be adapted or mined for relevant data to better track the workers on projects also receiving city subsidy.

Increase resident power and voice in the development and investment process

A core element of any racial equity effort, especially with a strong focus on anti-displacement and community underinvestment, is to amplify the voice and leadership of BIPOC residents. There are several ways that City leaders can proactively address these threats, which are described below, with examples from other cities. The Comprehensive Plan update should, where appropriate, include policies that support adoption of tools like these.

- Tenant Opportunity to Purchase (TOPA) policies provide tenants living in multi-family buildings with advance notice that the landlord is planning to sell their building and an opportunity for them to collectively purchase the building. These policies generally require landlords to provide an intent to sell notice to their tenants, along with a timeframe for the tenants to form a tenant association and express interest in purchasing the units, and an additional timeframe for the tenants to secure financing. By providing renters with the right to negotiate and collectively bargain to purchase their buildings, TOPA policies level the playing field in highly speculative markets such as Seattle. TOPA was first enacted in Washington, DC in 1980 and is the nation's oldest and most comprehensive policy.[xxx] From 2002 to 2013, DC's TOPA helped preserve close to 1,400 affordable housing units and keep thousands of long-time, low-income residents in their homes.[xxxi] Tenants can purchase units individually, turning units into condos, or collectively if they form a tenant association and in partnership with a developer. Additionally, the District can acquire housing through the District Opportunity to Purchase Act (DOPA) to preserve affordable housing and address at-risk housing in need of serious repairs.
- San Francisco opted to develop a Community Opportunity to Purchase Act (COPA) which gives nonprofits a first right of purchase, allowing landlords to sell at market rate to nonprofits. Due to San Francisco's inflated property costs, many tenants are unable to secure enough funding to purchase a property on their own through a TOPA policy. Nonprofits could purchase housing but struggle to compete with private purchasers ready to pay in cash. COPA addresses these challenges by requiring landlords to notify affordable housing nonprofits from a qualified list when their building goes up for sale. The policy also includes a financial incentive to property owners to sell to nonprofits by exempting sites valued at $5 million or more from paying a portion of the local property transfer tax. San Francisco fortified their COPA policy by instituting the Small Sites

Program which provides loans to nonprofit organizations, to buy buildings before an investor does. The buildings are then converted to permanently affordable housing.

- In addition to the above strategies designed to protect residents of existing units, robust community benefits agreements (CBA) should be employed by the City for large commercial and multifamily market rate developments to generate resources for affordable housing and opportunities for economic inclusion. Similar City programs such as Mandatory Housing Affordability and incentive zoning efforts, which contribute to the affordable housing stock, do not advance inclusive economic development through employment, apprenticeships, or support for BIPOC-owned businesses in the way that CBAs have historically been used. CBAs are typically driven by coalitions of residents and advocates. However, municipalities can help foster an hospitable environment in which these coalitions can operate. For example, in 2004 the Board of Aldermen in New Haven, CT passed a resolution strongly encouraging developers to enter into CBAs and emphasizing that the city would consider CBA efforts when considering projects for approval.[xxxii] in 2016, Facebook entered into a CBA with a community coalition in East Palo Alto, CA, regarding a major office expansion. The CBA requires Facebook to provide nearly $20 million toward a fund to be used for affordable housing in the region. This fund was soon leveraged to include approximately $60 million of additional funds, to be expended on the same terms. The CBA also provides funding for other issues of community concern, including legal support for tenants and policy advocacy campaigns. Similarly, in 2018, Nashville-based community coalition Stand Up Nashville negotiated a CBA to accompany a proposed soccer stadium. The CBA contained requirements for living wage jobs, first-source hiring, affordable housing, a child-care center, and other community benefits.
- Participatory budgeting is an approach to governing that allows residents to decide how public tax dollars will be used. The process is particularly inclusive as participation can include groups that might not otherwise be able to contribute such as renters, youth, returning citizens, and undocumented workers. Engagement of these groups is key as research confirms that white, male homeowners are the most likely to share comments at zoning and planning meetings.[xxxiii] The City of Chicago utilizes participatory budgeting to allow residents from the West Humboldt Park neighborhood to steward the funds collected through a tax increment finance (TIF). In 2018, this amounted to $2 million exclusively directed by neighborhood residents.

CONTINUE TO INVEST IN BIPOC RESIDENT LEADERS TO CO-CREATE A MORE EQUITABLE PLAN

The Seattle 2035 Comprehensive Plan already codifies the importance of robust community engagement. The Community Well-Being and Community Involvement elements reflect a commitment to supporting all Seattleites, especially marginalized communities that are most impacted by City policies, as the city grows. Following the 2015 Comprehensive Plan update, the City documented their outreach strategies and accomplishments in *Community*

Engagement Final Report. The report highlights extensive engagement efforts in neighborhoods and citywide over a two-year period. More than 1,000 residents participated online, roughly 2,600 people met in-person, and more than 2,100 shared their feedback on the plan via a written survey.[xxxiv] The targeted approach delineating audiences that are already active from traditionally under-represented groups, millennials, and parents of young school aged children facilitated the strategic use of City resources. A similar approach should be employed with the forthcoming plan update. There is value in ensuring that as many Seattleites as possible are aware of the update and understand how they can participate.

To achieve the equity goals enumerated earlier, the city will need to rely on an ecosystem of more deeply engaged residents. For example, Seattle has over 70 boards and commissions on which residents can apply to participate. Similarly, the Public Outreach and Engagement Liaisons (POEL), also known as the Community Liaisons program pays residents on a contract basis to organize community meetings, recruit participants, and connect them to resources such as utility payment assistance, transit passes for low-income riders, and affordable kids summer camp.[xxxv] As the City pursues citywide community engagement strategies, they should expand the Community Liaisons program to ensure that there is a pipeline of BIPOC resident leaders of a range of ages, and across neighborhoods that is adequately trained to support ongoing outreach once the updated plan has been adopted. To optimize the investment in capacity building, recruiting youth and young adults should be prioritized.

Conclusion

In conclusion, the City of Seattle and King County continue to be seen as national leaders in embracing the principles and values of equitable development. However, feedback from residents and city leaders, and racially disaggregated data confirm that Seattle still has a long way to go. The 2020 Comprehensive Plan update is an opportunity for the City to fully lean into its racial equity goals and address the remaining gaps facing low-income people and people of color. There is already tremendous work happening across the city to build on for this next phase. The observations shared above offer perspective on ways for City leaders to use the Seattle 2035 update as a vehicle for accomplishing their shared goal of advancing equitable development. With a vigilant focus on uplifting the most vulnerable, vesting residents with sufficient power and community voice, and tracking the right indicators, the City has the potential to achieve its goal of ensuring that all Seattleites are able to thrive and reach their full potential.

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Seattle

One Seattle Comprehensive Plan Update

Final Environmental Impact Statement

January 2025

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Office of Planning &
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January 30, 2025

Dear Community Members,

This City is pleased to release the Final Environmental Impact Statement (FEIS) for the One Seattle Comprehensive Plan Update. The proposal evaluated in the FEIS includes:

- Amendments to the Comprehensive Plan goals, policies and the Future Land Use Map (FLUM) that direct where growth will occur over a twenty-year planning horizon (through 2044) to accommodate between 80,000-120,000 new dwelling units and 158,000 new jobs and directs associated investment in city facilities and services to accommodate such growth.
- Zoning changes to implement the amendments to the Comprehensive Plan goals, policies and the FLUM.
- Amendments to development standards or new development standards to implement the Comprehensive Plan changes including amended FAR, lot coverage, structure height, setbacks among other standards to implement HB 1110.

Seattle last engaged in a citywide process to update our Comprehensive Plan nearly a decade ago. This update provides an opportunity to address persistent and emerging challenges: racial equity, housing costs, access to economic opportunity and education, climate change, and more.

The City is required to prepare an EIS to carefully evaluate potential environmental impacts of the actions we are considering. We have evaluated options that could change the amount, location, and type of housing to meet expected future growth and ongoing challenges around housing unaffordability and displacement. These options could also shift the location of jobs, services, and amenities, as well as transportation patterns. This FEIS covers a wide range of topics including impacts to earth and water quality, air quality and emissions, plants and animals, energy and natural resources, noise, land use patterns, historic resources, population, employment, housing, transportation, public services, and utilities. Throughout our analysis, we apply a particular focus on opportunities to address equity and climate change.

In March of 2024, OPCD released a Draft EIS and asked for your review and comments. The Draft EIS studied five alternatives at a programmatic level, illustrating different growth strategies to meet the City's projected growth allocation. Alternative 1 was a No Action

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alternative that is required by the State Environmental Policy Act (SEPA) and is used as a basis for comparison.

The four action alternatives included:

- Alternative 2 (Focused) includes the creation of additional areas of focused growth called neighborhood centers to create more housing around shops and services.
- Alternative 3 (Broad) allows a wider range of low-scale housing options, like duplexes, triplexes, fourplexes and stacked flats, in all Neighborhood Residential (NR) zones.
- Alternative 4 (Corridor) allows a wider range of housing options in areas near transit and amenities.
- Alternative 5 (Combined) includes the strategies for encouraging housing growth in Alternatives 2, 3, and 4 plus changes to existing center boundaries and designations.

Your comments helped refine the analysis of potential impacts of the alternatives studied and shaped a Preferred Alternative that is introduced in the Final EIS. The Final EIS contains a Preferred Alternative that combines elements of the alternatives studied in the DEIS, and studies growth of 120,000 households and 158,000 jobs by the year 2044, like Alternative 5. The FEIS also responds to comments made on the Draft EIS.

The Draft EIS and Final EIS together comprise the entire EIS for this proposal. Additional information about the proposal can be found here: Project Documents - OPCD | seattle.gov

Sincerely,



Rico Quirindongo
Director, Office of Planning and Community Development

FACT SHEET

Project Title

One Seattle Comprehensive Plan Update

Proposed Action & Alternatives

Legislation is proposed to update Seattle's Comprehensive Plan, which is the vision for how Seattle grows and makes investments and implementing development standards. The Comprehensive Plan's goals and policies and future land use map guide where new housing and jobs are directed, and where the City invests in transportation, utilities, parks, and other public assets. The Comprehensive Plan will also address racial inequities, housing costs, access to economic opportunity and education, and climate change. As part of the One Seattle Plan Update, the City will also consider updates to zoning and development regulations to implement the Plan. Final EIS alternatives vary levels, types, and locations of growth and investment.

- **Alternative 1: No Action**—The No Action Alternative is required under the State Environmental Policy Act (SEPA). It would continue implementation of the current Seattle 2035 Comprehensive Plan. The No Action Alternative for the One Seattle Plan maintains the status quo of focusing most housing and jobs within existing urban centers and villages with no change to land use patterns. It also incorporates changes proposed as part of the recent Industrial and Maritime Strategy EIS. It would meet regionally set growth targets including 80,000 new homes and 158,000 jobs for the period 2024-2044.
- **Alternative 2: Focused**—Alternative 2 includes the creation of additional areas of focused growth called neighborhood centers to create more housing around shops and services. Neighborhood centers would be similar to existing urban villages in that they would allow a wide range of housing types and commercial space, but with a smaller geographic size and lower intensity of allowed development. This alternative would result in a greater range of housing options with amenities and services in many neighborhoods. For the period 2024-2044, Alternative 2 includes more housing than Alternative 1 at 100,000 new homes. Eighty thousand homes would be located in a similar distribution to Alternative 1, with the 20,000 additional homes accommodated in neighborhood centers. Like Alternative 1, Alternative 2 includes 158,000 new jobs, but their distribution would vary. Compared to Alternative 1, about 15% of new jobs in Alternative 2 and the other action alternatives are assumed to be

located in proportion to the location of new housing. This assumption accounts for the desire of businesses like local retail, restaurants, and services to locate near housing.

- **Alternative 3: Broad**—Alternative 3 allows a wider range of low-scale housing options, like triplexes and fourplexes, in all Neighborhood Residential zones as part of the urban neighborhood place type. Alternative 3 proposes a total housing growth of 100,000 housing units (20,000 more than Alternative 1) to account for the potential additional housing demand that could be met with broad zoning changes. Eighty thousand units would be located in a similar distribution to Alternative 1, with the 20,000 additional homes accommodated in new housing types in Neighborhood Residential zones. Job growth would be the same as Alternative 1, but 15% of jobs would be located near new housing.
- **Alternative 4: Corridor**—Alternative 4 allows a wider range of housing options only in corridors to focus growth near transit and amenities. This alternative would increase production of both ownership and rental housing options in various neighborhoods and support City and regional investment in transit. Eighty thousand units would be located in a similar distribution to Alternative 1, with 20,000 additional homes accommodated in new housing types in the corridors, for a total of 100,000 new homes. Job growth would be the same as Alternative 1, but 15% of new jobs would be located near new housing to provide local shopping and services.
- **Alternative 5: Combined**—Alternative 5 contemplates the largest increase in supply and diversity of housing across Seattle except for the Preferred Alternative. It includes the strategies for encouraging housing growth in Alternatives 2, 3, and 4 plus additional changes to existing urban center and village boundaries and changes to new place type designations. Alternative 5 assumes 120,000 new housing units (40,000 more than Alternative 1) to account for the potential additional housing demand that could be met within the areas of change identified in Alternatives 2, 3, and 4 as well as changes to existing and new centers and villages. Eighty thousand units would be located in a similar distribution to Alternative 1, with the additional 40,000 units accommodated multiple areas of change. Job growth would be the same as Alternative 1. The distribution of jobs and housing would be a combination of the other alternatives.
- **Preferred Alternative: Mayor's Recommended Plan**—the Preferred Alternative includes the Mayor's Recommended Growth Strategy reflected in the proposed One Seattle Comprehensive Plan and the implementing zoning and development regulations. The plan and implementing zoning and development regulations were considered by the public during the Draft EIS and Draft Plan comment periods and public engagement opportunities. Proposed growth is 120,000 households similar to Alternative 5 (40,000 more than Alternative 1). The Preferred Alternative studies 158,000 jobs for the period 2024-2044.

In addition to reviewing conditions and impacts citywide, this EIS also provides a focused review of the 130th and 145th Street Station Area Plan and options for the City to streamline future environmental review in that area, which may include a planned action (RCW 43.21c.440), infill exemption (RCW 43.21C.229), or other tools available under state legislation (e.g., SB 5818).

Proponent & Lead Agency

City of Seattle Office of Planning and Community Development

Location

Seattle city limits

Tentative Date of Implementation

June 2025

Responsible SEPA Official

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Required Approvals

All Comprehensive Plan amendments and implementing regulations, including those completed as part of the One Seattle Plan require a 60-day review by the State of Washington Department of Commerce and other state agencies.

The Puget Sound Regional Council (PSRC) will also conduct a comprehensive plan consistency review and transportation certification review with VISION 2050. Countywide Centers will be reviewed by King County for compliance with the King County Countywide Planning Policies. Housing policies will be reviewed by the King County Affordable Housing Committee in

accordance with King County Countywide Planning Policies. Locally, the One Seattle Plan and all related regulatory updates will be considered by the Seattle Planning Commission and its recommendations forwarded to the City Council who will deliberate and determine approval.

Principal EIS Authors & Contributors

Under the direction of the City of Seattle, the consultant team prepared the EIS as follows:

- BERK Consulting (prime): SEPA documentation; Land Use & Shoreline Patterns; Relationship to Plans, Policies, & Regulations; Population, Housing, & Employment; Public Services
- Fehr & Peers: Transportation
- Historical Research Associates: Cultural Resources
- Kimley-Horn: Air Quality & GHG Emissions; Energy & Natural Resources; Noise
- MAKERS: Urban Form
- Parametrix: Earth & Water Quality; Plants & Animals; Utilities
- Schemata Workshop: Urban Form and Environmental Analysis Advisor

Draft EIS Date of Issuance & Comment Period

March 7, 2024

The City of Seattle requested comments from citizens, agencies, tribes, and all interested parties on the Draft EIS from March 7, 2024 to May 6, 2024. Comments were due by **5:00 PM, May 6, 2024**.

Final EIS Date of Issuance

The City reviews public comments and publishes responses in this Final EIS that refines information in the Draft EIS document, provides additional information or corrections, and identifies a Preferred Alternative. Draft Zoning was released for public review in October 2024. The Mayor's Recommended Comprehensive Plan was issued on January 6, 2025.

The Final EIS was issued on January 30, 2025.

Date of Final Action

June 2025

Prior Environmental Review

The current EIS considers the prior evaluation of the Seattle 2035 Comprehensive Plan. The Draft EIS was issued May 4, 2015 and the Final EIS was issued May 5, 2016. These are available at https://www.seattle.gov/opcd/ongoing-initiatives/seattle-2035-comprehensive-plan#projectdocuments.

As a result of the Seattle Transportation Plan and ongoing development of the Comprehensive Plan Transportation Element and Capital Facility Element, proposed transportation investments are evaluated in the Final EIS. The Seattle Transportation Plan EIS was published as a Draft EIS August 31, 2023 at https://content.govdelivery.com/accounts/WASEATTLE/bulletins/36de53e. The Final EIS was published on February 29, 2024: https://content.govdelivery.com/accounts/WASEATTLE/bulletins/38e18aa.

Location of Background Data

You may review the City of Seattle website for more information at https://www.seattle.gov/opcd/one-seattle-plan. Please see the contact person above if you desire clarification or have questions.

Purchase/Availability of Final EIS

The Final EIS can be downloaded from the City of Seattle's website at https://www.seattle.gov/opcd/one-seattle-plan. A hard copy or thumb drive are available for purchase at cost (see the contact person above to arrange).

DISTRIBUTION LIST

Federal & Tribal Agencies

Muckleshoot Indian Tribe
Puyallup
Snoqualmie Indian Tribe
Suquamish Tribe
Tulalip Tribes
National Oceanic and Atmospheric Administration Fisheries, National Marine Fisheries Service
National Oceanic and Atmospheric Administration Fisheries, Section 7
U.S. Army Corps of Engineers
U.S. Department of Agriculture, Wildlife Services Division
U.S. Department of Fish & Wildlife Services
U.S. Department of Housing & Urban Development
U.S. Environmental Protection Agency
USDA-Wildlife Services Division

State Agencies

Department of Archaeology & Historic Preservation
Department of Commerce
Department of Commerce, Growth Management Services
Department of Ecology
Department of Fish & Wildlife
Department of Natural Resources
Department of Transportation, SEPA Reviews
Department of Transportation, Development Services
Puget Sound Partnership
Washington Conservation Commission

Regional & County Agencies

King County Department of Housing and Community Development
King County Department of Natural Resources
King County Department of Transportation
King County Environmental Planning, Wastewater Treatment Division
King County Executive's Office
King County Office of Performance, Strategy, and Budget
King County Metro, Transit and Environmental Planning

King County Regional Water Quality Committee
King County Wastewater Treatment Division
Port of Seattle
Puget Sound Clean Air Agency
Puget Sound Regional Council
Public Health—Seattle & King County
Sound Transit, Planning, Environment, and Project Development Division

Seattle, Adjacent Jurisdictions, Service Providers

City of Shoreline
City of Burien
Puget Sound Energy
Century Link
Xfinity
Centrio
Seattle City Light
Seattle Housing Authority
Seattle City Council Legislative Department
Seattle Department of Construction and Inspections
Seattle Department of Education and Early Learning
Seattle Department of Neighborhoods
Seattle Department of Neighborhoods, Historic Preservation Program
Seattle Department of Transportation
Seattle Finance and Administrative Services
Seattle Fire Department
Seattle Law Department
Seattle Office of Economic Development
Seattle Office of Emergency Management
Seattle Office of Housing
Seattle Office of Planning & Community Development
Seattle Office of the Mayor
Seattle Parks and Recreation
Seattle Police Department
Seattle Public Library
Seattle Public School
Seattle Public Utilities

Community Organizations & Individuals

Commenters on the Draft EIS (see Chapter 4)
Duwamish Tribe
Seattle Times
United Indians of All Tribes

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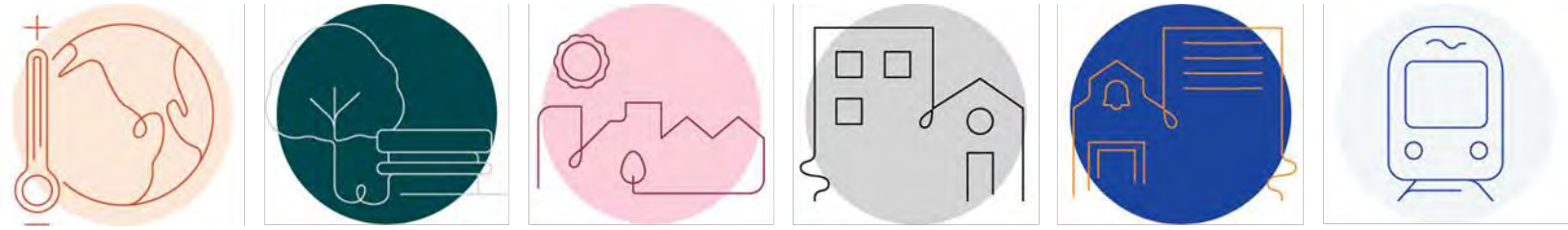
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1 SUMMARY





Source: City of Seattle, 2023.

1.1 Purpose

This chapter summarizes the proposals, alternatives, and environmental review findings in the ~~Draft~~ Final EIS. Details of the alternatives are addressed in **Chapter 2**, and the full environmental evaluation and mitigation measures are in **Chapter 3**. **Chapter 4** contains responses to comments on the Draft EIS. This Final EIS identifies track changes where the Draft EIS was clarified or corrected or to reference the Preferred Alternative.

Seattle's Comprehensive Plan defines the vision for how the City will grow. The existing Plan was adopted in 2016; the next required update ~~is~~ was due in 2024 with implementing regulations regarding middle housing due by 2025.

The Comprehensive Plan update will guide decisions about where to locate housing and jobs, and where and how to invest in transportation, utilities, parks, and other public assets as well as guide implementing development standards. The goal of the Plan update is to make the City more equitable, livable, sustainable, and resilient for today's communities and future residents. A subarea is reviewed in greater detail at the 130th and 145th Station Area as a result of a station area planning process ongoing since 2019.

This ~~Draft~~ Final EIS identifies and examines ~~five~~ six alternatives, which represent different ways of implementing land use concepts to achieve the City's objectives. This includes a No Action Alternative to serve as the baseline for comparing the potential impacts of the action alternatives. Each alternative is summarized below in **Exhibit 1.1-1** and described in greater detail in **Section 1.4**. The final plan and implementing legislation could implement a specific alternative or a combination of changes analyzed in different alternatives.



Hing Hay Park. Source: City of Seattle, 2023.

Exhibit 1.1-1 Alternatives Summary

Alternative 1: No Action		
Maintains the status quo—implementing existing Seattle 2035 Comprehensive Plan and focusing housing/job growth in existing urban centers and urban villages. 80,000 new homes and 158,000 new jobs would be added over the next 20 years. 130th and 145th Station Areas: Retains current zoning. 194 new homes and 109 new jobs would be added around the 130th station area. 646 new homes and 607 new jobs would be added around the 145th station area.		
Alternative 2: Focused	**Alternative 3: Broad**	**Alternative 4: Corridor**
Creates a neighborhood center designation (like urban village, but smaller and lower intensity) around certain existing neighborhood business districts. Neighborhood centers could have a range of housing from duplexes to 7 story stacked housing. 100,000 new homes and 158,000 new jobs The additional 20,000 homes are located in neighborhood centers; 15% of new jobs would be shifted based on location of new housing. 130th/145th Station Area: Designate 3 new neighborhood centers, creating mixed-use nodes with heights up to 80 feet near transit. 1,049 new homes and 284 new jobs around 130th Street. 1,159 new homes and 695 new jobs around 145th Street.	Broadens the range of low-scale housing options allowed in all Neighborhood Residential zones (which currently allow only detached homes and accessory dwelling units) as part of a new urban neighborhood place type. Housing in the urban neighborhood place type could include detached and attached homes including duplexes, triplexes, and fourplexes as well as stacked flats and sixplexes on larger lots. 100,000 new homes and 158,000 new jobs. The additional 20,000 homes are located within Neighborhood Residential zones; 15% of new jobs would be shifted based on the location of new housing. 130th/145th Station Area: No changes beyond changes to Neighborhood Residential described above.	Allows wider range of housing options in corridors to focus growth within a short walk of frequent transit and amenities. Corridors could have a range of housing options from duplexes to 5 story stacked housing or higher heights in existing multifamily/commercial areas. 100,000 new homes and 158,000 new jobs. The additional 20,000 homes are located in corridor areas; 15% of new jobs would be shifted based on location of new housing. 130th/145th Station Area: No changes beyond changes to corridors described above.
Alternative 5: Combined		
Allows the largest increase in supply and diversity of housing across Seattle among the alternatives, except for the Preferred Alternative, by including strategies from Alternatives 2, 3, and 4 plus designating Ballard as a regional center, expanding boundaries of seven existing urban centers (formerly called urban villages), and designating the 130th Station Area as an urban center. Distribution of housing units and jobs is a combination of other alternatives but accommodates a total of 120,000 new homes and 158,000 new jobs. 130th/145th Station Area: Adds 1,644 new homes and 356 new jobs around a new urban center at 130th Street and 1,059 new homes and 648 new jobs around a new neighborhood center at 145th Street.		
Preferred Alternative		
Includes the Mayor's Recommended Growth Strategy in the proposed One Seattle Comprehensive Plan and One Seattle Zoning Update. Allows an increase in supply and diversity of housing across Seattle similar to Alternative 5 plus designated Ballard as a regional center, expanding boundaries of nine existing centers (formerly called urban villages), and designating the 130th Station Area as an urban center. Like Alternative 5, the Preferred Alternative accommodates a total of 120,000 new homes and 158,000 new jobs. 130th/145th Station Area: Adds 1,500 new homes and 360 new jobs around a new urban center at 130th Street and 652 new homes and 298 new jobs around a new neighborhood center at 145th Street.		

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—edits to Alternatives 1–5 are reflected with underlined text.

Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

1.2 SEPA Process

This document is a non-project EIS that analyzes a range of legislative changes that will implement the One Seattle Plan across the study area. Under the State Environmental Policy Act (SEPA), agencies conduct environmental review of actions that could affect the environment—including policy and regulation changes like the One Seattle Plan. Preparation of an EIS is required for actions that have potentially significant impacts on the built or natural environment so that the public, agencies, tribes, and City decision-makers have information about the environmental effects of changes before a decision is made.

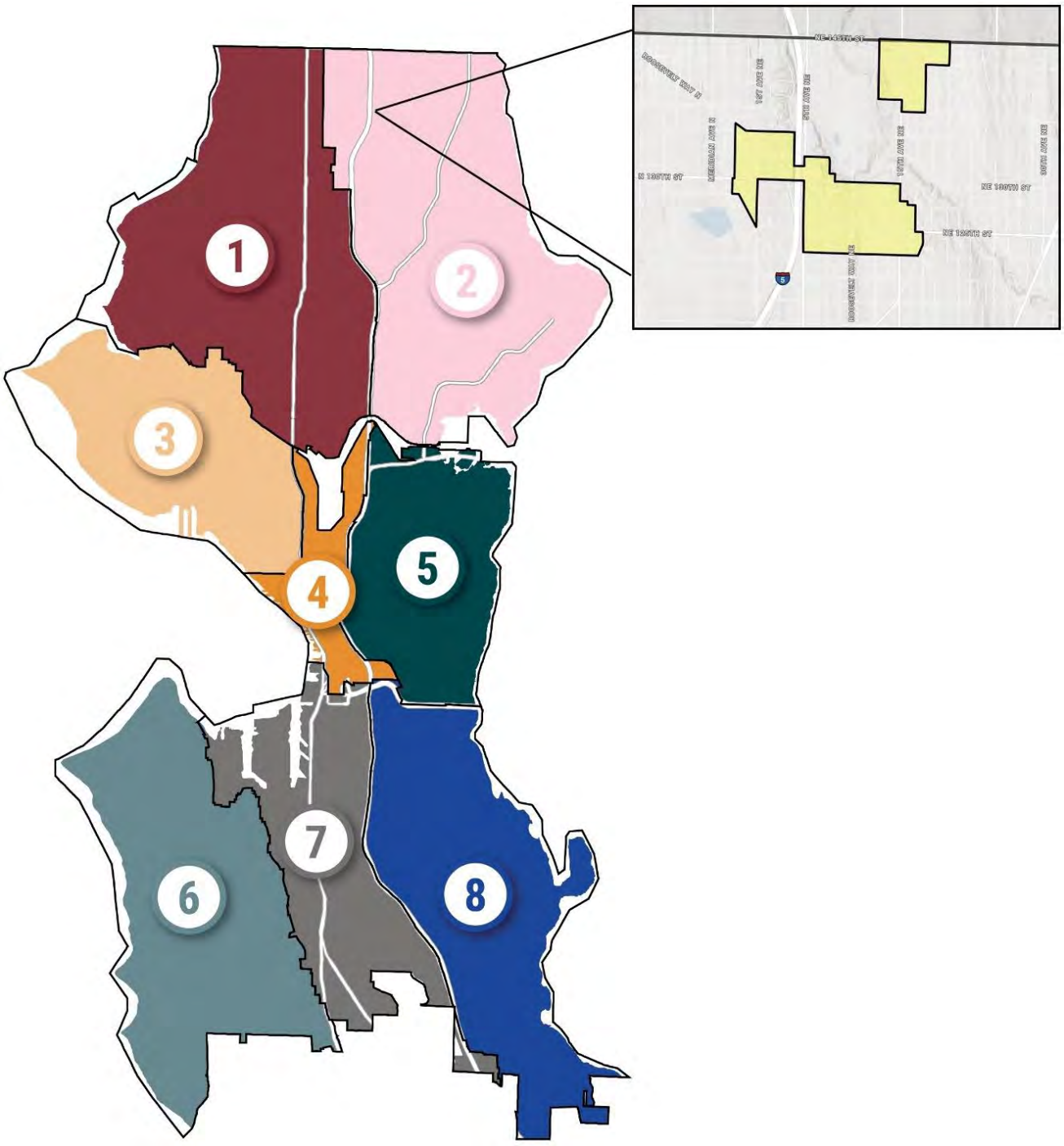
As part of scoping, the City identified a range of elements of the environment that should be analyzed in the EIS: earth & water quality, air quality/greenhouse gas (GHG), plants & animals, energy & natural resources, noise, land use patterns, historic resources, population, employment, & housing, transportation, and public services & utilities. ~~This document is a~~A Draft EIS ~~that is being~~was provided in March 2024 in order to solicit public feedback. ~~It is anticipated that the Final EIS will come out with the Mayor's Recommended Plan in Fall of 2024.~~ This Final EIS addresses the Mayor's Proposed One Seattle Plan Comprehensive Plan Update, issued in January 2025 ("Proposed Plan").

For a summary of public comment opportunities, please see the Fact Sheet and the project website: https://www.seattle.gov/opcd/one-seattle-plan.

1.3 Study Area

The study area includes the full city limits and has been divided into eight analysis areas. A subarea is also reviewed in greater detail at the 130th and 145th Station Area as a result of a station area planning process ongoing since 2019. See **Exhibit 1.3-1**.

Exhibit 1.3-1. Analysis Areas and 130th/145th Station Study Area



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

1.4 Objectives, Proposal, & Alternatives

1.4.1 Objectives

The State Environmental Policy Act (SEPA) requires a statement of proposal objectives and the purpose and need to which the proposal for the Comprehensive Plan Update is responding. Alternatives are different means of achieving objectives.

The objectives of the update include:

- 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.
- Livability: Foster complete neighborhoods where more people can walk or bike to everyday destinations such as local shops, parks, transit, cultural amenities, and services.
- Affordability: Increase the supply of housing to ease increasing housing prices caused by competition for limited supply and create more opportunities for income-restricted affordable housing.
- Inclusivity:
  - Increase diversity of housing options in neighborhoods throughout Seattle to address exclusivity and allow more people to live and stay in a variety of neighborhoods.
  - Reduce residential displacement and support existing residents, particularly low-income households, who are struggling to stay in their neighborhoods.
- Climate resiliency: Reduce emissions from buildings and transportation and promote adaptations to make our city more capable of withstanding the impacts of climate change.
- Consistency with other Plans and Policies: Meet state and regional policies and requirements for the Comprehensive Plan Update including, but not limited to growth and housing affordability targets.

In addition to the citywide objectives, the vision statement in the "130th & 145th Station Area Planning Plan for Public Review", July 2022 serves as an objective for that study area:

> *The 130th and 145th Station Area is a lively, walkable, and welcoming North Seattle neighborhood. Major streets have roomy, tree-lined sidewalks, and other green infrastructure. Bicycle infrastructure makes everyday trips to transit stations, schools, and neighboring urban villages enjoyable and safe. An array of housing offers options affordable to a broad range of incomes and lifestyles. Small shops and cafes near the station cater to locals, commuters, students, and visitors. Local and citywide lovers of nature, recreation and culture treasure the abundant greenspaces and unique cultural events so easily reached by walking, biking, or transit.*

1.4.2 Proposal

Legislation is proposed to update Seattle's Comprehensive Plan, which is the vision for how Seattle grows and makes investments and implementing development standards. The Comprehensive Plan's goals and policies and future land use ~~plan~~ map guide ~~decisions about~~ where ~~the City should expect and support~~ new housing and jobs are directed, and where the City invests in transportation, utilities, parks, and other public assets. The Comprehensive Plan must be updated by 2024 to address state and regional goals and requirements with implementing regulations regarding middle housing due by 2025. The Comprehensive Plan will also address racial inequities, housing costs, access to economic opportunity and education, and climate change. As part of the Comprehensive Plan Update, the City will also consider updates to zoning and development regulations to implement the Plan. ~~Draft~~ Final EIS alternatives vary levels, types, and locations of growth. ~~Five~~ Six alternatives are described further in **Section 1.4** and **Chapter 2**:

- **Alternative 1: No Action**—The No Action Alternative is required under the State Environmental Policy Act (SEPA). It would continue implementation of the current Seattle 2035 Comprehensive Plan. The No Action Alternative for the One Seattle Plan maintains the status quo of focusing most housing and jobs within existing urban centers and villages with no change to land use patterns. It also incorporates changes recently adopted by the Seattle City Council to implement the Industrial and Maritime Strategy. It would meet regionally set growth targets by adding 80,000 new homes and 158,000 jobs during the period 2024-2044.
- **Alternative 2: Focused**—Alternative 2 includes the creation of additional areas of focused growth called neighborhood centers to create more housing around shops and services

Place Types

- **Regional Centers** are regionally designated places with a diverse mix of uses, housing, and employment They include several centers that comprise greater Downtown along with the University District and Northgate. These contain Seattle's densest neighborhoods and a large share of the city's jobs.
- **Urban Centers** are dense, walkable, mixed-use places with a wide range of housing and businesses located near transit, amenities, and jobs.
- **Neighborhood Center** are 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.
- **Corridors** are areas near frequent transit and large parks that allow a wide range of housing types in areas currently zoned primarily for detached homes (within a 10-minute walk from a light rail station and a five-minute walk from frequent bus transit service and entrances to large parks). Corridors also include areas already zoned for multifamily and commercial use and could have small increases in height.
- **Urban Neighborhoods** represent low-scale, primarily residential areas. This place type would primarily allow housing types such as detached homes, duplexes, triplexes, fourplexes, and stacked flats. This place type would allow flexibility for new forms of housing in areas currently zoned primarily for detached homes.
- **Manufacturing and Industrial Centers** are regionally designated industrial job centers. The One Seattle Plan process would not change the boundaries of these centers nor the goals and policies for these areas which were recently updated as part of the Industrial and Maritime Strategy project.

dispersed across the city. Neighborhood centers would be similar to urban villages in that they would allow a wide range of housing types and commercial space, but with a smaller geographic size and lower intensity of allowed development. This Alternative would result in a greater range of housing options with amenities and services in many neighborhoods. For the period 2024-2044, Alternative 2 includes more housing than Alternative 1 at 100,000 new homes. Jobs would be similar to Alternative 1 at 158,000 new jobs. While the number of total new jobs would be the same for each of the alternatives, their distribution would vary. Compared to Alternative 1, about 15% of new jobs in each action alternative are assumed to be located in proportion to the location of new housing. This assumption would account for the desire of many businesses such as local retail, eating places, and services, to locate near housing. Eighty thousand new homes would be located in a similar distribution to Alternative 1, with the additional 20,000 accommodated in neighborhood centers.

- **Alternative 3: Broad**—Alternative 3 allows a wider range of low-scale housing options, like duplexes, triplexes, fourplexes and stacked flats, in all Neighborhood Residential (NR) zones as part of a new urban neighborhood place type. Alternative 3 proposes a total housing growth of 100,000 housing units (20,000 more than the No Action Alternative) to account for the potential additional housing demand that could be met with broad zoning changes. Eighty thousand new homes would be located in a similar distribution to Alternative 1, with the additional 20,000 accommodated in new housing types within urban neighborhood areas. Jobs would be similar to Alternative 1 in number with distribution of 15% of jobs proximate to new housing.
- **Alternative 4: Corridor**—Alternative 4 allows a wider range of housing options only in corridors to focus growth near transit and amenities. This alternative would increase production of housing in various neighborhoods and support city and regional investment in transit. Eighty thousand new homes would be located in a similar distribution to Alternative 1, with an additional 20,000 accommodated in new housing types within the corridors, for a total of 100,000 new dwellings. New jobs would be similar to Alternative 1 at 158,000, but 15% of new jobs would be located in proximity to the new housing to provide local shopping and services.
- **Alternative 5: Combined**—Alternative 5 has the largest increase in supply and diversity of housing across Seattle except for the Preferred Alternative. It includes the strategies for encouraging housing growth in Alternatives 2, 3, and 4 plus designating Ballard as a regional center, expanding boundaries of seven existing urban centers (formerly called urban villages), and designating the 130th Station Area as an urban center. Alternative 5 would assume 120,000 new homes (40,000 more than the No Action Alternative) to account for the potential additional housing demand that could be met within the areas of change identified in Alternatives 2, 3, and 4 as well as changes to existing and new centers and villages. Eighty thousand new homes would be located in a similar distribution to Alternative 1, with the additional 40,000 units accommodated across multiple areas of change. The distribution of jobs and housing would be a combination of the other alternatives.

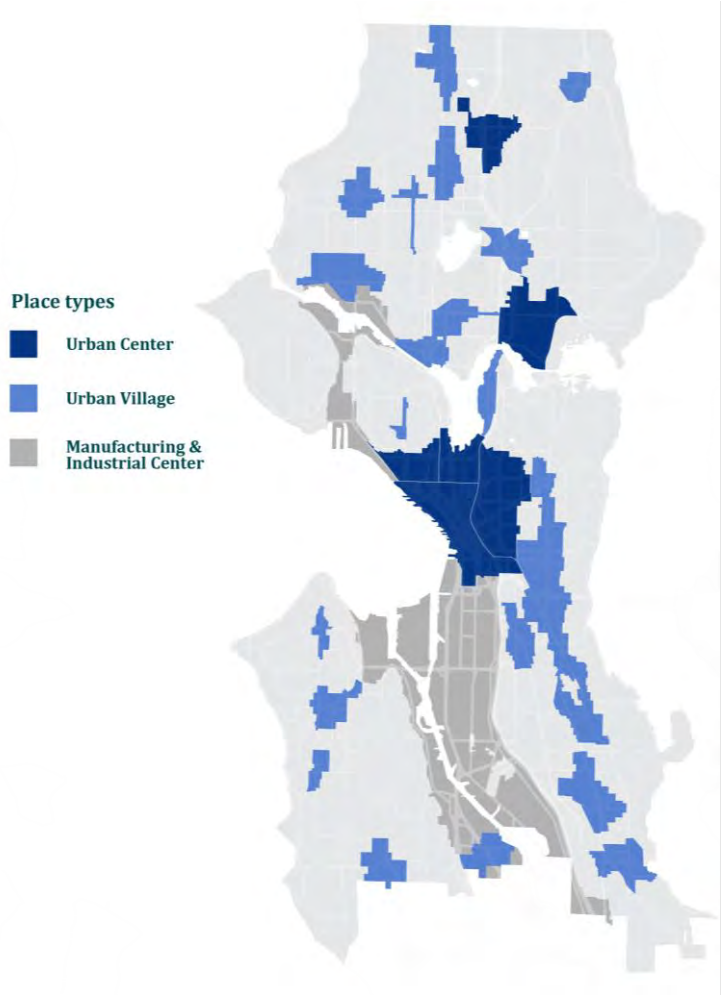
- **Preferred Alternative: Mayor's Recommended Plan**—the Preferred Alternative includes the Mayor's Recommended Growth Strategy reflected in the proposed One Seattle Comprehensive Plan and the One Seattle Zoning Update. The plan and implementing zoning consider the public comment during the Draft EIS and Draft Plan comment periods and public engagement opportunities. The growth studied, similar to Alternative 5, totals at 120,000 new dwellings (40,000 more than Alternative 1) and 158,000 jobs (the same as all alternatives) for the period 2024-2044.

In addition to reviewing conditions and impacts citywide, this EIS also provides a focused review of the 130th and 145th Street Station Area Plan and options for the City to streamline future environmental review in that area, which may include a planned action (RCW 43.21c.440), infill exemption (RCW 43.21C.229), or other tools available under state legislation (e.g., SB 5818).

1.4.3 Alternative 1: No Action

Citywide Growth Concept: Alternative 1, No Action, assumes the continuation of the Seattle 2035 Comprehensive Plan. Even without making any changes to the City's zoning, the existing Comprehensive Plan and implementing regulations would add 80,000 new homes and 158,000 jobs over the next 20 years, based on growth targets adopted by the King County Growth Management Council.[1] These homes and jobs will be distributed across the city based on observed growth between 2010 and 2020 and the distribution of growth in the Seattle 2035 Comprehensive Plan. In addition, growth in each urban center and village would not exceed existing zoned capacity. While there have been significant increases in the number of people working from home in recent years, job locations are frequently indicated based on the office in which the company is located, rather than where the work takes place. Consequently, future growth may look similar to past growth even if the portion of people working from home remains high.

Exhibit 1.4-1. Alternative 1: No Action



Note: See **Exhibit 2.1-1** in **Chapter 2** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Source: City of Seattle, 2023.

130th/145th Station Area: The current Comprehensive Plan and zoning designations would be retained under Alternative 1, No Action, in the 130th/145th Station Area. Neighborhood Residential zones would continue to allow three-story single-purpose residential development around the future light rail station at 130th and some 4-8 story multifamily uses near the 145th BRT station. Based on current plans and zoning, this ~~Draft~~ Final EIS studies the addition of 194 housing units/109 jobs around the 130th Station Area and 646 housing units and 607 jobs around 145th Station Area.

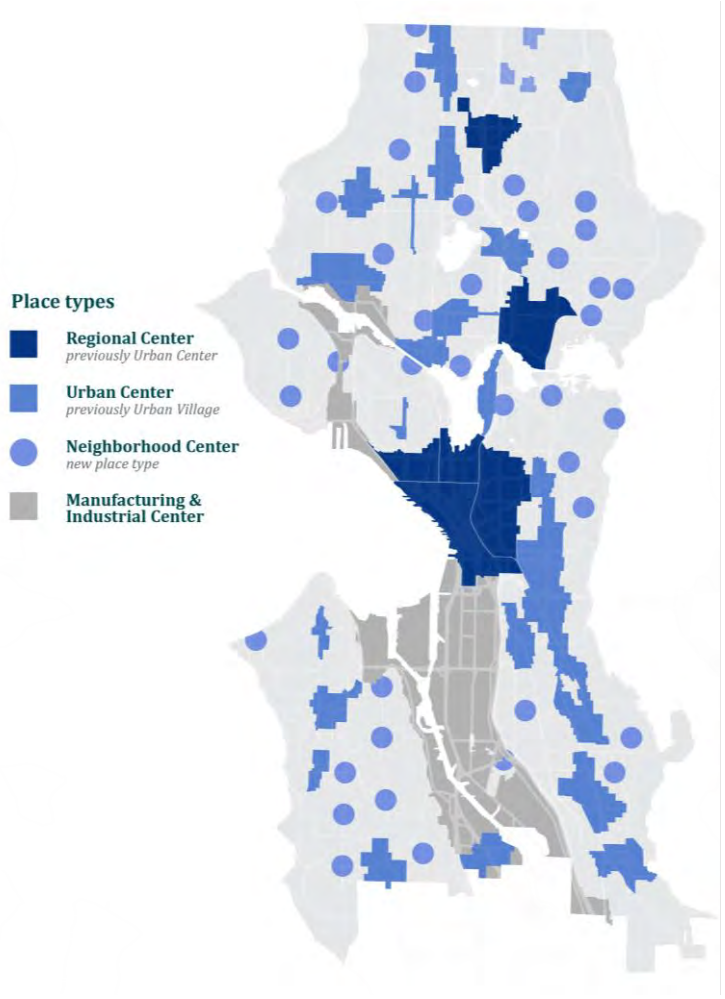
[1] Growth targets were set for the years 2019-2044, but in the EIS have been adjusted to match the required 20-year planning period for 2024-2044, to account for population, housing, and employment change for the years 2019-2023.

1.4.4 Alternative 2: Focused

Citywide Growth Concept: Alternative 2 would designate additional areas of focused growth called neighborhood centers to create more housing around shops and services. Neighborhood centers would be similar to urban centers (formally known as urban villages) since they would allow a wide range of housing types and commercial space, but with a smaller geographic size and lower intensity of allowed development. Neighborhood centers could have a range of housing from townhouses to 7 story stacked housing.

Alternative 2 studies a total housing growth of 100,000 housing units (20,000 more than the No Action Alternative) to account for the potential additional housing demand assumed within neighborhood centers. Eighty thousand new homes would be located in a similar distribution to Alternative 1, with an additional 20,000 accommodated in new housing types within neighborhood centers. Neighborhood centers in areas with low displacement risk are allocated 50% more homes than those in areas with high displacement risk.

Exhibit 1.4-2. Alternative 2: Focused



Note: See **Exhibit 2.1-1** in **Chapter 2** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Source: City of Seattle, 2023.

130th/145th Station Area: Alternative 2 would implement a subarea plan that would:

- Create city and community concepts around land use, transportation and other policies and investments for fast, reliable transit and compact walkable neighborhoods.
- Align with the City of Seattle Comprehensive Plan (One Seattle Plan).
- Lead with equity to address past systemic inequities and minimize factors that contribute to displacement.
- Address Climate Change by reducing vehicle miles traveled, car dependency and greenhouse gas (GHG) emissions.

Alternative 2 would designate three new neighborhood centers. Growth would equal: 1,049 housing units/284 jobs at 130th Street and 1,159 housing units/695 jobs at 145th Street.

1.4.5 Alternative 3: Broad

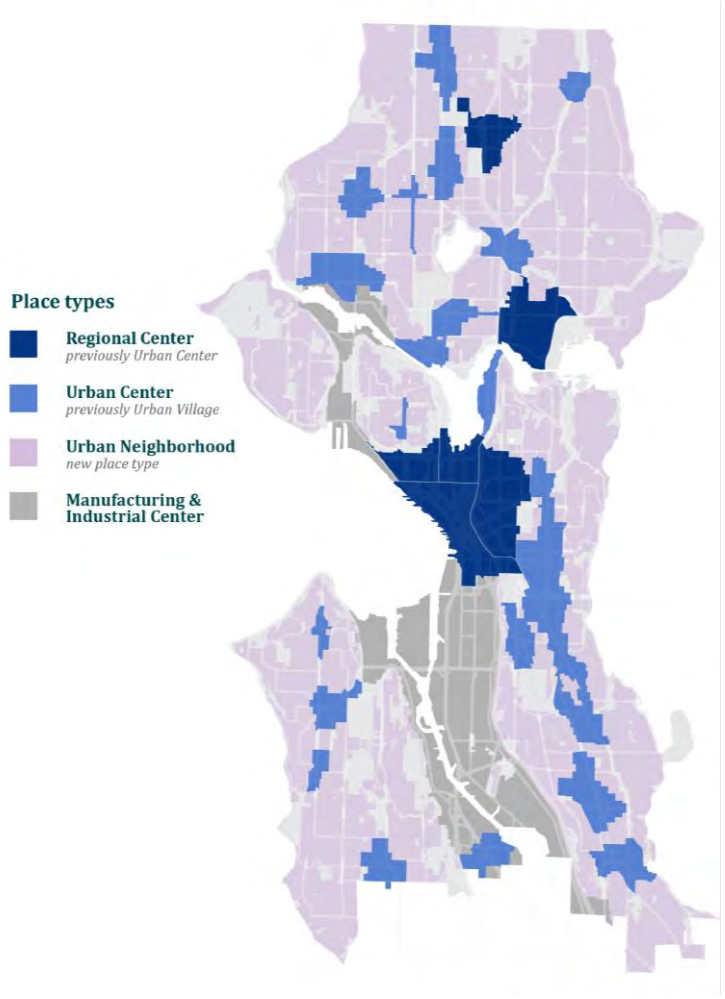
Citywide Growth Concept: This alternative allows a wider range of low-scale housing options, like triplexes and fourplexes, in all Neighborhood Residential (NR) zones as part of a new urban neighborhood place type. This approach would:

- Expand housing choices in all neighborhoods.
- Increase production of homeownership options.
- Address exclusionary nature of current zoning.
- Allow more housing options near existing large parks and other neighborhood amenities.

Housing in the urban neighborhood place type could include duplexes, triplexes, and fourplexes as well as stacked flats and sixplexes on larger lots.

Alternative 3 studies a total housing growth of 100,000 housing units (20,000 more than the No Action Alternative) to account for the potential additional housing demand that can be accommodated with broad zoning changes. Eighty thousand units would be located in a similar distribution to Alternative 1, with an additional 20,000 accommodated within urban neighborhood areas.

Exhibit 1.4-3. Alternative 3: Broad



Notes: The urban neighborhood areas shown on this map do not reflect the viability of redevelopment on any specific property. Factors such as property ownership, existing uses, and presence of environmentally critical areas will be factored into the distribution of housing and jobs studied in the EIS analysis. See **Exhibit 2.1-1** in **Chapter 2** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~. Place type names were corrected in the legend for the Final EIS to reflect the proposed place type names.
Source: City of Seattle, 202~~3~~4.

Alternative 3 studies the same number of jobs as the No Action Alternative but would include a small shift in the distribution of jobs and commercial space toward existing urban neighborhood areas to reflect local demand consistent the distribution of new housing.

130th/145th Station Area: Under this alternative, there would be no changes to the future land use map within this area but there would be more flexibility in urban neighborhood areas for missing middle housing as well as corner stores and at-home businesses.

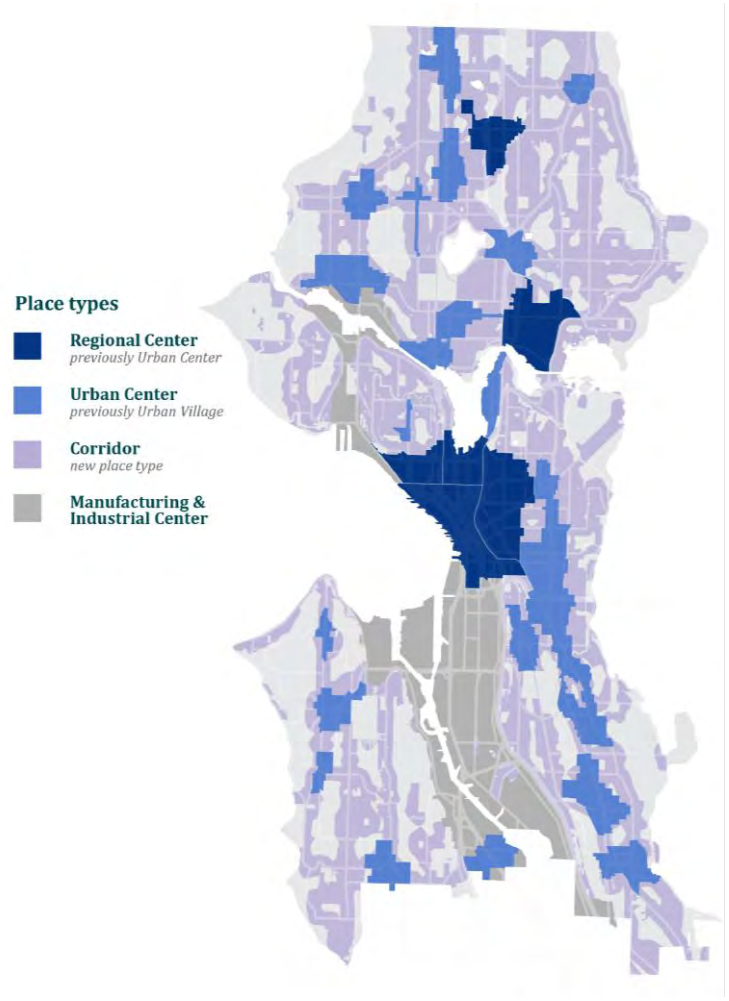
1.4.6 Alternative 4: Corridor

Citywide Growth Concept: This alternative would allow a wider range of housing options only in corridors to focus growth within a short walk of transit and amenities. This alternative would increase production of both homeownership and rental options in various neighborhoods and support city and regional investment in transit. Corridors could have a range of housing options from duplexes to 5-story stacked housing or higher heights in existing multifamily/commercial areas.

Alternative 4 studies a total housing growth of 100,000 housing units (20,000 more than the No Action Alternative) to account for the potential additional housing demand that is expected within the corridors. Eighty thousand units would be located in a similar distribution to Alternative 1, with 20,000 additional homes accommodated within corridors. Alternative 4 would have the same number of jobs as the No Action Alternative but includes a small shift in the distribution of jobs and commercial space toward corridors, consistent with the distribution of new housing.

Corridor areas would be the largest single place type and would accommodate the second highest housing growth after regional centers. Most jobs would be generated in the regional centers and the manufacturing industrial centers.

Exhibit 1.4-4. Alternative 4: Corridor



Notes: The Corridors shown on this map do not reflect the viability of redevelopment on any specific property. Factors such as property ownership, existing uses, and presence of Environmentally Critical Areas will be factored into the distribution of housing and jobs studied in the EIS analysis. See **Exhibit 2.1-1** in **Chapter 2** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle, 2023.

130th/145th Station Area: Within the station areas, a wider range of housing options would be allowed only in corridors consistent with the citywide approach.

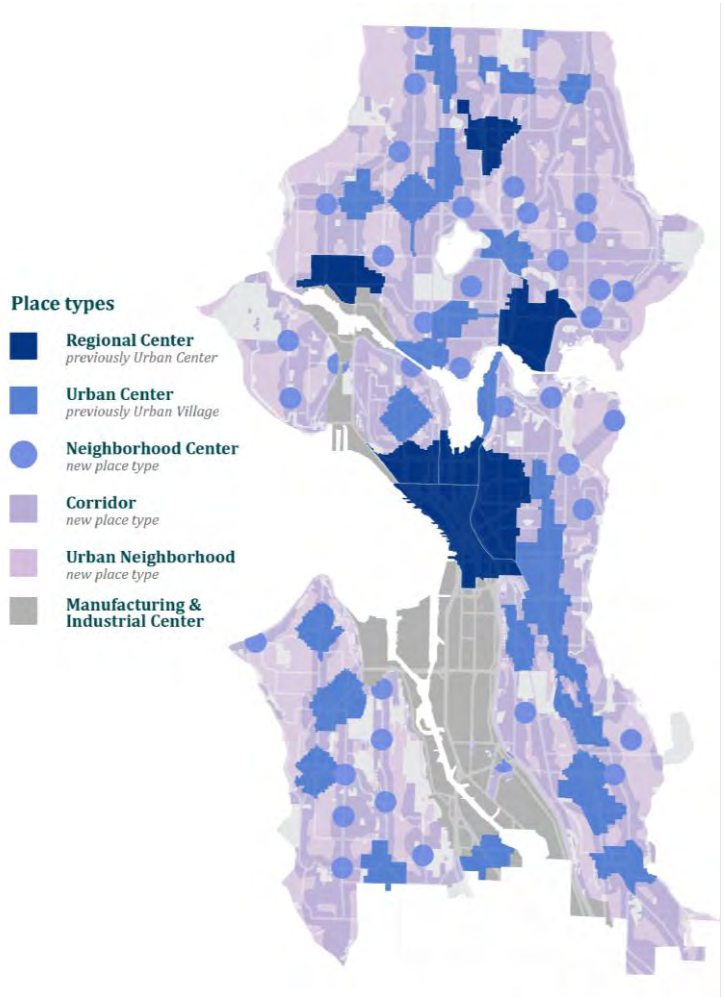
1.4.7 Alternative 5: Combined

Citywide Growth Concept: Alternative 5 anticipates the largest increase in supply and diversity of housing across Seattle <u>along with the Preferred Alternative</u>. It includes the strategies for encouraging housing growth in Alternatives 2, 3, and 4 plus additional changes to existing urban center and village boundaries and changes to place type designations. This alternative seeks to:

- Accommodate abundant housing in neighborhoods across the city.
- Promote a greater range of rental and ownership housing.
- Address past underproduction of housing and rising housing costs.

Alternative 5 assumes growth of 120,000 housing units (40,000 more than the No Action Alternative) to account for the potential additional housing growth that could occur under a combination of changes identified in Alternatives 2, 3, and 4 plus designating Ballard as a regional center, expanding boundaries of seven existing urban centers (formerly called urban villages), and designating the 130th Station Area as an urban center. Eighty thousand units would be located in a similar distribution to Alternative 1, with the additional 40,000 distributed based on a combination of Alternatives 2, 3, and 4. The distribution of jobs and housing would be a combination of the other alternatives after accounting for expanded urban village boundaries and potential changes to place type designations.

Exhibit 1.4-5. Alternative 5: Combined



Notes: The corridors and urban neighborhood areas shown on this map do not reflect the viability of redevelopment on any specific property. Factors such as property ownership, existing uses, and presence of environmentally critical areas will be factored into the distribution of housing and jobs studied in the EIS analysis. See **Exhibit 2.1-1** in **Chapter 2** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under <u>the other a</u>~~A~~lternatives ~~2–5~~. <u>Place type names were corrected in the legend for the Final EIS to reflect the proposed place type names.</u>
Source: City of Seattle, 202<u>4</u>~~3~~.

130th/145th Station Area: Under Alternative 5, an urban center would be created straddling the west and east sides of I-5 at the Sound Transit light rail station. This alternative adds 1,644 housing units/356 jobs around 130th Street and 1,059 housing units/648 jobs around 145th Street.

1.4.8 Preferred Alternative

Note: This Preferred Alternative section was added since the Draft EIS.

The Preferred Alternative includes the Mayor's Recommended One Seattle Comprehensive Plan. The Preferred Alternative studied growth similar to Alternative 5, at 120,000 new dwellings. The Preferred Alternative proposes 158,000 new jobs like other studied alternatives.

The Preferred Alternative place types described in **Section 1.4.2** are implemented by One Seattle Zoning. The Preferred Alternative incorporates ideas developed in Alternatives 1–5. Notable features of this alternative include:

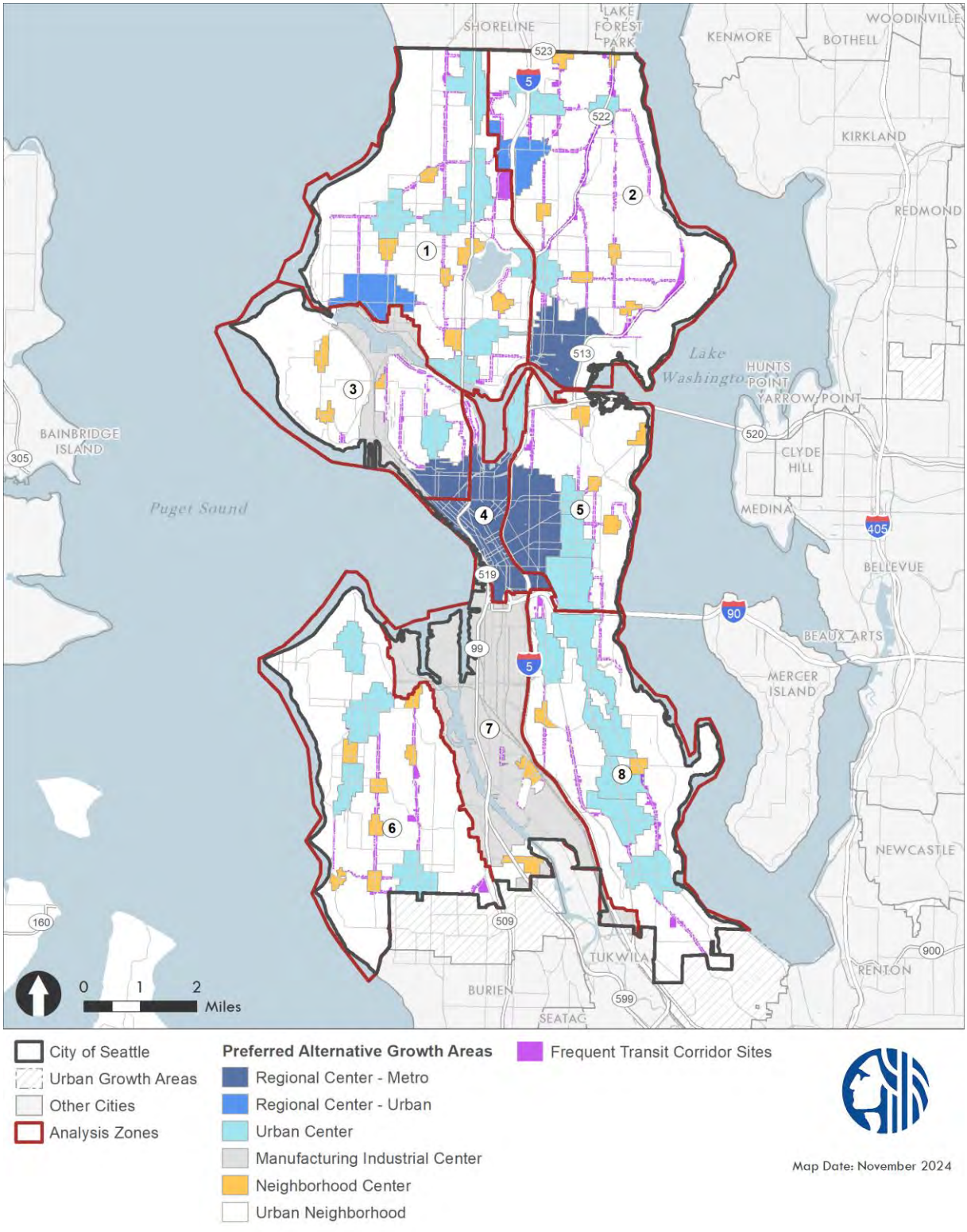
- Regional Centers (7) and Urban Centers (25)
  - Similar to Alternative 5, Ballard would become a regional center
  - Similar to Alternative 5, a new urban center is located at NE 130th Street Light Rail Station
  - Expansions are located at new light rail stations, in Squire Park, and in small centers. This includes expansion of the First Hill/Capitol Hill Regional Center and 23rd & Union–Jackson Urban Center.
- Neighborhood Centers (30)
  - Similar to Alternatives 2 and 5, there are 30 new neighborhood centers. This includes 5 that are expanded or shifted in comparison to Alternatives 2 and 5:
    - North Magnolia (was mostly neighborhood center and urban neighborhood under Alternative 5)
    - High Point (was mostly neighborhood center under Alternative 5)
    - Mid Beacon Hill (was mostly corridor under Alternative 5)
    - Upper Fremont (was mostly neighborhood center under Alternative 5)
    - Hillman City (was mostly corridor under Alternative 5)
  - Additionally, 1 neighborhood center is changed from an urban center considered under Alternatives 1–5 to a neighborhood center (South Park)
- Urban Neighborhood: The urban neighborhood place type is implemented with updated NR zoning to fulfill middle housing requirements in HB 1110[2] as well as implemented with upzones along frequent transit arterials. These concepts were part of Alternatives 4 and 5 in particular.
  - Like other action alternatives, the Preferred Alternative would allow unit lot subdivision in Neighborhood Residential zones.[3] This allowance meets state law and supports housing ownership opportunities and middle housing similar to other action alternatives.

Growth is directed and supported by new plan elements addressing land use, housing, economic development, utilities, transportation, climate change and resiliency, and more. The long term Seattle Transportation Plan concepts are implemented during the 20-year planning period by the Transportation Element and Capital Facilities Plan. The Seattle Transportation Plan EIS (February 2024) and this EIS consider these proposals in **Section 3.10 Transportation.**

[2] House Bill 1110 requires certain cities to allow middle housing types at minimum densities and requires certain development standards for middle housing. Now codified at RCW 36.70A.635-639.

[3] A unit lot subdivision (ULS) creates new lots in a short plat process, except a ULS allows flexible application of zoning dimensional standards. They are one method for dividing multiple housing units on a parcel into individual unit lots for sale to individual owners, providing fee simple homeownership, such as condominium units and townhomes. See: https://deptofcommerce.app.box.com/s/8i72so6zaxmlnmds3kg0dte72g6eehze.

Exhibit 1.4-6. Preferred Alternative Place Types



Source: City of Seattle, 2024.

1.4.9 Summary of Alternatives

Alternative Growth Comparisons

Alternative 1, No Action, studies the impact of adding 80,000 new homes and 158,000 jobs over 20 years, based on growth targets adopted by the King County Growth Management Planning Council.[4] Alternatives 2, 3, and 4 study a total housing growth of 100,000 housing units (20,000 more than Alternative 1, No Action) to account for the potential additional housing that could occur within neighborhood centers, urban neighborhood areas, or corridors. Alternative 5 and the Preferred Alternative assume~~s~~ growth of 120,000 housing units (40,000 more than the No Action Alternative) to account for the potential additional housing that could occur within the areas of change identified in Alternatives 2, 3, and 4 as well as changes to existing and new centers. All alternatives assume the same overall growth in jobs. See **Exhibit 1.4-7**.

Exhibit 1.4-7. 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
Housing	80,000	100,000	100,000	100,000	120,000	120,000
Jobs	158,000	158,000	158,000	158,000	158,000	158,000

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Under all alternatives, 80,000 units would be located in a similar distribution to Alternative 1, meaning that they would be located primarily in existing centers and villages. Under the action alternatives, an additional 20,000 or 40,000 housing units would be accommodated within new place types located throughout the city. This results in a shift in the percent share of growth between study areas. For example, while absolute housing growth in Downtown/South Lake Union (Area 4) is constant at 19,413 housing units for Alternatives 1–5, the percent share of housing growth in Area 4 is lower under all the action alternatives than the No Action Alternative. Under Alternative 5 and the Preferred Alternative, both Areas 1 and 2 in North Seattle receive a greater share of housing growth than Area 4. The Preferred Alternative includes less housing in Area 7 with South Park being designated a neighborhood center rather than an urban center. Area 4 has an assumption of 19,125 units under the Preferred Alternative, similar to and slightly lower than other studied alternatives. The expected growth distribution reflects zoning and capacity. **Exhibit 1.4-8** and **Exhibit 1.4-10** show percent share of housing ~~target~~ growth by study area and alternative, with the two highest study area percent shares under each alternative highlighted orange.

[4] Growth targets were set for the years 2019-2044, but in the EIS have been adjusted to match the required 20-year planning period for 2024-2044, to account for population, housing, and employment change for the years 2019-2023.

Exhibit 1.4-8. Housing Growth Estimates Percent Share by Study Area—Citywide Alternatives

Study Area	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Preferred
Area 1 Northwest	17.2%	18.4%	17.6%	17.2%	17.9%	21.4%
Area 2 Northeast	16.0%	18.3%	20.2%	21.0%	19.6%	19.6%
Area 3 West	7.5%	8.1%	6.7%	6.6%	6.8%	7.5%
Area 4 Downtown/South Lake Union	24.3%	19.4%	19.4%	19.4%	16.2%	15.9%
Area 5 East	16.6%	16.3%	13.8%	13.8%	13.4%	14.7%
Area 6 Southwest	7.7%	9.4%	10.2%	10.1%	11.5%	10.6%
Area 7 Duwamish Manufacturing Center	2.4%	2.3%	1.9%	2.0%	3.0%	1.3%
Area 8 Southeast	8.3%	7.9%	10.2%	9.9%	11.6%	8.9%
Total	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**

Note: The two highest percent shares under each alternative by study area are highlighted orange. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

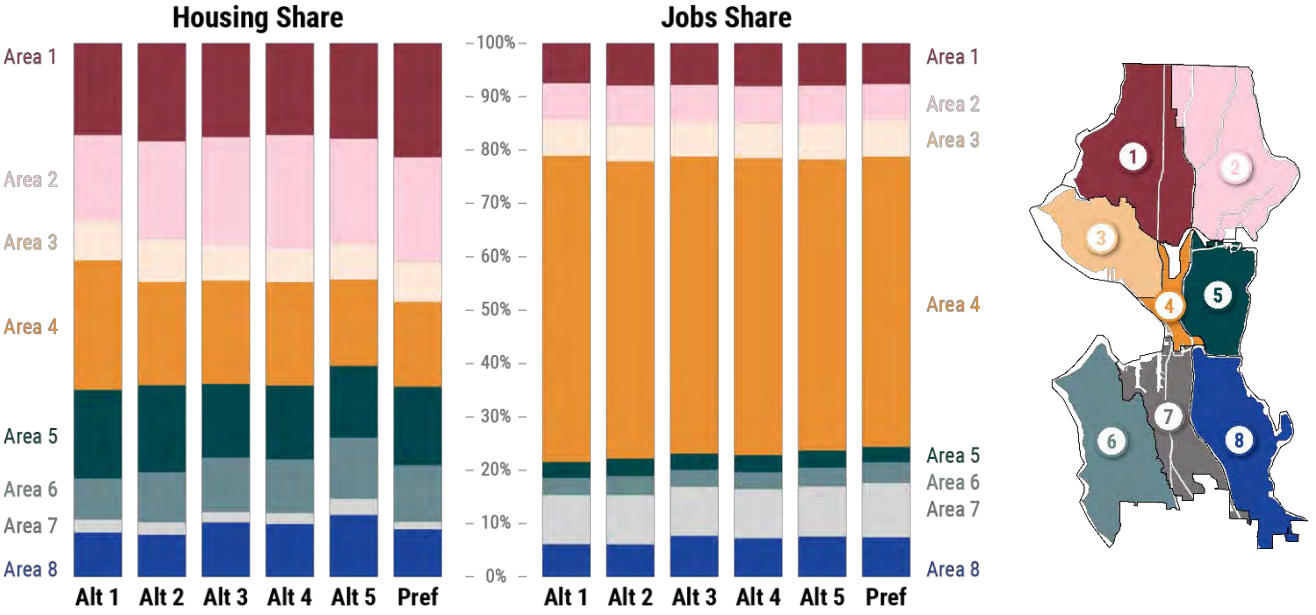
All alternatives assume the same overall growth in jobs with a little over half of job growth in Downtown/South Lake Union (Area 4) and about 9% in the Duwamish Manufacturing Center (Area 7). Alternatives 2, 3, and 4 assume a small job shift from the larger centers towards other place types to reflect local demand consistent with the distribution of new housing. The distribution of jobs and housing under Alternative 5 would be a combination of the other alternatives after accounting for expanded regional and urban center boundaries and potential changes to place type designations. The Preferred Alternative similarly focuses the bulk of jobs in Areas 4 and 7. There are slight shifts in jobs based on an evaluation of capacity and zoning. See **Exhibit 1.4-9** and **Exhibit 1.4-10**.

Exhibit 1.4-9. Job Growth Estimates Percent Share by Study Area—Citywide Alternatives

Study Area	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Preferred
Area 1 Northwest	7.5%	7.9%	7.8%	8.1%	7.9%	7.6%
Area 2 Northeast	6.9%	7.4%	6.9%	6.9%	7.2%	6.7%
Area 3 West	6.7%	6.9%	6.6%	6.6%	6.7%	6.9%
Area 4 Downtown/South Lake Union	57.4%	55.7%	55.7%	55.7%	54.6%	54.4%
Area 5 East	3.0%	3.3%	3.1%	3.2%	3.2%	2.9%
Area 6 Southwest	3.2%	3.5%	3.2%	3.2%	3.5%	3.9%
Area 7 Duwamish Manufacturing Center	9.2%	9.2%	9.2%	9.2%	9.3%	10.1%
Area 8 Southeast	6.1%	6.1%	7.7%	7.2%	7.6%	7.4%
Total	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**

Note: The two highest percent shares under each alternative by study area are highlighted orange. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Exhibit 1.4-10. Comparison of Housing and Jobs Growth Estimates Percent Share by Study Area—Citywide Alternatives



Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Major Policy Updates

The proposal would update the Seattle Comprehensive Plan to address growth between 2024 and 2044 and ~~adapt~~adopt new policies and codes that help meet the objectives defined in **Section 1.4.** It would also implement text and map amendments to the Comprehensive Plan as well as changes to zoning and development standards in the Seattle Municipal Code and the Building Code. Changes to the Comprehensive Plan would help meet the objectives defined in **Section 1.4.1** and would influence the manner and distribution of projected growth as well as the manner in which the City conducts its operations to promote and achieve other goals such as those related to equity, economic opportunity, environmental sustainability, community, public health, safety, welfare, and service delivery. All Comprehensive Plan elements will be reviewed and updated as part of the proposal. In many cases, proposed policy amendments will reflect changes to state and regional requirements and guidance, incorporate language and editorial changes to policies to increase readability, clarify direction and remove redundancies; and add new or updated information since adoption of the current Comprehensive Plan.

Changes to the Comprehensive Plan could include, but are not limited to:

- Implementing a major update of the Growth Strategy and Future Land Use Map including:
  - Adding neighborhood centers, corridors, and urban neighborhoods as new place types.
  - Combining the multifamily and mixed-use/commercial designations on the Comprehensive Plan's Future Land Use Map categories.
- Updating planned growth assumptions to reflect updated regional targets, market conditions, development capacity, and changes to the growth strategy.

- Updating housing and employment targets for regional centers consistent with VISION 2050.
- Eliminating Growth Targets for urban villages or modifying them to reflect changing market conditions, development capacity, and changes to the growth strategy.
- Identifying strategies for addressing displacement.
- Identifying strategies for meeting jurisdictional affordable housing targets.
- Identifying strategies for meeting additional infrastructure needs.
- Identifying strategies for meeting vehicle miles traveled (VMT), mode shift, and greenhouse gas emission goals.
- Updating the Transportation levels-of-service (LOS) to reflect updated goals, new state guidance, changing conditions, and address concurrency. The long-term Seattle Transportation Plan concepts are implemented during the 20-year planning period by the Transportation Element and Capital Facilities Plan. The Seattle Transportation Plan EIS (February 2024) and this EIS consider these proposals in **Section 3.10 Transportation.**
- Removing volume 2 of the Comprehensive Plan which contains goals and policies excerpted from past neighborhood plans.
- Adding or modifying policies for the growth strategy place types and zone categories.
- Modifying or implementing new policy changes on a wide variety of topics such as equity, complete communities, increasing housing choices, climate change resilience, greenhouse gas reduction strategies, vision zero, zero waste, electrification, decarbonization, essential public facilities, environmentally critical areas, or other topics.

Changes to the Seattle Municipal Code would implement the Growth Strategy in the Comprehensive Plan as well as specific goals and policies, particularly those around land use regulations and housing. Changes to zoning and development standards would support City goals such as allowing more people to walk or bike to everyday needs, encouraging better building design, or reducing the cost of housing. These changes could include, but are not limited to:

- Modifying heights, floor area ratios, lot size, density limits, coverage limits, setbacks, amenity standards, building separations, structure depth, structure width, and other similar standards affecting the scale and form of new construction to implement goals and policies in the update Comprehensive Plan including those around increasing the supply, diversity, and affordability of housing.
- Creating a new Midrise zone.
- Adding or modifying design standards.
- Allowing more flexibility for commercial uses in certain areas such as allowing more retail on arterial streets, increasing flexibility for home businesses, and allowing small-scale commercial uses~~corner stores~~ in Urban Neighborhood Residential and Lowrise zones.
- Allowing more height and/or floor area for projects that provide public open space or that include affordable housing or housing types such as 3- and 4-story stacked flats or projects with shared open space.
- Updating rezone criteria.
- Reducing or eliminating residential parking minimums citywide.

- Modifying bike parking requirements to recognize the unique conditions across different zones and housing types.
- Modifying solid waste storage requirements to recognize current solid waste needs and to recognize the unique conditions across different zones and housing types.
- Modifying tree and landscaping requirements to increase tree canopy in Neighborhood Residential zones.
- Modifying ~~building code~~ regulations to support development of attached and stacked flat units.
- Implementing or modifying Mandatory Housing Affordability (MHA) requirements.
- ~~Updating tenant relocation assistance requirements to increase support for relocated households.~~
- ~~Updating our transportation concurrency requirements to reflect changes to the level-of-service standard.~~
- Changes to support electric vehicle charging when parking is provided.

Changes to the Comprehensive Plan ~~could~~ also implement changes required by state legislation including HB 1110, which requires cities to allow a minimum number of housing units on certain lots and restricts design review and development standards for middle housing, as well as SB 5412, which updates SEPA categorical exemptions and requires certain environmental analysis. See **Appendix C** for a list of codes acting as mitigation which can address SB 5412 provisions as well as allowances for raising SEPA thresholds per WAC 197-11-800(1)(c).

See **Appendix J** for proposed legislation considered in the conceptual blocks and urban form analysis in **Section 3.6 Land Use Patterns & Urban Form**.

130th/145th Station Area

This EIS also provides a focused review of potential land use and zoning changes to implement the 130th and 145th Street Station Area Plan and options for the City to streamline future environmental review in that area, which may include a planned action (RCW 43.21c.440), infill exemption (RCW 43.21C.229), or other tools available under state legislation (e.g., SB 5818).

Alternative land use concepts have been paired up with citywide alternatives for review in the EIS. **Exhibit 1.4-11** summarizes the land use concepts under ~~the~~ Alternative 1, No Action and the ~~two~~ three alternatives that have a more detailed approach in the 130th/145th Station Area.

- Alternative 1 retains the current Comprehensive Plan and zoning designations. No new areas would be designated for mixed-use or higher density and building types outside existing commercial zoning would remain primarily single purpose with some 4-8 story multi-family uses near the 145th BRT station.
- Compared to Alternative 1, Alternative 2 would have more mixed-use development in three new neighborhood centers—one near the 145th Station Area, one immediately to the east of I-5 and one around an existing business district (referred to as the Pinehurst Neighborhood Center). Most of the housing proposed under Alternative 2 would be near the 145th Station

Area and job growth would be modest. The neighborhood centers would contain a mix of Low-rise Residential, Midrise Residential, and Neighborhood Commercial 3 (NC3) zoning.

- Under Alternatives 3 and 4, changes in the 130th/145th station areas would be consistent with the changes described citywide.
- Under Alternative 5 and the Preferred Alternative, an urban center would be created straddling the west and east sides of I-5 at the Sound Transit light rail station at 130th with Low-rise Residential, Midrise Multifamily, and Neighborhood Commercial (2 and 3) zoning. The 130th Station Area would see the greatest increase in housing and job growth under Alternative 5 and the Preferred Alternative. Similar to Alternative 2, the 145th Station Area would be designated as a neighborhood center under Alternative 5 and the Preferred Alternative with similar zoning and housing growth and slightly fewer jobs.

Exhibit 1.4-11. Summary of Alternatives—130th/145th Station Areas

Feature	Alternative 1: No Action (aligns with citywide Alt 1)*	Alternative 2: Focused (aligns with citywide Alt 2)*	Alternative 5: Combined (aligns with citywide Alt 5)*	Preferred Alternative
Amount** and Pattern of Growth	Baseline growth and pattern. Growth in housing units: 840 Growth in jobs: 716	Cluster growth in newly designated small mixed-use node(s) and near transit. Growth in housing units: 2,208 Growth in jobs: 979	Potential new urban center and corridor designations. Residential areas growth. Growth in housing units: 2,703 Growth in jobs: 1,004	Similar to Alt 5. Growth in housing units: 2,152 Growth in jobs: 658
Building Types for New Construction	No change (single family, accessory dwelling units, limited multifamily and mixed use).	Denser and taller buildings in nodes. More mixed-use buildings.	Denser than Alt 2 with more mixed-use buildings and more home type variety.	Similar to Alt 5.
Building Heights for New Construction	No change Multifamily and mixed use: 45–80 ft Neighborhood Residential zones: 30 ft	Nodes: Potentially up to 40–80 ft Neighborhood Residential zones: 30 ft	Urban center: 95 ft Neighborhood Center~~Corridors~~: Potentially up to 40-80 ft Urban Neighborhood Residential zones: 30 ft	Urban Center: 85 ft Neighborhood Center: 40-75 feet Urban Neighborhood: 32 feet
Retail and Commercial	No change	Could include more retail and commercial locations than Alt 1.	More retail and commercial locations than Alt 2.	Similar to Alt 5.

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—a minor correction made to Alternative~~s~~ 5 is shown in tracks.

* Alternative 1, No Action, would retain the City's Seattle 2035 urban village strategy and center/village designations—the existing urban centers and villages are categorized here according to the new place types proposed under Alternatives 2-5 and the Preferred Alternative for comparison purposes only. See **Exhibit 2.1-1** in **Chapter 2** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.

** The growth estimates consider the current zoning within a common maximum boundary (Alternative 5 and the Preferred Alternative). The 130th Street and Pinehurst Neighborhood Center from Alternative 2 are both within the 130th Street Urban Center boundary in Alternative 5 and the Preferred Alternative.

Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.



Source: City of Seattle 130th and 145th Station Area Planning Multimodal Mobility Study, December 2020.

In addition to establishing future land use and zoning designations supporting the station area, the City's Station Area Plan provides direction on key policy issues:

- Land Use/Housing
  - Provide more density/diversity of land uses concurrent with transit.
  - Provide more housing choice.
  - Offer affordable housing options near light rail and Bus Rapid Transit (BRT).
  - Mitigate displacement of current residents and businesses
- Amenities/Public Realm
  - Coordinate update of street types in Streets Illustrated.
  - Establish a strong visual identity for the station areas, including architecture, landscape design, public art, and other public realm improvements as well as neighborhood wayfinding.
  - Provide amenities to support anticipated growth.
  - Retain tree canopy and healthy open spaces/environment.
- Access
  - Provide non-motorized access to the stations (safe etc.).
  - Coordinate with WSDOT, Sound Transit, and City of Shoreline.
  - Address parking regulations.

1.5 Key Issues & Options

The key issues facing decision makers include:

- Creation of a growth concept that meets objectives of the plan to create an equitable, livable, inclusive, and climate resilient community. The growth concept would offer greater housing choices across the city and an improved job-housing balance. It links to investments in transit and non-motorized improvements.
- Approval of a Comprehensive Plan including goals and policies that fulfill Seattle's vision and meet state and regional requirements.
- Approval of development regulations that implement the Comprehensive Plan goals, policies, and land use plan, resulting in quality urban design, and integrating the best available science to protect critical areas.
- Approval of SEPA facilitation tools to help incentivize growth while mitigating impacts for the 130th/145th Station area and other areas of the community.

1.6 Summary of Impacts & Mitigation Measures

Environmental Impacts

This section provides a summary of each environmental topic addressed in this EIS. This includes:

- Earth & Water Quality
- Air Quality/GHG
- Plants & Animals
- Energy & Natural Resources
- Noise
- Land Use Patterns
- Historic Resources
- Population, Employment, & Housing
- Transportation
- Public Services & Utilities

For the full context of the affected environment, potential impacts, and mitigation measures please see **Chapter 3**.

Equity & Climate Considerations

The City is seeking to develop a Comprehensive Plan that results in more equitable outcomes, reduces harms, and supports community-wide benefits created by growth and investment.

The Growth Management Act (GMA) now requires each county and city give special consideration to achieving environmental justice in its goals and policies, including efforts to avoid creating or worsening environmental health disparities.

> *"Environmental justice" means the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to development, implementation, and enforcement of environmental laws, regulations, and policies. Environmental justice includes addressing disproportionate environmental and health impacts in all laws, rules, and policies with environmental impacts by prioritizing vulnerable populations and overburdened communities and the equitable distribution of resources and benefits.*

GMA requires a series of elements including land use, housing, transportation, utilities, capital facilities, parks and recreation, economic development and recently, climate change and resiliency. The Comprehensive Plan provides policies that are considered in the exercise of the City's authority under SEPA; see Seattle's SEPA Policies at SMC 25.05.665.

As part of the scoping process in Fall 2022, the City identified climate and equity metrics that were to be addressed in the EIS analysis. In addition, for each environmental topic thresholds and metrics were developed to address the elements of the environment proposed during EIS scoping including those identified in WAC 197-11-444 and WAC 197-11-960.

For each environmental topic this summary describes an analysis of equity and climate performance criteria associated with that topic.

1.6.1 Earth & Water Quality



Source: City of Seattle, 2023.

How did we analyze Earth & Water Quality?

The EIS team reviewed documents and maps identifying critical areas, surface water, shorelines, groundwater, sea level rise, and environmental health. Thresholds of significance utilized in this impact analysis include:

- Runoff Increases: Impervious surface expansions that would increase 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.
- Environmental Earth and Soil Hazards: Disturbances of existing contaminated areas to levels that could endanger human health or the environment.
- Climate Change—Extreme Precipitation: Growth concentrated into areas that are reasonably expected to be at risk for future flooding and landslides.
- Climate Change—Sea-level Rise: Growth concentrated into areas that are reasonably expected to be at risk for future sea-level rise.

What impacts did we identify?

Every alternative would increase density in the city boundary and likely result in increased vehicle use, increased hard surfaces, and focus additional development closer to water resources. However, the redevelopment associated with each plan alternative would comply with City codes requiring stormwater management, critical area protections, building upgrades, and other measures to avoid or minimize potential impacts to earth and water resources.

Direct: Direct impacts relate to the development that could be allowed by each alternative over the 20-year planning period.

- Construction impacts—Construction activities can involve removal of vegetation and soil disturbance, causing erosion, water quality impacts, and potential for soil contamination. Construction activities and associated rainfall runoff controls are required to meet permitting requirements that should prevent or minimize adverse impacts.
- Vehicle Use—All of the plan alternatives would result in increased vehicle use. Higher numbers of vehicle trips can potentially increase contamination of local receiving waters, depending on the level of stormwater runoff treatment provided to the roadways.
- Hard Surfaces—All of the plan alternatives would result in an increase in the amount of hard surface (i.e., parking, buildings, etc.) in the city. The amount of hard surface versus vegetation in each place type impacts the way rainwater runoff mixes with potential pollution and soaks into the earth or is transported to natural receiving waters.

Indirect: Indirect impacts potentially occur as a result of the proposed action and are reasonably foreseeable, but they occur later in time or farther removed in distance. Indirect impacts on earth and water resources generally come from each alternative's potential indirect changes to pollutant sources and land cover through changes to the pattern and locations of population density and growth rate. As outlined in Vision 2050 (PSRC, 2020), focusing growth in previously developed urban areas will result in less impact on regional earth and water resources than focusing the same growth in previously undeveloped areas outside of cities that add new impervious surfaces controlled under current standards. Overall, the indirect effect from every alternative is considered beneficial to earth and water resources in the region that includes the city and areas beyond.

What is different between the Alternatives?

Citywide

As discussed in the previous section, increases in vehicle use and hard surfaces may result in direct impacts to earth and water resources by potentially increasing pollution and stormwater runoff, respectively. **Exhibit 1.6-1** summarizes these characteristics for each plan alternative. Expected changes to single-occupancy vehicle trips that are used as an indicator of potential increased pollution from vehicles~~. Increases in single-occupancy vehicle trips are presented in **Exhibit 1.6-1**, which is~~ are based on data from **Section 3.10 Transportation**. ~~Alternative 1 has~~

~~the lowest studied housing units and Alternative 5 the most, with Alternatives 2-4 moderate in growth. Thus, the potential for pollution due to single-occupancy vehicle trips matches this range. Factors that are used as gauges of i~~Increased hard surfaces ~~are summarized in **Exhibit 1.6-1** and include~~are based on number of housing units and distribution of ~~housing~~ development (new housing development ~~is assumed to create more hard surfaces when it~~ that is spread widely ~~into~~ across areas like Neighborhood Residential rather than concentrated into centers is assumed to create more hard surfaces). Additional considerations of changes in land cover, including changes in vegetation, are discussed in **Section 3.3 Plants & Animals**.

Exhibit 1.6-1. Impacts Based on Expected Pollution and Runoff Increases

Metric	Alt. 1	Alt.2	Alt.3	Alt.4	Alt.5	Pref. Alt.
Pollution Indicator: Daily Single-Occupancy Vehicle Trips (millions)	1.78	1.85	1.85	1.85	**1.91**	**1.89**
Hard Surface Indicator: Housing Units	80,000	100,000	100,000	100,000	**120,000**	**120,000**
Hard Surface Indicator: ~~Share~~ Distribution of Development~~table Acres~~						
Existing Centers* (continued development with no place type change)	~~58~~57%	58%	58%	58%	58%	36%
Plan Additions: Centers & Corridors** (hard surfaces are expected increase in these areas)	0%	6%	0%	15%	**20%**	**24%**
Neighborhood Residential** (hard surfaces are expected increase in these areas)	0%	0%	**29%**	0%	13%	**40%**
Outside Subareas*** (continued development with no place type change)	42%	36%	13%	27%	9%	0%****
Impact of Alternative Compared to No Action	**Baseline**	**Lowest Impact**	**~~Highest~~ High Impact**	**Moderate Impact**	**~~Highest~~ Higher Impact**	**Highest Impact**

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—edits made to the row headings and Alternatives 1–5 are shown in tracks.
* "Existing Centers" are shown to clarify that these areas present in the Baseline will also be present in each plan alternative. They are not a differentiator between the baseline and plan alternatives.
** "Plan Additions: Centers and Corridors" and "Neighborhood Residential" are new elements that are part of the plan alternatives and are included in the impacts analysis.
*** "Outside Subareas" include~~s~~ all areas outside the other listed geographies and are typically parks, major institutions, and some residential areas. Alternatives 1-5 would not ~~No~~ change the ~~to~~ place type in ~~is proposed in~~ these areas, though growth in the residential areas ~~will~~ would continue ~~to occur~~ under current zoning throughout the 20-year planning period. See also note ****.
**** See **Exhibit 2.4-26**. Under the Preferred Alternative, the same 3,854 acres of "Outside Subareas" as Alternatives 1-5 are technically classified as new place type—neighborhood center, urban neighborhood, or frequent transit corridor place types. This includes areas where residential development will not occur, such as parks and major institutions. The potential for and extent of development in these areas under the Preferred Alternative would be similar to Alternatives 1-5 as no substantial shift is expected from currently allowed development patterns.
Source: City of Seattle, 2024~~3~~; Parametrix, 2024; BERK, 2024~~3~~.

Equity & Climate Vulnerability Considerations

Several areas of the city rank high (in the upper half of the scoring range) for environmental health disparities. Redevelopment in these areas associated with the plan alternative could have both beneficial and detrimental impacts to the population in these areas, as follows:

- Exposure to Contaminated Sites: In areas with environmental health disparities, redevelopment allowed by the studied alternatives could have both beneficial and detrimental impacts to the population in these areas. Redevelopment can sometimes pose a risk of exposure from contaminated sites or motivate additional clean-up and protection, depending on the scale of the project. The City regulates development around known contaminated sites.
- Water Quality: Redevelopment often triggers requirements to upgrade stormwater management to meet current standards, which can either avoid impacts or result in a benefit to earth and water resources, and in turn to those living in the surrounding community. Alternative 1 would have the least potential for equitable investments in stormwater quality improvements with the level of housing units compared to Alternative 5 and the Preferred Alternative with the most and Alternatives 2 to 4 moderate potential. However, each of the plan alternatives could have increased environmental impacts where development density is focused in closer proximity to water resources.
- Flooding and Landslides: Where redevelopment would trigger installation of newer stormwater infrastructure as described above, that infrastructure can be designed to be more resilient to changes in rainfall frequencies and volumes, thereby lowering the flood risks for the community. While Alternative 1 retains current plans and regulations, the action alternatives advance the City's climate resilience with a new climate element based on a climate vulnerability assessment.
- Sea-Level Rise: Areas currently at risk for sea level rise are in Area 7 along the Duwamish River. There is a potential for sea level rise and storm surge risks elsewhere in Areas 1, 3, 4, and 6. Alternative 1 tends to have less growth in these areas and Alternative 5 and the Preferred Alternative the most. In Area 3, the growth under Alternative 2 would be similar to Alternative 5 and the Preferred Alternative. However, action alternatives would include a new climate element required under the Growth Management Act (GMA) and climate resilience strategies to direct growth away from shorelines.

130th/145th Station Area

The 130th/145th Station Area is in close proximity to Thornton Creek, and runoff from these areas is in the associated regulated stream basin.

- Alternative 1, No Action, would have the lowest potential land cover conversions of vegetation to hard surface, the lowest expected increase in daily vehicle trips, and would focus increased density farther away from water resources than all other alternatives.
- Alternative 2 would have neighborhood center development in the station area. Alternative 2 would have the least potential land cover conversions of vegetation to hard surface, the lowest expected increase in daily vehicle trips, and would focus increased density farther

away from water resources than all other action alternatives. Alternative 2 presents the lowest potential for direct impacts on earth and water resources within the 130th/145th Station Area among the action alternatives.

- In Alternative 5 and the Preferred Alternative, the 130th/145th Station Area would specifically include areas to be reclassified as an urban center and would have relatively higher potential land cover conversions of vegetation to hard surface, the highest expected increase in daily vehicle trips, and would focus the highest amount of increased density closer to water resources than all other action alternatives.

What are some solutions or mitigation for impacts?

The Comprehensive Plan includes policies relevant to the city-wide protection and restoration of earth and water resources. Action alternatives would amend all elements as part of the Periodic Update; this includes similar and improved policies addressing earth and water resources particularly related to climate resilience.

In addition to new Comprehensive Plan policies under action alternatives and existing codes and regulations addressing critical areas and stormwater, and emergency preparedness, the City could consider:

- Continued implementation of SDOT policy to avoid adding or expanding roadways through transit and other approaches.
- Strengthen critical areas ordinances and restore critical area buffers.
- Update the Shoreline Master Program to increase sea-level rise resiliency actions (such as construction of barriers or property acquisitions) by basing boundaries and elevation restrictions on the Mean Higher High Water Mark (the average of the higher daily tides) or some other metric higher than the Ordinary High Water Mark.
- Install updated stormwater controls on roadways, which are not likely to be upgraded as part of the parcel redevelopments included in the alternatives.
- Continue research and implementation of innovative stormwater best management practices, especially those focused water quality treatment in the most urban areas.
- Implement the Puget Sound Partnership Action Agenda and Water Resource Inventory Area Salmon Recovery/Habitat Protection plans.
- Continue to implement PSRC's Four-Part Strategy to reduce greenhouse gas emissions.
- Implement the One Seattle Climate & Environment Element, address climate resilience based on City studies, update the Climate Action Plan.
- Address hazard mitigation planning and associated regulations.

With mitigation, what is the ultimate outcome?

Land cover across most of the city has been extensively modified for over a century by development, which has already resulted in long-term impacts to earth and water resources. Redevelopment of these areas associated with every ~~project~~ alternative would be required to install permanent stormwater management systems to mitigate potential impacts from changes to the site runoff. These required stormwater management measures are designed to minimize pollution at the source; remove or reduce the amounts of pollutants in the stormwater before it enters the receiving water; or manage the rate at which stormwater flows into a receiving water, the separated storm conveyance system, or the combined sewer system. Furthermore, the comprehensive future planning associated with the ~~project~~ alternatives that would focus growth in the city's already developed area as opposed to allowing that same growth to impact more rural, undeveloped areas is also expected to be beneficial to earth and water resources. Therefore, no significant unavoidable adverse impacts to earth and water resources are expected.

Summary of Thresholds

Exhibit 1.6-2 summarizes the results of the evaluation of potential impacts based on the evaluation in **Section 3.1 Earth & Water Quality**.

Exhibit 1.6-2. Earth & Water Quality Summary of Thresholds of Significance

Metric	Threshold	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref.
	Surface Water Quality: Impervious surface expansions; and increases in amount of pollution.[1]	▽	▽	▼	▽	▼	▼
	Groundwater Quality: Impervious surface expansions that would decrease groundwater recharge and increases in amount of pollution discharged.[1]	▽	▽	▼	▽	▼	▼
☒ Equity & Climate	Environmental Earth and Soil Hazards: Disturbances of existing contaminated areas to levels that could endanger human health or the environment.[2]	▽	▽	▽	▽	▽	▽
☒ Equity & Climate	Climate Change—Extreme Precipitation: Growth focused into areas that are reasonably expected to be at risk for future flooding and landslides.[3]	▼	▽	▽	▽	▽	▽
☒ Equity & Climate	Climate Change—Sea-level Rise: Growth focused into areas that are reasonably expected to be at risk for future sea-level rise.[4]	▼	▽	▽	▽	▽	▽

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative was added to this exhibit, and associated analysis in the notes, since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.

1 All alternatives would increase hard surfaces (i.e., parking, buildings, etc., known as impervious surfaces). Each alternative allows development density in closer proximity to water resources. Alternatives 3 and 5 and the Preferred Alternative could result in more impervious areas and less tree canopy than other alternatives. Alternative 5 could result in more pollution due to higher growth and vehicle trips than other alternatives. Considering the pattern of density of the alternatives illustrated in **Exhibit 3.1-14** to **Exhibit 3.1-16** in **Section**

3.1.2, Alternative 1 would have the lowest level of redevelopment compared to Alternative 5 and the Preferred Alternative with the most and Alternatives 2 to 4 with medium amounts. Seattle Stormwater Manual requirements would apply and are shown in Exhibit 3.1-17.
2 Redevelopment can sometimes pose a risk of exposure from contaminated sites or motivate additional clean-up and protection, depending on project scale. The City regulates development around known contaminated sites.
3 Where redevelopment would trigger installation of newer stormwater infrastructure, it can be designed to be more resilient to changes in rainfall frequencies and volumes. Alternative 1 retains current plans and regulations, action alternatives including the Preferred Alternative advance the climate resilience policies and strategies.
4 Current codes are based on current water surface elevation metrics and may not fully address resiliency to potential impacts from forecasted sea-level rise. Alternative 5 and the Preferred Alternative could result in exposure of more people to sea level rise. Compared to Alternative 1, the action alternatives would potentially have less risk of sea level rise exposure to communities because of new climate element and resilience strategies and direct growth away from shorelines.

1.6.2 Air Quality & GHG Emissions

How did we analyze Air Quality & GHG Emissions?

The EIS evaluates the air quality impacts of implementing the alternatives and focuses on two criteria air pollutants: carbon monoxide (CO) and particulate matter (PM) resulting from changes in land uses and transportation patterns. It also considers other criteria air pollutants such as ozone precursors (reactive organic gases, ROGs, and oxides of nitrogen, NOx) and Toxic Air Pollutants (TAPs).

The project team collected data from the following sources to support analysis of existing air quality conditions and potential effects of the ~~project~~ alternatives:

- U.S. Environmental Protection Agency Greenbook (EPA, 2021)
- Puget Sound Clean Air Agency (PSCAA) and Ecology Air Monitoring Network
- 2016-2021 PSCAA Air Quality Data Summaries (PSCAA)
- 2020 Community Greenhouse Gas Emissions Inventory (Seattle, 2022)
- Washington Department of Ecology Air Quality Standards and Greenhouse Gas Emissions Inventory (Ecology, 2022a and 2022b)

Mobile emissions were estimated using the EPA's Motor Vehicle Emission Simulator (MOVES) model.

The thresholds of significance utilized in this impact analysis include:

- Air Pollution: Growth concentrated in areas with high exposure to air pollution.
- Per Capita GHG emissions: Increase in GHG emissions on a per capita basis.
- Consistency with other efforts: Actions would prevent or deter statewide, regional, or local efforts to reduce GHG emissions.

What impacts did we identify?

Construction: Future growth under any alternative would result in development of new residential, retail, light industrial, office, and community/art space and associated emissions

generated during construction activities would include exhaust emissions from heavy duty construction equipment, trucks used to haul construction materials to and from sites, worker vehicle emissions, as well as fugitive dust emissions associated with earth-disturbing activities, and other demolition and construction work. Criteria air pollutants would be emitted during construction activities from demolition and construction equipment, much of it diesel-powered, trucks used to haul construction materials to and from sites, and from vehicle emissions generated during worker travel to and from construction sites.

Construction-related GHG emissions from any given development project that may occur in the next 20 years would be temporary and would not represent an on-going burden to the City's inventory. However, cumulatively it can be assumed that varying levels of construction activities within the city would be ongoing under any of the plan alternatives and hence, cumulative construction related emissions would be more than a negligible contributor to GHG emissions within the city.

Transportation: All action alternatives result in roughly the same annual GHG emissions. The variation is within approximately one half of one percent. This is because the projected improvements in fuel economy outweigh the projected increase in VMT. Therefore, roadway emissions are considered a minor adverse impact.

What is different between the Alternatives?

Citywide

GHG emissions would differ among the alternatives with the lowest total emissions under Alternative 1 and the most under the Preferred Alternative ~~5~~. Alternatives 2, 3, and 4 have the same growth. On a per capita basis, Alternative 1 would have the most and Alternative 5 would have the least. The Preferred Alternative is lower than Alternatives 2 through 4 and similar to but slightly higher than Alternative 5. See **Exhibit 1.6-3**.

Exhibit 1.6-3. GHG Emissions ($MTCO_2e$) by Alternative and Per Capita Rate

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref. Alt.
Transportation	-1,662	-834	-835	-835	176	294
Buildings	372,474 ~~48,422~~	388,378 ~~50,489~~	391,736 ~~50,926~~	389,644 ~~50,654~~	406,041 ~~52,785~~	415,152
Waste	60,834	64,053	64,294	64,294	67,917	69,683
Total Emissions	**431,647** ~~107,594~~	**451,597** ~~113,708~~	**455,196** ~~114,385~~	**453,104** ~~114,113~~	**474,134** ~~120,878~~	**485,128**
Population Growth Estimate	164,000	205,000	205,000	205,000	246,000	246,000
Per Capita GHG Emissions	**2.63** ~~0.66~~	**2.20** ~~0.55~~	**2.22** ~~0.56~~	**2.21** ~~0.56~~	**1.93** ~~0.49~~	**1.97**

Notes: Population growth calculated using City GIS data for total housing units and population (total units/population = persons per household), assuming 2.05 persons per household. The Preferred Alternative was added to this exhibit since the Draft EIS—edits made to Alternatives 1–5 are shown in tracks.
Source: Kimley-Horn, 2025. ~~3~~



Source: City of Seattle, 2023.

Equity & Climate Vulnerability Considerations

Portions of Seattle located along major roadways (freeways and the most-traveled highways) are exposed to relatively high levels of air borne toxics, resulting in high cancer risk values. Risks and hazards drop dramatically in places farther than 200 meters (656 feet) from the center of highways; for the EIS, a buffer area of 500 to 1,000 feet has been considered from roads with daily trips greater than 100,000 vehicles to identify potential exposure of sensitive populations to air toxics; this includes Interstate 5 north of Interstate 90. Within the "buffer" study area, the potential for dwelling units is described for each alternative:

- Under Alternatives 1, 3, and 4, the number of dwelling units within the portion of urban centers and villages in the 1,000-foot buffer area would be the lowest.
- Alternative 2 would place a greater number of dwelling units within the 1,000-foot buffer when compared to Alternative 1, 3, and 4, but fewer units compared to Alternative 5 and the Preferred Alternative.
- The Preferred Alternative ~~5~~ would place the greatest number of dwelling units within the 1,000-foot buffer when compared to the other Alternatives. Alternative 5 would place a greater number of units within the 1,000-foot buffer when compared to Alternatives 1 through 4 but less within the 1,000-foot buffer when compared to the Preferred Alternative.

130th/145th Station Area

Zoning designations under **Alternative 1** would be retained within the 130th/145th Station Area and no new areas will be designated for mixed-use or higher density than exists under existing conditions. Implementation of Alternative 1 assumes a growth potential of 840 housing units and 716 jobs in proximity to the future light rail and BRT stations.

- **Construction:** Station Area growth under Alternative 1 would be the lowest compared to all other alternatives. Therefore, emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust would likely be the lowest among all alternatives.
- **Operations—Criteria Pollutants:** Transit has been identified as the most frequent and successful tool in reducing VMT (WSDOT, 2022). Transit improvements overall provide a VMT reduction of up to 2.6% (WSDOT, 2022). Therefore, transit service and connectivity provided by the future light rail and BRT stations in combination with Alternative 1 growth potential, in comparison to baseline conditions, would result in improved transit service and connectivity when compared to existing conditions, providing greater potential for VMT reduction and reductions in criteria pollutants.
- **Operations—Greenhouse Gas Emissions:** Transit service and connectivity provided by the future light rail and BRT stations in combination with Alternative 1 growth potential, in comparison to baseline conditions, would result in improved transit service and connectivity when compared to existing conditions, providing greater potential for VMT reduction and reductions in GHG emissions. The housing growth potential under Alternative 1 would be the lowest compared to all other alternatives. Therefore, GHG emissions associated with building energy use and solid waste would be lowest under Alternative 1.
- **Exposure to Pollution**: Several urban centers and urban villages are located within 1,000-feet of roadways with greater than 100,000 daily vehicles. Compared to all other alternatives, the number of units within the affected urban centers and villages would be the lowest. ~~Target growth under Alternative 2 within the Station Area would be greater than Alternative 1 and would place a greater number of residents in proximity to transportation-related pollutants along I-5. Compared to Alternative 5, Alternative 2 would place a fewer number of residents in proximity to transportation-related pollutants along I-5.~~

Implementation of **Alternative 2** assumes a growth potential of 2,208 housing units, which is greater than the growth potential of Alternative 1.

- **Construction:** Emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust would likely be greater than Alternative 1 and less than Alternative 5 based on the ~~target~~ growth in dwelling units. Implementation of the Preferred Alternative assumes a growth level similar to Alternative 2, and, therefore emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust would be similar to Alternative 2.
- **Operations—Criteria Pollutants:** Increased growth potential within neighborhood centers combined with improvements to transit service and connectivity, when compared with Alternative 1, would result in greater potential for VMT reduction and reductions in criteria pollutant emissions. The Preferred Alternative would have similar results as Alternative 2.

- **Operations—Greenhouse Gas Emissions:** As stated above, increased growth potential within neighborhood centers combined with improvements to transit service and connectivity, when compared with Alternative 1, would result in greater potential for VMT reduction, resulting in reductions in GHG emissions. However, ~~target~~ growth within the Station Area under Alternative 2 would be greater than Alternative 1, resulting in higher emissions related to building energy consumption and solid waste generation. Under the Preferred Alternative, Station Area growth would be similar to Alternative 2, likely resulting in similar emissions related to building energy consumption and solid waste generation (lower than Alternative 5).
- **Exposure to Pollution**: ~~Target g~~Growth under Alternative 2 within the Station Area would be greater than Alternative 1 and would place a greater number of residents in proximity to transportation-related pollutants along I-5. Compared to Alternative 5, Alternative 2, as well as the Preferred Alternative, would place a fewer number of residents in proximity to transportation-related pollutants along I-5.

Under **Alternative 5**, an urban center designation on both the west and east sides of the 130th Station Area would merge with an existing commercial node to expand residential mixed use near the station. Implementation of Alternative 5 assumes a growth potential of 2,703 housing units, which is greater than all other alternatives.

- **Construction:** Station Area growth under Alternative 5 would be the greatest compared to all other alternatives. Therefore, emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust would likely be the highest among all alternatives.
- **Operations—Criteria Pollutants:** Increased growth potential within urban centers combined with improvements to transit service and connectivity provided by the stations, when compared with all the other alternatives, would result in greatest potential for VMT reduction and reductions in criteria pollutant emissions.
- **Operations—Greenhouse Gas Emissions:** As stated above, Station Area growth under Alternative 5 would result in the greatest potential for VMT reduction and reductions in transportation-related GHG emissions. However, Station Area growth would be the highest under Alternative 5, likely resulting in the highest emissions related to building energy consumption and solid waste generation.
- **Exposure to Pollution**: ~~Target g~~Growth under Alternative 5 within the Station Area would be the greatest compared to all other alternatives and would potentially place the greatest number of residents within close proximity to transportation-related pollutants along I-5.

The **Preferred Alternative**, like Alternative 5, includes an urban center designation on both the west and east sides of the 130th Station Area would merge with an existing commercial node to expand residential mixed use near the station. Implementation of the Preferred Alternative assumes a growth potential of 2,152 housing units, which is similar to Alternative 2. Under the Preferred Alternative, emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust and emissions related to building energy consumption and solid waste generation would be similar to Alternative 2. Increased growth potential within urban centers combined with improvements to transit service and connectivity provided by the

stations associated with the Preferred Alternative would result in potential for per capita VMT reduction similar to Alternative 5, resulting in similar reductions in criteria pollutant emissions.

What are some solutions or mitigation for impacts?

In addition to current and proposed policies, including transportation, and a new climate element with the One Seattle Comprehensive Plan Update, the following mitigation measures are considered in **Section 3.2 Air Quality & GHG Emissions**.

- VMT Related: Pedestrian facilities, bicycle improvements, transit improvements, congestion pricing, roadway fees, and tolls, land use mix and compactness.
- Electric vehicles
- Residential strategies including tree canopy, street sweeping, appropriate location of truck routes, and zoning standards addressing location, building, and site design.
- Incorporate standards for more frequent street sweeping to reduce roadway dust associated with increased VMT on high-travelled roadways within 1,000 feet of residential uses.
- Development standards that require or incentivize enhanced air filtering and circulation to address transportation-generated particulates for residences and other sensitive uses.
- Consider zoning standards that identify location, building, and site design provisions that support reduced exposure to potential air toxics.

The 130th/145th Station Area measures would be similar and tailored to the station area:

- Incorporation of development standards including requirements for enhanced air filtration and circulation for residential units within the Station Area and site intake vents as far from substantial sources as practicable.
- Building design strategies to minimize the number of residential units facing I-5.
- Planting of trees along streets with residential development and along commercial corridors including but not limited to the reforestation plan for the Lynnwood Link Extension.
- Restrict open spaces such as balconies near the source of toxic air contaminants (e.g., I-5).
- Restrict operable windows near sources of toxic air contaminants.

With mitigation, what is the ultimate outcome?

No significant unavoidable adverse impacts to air quality and greenhouse gas emissions are anticipated. Through mitigation implementation, local and state climate actions, and expected continued regulatory changes, the alternatives may result in lower GHG emissions on a per capita basis compared to existing conditions. The alternatives would not prevent or deter statewide, regional, or local efforts to reduce GHG emissions. While each 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.

Summary of Thresholds

Exhibit 1.6-4 summarizes potential impacts based on the evaluation in **Section 3.2 Air Quality & GHG Emissions**.

Exhibit 1.6-4. Air Quality & GHG Emissions Thresholds of Significance

Metric	Threshold	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref.
☒ Equity & Climate	Air Pollution: Growth focused in areas with high exposure to air pollution.[1]	▽	▼	▽	▽	▼	▼
☒ Equity & Climate	Per Capita GHG emissions: Increase in GHG emissions on a per capita basis.[2]	△	△	△	△	△	△
☒ Equity & Climate	Consistency with other efforts: Actions would prevent or deter statewide, regional, or local efforts to reduce GHG emissions.[3]	—	—	—	—	—	—

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative was added to this exhibit, and associated analysis in the notes, since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.

1 Air toxics and particulate matter risks and hazards are greatest near major highways and drop beyond approximately 656 feet from the center of highways. A buffer area of 500 to 1,000 feet has been considered to reduce the potential exposure of sensitive populations to air toxics. Under any alternative, increased residential densities could be expected within this buffer. Alternative 2 would place a greater number of units within the 1,000-foot buffer when compared to Alternative 1, 3, and 4, but fewer units compared to Alternative 5. Alternative 5 would place the greatest number of units within the 1,000-foot buffer when compared to the other alternatives. Growth under the Preferred Alternative within the Station Area would be similar to Alternative 2 and would potentially place a similar number of residents within close proximity to transportation-related pollutants along I-5 (less than Alternative 5).

2 According to the Seattle 2020 Community GHG Inventory, citywide core per capita emissions was 4.09 MTCO2e per resident in 2020. Alternative 1 would result in per capita emissions of 0.66 MTCO2e, which is significantly lower than the existing per capita rate. While Alternative 5 results in the highest overall housing growth (similar to the Preferred Alternative)~~and VMT~~, resulting in the second highest GHG emissions associated with transportation, building energy, and waste compared to the other alternatives, per capita emissions would be the lowest at 0.49. While the Preferred Alternative results in the same (and highest) overall housing growth as Alternative 5, the Preferred Alternative would result in greater transportation-related emissions due to the allocation and distribution of growth (resulting in higher VMT) and greater emissions associated with building energy and waste due to differing growth by housing types compared to Alternative 5. As such, per capita emissions under the Preferred Alternative would be slightly higher than Alternative 5 and lower than Alternatives 1 through 4. ~~Other action alternatives are in the range of Alternatives 1 and 5.~~

3 The alternatives would not prevent or deter statewide, regional, or local efforts to reduce GHG emissions. While each 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.

1.6.3 Plants & Animals

How did we analyze Plants & Animals?

Analyses in this EIS consider all plants and animals that may be affected by the alternatives, with particular emphasis on tree canopy cover and on streams that may receive stormwater runoff from pollution-generating impervious surfaces. This emphasis reflects heightened concern about those two elements of the environment. During the public scoping process, many stakeholders expressed concern about the loss of tree canopy cover in the city. With regard to stormwater, a growing field of research is finding that stormwater runoff contains contaminants that are harmful to fish, or terrestrial wildlife, including species that are listed as threatened or endangered under the Endangered Species Act (ESA).

Thresholds of significance utilized in this impact analysis include:

- Impacts that would reduce the likelihood ~~of survival or recovery of a plant or animal species in the wild~~ that populations of native plant or animal species would persist in or near Seattle, compared to the No Action alternative.
- A substantially increased potential for tree canopy cover loss, compared to the No Action Alternative.
- An appreciable increase in the delivery of stormwater contaminants to fish-bearing streams, compared to the No Action Alternative.

What impacts did we identify?

Reducing the amount of area dedicated to lower-density residential uses and increasing the amount of area available for conversion to higher-density uses would lead to an elevated risk of impacts to vegetation including loss of tree canopy ~~loss~~ on redeveloped parcels and in nearby road rights-of-way. In addition, for this Final EIS, analysts estimated the acreage of land that may be affected by residential development during the 20-year planning period. This analysis provides additional insights into the alternatives' potential impacts on vegetation.

What is different between the Alternatives?

Citywide

Plant and Animal Species: 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. None of the alternatives propose any modifications to those processes. The action alternatives would include policies to maintain and enhance tree canopy in rights of way and city property and to expand tree canopy throughout the community, prioritizing residential and mixed-use areas currently with the least ~~current~~ tree canopy. Implementation of these policies

could lead to beneficial effects for some species. 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 in and near Seattle. Based on these considerations, none of the alternatives would be expected to result in impacts that would reduce the likelihood that populations of native plant or animal species would persist in or near Seattle~~of survival or recovery of a plant or animal species in the wild~~.

Runoff and Streams: Development or redevelopment projects may create or replace impervious surfaces, including some pollution-generating impervious surfaces. If runoff from these surfaces enters fish-bearing streams, contaminants in the runoff may harm or kill fish. Contaminants in runoff that enter surface waters may also be harmful to terrestrial wildlife. On-site stormwater management would likely be required for development or redevelopment projects within the city limits. Implementation of required stormwater management would occur under any of the alternatives and would prevent or minimize the delivery of contaminants to fish-bearing streams. This, in turn, would avoid or minimize the potential for adverse impacts on ~~aquatic species~~ fish, wildlife, and their habitats.

The locations, design, and performance standards of stormwater facility improvements would be determined on a project-by-project basis and cannot be predicted for a programmatic review such as this. For this analysis, it is assumed that the potential for stormwater contaminants to be delivered to streams would be proportional to the amount of area available for conversion to higher-density uses. This assumption is based on the reasoning that a greater amount of area available for redevelopment projects would translate into a greater potential that there may be some projects for which it is not possible to avoid adverse impacts on water quality altogether.



Source: City of Seattle, 2023.

Tree Canopy: As described in **Section 3.3.1**, between 2016 and 2021, tree canopy cover decreased in all management units except Downtown, where it remained essentially unchanged The greatest acreage of canopy loss—more than three-quarters of the total loss—occurred in the Parks and Natural Areas and Neighborhood Residential management units. 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.

The potential for reductions in tree canopy cover would ~~be affected by~~ depend on the amount of area available for conversion to higher-density uses and the amount of area redeveloped for housing. 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. It may take many years for the planted trees to gain sufficient canopy area and volume to replace the functions of the trees they replace. This loss would be offset over time by the growth and development of trees that have already been planted to replace trees removed for past development projects. Requirements for tree planting in road rights-of-way may create opportunities for additional tree canopy development in areas that currently lack street trees. Also, the action alternatives would include policies to maintain and enhance tree canopy.

Based on the amount of area available for conversion to higher-density uses, as well as the estimated acreage of land that may be affected by residential development projects during the 20-year planning period, Alternative 1, No Action would have the lowest potential for development-related reductions in tree canopy cover. Among the action alternatives, Alternative 2 would have the lowest potential for reductions in tree canopy cover; this alternative focuses growth in neighborhood centers. Alternative 4 would have a moderate potential for reducing tree canopy cover. Alternative 3 would have a higher potential ~~for reduction in tree canopy cover~~ as it would be expected to allow for residential development at higher densities in the Neighborhood Residential zones. Based on the expectation that tree canopy cover in such areas is greater than in areas where high-density development is already present, Alternative 3 may have a higher potential for vegetation impacts—including loss of tree canopy—compared to the other action alternatives.

Compared to Alternative 3 and the Preferred Alternative, Alternative 5 would direct less housing growth to areas currently dominated by low-density residential development. As a result, Alternative 5 may have a lower potential for vegetation impacts—including loss of tree canopy—compared to those two alternatives. Based on this criterion, the Preferred Alternative may have a lower potential for vegetation impacts than Alternative 3 but a higher potential than the other action alternatives. ~~Given the highest number of homes produced and the broadest range of areas affected, Alternative 5 would tend to have the highest potential for loss of tree canopy.~~

See additional analysis of effects of alternatives on vegetation, including tree canopy, in **Section 3.3.2** and **Appendix G**.

Encouraging residential and commercial development within the urban environment of Seattle could indirectly benefit plants and animals by easing development pressure in less-developed areas outside the city.

Equity & Climate Vulnerability Considerations

Areas with disadvantaged populations tend to have less canopy cover than other areas. Generally, these areas also lost more canopy cover during the 5-year study period of the City's tree canopy assessment. Alternatives that concentrate growth in areas where extensive multifamily development is already present may have a higher likelihood of contributing to canopy cover loss in areas with disadvantaged populations. The risk of adverse impacts on disadvantaged populations would be partially offset by several factors, such as increased availability of lower-cost housing options in areas with higher canopy cover and access to large parks.

Trees play a vital role in moderating temperatures in urban areas. In general, areas with more canopy cover have cooler temperatures, compared to areas with less canopy cover. Increasing canopy in low-canopy neighborhoods is a critical aspect of the City's long-term heat preparedness strategy (Seattle Office of Sustainability & Environment 2022). 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 impacts.

Compared to the action alternatives, Alternative 1 would result in less growth in the city overall but would tend to focus that growth in areas where extensive multifamily development is already present. As a result, Alternative 1 would have a moderate risk of contributing to adverse effects on disadvantaged populations or exacerbating climate vulnerability compared to the action alternatives. Among the action alternatives, Alternative 3 would have the lowest likelihood of contributing to such effects; this alternative would minimize the amount of growth in areas where extensive multifamily development is already present. Alternative 2 would focus growth in a limited number of neighborhood centers, where extensive multifamily development is already present. As a result, the likelihood of contributing to adverse effects on disadvantaged populations or exacerbating climate vulnerability would be higher than under Alternative 3. Alternative 4 would likely have a level of impact for this topic that is between Alternatives 2 and 3.

Alternative 5 would include the most housing units overall spread across a wide range of areas including neighborhood centers, corridors, and neighborhood residential areas. Consequently, ~~the higher level of new homes~~ Alternative 5 ~~c~~would ~~result in~~ have a higher likelihood of contributing to canopy cover changes that adversely affect disadvantaged populations or exacerbate climate vulnerability, compared to ~~the other action a~~Alternatives 1 through 4. The Preferred Alternative, like Alternative 5, would add more new housing units than Alternatives 1 through 4, including in areas where extensive multifamily development is already present. However, similar to Alternative 3, a substantial portion of the area potentially affected by residential projects would be in the Neighborhood Residential place type, where existing levels of multifamily development are comparatively low. Based on a comparison of the estimated

amount of area affected by residential projects in areas where extensive multifamily development is already present, the Preferred Alternative would have a lower risk than Alternative 5 of contributing to adverse effects on disadvantaged populations or exacerbating climate vulnerability, and a higher risk than Alternatives 1 through 4.

130th/145th Station Area

Alternative 1: No areas with relatively high canopy cover are found in areas that would continue to be designated as urban centers or urban villages in the 130th/145th Station Area under Alternative 1. No areas currently zoned primarily for single-family residential uses in the 130th/145th Station Area would be converted to higher-density designations under Alternative 1. As such, Alternative 1 would have a lower potential of leading to increased delivery of stormwater contaminants to streams in this area, compared to the other alternatives.

Alternative 2: All three of the neighborhood centers that would be established in the 130th/145th Station Area under Alternative 2 would partially overlap areas with moderately high canopy cover. Approximately 117 acres in the 130th/145th Station Area (52 acres in the NE 130th Street unit and the full 65-acre area of the NE 145th Street unit) would be designated as neighborhood centers. Areas that are currently zoned primarily for single-family residential uses and that would be converted to higher-density designations under Alternative 2 make up approximately one-half of the 117-acre area that would be designated as neighborhood centers. As such, Alternative 2 would have a higher potential than Alternative 1 of leading to increased delivery of stormwater contaminants to streams in this Area 1, but a lower potential than the other action alternatives.

Alternative 5: Alternative 5 would convert approximately 200 acres of parcels that are currently zoned primarily for single-family residential uses to higher-density designations. These areas would partially overlap areas with moderately high canopy cover. However, the housing target for these areas would be higher than under any of the other alternatives. As a result, more redevelopment projects would be expected to occur in these areas under Alternative 5 than under the other alternatives, and Alternative 5 would thus have a higher potential of leading to increased delivery of stormwater contaminants to streams in this area, compared to the other alternatives.

Preferred Alternative: Similar to Alternative 5, the Preferred Alternative would convert approximately 200 acres of parcels that are currently zoned primarily for Neighborhood Residential (formerly single-family residential) uses to higher-density designations. However, compared to Alternative 5, fewer new housing units would be added in this area. As a result, the Preferred Alternative's potential for contributing to tree loss in areas with relatively high proportions of existing canopy cover in the 130th/145th Station Area may be less than that of Alternative 5. The Preferred Alternative's potential for leading to increased delivery of stormwater contaminants to streams in that area would be similar to that of Alternative 5.

What are some solutions or mitigation for impacts?

The City has long-standing and new regulations intended to address stormwater quality and tree canopy retention. Measures that may increase and enhance tree canopy cover include the following:

- Implement a Green Factor requirement in Urban Neighborhood Residential zones. The Green Factor is a menu of landscaping strategies that is intended to increase the amount and quality of urban landscaping while allowing increased flexibility for developers and designers to efficiently use their properties.
- Add an open space requirement in urban neighborhood zones, encouraging space for trees. (As of ~~Spring~~ early 2025~~4~~, the City anticipates adopting new zoning standards in urban neighborhood zones, to allow for middle housing types that have footprints offering consolidated open space areas).
- Develop an adaptive management policy to collect, monitor, analyze, and learn from the results of code application and to assess the Tree Protection Code's effectiveness in achieving the goals of retaining or replanting trees and increasing canopy cover while allowing for more housing options.
- Encourage or require attached units rather than detached units, which could result in more plantable area by eliminating small corridors between buildings. This option may be feasible in areas that would be classified as neighborhood center, urban neighborhood, or corridor under the action alternatives.
- Increase funding or use of in-lieu fees for City-led tree planting and maintenance in parks and rights-of-way, particularly in areas identified as heat islands.
- Expand existing programs such as Trees for Neighborhoods, which provides trees and support for people who want to plant trees on their property or in the adjacent right-of-way.
- Develop a comprehensive plan for investment in the equitable distribution and resilience of the urban forest.
- Investigate technologies such as flexible pavement, soil cells, expanded tree pits, and appropriate soil types in City-owned rights-of-way.
- Pursue creative approaches for maximizing green infrastructure in appropriate locations in City-owned rights-of-way—for example, installing planted bike lane and curb line buffer strips between curbs and sidewalks, or replacing parking spots and curb bulbs to support park-scale street trees.
- Collaborate with Seattle Public Schools and organizations such as Green Schoolyards America to increase tree cover on school grounds.

Possible additional measures for reducing the risk of delivering contaminants to fish-bearing streams include the following:

- Retrofit existing stormwater facilities to increase storage capacity and improve water quality treatment.

- Adopt stormwater detention standards that require new parcel development to detain larger volumes of stormwater runoff on-site and in a manner that mimics predeveloped stormwater patterns.
- Set lower development size thresholds to require more parcel projects to install on-site stormwater management.
- Set lower limits for the maximum percentage of a new development that could be covered with impervious surfaces.
- Encourage expanded use of soil amendments to facilitate stormwater infiltration (i.e., low-impact development practices) where technically feasible.
- Sponsor or encourage public education about the threats posed to fish by contaminants in stormwater runoff.
- Provide a stronger program for maintaining stormwater treatment and detention facilities.

With mitigation, what is the ultimate outcome?

Under any of the alternatives, population growth in Seattle will drive development and redevelopment of residential and commercial properties. 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 in or near Seattle. Based on this consideration, combined with the existing statutory and regulatory requirements that provide protection for plants and animals, none of the alternatives would be expected to result in impacts that would reduce the likelihood that populations of native plant or animal species would persist in or near Seattle~~of survival or recovery of a plant or animal species in the wild~~.

Similarly, none of the action alternatives would be expected to have significant, unavoidable adverse impacts on aquatic species and habitats. On-site stormwater management would likely be required for development or redevelopment projects within the city limits (see **Section 3.1.4**). Implementation of required stormwater management would occur under any of the alternatives. For these reasons, none of the action alternatives would be expected to result in an appreciable increase (compared to the No Action Alternative) in the delivery of stormwater contaminants to ~~fish-bearing streams~~surface waters. This, in turn, would avoid or minimize the potential for adverse impacts on fish, wildlife, and their habitats.

Also, none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover. As discussed in **Section 3.3.3**, the City's current tree protection regulations minimize the potential for development-related loss of tree canopy cover. For this reason, none of the action alternatives would result in a substantially higher potential for development-related tree canopy cover loss, compared to the No Action alternative. In addition, the potential for canopy loss due to other factors would be the same under all alternatives.

Encouraging residential and commercial development within the urban environment of Seattle could indirectly benefit tree canopy cover regionally by easing development pressure in less-developed areas outside the city. Increasing density in the city—particularly given the City's

requirements for tree protection and replacement—would have fewer adverse impacts than would the conversion of undeveloped parcels in suburban areas to low-density residential uses. In addition, development-related canopy loss under any of the alternatives would be expected to have a relatively minor influence on the total amount of tree canopy cover in the city.

Summary of Thresholds

Exhibit 1.6-5 summarizes potential impacts based on the evaluation in **Section 3.3 Plants & Animals**.

Exhibit 1.6-5. Plants & Animals Thresholds of Significance

Metric	Threshold	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref.
	Impacts that would reduce the likelihood that populations of native plant or animal species would persist in or near Seattle~~of survival or recovery of a plant or animal species in the wild~~, compared to the No Action alternative.[1]	Future baseline	—	—	—	—	—
☒ Equity & Climate	A substantially increased rate of tree canopy cover loss, compared to the No Action alternative.[2]	Future baseline	▽(-)	▽(+)	▽(-)	▽(+)	▽(+)
	An appreciable increase in the delivery of stormwater contaminants to fish-bearing streams, compared to the No Action alternative.[3]	Future baseline	—	—	—	—	—

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative was added to this exhibit, and associated analysis in the notes, since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.

1 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. Based on these considerations, none of the alternatives would be expected to result in impacts that would reduce the likelihood that populations of native plant or animal species would persist in or near Seattle ~~of survival or recovery of a plant or animal species in the wild~~.

2 Within the range of the action alternatives, Alternative 2 has less conversion potential (-) and the Preferred Alternative ~~3~~ the most (+), with Alternative 4 closer to Alternative 2 and Alternatives 3 and 5 closer to the Preferred Alternative ~~3~~.

3 On-site stormwater management would likely be required for development or redevelopment projects within the city limits. Implementation of required stormwater management would occur under any of the alternatives and would prevent or minimize the delivery of contaminants to ~~fish-bearing streams~~surface waters. This, in turn, would avoid or minimize the potential for adverse impacts on ~~aquatic species~~ fish, wildlife, and their habitats.

1.6.4 Energy & Natural Resources



Source: City of Seattle, 2023.

How did we analyze Energy & Natural Resources?

This section addresses impacts related to energy and other natural resources. Models employed for air quality and transportation provide data useful to calculate energy use from transportation sources and buildings. Thresholds of significance utilized in this impact analysis include:

- Energy usage in excess of projected supply availability.
- Conflict with energy policies adopted by the City of Seattle.

What impacts did we identify?

Construction Impacts: Future growth under any alternative would result in development of new residential, retail, light industrial, office, and commercial use. Fossil fuels for construction vehicles and other energy-consuming equipment would be used temporarily and would not represent a significant demand on energy resources. Selecting building materials composed of recycled materials requires substantially less energy to produce than non-recycled materials and could be promoted to reduce construction energy impacts.

What is different between the Alternatives?

Citywide

Transportation Energy: The EIS authors projected total vehicle miles traveled (VMT) by passenger vehicles, trucks, and buses to estimate annual transportation energy usage. **Exhibit 1.6-6** identifies total VMT by alternative. Alternative 1 produces the least total VMT and the Preferred Alternative ~~5~~ the most total VMT but all alternatives—including the No Action Alternative—will result in an increase in VMT over the existing condition. Although 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. As a result, estimated demand for all fuel types under the Preferred Alternative would be slightly higher than Alternative 5 and the greatest of all alternatives. Implementation of the One Seattle Comprehensive Plan, under all alternatives, would result in increased housing options and densities that, together with additional transit options such as the 130th and 145th Light Rail Stations, would reduce per-capita VMT compared to existing conditions.

Exhibit 1.6-6. Annual Vehicle Miles Traveled

	Existing	Alt. 1	Alt. 2	Alt. 3	Alt. 4*	Alt. 5	Pref. Alt.
Total VMT**	22,272,230	24,434,250	24,776,040	24,670,240	24,776,040	25,199,240	25,293,940
Total VMT excluding buses	22,203,300	24,357,100	24,698,900	24,593,100	24,698,900	25,122,100	25,216,800
VMT per capita cars and trucks	17.2	13.7	13.5	13.5	13.5	13.4	13.2

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
*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.
Includes cars, trucks, and buses. VMT in **Section 1.6.10 and **Section 3.10 Transportation** excludes buses.
Source: Fehr & Peers, 2024~~3~~.

See **Exhibit 1.6-7** for a comparison of annual fuel usage for studied alternatives in units of trillion British Thermal Units (Btu). All alternatives would use more gas, diesel, and compressed natural gas (CNG). Alternatives 3 and 5 and the Preferred Alternative would use more ethanol.

Exhibit 1.6-7. Annual Transportation Fuel Usage (Trillion Btu)

	Existing	Alt. 1	Alt. 2	Alt. 3	Alt. 4*	Alt. 5	Pref. Alt.**
Gasoline	0.347081	0.338094	0.347765	0.347735	0.347735	0.359576	0.36092
Diesel	0.01415	0.02023	0.02067	0.02069	0.02069	0.02122	0.02130
CNG	0.00012	0.000162	0.000162	0.000162	0.000162	0.000162	0.00016
Ethanol	0.00062	0.00063	0.00065	0.00065	0.00065	0.000677	0.00067

Note: The Preferred Alternative was added to this exhibit, and associated analysis in the notes, since the Draft EIS—edits made to Alternatives 1–5 are shown in tracks.
* 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.
** 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 fuel usage estimates have been estimated by increasing Alternative 5 fuel usage by 0.38%.
Source: Kimley-Horn, 20243.

Building Energy Demand: Increases in development would increase population and employment in the City of Seattle and would increase energy consumption. All future development would be required to adhere to energy efficiency standards combined with increased efficiency through performance requirements of the Seattle and Washington Energy Codes fostered by the Climate Action Plan and all-electric space and water heating required by the 2022 Washington Energy Code. Development within the City of Seattle under all alternatives will primarily be comprised of commercial, industrial, and residential. All new development or redevelopment would be designed and constructed to meet the applicable state and City building and energy conservative code requirements which would reduce energy consumption as compared to prior structures which likely used more energy consumption on a pro rata basis. A mixture of newer and older development would likely be more energy efficient than existing development, based on changes to building codes, innovations in building and technologies, and compliance with City energy conservation measures such as regular building tune-ups (in effect until December 31, 2028).

Using federal annual end-use consumption data for various housing types in the western US, the EIS team estimated electricity and natural gas usage under each alternative from new building square footage due to target growth; see **Exhibit 1.6-8**. Residential dwellings vary by alternative–80,000 dwelling units for Alternative 1, 100,000 dwelling units for Alternatives 2 through 4, and 120,000 dwelling units for Alternative 5 and the Preferred Alternative—but employment is similar in all alternatives, thus the difference is in household demand. Alternative 5 and the Preferred Alternative with the greatest dwelling units would have the most demand for electricity and natural gas, with slightly higher overall demand under the Preferred Alternative than Alternative 5, and Alternative 1 the least. Non-residential consumption has been estimated based on 2020 data on building energy benchmarking for industrial and commercial uses from Seattle City Light. Compared to existing energy per capita energy usage of 0.0002 trillion Btu

electricity and 0.00004 trillion Btu natural gas per capita in the State, per capita energy demand of all alternatives would be lower.

Exhibit 1.6-8. Building Energy Demand, New Building Square Footage Growth—Electricity and Natural Gas (trillion Btu)

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref. Alt.
Electricity						
Residential	1.29	1.58	1.64	1.61	1.91	2.08
Commercial	1.56	1.56	1.56	1.56	1.56	1.56
Industrial	0.37	0.37	0.37	0.37	0.37	0.37
Total Demand	3.22	3.51	3.58	3.54	3.84	4.01
Percent of Statewide Consumption	1.04~~0.18~~%	~~0.20~~1.13%	~~0.20~~1.15%	~~0.20~~1.14%	~~0.22~~1.24%	1.29%
Per Capita Electricity Demand*	0.000020	0.000017	0.000017	0.000017	0.000016	0.000016
Natural Gas						
Residential	0.17	0.21	0.21	0.21	0.25	0.26
Commercial	0.55	0.55	0.55	0.55	0.55	0.55
Industrial	0.18	0.18	0.18	0.18	0.18	0.18
Total Demand	0.90	0.94	0.95	0.94	0.98	1.00
Percent of Statewide Consumption	0.26~~7~~%	0.27~~8~~%	0.27~~8~~%	0.27~~8~~%	0.28~~9~~%	0.28%
Per Capita Natural Gas Demand*	0.0000055	0.0000046	0.0000046	0.0000046	0.0000040	0.0000041

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—edits made to Alternatives 1–5 are shown in tracks.
* Per capita demand based on projected population increase.
Source: Kimley-Horn, 2024~~3~~.

Equity & Climate Vulnerability Considerations

Extreme heat events will create increased energy demand for cooling while decreasing capacity and efficiency of energy systems as transmission lines and substations are stressed. Energy demand from buildings is lowest under Alternative 1 and greatest under the Preferred Alternative followed by Alternative 5 as noted above. Among Alternatives 2 through 4 with the same growth of 100,000 new dwellings but different patterns and types of housing, Alternatives 2 and 4 have lower building energy demand with more compact housing types in neighborhood centers and corridors compared to Alternative 3 with more distributed housing in urban neighborhoods. As new buildings are constructed, measures to promote building and site design that promote passive cooling may be appropriate. All alternatives have this potential to address cooling needs.

130th/145th Station Area

Alternative 1: Under Alternative 1, zoning designations would be retained within the 130th/145th Station Area and no new areas will be designated for mixed-use or higher density than exists under existing conditions. The future light rail station at 130th would be developed in an area that would allow three-story single-purpose residential development and four- to eight-story multifamily in the land surrounding the future 145th BRT Station. Impacts on supply availability related to existing conditions would be nominal:

- Alternative 1 assumes a growth potential of 840 housing units and 716 jobs, requiring approximately 0.02 trillion Btu of electricity and 0.005 trillion Btu of natural gas per year. This constitutes approximately 0.008~~1~~% and 0.001% of statewide electricity and natural gas usage, respectively.

Alternative 2: Under Alternative 2, changes in land use designations focus on addressing transit-oriented developments, designating the station areas as neighborhood centers. Growth would be clustered in small mixed-use nodes near transit, resulting in denser and taller buildings with heights of up to 80 feet. Impacts on supply availability in comparison with existing conditions would be nominal:

- Implementation of Alternative 2 assumes a growth potential of 2,208 housing units and 979 jobs, requiring approximately 0.05 trillion Btu of electricity and 0.009 trillion Btu per year of natural gas. This constitutes approximately 0.016~~03~~% and 0.003% of statewide electricity and natural gas usage, respectively, which are more than double the requirements of Alternative 1.

Alternative 5: Under Alternative 5, an urban centers designation on both the west and east sides of the 130th Station Area would merge with an existing commercial node to expand residential mixed use near the station. Growth would be accommodated in more mixed-use buildings, providing greater housing types in buildings with heights of up to 95 feet. Energy requirements under this alternative would be slightly higher than Alternative 2 and impacts on supply availability in comparison with Alternative 2 would be nominal.

- Implementation of Alternative 5 assumes a growth potential of 2,703 housing units and 1,004 jobs, requiring approximately 0.05 trillion Btu of electricity and 0.01 trillion Btu of natural gas per year. This constitutes approximately 0.017~~03~~% and 0.003% of statewide electricity and natural gas usage, respectively.

Preferred Alternative: Under the Preferred Alternative, similar to Alternative 5, an urban center designation on both the west and east sides of the 130th Station Area would merge with an existing commercial node to expand residential mixed use near the station. Growth would be accommodated in more mixed-use buildings, providing greater housing types in buildings with heights of up to 85 feet. The Station Area's share of the Preferred Alternative housing growth target is approximately 1.8%.

- Implementation of the Preferred Alternative assumes a growth potential of 2,152 housing units and 658 jobs, requiring approximately 0.05 trillion Btu of electricity and 0.008 trillion Btu of natural gas per year. This constitutes approximately 0.016% and 0.002% of

statewide electricity and natural gas usage, respectively. Energy requirements under this alternative would be slightly lower than Alternative 2 and impacts on supply availability in comparison with Alternative 2 would be similar.

What are some solutions or mitigation for impacts?

In addition to the One Seattle Plan policy updates and regulations and commitments, the following mitigation efforts would reduce the use of power in building heating and cooling:

- Installation of solar (photovoltaic) and other local generating technologies.
- Implementation of sustainable requirements including the construction and operation of LEED-compliant (or similar ranking system) buildings.
- The use of passive systems and modern power saving units.
- Use of alternative forms of energy could be included in larger developments where installation is cost effective.
- Implementation of conservation efforts and renewable energy sources to conserve electricity in new developments, including energy efficient equipment (i.e., light bulbs, appliances, and heating and air conditioning), and could reduce energy consumption.

With mitigation, what is the ultimate outcome?

No significant unavoidable adverse impacts on energy are anticipated. The development capacities proposed under all alternatives would increase overall energy consumption. This is mitigated by applying energy codes to new development and VMT measures for building and transportation energy usage. Adherence to energy efficiency measures would ensure that future development would not result in consumption of energy resources in excess of projected supply availability.

Average annual transportation fuel consumption would increase under all alternatives when compared to existing conditions by less than one percent due to the increase in total VMT associated with projected growth. However, with increased average vehicle fuel efficiency and providing the infrastructure and opportunity for people living and working in the City of Seattle to access alternative transportation modes, action alternatives would not result in the consumption of energy resources in excess of projected supply and would not conflict with energy policies adopted by the City of Seattle.

Since average annual energy use per capita is expected to decrease, the action alternatives would not conflict with energy policies adopted by the City of Seattle.

Summary of Thresholds

Exhibit 1.6-9 summarizes potential impacts based on the evaluation in **Section 3.4 Energy & Natural Resources**.

Exhibit 1.6-9. Energy Thresholds of Significance

Metric	Threshold	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref.
	Energy usage in excess of projected supply availability.[1]	—	—	—	—	—	—
	Conflict with energy policies adopted by the City of Seattle[2]	—	—	—	—	—	—

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative, and associated analysis in the notes, was added to this exhibit since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.

1 The development capacities proposed under all alternatives would increase overall energy consumption. Adherence to energy efficiency measures would ensure that future development would not result in the consumption of energy resources in excess of projected supply availability. Average annual transportation fuel consumption would increase under all alternatives when compared to existing conditions by less than one percent due to the increase in total VMT associated with projected growth. Providing the infrastructure and opportunity for people living and working in the City of Seattle to access alternative transportation modes, action alternatives would not result in the consumption of energy resources in excess of projected supply.

2 Improvements in fuel efficiency combined with reductions in VMT would contribute to reductions in transportation fuel demand on a per capita basis. Compared to existing energy per capita energy usage in the State, per capita energy demand of all alternatives would be lower. Since average annual energy use per capita is expected to decrease, the action alternatives would not conflict with energy policies adopted by the City of Seattle.

1.6.5 Noise

How did we analyze Noise?

The EIS evaluates noise/vibration impacts associated with implementing the alternatives considered in this EIS. The evaluation considers available reports, regulatory requirements, and guidance from federal, state, port, and city sources. The EIS noise expert reviewed technical data from noise monitoring locations and employed a Federal Highway Administration (FHWA) traffic noise model. Thresholds of significance utilized in this impact analysis include:

- The alternative would cause future traffic noise levels of 10 dBA or more above existing noise levels.
- Noise-sensitive receivers are concentrated near noise-generating (non-residential) activities or major roadways.

What impacts did we identify?

Construction Noise: Resulting construction activities associated with development of new residences, commercial and retail land uses, and mixed-use developments would have the potential to temporarily affect nearby sensitive receivers such as existing residences, schools, and nursing homes. Construction activities with the highest potential for construction-related noise or vibration impacts are those that require pile driving or other similar invasive foundation work. These types of construction activities are generally associated with high-rise development which all alternatives envision to occur within urban centers. The Seattle noise ordinance restricts the use of impact equipment to certain times of day and noise levels. The City of Seattle does not enforce quantitative vibration standards.

Transportation Noise Contribution by Alternatives: Traffic noise levels for all alternatives would increase by less than 1.5 dBA along all roadway segments modeled roadways. Outside of the laboratory, a 3-dBA change is considered a just-perceivable difference, and a 5-dBA change is clearly perceptible and is typically considered substantial. Consequently, an increase of less than 1.5 dBA would be considered a minor impact on environmental noise.

What is different between the Alternatives?

Citywide

Operational Noise Sources: If an active industrial development is proposed adjacent to noise-sensitive land uses, noise compatibility problems could arise. Noise levels from stationary sources would be required to comply with the exterior sound level limits outlined in the City's Noise Ordinance (SMC Chapter 25.08). Following compliance with the City's Noise Ordinance, stationary noise source impacts from all alternatives would not be significant.

Equity & Climate Vulnerability Considerations

Exterior noise levels in Seattle close to highways, freeways, and high traffic roadways can exceed 65 dBA L_{dn}. The 65 dBA L_{dn} noise level is important because it represents the exterior noise level which can be reduced to 45 dBA L_{dn} using standard construction techniques. The U.S. Department of Housing and Urban Development (HUD) utilizes a screening distance of 1,000 feet of highways or major roadways, 3,000 feet for railroads, and 15 miles for FAA-regulated airfields to evaluate transportation noise effects at sensitive receivers. EIS analysis indicates that existing uses along Interstate 5 (I-5) north of Interstate 90 (I-90) consist primarily of residential uses, within 1,000 feet of transportation noise sources.

Most alternatives seek to locate residential uses near transit or highly traveled roadways to reduce vehicle miles traveled within the city. New sensitive receptors (e.g., residential uses) could be located within noise contours up to 65 dBA L_{dn} (or greater) due to proximity to roadway, rail, and airport noise sources. Alternative 1 would have the lowest growth and Alternative 5 and the

Preferred Alternative the most. Alternative 4 would put more density in corridors, some of which is found in the 1,000-foot buffer, and more impact is anticipated under Alternative 4 than Alternative 2. The growth strategy of Alternative 5 and the Preferred Alternative would result in a ~~the~~ densest~~est~~er concentration of sensitive uses near major highways/roadways, transit facilities, and industrial/maritime uses compared to Alternatives 1 through 4, with the greatest concentration of sensitive uses near major noise sources under the Preferred Alternative.

Alternative 1 would locate several urban centers and urban villages within 1,000-feet of roadways with greater than 100,000 daily vehicles. Alternatives 1, 3, and 4 would have less population in proximity to the 1,000 feet of the major roadways than Alternatives 2 and 5 and the Preferred Alternative based on the areas of focus for growth associated with the Alternatives. Alternative 2 would place a greater number of units within the 1,000-foot buffer when compared to Alternative 1, 3, and 4, but fewer units compared to Alternative 5 and the Preferred Alternative. Alternative 5 and the Preferred Alternative would place a ~~the~~ greater~~st~~ number of units within the 1,000-foot buffer when compared to ~~the other~~ Alternatives 1 through 4, with the greatest number of units within the 1,000-foot buffer under the Preferred Alternative.

130th/145th Station Area

Alternative 1: Under Alternative 1, the 130th/145th Station area would experience minimal traffic noise increases and stationary source noise levels (e.g., HVAC systems, parking noise, conversations, and other noise sources typical of urban areas) but highway traffic noise sources would continue to dominate the existing noise environment.

Alternative 2: Under Alternative 2, the 130th/145th Station Area would be designated as neighborhood center and would include a mix of low-rise residential, midrise residential, and neighborhood commercial uses. Some traffic noise and stationary source noise levels could increase though not above background highway traffic noise. Alternative 2 would site residents and commercial/retail uses near transit hubs, which would likely reduce traffic and traffic noise levels associated with increased development in the area.

Alternative 5 and the Preferred Alternative: Noise impacts at the Station Area would be most substantial under Alternative 5 and the Preferred Alternative, which includes the strategies for encouraging housing growth in Alternatives 2, 3, and 4 plus some additional changes to existing regional center and urban center boundaries and changes to place type designations. Under this alternative, an urban center would be created on both the west and east sides of I-5 at the Sound Transit light rail station. As a result, the 130th/145th Station Area would experience higher traffic noise and stationary source noise at increases than Alternatives 1 through 4.

What are some solutions or mitigation for impacts?

Measures to Reduce Construction-Related Noise & Vibration Impacts

In addition to restrictions on the hours of construction in accordance with the Seattle Noise Ordinance, other mitigation that could be applied includes:

- Installing barriers to shield noise sensitive receptors and enclosing stationary work.
- Selecting haul routes to avoid noise sensitive areas.
- Using fully baffled compressors, or preferably electric compressors.
- Using fully mufflered construction equipment.
- Use low-noise emission equipment.
- Monitor and maintain equipment to meet noise limits.
- Prohibit aboveground jack hammering and impact pile driving during nighttime hours.

To reduce potential moderate adverse noise impacts from impact pile driving activities adjacent to noise-sensitive land uses (within 50 feet) or moderate adverse vibration impacts to historic structures, the One Seattle Comprehensive Plan could consider adoption of a policy recommending the Seattle Noise Ordinance be updated to require best practices for noise control, including "quiet" pile-driving technology and using temporary sound walls or cushion blocks.

Measures to Reduce Land Use Compatibility Noise Impacts

Although mitigation measures are not required due to a lack of significant adverse impact findings, to reduce the potential for exposure of residences and other noise-sensitive land uses to incompatible environmental noise, the One Seattle Plan could consider adoption of a policy that recommends that residences and other noise-sensitive land uses (i.e., schools, day care) be separated from freeways, railways, ports, and other active industrial facilities where exterior noise environments exceed 65 dBA L_{dn}. If sensitive land uses are proposed in such areas, a policy addressing the need for additional mitigation strategies could be considered to achieve an interior noise performance standard of 45 dBA L_{dn}. The types of implementation measures that could help to accomplish this include:

- Coordination with WSDOT on sound wall construction.
- Use of appropriate building materials such as walls and floors with a sound transmission class (STC) rating of 50 or greater.
- Site design measures, including use of window placement to minimize window exposure toward noise sources, avoid placing balcony areas in high noise areas, and use of buildings as noise barriers.
- Use of acoustically rated building materials (insulation and windows).

In addition, zoning land use criteria or boundaries could be established, while meeting other planning goals, to limit the proximity of new residential development to known or anticipated sources of high noise levels.

With mitigation, what is the ultimate outcome?

Under all studied alternatives, increased residential and employment growth could result in increased traffic volumes, though the resulting noise increases are not anticipated to exceed 3dBA, the threshold of change that is perceptible. The location of noise sensitive receivers (e.g., residential uses) near traffic, rail, or industrial noise sources could occur under all alternatives, particularly Alternatives 4 and 5 and the Preferred Alternative. Implementation of residential noise mitigation described in the previous subsection should adequately reduce noise experienced by noise-sensitive receivers. With the application of mitigation measures described above, no significant unavoidable adverse noise impacts would occur under any of the alternatives.

Summary of Thresholds

Exhibit 1.6-10 summarizes potential impacts based on the evaluation in **Section 3.5 Noise**.

Exhibit 1.6-10. Noise Thresholds of Significance

Metric	Threshold	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref.
	The alternative would cause future traffic noise levels of 10 dBA or more above existing noise levels.[1]	▽	▽	▽	▽	▽	▽
☒ Equity & Climate	Noise-sensitive receivers are concentrated near noise-generating (non-residential) activities or major roadways.[2]	▽	▽	▽	▼	▼	▼

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative, and associated analysis in the notes, was added to this exhibit since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.

1 Traffic noise levels for all Alternatives would increase by less than 1.5 dBA along all roadway segments modeled ~~roadways~~ less than the 10dBA or more above existing noise levels. Consequently, an increase of less than 1.5 dBA would be considered a minor impact on environmental noise. The Preferred Alternative would result in traffic noise increases ranging from 1.0 dBA L_{dn} to 2.4 dBA L_{dn} and would not result in a significant (10 dBA or more) dBA noise increase.

2 Alternative 4 would focus more growth near transit and major highways/roadways than Alternatives 1 through 3 considered a moderately adverse noise impact that can be reduced with mitigation measures. Alternative 4 would place the fewest number of units (the same as Alternatives 1 and 3) within the 1,000-foot buffer when compared to Alternative 2 and 5 and the Preferred Alternative. Alternative 5 would place a greater number of units within the 1,000-foot buffer when compared to Alternatives 1 through 4 and would place fewer units within the 1,000-foot buffer when compared to the Preferred Alternative. The growth strategy of ~~Alternative 5~~ the Preferred Alternative would result in the densest concentration of sensitive uses near major highways/roadways, transit facilities, and industrial/maritime uses, considered a moderately adverse noise impact but mitigation measures would reduce this noise impact.

1.6.6 Land Use & Urban Form

How did we analyze Land Use & Urban Form?

The EIS evaluates current land and shoreline uses, physical form, and views. It reviews land use patterns and compatibility, urban form (height, bulk scale, transitions, and tree canopy), shadows, and views as well as resulting equity and climate vulnerability considerations. Elements of the analysis include:

- **Land use patterns** consider the distribution of growth and intensity of planned uses as well as resulting activity levels.
- **Land use compatibility** considers changes in use type between adjacent areas and any likely incompatibilities. Land use incompatibilities could be related to health and safety (such as noise levels or odors), activity levels at various times of day/night, or conflicting movement patterns.
- **Height, bulk, and scale** considers the physical form, aesthetic, and character of development (such as massing, setbacks, height, and FAR).
- **Transitions** consider visual changes in physical form between adjacent areas.
- **Tree canopy** considers how urban form affects tree canopy.
- **Shadows** consider shading of public open space or rights-of-way as a result of allowed development and the possible implications related to health, urban heat, and the human experience.
- **Views** consider the protection of public views of important landmarks and natural features, as well as views from specific designated viewpoints within the city and scenic qualities along mapped scenic routes.

What impacts did we identify?

Citywide

The major topics are addressed below with impacts common to all alternatives.

- **Land Use Patterns:** Activity levels would increase across the city with new residents, businesses, and employees. The primary differences between the alternatives lie in the distribution and intensity of growth across the city and the projected land use patterns.
- **Land Use Compatibility:** Future growth under all alternatives is likely to increase the frequency of different land use types locating close to one another, and similarly likely to increase the frequency of land use patterns that contain mixes of land uses with differing levels of intensity, both within areas currently designated as urban centers and villages and, to a varying extent, in other areas of the city.

- **Height, Bulk, and Scale:** Future growth and development directed into existing urban centers and villages under all alternatives would result in a moderate amount of additional height and bulk in these commercial and mixed-use nodes.
- **Transitions:** Gradual redevelopment of new buildings that are larger than those they replace is likely to occur under all alternatives, especially in urban centers and villages. Redevelopment would create a potential for localized adverse compatibility issues as existing, lower-intensity uses transition to higher-intensity development forms. For example, areas that are predominately composed of detached single-family homes may experience more occurrences of sharper transitions in urban form as new, more intensive forms—such as townhomes and multi-family apartments—could be built alongside existing single-family homes. Redevelopment could also result in sharper transitions between zones and place types.
- **Trees:** Bulkier development under all alternatives would likely displace some trees on private property, especially in residential zones. This is a threshold that helps the City consider equity and climate implications.
- **Shadows:** Under any alternative, redevelopment will generally be taller and often bulkier than the existing building. Taller buildings cast longer shadows, and bulkier buildings cast wider shadows, especially downhill. Some development would likely occur adjacent to parks under all alternatives; an adjacent southern building is most impactful throughout the day. Height limits and street widths vary throughout Seattle, but in all cases, east-west-oriented streets are challenging for solar access, especially during wintertime. In most cases, the 3-story and taller buildings on the south side would shade the southern side of the street throughout the year except summertime and may shade both sides of the street throughout a winter day.
- **Views:** Under all alternatives, new buildings would develop with greater height and bulk and, with these increases, development may interfere with publicly protected views. Because these views are protected under current regulations, views would remain unobstructed as long as potential impacts are identified during permit review. Of note, the number of SEPA-protected viewpoints, scenic routes, and Seattle-designated historic landmarks means that view corridors impact development capacity on many sites.

Equity & Climate Vulnerability Considerations

Regarding equity and climate considerations, the Land Use & Urban Form section addresses the relationship of height and density to housing choice, creation of community building spaces, as well as active transportation, and other climate considerations including tree canopy cover and heat islands. Two of the topics are summarized below. See **Section 3.6** for more information.

Height and Density: Relationship to Housing Supply & Affordability

The present combinations of allowed height, FAR, and setbacks found in Seattle's zoning regulations generally led to denser housing with many studio and 1-bedroom units over the last 20 years. A broad, citywide approach to allowing increased density with taller buildings

would likely have more equitable impacts to housing choice, a more varied urban form, and more opportunity for vibrant neighborhoods.

- Alternatives 1 and 2 would largely continue current patterns.
- ~~Alternative 3:~~ Alternative 3 would allow middle housing types such as duplexes, triplexes, fourplexes, sixplexes, and stacked flats in all Neighborhood Residential zones, and would provide more options for people to stay in their community over a lifetime and across generations. Housing configurations that cluster more units together on a site provide more opportunities for intergenerational families to live near each other.
- Alternative 4 offers a wider range of housing types similar to Alternative 3 as well as 5-story buildings close to transit and parks. The likely increase in housing type variety would provide more housing for different life stages similar to Alternative 3. Increasing housing type options across half of Neighborhood Residential zones in the city also increases the opportunities for people to live in parts of the city economically closed off to them in Alternative 1.
- Alternative 5 and the Preferred Alternative combine~~s~~ the place types found in Alternatives 2–4 and therefore could provide the most housing type variety and choice ~~amongst all the alternatives~~.

Relationship to Street-level Community-building Spaces

A lively, vibrant neighborhood center is dependent on having a robust residential population nearby. The expected patterns of development, with increased height, bulk, and scale, could improve the ability to gather in public places and cultural anchors (i.e., culturally relevant businesses, services, religious institutions, arts, etc.), as long as commercial space displacement is mitigated and appropriate gathering spaces are provided.

- Alternative 1: Alternative 1 would continue a pattern of small areas of apartments with small, less expensive units surrounded by large areas with high-cost detached homes. This division could limit social wellbeing and sociability. At the same time, these higher densities close to transit and amenities increase opportunities for active living, which in turn increases chances for sociability and wellbeing.
- Alternative 2: Impacts under Alternative 2 would be similar to Alternative 1, but an increase in compact urban form of more housing and commercial uses could provide more spaces and locations where social interactions can happen than under Alternative 1.
- Alternative 3: Although possible future development of middle housing may lead to less open space on lots than under Alternative 1, more units would surround and share the available open space, which would increase opportunities for sociability amongst neighbors.
- Alternative 4: More housing within a 5-minute walk to large parks under Alternative 4 would likely increase opportunities for social interactions and social wellbeing. At the same time, the number of people living along inhospitable arterials, where social interactions can be inhibited by traffic's impact on sense of safety, air quality, and noise would likely increase.
- Alternative 5 and the Preferred Alternative: With ~~the~~ an increase in middle housing types and variety throughout the city and fewer concentrated extremes of higher and lower

density areas, Alternative 5 and the Preferred Alternative would likely have overall positive impacts on social wellbeing and social interactions, similar to Alternative 3. Similar to Alternative 4, there could be impacts with greater density along arterials, but ~~perhaps~~ to a lesser degree with development opportunities more dispersed ~~in~~ under Alternative 5 and the Preferred Alternative.

130th/145th Station Area

The 130th/145th Station Areas will likely redevelop under all alternatives, although the scale, location, and intensity of that development would vary by alternative. Some commonalities include:

- **Height/bulk/scale.** Large superblocks (longer than 600 feet) lacking a connected internal path or street network mean that direct routes to access the station will be challenging without regulations to encourage or require through-connections with redevelopment. Redevelopment at the light rail station would occur in a physically bifurcated, uncomfortable human environment (at 5th Ave NE, Roosevelt Way, and I-5) and could miss an opportunity to celebrate and activate the station entry.
- **Tree canopy.** Plentiful evergreens, steep slopes, Thornton Creek, and environmentally critical areas near the 130th Station Area make development here unique, and perhaps more constrained, than many other Seattle areas. Existing large evergreen trees make residential areas feel set in hillside woods. Tree preservation could impact development capacity, and redevelopment with a loss of existing trees would have a noticeable effect on the human experience and sense of being set in nature.
- **Shadows.** In general, the existing tall evergreens, combined with steep slopes, significantly shade many residential areas. Shadow impacts from increases in building heights would be less noticeable in these residential areas because of those existing shadows. The north-south orientation of 15th Ave NE, as well as to a lesser extent the diagonal orientation of Roosevelt Way NE, allows for greater solar access for longer hours throughout the year, even with increases in building heights.

What is different between the Alternatives?

Exhibit 1.6-11, **Exhibit 1.6-12**, and the following text summarize and compare land use impacts citywide and within the 130th/145th station areas under each alternative based on the evaluation in **Section 3.6 Land Use Patterns & Urban Form**. A summary of each topic and results is provided after each table.

Citywide

Exhibit 1.6-11. Summary of Land Use and Urban Form Impacts by Alternative—Citywide

Metric	Impact	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref.
	Land Use Patterns	▽	▼	▽	▼	▼	▼
	Land Use Compatibility	▽	▼	▼	▼	▽	▽
	Height, Bulk, & Scale	▽	▼	▼	▼	▼	▼
	Transitions	▼	▽	▲	△	▲	▲
☒ Equity & Climate	Tree Canopy (how urban form affects tree canopy)	▽	▽	▼	▼	▼	▼
	Shadows	▽	▼	▽	▽	▼	▼
	Views	—	—	—	▽	▽	▽

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative was added to this exhibit since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.
Sources: BERK, 2024~~3~~; MAKERS, 2024~~3~~.

Land use patterns. Growth under all alternatives would increase activity levels and land use intensities across the city resulting in likely adverse impacts to land use patterns. All alternatives focus most future growth into centers currently characterized by higher densities, more compact building forms, and a more diverse mix of uses than other areas of the city. Land use patterns in the neighborhood centers and corridors would intensify more under Alternatives 2 and 4, respectively, than under the No Action Alternative. Under Alternative 3, overall land use patterns would become denser over time within the urban neighborhood zones but most of this development would continue to be residential in nature and would be more spread throughout the analysis areas than the other action alternatives. Alternative 5 and the Preferred Alternative includes the most growth overall and incorporates elements of the other action alternatives—the intensity of land use patterns would shift most dramatically under Alternative 5 and the Preferred Alternative as activity levels increase over time.

Land use compatibility. Future growth under all alternatives is likely to increase the frequency of different land use types locating close to one another, and similarly likely to increase the frequency of land use patterns that contain mixes of land uses with differing levels of intensity, both within the centers and, to a varying extent, in other areas of the city. Land use incompatibilities under the No Action Alternative would be similar to those observed today but could become more severe over time with continuing trends. Under the action alternatives, denser and more mixed-use land use patterns in the new place types could result in localized land use compatibility impacts within the place types or on the border with adjacent residential areas. All neighborhood centers, for instance, already contain areas zoned for commercial or mixed-use development but additional jobs and commercial space could increase more quickly in these areas due to the local demand from new housing. However, adverse compatibility

impacts at the periphery of most existing centers would also be minimized as the new place types redevelop with denser development—this would be most noticeable over the long term under Alternative 5 and the Preferred Alternative as the abutting neighborhood center, corridors, and urban neighborhood areas redevelop. See also the summary of transitions below.

Height, bulk, and scale. Height, bulk, and scale impacts would likely occur under all alternatives as development occurs. Future growth and development directed into existing centers under all alternatives would result in a moderate amount of additional height and bulk in these commercial and mixed-use nodes generally consistent with that experienced during growth over the last 20 years. Under the action alternatives, building heights, bulk, and/or scale in the new place types would likely increase with new development. These impacts would be more pronounced in the neighborhood centers and corridors where height limits would be increased up to 5-7 stories. Where middle housing is allowed in new places, more properties may develop with 3-story (or 4-story if affordable) buildings adjacent to 1- and 2-story buildings. The alternatives vary in the likelihood of localized impacts (Alternatives 1, 2, and to some extent 4) versus more distributed impacts (Alternatives 3 and 5 and the Preferred Alternative).

Transitions. Continued infill development in established centers and villages under the No Action Alternative would likely create increasingly stark contrasts with surrounding lower-scale areas. The new place types introduced under the action alternatives would generally reduce existing contrasts between centers (that see widespread development of large buildings) and surrounding areas (with broad areas that see minimal development). Over time, edges under Alternatives 3 and 5 and the Preferred Alternative would be softened the most as feathered gradations of intensity fill in around nodes of activity, neighborhood amenities, and existing centers.

Tree canopy. Bulkier development under all alternatives would likely displace some trees on private property, especially in residential zones. At the same time, the number of street trees may increase where they are required with redevelopment. Private property may see a greater loss of existing tree canopy under the action alternatives with more widespread redevelopment. For example, the increase in size and number of buildings allowed on a lot in Alternatives 3 and 5 and the Preferred Alternative will likely decrease the amount of space available for trees on urban neighborhood lots.

Shadows. Under any alternative, taller and often bulkier redevelopment will cast longer and/or wider shadows than existing development. Building shadows can be considered positive for climate adaptation to reduce summertime heat but can be negative for human health and wellbeing (especially during winter) and the health of existing trees if accustomed to full sun. Over time, increased height limits in the neighborhood centers, corridors, and expanded urban centers under Alternatives 2, 4, and 5 and the Preferred Alternative would likely result in longer shadows over a greater portion of the day compared to the other alternatives and may be most impactful where shadows would fall downhill or on east-west oriented neighborhood main streets.

Views. Future development under Alternatives 1 through 3 would present limited disruptions to public views. Growth would continue to concentrate in centers (which tend to contain few

viewpoints), most public viewpoints are outside the neighborhood centers in Alternative 2, and there would be no height increase for market-rate development and a minimal height increase for affordable housing in the Neighborhood Residential zones under Alternative 3. Most of the protected viewpoints and scenic routes are within or adjacent to the more intense development expected in the corridor place type under Alternatives 4 and 5 and the Preferred Alternative, and a few are in or near the expanded regional and urban centers in Alternative 5 and the Preferred Alternative. Development under these alternatives may disrupt views in more places.

130th/145th Station Areas

Exhibit 1.6-12. Summary of Land Use and Urban Form Impacts by Alternative—130th/145th Station Areas

Metric	Impact	No Action	Alt. 2	Alt. 5	Pref.
	Land Use Patterns	—	▼	▼	▼
	Land Use Compatibility	▼	▼	▽	▽
	Height, Bulk, & Scale	▽	▼	▼	▼
	Transitions	▼	▽	▲	▲
☒ Equity & Climate	Tree Canopy (how urban form affects tree canopy)	▽	▽	▼	▼
	Shadows	▽	▼	▼	▼
	Views	—	—	▽	▽

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative was added to this exhibit since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.
Sources: BERK, 2024~~3~~; MAKERS, 2024~~3~~.

Land use patterns and compatibility. No adverse impacts to land use patterns are expected in the station areas under the No Action Alternative. No new areas would be designated for mixed-use or higher density and building types outside existing commercial zoning would remain primarily single purpose with some multi-family uses near the 145th BRT station. Few parcels around 130th would be likely to fully redevelop under the No Action Alternative, though more may see additions (e.g., ADUs) and rebuilds consistent with the existing land use patterns. However, the area may still see increased activity under the No Action Alternative over time as people seek to access the light rail station which could result in compatibility impacts with surrounding lower density residential development. Greater change would occur in the areas currently zoned for more intense development, including the 145th BRT station area and Pinehurst area.

Under Alternatives 2 and 5 and the Preferred Alternative, both station areas would likely redevelop into mixed-use nodes with more growth at greater heights clustered in the newly designated neighborhood centers (Alternatives 2 and 5 and the Preferred Alternative) and urban center (Alternative 5 and the Preferred Alternative). Activity levels and land use

intensities would increase resulting in greater impacts to land use patterns than the No Action Alternative. Compatibility impacts would be similar to those described citywide for neighborhood and urban centers.

Height, bulk, and scale. Changes to height, bulk, and scale would be limited under the No Action Alternative and primarily within the 145th station area. Under Alternatives 2 and 5 and the Preferred Alternative, the station areas could see extensive changes to height, bulk, and scale as a result of proposed zoning capacity increases combined with proximity to the new light rail station. Heights could reach up to 7-8 stories immediately adjacent to the 130th light rail station and in the core of the 145th station area. 15th Ave NE (both in the 145th station area and Pinehurst) as well as NE 125th St at 15th Ave NE and Roosevelt Way NE south of NE 125th St would likely see greater levels of activity, enlivening the street level experience. However, many small commercial spaces currently exist in strip malls or in adapted houses in these areas. Maintaining affordable commercial space in the area for local and BIPOC-owned businesses may be challenging with redevelopment, impacting the social and cultural ties to these neighborhood centers.

Under all alternatives, large superblocks (longer than 600 feet) lacking a connected internal path or street network also mean that direct routes to access the station will be challenging without regulations to encourage or require through connections with redevelopment. Redevelopment at the light rail station would occur in a physically bifurcated, uncomfortable human environment (at 5th Ave NE, Roosevelt Way, and I-5) and could miss an opportunity to celebrate and activate the station entry.

Transitions. Transitions impacts in the station areas would be similar to those described citywide for the No Action Alternative and Alternatives 2 and 5 and the Preferred Alternative. Under Alternatives 2 and 5 and the Preferred Alternative, development of high-intensity buildings in the immediate vicinity of the 130th station area may create abrupt local transitions in scale between existing detached houses and new larger construction. Over time, an evolution of the station area into more consistently intensely used land, combined with smaller scale redevelopment in surrounding low-rise zones, would likely soften these transitions.

Tree canopy. Plentiful evergreens, steep slopes, Thornton Creek, and environmentally critical areas near the 130th Station Area make development here unique, and perhaps more constrained, than many other Seattle areas. Existing large evergreen trees make residential areas feel set in hillside woods. Tree preservation could impact development capacity, and redevelopment with a loss of existing trees would have a noticeable effect on the human experience and sense of being set in nature. Under all alternatives, any redevelopment would fill gaps in street trees along the frontage. Large-scale redevelopment under Alternatives 2 and 5 and the Preferred Alternative in the station areas (more so under Alternative 5 and the Preferred Alternative) would significantly impact the existing tree canopy. Alternatively, if trees are protected "exceptional" trees, development capacity would be constrained.

Shadows. Under all alternatives, the existing tall evergreens, combined with steep slopes, significantly shade many residential areas. Shadow impacts from increases in building heights

would be less noticeable in these residential areas because of those existing shadows. The north-south orientation of 15th Ave NE, as well as to a lesser extent the diagonal orientation of Roosevelt Way NE, allows for greater solar access for longer hours throughout the year, even with increases in building heights. Under Alternatives 2 and 5 and the Preferred Alternative, increased height limits could result in increased shadows on Jackson Park. However, the human experience of the park would not significantly change as tall evergreens already shade the park boundaries.

Views. Impacts to views in the station areas under the No Action Alternative and Alternative 2 would present limited disruptions to public views. Increased height limits near the 130th light rail station under Alternatives 2 and 5 and the Preferred Alternative could have limited impacts on the adjacent I-5 scenic corridor.

What are some solutions or mitigation for impacts?

Citywide

All alternatives would focus the majority of future growth into the existing urban centers and villages. Compatibility challenges would not be an uncommon or new phenomenon in these areas and can be avoided or mitigated by continuing to implement the Land Use Code (Title 23). New place types and/or expanded housing options in existing Urban Neighborhood Residential zones proposed as part of the action alternatives would introduce localized land use and urban form impacts where newer development is of greater height and intensity than existing development. 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. Overall, the new place types would create smoother and more varied transitions in intensity throughout the city (especially adjacent to urban center and village boundaries).

Existing building and land use policies, programs, and codes that promote compact building forms and energy efficient, low-carbon, green building techniques—such as the City's green building permit incentives for private development and the Sustainable Buildings and Sites policy for City-development—would continue to apply under all alternatives.

Under the action alternatives, the City could also update Comprehensive Plan policies to further address the effects of climate change, particularly for communities more vulnerable to the effects of climate stress than others or located in areas in the city that may experience larger effects from climate change (including "heat islands" with more pavement and fewer trees, floodplain and landslide hazard areas, and areas with limited access to transit). For example, the action alternatives focus additional residential growth in areas 1, 2, and 6 which have relatively high levels of existing tree canopy cover. Required frontage improvements could increase the number of street trees with redevelopment, though more and bulkier development under all alternatives would likely displace some trees on private property and reduce tree canopy coverage overall.

130th/145th Station Area

- **Urban design and active transportation: Transit celebration**. Incentivize or require development to relate to, enhance, celebrate, and activate the station entry with transit-oriented commercial and public space.
- **Urban design and active transportation: Intersite connectivity.** Incentivize or require new development to provide new paths or streets to break down large blocks and provide direct, short routes to the station.
- **Street-level community building: Lack of focused public realm.** Undertake a community design effort to develop a cohesive approach toward development of public streets, public realm, or opportunities for shared social gathering that could be implemented through a combination of private development and public projects.
- **Street-level community building: Affordable commercial space.** Implement the 130th & 145th Station Area Planning Plan displacement mitigation strategies.
- **Child-friendly city and social wellbeing: Shared open space.** Incentivize or require outdoor gathering spaces, especially children's play areas, which are oriented away from air and noise pollutants. Consider allowing zero-lot line development to allow for incremental development of interlocking buildings that create an active and varied street front—that can also block air and noise—while consolidating privately shared gathering space internally.
- **Sociability: Small social spaces.** Incentivize or require social corridors and/or shared entries amongst a small group of units in residential development to promote trust-building and social connections. Consider allowing more than 2 single-stair buildings per lot to maximize opportunities for shared entries amongst smaller groups of neighbors.

With mitigation, what is the ultimate outcome?

Over time, additional growth and development will occur in Seattle and a generalized increase in development intensity, height, bulk, and scale is expected under all alternatives—this gradual conversion of lower-intensity uses to higher intensity development patterns is unavoidable but an expected characteristic of urban population and employment growth. No significant unavoidable adverse impacts to land use patterns, compatibility, or urban form are expected under any alternative.

Future growth is likely to result in temporary or localized land use impacts as development occurs. The potential impacts related to these changes may differ in intensity and location in each of the alternatives and many are expected to resolve over time. Application of the City's adopted or new development regulations, zoning requirements, and design guidelines are anticipated to sufficiently mitigate these impacts.

Summary of Thresholds

The results of the Land Use and Urban Form evaluation and SEPA thresholds of significance are addressed in **Exhibit 1.6-11** and **Exhibit 1.6-12**.

1.6.7 Plans & Policies

How did we analyze Plans & Policies?

The EIS reviews adopted state, regional, and City plans and policies that guide growth in Seattle and reviews the proposed alternatives for consistency with the adopted plans and policies—an impact is identified if the proposal would result in an inconsistency with adopted plans and policies.

What impacts did we identify?

Growth Management Act—Goals: All alternatives have sufficient zoned vacant and redevelopable land to accommodate the minimum 20-year population, housing, and job allocations. The action alternatives would each adopt a new growth strategy and each element of the Comprehensive Plan would be updated. The plan would continue to focus growth in an urban area with a range of public services and multimodal transportation options, provide for parks and recreation, and protect critical areas and historic resources consistent with the GMA.

Countywide Planning Policies—Growth Targets: Each studied alternative would provide capacity to meet minimum growth targets for housing and jobs.

What is different between the Alternatives?

Citywide

VISION 2050—Regional Growth Strategy, Development Pattern Policies: The action alternatives would update the Comprehensive Plan to meet VISION 2050 policies. The No Action Alternative would not update the Comprehensive Plan policies, though the growth capacity would still meet minimum growth targets expected of a Metropolitan city. The action alternatives provide for more growth and add capacity to meet additional policies and objectives in VISION 2050 including improved balance of jobs and housing, creating opportunities for middle housing, focusing more growth around transit investments, and contributing to a pattern of growth that supports regional climate goals.

Growth in Seattle that is more balanced between housing and jobs could be beneficial for overall growth patterns in the region and reduce development pressures in other non-urban areas.

VISION 2050 Climate Policies: Under VISION 2050 there are 12 metropolitan planning policies meant to help reduce greenhouse gas emissions and prepare for climate change impacts. All studied alternatives would increase greenhouse gas emissions associated with buildings and waste. The growth levels of Alternatives 2 through 4 would reduce transportation emissions and Alternative 5 and the Preferred Alternative would slightly increase transportation emissions. The region-wide benefit of channeling development that might otherwise occur in peripheral areas of the city or region to targeted areas could serve to offset these impacts.

GMA and Countywide Planning Policy Requirements—Housing Element: Alternative 1, No Action, would meet GMA goals regarding compact growth served by multimodal transportation and municipal services. It would not meet new GMA requirements to amend the Housing Element to address new requirements in HB1220 regarding housing opportunities by income band and the removal of racially disparate impacts. Likewise, new housing targets by income band and special needs housing required in Countywide Planning Policies would not be met. Alternative 1 could perhaps conflict with Countywide Planning Policies that direct cities to provide a full range of affordable, accessible, healthy, and safe housing choices to every resident in King County as it would continue to limit the range of housing options in many areas of Seattle.

The a~~A~~ction alternatives would create a new housing element to meet new GMA requirements and address additional housing types and affordability levels. Alternatives 2 through 4 provide more housing types and support transit. Alternative 5 and the Preferred Alternative provide~~s~~ the greatest capacity for housing to meet affordability.

VISION 2050 and Countywide Planning Policies—Centers: Alternative 5 and the Preferred Alternative redesignate~~s~~ Ballard from a secondary urban center under Alternative 1 to a regional center under the new place types with the intent to seek approval as a Regional Growth Center under VISION 2050 and the PSRC Regional Centers process. Also, the 130th/145th Station Area would be designated an urban center (currently called an urban village under Alternative 1) with the intent to seek approval as a Countywide Center by the Growth Management Planning Council. Downtown, First Hill/Capitol Hill, South Lake Union, and Uptown would meet PSRC's future activity unit threshold for Metro Regional Growth Centers (RGCs) under all alternatives. University District and Northgate would be below PSRC's future activity unit threshold for Metro RGCs but be above the threshold for Urban RGCs under all alternatives as would Uptown under the Preferred Alternative which could result in redesignation from Metro to Urban RGC in the future.

~~The~~ Alternative 5 and the Preferred Alternative also expand~~s~~ existing urban centers and villages[5] to help facilitate infrastructure investments and be locations for facilitated environmental review.[6] The Preferred Alternative also splits 23rd and Union Jackson and Othello into two urban centers each to meet size thresholds. The boundary ~~expansions~~ revisions for ~~urban villages~~ centers are intended to allow them to comply with Countywide Center criteria for size and shape. Some current urban villages would not meet criteria as Countywide Centers by existing or planned activity units under Alternatives 1 through 5. Under the Preferred Alternative, all urban centers would meet King County's minimum future density

[5] Alternative 1~~,~~ No Action, would retain the City's Seattle 2035 urban village strategy and center/village designations—the existing urban centers and villages are categorized here according to the new place types proposed under the other a~~A~~lternatives ~~2–5~~ for comparison purposes only. Ballard would remain a "Hub Urban Village" under Alternative 1, would be called an "Urban Center" under the other a~~A~~lternatives ~~2 – 5~~, and would be redesignated as a Regional Center (as shown here) under Alternative 5 and the Preferred Alternative. See **Exhibit 2.1-1** in **Chapter 2** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.

[6] This includes responding to SB 5412 which allows for an infill exemption for housing and mixed uses when considered in an EIS for a Comprehensive Plan. As part of this EIS process state agencies including WSDOT have been consulted and mitigation measures both current regulations and other proposed mitigation could apply to reduce impacts. See **Appendix C** for a list of codes providing mitigation for environmental impacts.

criteria for Countywide Centers, but Green Lake, Lake City, and Madison-Miller would still be outside the size threshold.

Equity & Climate Vulnerability Considerations

The action alternatives would respond to HB1220 affordable housing requirements as well as PolicyLink recommendations to allow "more housing types across the city with equitable access to wealth building and neighborhood opportunities."

The action alternatives allocate a similar or greater amount of growth to villages as the No Action Alternative. Additional growth over the No Action Alternative is planned in Neighborhood Residential areas or in corridors under Alternative 4) or distributed across single family areas with middle housing types (Alternatives 3 and 5 and the Preferred Alternative).

In addition, the action alternatives include new climate policies focused on reducing emissions from buildings and transportation and making the city more capable of withstanding the impacts of climate change.

130th/145th Station Area

The *130th and 145th Station Area Plan* and its vision and strategies would not be implemented under the No Action Alternative. Housing and job growth around both station areas would be minimal.

Alternatives 2 and 5 and the Preferred Alternative would implement the Station Area Plan with compact growth, services, and housing around the station and implement its strategies. The City would meet minimum standards for the Countywide Center of 130th Avenue Station Area by total area and activity units under Alternatives 2 and 5 and the Preferred Alternative but not under Alternative 1. However, existing activity units are slightly below countywide center designation criteria under the Preferred Alternative.

What are some solutions or mitigation for impacts?

Citywide

The action alternatives also propose new housing and place types to help meet affordable housing needs and address racially disparate impacts in support of the City's response to HB1220 (see **Section 3.8 Population, Housing, & Employment**). The action alternatives promote housing types in other bills relevant to middle housing including HB 1110 and accessory dwelling units in HB 1137.

~~If a~~ In this Final EIS, the Preferred Alternative ~~is developed, it should be~~is evaluated for conformity to state and regional plans and policies. Activity units would be met; however, some adjustments to center designation type or acreage may be appropriate ~~It may include reallocating growth assumptions in place types while being in the range of the studied Alternatives~~ (e.g., to meet Countywide Center or Regional Growth Center criteria). See **Section 3.6.2** regarding the Preferred Alternative.

130th/145th Station Area

See above.

With mitigation, what is the ultimate outcome?

No significant unavoidable adverse impacts are anticipated with respect to plans and policies. Inconsistencies with new regional plans and state requirements and the regional growth strategy under the No Action Alternative would be avoided through amendments to the Comprehensive Plan proposed under the action alternatives.

Summary of Thresholds

Exhibit 1.6-13 summarizes potential impacts based on the evaluation in **Section 3.8 Population, Housing, & Employment**.

Exhibit 1.6-13. Plans and Policies Thresholds of Significance

Metric	Threshold	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref.
	Inconsistency with adopted plans and policies: Growth Management Act (GMA).[1]	▼	—	—	—	—	—
	Inconsistency with adopted plans and policies: VISION 2050.[2]	▼	—	—	—	—	—
	Inconsistency with adopted plans and policies: Countywide Planning Policies.[3]	▼	—	—	—	▼	▼
	Inconsistency with adopted plans and policies: 130th/145th Station Area Plan.[4]	▼	—	▼	▼	—	—

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative, and associated analysis in the notes, was added to this exhibit since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.

1 Alternative 1, No Action, would not meet new GMA requirements to amend the Housing Element to address new requirements in HB1220 regarding housing opportunities by income band and the removal of racially disparate impacts. It would not include a new climate element required under GMA.

2 The No Action Alternative would not include a new climate element to meet VISION 2050 policies nor address the findings of the equity evaluation of Seattle 2035 plan.

3 The No Action Alternative would not meet new housing targets by income band and special needs housing required in Countywide Planning Policies and would continue to limit the range of housing options in many areas of Seattle. The Admiral, Morgan, and Upper Queen Anne centers do not meet activity units for Countywide Centers (30 activity unit threshold) in Alternative 5 though their size would meet standards. Under the Preferred Alternative, all urban centers would meet King County's minimum future density criteria for Countywide Centers, but Green Lake, Lake City, and Madison-Miller would still be outside the size threshold.

4 Alternatives 1, 2, and 5 and the Preferred Alternative study the 130th/145th Station Area. Alternative 1 provides limited activity units near the transit investment. Alternatives 2 and 5 and the Preferred Alternative would establish more compact nodes or centers and fulfill the station area plan vision and strategies. Elements of these alternatives could be combined with Alternatives 1, 3, and 4 to integrate the subarea plan.

1.6.8 Population, Housing, & Employment



Source: City of Seattle. 2023.

How did we analyze Population, Housing, & Employment?

The EIS addresses population, employment, and housing, as well as the historical context of racial segregation that has contributed to today's demographic patterns. The evaluation uses city, state, and federal population, employment, and housing data and trends to identify current conditions and areas more at risk of displacement. It considers trends and buildable land capacity information and place types to address differences in the alternatives.

A primary focus of this analysis is the evaluation of how effectively each alternative achieves three objectives:

- Increase the supply, diversity, and affordability of market-rate housing.
- Increase the supply of income-restricted housing.
- Reduce residential displacement.

What impacts did we identify?

Seattle would continue to grow in population and housing supply under all ~~five~~ alternatives; the housing supply could have a different mix of types and affordability. There is a potential for displacement of residents under any of the alternatives though they vary in type and degree.

Seattle's total employment is expected to grow by 158,000 jobs in all alternatives. In all alternatives, a majority of employment growth is expected to occur in ~~urban~~ regional centers such as Downtown, South Lake Union, University District, and Northgate as well as manufacturing industrial areas. The greatest variation across alternatives is in the distribution of growth in the remaining place types. For instance, job growth in neighborhood centers, ~~and~~ frequent transit corridors, and urban neighborhood has the potential to provide more neighborhood-serving businesses and services in areas of the city that currently have few options. The Preferred Alternative ~~2~~ would focus about 14~~5~~% of job growth in these place types~~new neighborhood centers~~, higher than all other alternatives. It also focuses the most growth in residential urban centers. The result is a pattern of job growth that is more dispersed across the city than expected under No Action and the other action alternatives.~~Alternative 5 would distribute about 5% of jobs across neighborhood centers and corridors combined. Alternatives 1, 3, and 4 offer relatively less job growth in these areas~~

What is different between the Alternatives?

Citywide

Supply, Diversity & Affordability

All action alternatives are expected to increase total housing supply more than No Action. The Preferred Alternative would increase total supply by 120,000 units. It would also result in the greatest amount of non-stacked housing (such as townhomes) compared to other alternatives. In Alternative 2 (Focused) and 5 (Combined), a greater share of new housing would be in stacked housing such as apartment buildings. ~~Alternative 3 (Broad) would produce the greatest diversity of housing types, particularly non-stacked housing types such as detached homes, ADUs, 2/3/4/6-plexes, and townhouses.~~ See **Exhibit 1.6-14**.

Exhibit 1.6-14. Projected Net New Housing Units by Housing Type

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
Stacked Housing						
Condominiums	2,261	2,977	3,730	3,127	3,626	3,322
Apartments	73,109	93,815	76,652	88,662	110,079	91,106
Non-Stacked Housing						
>2,000 sq. ft.	1,389	698	1,111	1,111	1,111	4,132
>1,200 – 2,000 sq. ft.	648	533	4,260	1,578	1,128	14,766
≤ 1,200 sq. ft.	2,593	1,977	14,247	5,522	4,056	6,675
Total Net New Housing	**80,000**	**100,000**	**100,000**	**100,000**	**120,000**	**120,000**

Note: Non-stacked housing refers primarily to unit types expected to be built in Urban Neighborhood Residential zones. These may include detached homes, attached, or detached accessory dwelling units, townhomes, or other low to moderate density formats. All of these units could be sold separately or as condominiums to support homeownership opportunities. The Preferred Alternative, and associated analysis in the notes, was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024; BERK, 2024.

Despite its higher overall housing growth estimate, Alternative 2 would produce fewer units that could be owner-occupied compared to Alternative 1 (No Action) due to its emphasis on zones that allow multifamily housing. The Preferred Alternative and Alternative 3 would produce the most units that could be owner-occupied due to ~~its~~ their emphasis on growth in small-scale detached and attached that are typically offered for sale. Over time, changes in consumer preference, housing costs, or laws governing condominium construction could result in changes in the percentage of units that are owner-occupied.

In general, the action alternatives would be expected to reduce competition for housing compared to No Action due to the increased housing growth that they accommodate. Alternative 5 and the Preferred Alternative 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.

Income Restricted Units

Seattle has two programs that support the production of new income- and rent-restricted affordable housing through developer contributions or incentives: Mandatory Housing Affordability and the Multifamily Tax Exemption. Under all alternatives the city is expected to gain additional income-restricted units through these programs.

Mandatory Housing Affordability (MHA): MHA is a program to support the development of new income- and rent-restricted affordable housing in Seattle. To achieve the goal of providing affordable housing and mitigate the impacts of new development, new commercial, residential, or live-work projects in designated zones must contribute to affordable housing. If the City continues the current MHA program, Alternative 5 would most substantially increase the

number of new income-restricted units produced compared to No Action.[7] The Preferred Alternative would have a smaller positive impact (somewhat lower than Alternatives 2 and 4) and Alternative 3 would have no impact. See **Exhibit 1.6-15.**

Exhibit 1.6-15. Projected New Income-restricted Affordable Units through MHA-Residential (Excluding Neighborhood Residential Zones for all Alternatives)

	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Performance Units	1,131	1,614	1,131	1,400	1,787	1,524
Payment Units	9,891	13,544	9,891	13,142	15,505	12,338
Total	**11,022**	**15,158**	**11,022**	**14,542**	**17,293**	**13,862**

Note: This exhibit was added in Chapter 1 since the Draft EIS. These projections assume that the city will not apply MHA requirements in Neighborhood Residential zones. Assumption was 75% payment for stacked flats and 100% payment for attached and detached housing based roughly on recent development. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Source: City of Seattle, 2024.

~~Considering the current MHA requirements~~If the City applies MHA requirements in some or all Neighborhood Residential zones, Alternative~~s 2, 4, and~~ 5 would most substantially increase the number of new income-restricted units produced, compared to No Action, while Alternatives 2, 3, and 4 would have a smaller impact. The City ~~is~~ was considering whether to extend MHA requirements to include development in some or all Neighborhood Residential zones (with a place type name of urban neighborhood under ~~action a~~Alternatives 2-5) but is not considering MHA for Neighborhood Residential zones in the Preferred Alternative.~~, t~~ This would result in a higher total number of potential affordable units produced ~~for the action a~~in Alternatives 2-5, compared to a scenario where Neighborhood Residential zones are excluded. See **Exhibit 1.6-16.**

Exhibit 1.6-16. Projected New Affordable Units through MHA-Residential (Including Neighborhood Residential Zones where Updated in Alternatives 1-5, Preferred Alternative Does Not Apply MHA to Neighborhood Residential Zones)

	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Performance Units	1,131	1,614	1,163	1,400	1,800	N/A
Payment Units	9,891	13,544	13,066~~29~~	13,142~~37~~	16,758~~41~~	N/A
Total	**11,022**	**15,158**	**14,229~~191~~**	**14,542~~537~~**	**18,558~~41~~**	**N/A**

Note: With the exception of the Preferred Alternative, t~~T~~hese projections assume that the City will apply MHA requirements in Neighborhood Residential zones. The Preferred Alternative was added to this exhibit since the Draft EIS. Corrections made to Alternatives 1–5 to match the corresponding analysis in **Chapter 3** are shown in tracks.
Source: City of Seattle, 2024~~3~~.

[7] NR zones currently are one of the only areas of Seattle where MHA requirements do not apply to residential development.

Multifamily Tax Exemption (MFTE): MFTE is a developer incentive that provides a tax exemption on eligible multifamily housing in exchange for setting aside a portion of units as income- and rent-restricted affordable housing. This exemption lasts 12 years, at which point the property owner can renew the tax exemption and affordability requirements or rent those units at market rate. Therefore, new affordable units are added to Seattle's housing supply each year as developers opt into the program, while other affordable units come offline when property tax exemptions expire. **Exhibit 1.6-17** shows projections of net new affordable housing units produced through MFTE under each alternative. These projections are based on current trends in use of the program, and the expected new housing production by zone under each alternative. Alternatives 1 and 3 are not expected to increase net MFTE units overall as the number of new affordable units produced with MFTE would equal the number expiring and returning to market rate. Alternatives 2, 4, ~~and~~ 5, and the Preferred Alternative expect modest growth in the total supply of MFTE units.

Exhibit 1.6-17. Projected Net Gain of Affordable Housing Units through MFTE

	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Total	**0**	~~600~~**725**	**0**	~~450~~**636**	~~525~~**1,129**	**865**

Note: The Preferred Alternative was added to this exhibit since the Draft EIS. Based on calculation errors, edits to correct errors for Alternatives 2, 4, and 5 are shown in tracks.
Source: City of Seattle, 2024~~3~~.

Demolitions and Displacement: Between 2009 and 2022, more than 600 housing units were lost due to demolition each year in Seattle. Demolition of older housing is expected to continue under all alternatives as lots with older homes are redeveloped with newer and higher-density housing. However, the number of units demolished is expected to vary widely by alternative, from 5,030 units in Alternative 1 to ~~9,148~~11,086 units in the Preferred Alternative ~~3~~, as shown in **Exhibit 1.6-18**. This table also shows the ratio of net new units per demolished unit. Here Alternatives 1 and 2 have the highest ratio, while the Preferred Alternative and Alternative 3 have~~s~~ the lowest.

Exhibit 1.6-18. Projected Housing Units Demolished by EIS Analysis Area and Alternative

Area	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Area 1	871	1,192	1,662	1,330	1,758	2,970
Area 2	1,103	1,391	2,636	2,202	2,274	2,657
Area 3	389	534	484	473	565	923
Area 4	810	810	810	810	810	797
Area 5	685	929	735	745	915	1,213
Area 6	565	767	1,404	1,070	1,374	1,492
Area 7	80	85	48	87	140	144

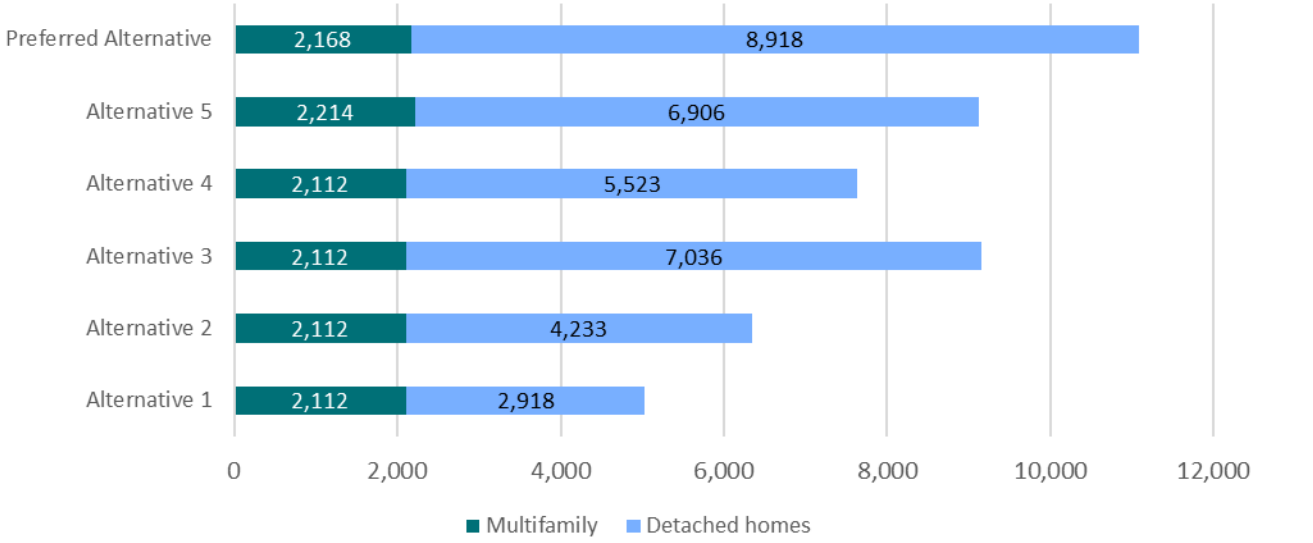
Area	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Area 8	527	637	1,369	918	1,284	890
Total units demolished	**5,030**	**6,345**	**9,148**	**7,635**	**9,120**	**11,086**
Total net new units	80,000	100,000	100,000	100,000	120,000	120,000
Ratio of net new units to units demolished	**15.9**	**15.8**	**10.9**	**13.1**	**13.2**	**10.8**

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Source: City of Seattle, 2024~~3~~. BERK, 2024~~3~~.

There is almost no variation in the number of multifamily units demolished across alternatives. However, there is variation in the amount of detached homes projected to be demolished~~, with the exception that Alternative 5 is expected to result in slightly higher demolitions~~. This is because the alternatives vary ~~primarily~~ in the amount of growth expected in new place types located where detached homes currently predominate. As a consequence, most of the demolitions are expected to be older detached homes, and there is substantial variation among the alternatives in the total number of detached homes expected to be demolished. The Preferred Alternative is expected to result in the most detached home demolitions and most demolitions overall. See **Exhibit 1.6-19**.

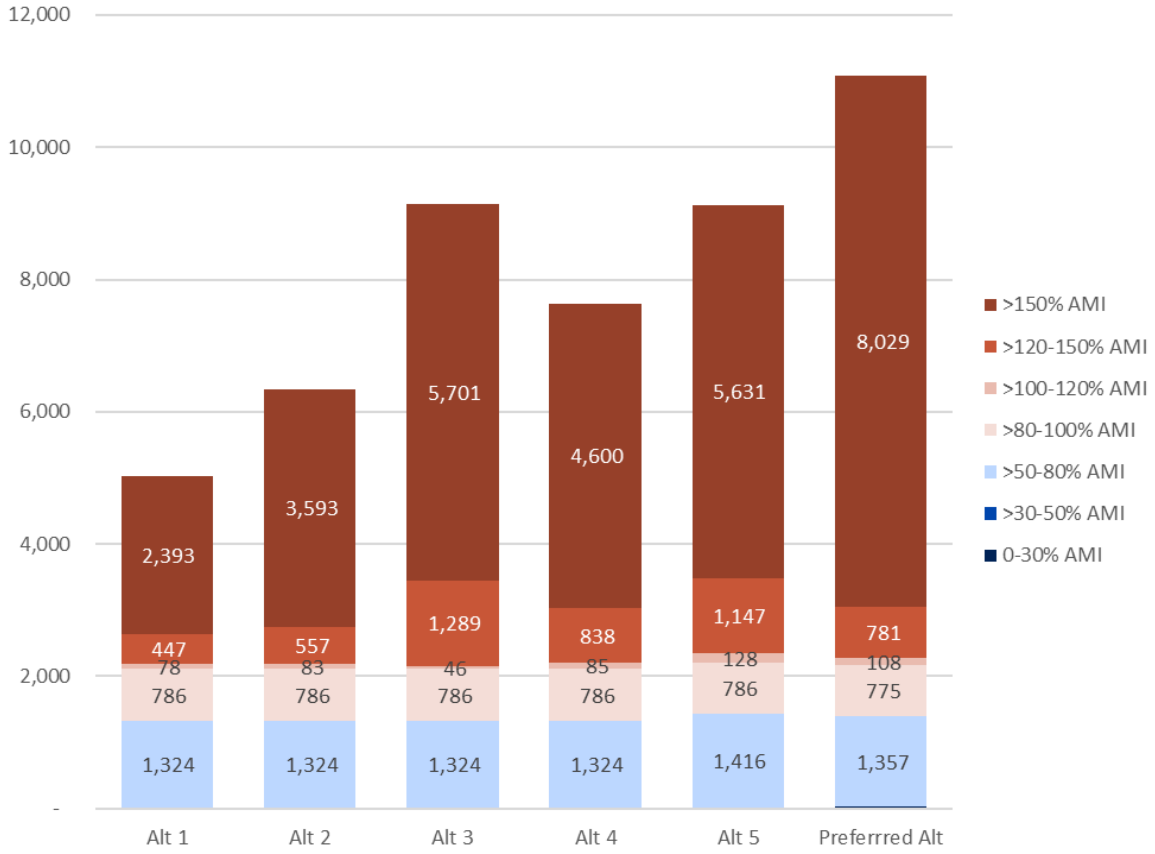
Exhibit 1.6-20 presents projections of housing lost due to demolition by affordability level. This analysis shows that all alternatives are expected to result in the demolition of a similar number of units affordable at 120% AMI or below. The alternatives vary primarily in the number of detached homes demolished, which tend to be affordable only to households with incomes above 120 or 150% AMI.

Exhibit 1.6-19. Projected Housing Units Demolished by Housing Type and Alternative



Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

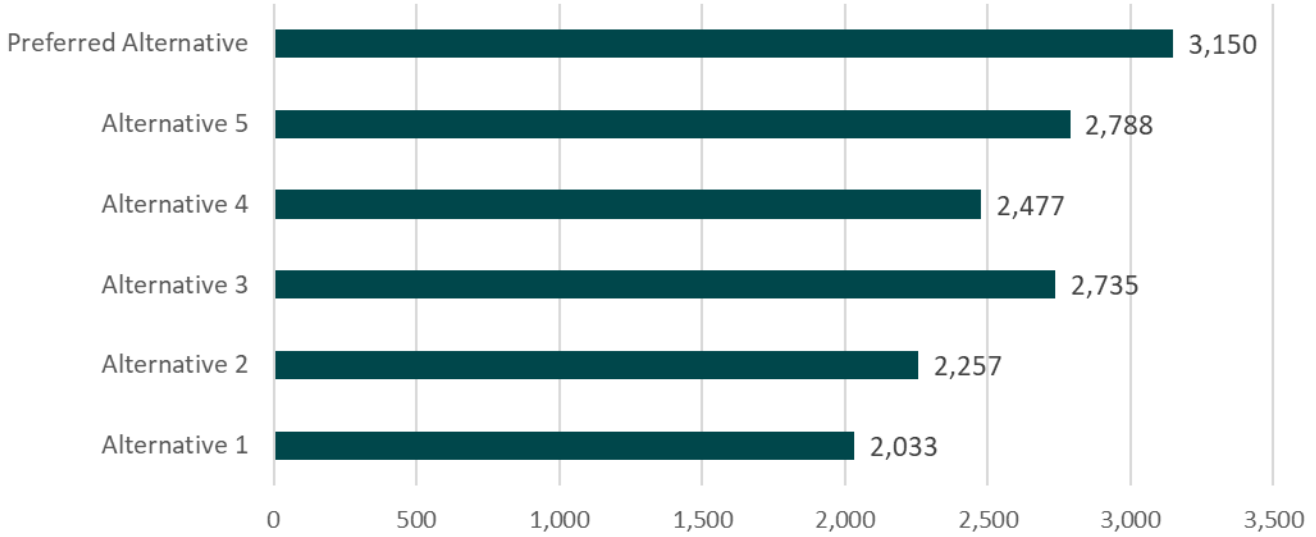
Exhibit 1.6-20. Projected Housing Units Lost to Demolition by Affordability Level



Note: No units from affordable at 30-50% AMI are projected to be demolished in any alternative. A very small number of 0-30% AMI units (2-~~12~~40) could be demolished. These counts are not shown in the chart. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Estimating the number of renter households residing in units projected to be demolished is one way to conservatively estimate how many households could be physically displaced in each alternative. See **Exhibit 1.6-21**. ~~Alternative 5t~~The Preferred Alternative would be expected to result in the greatest potential for renter households displaced due to demolitions, while Alternative 1 would be expected to see the fewest. Alternatives 2 and 5 are expected to create the most new affordable units per unit demolished as described in **Chapter 3**.

Exhibit 1.6-21. Renter Households Physically Displaced by Alternative



Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Equity & Climate Vulnerability Considerations

There is a housing affordability crisis in Seattle that is disproportionately impacting communities of color and lower income residents. Rapidly increasing rents are contributing to extreme housing cost burden, economic displacement, and housing insecurity. Physical displacement is much less common than economic displacement, but its impacts can be devastating for affected households. And when specific racial or ethnic communities are disproportionately impacted by economic and physical displacement, this contributes to the process of cultural displacement.

Skyrocketing ownership housing costs also have equity related impacts. A lack of moderately priced ownership housing options prevents pathways to homeownership and wealth generation for both low and moderate-income households. Achieving homeownership, for moderate-income households, often requires moving outside of Seattle to find more affordable ownership housing options. However, they may need to contend with higher transportation costs due to increased car dependency due to living further from jobs, transit, and services.

- Alternative 1: Although there would continue to be new housing built over the next 20 years, the rate of new housing production would likely continue to fall far short of demand, contributing to rising housing costs and disproportionately inequitable outcomes for low-income and BIPOC community members.
- Alternative 2: Except for Alternative 5, Alternative 2 would provide the greatest benefit for low-income renter households. This is due to the emphasis on increased rental housing production and its potential impact on moderating rental housing cost escalation as well as increased affordable housing production through MHA. However, Alternative 2 would provide the least benefit for moderate-income households seeking to access the homeownership market and associated wealth generation opportunities.

- Alternative 3: Except for No Action, Alternative 3 would provide the least benefit for low-income renter households. That is because rental housing supply and new affordable housing through MHA would only see modest increases compared to No Action. However, Alternative 3 would provide the greatest benefit for moderate income-households seeking to access the homeownership market and associated wealth generation opportunities.
- Alternative 4: Compared to No Action, Alternative 4 would provide benefits for both low-income renter households as well as moderate-income households that seek to access the homeownership market and associated wealth generation opportunities. This is due to an expected increase in rental housing supply, affordable housing production through MHA, and supply of housing types that can be sold to homeowners.
- Alternative 5: 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. Compared to No Action, it would also provide benefits for moderate income-households seeking to access the homeownership market and associated wealth generation opportunities. This is due to the increased supply and diversity of housing types that can be sold to homeowners. However, ~~both~~ Alternatives 3 and 4 and the Preferred Alternative are expected to produce more ownership housing than Alternative 5.
- Preferred Alternative: The Preferred Alternative would provide a similar but slightly lower benefit for low-income renter households as Alternative 5 due to its impact on increasing rental housing supply and new affordable housing through MHA and MFTE. This alternative would provide the greatest benefit for moderate income-households seeking to access the homeownership market and associated wealth generation opportunities. This is due to the increased supply and diversity of housing types that can be sold to homeowners.

130th/145th Station Area

Alternative 1: Both housing and employment growth would be much lower in the station area compared to the other Alternatives. This would limit the number of households and businesses that can benefit from nearby access to the light rail stations. It would also limit the variety of housing choices available.

Alternative 2: Alternative 2 would support transit-oriented development in these station areas at higher levels of density than allowed under current zoning. It is expected to more than double the number of new housing units compared to No Action and increase overall housing supply more than any alternative other than Alternative 5. This would allow many more households to live near light rail transit.

Alternative 5: This Alternative would create a new urban ~~village~~ center around the NE 130th St station area. This change would support transit-oriented development and the most housing and job growth compared to the other alternatives, except the Preferred Alternative, which will result in the same housing and job growth.

Preferred Alternative: The Preferred Alternative would create a new urban center around the NE 130th St station area that would support transit-oriented development. The 130th Station Area would see an increase in housing and job growth under the Preferred Alternative, similar to but slightly lower than Alternative 5.

What are some solutions or mitigation for impacts?

Although not required to address identified impacts, the City could pursue the following kinds of actions to address possible population, employment, and housing conditions.

- ~~**Implement MHA requirements in Neighborhood Residential zones:** The City could apply MHA requirements through zoning changes in Neighborhood Residential zones. This would increase affordable housing production in Alternatives 3 and 5, which contemplate allowing a greater amount and variety of housing in Neighborhood Residential zones.~~**Develop an acquisition strategy for natuarally occurring affordable housing.**
- **Increase funding for programs combating displacement:** To address the potential for residential, commercial, and cultural displacement under any alternative, the City could pursue various actions that support the stability and retention of existing households, and the preservation and creation of new, cultural institutions and businesses. Examples of potential anti-displacement actions include:
  - Increasing funding for Seattle's Equitable Development Initiative (EDI) to expand the ability of community organizations to acquire and develop property in neighborhoods at high risk of displacement.
  - Supporting low-income homeowners to add housing on their property to stay in place and build wealth. Homeowners who have low or fixed incomes may struggle with the rising costs of property ownership, including taxes and maintenance costs, and may also face challenges to adding housing to their property that could generate income or meet their household needs despite current or future zoning capacity that allows additional density. The City could fund programmatic efforts to help homeowners overcome awareness, financing, design, permitting, or other barriers.
  - Strengthen the Office of Economic Development's (OED) small business support programs. OED has provided a range of support services for small businesses, including access to capital, storefront repair, a stabilization fund pilot, and a tenant improvement fund pilot. Resources for these or similar programmatic efforts could mitigate potential commercial displacement pressure.
  - Establish and fund a program that supports tenant or community ownership of rental housing when it becomes available for purchase.
- **Strengthen relocation assistance programs:** The Tenant Relocation Assistance Ordinance and Economic Displacement Relocation Assistance provide relocation assistance to low-income households displaced due to removal or alteration of their housing or increasing housing costs. The City could pursue policy or funding changes that would increase the number of households receiving assistance or the amount of assistance received.

- **Density bonuses:** The City could allow projects that set aside a significant portion of their units as income-restricted affordable housing to receive extra height or floor area.

With mitigation, what is the ultimate outcome?

Over time, additional growth and development will occur in Seattle, and much of this growth will occur through redevelopment. The alternatives vary based on the amount, types, and geographic pattern of existing housing and businesses that may be demolished to make way for new growth. While this can contribute to the risk of physical displacement, that risk is not significantly higher in the action alternatives. Moreover, the benefits in terms of reduced economic displacement pressure and increased production of affordable units offered by the action alternatives outweigh any increased risk of physical displacement. Therefore, no significant unavoidable adverse impacts to population, employment, or housing are expected under any alternative.

Summary of Thresholds

Exhibit 1.6-22 summarizes potential impacts based on the evaluation in **Section 3.8 Population, Housing, & Employment**.

Exhibit 1.6-22. Population, Housing & Employment Summary of Thresholds of Significance

Metric	Threshold	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref.
☒ Equity & Climate	Increase the supply of market-rate housing.[1]	—	△	△	△	▲	▲
☒ Equity & Climate	Increase the affordability of market-rate housing.[2]	—	△	△	△	▲	▲
☒ Equity & Climate	Increase the diversity of market-rate housing.[3]	—	△	▲	△	▲	▲
☒ Equity & Climate	Increase the supply of income-restricted housing.[4]	△	▲	△	▲	▲	▲
☒ Equity & Climate	Reduce residential economic displacement.[5]	▽	△	△	△	▲	▲
☒ Equity & Climate	Reduce residential physical displacement.[6]	—	▽	▽	▽	▽	▽

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative was added to this exhibit, and associated analysis in the notes, since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.

1 Total housing supply will grow under all alternatives. Alternative 5 and the Preferred Alternative would produce the most new units.

2 In general, the action alternatives would be expected to reduce competition for housing compared to No Action due to the increased growth that they accommodate. Alternative 5 and the Preferred Alternative provides the greatest amount of new supply, and therefore would be expected to have the greatest impact on reducing market housing cost pressures. These impacts would be expected across the entire market housing supply, both new and older units.

3 Based on the different place types, Alternative 3 would produce the greatest range of new housing types—detached single family, missing middle, multiplex, apartments. Alternative 5 and the Preferred Alternative have~~has~~

the greatest changes to place types including increasing the size of centers and adding new centers. This would also increase the diversity of housing options available.
4 Most affordable housing production is through the MHA program, and MHA requirements vary geographically. Alternatives 2, 4, and 5 and the Preferred Alternative include the greatest amount of growth in zones that generate MHA performance and payment units.
5 Alternative 5 and the Preferred Alternative are~~is~~ expected to have the greatest impact on reducing economic displacement pressure because ~~it~~ they anticipates the largest increase in housing supply.
6 Alternative 3 with the greatest redevelopment in urban neighborhood areas and Alternative 5 and the Preferred Alternative with the greatest total potential units have the highest potential for physical displacement due to the demolition of existing homes. In Alternatives 1, 2, 4, and 5 and the Preferred Alternative the number of new affordable units substantially exceeds the number of units demolished. In Alternative 3, new affordable units only slightly exceed demolitions, in part because of the assumption that MHA would not apply in NR zones. Alternatives 2 and 5 and the Preferred Alternative are expected to create the most new affordable units per unit demolished.

1.6.9 Cultural Resources

How did we analyze Cultural Resources?

The Cultural Resources evaluation addresses historic-period architectural resources and precontact and historic-period archaeological resources. It is based on a literature review using State and City registers and spatial data, and review by liaisons representing different cultures and expertise. Impacts to cultural resources in the study areas from the No Action Alternative, ~~and~~ four action alternatives, and the Preferred Alternative, were identified by assessing potential for both above- and belowground changes.

Impacts of the alternatives on cultural resources are considered significant if they result in:

- Substantial changes to or alteration of features or characteristics, or loss (removal or demolition) of a cultural resource that prevent their eligibility for inclusion as a designated Seattle Landmark (SL), or inclusion in the National Register of Historic Places (NRHP), National Historic Landmark (NHL) program, or the Washington Heritage Register (WHR).
- More than a moderate adverse impact (potential loss of or alterations to the physical evidence or tangible evidence of cultural history) to Culturally Important Resources (CIR), which for the purposes of this EIS are important to certain cultural groups or communities, whether or not they are listed or eligible for the SL, NRHP, or WHR.

Resources that have been officially determined not eligible for these registers or considered CIR will not be adversely impacted by the proposed alternatives.

What impacts did we identify?

All studied alternatives have the potential to affect districts, sites, landscapes, or buildings, structures, or objects (BSOs) that have been designated as an SL or listed in the NRHP and WHR, and those resources that have been determined eligible for listing in the NRHP. Additionally, the studied alternatives could potentially affect the numerous BSOs and

unidentified archaeological sites that have yet to be surveyed and assessed for potential eligibility for listing in the registers.

Since development may occur in any location in the study area under any alternative, it is possible that cultural resources could be impacted under each alternative. Changes to zoning that allow a wider range of residential and/or commercial growth could spur redevelopment in those locations. This could occur, for example, where the focused growth within neighborhood centers would allow for a wide range of housing types and commercial space or within Neighborhood Residential zones where the broad expansion of housing options would allow for and possibly incentivize increased density on larger lots throughout the study area. Even where there are no formally designated historic properties, there are numerous properties with historic-period buildings, many of which have never been formally surveyed and evaluated for eligibility but could potentially qualify for designation as an SL or listing in the NRHP. Many are located in an area with a High or Very High Risk of archaeological resources.

Demolition and construction projects could require substantial below-groundwork, thus negatively and irreversibly impacting below-ground archaeological and cultural resources. DAHP's archaeological predictive model, used to establish probabilities for precontact cultural resources, depicts much of the land within the study area as within a High or Very High Risk area, primarily because of proximity of Puget Sound, Salmon Bay, Lake Union, Elliott Bay, and the Duwamish River, and the use-history throughout the precontact and historic periods.

Analysis indicates that all alternatives have the potential to affect historic and cultural resources through development/redevelopment in historically marginalized neighborhoods in the study areas.

What is different between the Alternatives?

Citywide

Alternative 1: Redevelopment and development projects due to market pressures under Alternative 1 (No Action) would continue to affect cultural resources, with such impacts as alteration, demolition, damage, or destruction. Alternative 1 includes no additional protections or improvements in planning for consideration of impacts to cultural resources.

Alternatives 2 – 4: Alternatives 2 through 4 would allow more housing than Alternative 1 but still propose most growth in centers, but each would emphasize different locations for additional housing choices: Alternative 2—growth in distributed nodes called neighborhood centers, Alternative 3—middle housing distributed throughout the urban neighborhood place type, and Alternative 4 focusing more attached housing in corridors. While most growth will be in larger centers the additional growth would increase the probability of inadvertent discovery of below ground archaeological and cultural resources as compared to Alternative 1 because of substantial foundation work needed for multi-story buildings.

- **Alternative 2:** Some new neighborhood centers contain or abut listed historic properties or recorded archaeological resources, or contain mapped resources, such as within the Loyal Heights and Upper Fremont (NW Seattle), Wedgwood and Sand Point Way (NE Seattle), Magnolia and Nickerson (Queen Anne/Magnolia), Montlake, Madrona, and Squire Park (Capitol Hill/Central District), Alki, North Delridge/Youngstown, and Gatewood (W Seattle), and Georgetown (Duwamish) Neighborhood Centers.
- **Alternative 3:** Insufficient formal survey and inventory has been undertaken in many of the urban neighborhood areas across the city, leaving broad swaths of historic-period single-family and small-scale multi-family residential buildings as-yet unidentified or evaluated, and thus vulnerable to impacts from development. There are designated SLs, NRHP- and WHR-listed properties and mapped resources sensitivity areas (e.g., High to Very High Risk of archaeological and cultural sensitivity) across the city within the NR zones, such as Dunn Gardens (NRHP-listed) (NW Seattle), James and Pat Chiarelli House (designated SL and NRHP-listed) and the Julian and Marajane Barksdale House (NRHP-listed) (NE Seattle), Fort Lawton Landmark District (designated SL) (Queen Anne/Magnolia), Harvard-Belmont Historic District (designated SL and NRHP-listed) and Frink Park (NRHP-listed) (Capitol Hill/Central District), Schmitz Park Bridge (designated SL and NRHP-listed) (W Seattle), and Joseph Kraus House (designated SL and NRHP-listed) (SE Seattle).
- **Alternative 4:** Under Alternative 4 growth will occur in the areas that contain or abut listed historic properties or recorded archaeological resources, or contain mapped resources sensitivity areas (e.g., High to Very High Risk of archaeological and cultural sensitivity), possibly impacting such cultural resources as the John B. Allen School (designated SL and NRHP-listed) and the Christ the King Catholic Church (CIR) (NW Seattle), the Bryant Elementary School (designated SL) and the Henry Owen Shuey House (designated SL and NRHP-listed) (NE Seattle), Magnolia Public Library (designated SL and NRHP-listed) and the (former) Seventh Church of Christ (designated SL) (Magnolia/Queen Anne), Samuel Hyde House (designated SL and NRHP-listed), Volunteer Park (designated SL and NRHP-listed), Millionaire's Row Historic District (NRHP-listed), Moore Mansion and Bordeaux House (designated SLs) (Capitol Hill/Central District), Fauntleroy Community Church and YMCA (designated SL) (W Seattle), Hat 'n Boots (designated SL) (Duwamish), and Van Asselt School and Old Fire Station #33 (designated SLs), Ota Residence (CIR), and the Jimmie and Betty Eng House (NRHP-listed) (SE Seattle).

Alternative 5: In addition to the Preferred Alternative, Alternative 5 will allow the largest increase in supply and diversity of housing throughout the city. Existing regional centers and urban centers would gain up to 80,000 housing units, while other areas would see up to 40,000 additional housing units in new housing types. It combines the strategies in Alternatives 2, 3, and 4, and expands the boundaries of the city's existing urban centers and urban villages. Alternative 5 applies the proposed land-use concepts of all alternatives, which could incentivize development to increase floor area and height limits, allowing for the construction of dense, multi-story buildings.

Preferred Alternative: The Preferred Alternative combines the strategies of all the Alternatives and will allow for the largest increase in supply and diversity of housing across the city, along with Alternative 5. Similar to Alternative 5, Ballard would become a regional center, and expansions of regional and urban centers will take place, such as at the First Hill/Capitol Hill Regional Center and 23rd & Union-Jackson Urban Center. Similar to Alternatives 2 and 5, the Preferred Alternative has 30 new neighborhood centers, including 5 that are shifting or expanding in comparison to Alternatives 2 and 5, including North Magnolia, High Point, Mid Beacon Hill, Upper Fremont, and Hillman City. Like Alternative 5, most housing growth will be in Area 1 Northwest Seattle, and Area 2 Northeast Seattle, while Area 7 Duwamish, will receive the least housing growth. Growth will take place in neighborhood centers, urban neighborhoods, corridors, select regional centers, and select urban centers. The additional growth would increase the probability of inadvertent discovery of below ground archaeological and cultural resources as compared to Alternative 1 because of substantial foundation work needed for multi-story buildings. As noted above, growth will occur in areas that contain or abut listed historic properties or recorded archaeological resources, or contain mapped resources sensitivity areas (e.g., High to Very High Risk of archaeological and cultural sensitivity), possibly impacting the numerous designated SL, CIRs, and NRHP-listed cultural resources in those areas across the city (noted in Alternatives 2, 3, and 4 above).

Development or redevelopment is likely to impact cultural resources. The main differences among the alternatives are the level of residential development. Considering acres that may be affected by residential development in **Exhibit 3.3-4** and **Appendix G**, the total acres affected are highest under the Preferred Alternative overall, followed by Alternative 3 and Alternative 5. Generally, more development/redevelopment could impact more cultural resources. However, under any of the action alternatives there could be similar impacts to cultural resources due to variability in the location and timing of redevelopment, lack of full cultural surveys or assessments of historic resources, development exempt from SEPA review, and individual development applicant preferences regarding historic preservation.

Equity & Climate Vulnerability Considerations

The City's equity and climate change performance metrics did not specifically address cultural resources. However, Seattle's approach to evaluating and identifying cultural resources did include experts with local community groups to identify culturally important resources (CIRs), in addition to common channels of federal, state, and city inventories and registers. This resulted in identification of black and Hispanic commemorative and historic sites in several areas, mapped and described in **Section 3.9 Cultural Resources**.

Studies by the National Trust for Historic Preservation (NTHP) have noted that while rezoning and redevelopment can address some environmental justice concerns such as poor air and water quality, soil contamination, noise pollution, climate change, and unsafe, disconnected, and inaccessible neighborhoods, some of the land use strategies could also lead to adverse impacts such as the loss of historic and CIRs that have yet to be identified and documented within these communities (Canaan et al. 2021:54–55; NTHP 2021:10; Rypkema 2004).

The state and city SEPA rules allow some minor projects to be exempt from SEPA review. SEPA exemptions vary by location, zone, and use, and by residential density goals. SEPA allows some non-residential and mixed-use exemptions, as well. Some exempted projects are not subject to the same review and could impact cultural resources.

130th/145th Station Area

Under all studied alternatives, development projects would affect cultural resources, with such impacts as alteration, demolition, damage, or destruction.

Alternative 1: Some 3-8 story residential buildings would be allowed near the station consistent with current zoning. The blocks around 130th Street would see an additional 194 housing units and 646 units would be developed at 145th Street. Redevelopment and development projects due to market pressures under Alternative 1 would continue to affect cultural resources, with such impacts as alteration, demolition, damage, or destruction. Impacts would be similar to the Citywide summary above.

Alternative 2: In the 130th/145th Station Area, Alternative 2 would designate three neighborhood centers near 130th Street and Roosevelt Way, 125th Street and 15th Avenue, and 145th Street and 15th Avenue, clustering denser, taller buildings and growth near transit. Development would be more mixed use near the 145th Station Area (with NC3) compared to Alternative 1. Building heights would be allowed up to 75 feet. The area would see 2,208 new housing units and 979 new jobs. Redevelopment and development projects under Alternative 2 could affect cultural resources, with such impacts as alteration, demolition, damage, or destruction.

Alternative 5: Alternative 5 would create an expansive urban center (previously urban village) at the Sound Transit light rail station along both sides of I-5, with zoning including low-rise residential, mid-rise multifamily, and neighborhood commercial (NC2 and NC3), linking Pinehurst's existing commercial area to an expanded residential/mixed-use area near the station. Development would be denser than Alternative 2, with more mixed-use, retail, and commercial buildings, and a wider variety of housing types. Building heights in the urban center would be allowed up to 95 feet, while in the nodes and corridors, building heights could be up to 80 feet. The urban center at NE 130th Street would see the highest residential growth of up to 1,644 housing units, while the neighborhood center at 145th Street and 15th Avenue would receive up to 1,059 housing units. The Station Area would see up to 1,004 new jobs.

Preferred Alternative: Like Alternative 5, the Preferred Alternative will allow for a large urban center along both sides of I-5 at the NE 130th Street Light Rail Station area, with zoning that includes low-rise residential, mid-rise residential, and neighborhood commercial (NC2 and NC3). Under the Preferred Alternative, this urban center would see the highest residential and job growth. The 145th Station Area would be designated as a neighborhood center and would see similar zoning, growth in housing units, and somewhat less job growth. Redevelopment and development projects under the Preferred Alternative could affect cultural resources, with such impacts as alteration, demolition, damage, or destruction. Like Alternative 5, taller building

heights could increase the probability of inadvertent discovery of below ground archaeological and cultural resources because of substantial foundation work needed for multi-story buildings.

Examples of mitigation for impacts for architectural resources are detailed in **Section 3.9.3~~3.7.3~~**.

- Mitigation includes a combination of protection and incentives, e.g., adaptive reuse, prioritizing funds for seismic retrofits to historic properties. Mitigation also includes approaches to seek and integrate the histories and context statements from historically marginalized communities, immigrant communities, and to consult tribes and reflect indigenous perspectives.

Mitigation for adverse impacts to archaeological or cultural resources, could include:

- Modifying demolition review process so that historic review occurs even if SEPA thresholds are increased;
- Prior to commencing site-specific subsurface investigations of soils, notifying the local Indigenous Tribes so an archaeologist can observe the work;
- Funding survey and inventory of archaeological sites;
- Updating tree removal requirements for archaeological sites;
- Employing standard archaeological techniques such as archaeological testing, excavation and data recovery/collection of artifacts, documentation, analysis, sharing evidence with the local Indigenous tribes, and archiving, possibly in a repository for future research;
- Funding public education and outreach, including interpretive signage and/or a museum exhibit;
- Funding interpretive signage and educational programs for BIPOC communities' historic neighborhoods; or
- Funding development of digital and other media content, including film, to share holistic stories of the impacted resource(s).

With mitigation, what is the ultimate outcome?

All the alternatives have the potential for significant adverse impacts to cultural resources in the analysis areas. Such impacts can include physical alteration, damage, or destruction of all or part of a resource; alteration of the characteristics of the surrounding environment that contribute to the property's significance; and the introduction of visual or audible elements that are out of character with the property. Such impacts could alter the characteristics of a historic property in such a way as to diminish its integrity, thus affecting its eligibility to qualify for inclusion in the SL or NRHP.

Advanced planning to eliminate, minimize, or avoid impacts to cultural resources is crucial under all of the alternatives. Review of development projects on a case-by-case basis even if SEPA thresholds are raised will also help to eliminate, minimize, or avoid impacts to cultural resources. The ultimate outcome of such mitigation is to moderate or substantially lessen the adverse impacts to cultural resources before they are lost or significantly altered. With the

implementation of advanced planning or project-specific review, significant adverse impacts to cultural resources can be avoided or minimized.

Summary of Thresholds

Exhibit 1.6-23 summarizes potential impacts based on the evaluation in **Section 3.9 Cultural Resources**.

Exhibit 1.6-23. Cultural Resources Thresholds of Significance

Metric	Threshold	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref.
	Substantial changes to or alteration of features or characteristics, or loss (removal or demolition) of a cultural resource that prevents their eligibility for inclusion as a designated Seattle Landmark (SL), or inclusion in the National Register of Historic Places (NRHP), National Historic Landmark (NHL) program, or the Washington Heritage Register (WHR).[1]	▼	▼	▼	▼	▼	▼
	More than a moderate adverse impact (potential loss of or alterations to the physical evidence or tangible evidence of cultural history) to Culturally Important Resources (CIR), which for the purposes of this EIS are important to certain cultural groups or communities, whether or not they are listed or eligible for the SL, NRHP, or WHR.[2]	▼	▼	▼	▼	▼	▼

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative was added to this exhibit since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.
1 All studied alternatives have the potential to result in change, alteration, or loss of architecturally historic buildings, structures, and objects that might be eligible for future designation on local, state, or federal registers. The alternatives could also have an impact on/damage to archaeological and cultural resources during below-ground work.
2 All studied alternatives have the potential to alter or result in loss of CIR through development. The CIR includes features important to certain cultural groups or communities.

1.6.10 Transportation



Source; SDOT, 2023.

How did we analyze Transportation?

This EIS provides a multimodal analysis of transportation in Seattle to evaluate the potential impacts of the proposed land use alternatives. The following metrics are included as part of the evaluation:

- Mode share by sector
- Transit capacity analysis
- Vehicle Miles Traveled (VMT), Vehicle Hours Traveled (VHT), and average trip speed
- Corridor travel time
- Volume-to-Capacity across screenlines
- Intersection level of service (LOS)
- State facility capacity analysis

Each metric is used to quantitatively evaluate and contextualize impacts.

~~Thresholds of significance utilized in this impact analysis include:~~A significant transportation impact under the No Action Alternative is identified if:

- A subarea would have a percentage of SOV travel exceeding the target stated in the Seattle 2035 Comprehensive Plan.
- A study route would operate over the transit agency crowding threshold.
- VMT per capita exceeds the existing level.
- A corridor would have a travel time LOS grade of F.
- A screenline would exceed the V/C threshold stated in the Seattle 2035 Comprehensive Plan by at least 0.01.

- A signalized intersection would operate at LOS E or F and an unsignalized intersection would operate at LOS F.
- A state facility does not meet the standard set by WSDOT.

A significant transportation impact under the ~~four~~ action alternatives is identified if:

- A subarea that does not exceed its SOV mode share target under the No Action Alternative would exceed its SOV mode share target or a subarea that exceeds its SOV mode share target under the No Action Alternative would have an increase in SOV mode share of at least 1% compared to the No Action Alternative.
- A study route that would operate at or under the transit agency crowding threshold under the No Action Alternative would operate over the transit agency crowding threshold or a study route identified as operating over the transit agency crowding threshold under the No Action Alternative would have an increase in passenger load of at least 5% compared to the No Action Alternative.
- VMT per capita would exceed the VMT per capita under the No Action Alternative.
- A corridor that would have a travel time LOS grade of A-E under the No Action Alternative would operate at LOS F or a corridor that would have a travel time LOS grade F under the No Action Alternative would have an increase in travel time of at least 5%.
- A screenline that would not exceed the V/C threshold under the No Action Alternative would exceed the V/C threshold or a screenline that would exceed the V/C threshold under the No Action Alternative would increase the V/C ratio by at least 0.01.
- The action alternative would cause an intersection that operated acceptably under No Action Alternative to operate unacceptably, or the action alternative would add at least a 5 second delay from the No Action Alternative at an intersection that operated unacceptably under the No Action Alternative.
- A state facility that would meet WSDOT's standards under the No Action Alternative would exceed WSDOT's standards or a state facility that does not meet WSDOT's standards under the No Action Alternative would increase the volume-to-LOS service volume ratio by at least 0.01 compared to the No Action Alternative.

What impacts did we identify? What is different between the Alternatives?

Citywide

Exhibit 1.6-24 and **Exhibit 1.6-25** summarize~~s~~ the potential impacts to Seattle's transportation system under each of the Draft EIS alternatives and Final EIS alternatives, respectively. The purpose of an EIS is to disclose how potential actions by the City may impact the transportation system in comparison to what is expected to occur with currently adopted zoning codes and policies. Therefore, the impacts of each action alternative are assessed against the performance of the transportation system under the No Action Alternative. The impacts identified under the No Action Alternative are also expected to occur under the action alternatives even if those alternatives would not result in additional impacts. Although the

focus of the EIS is not to mitigate conditions under the currently adopted zoning code (i.e., the No Action Alternative), many of the mitigation measures proposed for the action alternatives would also lessen impacts under the No Action Alternative.

The Draft EIS alternatives were analyzed before the Seattle Transportation Plan (STP) was adopted. As noted in the Draft EIS, some transportation mitigation projects could have secondary impacts. For example, the City may choose to increase the capacity to move people along its right-of-way by reallocating space to transit. A reallocation of general-purpose travel lanes would make more efficient use of city streets and help accommodate growth, but could have a secondary impact on auto travel. These types of secondary effects are apparent in the findings of the Final EIS revised modeling which includes assumptions based on the STP network maps, policy direction, and candidate projects. The revised Final EIS modeling indicates that it is likely that the Draft EIS alternatives would have slightly more impacts to roadway users and state facilities with the STP network and policy in place. For example, the screenline impacts identified for the Preferred Alternative may also occur with some of the Draft EIS alternatives. As required, the City would prepare additional analysis and take public and stakeholder input into consideration before implementing specific transportation improvement projects, whether they are included in the STP or identified as mitigation for an action alternative. SDOT may choose not to pursue the projects assumed for modeling purposes due to potential impacts and future outcomes from community engagement, but they are used as a reasonably likely assumption to assess the proposed land use alternative.

Seattle Transportation Plan VMT Target

The Seattle Transportation Plan targets a 37% reduction in VMT by 2044 (relative to a 2018 baseline). However, the PSRC regional travel demand model used for this EIS suggests increases in total VMT for all future year scenarios. To move toward a decreasing VMT trend, the City of Seattle would need to pursue additional strategies related to equitable demand management through vehicle pricing; parking supply and pricing; investments to maximize the comfort, convenience, and reliability of walking, rolling, and riding transit; and land use coordination to increase transit-oriented development. Additional information may be found in **Section 3.10.3 Mitigation Measures**.

Therefore, ~~A~~all action alternatives are expected to have significant impacts to transit passenger load, c~~C~~orridor travel time, screenlines, intersection LOS in the NE 130th/NE 145th Street Subarea, and state facilities. Impacts of Alternatives 2 and 3 would be similar to one another while impacts of Alternative 5 and the Preferred Alternative are expected to be higher in magnitude due to the increased growth. Alternative 4 would fall within this range, likely closer in magnitude to Alternatives 2 and 3 than Alternative 5 and the Preferred Alternative. **Exhibit 1.6-24** and **Exhibit 1.6-25** detail~~s~~ the types and number of impacts expected under each alternative.

In addition to **Exhibit 1.6-24** and **Exhibit 1.6-25**, **Exhibit 1.6-26** and **Exhibit 1.6-27** summarize some of the key metrics ~~across the alternatives~~for the Final EIS alternatives graphically. Similar graphics for the Draft EIS alternatives are shown in **Exhibit 3.10-78** and **Exhibit 3.10-79** in **Section 3.10.2**.

Exhibit 1.6-24. Overview of Significant Adverse Impacts: ~~All~~ Draft EIS Alternatives

Impact Type	Alt. 1—No Action	Alt. 2—Focused	Alt. 3—Broad	Alt. 5—Combined
SOV Mode Share	Duwamish subarea impacted	No additional impacts beyond No Action	No additional impacts beyond No Action	No additional impacts beyond D No Action
VMT per Capita	No	No	No	No
Active Transportation	No	No	No	No
Transit	8 routes: Light Rail 1, 2, and 3 Lines; RapidRide E, J, R, Denny & Fremont	8 routes under No Action + additional impacts to RapidRide E, J, R & Fremont	8 routes under No Action + additional impacts to RapidRide E, J, R & Fremont	8 routes under No Action + additional impacts to RapidRide E, J, R & Fremont
Roadway Users				
Corridor Travel Time	4 corridors: Mercer, Stewart, Olive & Michigan	4 corridors under No Action + additional impact to Olive	4 corridors under No Action + additional impact to Olive	4 corridors under No Action + additional impact to Olive
Screenline	No	No	No	No
130th/145th Subarea Intersection LOS	6 intersections: 145th/Aurora, 145th/5th, 145th/15th, 130th/Aurora, 130th/1st & 125th/15th	Additional impacts to the 6 intersections impacted under No Action	Additional impacts to the 6 intersections impacted under No Action	Additional impacts to the 6 intersections impacted under No Action + impact at 130th/Roosevelt/5th
State Facilities	7 segments along I-5, SR 99, SR 509 & SR 522	7 segments under No Action + additional impacts along I-5, SR 99, & SR 522	7 segments under No Action + additional impacts along I-5, SR 99, & SR 522	7 segments under No Action + additional impacts along I-5, SR 99, SR 509 & SR 522
Safety	No	No	No	No

Source: Fehr & Peers, 2023.

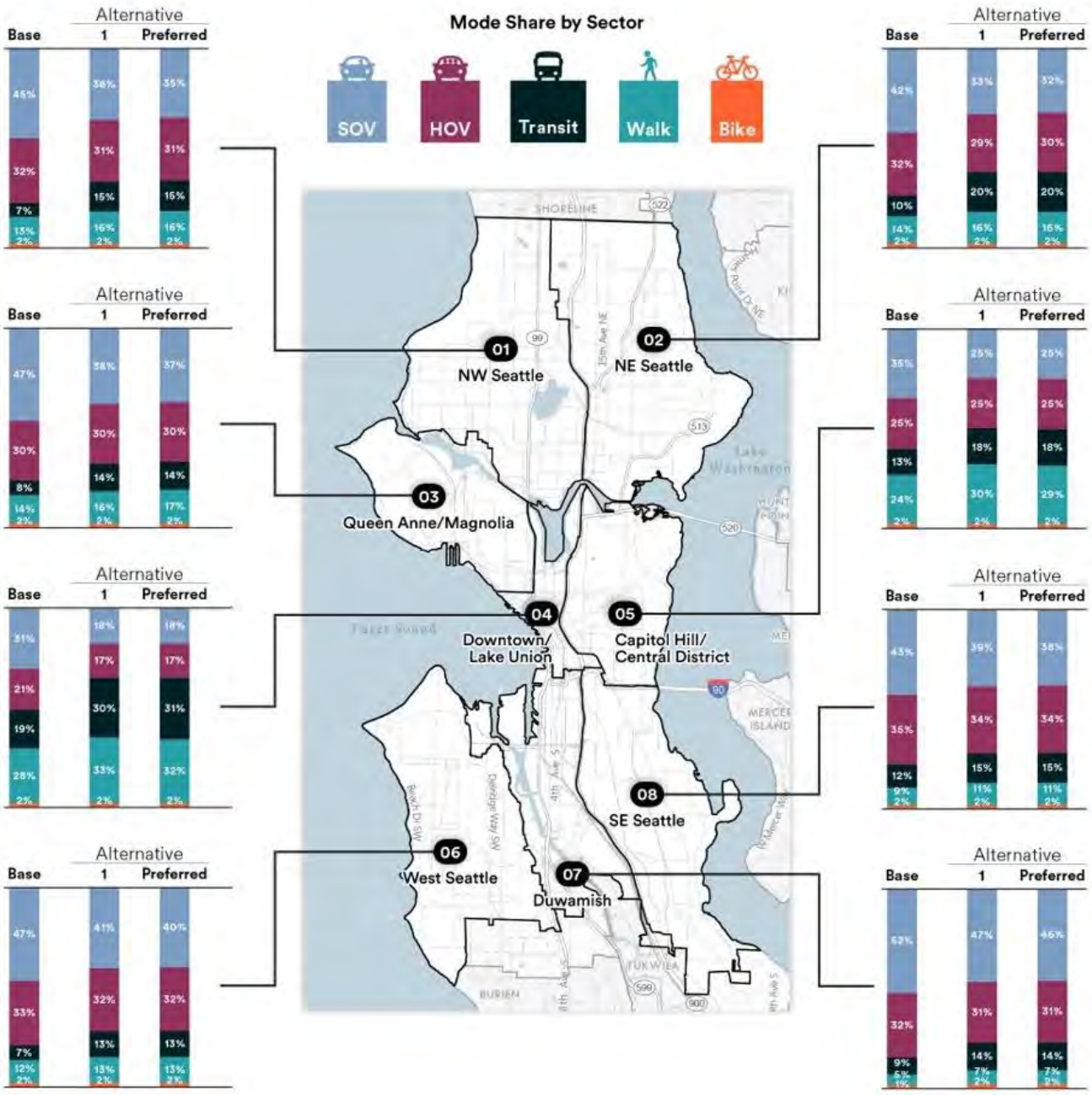
Exhibit 1.6-25. Overview of Significant Adverse Impacts: Final EIS Alternatives

Impact Type	Alt. 1—No Action	Preferred Alternative
SOV Mode Share	Duwamish subarea impacted	No additional impacts beyond No Action
VMT per Capita	No	No
Active Transportation	No	No
Transit	7 routes: Light Rail 2 and 3 Lines; RapidRide E, J, R, Denny & Fremont	7 routes under No Action + additional impacts to Light Rail 2 Line and RapidRide E, J, R, Denny & Fremont; new impact to RapidRide 65th
Roadway Users		
Corridor Travel Time	6 corridors: 25th Avenue NE, Mercer, Stewart, Olive, Boren & Michigan	6 corridors under No Action + additional impacts to Mercer and Stewart; new impact to Denny
Screenline	3 screenlines: Ship Canal - Fremont Bridge; Ship Canal - University & Montlake Bridges; East of I-5 – NE Northgate Way to NE 145th St	3 screenlines under No Action + additional impacts to Ship Canal - Fremont Bridge and Ship Canal - University & Montlake Bridges
130th/145th Subarea Intersection LOS	5 intersections: 145th/Aurora, 145th/15th, 130th/Aurora, 130th/1st & 125th/15th	Additional impacts to the 5 intersections impacted under No Action + impacts at 130th/Meridian and Roosevelt/125th/10th
State Facilities	8 segments along I-5, I-90, SR 99, SR 509 & SR 522	8 segments under No Action + additional impacts along I-5, I-90, SR 99, SR 509 & SR 522
Safety	No	No

Note: This exhibit is new since the Draft EIS.

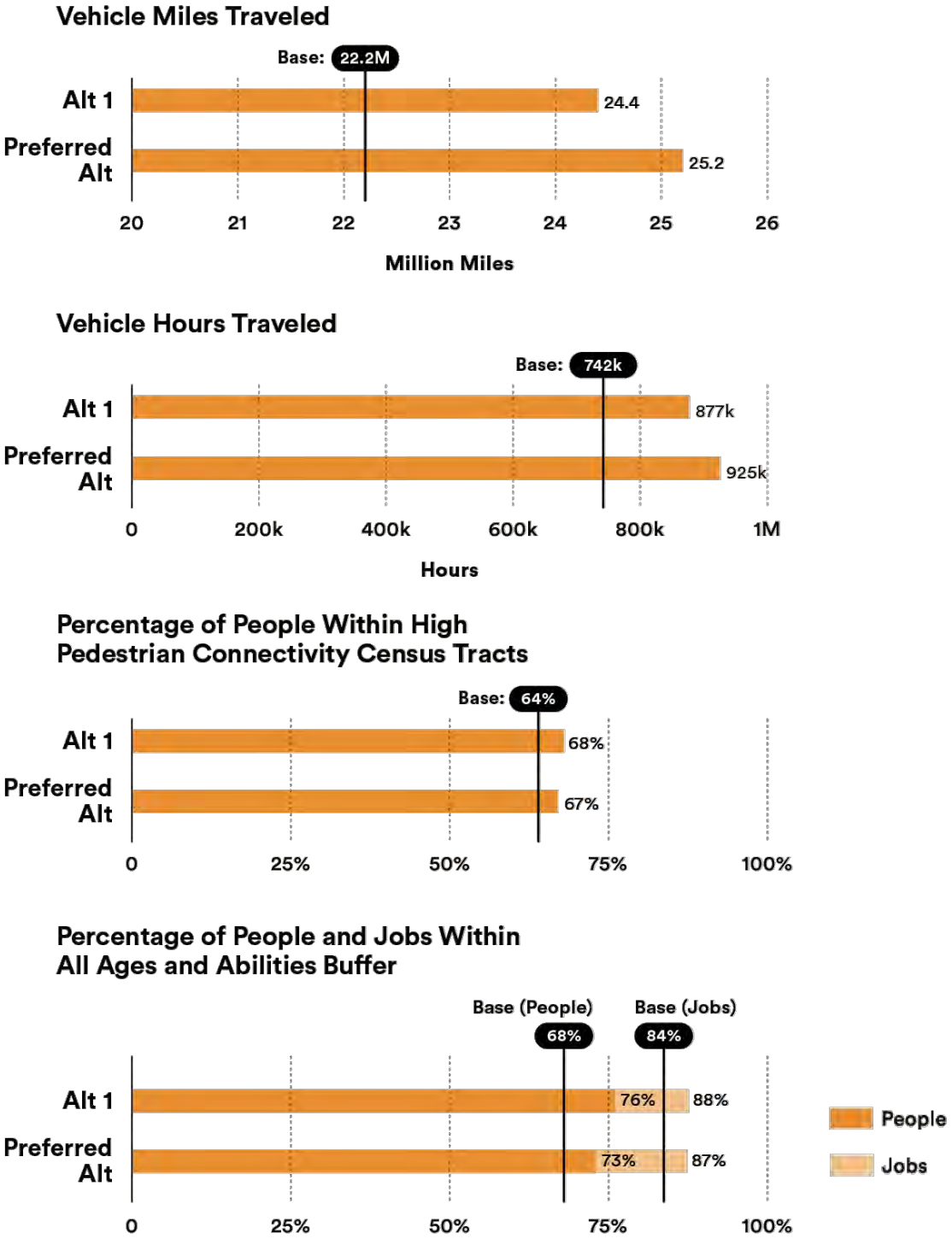
Source: Fehr & Peers, 2025.

Exhibit 1.6-26. Transportation Metrics ~~Across the~~: Final EIS Alternatives



Notes: This exhibit was updated since the Draft EIS to show only the updated Alternative 1, No Action, with STP and the Preferred Alternative. Base refers to 2019. All alternatives are studied with 2044 as a horizon year.
Source: Fehr & Peers, 202<u>5</u>~~3~~.

Exhibit 1.6-27. Citywide Transportation Metrics: Final EIS Alternatives



Note: This exhibit was updated since the Draft EIS to show only the updated Alternative 1, No Action, with STP and the Preferred Alternative.

Source: Fehr & Peers, 2025~~3~~.

130th/145th Station Area

The following intersections within the 130th/145th Station Areas could be significantly impacted by one or more action alternatives:~~Under Alternative 1, six intersections are expected to no longer meet the LOS D threshold, constituting a significant impact. These include:~~

- N 145th Street / Aurora Avenue N
- NE 145th Street / 5th Avenue NE
- NE 145th Street / 15th Avenue NE
- N 130th Street / Aurora Avenue N
- N 130th Street / Meridian Avenue N
- N 130th Street / 1st Avenue NE
- NE 130th Street / Roosevelt Way NE / 5th Avenue NE
- Roosevelt Way NE / NE 125th Street / 10th Avenue NE
- NE 125th Street / 15th Avenue NE
- ~~Under Alternative 2, six intersections are expected to fall below the LOS D threshold; these intersections are the same as those identified under Alternative 1. However, operations are expected to degrade with five of the six intersections falling from LOS E to F. All six intersections would experience at least five additional seconds of delay (the impact threshold) and therefore are considered to have a significant impact under Alternative 2.~~

Relative to the No Action condition, increases in ~~D~~delay~~s~~ would generally be longest ~~under~~ with Alternative 5 and the Preferred Alternative because they include the highest increment of growth. ~~Under Alternative 5, impacted intersections would include the six intersections identified under the other Alternatives as well as the intersection of NE 130th Street/Roosevelt Way NE/5th Avenue NE which would fall from LOS D to LOS E.~~

What are some solutions or mitigation for impacts?

Citywide

The mitigation strategies in **Section 3.10 Transportation** include:

- Transportation Systems Management and Operations (TSMO)
- Transportation Demand Management (TDM)
- Pedestrian and Bicycle System Improvement
- Transit Strategies
- Parking Management Strategies
- Safety Strategies



Source: City of Seattle, 2023.

Equity & Climate Vulnerability Considerations

Providing additional housing growth in areas with more complete infrastructure could advance equity by expanding the opportunity for more people to live in those areas. From that perspective, all of the action alternatives could advance equity by providing more housing opportunities throughout the city with Alternative 5 and the Preferred Alternative providing the most opportunity through ~~its~~ higher housing targets.

An important consideration for climate vulnerability and health disparities is the distribution of effects from emissions, generated by personal and freight vehicles. Underserved communities often face the highest effects of vehicle emissions; for example, freight traffic emissions or poor air quality due to close proximity heavily congested roadways and freeways. Total VMT generated by each alternative was estimated using the SoundCast model. The action alternatives are expected to result in higher VMT than the No Action Alternative due to the increased growth levels. The increase for Alternatives 2 and 3 is expected to be approximately 1% higher than the No Action Alternative and for Alternative 5 and the Preferred Alternative are~~is~~ expected to be approximately 3% higher. Alternative 4 would fall within that range and likely most similar to Alternatives 2 and 3. Therefore, it is possible that the action alternatives—Alternative 5 and the Preferred Alternative in particular—could result in additional vehicle emissions near underserved communities along high vehicle emissions roadways.

From a regional perspective, accommodating more growth within dense urban areas like Seattle provides better climate outcomes than if that growth were accommodated elsewhere. Therefore, at a regional scale, concentrating more growth within Seattle is expected to lead to travel behaviors with lower impacts to climate vulnerability than if that growth occurred in outlying areas. Because all of the action alternatives would accommodate more growth than the No Action Alternative, they are expected to result in better climate outcomes with Alternative 5

and the Preferred Alternative providing the most benefit as it would accommodate the highest level of housing growth within Seattle.

130th / 145th Street Station Area

~~Analysis of the action alternatives, relative to the No Action Alternative 1, identified seven impacted intersections.~~ The following ~~impacted~~ intersections ~~are listed below~~ within the 130th/145th Station Areas could be significantly impacted by one or more action alternatives:

- N 145th Street / Aurora Avenue N
- NE 145th Street / 5th Avenue NE
- NE 145th Street / 15th Avenue NE
- N 130th Street / Aurora Avenue N
- N 130th Street / Meridian Avenue N
- N 130th Street / 1st Avenue NE
- NE 130th Street / Roosevelt Way NE / 5th Avenue NE
- Roosevelt Way NE / NE 125th Street / 10th Avenue NE
- NE 125th Street / 15th Avenue NE

Each significantly impacted intersection was evaluated to identify potential mitigation measures that would address delay impacts such that intersection delays would not exceed the five second impact threshold relative to Alternative 1.

Some impacts could be addressed with more minimal interventions such as signal timing and phasing modifications while others would require physical changes to the intersections to expand capacity, for example adding turn pockets or lanes. However, adding physical capacity to these intersections is likely not practical or desirable due to right-of-way constraints and potential secondary impacts to other modes, and conflicts with the network maps and policy direction of the STP. As described in the analysis for the Preferred Alternative, the modeling assumptions based on the STP network maps, policy direction, and candidate projects include reconfiguring NE 130th Street and NE 145th Street to reallocate some general purpose vehicle capacity to facilities for other modes such as transit lanes, bicycle lanes, and/or widened sidewalks. The adopted STP also includes potential ~~Instead, the City would likely pursue~~ multimodal improvements aimed at making transit, walking, and biking more convenient and comfortable such that people have more options to choose from when traveling through the neighborhood. ~~The Seattle Transportation Plan (STP) outlines the types of multimodal improvements that are being considered.~~ Therefore, it is likely that intersection LOS at some locations would continue to operate below the threshold set forward in this EIS.

With mitigation, what is the ultimate outcome?

Regardless of the alternative selected, increased travel demand is expected to result in potentially significant adverse impacts to transit passenger load, corridor travel time, screenlines, intersection LOS in the NE 130th/NE 145th Street Subarea, and state facilities.

~~The City is expected to pursue targeted transportation capacity improvements focused on improved transit, bicycle, pedestrian, and freight connections. Additionally, the City will manage demand using policies, programs, and investments aimed at shifting travel to non-SOV modes. However, the magnitude and duration of traffic congestion during peak periods (as measured using corridor travel time) is expected to be exacerbated as growth continues to occur.~~

Significant impacts to transit were identified under all action alternatives with respect to transit passenger loads. Mitigation measures could lessen the severity of the passenger load impacts. However, due to the increment of change projected, service levels may not be able to fully mitigate the projected impacts. Therefore, a significant unavoidable adverse impact to transit capacity is expected.

The City is expected to pursue targeted transportation capacity improvements focused on improved transit, bicycle, pedestrian, and freight connections. Additionally, the City will manage demand using policies, programs, and investments aimed at shifting travel to non-SOV modes. However, the magnitude and duration of traffic congestion during peak periods (as measured using corridor travel time) is expected to be exacerbated as growth continues to occur.

Some combination of the travel demand management strategies could be implemented to reduce the magnitude of SOV travel. These programmatic measures may lessen the severity of some of the potential impacts, particularly the travel time impacts which are fairly limited in scope. However, in the absence of state facility capacity expansion beyond that already planned and funded or other increased vehicle capacity across the Ship Canal, the action alternatives may still result in potentially significant unavoidable adverse impacts to state facilities and screenlines.

Some of the impacts to subarea intersections would require physical capacity expansions which are unlikely to be implemented due to right-of-way constraints and potential secondary impacts to other modes. Therefore, the intersection impacts are not expected to be fully mitigated and the action alternatives may still result in a significant unavoidable adverse impact to intersection LOS.

Summary of Thresholds

Exhibit 1.6-28 summarizes potential impacts based on the evaluation in **Section 3.10 Transportation** (summarized in **Exhibit 1.6-24**).

Exhibit 1.6-28. Transportation Impact Thresholds and Alternative Comparison

Metric	Threshold Summary	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref.
	SOV travel exceeding the 2035 Plan target/ +1% over no action	▼▼	—	—	—	—	—
☒ Equity & Climate	VMT increase	Future baseline	▽	▽	▽	▽	▽
☒ Equity & Climate	VMT per capita exceeds the existing level / no action level	—Future baseline	—	—	—	—	—
☒ Equity & Climate	Active Transportation	—	—	—	—	—	—
	Over the transit agency crowding threshold/ +5% no action	▼▼	▼▼	▼▼	▼▼	▼▼	▼▼
	Corridor would have a travel time LOS grade of F / +5% no action	▼	▼	▼	▼	▼	▼
	Screenline exceeding the 2035 Plan target by 0.01/ +.01 over no action	▼▼—	▼▼—	▼▼—	▼▼—	▼▼—	▼▼
	130th/145th Subarea Intersection LOS 3 or F / +5 seconds over no action	▼▼	▼▼	▼▼	▼▼	▼▼	▼▼
	State Facilities: Does not meet the standard set by WSDOT / increase by at least 0.01 over no action	▼▼	▼▼	▼▼	▼▼	▼▼	▼▼
	Safety	—	—	—	—	—	—

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative, and associated analysis in the notes, was added to this exhibit since the Draft EIS—additional revisions to the impact summary for Alternatives 1–5 are shown in tracks. The findings have been updated for Alternatives 1 through 5 based on the findings of the Final EIS revised modeling. With the STP network maps, policy direction, and candidate projects in place, it is likely that the Draft EIS alternatives would have slightly more impacts to roadway users and state facilities. In particular, the screenline impacts identified for the Preferred Alternative may also occur with some of the Draft EIS alternatives.

1.6.11 Public Services

How did we analyze Public Services?

This section addresses the potential impacts on public services associated with each alternative. Public services are defined as police, fire, emergency medical; parks and recreation; and schools. These services are provided citywide principally by the City of Seattle for police, fire, and parks, and by the Seattle Public Schools for education. The evaluation considers available capital and operational plans and data from service providers such as calls for service, distribution and types of facilities, and usage.

Impacts of the alternatives are considered significant if they:

- Result in insufficient parks, open space, and trail capacity to serve expected population based on existing levels of service.

- Create inconsistencies with shoreline public access policies.
- Result in increases in public school enrollment that cannot be accommodated through regular school planning processes.
- Increase demand for police or fire and emergency that can't be accommodated through regular planning and staffing processes.
- Result in insufficient capacity to handle solid waste under current Seattle Public Facility plans.

What impacts did we identify?

Demand for new park acres would increase under each alternative ~~if the City maintains its 8.0 acres per 1,000 population level of service~~. Greater population growth across the city could increase demand for shoreline public access. ~~New levels of service are anticipated to be applied.~~

Demand for police, fire, and solid waste services would increase with greater population and employment growth. Additional police officers, fire units, and solid waste services would be needed to maintain current levels of service. action alternatives would update level of service policies and capital facility plans as needed.

What is different between the Alternatives?

Parks

Citywide

The 2024 Parks and Open Space Plan's adopted level of service aims to provide parks and park facilities within a 10-minute walk of all residents. As of 2023, approximately 95% of the City's population are within a 10-minute walk of a park or park facility. ~~The current parks level of service is 8.0 acres per 1,000 population (from Seattle 2035 and 2017 Parks and Open Space Plan). However, the city is considering options for updating the level of service as part of the Comprehensive Plan Update. The goal of updating the level of services is to make it more consist with the City's goals and approach to acquisition.~~

Additional park acres would be needed under each alternative if the City maintains its 8.0 acres per 1,000 population level of service. Currently, Seattle Parks and Recreation manages 6,478 acres of parks.

~~The acreage needed would range from 1,331 to 1,997 acres between Alternative 1 and Alternative 5, with Alternatives 2 through 4 requiring an additional 1,664 acres.~~ The alternatives would add more growth including within a 10-minute walk to the parks, and increase demand and use of current parkland. Alternative 1 would have the lowest additional demand with 80,000 more dwelling units and Alternative 5 and the Preferred Alternative the greater demand at 120,000 new housing units. Within each analysis area, the population demand would be highest under Alternative 5 except that Area 4 Downtown would have the same growth and acres needed under all alternatives. Under each alternative, expected population growth is lowest in Area 7 due to the focus on employment (except

in South Park). ~~Within each analysis area, the acres required are highest under Alternative 5. See Exhibit 1.6-28.~~ The City currently has 6,478 acres of parkland. If no new acres are added to the City's inventory, the ~~LOS~~ rate of acres per 1,000 would drop. See **Exhibit 1.6-29**.

Exhibit 1.6-29. Acres per 1,000 Population if Park Inventory Does Not Increase

	Actual 2022	Actual 2023	POS 2035	Alt. 1 2044	Alt. 2-4 2044	Alt. 5 2044	Preferred 2044
Population	762,500	779,200	802,358	966,358	862,500	1,007,358	1,007,358
Rate: Acres per 1,000 population	8.50*	8.31	8.07	6.70	6.43	6.18	6.18

Note: This exhibit was added since the Draft EIS. Adds potential population of 2.05 persons per household within new housing units to an estimated 2024 base population of 802,358 accounting for housing under construction or permitted.
*The acres of parks increased between 2017 and 2024 from 6,414 to 6,478. The 2024 estimate is used in this table.
Sources: OFM, 2022; Seattle Parks and Recreation, 2017; BERK, 2024.

~~**Exhibit 1.6-28. Additional Acreage Needed to Meet Parks LOS by Alternative**~~

~~Alternative~~	~~Total Net Acreage Needed~~
~~**Alternative 1**~~	~~1,312~~
~~**Alternative 2**~~	~~1,640~~
~~**Alternative 3**~~	~~1,640~~
~~**Alternative 4**~~	~~1,640~~
~~**Alternative 5**~~	~~1,968~~

~~Notes: Converts housing units to population using a persons per household of 2.05 regional housing target efforts. The 8 acres per 1,000 population is applied to net population growth.~~
~~Source: BERK, 2023.~~

~~The acreage needed would range from 1,312 to 1,968 acres between Alternative 1 and Alternative 5, with Alternatives 2 through 4 requiring an additional 1,640 acres. Within each analysis area, the acres required are highest under Alternative 5 except that Area 4 Downtown would have the same growth and acres needed under all alternatives. Under each alternative, expected population growth is lowest in Area 7 due to the focus on employment (except in South Park).~~

130th/145th Station Area

Within and adjacent to the station study area are parks and open space including Jackston Park Golf Course, Flicker Haven Natural Area, and Northacres Park. All alternatives would result in an increased demand for parkland, with most demand under Alternative 5 and the least demand under Alternative 1 in the 130th Street Station Area. The Preferred Alternative has a slightly lower demand in the 130th Street Station Area compared to Alternative 5. In the 145th Street Area, demand for parkland would be slightly higher under Alternative 2 and Alternative 5 than the No Action Alternative (with demand highest under Alternative 2). The Preferred Alternative has the lowest demand similar to the No Action Alternative.

Schools

Citywide

It is not possible to develop an accurate twenty-year projection of school needs given the wide variety of factors that influence these numbers and the recent fluctuations in public school enrollment. As a high-end estimate of potential impacts, it may be helpful to estimate the number of new classrooms that would be needed if recent trends change and the percentage of the total population enrolled in Seattle Public Schools holds steady over the next twenty years.

Applying this rate to expected population growth shows a range of 10,755~~912~~-16,132~~368~~ students generated by each alternative, the least under Alterative 1 and the most under Alternative 5 and the Preferred Alternative. Depending on the grade level and pace of housing and population growth, new classrooms or schools could be needed over time to accommodate growth.

Based on planning level estimates of students per school, there could be a need between 436-655 classrooms. Under all alternatives, most population growth, and therefore students, would be added in areas 1 and 2. Student growth in Area 4 would be the same across ~~all~~ Alternatives 1-5 and would likely go to schools in areas 3 and 5 as there are no schools located in Downtown. The Preferred Alternative has a slightly lower demand in Area 4. Areas 6, 7, and 8 would have the second highest share of population and students in all the action alternatives 1-4 whereas in the Preferred Alternative Areas 3-5 are the second highest share.

Within the analysis areas, most growth would be directed to centers under all alternatives and schools in those areas would be most affected. However, in Alternatives 2-5 and the Preferred Alternative, more areas currently zoned Neighborhood Residential would see growth, which may be focused around neighborhood centers, corridors, or elsewhere distributed through distributed growth of missing middle housing types.

While K-12 public school enrollment has declined over the last 5 years, future population growth has the potential to increase student enrollment in various areas throughout the city. Seattle Public Schools monitors changes in enrollment to track expected future needs and would adjust their enrollment projections accordingly for future planning cycle. SPS would respond to the exceedance of capacity as it has done in the past by adjusting school boundaries and/or geographic zones, adding or removing portables, adding/renovating buildings, reopening closed buildings or schools, and/or pursuing future capital programs.

130th/145th Station Area

There would be an increase in housing, population, and students with most under Alternative 5 and least under Alternative 1. Depending on alternative, the number of students could be greatest in 130th Street Station (Alternative 5) or at 145th Street (Alternative 2). The Preferred Alternative is in the range below Alternative 5.

Police

Citywide

Growth in housing and jobs is expected to occur incrementally under all alternatives. For the purposes of the EIS analysis, increased density of population and jobs is anticipated to increase the potential demand for police services. However, many factors can influence crime rates. Literature and studies have identified population density and socioeconomic conditions (diminished economic opportunities, concentrations of poverty, high level of transiency, low levels of community participation) as factors as well as prevalent attitudes towards crime and crime reporting. Property crimes are more prevalent than violent crimes and property crimes such as robbery and motor vehicle theft tend to occur at intersections rather than in whole neighborhoods. Victims of crimes are also more likely to be persons of color and younger.

The estimated number of officers per 1,000 residents is 1.4 in 2022. Given that SPD staffing levels are as low as they have been since 1980 based on data collected by the Washington Association of Sheriffs and Police Chiefs (WASPC), this analysis uses a rate of 1.73~~8~~ officers per 1,000 residents, which is the average rate between 2010 and 2022.

Based on population and housing growth alone Alternative 1 would have the least demand and Alternative 5 and the Preferred Alternative the most demand for police staffing. Most demand would occur in areas with the greatest planned growth in Areas 1 and 2. Area 4 Downtown may need alternative ratios with a focus on office employment as well as residential uses. Area 7 may also need other personnel depending on needs with industrially focused land use. See **Exhibit 1.6-30**.

Exhibit 1.6-30. Estimate of Officer FTEs per 1000 Residents at Avg. LOS 2010-2022

Alternative	Area 1	Area 2	Area 3	Area 4*	Area 5	Area 6	Area 7*	Area 8	Total
Current (est.)	219.0	177.7	100.5	143.3	193.1	128.0	6.3	109.3	1,077.0
Alternative 1	266.6	222.3	121.2	212.8	239.2	148.9	13.3	132.3	1,356.6
Alternative 2	283.6	242.6	128.8	212.8	250.5	160.9	14.6	136.7	1,430.5
Alternative 3	280.6	249.7	123.8	212.8	241.1	163.7	13.4	145.4	1,430.5
Alternative 4	279.3	252.8	123.5	212.8	241.3	163.2	13.4	144.1	1,430.5
Alternative 5	295.2	262.1	129.2	212.8	249.7	176.8	19.6	158.9	1,504.3
Preferred	310.0	261.1	132.3	211.1	255.6	173.2	12.0	147.2	1,502.6

Note: the level of service calculation is based on Seattle Police Department's average level of service from 2010-2022 which is 1.73~~8~~ officers per 1,000 residents. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
*Area 7 is predominantly industrial and will be regardless of alternative growth strategy.
Source: Washington Association of Sheriffs and Police Chiefs, 2023, BERK, 2024~~3~~.

130th/145th Station Area

Incremental growth under each alternative would contribute to demand for officers in Area 2 with least under Alternative 1 and most under Alternative 5. The Preferred Alternative would have the second highest level of demand in the station area. See **Exhibit 1.6-30**.

Fire/Emergency Medical Services

Citywide

Growth in worker and residential populations in the study area is expected to lead to an increased number of calls for aid, basic and advanced life support, and other emergency services. Growth is expected to occur incrementally under all alternatives, as individual development projects are constructed. The Seattle Fire Department would attempt to maintain response times consistent with or better than current performance levels as the population grows. Over time, additional staffing and equipment within each analysis area would be required in order to maintain or improve performance levels.

Additional units would need to be added to meet the current levels of service of apparatus per 1,000 dwelling units. However, based on Seattle Fire Department's Live dispatch dashboard as well as the SFD 2021 annual report, citywide unit additions should reflect aid unit prioritization over other fire units. Across all alternatives, each subarea or battalion should have at least a single aid unit stationed at a centrally located station to limit fire unit dispatches on aid calls.

Secondarily, the recommendations for Area 4 are consistent across all alternatives and reflect the growing need for an additional unit to fill the gap in service in the South Lake Union neighborhood.

Alternative 5 and the Preferred Alternative having the highest growth has the greatest need for apparatus. More apparatus under any of the alternatives may require additional personnel and expanded stations. Any potential future fire facility, staffing, or equipment needs will be included as part of the City's annual Budget and Capital Improvement Program process.

130th/145th Station Area

The 130th and 145th Station Area is in Area 2, and between SFD Stations 24, 31 and 39. These stations' units include two engines, one ladder, and one air unit. Growth in the station areas could increase demand.

- Alternative 1: This area is currently identified as a hole in service and may require additional units at the Bitter Lake fire station to meet minimum service standards. This likely would not require a new station given that nearly all development is targeted at urban centers and the Northgate station is already well equipped with support units in case of multiple calls to the transit station area.
- Alternative 2: Fire services at the station area would require either a new station or additional units at Bitter Lake to support higher density housing, which results in additional aid calls as well as one additional firefighting unit as is customary at new stations. SFD has identified this area as a hole in service that falls just outside of the minimum response buffer of two different stations; providing additional units at one or both stations could better equip them to handle increased demand.
- Alternative 5 and the Preferred Alternative: This alternative presents that largest increase in unit needs for the transit stations areas. ~~Alternative 5:~~ If an additional aid unit is provided at each of the nearby stations at Bitter Lake and Lake City, SFD can maintain and even

improve the service levels of the station area without being forced to cross Interstate-5 which may present a challenge depending on the time of day.

Solid Waste

Citywide

Growth in residential, commercial, and self-haul solid waste is expected to increase under all alternatives.

Exhibit 1.6-31 and **Exhibit 1.6-32** offers estimates of each solid waste stream by customer types for alternatives based on job growth estimates and housing units. The number of people per household is variable but is estimated at 2.05 people per household for these calculations. All alternatives estimate 158,000 additional jobs in Seattle between 2024 and 2044.

Exhibit 1.6-31. Estimated Tons of Solid Waste (Garbage, Recycling, Compost) Generated by Alternative—Residential

Scenario	Resident estimates	Tons of Waste Per year estimate	Tons of Diversion at goal rate: 70%
Current: 2020	762,148	315,739	221,017
Alternative 1	966,358	400,338	282,336
Alternative 2	1,007,358	417,323	292,126
Alternative 3	1,007,358	417,323	292,126
Alternative 4	1,007,358	417,323	292,126
Alternative 5	1,048,358	434,308	304,015
Preferred	1,048,358	434,308	304,015

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: SPU, 2020 Annual Waste Prevention & Recycling Report; BERK, 2024~~3~~.

Exhibit 1.6-32. Estimated Tons of Waste Generated for Commercial Customers

Year	Employee Estimates	Tons per year based on 2020 per employee estimate	Diversion at current recycling rate: 61.6%	Diversion at goal recycling rate: 70%
2020 (per 2020 employee estimate)	499,146 employees	286,036 tons	176,198.2 tons	200,225.2 tons
2044 estimates, all alternatives	746,447 employees	427,751 tons	263,494.9 tons	299,426 tons

Sources: SPU, 2020 Annual Waste Prevention & Recycling Report; BERK, 2023.

To meet the additional need for solid waste services, contracts with waste haulers are renegotiated every 10 years. Fees charged to residential and commercial customers from Seattle Public Utilities and from waste haulers directly support the necessary capital investments needed to ensure minimum levels of service.

130th/145th Station Area

Alternative 1 produces a small residential growth number. The number of dwelling units would change the type of service but would not significantly impact levels of service.

Under Alternative 5, impacts to solid waste would be similar to and slightly greater than Alternative 2 with a small increase in the number of dwelling units and waste volume. Under the Preferred Alternative, impacts to solid waste would be similar to and slightly greater than Alternative 2 with a small increase in the number of dwelling units and waste volume.

Equity & Climate Vulnerability Considerations

Each service and facility type would be affected by climate change and has the opportunity to invest in more equitable services. Alternatives with greater growth have the potential to affect service delivery more than lesser growth alternatives, but all alternatives have the potential to create new investments to improve equitable services and climate resiliency.

Police Services: SPD has developed Micro Community Policing Plans (MCPP) to address the individual needs of each community. Based on the City's equity opportunity areas evaluation and engagement with the community in each area, these plans could be updated. Police access to parts of the city could be affected by extreme precipitation, flooding, sea level rise, and landslides. Alternatives with greater growth such as Alternatives 2–4 and particularly Alternative 5 and the Preferred Alternative may require greater police services and may mean additional personnel and facilities that need to be adapted for climate resilience.

Fire/Emergency Services: While the Seattle Fire Department is the main firefighting entity within Seattle, most of its work is rooted in health services and fire prevention. To reduce fires in homes SFD works with communities throughout Seattle to distribute fire prevention flyers that have been translated in the top seven spoken languages in Seattle to ensure compliance with fire safety standards regardless of language. Fire prevention outreach also helps alleviate racial and social inequities. Housing structures in the Southwest, Southeast, and East Central regions of the city are more likely to be older and to potentially benefit from fire prevention outreach. These areas are also more disadvantaged than elsewhere in the city per Seattle Racial and Social Equity Index. Targeting fire prevention outreach in these areas is vital to alleviating fire safety inequity.

Aside from outreach and prevention, SFD also performs fire inspections on existing homes as well as required inspections on new development. Each alternative will result in an increase in the number of multi-family units and may require additional staff to adequately provide fire prevention services to the growing population. Alternative 5 and the Preferred Alternative would have more demand than Alternatives 2–4 and Alternative 1.

Schools: The City's responsibility in planning for schools is to coordinate with the School District in planning for growth and modernization. Equitable access improvements would help all local students in priority areas under all alternatives.

Parks: Parks are important for community health and well-being and a key amenity in growth areas. The City developed an overlay of public space priority areas considering race and social

equity, density and growth, and health outcomes in its parks system plan. Areas of the highest priority for plans/programs/investments based on Race and Social Equity are generally in the south end of the City including Delridge (Area 6), South Park (Area 7), and Southeast Seattle (Area 8). The need for continued investment in priority areas would be similar across all alternatives.

Solid Waste: SPU has also joined with Seattle City Light to mitigate cost burden of utility services on low-income households through the Utility Discount Program. The Clean City Division of SPU also provides necessary debris clearance in the event of climate emergencies and ensure equitable distribution of resources by utilizing Seattle's Racial Equity Toolkit in program planning and implementation. This toolkit and the division ensure that public litter receptacles, litter abatement routes, and encampment solid waste collection (purple bag program) are equitably distributed throughout the city and are not prioritized in highly resourced communities. These and similar programs could support residents under all alternatives.

What are some solutions or mitigation for impacts?

All Services

- The City is updating its Comprehensive Plan, including its public services policies, and coordinating with service providers regarding growth estimates.
- Compact growth in centers under all alternatives and in other areas of focus like neighborhood centers and corridors in Alternatives 2 and 4 could result in more efficient service delivery. More diffuse growth in urban neighborhood areas in Alternatives 3 and 5 and the Preferred Alternative could distribute the demand more incrementally making use of existing infrastructure like schools, parks, and fire stations.

Parks

~~The City could explore a level of service that has a lower acres per 1,000 population or an Alternative population density-based approach given the urban nature of the city.~~

The City could add additional or improve existing park space including:

- Expanding existing parks or adding capacity on existing parks (e.g., expanded play or sports facilities),
- Creating linear parks and trails,
- Increasing tree canopy coverage in rights-of-way or public parks and open space to reduce urban heat island effects,
- Developing recreation facilities on building rooftops to provide sports courts, athletic fields, off-leash dog areas, etc.,
- Developing community gardens (permitted on some rooftops in individual zones) as a way to provide open space and urban agricultural use,
- Increasing frequency of maintenance to offset an increase in park usage.

The City could implement a parks impact fee to help pay for the development of new park land if needed in the future.

The City could also explore transportation to and from parks and potentially increase connectivity between parks in areas of high equity opportunity.

Schools

- The City could implement a school impact fee to help pay for the development of new classrooms if they are needed in the future.
- The City could help identify interim uses for existing underutilized classrooms so that the school district can hold onto them in case they are needed in the future.
- The City could incentivize provision of public schools in centers in vertical formats, where new schools are needed. The City could also allow for greater heights at existing school locations where demand increases. Goals would be to protect recreation and tree canopy while allowing for more student classroom capacity.
- The City could update development standards and review processes for new schools in order to make it easier to add classrooms or build new schools if they are needed in the future.
- As part of development standards for new place types such as neighborhood centers and corridors, the City could enhance street cross sections including walking routes to schools in areas with added housing.
- The City could identify specific objectives to assist Seattle Public Schools in acquiring and developing new schools if needed.

Police & Fire Services

- SPD could update its MCPP described under "Incorporated Plan Features" or create updated police service programs to engage the community in police services that equitably and justly meet community needs.
- SFD could explore options to decrease call times through new station placement strategies that limit East/West travel which has historically been challenging for fire units during busier times of day.
- SFD could explore smaller, more nimble fire units that are better equipped to navigate Seattle's complex topography to decrease response times while still ensuring SFD's excellent standard of service for emergency medical and fire response.
- SFD could convert peak aid units that are available at certain times to full time aid units.
- SFD could add aid units in underserved areas.

Solid Waste

- Increasing budget for education and outreach services for multi-family residents
- Establishing more significant penalties for those who do not adhere to recycling and composting standards while increasing financial benefits for households and multi-family residents who opt for recycling and compost over landfill waste disposal.
- Require specific standards in solid waste hauling contracts to protect employees from adverse health impacts of their work during extreme weather events.

130th/145th Station Area

- **All:** The 130th/145th Station Area Plan includes several strategies related to parks, education, and schools.
- **Fire/Emergency Medical Services:** If an additional aid unit is provided at each of the nearby stations at Bitter Lake and Lake City, SFD can maintain and even improve the service levels of the station area and avoiding crossing Interstate-5 at congested times of the day.

With mitigation, what is the ultimate outcome?

Police

There will be an increase in population and jobs and an increase in demand for police services. However, there are mitigation measures to invest in resources to address needs and provide adequate services.

Fire/Emergency Medical Services

It is anticipated that increased demand for fire/emergency medical services can be accommodated due the changes in staffing for fire prevention education, increased capacity at station facilities, and either redistributing or increasing the number of units at each station. Consequently, no significant unavoidable adverse impacts are to be expected.

Parks

All alternatives will exceed the existing level of service and increase demand for parks and recreation facilities. With mitigation (adding parks, making better use of existing parks, or ~~updating~~ implementing the updated parks LOS) significant adverse impacts can be avoided.

Schools

All studied alternatives would result in increases in students. This could require additional school capacity unanticipated in current district plans. However, it is anticipated that Seattle Public Schools could respond to any new growth that may occur through regular capital planning and coordination. Consequently, no significant unavoidable adverse impacts are anticipated.

Solid Waste

It is anticipated that Seattle Solid Waste will be able to accommodate expected increases in solid waste service through regular contract renegotiation and ongoing maintenance and upkeep of capital facilities. Consequently, no significant adverse impacts are anticipated.

Summary of Thresholds

Exhibit 1.6-33 summarizes potential impacts based on the evaluation in **Section 3.11 Public Services**.

Exhibit 1.6-33. Public Services Thresholds of Significance

Metric	Threshold	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref.
☒ Equity & Climate	Result in insufficient parks, open space, and trail capacity to serve expected population based on existing levels of service.[1]	▼	▼	▼	▼	▼	▼
	Create inconsistencies with shoreline public access policies.[2]	▼	▼	▼	▼	▼	▼
	Result in increases in public school enrollment that cannot be accommodated through regular school planning processes.[3]	▼	▼	▼	▼	▼	▼
	Increase demand for police or fire and emergency that can't be accommodated through regular planning and staffing processes.[4,5]	▼	▼	▼	▼	▼	▼
	Result in insufficient capacity to handle solid waste under current Seattle Public Facility plans.[6]	▼	▼	▼	▼	▼	▼

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative, and associated analysis in the notes, was added to this exhibit since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.

1 Additional park acres would be needed under each alternative if the City ~~maintains its 8.0 acres per 1,000 population level of service. The acreage needed would range from 1,312 to 1,968 acres between Alternative 1 and Alternative 5, with Alternatives 2 through 4 requiring an additional 1,640 acres.~~ The 2024 Parks and Open Space Plan's adopted level of service aims to provide parks and park facilities within a 10-minute walk of all residents. Within designated regional and urban centers, the City aims to provide parks and park facilities within a 5-minute walk of residents. Alternative 1 would have the lowest additional demand with 80,000 more dwelling units and Alternative 5 and the Preferred Alternative the greater demand at 120,000 new housing units. Within each analysis area, the population demand would be highest under the Preferred Alternative (areas 1, 3, 5) or Alternative 5 (areas 2, 6, 7, and 8). In Area 4, Downtown would have similar growth and park demand under studied alternatives, with a slightly lower population under the Preferred Alternative.

2 Greater population growth across the city could increase demand for shoreline public access. The alternatives would range in demand from the least under Alternative 1 to the most under Alternative 5 and the Preferred Alternative. Shoreline Master Program requirements for shoreline public access for non-residential development could result in more public access as development occurs in shoreline jurisdiction.

3 While K-12 public school enrollment has declined over the last 5 years, future population growth has the potential to increase student enrollment in various areas throughout the city. Seattle Public Schools monitors changes in enrollment to track expected future needs and would adjust their enrollment projections accordingly for future planning cycle. SPS would respond to the exceedance of capacity as it has done in the past by adjusting school boundaries and/or geographic zones, adding or removing portables, adding/renovating buildings, reopening closed buildings or schools, and/or pursuing future capital programs.

4 Increased density of population and jobs is anticipated to increase the potential demand for police services. The EIS analysis uses a rate of 1.8 officers per 1,000 residents, which is the average rate between 2010 and 2022. Alternative 1 would have lower growth and Alternative 5 and the Preferred Alternative the highest growth with other alternatives in the range. However, many factors can influence crime rates. Property crimes are more prevalent than violent crimes and property crimes such as robbery and motor vehicle theft tend to occur at intersections rather than in whole neighborhoods.

5 Growth in worker and residential populations in the study area is expected to lead to an increased number of calls for aid, basic and advanced life support, and other emergency services. Growth is expected to occur incrementally under all alternatives, as individual development projects are constructed.

6 Growth in residential, commercial, and self-haul solid waste is expected to increase under all alternatives. Alternative 1 would have lower growth and Alternative 5 and the Preferred Alternative the highest growth with other alternatives in the range.

1.6.12 Utilities

How did we analyze Utilities?

Utilities evaluated in this EIS include the public water system, the wastewater system, the stormwater management system, and the electrical system. A review of existing service provider plans and spatial data and contacts with service providers supported the development of the analysis.

Thresholds of significance utilized in this impact analysis include:

- Impacts that would be inconsistent with plans for future utility improvements, development, or growth.
- Impacts that would require major unplanned capital improvements for the utility to serve new developments.

What impacts did we identify?

Citywide

Seattle would experience population and job growth under all the alternatives, which would result in an increase in demand for utility services. While the alternatives have different housing targets the impacts to utilities as a result of the increased demand would be similar. Job targets are the same under each alternative.

Water: None of the alternatives are anticipated to adversely impact water supply. SPU does not have any planned efforts to increase water supply during the 20-year planning horizon for the comprehensive plan. As reported in its Official Yield Estimate and Demand Forecast, SPU forecasts that future demand will remain relatively flat well below the available water supply beyond 2060 despite anticipated population and employment growth due to continued efforts to conserve water and planned reductions in service to its wholesale water customers (SPU 2018, 2019a). SPU currently has a forecasted surplus capacity between 35 and 40 MGD. Individual housing and business developments would need to ensure adequate water supply for drinking water and fire suppression, which could require improvements or upgrades to the existing water distribution system and construction of new service connections where existing infrastructure is undersized. There could be variations in the extent to which water system infrastructure would need to be upgraded or added under each alternative depending on the age, extent, size, and condition of the existing infrastructure and the type of development being planned. For example, a greater degree of utility improvements may be required in urban neighborhood areas for multifamily development than in urban centers.

Wastewater: All alternatives would result in greater demands on wastewater and drainage collection systems through a combination of population growth, water consumption, and the amount of impervious surface as a result of new development. The amount and location of

increased demand, and any impacts as a result, would vary by alternative. Development under all the alternatives would occur in areas with wastewater and, to a lesser extent, drainage capacity constraint risks. The drainage capacity constraint risk areas are generally not concentrated within regional or urban centers and, for the most part, are outside the areas targeted for the highest concentrations of growth. While impervious surfaces from development can increase peak flows and affect conveyance capacity, these impacts could be mitigated by the City's stormwater code requirements for flow control. The West Point treatment plant is already approaching its capacity for maximum month loading (King County 2019). Treatment plant loading rates would continue to increase with population growth under all alternatives; however, the treatment plant may reach maximum month loading capacity under the action aAlternatives ~~2–5~~ sooner than it would under Alternative 1, No Action, due to their higher growth targets.

While there could be variations in the extent to which wastewater and drainage infrastructure would need to be upgraded or added under each alternative depending on the extent and location of additional population growth and development, the nature of the impact between alternatives would generally be the same.

Electricity/Power: All alternatives would result in increased demands on the electrical system due to population and job growth but are not anticipated to have adverse impacts on the electrical system. SCL currently anticipates a modest baseline demand growth of 0.5% per year between 2022 and 2032, which factors in economic growth and electrification of transportation and buildings. A rapid electrification scenario would increase demand by 32% over the baseline during that same period (SCL 2022b). While the action aAlternatives ~~2 through 5~~ target greater household increases than factored into SCL's Electrification Assessment, population growth is less of a consideration for load capacity than electrification of transportation and building systems. For either scenario, SCL will seek to increase energy supply through sustainable and resilient energy resources such as wind and solar while implementing customer demand management and energy efficiency programs (SCL 2022b).

As with the other utilities, development would need to connect to the city's power grid. This could require minor improvements or upgrades to existing electrical infrastructure and construction of new service connections where existing infrastructure is undersized or nonexistent. While there could be variations in the extent to which electrical infrastructure would need to be upgraded or added under each alternative, the nature of the impact between alternatives would be the same.

130th/145th Station Area

Impacts to water, wastewater, and electricity would be the same as described for the citywide evaluation. The 130th/145th Station area is within the Thornton Creek watershed and partially within the Densmore stormwater basin, which is capacity constrained, and includes many blocks with an informal drainage system, including some ditch and culvert systems. Increases in impervious surface due to new development could increase peak flows and potentially affect conveyance capacity. Development in this area would be subject to more stringent stormwater management requirements to avoid adversely affecting conveyance capacity and to protect

water quality. These requirements could include flow control and treatment or the construction of formal stormwater drainage facilities if none are present.

What is different between the Alternatives?

Citywide

As the City has been planning for and directing growth to centers and villages designated in the Seattle 2035 plan, there would be no adverse impacts to utilities. Alternative 2 would result in areas of infrastructure improvements through a greater portion of the city than in Alternative 1, but in a more focused manner than Alternatives 3 and 4.

While there is ample capacity to accommodate growth in the near term for all utilities, the addition of 40,000 more housing units under Alternative 5 and the Preferred Alternative within the planning period would likely exacerbate service constraints during peak periods for wastewater and stormwater without improvements to existing systems.

Under all alternatives, development would require improvements and upgrades to existing utilities and construction of new facilities to accommodate the increased density, which could offset the impact of increased growth through upsizing of service lines and on site or green stormwater infrastructure.

Equity & Climate Vulnerability

Utility infrastructure is vulnerable to the impacts of climate change in a variety of ways such as sea level rise, extreme heat, flooding due to extreme precipitation, and others.

Drainage and Power: Utility infrastructure is vulnerable to the impacts of climate change in a variety of ways such as sea level rise, extreme heat, flooding due to extreme precipitation, and others.

- **Sewer/Drainage**: The City's wastewater and drainage systems are vulnerable to sea level rise that could inundate conveyance pipes and facilities, particularly those facilities that lie within the 100-year floodplain. More frequent and extreme storm events can damage transmission lines and cause power outages.
- **Power:** Seattle's electrical power relies on hydroelectric sources, which rely on water supplies vulnerable to reduced winter snowpacks and drought. More frequent and extreme storm events can damage transmission lines and cause power outages.

Areas 7 and 8 in particular have vulnerable populations and are more susceptible to climate change impacts such as flooding and heat island effects.

- Alternative 1 plans for 8,500 households to Areas 7 and 8, primarily to existing urban centers in Area 8.
- Alternative 5 adds approximately 17,500 households in Areas 7 and 8, primarily in regional center and urban neighborhood areas in Area 8.

- Alternatives 2 through 4 and the Preferred Alternative are in this range.

Growth in these areas may require a greater degree of investment in improved drainage and electrical utilities to overcome these vulnerabilities.

130th/145th Station Area

Alternative 2 would lead to greater demand on utilities than Alternative 1 with the designation of several neighborhood centers in the area, as would ~~and particularly~~ Alternative 5 and the Preferred Alternative, ~~with an~~which designate an urban center on both sides of I-5 in addition to the neighborhood center around the 145th Street station. ~~would lead to greater demand on utilities than under Alternative 1, along with a~~This would provide greater opportunity for utility improvements within the area, particularly related to stormwater management in an area designated as capacity constrained.

~~Under Alternative 5 w~~While new development under Alternative 5 and the Preferred Alternative ~~has~~ would have the benefit of improving utility infrastructure, this development would occur within a capacity constrained stormwater basin, which may be a constraint on the extent of new development and resulting increase in impervious surface if stormwater cannot be managed on site or through improved conveyance infrastructure.

What are some solutions or mitigation for impacts?

Citywide

A number of regulations apply to new development to ensure adequate utilities.

The Comprehensive Plan includes a Utilities Element that lists policies and goals to ensure safe, reliable, and equitable service and growth throughout the city; protect water quality; and encouraging energy efficiency and renewable resources.

King County, SPU, and SCL regularly plan and adapt to changing growth patterns and are currently engaged in efforts to improve wastewater and stormwater capacity, reduce water and electrical demand, and increase the resiliency of their utility systems against the impacts of climate change. City codes regulating construction and utilities will continue to ensure new development addresses any service or capacity constraints.

While each alternative has the potential to impact utilities through increased demand, none of these impacts are identified as significant adverse impacts. King County, SPU, and SCL regularly plan and adapt to changing growth patterns and are currently engaged in efforts to improve wastewater and drainage system capacity, reduce water consumption and electrical demand, and increase the resiliency of their utility systems against the impacts of climate change. City codes regulating construction and future utility investments will continue to ensure new development addresses any service or capacity constraints. See **Section 3.12.3**.

130th/145th Station Area

See citywide.

With mitigation, what is the ultimate outcome?

No significant unavoidable adverse impacts to utilities are anticipated under any of the alternatives as a result of the City's Comprehensive Plan update. Population and job growth under all alternatives would increase demand on the City's water, wastewater, drainage, and electrical systems and, for the action alternatives, exceed the planned growth anticipated in the utilities' planning forecasts. However, the utilities are anticipated to accommodate this growth through a combination of existing and future anticipated supply, demand management, and upgrades to existing infrastructure and facilities to improve capacity, operation, and reliability.

In areas considered capacity constrained for stormwater runoff, such as those areas with informal ditch and culvert systems, development would be subject to more stringent stormwater management requirements to avoid adversely affecting conveyance capacity and protect water quality. These requirements could require construction of formal drainage facilities to treat and manage the flow of stormwater as well~~There would be no significant unavoidable adverse impacts to utilities under any of the Alternatives. Services generally have capacity to serve, and where there are deficiencies in current infrastructure, there are plans and regulations to ensure that there is proper connection and sizing.~~

Summary of Thresholds

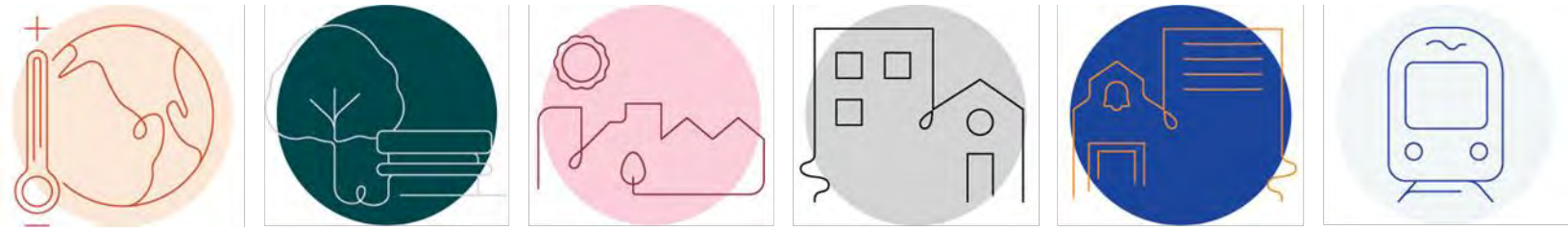
Exhibit 1.6-34 summarizes potential impacts based on the evaluation in **Section 3.12 Utilities**.

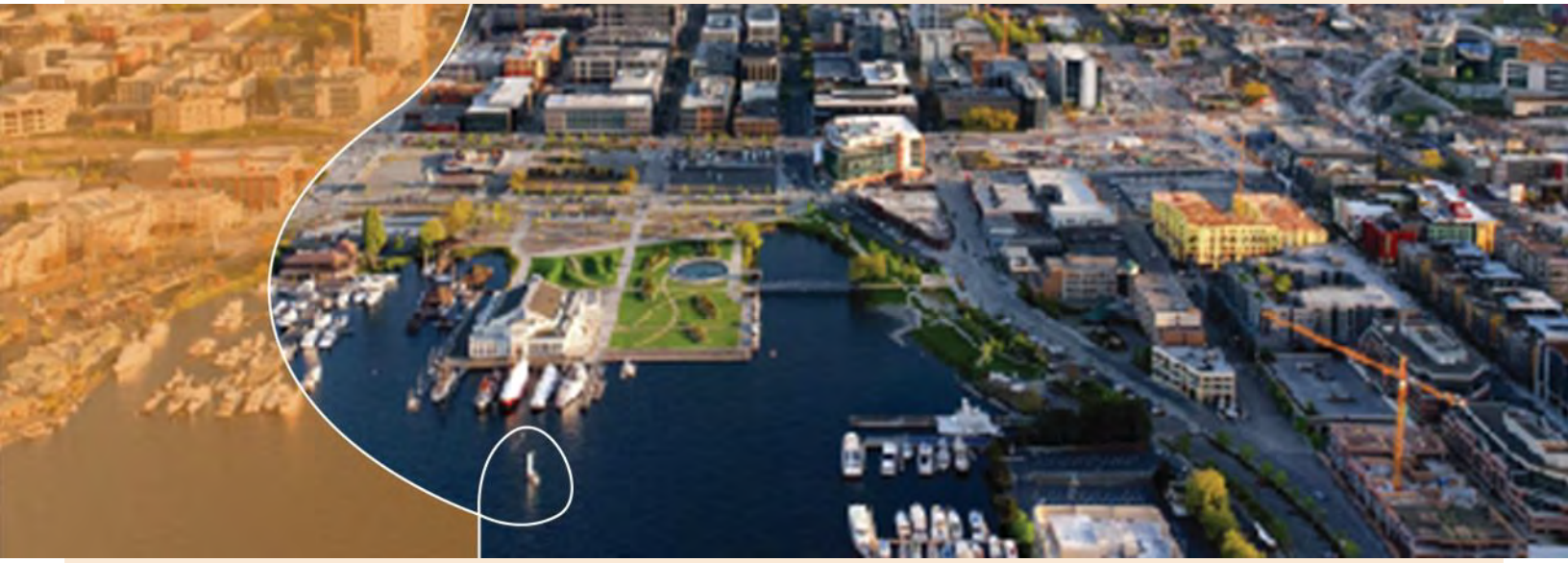
Exhibit 1.6-34. Utilities Impact Thresholds and Alternative Comparison

Metric	Threshold	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Pref.
	Impacts that would be inconsistent with plans for future utility improvements, development, or growth.[1]	▽	▽	▽	▽	▽	▽
	Impacts that would require major unplanned capital improvements for the utility to serve new development.[1]	▽	▽	▽	▽	▽	▽

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative was added to this exhibit since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.
1 Seattle would experience population and job growth under all the alternatives, which would result in an increase in demand for utility services. Service providers for water, wastewater, drainage, and power regularly plan and identify improvements to ensure wastewater and drainage system capacity, reduce water consumption and electrical demand, and increase the resiliency of their utility systems against the impacts of climate change.

2 PROPOSAL & ALTERNATIVES





Source: City of Seattle, 2023.

2.1 Introduction

This Chapter of the EIS describes the One Seattle Comprehensive Plan Update proposal and alternatives.

2.1.1 Overview of the Proposal

Seattle's Comprehensive Plan is the vision for how Seattle grows and makes investments. The Plan's goals and policies and land use plan guide decisions about where the City should expect and support new housing and jobs, and where the City invests in transportation, utilities, parks, and other public assets. The Plan must be updated by 2024 to address state and regional goals and requirements with implementing regulations regarding middle housing due by 2025. The Plan will also address racial inequities, housing costs, access to economic opportunity and education, and climate change. As part of the One Seattle Plan Update, the City will consider updates to zoning and development regulations to implement the Plan. ~~Draft~~ EIS alternatives vary levels, types, and locations of growth and investment. ~~Five~~ Six alternatives are described further in **Section 2.4** below:

- **Alternative 1: No Action**—The No Action Alternative is required under the State Environmental Policy Act (SEPA). It would continue implementation of the current Seattle 2035 Comprehensive Plan. The No Action Alternative for the One Seattle Plan maintains the status quo of focusing most housing and jobs within existing urban centers and villages with no change to land use patterns. It also incorporates changes proposed as part of the recent Industrial and Maritime Strategy EIS. It would meet regionally set growth targets including 80,000 new homes and 158,000 jobs for the period 2024-2044.
- **Alternative 2: Focused**—Alternative 2 includes the creation of additional areas of focused growth called neighborhood centers to create more housing around shops and services. Neighborhood centers would be similar to existing urban villages in that they would allow a wide range of housing types and commercial space, but with a smaller geographic size and lower intensity of allowed development. This alternative would result in a greater range of housing options with amenities and services in many neighborhoods. For the period 2024-2044, Alternative 2 includes more housing than Alternative 1 at 100,000 new homes. Eighty thousand homes would be located in a similar distribution to Alternative 1, with the 20,000 additional homes accommodated in neighborhood centers. Like Alternative 1, Alternative 2 includes 158,000 new jobs, but their distribution would vary. Compared to Alternative 1, about 15% of new jobs in Alternative 2 and the other action alternatives are assumed to be located in proportion to the location of new housing. This assumption accounts for the desire of businesses like local retail, restaurants, and services to locate near housing.
- **Alternative 3: Broad**—Alternative 3 allows a wider range of low-scale housing options, like triplexes and fourplexes, in all Neighborhood Residential zones as part of the urban neighborhood place type. Alternative 3 proposes a total housing growth of 100,000 housing units (20,000 more than Alternative 1) to account for the potential additional housing demand that could be met with broad zoning changes. Eighty thousand units would be

Place Types

See **Exhibit 2.1-1**.

- **Regional Centers** are regionally designated places with a diverse mix of uses, housing, and employment. They include several centers that comprise greater Downtown along with the University District and Northgate. These contain Seattle's densest neighborhoods and a large share of the city's jobs.
- **Urban Centers** are dense, walkable, mixed-use places with a wide range of housing and businesses located near transit, amenities, and jobs.
- **Neighborhood Centers** are 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.
- **Corridors** are areas near frequent transit and large parks that allow a wide range of housing types in areas currently zoned primarily for detached homes (within a 10-minute walk from a light rail station and a five-minute walk from frequent bus transit service and entrances to large parks). Corridors also include areas already zoned for multifamily and commercial use and could have small increases in height.
- **Urban Neighborhoods** represent low-scale primarily residential areas. This place type would primarily allow housing types within a three-story scale, such as detached homes, duplexes, triplexes, fourplexes, and stacked flats. This place type would allow flexibility for new forms of housing in areas currently zoned primarily for detached homes.
- **Manufacturing and Industrial Centers** are regionally designated industrial job centers. The One Seattle Plan process would not change the boundaries of these centers nor the goals and policies for these areas, which were recently updated as part of the Industrial and Maritime Strategy.

located in a similar distribution to Alternative 1, with the 20,000 additional homes accommodated in new housing types in Neighborhood Residential zones. Job growth would be the same as Alternative 1, but 15% of jobs would be located near new housing.

- **Alternative 4: Corridor**—Alternative 4 allows a wider range of housing options only in corridors to focus growth near transit and amenities. This alternative would increase production of both ownership and rental housing options in various neighborhoods and support City and regional investment in transit. Eighty thousand units would be located in a similar distribution to Alternative 1, with 20,000 additional homes accommodated in new housing types in the corridors, for a total of 100,000 new homes. Job growth would be the same as Alternative 1, but 15% of new jobs would be located near new housing to provide local shopping and services.
- **Alternative 5: Combined**—Alternative 5 contemplates the largest increase in supply and diversity of housing across Seattle. It includes the strategies for encouraging housing growth in Alternatives 2, 3, and 4 plus additional changes to existing urban center and village boundaries and changes to new place type designations. Alternative 5 assumes 120,000 new housing units (40,000 more than Alternative 1) to account for the potential additional housing demand that could be met within the areas of change identified in Alternatives 2, 3, and 4 as well as changes to existing and new centers and villages. Eighty thousand units would be located in a similar distribution to Alternative 1, with the additional 40,000 units accommodated multiple areas of change. Job growth would be the same as Alternative 1. The distribution of jobs and housing would be a combination of the other alternatives.

- **Preferred Alternative: Mayor's Recommended Plan**—the Preferred Alternative includes the Mayor's Recommended Growth Strategy reflected in the proposed One Seattle Comprehensive Plan and the One Seattle Zoning Update. These plans and implementing zoning consider the public comment during the Draft EIS and Draft Plan comment periods and public engagement opportunities. Growth is proposed similar to Alternative 5 totals at 120,000 new dwellings (40,000 more than Alternative 1) and the same jobs of 158,000 jobs for the period 2024-2044.

In addition to reviewing conditions and impacts citywide, this EIS also provides a focused review of the 130th and 145th Street Station Area Plan and options for the City to streamline future environmental review in that area, which may include a planned action (RCW 43.21c.440), infill exemption (RCW 43.21C.229), or other tools available under state legislation (e.g., SB 5818).

Place Types

The City is developing a growth strategy and draft plan in parallel with the ~~Draft~~ EIS. The City anticipates renaming place types adopted in the current Seattle 2035 Comprehensive Plan. Text, tables, and maps addressing existing conditions or Alternative 1 use the City's adopted place type names as listed in the existing Seattle 2035 plan. For Alternatives 2, 3, 4, and 5, the new place type names are used. See **Exhibit 2.1-1**.

Exhibit 2.1-1. Place Type Names

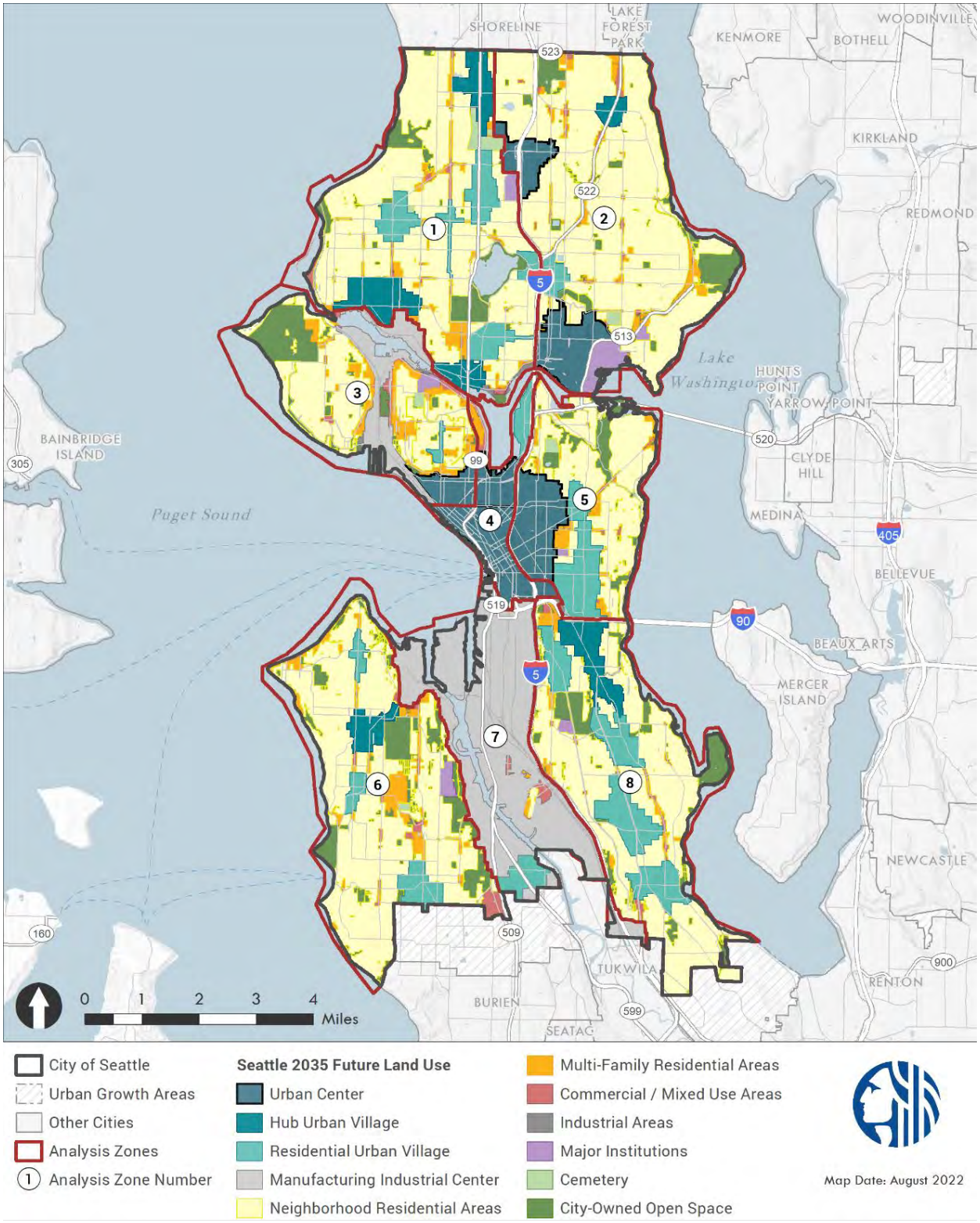
Alternative 1, No Action, (Seattle 2035) Place Type Names	Place Type Name in EIS Scoping Documents 2022	Alternatives 2, 3, 4, and 5 Place Type Names in ~~Draft~~ EIS	Preferred Alternative
Urban Center	Urban Center	Regional Center	Regional Center - Metro Regional Center - Urban
Hub Urban Villages Residential Urban Villages	Urban Village	Urban Center	Urban Center
(new place type)	Neighborhood Anchor	Neighborhood Center	Neighborhood Center
(new place type)	Corridors	Corridors	Urban Neighborhood - Frequent Transit Corridor
(new place type)	Neighborhood Residential	Urban Neighborhood	Urban Neighborhood - Neighborhood Residential Urban Neighborhood - Other Multifamily
Manufacturing & Industrial Center	Manufacturing & Industrial Center	Manufacturing & Industrial Center	Manufacturing-Industrial Center

Source: City of Seattle, 2023 and 2024.

2.1.2 Study Area

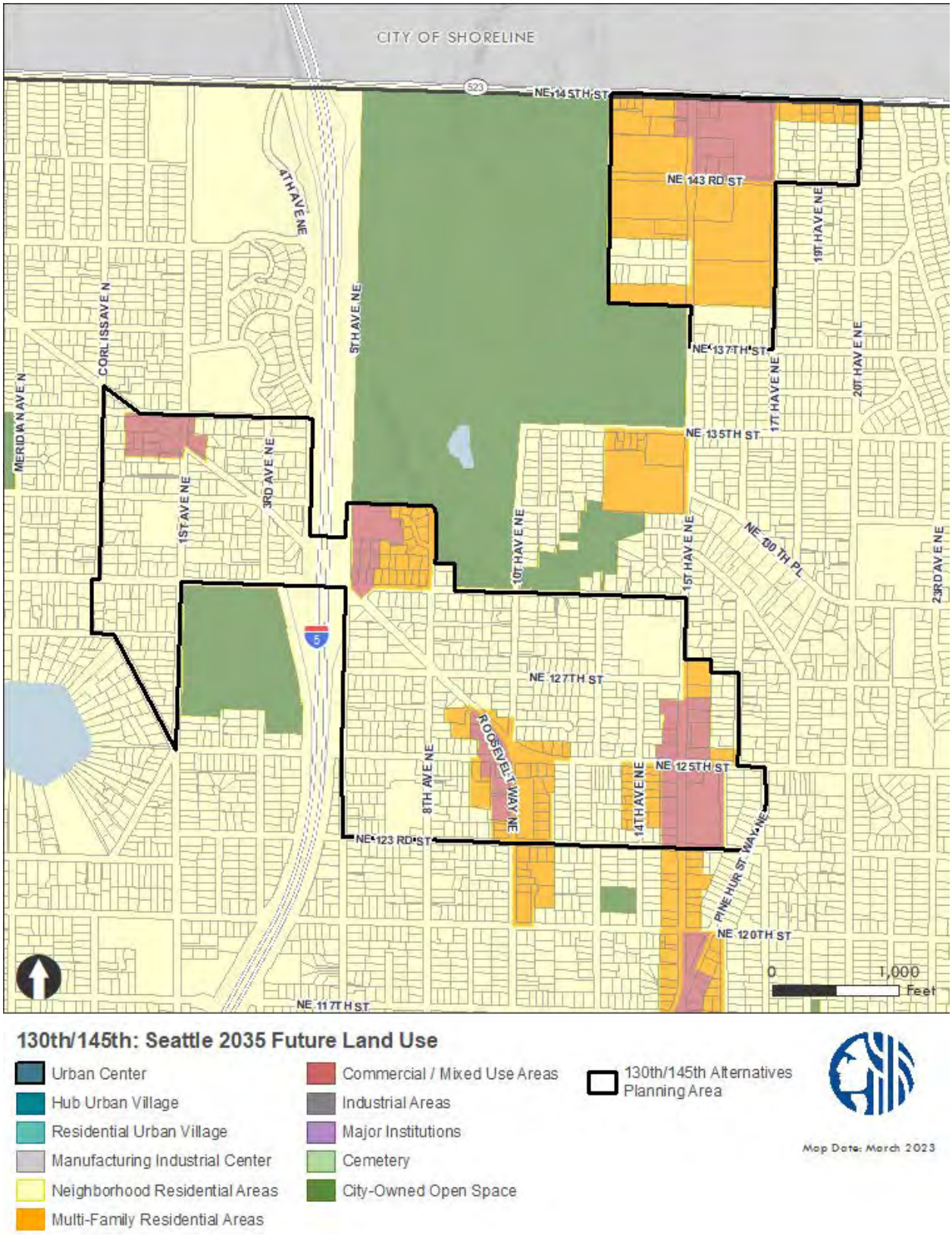
The study area includes the full city limits. The city has been divided into regions based on road and natural features to organize the EIS evaluation and results. See **Exhibit 2.1-2**. A subarea is reviewed in greater detail at the 130th and 145th Station Area as a result of a station area planning process ongoing since 2019. See **Exhibit 2.1-3**.

Exhibit 2.1-2. Study Area



Note: See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Sources: City of Seattle, 2022; BERK, 2022.

Exhibit 2.1-3. 130th/145th Subarea



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

2.1.3 Objectives of the Proposal

SEPA requires a statement of the proposal's objectives and the purpose and need to which the proposal for the Comprehensive Plan Update is responding. Alternatives are different means of achieving the proposal's objectives.

The objectives of the update include:

- 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.
- Livability: Foster complete neighborhoods where more people can walk or bike to everyday destinations such as local shops, parks, transit, cultural amenities, and services.
- Affordability: Increase the supply of housing to ease increasing housing prices caused by competition for limited supply and create more opportunities for income-restricted affordable housing.
- Inclusivity:
  - Increase diversity of housing options in neighborhoods throughout Seattle to address exclusivity and allow more people to live and stay in a variety of neighborhoods.
  - Reduce residential displacement and support existing residents, particularly low-income households, who are struggling to stay in their neighborhoods.
- Climate resiliency: Reduce emissions from buildings and transportation and promote adaptations to make our city more capable of withstanding the impacts of climate change.
- Consistency with other plans and policies: Meet state and regional policies and requirements for the Comprehensive Plan Update including but not limited to growth and housing affordability targets.

In addition to the citywide objectives, the objectives for 130th and 145th Station Area are contained in the vision statement in the "130th & 145th Station Area Planning Plan for Public Review," July 2022:

> *The 130th and 145th Station Area is a lively, walkable, and welcoming North Seattle neighborhood. Major streets have roomy, tree-lined sidewalks, and other green infrastructure. Bicycle infrastructure makes everyday trips to transit stations, schools, and neighboring urban villages enjoyable and safe. An array of housing offers options affordable to a broad range of incomes and lifestyles. Small shops and cafes near the station cater to locals, commuters, students, and visitors. Local and citywide lovers of nature, recreation and culture treasure the abundant greenspaces and unique cultural events so easily reached by walking, biking, or transit.*

2.2 Planning Context & Outreach

2.2.1 Seattle Comprehensive Plan

The Seattle Comprehensive Plan, *Seattle 2035*, is a 20-year vision and roadmap for Seattle's future. The plan guides City decisions on where to build new jobs and houses, how to align growth with the transportation system, and where to make capital investments such as utilities, sidewalks, and libraries. Seattle 2035 is the framework for most of Seattle's big-picture decisions on how to grow while preserving and improving the city's neighborhoods.

The Comprehensive Plan was first adopted in 1994 consistent with the Washington State Growth Management Act (GMA). Less extensive revisions and updates are incorporated on an annual basis and major "periodic reviews" were completed in 2004 and 2016. The One Seattle Comprehensive Plan Update is the next major periodic review.

Volume 1 of the Seattle 2035 Comprehensive Plan consists of fourteen major elements, all of which will be reviewed and updated as part of the proposal:

1. Growth Strategy (Urban Village) Element
2. Land Use Element
3. Transportation Element
4. Housing Element
5. Capital Facilities Element
6. Utilities Element
7. Economic Development Element
8. Environment Element
9. Parks and Open Space Element
10. Arts and Culture Element
11. Community Well-Being Element
12. Community Engagement Element
13. Container Port Element
14. Shoreline Element

The four core values of Seattle's Comprehensive Plan are:

- **Race and Social Equity**—limited resources and opportunities must be shared; and the inclusion of under-represented communities in decision-making processes is necessary
- **Environmental Stewardship**—protect and improve the quality of our global and local natural environment.
- **Community**—developing strong connections between a diverse range of people and places.
- **Economic Opportunity and Security**—a strong economy and a pathway to employment is fundamental to maintaining our quality of life.

Volume 2 of the Comprehensive Plan consists of the City's 38 adopted neighborhood plans.

Urban Village Strategy

The urban village strategy is the foundation of Seattle's existing Comprehensive Plan. It is the City's unique approach to meeting the state GMA requirement and resembles VISION 2050's growth centers approach. This strategy concentrates most of the city's expected future growth in specific designated areas. The City has designated four place types with distinct functions and varying amounts and intensity of growth and mixes of land uses:

1. **Urban centers** are the densest Seattle neighborhoods. They act as both regional centers and local neighborhoods that offer a diverse mix of uses, housing, and employment opportunities.
2. **Hub urban villages** are communities that offer a balance of housing and employment but are generally less dense than urban centers. These areas provide a mix of goods, services, and employment for their residents and surrounding neighborhoods.
3. **Residential urban villages** are areas of residential development, generally at lower densities than urban centers or hub urban villages. While they are also sources of goods and services for residents and surrounding communities, for the most part they do not offer many employment opportunities.
4. **Manufacturing/industrial centers (MICs)** are home to the city's thriving industrial businesses. Like urban centers, they are important regional resources for retaining and attracting jobs and for maintaining a diversified economy.

The City is considering renaming the center names and adding others in the alternatives. See **Exhibit 2.1-1**.

Community Planning

The Growth Management Act allows for subarea plans that study smaller areas than the city as a whole to evaluate local conditions. In the past, the City has prepared neighborhood plans and adopted portions into the Comprehensive Plan.

According to Puget Sound Regional Council (PSRC) regional center requirements and VISION 2050, by 2025 the City must prepare a subarea plan for each designated regional growth center and manufacturing industrial center, including:

- Downtown
- First Hill/Capitol Hill
- Northgate
- South Lake Union
- University Community
- Uptown
- Greater Duwamish Manufacturing Industrial Center
- Ballard–Interbay Manufacturing Industrial Center

Adopted in July 2022, the *130th and 145th Station Area Plan* outlines the community's and City's concepts for land use, mobility and other policies and investments to support a regional transit investment at both locations (light rail station and bus rapid transit station, respectively). The planning process has been ongoing for several years at the time of this writing. Based on a Washington Department of Commerce grant to facilitate facilitated environmental review, this EIS addresses the subarea plan and implementing zoning alternatives (described in **Section 2.2.3 130th/145th Station Area Plan**).

The City has policies guiding the preparation of new or amended community plans in collaboration with community members, and to help allocate available resources, currently in the Community Involvement chapter of Seattle 2035 Comprehensive Plan.

Future Land Use & Existing Zoning

The City of Seattle's Future Land Use Map (FLUM) is part of the Comprehensive Plan and expresses spatially the 20-year vision of preferred land use patterns to guide development within the city. The existing FLUM identifies urban centers, hub urban villages, residential urban villages, and manufacturing/industrial centers as well as four other land use types—neighborhood residential areas, multifamily residential areas, commercial/mixed-use areas, and industrial areas—that suggest specific uses outside centers and villages. The FLUM also designates major institutions, cemeteries, and City-owned open space.

The future land use designations are implemented by a corresponding range of zoning districts and development regulations established in Title 23 of the Seattle Municipal Code (SMC). Each land use area may include different levels of zoning that provide more detail about what can be built. Zoning in Seattle is broadly categorized into the following major classifications:

- Neighborhood Residential
- Multifamily residential
- Commercial
- Industrial
- Seattle Mixed
- Downtown

Zoning overlays also exist in certain locations, such as around major institutions and in master planned communities. Property in an overlay district is subject to both its zone classification regulations and additional requirements of the overlay district, which supersede any conflicting provisions of the underlying zone.

2.2.2 Equity & Climate Vulnerability

The City seeks to develop a plan that results in more equitable outcomes, reduces harms, and supports community-wide benefits created by growth and investment. This section describes some of the equity and climate work that informed our review of the alternatives. **Section 1.6** summarizes findings of the alternatives and their relationship to equity and climate vulnerability.

Definitions

- **Race and Social Equity:** when all marginalized people can attain those resources, opportunities, and outcomes that improve their quality of life and enable them to reach their full potential. The city has a collective responsibility to address the history of inequities in existing systems and their ongoing impacts in Seattle communities, leveraging collective resources to create communities of opportunity for everyone, regardless of race or means. (Seattle Resolution 31577).
- **Equity:** Everyone has fair and unbiased access to the resources they need to meet their fundamental needs and fully participate in the life of their community. (Seattle 2035).
- **Displacement:** The relocation of residents, businesses, or institutions from an area due to the burdens placed on them by the rising cost of housing or commercial space.
- **Climate Vulnerability:** The propensity or predisposition of people, resources, ecosystems, infrastructure, and services to be adversely affected by climate stressors/hazards. Vulnerability encompasses exposure, sensitivity, potential impacts, and adaptive capacity. (US Climate Resilience Toolkit, 2022)
- **Objective:** A description of the City's intent or desired result.
- **Performance Metric:** Measurable data or qualitative information used to track objectives.

PolicyLink Racial Equity Analysis

Prior to the start of the One Seattle Plan process, the City worked with the organization PolicyLink to conduct a racial equity analysis of the current Comprehensive Plan. This work highlighted persistent racial disparities in Seattle related to housing, neighborhood access, and economic prosperity. The work raised concerns that our existing growth strategy is reinforcing a pattern of racial segregation and exclusion and identified numerous policies and tools that the City could consider addressing existing disparities. The alternatives considered in this EIS are meant to address some of these concerns by increasing the supply and diversity of housing in neighborhoods throughout Seattle.

Climate Change

The city is experiencing the impacts of climate change including extreme heat, smoky air from wildfires, sea-level rise, and extreme precipitation and flooding. Seattle created a climate action plan in 2011 and adopted a goal for the community to become carbon neutral by 2050. The City is not on track to meet all goals to reduce carbon pollution, and more coordination and action is needed. The Seattle Climate Action Plan, adopted in 2013, and the Seattle Climate Strategy, released in 2018, establish short- and long-term actions for addressing climate change.

Equity & Environment Agenda

The City of Seattle is committed to environmental justice for people of color, low-income households, and others disparately affected by historic decisions on land use and infrastructure that affect housing, health, and other aspects of quality of life. The City has created an Environmental Justice Committee that developed an Equity and Environment Agenda with the following vision:

> *We are steadfast in our pursuit of Environmental Justice, redefining our environment as not just the natural environment, but also where we work, worship, play, learn and live. We believe in a world that respects communities' histories and cultures, and that uplifts self-determination and full participation. We know that communities of color are creative, resourceful, and resilient, and deeply care about the environments in which they live. Given that, we believe in environmental solutions that connect to and create economic and educational opportunities so that all communities can thrive. To do this necessitates addressing past systemic injustice while creating proactive, transformational solutions for the future.*

The Equity and Environment Agenda is also based on the following principles:

> *Community Driven Strategies: We believe in community self-determination, influence, and leadership. We know that communities are resilient and resourceful, and that tapping into their own collective cultural cornerstones of environmental sustainability is key to ownership of initiatives and other efforts, as well as reducing invisibility.*
>
> *The Influence and Decision-Making of Those Most Affected: We believe that communities who are deeply affected by environmental issues should be highly involved throughout decision-making processes in meaningful and culturally appropriate ways.*
>
> *Strong Accountability: We believe that affected communities deserve strong, accountable, transparent, accessible, and culturally appropriate solutions that include ongoing oversight of government and other entities to address the negative impacts they have experiences.*
>
> *Solutions That Recognize Complexity and Interdependence: We believe in doing no harm, here or anywhere. We recognize that all places and people are interconnected, and commit to an approach of collective liberation, which recognizes that the liberation of each person is the liberation of all people.*

Section 3.6 Land Use Patterns & Urban Form includes an overview of past land use policies and other previous actions that had inequitable outcomes.

2.2.3 130th/145th Station Area Plan

Adopted in 2022, the *130th and 145th Station Area Plan* outlines the community's and City's concepts for land use, mobility, and other policies and investments to support a regional vision for integrating fast and reliable transit with compact walkable communities. The Plan is intended to guide decisions for public and private investment near these high-capacity transit stations. Topics addressed in the plan include land use, mobility, housing, open space, and other community needs. Goals, strategies, and early actions included in the Plan are guided by the following vision:

> *The 130th and 145th Station Area is a lively, walkable, and welcoming North Seattle neighborhood. Major streets have roomy, tree-lined sidewalks, and other green infrastructure. Bicycle infrastructure makes everyday trips to transit stations, schools, and neighboring urban villages enjoyable and safe. An array of housing offers options affordable to a broad range of incomes and lifestyles. Small shops and cafes near the station cater to locals, commuters, students, and visitors. Local and citywide lovers of nature, recreation and culture treasure the abundant greenspaces and unique cultural events so easily reached by walking, biking, or transit.*

The station area in the *130th and 145th Station Area Plan* includes the area within a half-mile (about a 10-minute walk) of the 130th and 145th Link stations, and within a quarter-mile (about a 5-minute walk) of the NE 145th St/15th Ave NE Stride bus rapid transit (BRT) station. The Plan also considers a larger study area that includes communities that can access the stations by a longer walk or a short bike or bus ride.

2.2.4 Public Outreach

Community engagement for the Comprehensive Plan Update is occurring over four phases:

1. Listen & Learn: Winter & Spring 2022
2. Shape the Plan: Summer 2022 – Fall 2023
3. Review & Refine: Fall 2023 – Fall 2024
4. Adopt and Look Ahead: Fall 2024 – 2025

Each phase has distinct objectives and activities that are planned to engage community members and key stakeholders in identifying issues, developing policy concepts, and shaping the final recommended plan that will be considered by the City Council in 2024.

As part of this process. additional engagement will inform legislation that will make changes to zoning and development standards necessary to implement the Comprehensive Plan.

The engagement process is a citywide effort to engage with a wide and inclusive range of communities, including residents, neighborhood and community groups, cultural organizations, businesses, advocacy organizations, and other public and private agencies. The City recognizes that Seattle's many issue- and community-based groups represent an existing knowledge base

around both the technical aspects and quality of life implications of the Plan Update. The City seeks to build upon and foster relationships with a diversity of groups in order to gain feedback and insights on the Plan's policies and issue areas. In addition, the City is focusing community engagement resources on centering race and equity in the One Seattle engagement process in keeping with the Equitable Community Engagement Ethos. Engagement efforts are targeted to uplift the voices of people and communities who have been historically and systematically excluded from policy decision making. This equity-driven focus includes BIPOC communities, low-income populations, renters, limited-English populations, people experiencing homelessness, youth, elders, the LGBTQ+ community, and other historically underserved communities.

Phase 1 Engagement

During Phase 1, the City began implementing three key engagement strategies:

- **Online engagement strategies designed to reach more people than in-person engagement alone, lowering barriers to engagement and encouraging participation across the city and beyond.** Online engagement included the One Seattle Plan Project Website (viewed 4,972 times from January to June of 2022); 54,954 impressions via OPCD's Twitter and Facebook; media coverage; and launching the One Seattle Plan Engagement Hub. As of the Phase 1 Engagement Report, OPCD had received 10,243 feedback comments relating to the One Seattle Plan through the Engagement Hub, and the page had been viewed 6,447 times.
- **Collaborative engagement partnerships with community-based organizations and Community Liaisons.** OPCD partnered with five community-based organizations to help design and carry out public engagement strategies for the update. Each organization worked with OPCD to create and refine a unique engagement workplan that centers the voices, needs, and visions of the BIPOC communities they serve and whom have been historically underrepresented in City planning and engagement processes. The five organizations are the Asian Pacific American Labor Alliance (APALA), the Capitol Hill Eco District, Duwamish Valley Sustainability Association / Duwamish Valley Youth Vision Project, Estelita's Library, and Khmer Community of Seattle/King County / Noio Pathways/ KIMYUNITY. Each community-based organizations were compensated for their work through 12-month contracts at $30,000 each. In partnership with the Department of Neighborhoods, OPCD also contracted with a cohort of ten Community Liaisons to develop and carry out broad and deep engagement to amplify the voices of key underrepresented communities. OPCD's community liaison cohort is collectively conversant in Somali, Amharic, Oromo, Vietnamese, Chinese (Mandarin), Cham, and Spanish and has worked to engage with populations speaking these languages as well as with African American, Indigenous, Latinx, older adults, people with disabilities, and unhoused people across Seattle.
- **Leveraging existing City relationships and coordinated with outreach to key stakeholders.** Over the course of Phase 1, OPCD presented to City Council three times and attended and presented to both liaisons and full board meetings of 21 Boards and

Commissions. OPCD also met periodically with the Equitable Development Initiative (EDI) Advisory Board to obtain feedback on key elements of the One Seattle Plan and worked with the Indigenous Seattle Workgroup to ensure that our engagement is also specifically tailored to the indigenous community.

The City heard from 2,348 individuals in the Phase 1 Survey and through the 1,001 registered users of the Engagement Hub. In the Phase 1 Survey, the subjects identified as being the highest priority for being addressed in the One Seattle Plan were: **housing availability and affordability, transportation and mobility, climate change**, and **racial and social equity**. The prioritization of these top three elements—Housing, Transportation, and Climate Change, in this order, remained the same across categories of race/ethnicity, homeownership, age, and gender. The next three most frequently discussed Plan elements were economic development, parks and open space, and community well-being.

The vast majority of feedback about Seattle's need for new housing focused on the critical need for more affordable housing. Respondents also desire varied housing choices (duplexes, triplexes, and fourplexes; two and three-bedroom apartments; and condominiums and co-ops to provide ownership opportunities) and increased density in and around urban villages, other activity centers, and major amenities. Transportation comments focused on expanded public transit and improving alternative transportation (biking, rolling, and walking) safety, convenience, and access. The two biggest climate threats identified by commenters were air quality and extreme temperatures. Respondents frequently cited air pollution, wildfire smoke, hot and cold weather changes, and the related health implications in communities, particularly among those communities most vulnerable to these extreme shifts. Other climate concerns included water-related climate threats (rain, droughts, heavy rain/flooding, water scarcity, sea-level rise, water table rise, ocean acidification, and water pollution) and concerns about trees and green space (specifically loss of tree canopy).

Around 25% of respondents identified as BIPOC and 75% identified as White (compared to Seattle's BIPOC population of around 33%). While the City heard from a smaller percentage of BIPOC respondents than we would have liked in Phase 1, the comments received from BIPOC respondents tended to mirror those of White respondents in terms of the priorities they wished to see represented in the One Seattle Plan. Comments about equity envisioned equitable access to resources like parks and green spaces, community centers, medical facilities, grocery stores, libraries, and schools. Comments about race touched on improved equity for BIPOC community members—specifically around income, wealth and generational wealth, housing, and gentrification and displacement concerns—and comments about the need to address climate-vulnerable populations mentioned the need for equitable, environmentally just investments.

See the Phase 1 Engagement Report for a more detailed summary of engagement efforts, partners, and feedback.

Phase 2 Engagement

Between November 2022 and January 2023, OPCD engaged community members around the Comprehensive Plan Update by continuing the strategies in Phase 1 and also hosting a series of five in-person community meeting. The meetings took place in neighborhoods across Seattle. Each meeting started with a half-hour open house where participants were encouraged to review poster boards with information on various topics, discuss questions about each element of the Plan with OPCD and related City staff (OSE, SPR, and SDOT), and use sticky notes to provide written responses to question prompts on each element's poster. Attendees then divided themselves into small groups of 8-14 people. Each group was paired with a staff facilitator and staff notetaker and then engaged in two 40-minute community conversations focused on two topics: 1) access to housing options, and 2) creating complete communities.

In Spring 2023 the City shared summaries of engagement through partnerships with seven Black, Indigenous People of color (BIPOC) led and serving Community-Based Organizations (CBOs). Each of these groups designed & implemented engagement that centered the voices and needs of people of color in informing how we will grow and invest in our communities in the coming years. These reports detail their tailored outreach activities and strategies employed in their engagement work.

Next Steps: Phase 3 & 4 Engagement

The City ~~intends to~~ conducted additional rounds of engagement after the release of ~~this~~ the Draft EIS to receive feedback on the draft plan and Draft EIS and on draft zoning maps and legislation that would help implement this plan. ~~We anticipate this~~The engagement ~~will~~ included various approaches for engagement, including in-person meetings and online options. Additional information about public outreach is available on the One Seattle Engagement Hub. See also a hub for the zoning proposals available at: One Seattle Zoning Implementation Hub.

2.3 SEPA Process

2.3.1 Environmental Review

Process

Under SEPA, agencies conduct environmental review of actions that could affect the environment. Preparation of an EIS is required for actions that have the potential for significant impacts. An EIS is a useful tool that provides detailed information to the public, agencies, tribes, and City decision-makers about the environmental effects of a plan or project before a decision is made. As described below and in **Chapter 1,** this document is a non-project EIS that analyzes

the proposal and various alternatives outlined in **Section 2.4** broadly across the study area (WAC 197-11-442).

The EIS process involves the following steps: (1) scoping the contents of the EIS with agencies, tribes, and the public; (2) preparing a draft EIS with a comment period; (3) preparing a final EIS that responds to comments and may develop a preferred alternative; and (4) developing legislation to implement the proposal. With the issuance of the Final~~Draft~~ EIS, the EIS process is in phase 3~~2~~.

Non-Project EIS

This document is a non-project EIS that analyzes a range of legislative changes that will implement One Seattle Plan and alternatives broadly across the study area. SEPA identifies that a non-project EIS is more flexible and studies a range of alternatives comparatively to support the consideration of plans, policies, or programs (WAC 197-11-442). A non-project EIS does not provide detailed site-specific analysis. Additional environmental review may occur when other project or non-project actions are proposed in the city in the future if they are not SEPA exempt. Future review could occur in the form of supplemental EISs, SEPA addenda, or determinations of non-significance.

2.3.2 Public Comment Opportunities

Scoping

The scoping process is intended to identify potential significant impacts on the built and natural environment that should be considered and evaluated in the EIS. The City published a scoping notice and fact sheets on June 23, 2022. While the typical scoping comment period is 21-30 days, the City extended the period to 60 days and closed the comment period on August 22, 2022. Virtual scoping meetings were held during the comment period at 11:00 AM on June 29 and 7:00 PM on July 19, 2022, with a third meeting on 130th/145th Station Area on July 21, 2022. Each meeting had the same format and included an overview presentation and an opportunity to ask questions. The City also conducted other engagement efforts, including outreach by community-based organizations (CBOs) and two debriefs with community liaisons during the scoping period on August 11 and 16, 2022.

The input received during the scoping period included:

- Comments on One Seattle Hub—Shaping the Plan: 851 Comments with 1,439 participants
- Letters or emails: 102 pieces of correspondence
- Scoping meetings: three meetings with 82 participants
- Debriefs with five community liaisons

As part of scoping, the City identified a range of elements of the environment that should be analyzed in the EIS:

- Earth & Water Quality
- Air Quality/GHG
- Plants & Animals
- Energy & Natural Resources
- Noise
- Land Use Patterns
- Historic Resources
- Population, Employment, & Housing
- Transportation
- Public Services & Utilities

See **Appendix A** for the scoping report.

Draft EIS

~~This~~ The Draft EIS identifie~~s~~d environmental conditions, potential environmental impacts, and measures to reduce or mitigate any unavoidable adverse impacts that could result from an update to the One Seattle Comprehensive Plan.

Public and agency comments ~~are~~ were invited on the~~is~~ Draft EIS. Written and verbal comments ~~are~~ were invited during the 60-day public comment period following issuance of the~~is~~ Draft EIS. Public comments ~~will be~~ were considered and are addressed in **Chapter 4** of this~~e~~ Final EIS. Please see the Fact Sheet at the beginning of this ~~Draft~~ Final EIS for the dates of the public comment period and public meeting. Meetings and comment periods regarding the proposals are described on the City's project webpage: www.seattle.gov/opcd/one-seattle-plan.

Final EIS & Mayor's Proposed Plan

~~A~~This Final EIS ~~will be~~is issued in January 2025~~2024~~ and ~~will~~ include~~s~~ responses to public comments received during the Draft EIS comment period. Following the EIS process, we anticipate that the City will adopt the Plan and changes to zoning and development standards.

It is also likely that the Mayor or Council will generate other documents suggesting additional strategies for implementing the vision in the Comprehensive Plan. These documents could include resolutions that would be adopted by Council.

2.4 Proposed Action & Alternatives

The proposal would update the One Seattle Comprehensive Plan to address growth between 2019 and 2044 and adopt new policies and codes that help meet the objectives defined in **Section 2.1.3.** It would also implement text and map amendments to the Comprehensive Plan and changes to zoning and development standards in the Seattle Municipal Code and the Building Code.

One Seattle Comprehensive Plan

Changes to the Comprehensive Plan would help meet the objectives defined in **Section 2.1.3** and would influence the manner and distribution of projected growth and the manner in which the City conducts its operations to promote and achieve other goals such as those related to equity, economic opportunity, environmental sustainability, community, public health, safety, welfare, and service delivery. All Comprehensive Plan elements will be reviewed and updated as part of the proposal. In many cases, proposed policy amendments will reflect changes to state and regional guidance, incorporate language and editorial changes to policies to increase readability, clarify direction and remove redundancies; and add new or updated information since adoption of the current Comprehensive Plan.

Changes to the Comprehensive Plan could include but are not limited to:

- Implementing a major update of the Growth Strategy and Future Land Use Map including:
  - Adding neighborhood centers and corridors as new place types.
  - Combining the multifamily and mixed-use/commercial designations on the Comprehensive Plan's Future Land Use Map categories.
- Updating Citywide and Regional Growth Targets to reflect updated regional targets, market conditions, development capacity, and changes to the growth strategy.
- Eliminating Growth Targets for urban villages or modifying them to reflect changing market conditions, development capacity, and changes to the growth strategy.
- Identifying strategies for addressing displacement.
- Identifying strategies for meeting jurisdictional affordable housing targets.
- Identifying strategies for meeting additional infrastructure needs.
- Identifying strategies for meeting vehicle miles traveled (VMT), mode shift, and greenhouse gas emission goals.
- Updating the Parks levels-of-service (LOS) to reflect updated park goals and acquisition approaches.
- Updating the Transportation levels-of-service (LOS) to reflect updated goals, changing conditions, and address concurrency.
- Removing volume 2 of the Comp Plan which contains goals and policies excerpted from past neighborhood plans.

- Adding or modifying policies for growth strategy place types and zone categories.
- Modifying or implementing new policy changes on a wide variety of topics such as equity, complete communities, increasing housing choices, climate change resilience, greenhouse gas reduction strategies, vision zero, zero waste, electrification, decarbonization, essential public facilities, environmentally critical areas, etc.

Code Changes

Changes to the Seattle Municipal Code would implement the Growth Strategy in the Comprehensive Plan as well as specific goals and policies, particularly those around land use regulations and housing. Changes to zoning and development standards would support City goals such as allowing more people to walk or bike to everyday needs, encouraging better building design, or reducing the cost of housing. These changes could include but are not limited to:

- Modifying heights, floor area ratios, lot size, density limits, coverage limits, setbacks, amenity standards, building separations, structure depth, structure width, and other similar standards affecting the scale and form of new construction to implement goals and policies in the update Comprehensive Plan including those around increasing the supply, diversity, and affordability of housing.
- Creating a new Midrise zone.
- Adding or modifying design standards.
- Allowing more flexibility for commercial uses in certain areas such as allowing more retail on arterial streets, increasing flexibility for home businesses, and allowing ~~corner~~ small-scale commercial uses~~stores~~ in Urban Neighborhood Residential and Lowrise zones.
- Allowing more height and/or floor area for projects that provide public open space or that include affordable housing or housing types such as 3- and 4-story stacked flats or projects with shared open space.
- Updating rezone criteria.
- Reducing or eliminating residential parking minimums citywide.
- Modifying bike parking requirements to recognize the unique conditions across different zones and housing types.
- Modifying solid waste storage requirements to recognize current solid waste needs and to recognize the unique conditions across different zones and housing types.
- Modifying tree and landscaping requirements to increase tree canopy in Neighborhood Residential zones.
- Modifying ~~building code~~ regulations to support development of attached and stacked flat units.
- Implementing or modifying Mandatory Housing Affordability (MHA) requirements.
- ~~Updating tenant relocation assistance requirements to increase support for relocated households.~~

- ~~Updating our transportation concurrency requirements to reflect changes to the level-of-service standard.~~
- Changes to support electric vehicle charging when parking is provided.

Changes to the Comprehensive Plan and Seattle Municipal Code could also implement changes required by state legislation including HB 1110, which requires cities to allow a minimum number of housing units on certain lots and restricts design review and development standards for middle housing, and SB 5412, which updates SEPA categorical exemptions and requires certain environmental analysis, along with other state statutes adopted in the past several years. See **Appendix C** for a list of codes acting as mitigation which can address SB 5412 provisions as well as allowances for raising SEPA thresholds per WAC 197-11-800(1)(c).

See **Appendix J** for proposed legislation, including charts illustrating NR, LR, and MR zone standards.

Place Types & Growth

Alternatives addressed in this EIS are summarized on the following pages. The alternatives primarily distribute growth according to place types like regional centers, urban centers, neighborhood centers, etc. (see sidebar on **page 2-2** and **Exhibit 2.1-1**). Some place types align closely with existing elements of the Alternative 1, No Action, urban village strategy developed with the Seattle 2035 Comprehensive Plan, while others are new concepts created for this update. The alternatives vary the amount and type of housing across place types. **Exhibit 2.4-1** is an overview of common housing types referenced in the place types and alternatives.

Exhibit 2.4-1. Housing Types

Detached homes are in their own structure that do not share walls with any other homes.





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.

Attached houses share walls with other homes, where each unit is owned outright.












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.

Stacked housing includes multiple units arranged vertically.



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, 2022.



E Mercer Street and 19th Avenue E. Source: City of Seattle, 2023.

The most common housing types in the defined places are shown in **Exhibit 2.4-2** below.

Exhibit 2.4-2. 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

Note: See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Source: City of Seattle, 2022.

2.4.1 Alternative 1: No Action

Growth Strategy

Alternative 1 No Action, assumes the continuation of the Seattle 2035 Comprehensive Plan. Even without making any changes to the City's zoning, the existing Comprehensive Plan and implementing regulations would add 80,000 new homes and 158,000 jobs over the next 20 years, based on growth targets adopted by the King County Growth Management Council.[8] These homes and jobs would be distributed across the city based on observed growth between 2010 and 2020 and the distribution of growth in the Seattle 2035 Comprehensive Plan. In addition, growth in each urban center and village would not exceed existing zoned capacity. While the number of people working from home has increased significantly in recent years, job locations are frequently indicated based on the office in which the company is located, rather than where the work occurs. Consequently, future growth may resemble past growth even if the portion of people working from home remains high.

Exhibit 2.4-3 summarizes the acreage, housing target, and job target of Alternative 1 by place type. Under Alternative 1, new housing will continue to be primarily rental apartments concentrated in existing mixed-use areas. Most land outside urban centers and villages will remain limited to detached houses. New jobs will continue to be located primarily in existing urban centers and villages. See **Exhibit 2.4-3** and **Exhibit 2.4-4**. Estimated growth and total housing units and jobs by center are detailed in **Appendix B**.

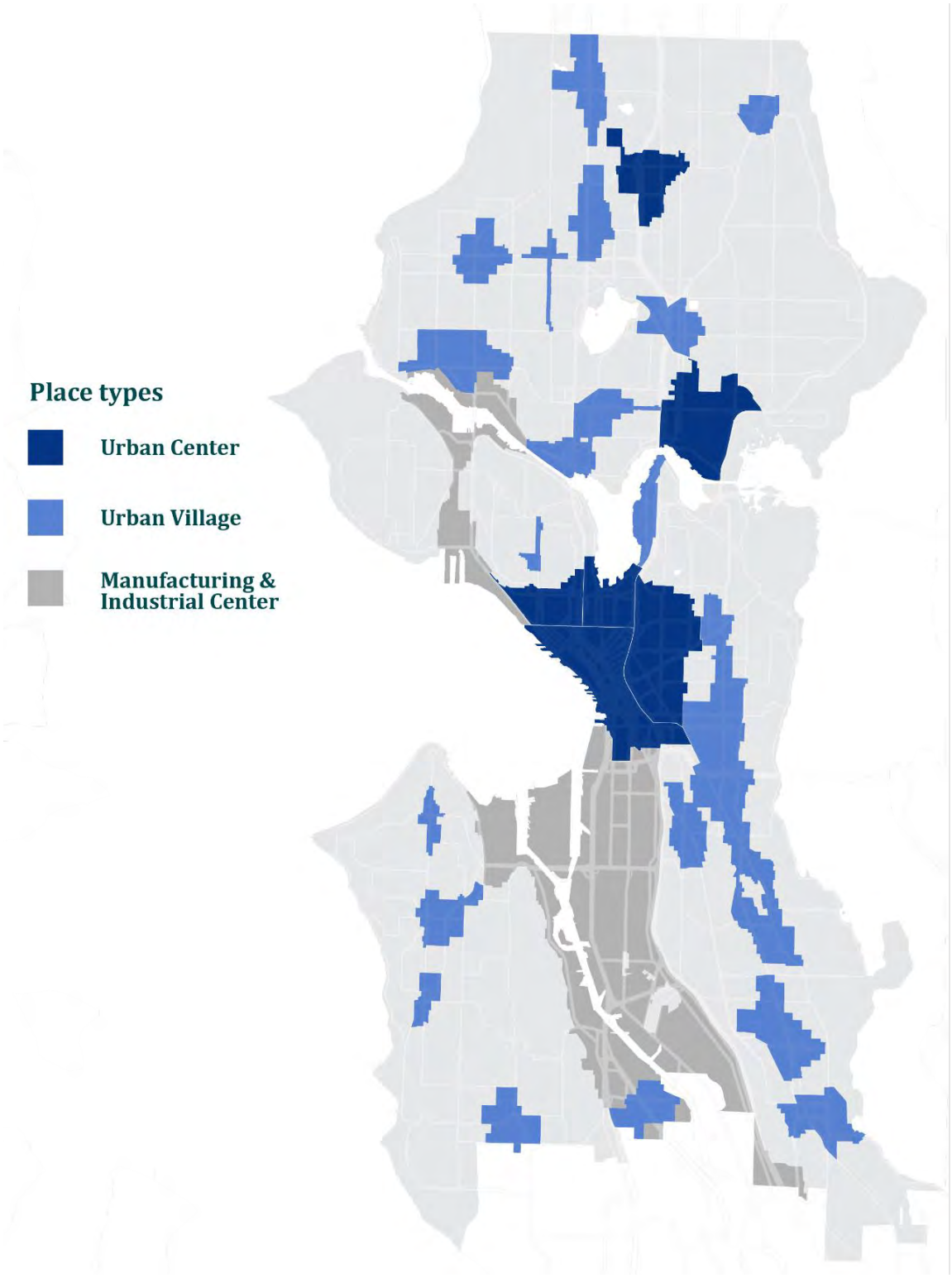
Exhibit 2.4-3. Acres and Growth by Place Type—Alternative 1: No Action

Geography*	Acres (Approx)	Housing Estimate	Job Estimate
Urban Center	3,707	36,970	102,959
Hub Urban Village	1,977	12,885	11,776
Residential Urban Village	4,447	14,764	7,735
Manufacturing Industrial	5,857	1,476	18,800
Growth Area (Maritime Industrial)	39	676	—
Outside Subareas **	37,487	13,229	16,730
No Change to Place Type in This Alternative	33,633	6,494	6,816
No Change to Place Type in ~~All~~ Alternatives 1-5	3,854	6,735	9,914
Total	**53,515**	**80,000**	**158,000**

Notes: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~. **"Outside Subareas" includes all areas outside the other listed geographies. No change to place type is proposed in these areas under Alternatives 1-5 though growth will continue to occur throughout the 20-year planning period.
Source: City of Seattle, 2023; BERK, 2023.

[8] Growth targets were set for the years 2019-2044, but in the EIS have been adjusted to match the required 20-year planning period for 2024-2044, to account for population, housing, and employment change for the years 2019-2023.

Exhibit 2.4-4. Alternative 1: No Action*



Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other aAlternatives 2–5.
Source: City of Seattle, 2023.

Most housing would be in Area 4 encompassing Downtown, followed by Area 1 which contains the Ballard Urban Village and Area 5 which contains the Capitol Hill Urban Center. See **Exhibit 2.4-5** and **Exhibit 2.1-2**.

Exhibit 2.4-5. Housing Growth by Location—Alternative 1: No Action

Geography*	1	2	3	4	5	6	7	8	Total
Urban Center	—	6,049	3,595	18,265	9,061	—	—	—	**36,970**
Hub Urban Village	7,588	927	—	—	—	3,128	—	1,242	**12,885**
Residential Urban Village	3,822	1,466	402	1,010	3,193	1,143	259	3,469	**14,764**
Manufacturing Industrial	—	—	628	—	—	—	848	—	**1,476**
Growth Area (Maritime Industrial)	—	—	—	—	144	—	392	140	**676**
Outside Subareas— No Change to Place Type in:	2,342	4,352	1,393	138	856	1,908	430	1,810	**13,229**
This Alternative	1,040	2,006	534	—	570	1,225	168	951	6,494
~~All~~ Alternatives 1-5	1,302	2,346	859	138	286	683	262	859	6,735
Total	**13,752**	**12,794**	**6,018**	**19,413**	**13,254**	**6,179**	**1,929**	**6,661**	**80,000**

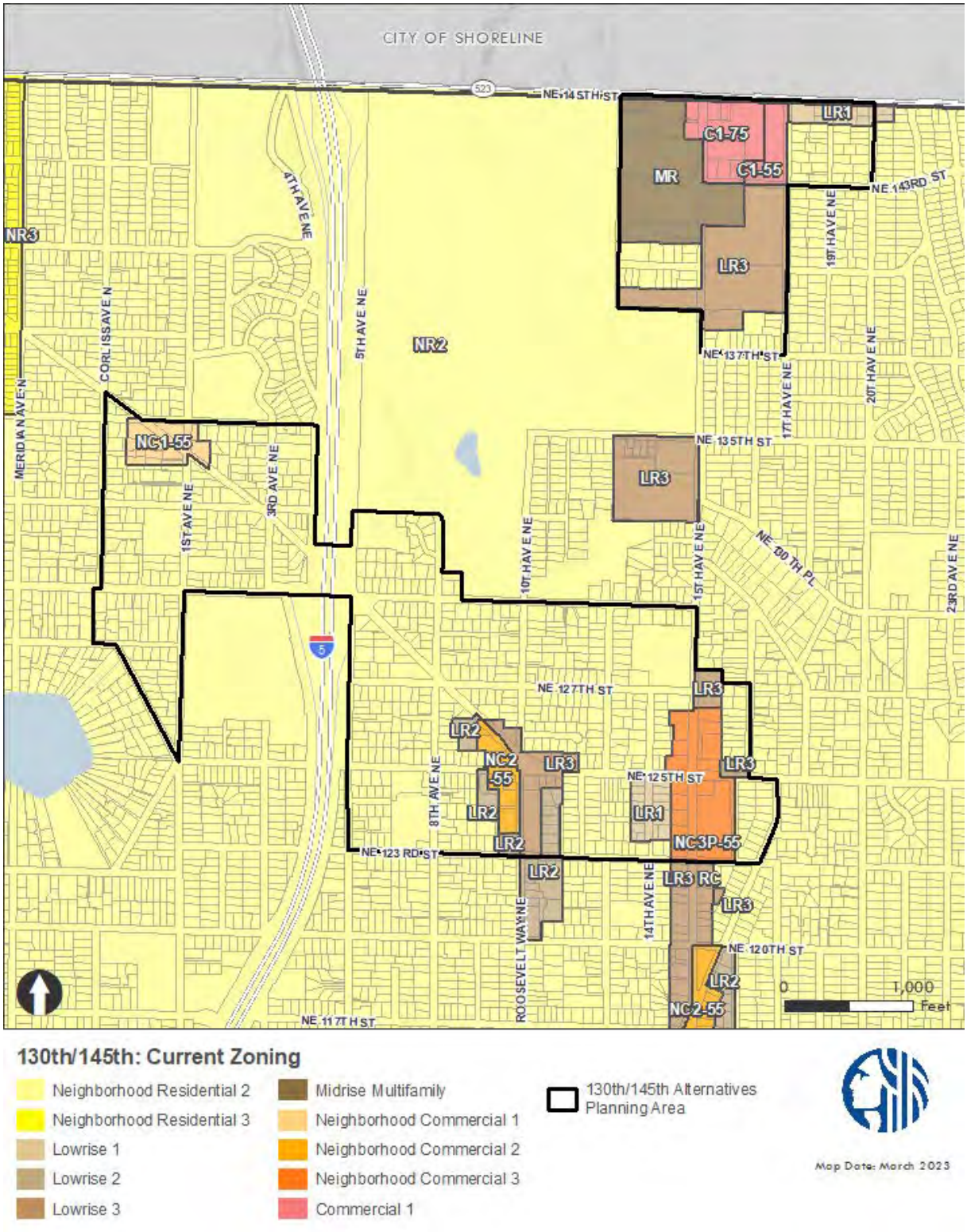
Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Source: City of Seattle, 2023; BERK, 2023.

130th/145th Station Area

The current Comprehensive Plan and zoning designations would be retained under Alternative 1~~,~~ No Action, in the 130th/145th Station Area. The current Neighborhood Residential zone would continue to allow three-story residential development around the future light rail station at 130th and some 4- to 8-story multifamily uses near the 145th BRT station. See **Exhibit 2.4-6**.

The key elements of growth and development in the 130th/145th Station Study Area under Alternative 1 are shown in **Exhibit 2.4-7**. Housing and job growth around both station areas would be minimal—194 housing units and 109 jobs added around 130th and 646 housing units and 607 jobs around 145th.

Exhibit 2.4-6. 130th/145th Station Area Current Zoning—Alternative 1: No Action*



Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Sources: City of Seattle, 2022; BERK, 2022.

Exhibit 2.4-7. 130th/145th Station Area Features—Alternative 1: No Action*

Feature	Alternative 1: No Action (aligns with citywide Alternative 1)	Assumptions
Amount and Pattern of Growth	Growth reflects the baseline amount of growth and continues the current pattern. No new areas will be designated for mixed-use or higher density.	Growth in Housing Units: 840* Growth in Jobs: 716** Activity Units (Existing and Growth): ▪ 130th Existing: 4,006, 18.4 per acre ▪ 130th Future: 4,514, 20.9 per acre ▪ 145th Existing: 2,298, 35.3 per acre ▪ 145th Future: 4,229, 64.9 per acre
Building Types for New Construction	Building types will be unchanged; larger single-family structures, accessory dwelling units, and limited multifamily and mixed-use development.	
Building Heights for New Construction	Heights will be unchanged.	Heights would range 45 to 80 feet for multifamily residential and mixed-use buildings, and 30 feet for single-family structures and accessory dwelling units.
Retail and Commercial	The location of retail and commercial uses will be unchanged.	

Notes: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
** The growth estimates consider the current zoning within a common maximum boundary (Alternative 5).
Sources: City of Seattle, 2023; BERK, 2023.

2.4.2 Alternative 2: Focused

Growth Strategy

Alternative 2 would designate additional areas of focused growth called neighborhood centers to create more housing around shops and services. Neighborhood centers would be similar to urban centers (formally known as urban villages) since they would allow a wide range of housing types and commercial space, but with a smaller geographic size and lower intensity of allowed development. This alternative would result in a greater range of housing options with amenities and services in many neighborhoods. Neighborhood centers could have a range of housing from townhouses to 7 story stacked housing.

Alternative 2 studies a total housing growth of 100,000 housing units (20,000 more than the No Action Alternative) to account for the potential additional housing demand assumed within neighborhood centers. Eighty thousand new homes would be located in a similar distribution to Alternative 1, with 20,000 additional homes accommodated in new housing types within neighborhood centers. Neighborhood centers in areas with low displacement risk are allocated 50% more housing units than those in areas with high displacement risk.

Under Alternative 2, about 3,000 acres currently designated for lower-density residential would change to a neighborhood center designation, and these areas would accommodate the second highest share of anticipated housing growth. A small job shift from the larger centers would occur towards the neighborhood centers. The most housing growth would be in the Downtown/South Lake Union (Area 4) followed by Northwest and Northeast Seattle (Areas 1 and 2). See **Exhibit 2.4-8**, **Exhibit 2.4-9**, and **Exhibit 2.4-10**.

Estimated growth and total housing units and jobs by center are detailed in **Appendix B**.

Exhibit 2.4-8. Acres and Growth by Place Type—Alternative 2: Focused

Geography*	Approximate Acres	Housing Estimate	Job Estimate
Regional Center	3,707	36,970	99,870
Urban Center (former Hub Urban Village)	1,977	12,885	11,417
Urban Center (former Residential Urban Village)	4,447	14,764	7,535
Manufacturing Industrial Centers	5,857	1,476	18,800
Growth Area (Maritime Industrial)	39	676	—
Neighborhood Center	2,923	24,167	8,628
Urban Neighborhood	—	—	—
Corridor	—	—	—
Outside Subareas**	34,622	9,062	11,750
No Change to Place Type in This Alternative	30,768	2,327	2,133
No Change to Place Type in ~~All~~ Alternatives 1-5	3,854	6,735	9,617
Total	**53,573**	**100,000**	**158,000**

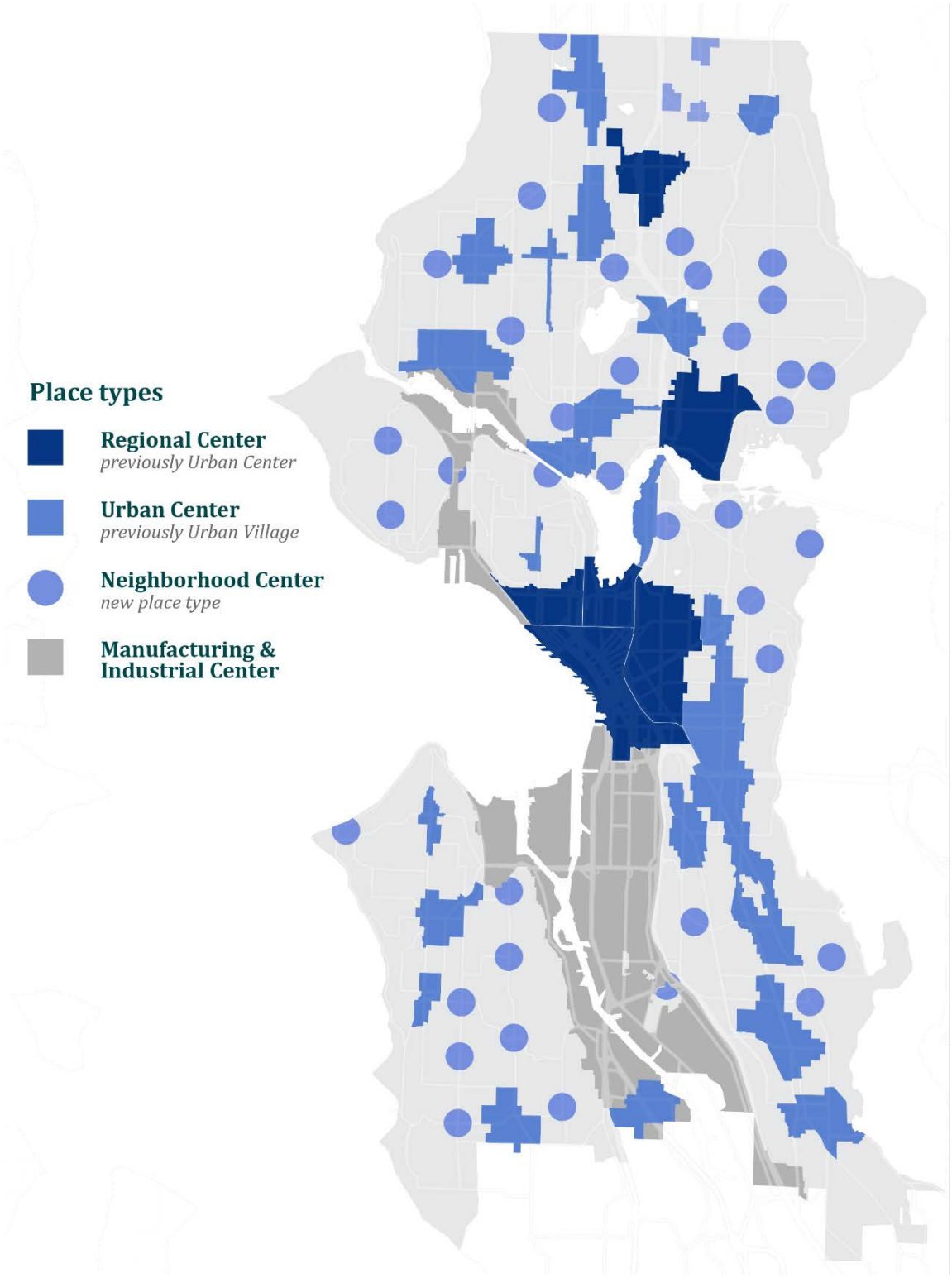
Notes: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
** "Outside Subareas" includes all areas outside of one of the other listed geographies. No change to place type is proposed in these areas under Alternatives 1-5 though growth will continue to occur throughout the 20-year planning period. Alternative 2 distributes 85% of job growth in the same manner as the No Action Alternative. The other 15% is distributed based on the total housing growth in each alternative—in other words, Alternative 2 assumes a small job shift from the larger centers towards other place types to reflect local demand with the distribution of new housing.
Source: City of Seattle, 2023; BERK, 2023.

Exhibit 2.4-9. Housing Growth by Location—Alternative 2: Focused

Geography*	1	2	3	4	5	6	7	8	Total
Regional Center	—	6,049	3,595	18,265	9,061	—	—	—	36,970
Urban Center (former Hub Urban Village)	7,588	927	—	—	—	3,128	-	1,242	12,885
Urban Center (former Residential Urban Village)	3,822	1,466	402	1,010	3,193	1,143	259	3,469	14,764
Manufacturing Industrial	—	—	628	—	—	—	848	—	1,476
Growth Area (Maritime Industrial)	—	—	—	—	144	—	392	140	676
Neighborhood Center—Low Risk**	5,394	6,541	2,402	—	3,430	1,706	—	546	20,019
Neighborhood Center—High Risk**	—	453	—	—	—	2,308	506	881	4,148
Outside Subareas— No Change to Place Type in:	1,564	2,828	1,042	138	503	1,142	266	1,579	9,062
This Alternative	262	482	183	—	217	459	4	720	2,327
~~All~~ Alternatives 1-5	1,302	2,346	859	138	286	683	262	859	6,735
Total	**18,368**	**18,264**	**8,069**	**19,413**	**16,331**	**9,427**	**2,271**	**7,857**	**100,000**

Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~. **Risk of displacement.
Source: City of Seattle, 2023; BERK, 2023.

Exhibit 2.4-10. Alternative 2: Focused*



Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle, 2023.

130th/145th Station Area

The City has created a final draft subarea plan with several purposes:

- **Create city and community concepts** around land use, transportation and other policies and investments for fast, reliable transit and compact walkable neighborhoods.
- **Align with the One Seattle Comprehensive Plan**
- **Lead with equity** to address past systemic inequities and minimize factors that contribute to displacement.
- **Address climate change** by reducing vehicle miles traveled, car dependency, and greenhouse gas (GHG) emissions.

Alternative 2 would include land use designations, zoning, and policies that would address transit-oriented development near transit investments.

Neighborhood centers would be designated in these areas: (1) near NE 130th Street and Roosevelt Way NE to the east of I-5, (2) NE 125th Street and 15th Ave NE (Pinehurst), and (3) NE 145th Street and 15th Ave NE. Zoning to implement the centers would include a combination of Lowrise Residential, Midrise Residential, and Neighborhood Commercial (NC3). The development would be more mixed use near the 145th Station Area (with NC3) compared to Alternative 1. Heights would be greater at up to seven stories, particularly along the 145th Station Area. See **Exhibit 2.4-13**.

Both stations areas would see more growth clustered in the newly designated neighborhood centers under Alternative 2 compared to the No Action Alternative. However, housing and job growth would be relatively modest—1,049 housing units and 284 jobs would be added around 130th Street and 1,159 housing units and 695 jobs would be added around NE 145th Street. See **Exhibit 2.4-11** and **Exhibit 2.4-12**. Alternative 2 would provide more housing and jobs and would increase activity units from 18.4 (existing) to 29.6 around NE 130th Street and from 35.3 (existing) to 82.4 around 15th Ave NE and NE 145th St. Activity units means the sum of population and jobs units per gross acre and is used by PSRC for evaluating combined residential and job density.

Exhibit 2.4-11. Station Area Share of Targets 2024-2044—Alternative 2: Focused

Location	Place Type*	New Place Acres**	New Housing Units**	New Jobs**	Activity Units (Existing)/Ac.	Activity Units (Future)/Ac.
NE 130th Street	Neighborhood Center	52	1,049	284	18.4	29.6
15th & 145th	Neighborhood Center	65	1,159	695	35.3	82.4

Notes: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
**New place acres are the total acres within the neighborhood center boundary under Alternative 2. The growth estimates consider the proposed growth concept under Alternative 2 within a common maximum boundary (Alternative 5). The 130th Street and Pinehurst Neighborhood Centers in Alternative 2 are both part of the 130th Street Urban Center in Alternative 5 and so are listed under NE 130th Street in this table.
Source: City of Seattle, 2023; BERK, 2023.

Exhibit 2.4-12. 130th/145th Station Area Features—Alternative 2: Focused

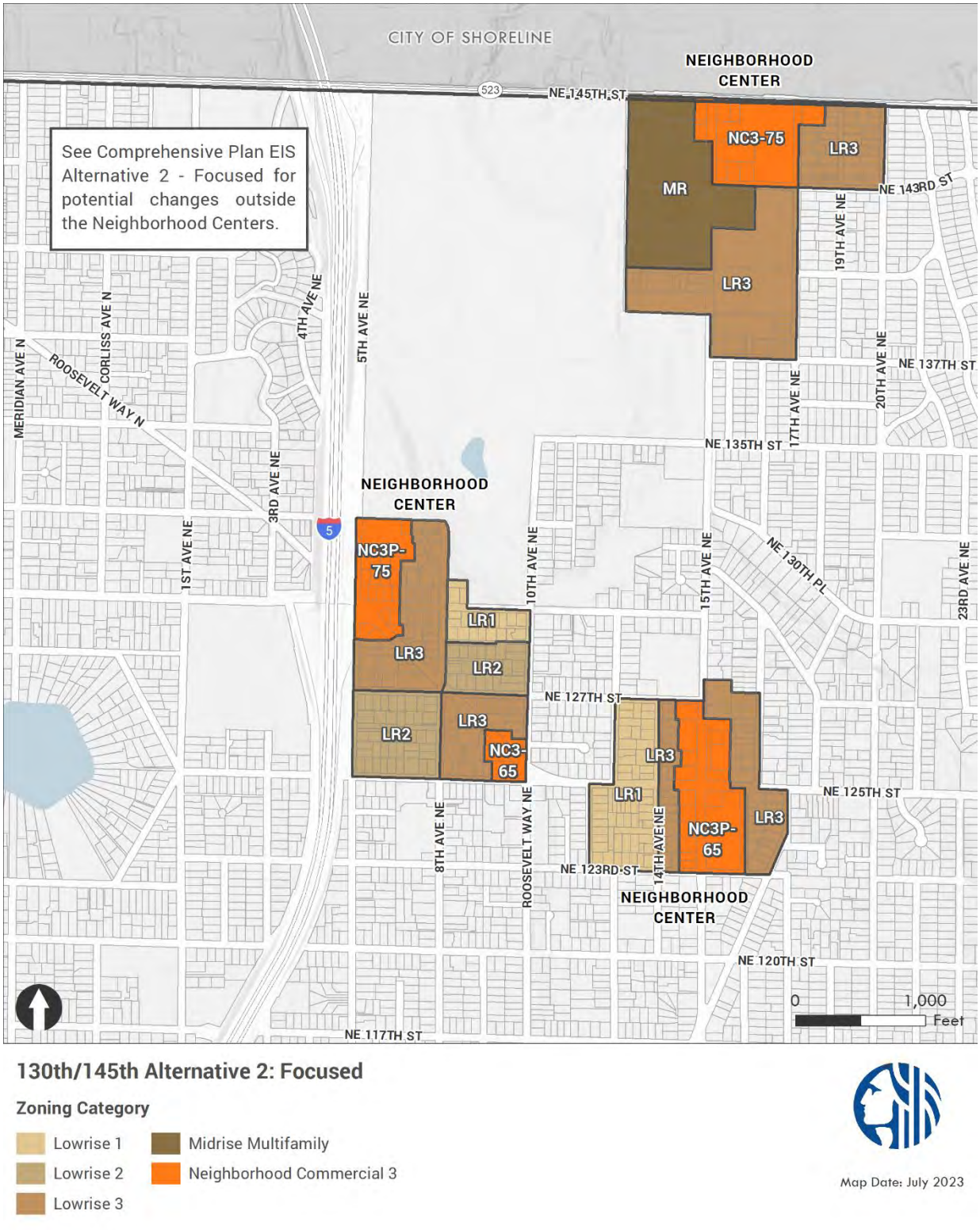
Feature	Alternative 2: Focused (aligns with citywide Alternative 2)*	Assumptions
Amount and Pattern of Growth	Cluster growth in newly designated small mixed-use node(s).	Growth in housing units: 2,208** Growth in jobs: 979** Activity units (existing and future people and jobs) and activity units per acre ▪ 130th: 6,441 units, 29.6 per acre ▪ 145th: 5,369 units, 82.4 per acre
Building Types for New Construction	Denser and taller buildings in nodes. More mixed-use buildings.	
Building Heights for New Construction		Neighborhood Centers: Potentially up to 40-80 ft
Retail and Commercial	More retail and commercial locations than Alternative 1.	

Notes: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
** The growth estimates consider the proposed growth concept under Alternative 2 within a common maximum boundary (Alternative 5).
Source: City of Seattle, 2023; BERK, 2023.

In addition to establishing future land use and zoning designations supporting the station area, the City's Station Area Plan provides direction on key policy issues:

- Land Use/Housing
  - Provide more density/diversity of land uses concurrent with transit.
  - Provide more housing choice.
  - Offer affordable housing options near light rail and Bus Rapid Transit (BRT).
  - Mitigate displacement of current residents and businesses
- Amenities/Public Realm
  - Coordinate update of street types in Streets Illustrated.
  - Establish a strong visual identity for the station areas, including architecture, landscape design, public art, public realm improvements, and neighborhood wayfinding.
  - Provide amenities to support anticipated growth.
  - Retain tree canopy and healthy open spaces/environment.
- Access
  - Provide non-motorized access to the stations (safe etc.).
  - Coordinate with WSDOT, Sound Transit, and City of Shoreline.
  - Address parking regulations.

Exhibit 2.4-13. 130th/145th Station Area Zoning Concept—Alternative 2: Focused*



Notes: See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Source: City of Seattle, 2022; BERK, 2022.

2.4.3 Alternative 3: Broad

Growth Strategy

This alternative allows a wider range of low-scale housing options, like triplexes and fourplexes, in all Neighborhood Residential (NR) zones as part of a new urban neighborhood place type. This approach would:

- Expand housing choices in all neighborhoods.
- Increase production of homeownership options.
- Address exclusionary nature of current zoning.
- Allow more housing options near existing large parks and other neighborhood amenities.

Housing in the urban neighborhood place type could include duplexes, triplexes, and fourplexes, as well as stacked flats and sixplexes on larger lots. Market-rate development in these areas would continue to have a three-story height limit, consistent with current rules in Neighborhood Residential zones. The City is also considering potential height, floor area, or density bonuses for affordable housing projects.

Alternative 3 studies a total housing growth of 100,000 housing units (20,000 more than the No Action Alternative) to account for the potential additional housing demand that is expected with broad zoning changes. Eighty thousand units would be located in a similar distribution to Alternative 1, with 20,000 additional homes accommodated within urban neighborhood areas.

Alternative 3 studies the same number of jobs as the No Action Alternative but includes a small shift in the distribution of jobs and commercial space toward existing urban neighborhood areas to reflect local demand consistent the distribution of new housing. The City is also considering allowing more flexibility for commercial space in urban neighborhood areas such as allowing corner stores and making it easier to operate at-home businesses. This flexibility supports the development of neighborhoods where more people can walk and bike to everyday needs.

Citywide, most land would remain designated as urban neighborhood, though most housing growth potential would still be in regional centers and urban centers. Most new jobs would occur in the regional centers and the manufacturing industrial centers. See **Exhibit 2.4-14**, **Exhibit 2.4-15**, and **Exhibit 2.4-16**.

Unlike Alternatives 1 and 2, the most growth would be in Northeast Seattle followed by the Downtown/South Lake Union study area. See **Exhibit 2.4-15**.

Estimated growth and total housing units and jobs by center are detailed in **Appendix B**.

Exhibit 2.4-14. Acres and Growth by Place Type—Alternative 3: Broad

Geography*	Approximate Acres	Housing Estimate	Job Estimate
Regional Center	3,707	36,970	99,870
Urban Center (former Hub Urban Village)	1,977	12,885	11,417
Urban Center (former Residential Urban Village)	4,447	14,764	7,535
Manufacturing Industrial Centers	5,857	1,476	18,800
Growth Area (Maritime Industrial)	39	676	—
Neighborhood Center	—	—	—
Urban Neighborhood	32,581	22,423	5,906
Corridor	—	—	—
Outside Subareas**	4,907	10,806	14,472
No Change to Place Type in This Alternative	1,052	4,071	4,855
No Change to Place Type in ~~All~~ Alternatives 1-5	3,854	6,735	9,617
Total	**53,515**	**100,000**	**158,000**

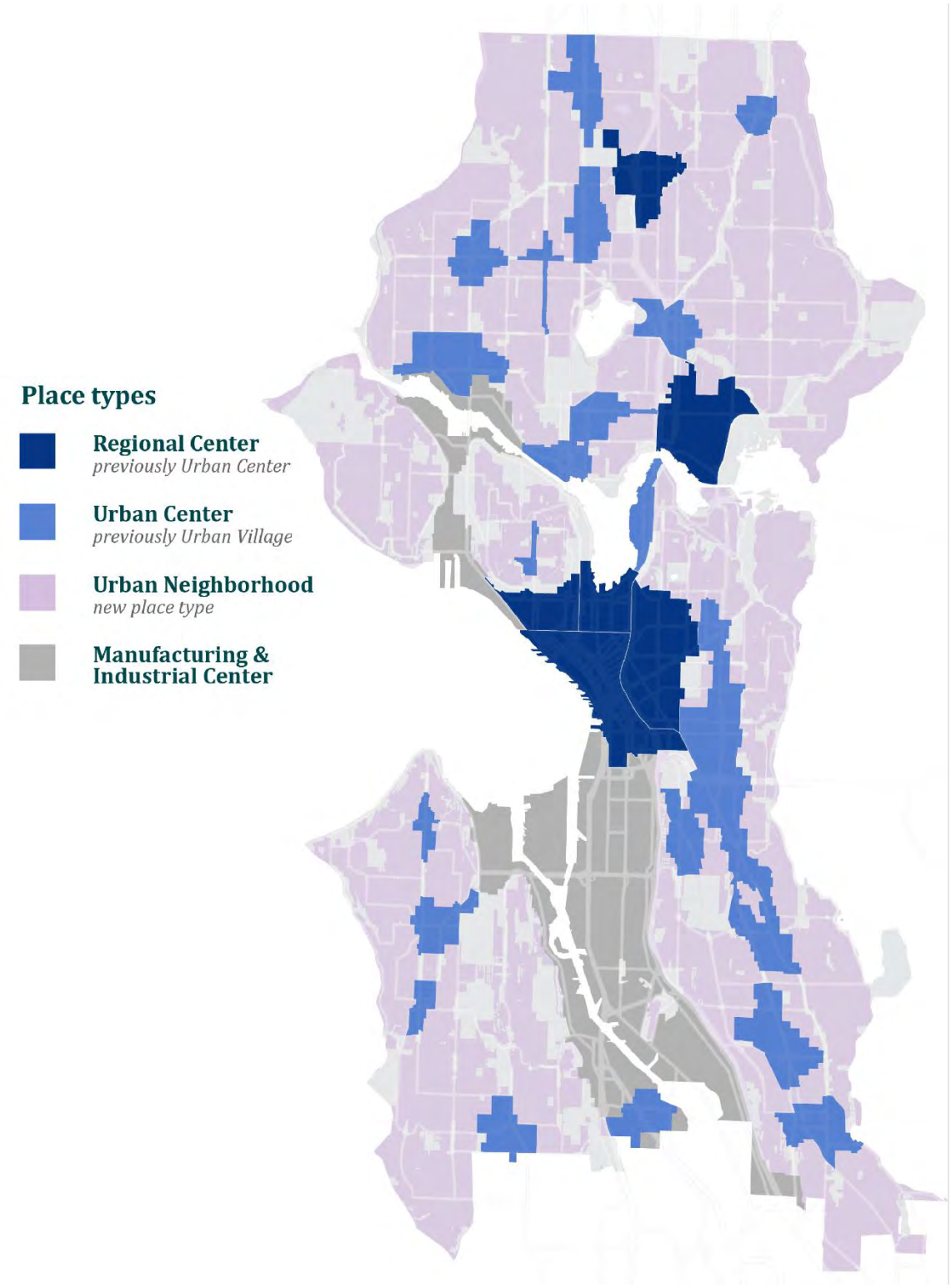
Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
**"Outside Subareas" includes all areas outside the other listed geographies. No change to place type is proposed in these areas under Alternatives 1-5 though growth will continue to occur throughout the 20-year planning period. Alternative 3 distributes 85% of job growth in the same manner as the No Action Alternative. The other 15% is distributed based on the total housing growth in each alternative—in other words, Alternative 3 assumes a small job shift from the larger centers towards other place types to reflect local demand with the distribution of new housing.
Source: City of Seattle, 2023; BERK, 2023.

Exhibit 2.4-15. Housing Growth by Location—Alternative 3: Broad

Geography*	1	2	3	4	5	6	7	8	Total
Regional Center	—	6,049	3,595	18,265	9,061	—	—	—	**36,970**
Urban Center (former Hub Urban Village)	7,588	927	—	—	—	3,128	—	1,242	**12,885**
Urban Center (former Residential Urban Village)	3,822	1,466	402	1,010	3,193	1,143	259	3,469	**14,764**
Manufacturing Industrial	—	—	628	—	—	—	848	—	**1,476**
Growth Area (Maritime Industrial)	—	—	—	—	144	—	392	140	**676**
Urban Neighborhood	4,095	7,921	875	—	741	4,480	21	4,290	**22,423**
Outside Subareas— No Change to Place Type in:	2,062	3,843	1,214	138	620	1,426	427	1,076	**10,806**
This Alternative	760	1,497	355	—	334	743	165	217	4,071
~~All~~ Alternatives 1-5	1,302	2,346	859	138	286	683	262	859	6,735
Total	**17,567**	**20,206**	**6,714**	**19,413**	**13,759**	**10,177**	**1,947**	**10,217**	**100,000**

Note: * See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Source: City of Seattle, 2023; BERK, 2023.

Exhibit 2.4-16. Alternative 3: Broad*



Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~. Place type names were corrected in the legend for the Final EIS to reflect the proposed place type names.
Source: City of Seattle, 2023.

130th/145th Station Area

Under this alternative, no changes would occur to the future land use map in the 130th/145th station area, but urban neighborhood areas would have more flexibility for middle housing, corner stores, and at-home businesses.

2.4.4 Alternative 4: Corridor

Growth Strategy

This alternative would allow a wider range of housing options only in corridors to focus growth within a short walk of transit and amenities. This alternative would increase production of both homeownership and rental options in various neighborhoods and support City and regional investment in transit. Corridors could have a range of housing options from duplexes to 5-story stacked housing or higher heights in existing multifamily/commercial areas.

Alternative 4 studies a total housing growth of 100,000 housing units (20,000 more than the No Action Alternative) to account for the potential additional housing demand that is expected within the corridors. Eighty thousand units would be located in a similar distribution to Alternative 1, with 20,000 additional homes accommodated within corridors. Alternative 4 would have the same number of jobs as the No Action Alternative but includes a small shift in the distribution of jobs and commercial space toward corridors, consistent with the distribution of new housing.

Corridor areas would be the largest single place type and would accommodate the second highest housing growth after regional centers. Most jobs would be generated in the regional centers and the manufacturing industrial centers. See **Exhibit 2.4-17**, **Exhibit 2.4-18**, and **Exhibit 2.4-19**.

The most housing is proposed in Northeast Seattle followed by the Downtown/South Lake Union study area (similar to Alternative 3 but in a format that densifies corridors). See **Exhibit 2.4-18**.

Estimated growth and total housing units and jobs by center are detailed in **Appendix B**.

Exhibit 2.4-17. Acres and Growth by Place Type—Alternative 4: Corridor

Geography*	Approximate Acres	Housing Estimate	Job Estimate
Regional Center	3,707	36,970	99,870
Urban Center (former Hub Urban Village)	1,977	12,885	11,417
Urban Center (former Residential Urban Village)	4,447	14,764	7,535
Manufacturing Industrial	5,857	1,476	18,800
Growth Area (Maritime Industrial)	39	676	—
Neighborhood Center	—	—	—
Urban Neighborhood	—	—	—
Corridor	20,420	21,207	3,910
Outside Subareas**	17,067	12,022	16,468
No Change to Place Type in This Alternative	13,213	5,287	6,851
No Change to Place Type in ~~All~~ Alternatives 1-5	3,854	6,735	9,617
Total	**53,514**	**100,000**	**158,000**

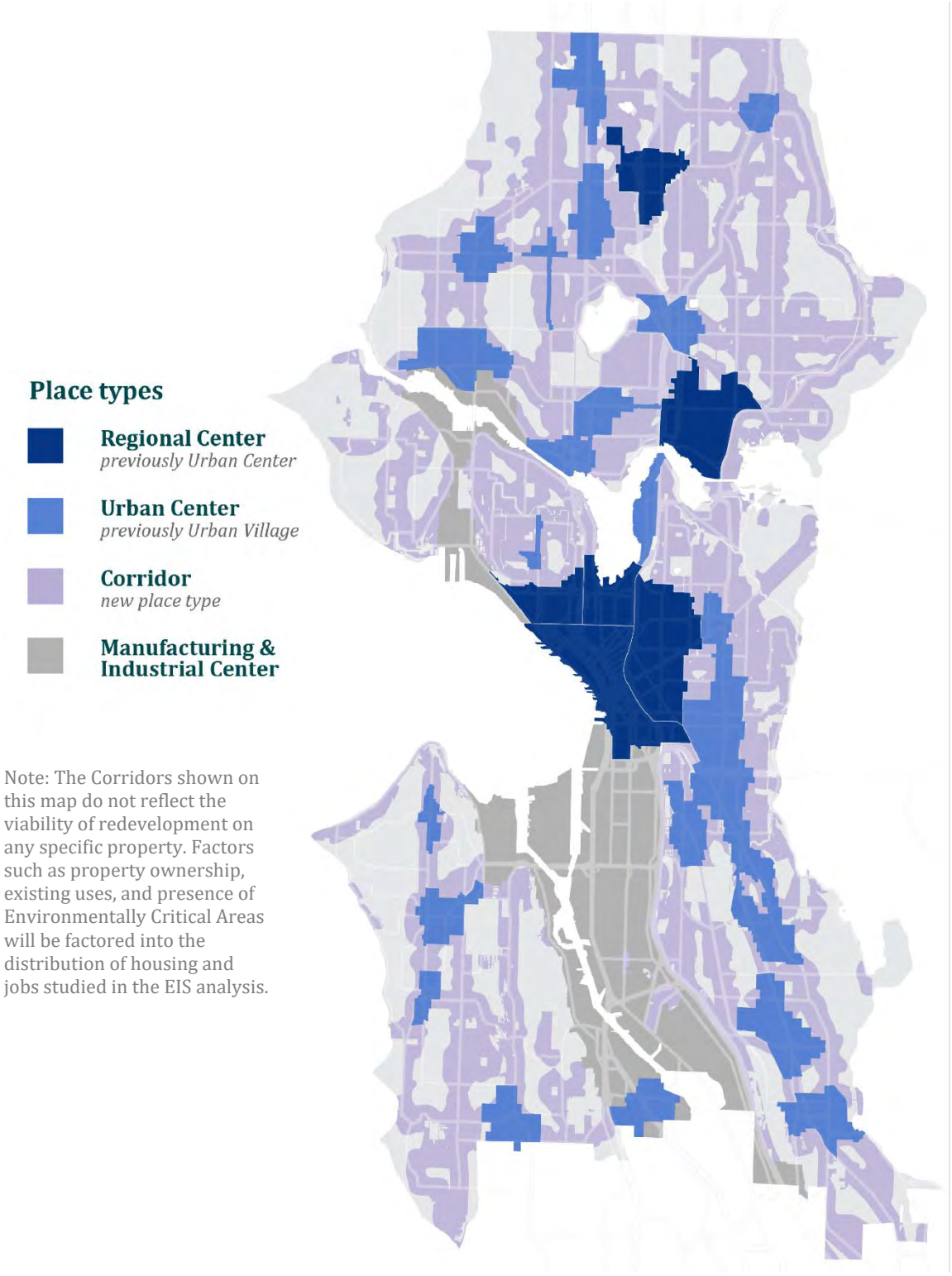
Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
**"Outside Subareas" includes all areas outside the other listed geographies. No change to place type is proposed in these areas under Alternatives 1-5 though growth will continue to occur throughout the 20-year planning period. Alternative 4 distribute 85% of job growth in the same manner as the No Action Alternative. The other 15% is distributed based on the total housing growth in each alternative—in other words, Alternative 4 assumes a small job shift from the larger centers towards other place types to reflect local demand with the distribution of new housing.
Source: City of Seattle, 2023; BERK, 2023.

Exhibit 2.4-18. Housing Growth by Location—Alternative 4: Corridor

Geography*	1	2	3	4	5	6	7	8	Total
Regional Center	—	6,049	3,595	18,265	9,061	—	—	—	**36,970**
Urban Center (former Hub Urban Village)	7,588	927	—	—	—	3,128	—	1,242	**12,885**
Urban Center (former Residential Urban Village)	3,822	1,466	402	1,010	3,193	1,143	259	3,469	**14,764**
Manufacturing Industrial	—	—	628	—	—	—	848	—	**1,476**
Growth Area (Maritime Industrial)	—	—	—	—	144	—	392	140	**676**
Corridor	3,579	8,484	694	—	719	4,114	33	3,584	**21,207**
Outside Subareas— No Change to Place Type in:	2,212	4,115	1,319	138	690	1,676	426	1,446	**12,022**
This Alternative	910	1,769	460	—	404	993	164	587	5,287
~~All~~ Alternatives 1-5	1,302	2,346	859	138	286	683	262	859	6,735
Total	**17,201**	**21,041**	**6,638**	**19,413**	**13,807**	**10,061**	**1,958**	**9,881**	**100,000**

Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Source: City of Seattle, 2023; BERK, 2023.

Exhibit 2.4-19. Alternative 4: Corridor*



Note: The Corridors shown on this map do not reflect the viability of redevelopment on any specific property. Factors such as property ownership, existing uses, and presence of Environmentally Critical Areas will be factored into the distribution of housing and jobs studied in the EIS analysis.

Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle, 2023.

130th/145th Station Area

Within the station areas, a wider range of housing options would be allowed only in corridors consistent with the citywide approach.

2.4.5 Alternative 5: Combined

Growth Strategy

Alternative 5 anticipates the largest increase in supply and diversity of housing across Seattle. It includes the strategies for encouraging housing growth in Alternatives 2, 3, and 4 plus additional changes to existing urban center and village boundaries and changes to place type designations. This alternative seeks to:

- Accommodate abundant housing in neighborhoods across the city.
- Promote a greater range of rental and ownership housing.
- Address past underproduction of housing and rising housing costs.

Alternative 5 assumes growth of 120,000 housing units (40,000 more than the No Action Alternative) to account for the potential additional housing growth that could occur under a combination of changes identified in Alternatives 2, 3, and 4 plus designating Ballard as a regional center, expanding boundaries of seven existing urban centers (formerly called urban villages), and designating the 130th Station Area as an urban center. Eighty thousand units would be located in a similar distribution to Alternative 1, with the additional 40,000 homes distributed based on a combination of Alternatives 2, 3, and 4. The distribution of jobs and housing would be a combination of the other alternatives after accounting for expanded urban village boundaries and potential changes to place type designations. See **Exhibit 2.4-20**, **Exhibit 2.4-21**, and **Exhibit 2.4-22**.

Most housing growth would be in Northwest and Northeast Seattle (Areas 1 and 2) followed by Downtown/South Lake Union (Area 4). While most housing would continue to be in regional centers and urban centers, the combined growth in neighborhood centers and corridors would also be substantial. See **Exhibit 2.4-21**.

Estimated growth and total housing units and jobs by center are detailed in **Appendix B**.

Exhibit 2.4-20. Acres and Growth by Place Type—Alternative 5: Combined

Geography*	Approximate Acres	Housing Estimate	Job Estimate
Regional Center	3,765	43,051	101,908
Urban Center (former Hub Urban Village)	2,157	7,855	7,273
Urban Center (former Residential Urban Village)	5,606	22,862	8,878
Manufacturing Industrial	5,857	1,476	18,800
Growth Area (Maritime Industrial)	39	676	—
Neighborhood Center	2,830	19,641	7,072
Urban Neighborhood	11,728	8,848	3,113
Corridor	17,736	8,856	1,538
Outside Subareas**	3,854	6,735	9,418
No Change to Place Type in This Alternative	—	—	—
No Change to Place Type in ~~All~~ Alternatives 1-5	3,854	6,735	9,418
Total	**53,572**	**120,000**	**158,000**

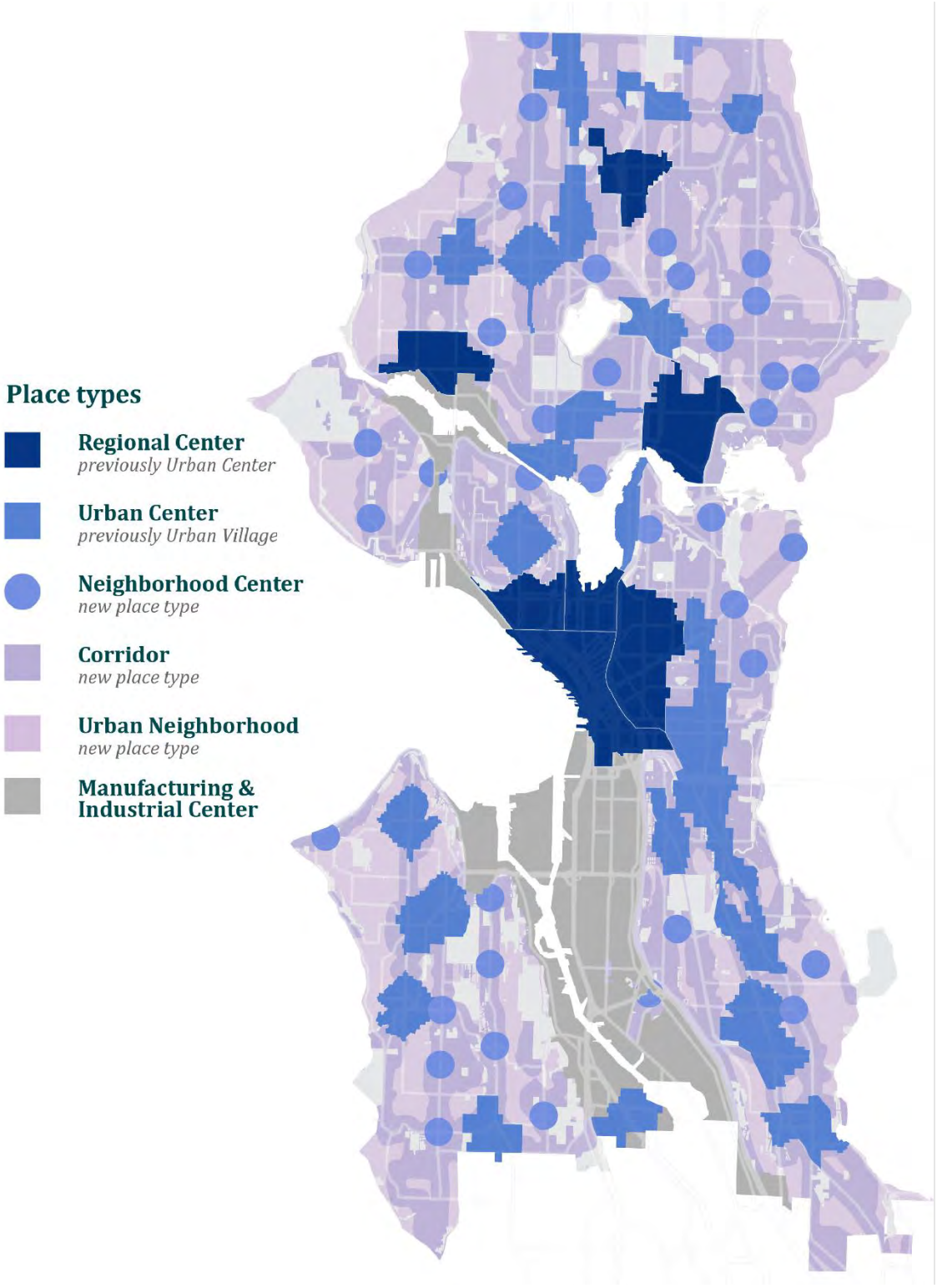
Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
**"Outside Subareas" includes all areas outside the other listed geographies. No change to place type is proposed in these areas under Alternatives 1-5 though growth will continue to occur throughout the 20-year planning period. Alternative 5 distribute 85% of job growth in the same manner as the No Action Alternative. The other 15% is distributed based on the total housing growth in each alternative—in other words, Alternative 5 assumes a small job shift from the larger centers towards other place types to reflect local demand with the distribution of new housing.
Source: City of Seattle, 2023; BERK, 2023.

Exhibit 2.4-21. Housing Growth by Location—Alternative 5: Combined

Geography*	1	2	3	4	5	6	7	8	Total
Regional Center	6,042	6,049	3,364	18,265	9,061	—	—	—	**43,051**
Urban Center (former Hub Urban Village)	2,546	927	—	—	—	3,140	—	1,242	**7,855**
Urban Center (former Residential Urban Village)	3,838	3,110	429	1,010	3,194	2,884	1,659	6,738	**22,862**
Manufacturing Industrial Centers	—	—	628	—	—	—	848	—	**1,476**
Growth Area (Maritime Industrial)	—	—	—	—	144	—	392	140	**676**
Neighborhood Center—Low Risk**	4,494	5,127	2,002	—	2,830	1,406	—	446	**16,306**
Neighborhood Center—High Risk**	—	—	—	—	—	2,083	461	791	**3,335**
Urban Neighborhood	1,885	2,569	310	—	240	1,878	—	1,966	**8,848**
Corridor	1,390	3,429	305	—	346	1,674	14	1,698	**8,856**
Outside Subareas— No Change to Place Type in:	1,302	2,346	859	138	286	683	262	859	**6,735**
This Alternative	—	—	—	—	—	—	—	—	—
~~All~~ Alternatives 1-5	1,302	2,346	859	138	286	683	262	859	6,735
Total	**21,498**	**23,558**	**8,164**	**19,413**	**16,100**	**13,748**	**3,637**	**13,881**	**120,000**

Notes: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
**Risk of displacement.
Source: City of Seattle, 2023; BERK, 2023.

Exhibit 2.4-22. Alternative 5: Combined*



Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~. Place type names were corrected in the legend for the Final EIS to reflect the proposed place type names.
Source: City of Seattle, 2023.



Source: City of Seattle 130th and 145th Station Area Planning Multimodal Mobility Study, December 2020.

130th/145th Station Area

Under Alternative 5, an urban center would be created straddling the west and east sides of I-5 at the Sound Transit light rail station, with zoning including Lowrise Residential, Midrise Multifamily, and Neighborhood Commercial (NC2 and NC3). This would merge an existing commercial node around Pinehurst with an expanded residential mixed-use area closer to the station. See **Exhibit 2.4-25**.

Housing and job growth in the 130th Station Area would be greatest under Alternative 5, with more growth clustered in the newly designated urban center—1,644 additional housing units and 356 additional jobs would be added around 130th Street and 1,059 housing units and 648 jobs around 145th Street. Growth in the 145th Station Area would be similar to Alternative 2 in the newly designated neighborhood center. Growth would increase activity units from 18.4 (existing) to 35.5 around NE 130th Street and from 35.3 (existing) to 78.5 around 15th and 145th. See **Exhibit 2.4-23** and **Exhibit 2.4-24**.

Exhibit 2.4-23. Station Area Share of Targets, 2024-2044—Alternative 5: More and Distributed Growth

Location	Place Type*	Acres	New Housing Units	New Jobs	Activity Units (Existing)/Ac.	Activity Units (Future)/Ac.
NE 130th Street	Urban Center	218	1,644	356	18.4	35.5
15th & 145th	Neighborhood Center—Low Risk**	65	1,059	648	35.3	78.5

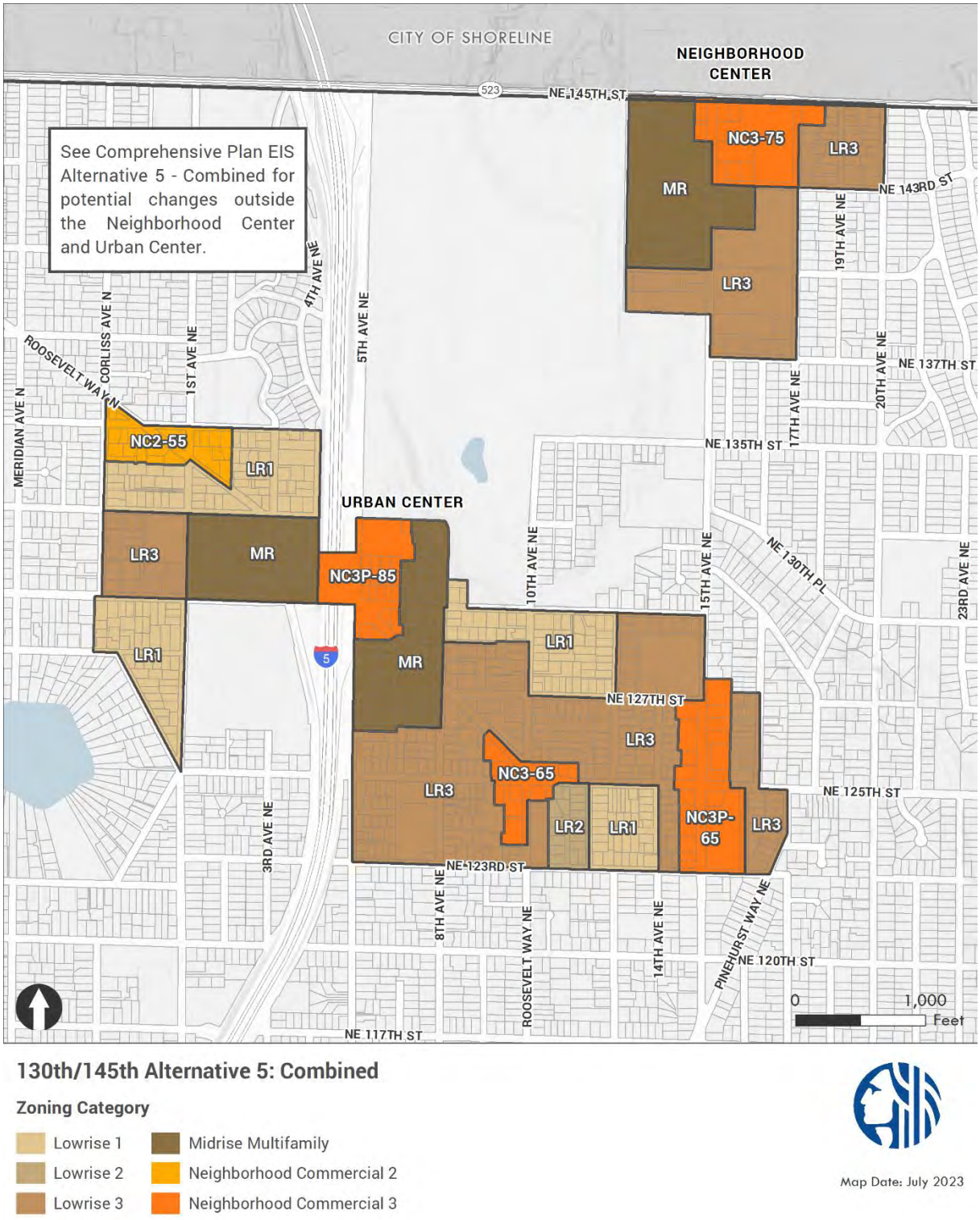
Notes: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under Alternatives 25. The 130th Street and Pinehurst Neighborhood Centers from Alternative 2 are both part of the 130th Street Urban Center in Alternative 5.
**Risk of displacement.
Source: City of Seattle, 2023; BERK, 2023.

Exhibit 2.4-24. 130th/145th Station Area Features—Alternative 5: More and Distributed Growth

Features	Alternative 5: More & Distributed Growth (aligns with citywide Alternative 5: Combined)*	Assumptions
Amount and Pattern of Growth	Potential new urban center and neighborhood center designations. Residential areas growth.	Growth in housing units: 2,703 Growth in jobs: 1,004 Activity units (people and jobs): ▪ 130th: 7,733, 35.5 per acre ▪ 145th: 5,117, 78.5 per acre
Building Types for New Construction	Denser than Alt 2 with more mixed-use buildings and more home type variety.	
Building Heights for New Construction	Greater than Alts 1 and 2.	Urban Center: 95 ft ~~Corridors~~Neighborhood Center: 40-80 feet Urban Neighborhood: 30 feet
Retail and Commercial	More retail and commercial locations	

Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Sources: City of Seattle; 2023; BERK, 2023.

Exhibit 2.4-25. 130th/145th Station Area Zoning Concepts—Alternative 5: Combined*



Notes: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Sources: City of Seattle, 2022; BERK, 2022.

2.4.6 Preferred Alternative

Note: This Preferred Alternative section was added since the Draft EIS.

Growth Strategy

The Preferred Alternative includes the Mayor's Recommended Growth Strategy reflected in the proposed One Seattle Comprehensive Plan and the One Seattle Zoning Update. These plans and implementing zoning consider the public comment during the Draft EIS and Draft Plan comment periods and public engagement opportunities. Studied growth, like Alternative 5, totals at 120,000 new dwellings (40,000 more than Alternative 1) and the same jobs of 158,000 jobs for the period 2024-2044. See **Exhibit 2.4-26**, **Exhibit 2.4-27**, and **Exhibit 2.4-28**.

The Preferred Alternative place types described in **Section 2.1** are implemented by One Seattle Zoning. The Preferred Alternative incorporates ideas developed in Alternatives 1–5. Notable features of this alternative include:

- Regional Centers (7) and Urban Centers (25)
  - Similar to Alternative 5, Ballard would become a regional center
  - Similar to Alternative 5, a new urban center is located at NE 130th Street Light Rail Station
  - Expansions are located at new light rail stations, in Squire Park, and in small centers. This includes expansion of the First Hill/Capitol Hill Regional Center and 23rd & Union–Jackson Urban Center.
- Neighborhood Centers (30)
  - Similar to Alternatives 2 and 5 there are 30 new neighborhood centers. This includes 5 that are expanded or shifted in comparison to Alternatives 2 and 5:
    - North Magnolia (was mostly neighborhood center and urban neighborhood under Alternative 5)
    - High Point (was mostly neighborhood center under Alternative 5)
    - Mid Beacon Hill (was mostly corridor under Alternative 5)
    - Upper Fremont (was mostly neighborhood center under Alternative 5)
    - Hillman City (was mostly corridor under Alternative 5)
  - Additionally, 1 neighborhood center is changed from an urban center considered under Alternatives 1–5 to a neighborhood center (South Park)
- Urban Neighborhood: The urban neighborhood place type is implemented with updated NR zoning to fulfill middle housing requirements in HB 1110 as well as implemented with upzones along frequent transit arterials. These middle housing concepts were part of Alternatives 3, 4 and 5 in particular, and transit focused corridors were part of Alternatives 4 and 5.
  - Similar to other action alternatives, the Preferred Alternative would allow unit lot subdivision in Neighborhood Residential zones.[9]

[9] A unit lot subdivision (ULS) creates new lots in a short plat process, except a ULS allows flexible application of zoning dimensional standards. They are one method for dividing multiple housing units on a parcel into individual unit lots for sale to individual owners, providing fee simple homeownership, such as condominium units and townhomes. See: https://deptofcommerce.app.box.com/s/8i72so6zaxmlnmds3kg0dte72g6eehze.

Growth is directed and supported by new plan elements addressing land use, housing, economic development, utilities, transportation, climate change and resiliency, and more. The long-term Seattle Transportation Plan concepts are implemented during the 20-year planning period by the Transportation Element and Capital Facilities Plan. The Seattle Transportation Plan EIS (February 2024) and this EIS consider these proposals in **Section 3.10 Transportation.**

Exhibit 2.4-26. Acres and Growth by Place Type—Preferred Alternative

Geography	Approximate Acres	Housing Estimate	Job Estimate
Regional Center	4,357	43,000	101,000
Urban Center (former Hub Urban Village)	1,579	8,340	7,645
Urban Center (former Residential Urban Village)	5,081	20,680	7,635
Manufacturing Industrial	5,825	800	18,800
Neighborhood Center[1]	1,601	11,560	5,510
Urban Neighborhood[1]	33,493	23,610	11,470
Frequent Transit Corridor[1]	1,572	12,010	5,940
Total	**53,508**	**120,000**	**158,000**
Outside Subareas—No Change to Place Type in All Alternatives[1,2]	3,854	5,598	9,617

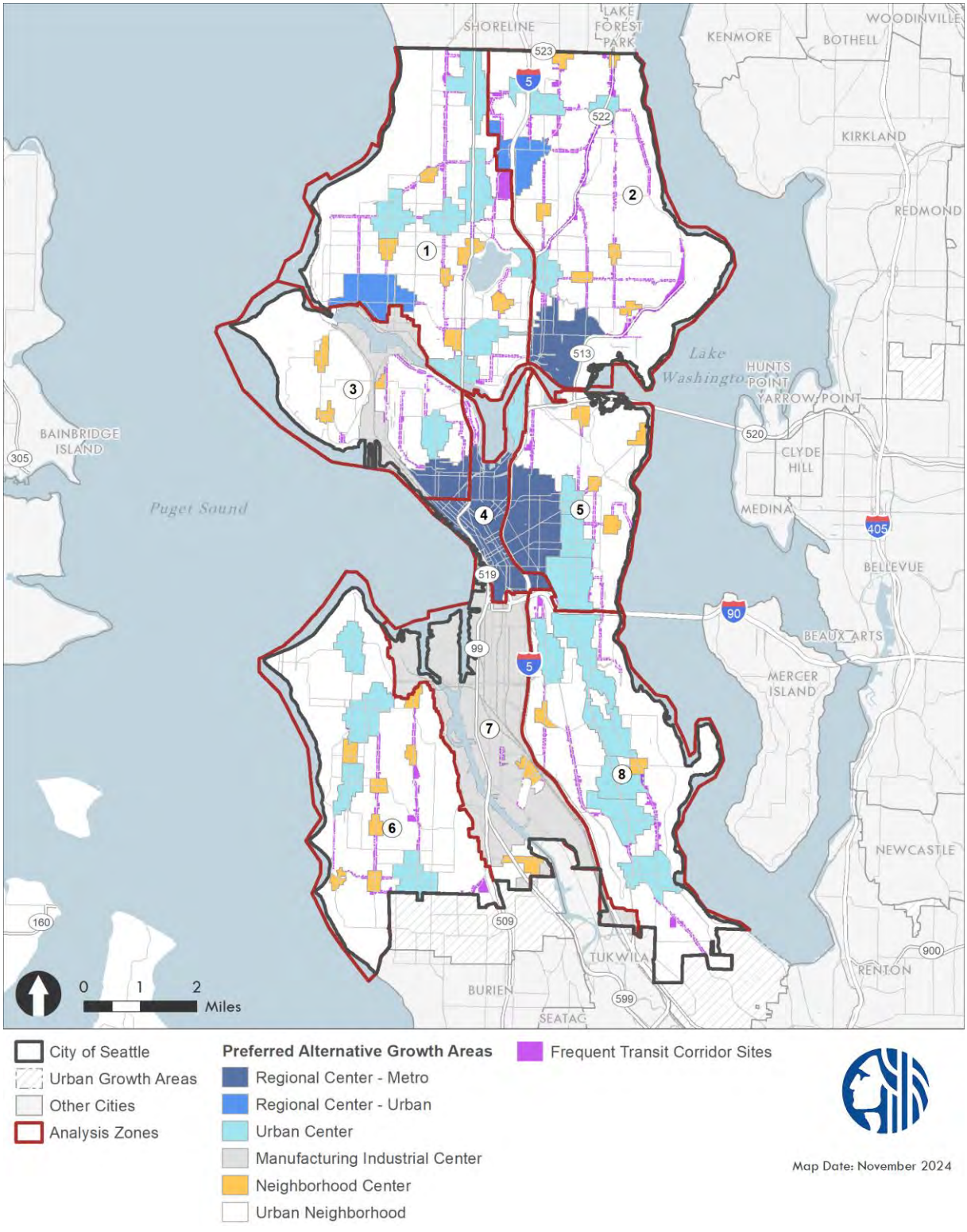
Note: See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other alternatives. Like Alternative 5, the Preferred Alternative assumes a small job shift from the larger centers towards other place types to reflect local demand with the distribution of new housing.
1 Areas with no change to place type under Alternatives 1-5 are part of the neighborhood center, urban neighborhood, or frequent transit corridor place types under the Preferred Alternative.
2 Under the Preferred Alternative, the same 3,854 acres as Alternatives 1-5 are technically classified as new place types. The potential for and extent of development in these areas under the Preferred Alternative would be similar to Alternatives 1-5 as no substantial shift is expected from currently allowed development patterns.
Source: City of Seattle, 2024; BERK, 2024.

Exhibit 2.4-27. Housing Growth by Location—Preferred Alternative

Geography	1	2	3	4	5	6	7	8	Total
Regional Center	6,000	6,000	3,500	18,000	9,500	—	—	—	**43,000**
Urban Center (former Hub Urban Village)	2,545	925	—	—	—	3,630	—	1,240	**8,340**
Urban Center (former Residential Urban Village)	4,320	2,965	900	1,010	3,985	2,145	—	5,355	**20,680**
Manufacturing Industrial Centers	—	—	300	—	—	—	500	—	**800**
Neighborhood Center	2,960	2,550	1,260	—	1,245	2,055	710	780	**11,560**
Urban Neighborhood	7,630	6,010	2,325	10	1,780	3,835	295	1,725	**23,610**
Frequent Transit Corridor	2,215	5,065	690	105	1,130	1,100	110	1,595	**12,010**
Total	**25,670**	**23,515**	**8,975**	**19,125**	**17,640**	**12,765**	**1,615**	**10,695**	**120,000**

Notes: See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other alternatives 2-5.
Source: City of Seattle, 2024; BERK, 2024.

Exhibit 2.4-28. Preferred Alternative Place Types



Note: No growth is assigned to public facilities under the Preferred Alternative (e.g., parks) even though they are shown as urban neighborhood on this map.
Source: City of Seattle, 2024; BERK, 2024.

The City has developed proposed legislation to implement middle housing and amend several Neighborhood Residential, Lowrise, and Midrise Zone. See **Appendix J** for more details on the proposed code revisions.

130th/145th Station Area

Under the Preferred Alternative, an urban center would be created straddling the west and east sides of I-5 at the Sound Transit light rail station at 130th with Low-rise Residential, Midrise Multifamily, and Neighborhood Commercial zoning. The 130th Station Area would see an increase in housing and job growth under the Preferred Alternative, similar to but slightly lower than Alternative 5. Similar to Alternatives 2 and 5, the 145th Station Area would be designated as a neighborhood center under the Preferred Alternative with similar zoning and housing growth and slightly fewer jobs. See **Exhibit 2.4-29**, **Exhibit 2.4-30**, and **Exhibit 2.4-31**.

Exhibit 2.4-29. Station Area Share of Targets, 2024-2044—Preferred Alternative

Location	Place Type*	Acres	New Housing Units	New Jobs	Activity Units (Existing)/Ac.**	Activity Units (Future)/Ac.**
NE 130th Street	Urban Center	217	1,500	360	17.3	33.2
15th & 145th***	Neighborhood Center	53	652	298	39.2	69.6

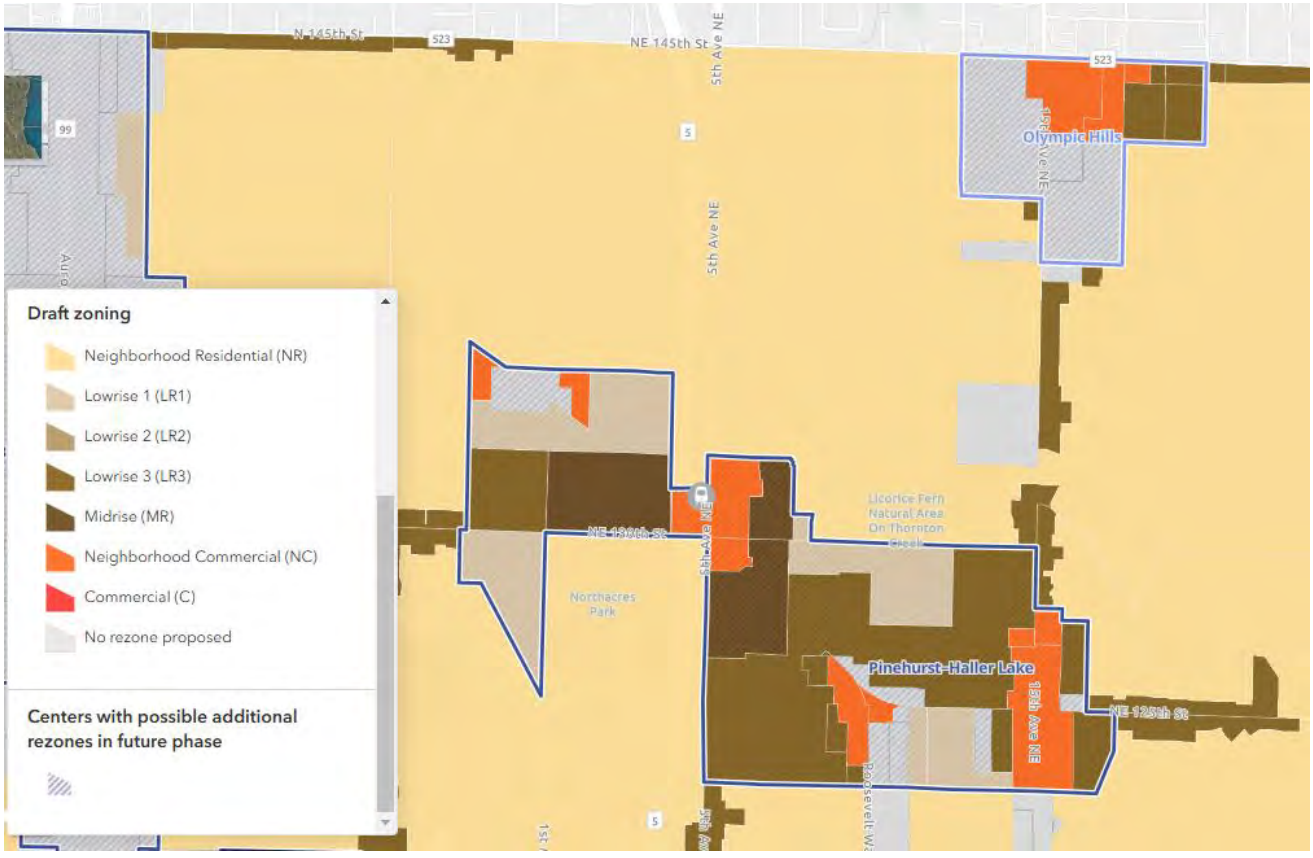
Notes: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under Alternatives 25. The 130th Street and Pinehurst Neighborhood Centers from Alternative 2 are both part of the 130th Street Urban Center in Alternative 5.
The Preferred Alternative uses updated and more detailed information to calculate existing and future activity units per acre for each center than Alternatives 1–5. Existing activity units per acre by center are based on OFM's 2023 SAEP April 1 census block estimate of total population and PSRC's 2023 estimate of all jobs (estimated by starting with ESD Q1 Covered Employment and estimating the remaining jobs not covered by unemployment insurance) within the revised center boundaries of the Preferred Alternative. Future 2044 population by center was calculated using OFM's 2023 housing unit estimate, additional housing unit permits issued between April 1, 2023 and June 1, 2024 (since the 2023 OFM estimate), a citywide household occupancy rate of 93%, estimated existing people per household by center (per OFM's 2023 household and population estimates), and housing unit growth targets. Future 2044 jobs by center were calculated using PSRC's 2023 covered employment estimate and job growth targets. Future 2044 activity units per acre for each center are based on the combined estimated 2044 population and jobs and acres within each center (including revised center boundaries under the Preferred Alternative). See **Appendix B.
***Renamed Olympic Hills under the Preferred Alternative.
Source: OFM, 2023 (estimates of 2023 housing, households, household population, and group quarter population are from OFM's SAEP April 1 census block estimates); PSRC, 2023; City of Seattle, 2024; BERK, 2024.

Exhibit 2.4-30. 130th/145th Station Area Features—Preferred Alternative

Features	Preferred Alternative	Assumptions
Amount and Pattern of Growth	Potential new urban center and neighborhood center designations. Residential areas growth.	Similar to Alternative 5. Growth in housing units: 2,152 Growth in jobs: 658 Activity units (people and jobs): ▪ 130th: 7,210, 33.2 per acre ▪ 145th: 3,692, 69.6 per acre
Building Types for New Construction	Denser than Alt 2 with more mixed-use buildings and more home type variety. Similar to Alternative 5.	
Building Heights for New Construction	Greater than Alternatives 1 and 2. Similar to Alternative 5.	Urban Center: 85 ft Neighborhood Center: 40-75 feet Urban Neighborhood: 32 feet
Retail and Commercial	More retail and commercial locations	

Note: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other alternatives.
Sources: City of Seattle; 2024; BERK, 2024.

Exhibit 2.4-31. 130th/145th Station Area Zoning Concepts—Preferred Alternative*



Notes: *See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other alternatives.
Sources: City of Seattle, 2024.

2.4.7 Summary of Alternatives

Exhibit 2.4-32 summarize the alternatives studied in this EIS.

Exhibit 2.4-32. Summary of Alternatives and Place-Based Growth and Form—Citywide

Alternative*	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Addresses Periodic Update Policies and Code	2035 Comprehensive Plan and current municipal code continues. Housing and job growth targets for 2044 can be met.	New One Seattle Plan prepared. Housing and job growth targets for 2044 can be met and higher housing assists in affordability targets and housing costs.	New One Seattle Plan prepared. Housing and job growth targets for 2044 can be met and higher housing assists in affordability targets and housing costs.	New One Seattle Plan prepared. Housing and job growth targets for 2044 can be met and higher housing assists in affordability targets and housing costs.	New One Seattle Plan prepared. Housing and job growth targets for 2044 can be met and higher housing assists in affordability targets and housing costs.	New One Seattle Plan prepared. Housing and job growth targets for 2044 can be met and higher housing assists in affordability targets and housing costs.
Description of Growth Estimates and Housing	Current plan is retained, and growth occurs under current policies but to the level of 2044 targets.	Allows more housing around existing neighborhood business districts.	Wider range of low-scale housing options in all NR zones.	Allow a wide range of housing types closer to transit in areas currently zoned exclusively for detached homes.	Combination of Alts 2-4.	Combination of Alts 2-5. Housing allowed in all place types including centers and corridors, and NR zones.
New Place Types and Areas of Change	None	Neighborhood center	Urban neighborhood	Corridor	Neighborhood centers, urban neighborhood, corridors, and select regional centers and urban centers	Neighborhood centers, urban neighborhood, corridors, and select regional centers and urban centers
Location of Changes	Per adopted plans. Growth strategy is retained with focus on urban centers and villages.	Generally within 1,000-foot radius (~ 3-4 blocks) of certain neighborhood business districts, trimmed to prevent overlap with industrial zoning or other growth areas.	All NR zones.	Near frequent transit and amenities. Within a 10-minute walk from a light rail station or a 5-minute walk from frequent BRT or entrances to large parks. Includes about 50% of areas currently zoned NR.	Combination of Alts 2-4.	Combination of Alts 2-5. Housing allowed in all place types including centers and corridors, and NR zones.
Uses in new place types and areas of change	N/A	Mix of residential and mixed-use development in neighborhood centers.	Still primarily residential in urban neighborhood zones with more flexibility for corner stores and home businesses.	Primarily residential in corridors with commercial along major streets.	Combination of Alts 2-4.	Combination of Alts 2-5.

Alternative*	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Common Housing Types in new place types and areas of change	N/A	▪ Duplex, triplex, and fourplex ▪ Townhouse & rowhouse ▪ Sixplex/3-story stacked flats ▪ 4- to 5-story buildings ▪ 6- to 7-story buildings	▪ Detached home ▪ Duplex, triplex, and fourplex ▪ Townhouse & rowhouse ▪ Sixplex/3-story stacked flats	▪ Detached home ▪ Duplex, triplex, and fourplex ▪ Townhouse & rowhouse ▪ Sixplex/3-story stacked flats ▪ 4- to 5-story buildings ▪ 6- to 7-story buildings	▪ Detached home ▪ Duplex, triplex, and fourplex ▪ Townhouse & rowhouse ▪ Sixplex/3-story stacked flats ▪ 4- to 5-story buildings ▪ 6- to 7-story buildings	▪ Detached home ▪ Duplex, triplex, and fourplex ▪ Townhouse & rowhouse ▪ Sixplex/3-story stacked flats ▪ 4- to 5-story buildings ▪ 6- to 7-story buildings
Base Heights	Urban centers: from 4-story to high-rise buildings (above 12 stores). Urban villages: from townhouse/ rowhouse to 12-story buildings. Neighborhood residential: 3-story buildings.	Up to 7 stories in neighborhood centers. No change to urban centers/village boundaries but place names change to regional center and urban center.	Market-rate development will continue to have a 3-story height limit, consistent with current rules in NR zones. No change to urban centers/village boundaries but place names change to regional center and urban center.	Up to 5 stories in most of corridors with potential for up to 7 stories in areas already zoned for Commercial or Multifamily. No change to urban centers/village boundaries but place names change to regional center and urban center.	Combination of Alts 2-4. Additional height up to 5 stories within expanded boundary of regional/urban centers.	Combination of Alts 2-5.
Bonuses	Per current code.	Per current code.	Potential height, floor area, or density bonuses for affordable housing projects in NR zones	Per current code.	Potential height, floor area, or density bonuses for affordable housing projects citywide.	Potential height, floor area, or density bonuses for affordable housing projects citywide.
Regional Center and Urban Center Boundaries	No change.	No change.	No change.	No change.	Designate Ballard as a regional center. Expand boundary of 7 regional/urban centers to include a 10-minute (½-mile) walkshed from their central point or light rail station. New 130th Station Area Urban Center (see below).	Designate Ballard as a regional center. Expanded boundaries in Squire Park and in small centers. Thirty new neighborhood centers including 5 expanded or shifted compared to Alts 2, 4, and 5. South Park redesignated as a neighborhood center. New 130th Station Area Urban Center (see below).

Alternative*	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
130th/145th Station Area	No change.	Neighborhood centers with LR, MR, and NC3 zoning.	Develop consistent with the citywide framework.	Develop consistent with the citywide framework.	130th Station Area Urban Center with LR, MR, and NC2/3 zoning. 145th Station Area similar to Alt 2.	130th Station Area Urban Center with LR, MR, and NC2/3 zoning. 145th Station Area similar to Alt 2.
MICs	Incorporates changes proposed as part of the recent Industrial and Maritime Strategy EIS.	Same as Alt 1.	Same as Alt 1.	Same as Alt 1.	Same as Alt 1.	Same as Alt 1.

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
*Alternative 1, No Action, would retain the City's Seattle 2035 urban village strategy and center/village designations—the existing urban centers and villages are categorized here according to the new place types proposed under Alternatives 2–5 for comparison purposes only. Ballard would remain a "hub urban village" under Alternative 1, would be called an "urban center" under Alternatives 2-5, and would be redesignated as a regional center (as shown here) under Alternative 5. See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Alternative 1 No Action, studies the impact of adding 80,000 new homes and 158,000 jobs over 20 years, based on growth targets adopted by the King County Growth Management Council.[10] Alternatives 2, 3, and 4 study a total housing growth of 100,000 housing units (20,000 more than Alternative 1 No Action) to account for the potential additional housing that could occur within neighborhood centers, urban neighborhood areas, or corridors. Alternative 5 and the Preferred Alternative assumes growth of 120,000 housing units (40,000 more than the No Action Alternative) to account for the potential additional housing that could occur within the areas of change identified in Alternatives 2, 3, and 4 as well as changes to existing and new centers. All alternatives assume the same overall growth in jobs. See **Exhibit 2.4-33**.

Exhibit 2.4-33. 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
Housing	80,000	100,000	100,000	100,000	120,000	120,000
Jobs	158,000	158,000	158,000	158,000	158,000	158,000

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

[10] Growth targets were set for the years 2019-2044, but in the EIS have been adjusted to match the required 20-year planning period for 2024-2044, to account for population, housing, and employment change for the years 2019-2023.

Under all alternatives, 80,000 units would be located in a similar distribution to Alternative 1, primarily in existing centers. Under the action alternatives, 20,000 or 40,000 additional housing units would be accommodated within new place types located throughout the city. This results in a shift in the percentage share of growth among study areas. For example, while absolute housing growth in Downtown/South Lake Union (Area 4) is constant at 19,413 housing units, the percent share of housing growth in Area 4 is lower under all the action alternatives than the No Action Alternative. Under Alternative 5 and the Preferred Alternative, both Areas 1 and 2 in North Seattle receive greater percent share of housing growth than Area 4. The Preferred Alternative includes less housing in Area 7 with South Park being designated a neighborhood center rather than an urban center. The expected growth distribution reflects zoning and capacity. **Exhibit 2.4-35**~~Exhibit 1.4-7~~ and **Exhibit 2.4-36** show percent share of housing ~~target~~ growth by study area and alternative, with the two highest study area percent shares under each alternative highlighted orange.

Exhibit 2.4-34. Housing Growth Estimates Percent Share by Study Area—Citywide Alternatives

Study Area	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Preferred
Area 1 Northwest	17.2%	18.4%	17.6%	17.2%	17.9%	21.4%
Area 2 Northeast	16.0%	18.3%	20.2%	21.0%	19.6%	19.6%
Area 3 West	7.5%	8.1%	6.7%	6.6%	6.8%	7.5%
Area 4 Downtown/South Lake Union	24.3%	19.4%	19.4%	19.4%	16.2%	15.9%
Area 5 East	16.6%	16.3%	13.8%	13.8%	13.4%	14.7%
Area 6 Southwest	7.7%	9.4%	10.2%	10.1%	11.5%	10.6%
Area 7 Duwamish Manufacturing Center	2.4%	2.3%	1.9%	2.0%	3.0%	1.3%
Area 8 Southeast	8.3%	7.9%	10.2%	9.9%	11.6%	8.9%
Total	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**

Note: The two highest percent shares under each alternative by study area are highlighted orange. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

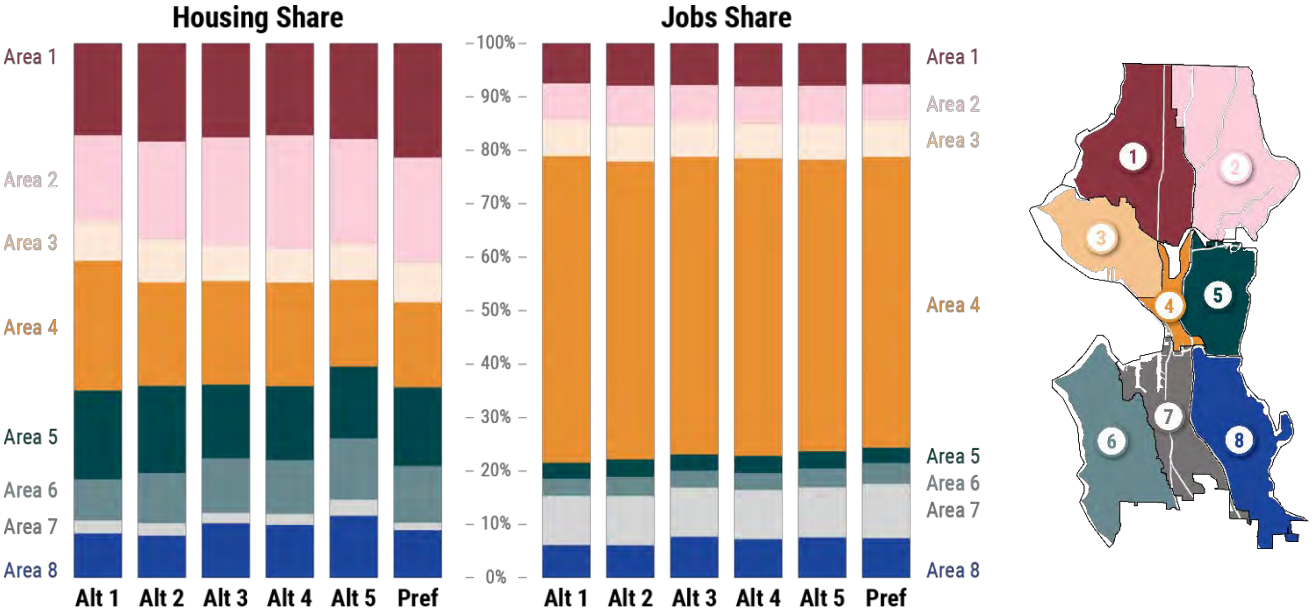
All alternatives assume the same overall growth in jobs with a little over half of job growth in Downtown/South Lake Union (Area 4) and about 9% in the Duwamish Manufacturing Center (Area 7). Alternatives 2, 3, and 4 assume a small job shift from the larger centers towards other place types to reflect local demand consistent with the distribution of new housing. The distribution of jobs and housing under Alternative 5 would be a combination of the other alternatives after accounting for expanded regional and urban center boundaries and potential changes to place type designations. The Preferred Alternative similarly focuses the bulk of jobs in Areas 4 and 7 with slight shifts in jobs based on an evaluation of capacity and zoning. See **Exhibit 2.4-35** and **Exhibit 2.4-36**.

Exhibit 2.4-35. Job Growth Estimates Percent Share by Study Area—Citywide Alternatives

Study Area	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Preferred
Area 1 Northwest	7.5%	7.9%	7.8%	8.1%	7.9%	7.6%
Area 2 Northeast	6.9%	7.4%	6.9%	6.9%	7.2%	6.7%
Area 3 West	6.7%	6.9%	6.6%	6.6%	6.7%	6.9%
Area 4 Downtown/South Lake Union	57.4%	55.7%	55.7%	55.7%	54.6%	54.4%
Area 5 East	3.0%	3.3%	3.1%	3.2%	3.2%	2.9%
Area 6 Southwest	3.2%	3.5%	3.2%	3.2%	3.5%	3.9%
Area 7 Duwamish Manufacturing Center	9.2%	9.2%	9.2%	9.2%	9.3%	10.1%
Area 8 Southeast	6.1%	6.1%	7.7%	7.2%	7.6%	7.4%
Total	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**	**100.0%**

Note: The two highest percent shares under each alternative by study area are highlighted orange. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Exhibit 2.4-36. Comparison of Housing and Jobs Growth Estimates Percent Share by Study Area—Citywide Alternatives



Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Exhibit 2.4-37 and **Exhibit 2.4-38** compare estimated total housing units and jobs by center.[11]

[11] Note that the Preferred Alternative uses updated and more detailed information to estimate existing (2024) and future (2044) housing units than Alternatives 1–5. See the note under **Exhibit 2.4-37** and **Exhibit 2.4-38** and **Appendix B** for more detail.

Exhibit 2.4-37. Comparison of Estimated Total Housing Units by Center—Citywide Alternatives

Center[1]	Existing (Draft EIS)[4]	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Existing (Pref.)[4]	Preferred[4]
Regional Centers								
Downtown	34,696	48,354	48,354	48,354	48,354	48,354	34,862	48,362
First Hill/Capitol Hill	40,139	49,200	49,200	49,200	49,200	49,200	43,861	53,361
University Community	11,792	15,654	15,654	15,654	15,654	15,654	15,743	19,743
South Lake Union	11,199	15,806	15,806	15,806	15,806	15,806	11,627	16,127
Uptown	8,837	12,432	12,432	12,432	12,432	12,471	11,392	14,892
Northgate	5,171	7,358	7,358	7,358	7,358	7,358	5,274	7,274
Hub Urban Centers								
Ballard[2]	12,259	17,301	17,301	17,301	17,301	18,301	12,465	18,465
Bitter Lake Village	3,439	4,448	4,448	4,448	4,448	4,448	3,997	5,007
Fremont	3,990	5,527	5,527	5,527	5,527	5,527	4,418	5,953
Lake City	2,834	3,761	3,761	3,761	3,761	3,761	3,375	4,300
Mt Baker	4,295	5,537	5,537	5,537	5,537	5,537	4,320	5,560
West Seattle Junction	6,452	9,580	9,580	9,580	9,580	9,592	7,662	11,292
Residential Urban Centers								
130th Street[2]	1,436	1,630	2,485	NA	NA	3,080	1,489	2,989
23rd & Union-Jackson[3] *Central District* *Judkins Park*	8,577	10,554	10,554	10,554	10,554	10,554	— *3,317* *7,230*	— *4,687* *8,630*
Admiral	1,265	1,680	1,680	1,680	1,680	2,110	2,107	3,022
Aurora-Licton Springs	4,268	5,220	5,220	5,220	5,220	5,220	4,268	5,218
Columbia City	4,023	5,507	5,507	5,507	5,507	5,507	4,462	5,947
Crown Hill	2,636	3,279	3,279	3,279	3,279	3,279	2,984	3,629
Eastlake	4,090	5,100	5,100	5,100	5,100	5,100	4,566	5,576
Green Lake	2,791	3,600	3,600	3,600	3,600	3,600	2,777	3,587
Greenwood-Phinney Ridge	2,546	3,047	3,047	3,047	3,047	3,063	3,404	4,404
Madison-Miller	3,770	4,986	4,986	4,986	4,986	4,986	3,822	5,037
Morgan Junction	1,549	1,878	1,878	1,878	1,878	2,988	2,325	3,155
North Beacon Hill	3,138	3,620	3,620	3,620	3,620	3,620	3,329	3,809
Othello[3] *Graham* *Othello*	4,357	5,486	5,486	5,486	5,486	7,005	— *1,519* *4,348*	— *2,996* *4,887*
Rainier Beach	2,365	2,739	2,739	2,739	2,739	4,489	2,517	3,892
Roosevelt	3,540	5,006	5,006	5,006	5,006	5,006	4,586	6,051
South Park[3]	1,368	1,627	1,627	1,627	1,627	3,027	NA	NA
Upper Queen Anne	1,564	1,966	1,966	1,966	1,966	1,993	3,007	3,907
Wallingford	3,425	4,342	4,342	4,342	4,342	4,342	3,965	4,880
Westwood-Highland Park	2,486	2,885	2,885	2,885	2,885	3,086	2,605	3,005
MICs								
Ballard-Interbay-Northend	138	766	766	766	766	766	651	951
Greater Duwamish	204	1,052	1,052	1,052	1,052	1,052	446	946

1 Organized by proposed place type under the action alternatives. See **Exhibit 2.1-1** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~Alternatives 2–5~~.
2 Ballard would be redesignated as a regional center and a new urban center created at 130th Street under Alternative 5 and the Preferred Alternative.
3 Under the Preferred Alternative, 23rd & Union Jackson and Othello would be split into two urban centers each (Central District, Judkins Park, Othello, and Graham) and South Park would be redesignated as a neighborhood center.
4 The Preferred Alternative uses updated and more detailed information to estimate existing and future housing units than Alternatives 1–5. Existing housing units for the Draft EIS are estimated from 2022 data from OFM and the existing center boundaries. Under the Preferred Alternative, 2024 housing units by center were estimated using OFM's 2023 housing unit estimates and additional housing unit permits issued between April 1, 2023 and June 1, 2024 (since the 2023 OFM estimate) within the Preferred Alternative revised center boundaries. Future 2044 housing units for the Preferred Alternative are the 2024 base estimate plus housing growth targets. See **Appendix B**.
Sources: OFM SAEP April 1 census block estimates, 2022 and 2023; City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Exhibit 2.4-38. Comparison of Estimated Total Jobs by Center—Citywide Alternatives

Center[1]	Existing (Draft EIS)[4]	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Existing (Pref.)[4]	Preferred[4]
Regional Centers								
Downtown	288,234	351,383	349,489	349,489	349,489	348,226	187,799	247,799
First Hill/Capitol Hill	45,527	48,886	48,785	48,785	48,785	48,718	50,654	53,654
University Community	16,911	20,799	20,682	20,682	20,682	20,605	36,741	40,241
South Lake Union	57,498	84,563	83,751	83,751	83,751	83,210	77,542	103,042
Uptown	25,643	28,289	28,210	28,210	28,210	28,157	15,174	17,674
Northgate	13,010	15,862	15,776	15,776	15,776	15,719	10,222	12,722
Hub Urban Centers								
Ballard[2]	8,434	12,563	12,439	12,439	12,439	12,531	8,430	12,430
Bitter Lake Village	8,965	11,029	10,967	10,967	10,967	10,926	4,142	6,207
Fremont	7,251	7,562	7,553	7,553	7,553	7,546	7,552	7,862
Lake City	2,387	3,009	2,990	2,990	2,990	2,978	1,379	1,999
Mt Baker	8,884	11,937	11,845	11,845	11,845	11,784	5,236	8,286
West Seattle Junction	5,745	7,342	7,288	7,288	7,288	7,271	4,879	6,479
Residential Urban Centers								
130th Street[2]	1,062	1,171	1,346	NA	NA	1,418	494	854
23rd & Union-Jackson[3] *Central District* *Judkins Park*	6,765	7,444	7,424	7,424	7,424	7,410	— *1,180* *5,037*	— *1,312* *5,585*
Admiral	2,249	2,499	2,492	2,492	2,492	2,560	2,100	2,350
Aurora-Licton Springs	5,679	6,095	6,083	6,083	6,083	6,074	2,653	3,068
Columbia City	3,105	4,153	4,122	4,122	4,122	4,101	3,301	4,351
Crown Hill	1,459	1,787	1,777	1,777	1,777	1,771	1,181	1,511
Eastlake	5,601	5,882	5,874	5,874	5,874	5,868	6,318	6,598
Green Lake	1,953	2,120	2,115	2,115	2,115	2,112	1,879	2,049
Greenwood-Phinney Ridge	2,737	3,320	3,301	3,300	3,300	3,300	2,207	2,792
Madison-Miller	1,759	2,147	2,135	2,135	2,135	2,128	1,978	2,358
Morgan Junction	690	861	856	856	856	1,044	861	1,031
North Beacon Hill	1,073	1,775	1,754	1,754	1,754	1,740	1,424	2,124
Othello[3] *Graham* *Othello*	2,892	3,234	3,257	3,257	3,257	3,534	— *894* *886*	— *1,123* *997*
Rainier Beach	3,119	3,400	3,392	3,392	3,392	3,690	1,106	1,386
Roosevelt	3,191	3,557	3,546	3,546	3,546	3,539	1,959	2,324
South Park[2]	1,075	1,525	1,512	1,512	1,512	1,746	NA	NA
Upper Queen Anne	1,503	1,784	1,776	1,776	1,776	1,770	2,608	2,888
Wallingford	3,847	4,373	4,357	4,357	4,357	4,347	2,888	3,413
Westwood-Highland Park	2,572	3,048	3,034	3,034	3,034	3,059	1,613	2,088
MICs								
Ballard-Interbay-Northend	17,377	23,477	23,477	23,477	23,477	23,477	17,942	24,042
Greater Duwamish	61,917	74,617	74,617	74,617	74,617	74,617	66,631	79,331

1 Organized by proposed place type under the action alternatives. See **Exhibit 2.1-1** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~Alternatives 2–5~~.
2 Ballard would be redesignated as a regional center under Alternative 5 and the Preferred Alternative.
3 Under the Preferred Alternative, 23rd & Union Jackson and Othello would be split into two urban centers each (Central District, Judkins Park, Othello, and Graham) and South Park would be redesignated as a neighborhood center.
4 The Preferred Alternative uses updated and more detailed information to estimate existing and future jobs than Alternatives 1–5. Existing jobs for the Draft EIS were estimated based on summarized data from PSRC and the existing center boundaries (e.g., these are not based on site level data and are used as estimates for comparing the alternatives only). Under the Preferred Alternative, 2023 existing jobs by center are based on PSRC's covered employment estimates within the Preferred Alternative revised center boundaries. Future 2044 jobs for the Preferred Alternative are the 2023 PSRC estimate plus job growth targets. See **Appendix B**.
Sources: PSRC, 2023; City of Seattle, 2024~~3~~; BERK, 2024~~3~~.



Sidewalk with landscaped buffer along Meridian Ave N at N 140th Street. Source: City of Seattle 130th and 145th Station Area Planning Multimodal Mobility Study, December 2020.

130th/145th Station Area

Exhibit 2.4-39~~Exhibit 1.4-10~~ summarizes the land use concepts under the Alternative 1~~,~~ No Action, and the ~~two~~ three alternatives that have a more detailed approach in the 130th/145th Station Area. Alternative 1 retains the current Comprehensive Plan and zoning designations. No new areas would be designated for mixed-use or higher density, and building types outside existing commercial zoning would remain primarily detached homes with some 4- 8-story multifamily uses near the 145th BRT station. Under Alternatives 3 and 4, changes in the 130th/145th station areas would be consistent with the changes described citywide. Under Alternative 2, three neighborhood centers would be designated in the station areas with Low-rise Residential, Midrise Residential, and Neighborhood Commercial (NC3) zoning. Compared to Alternative 1, development under Alternative 2 would be more mixed use near the 145th Station Area and to the east of I-5 in the 130th Station Area (including both the 130th Street and Pinehurst centers). Most of the housing proposed under Alternative 2 would be near the 145th Station Area and job growth would be modest. Under Alternative 5 and the Preferred Alternative, an urban center would be created on both the west and east sides of I-5 at the Sound Transit light rail station at 130th with Low-rise Residential, Midrise Multifamily, and Neighborhood Commercial (2 and 3) zoning. The 130th Station Area would see the greatest increase in housing and job growth under Alternative 5 and the Preferred Alternative. Similar to Alternative 2, the 145th Station Area would be designated as neighborhood center under Alternative 5 and the Preferred Alternative with similar zoning and housing growth and slightly fewer jobs. Key policy issues are described under Alternative 2.

Exhibit 2.4-39. Summary of Alternatives—130th/145th Station Areas

Feature	Alternative 1: No Action (aligns with citywide Alt 1)*	Alternative 2: Focused (aligns with citywide Alt 2)*	Alternative 5: More & Distributed Growth (aligns with citywide Alt 5)*	Preferred Alternative
Amount** and Pattern of Growth	Baseline growth and pattern. Growth in housing units: 840 Growth in jobs: 716	Cluster growth in newly designated small mixed-use node(s) and near transit. Growth in housing units: 2,208 Growth in jobs: 979	Potential new uUrban center and corridor designations. Residential areas growth. Growth in housing units: 2,703 Growth in jobs: 1,004	Similar to Alt 5.with regard to designations and pattern. Growth in housing units: 2,152 Growth in jobs: 658
Building Types for New Construction	No change (single family, accessory dwelling units, limited multifamily and mixed use).	Denser and taller buildings in nodes. More mixed-use buildings.	Denser than Alt 2 with more mixed-use buildings and more home type variety.	Similar to Alt 5.
Building Heights for New Construction	No change Multifamily and mixed use: 45–80 ft Neighborhood Residential: 30 ft	Nodes: Potentially up to 40 – 80 ft	Urban Center: 95 ft Neighborhood CenterCorridors: Potentially up to 40-80 ft Urban Neighborhood: Same as Alt 1 or 2	Urban Center: 85 ft Neighborhood Center: 40-75 feet Urban Neighborhood: 32 feet
Retail and Commercial	No change	Could include more retail and commercial locations than Alt 1	More retail and commercial locations than Alt 2	Similar to Alt 5.

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—a minor correction made to Alternatives 5 is shown in tracks.

* Alternative 1, No Action, would retain the City's Seattle 2035 urban village strategy and center/village designations—the existing urban centers and villages are categorized here according to the new place types proposed under Alternatives 2-5 and the Preferred Alternative for comparison purposes only. See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other aAlternatives 2-5

** The growth estimates consider the current zoning within a common maximum boundary (Alternative 5 and the Preferred Alternative). The 130th Street and Pinehurst Neighborhood Center from Alternative 2 are both within the 130th Street Urban Center boundary in Alternative 5 and the Preferred Alternative.

Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.



University Community. Source: City of Seattle, 2023.

2.4.8 Transportation Planning & Alternatives

As described in the One Seattle EIS Scoping Notice in 2022, the One Seattle Comprehensive Plan EIS is intended to evaluate the effect of the Comprehensive Plan land use and growth on the transportation system and identify impacts and mitigation. The Seattle Transportation Plan (STP) process provides a separate EIS to test multimodal transportation system changes.

The One Seattle Comprehensive Plan Update Draft EIS evaluated~~s~~ the effect of the Comprehensive Plan land use and growth on the city's transportation system holding the network constant to adopted plans (the No Action network), and it identifies associated impacts and potential mitigation measures.

The STP provides a separate EIS to test multimodal transportation system changes. The STP considers how the level of investment in infrastructure for people walking, biking, and riding transit could improve transportation outcomes. Network alternatives under consideration in the STP EIS include:

- No Action: Reflects currently adopted transportation plans.
- Moderate Pace: This alternative envisions a future with moderate growth in funding for new multimodal infrastructure in Seattle's transportation system.
- Rapid Progress: This alternative envisions a future with strong growth in funding for expanded and enhanced multimodal infrastructure in Seattle's transportation system.

The City issued a Draft EIS for the STP with its own comment period followed by a Final EIS (see Seattle Transportation Plan website at https://seattle.gov/transportation/projects-and-programs/programs/seattle-transportation-plan). The STP EIS tests the same Alternative 1 and Alternative 5 growth alternatives in relation to the alternative multimodal networks to consider the potential network in relation to a range of growth to identify an optimal network that advances city multimodal goals and objectives.

With the Final EIS, an updated proposed network is evaluated both with the No Action Alternative and the Preferred Alternative. The long-term Seattle Transportation Plan concepts are implemented during the 20-year planning period by the Transportation Element and Capital Facilities Plan. This Final EIS considers these proposals in **Section 3.10 Transportation.**

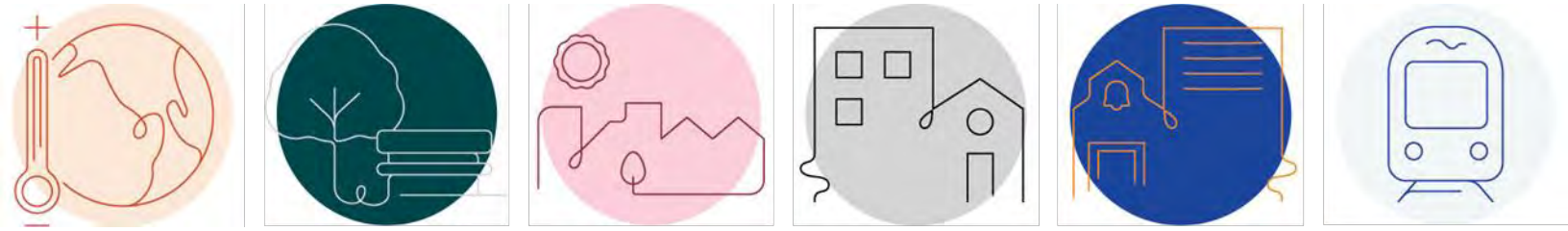
2.5 Benefits & Disadvantages of Delaying the Proposed Action

The benefits of delaying the proposed action are to retain a growth strategy that meets the minimum growth targets, which would create less capacity for housing and potentially less conversion of tree canopy. There would also be a lower demand for public services and utilities, and less reduction in travel time on the transportation system.

The disadvantages of delaying the proposal would include less housing capacity and future housing supply, potential continued pressure on the housing market, and lack of consistency with affordable housing targets. There would be less consistency with State requirements to address racial disparities and undo harm, particularly in creating housing opportunities including ownership housing. A capital facilities plan would not be updated to direct resources to address demand due to growth, or to address emerging needs for climate adaptation.

If growth is more restricted in Seattle and otherwise occurs in the region, this could result in impacts to air quality and greenhouse gas emissions, greater energy consumption, erosion of ecosystem functions and pressure on natural resources, and other impacts identified in VISION 2050. With more dispersed regional growth there could be greater household transportation costs and costs to extend utility infrastructure.

3 ENVIRONMENT, IMPACTS, & MITIGATION MEASURES





Source: City of Seattle, 2023.

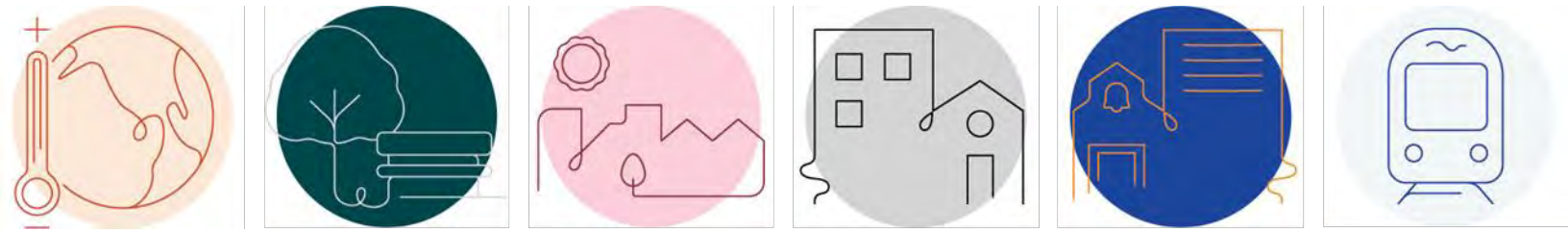
This chapter describes the affected environment, potential impacts, and mitigation measures for the following topics:

- **Section 3.1 Earth & Water Quality**
- **Section 3.2 Air Quality & GHG Emissions**
- **Section 3.3 Plants & Animals**
- **Section 3.4 Energy & Natural Resources**
- **Section 3.5 Noise**
- **Section 3.6 Land Use Patterns & Urban Form**
- **Section 3.7 Relationship to Plans, Policies, & Regulations**
- **Section 3.8 Population, Housing, & Employment**
- **Section 3.9 Cultural Resources**
- **Section 3.10 Transportation**
- **Section 3.11 Public Services**
- **Section 3.12 Utilities**

Following a description of current conditions (affected environment), the analysis compares and contrasts the alternatives and provides mitigation measures for identified impacts. It also summarizes whether there are significant unavoidable adverse impacts.

The analysis is broad, areawide, and comparative, considering the non-project proposals (WAC 197-11-442). Where there is a potential for more than a moderate adverse impact on environmental quality (WAC 197-11-794), existing or potential mitigation measures are posed. Consistent with the non-project analysis, mitigation measures are policy, plan, regulation, or program activities that the City could undertake to limit impacts.

3.1 Earth & Water Quality





Source: City of Seattle, 2023.

This section discusses critical land areas and water resources in the study area, including:

- Landslide hazard areas
- Steep slopes
- Potential soil settlement areas
- Surface waters (streams, lakes, and marine waters)
- Shorelines
- Groundwater

Thresholds of significance of this earth and water resources impact analysis involve comprehensive planning changes that could result in the following:

- Runoff Increases: Impervious surface expansions that would increase 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 Recharge: Impervious surface expansions that would decrease groundwater recharge beyond designated limits;
- Groundwater Quality: increases in amount of pollution discharged to levels that would contaminate groundwater supplies;
- Environmental Earth and Soil Hazards: Disturbances of existing contaminated areas to levels that could endanger human health or the environment;
- Climate Change—Extreme Precipitation: Growth concentrated into areas that are reasonably expected to be at risk for future flooding and landslides; and
- Climate Change—Sea-level Rise: Growth concentrated into areas that are reasonably expected to be at risk for future sea-level rise.

3.1.1 Affected Environment

Citywide

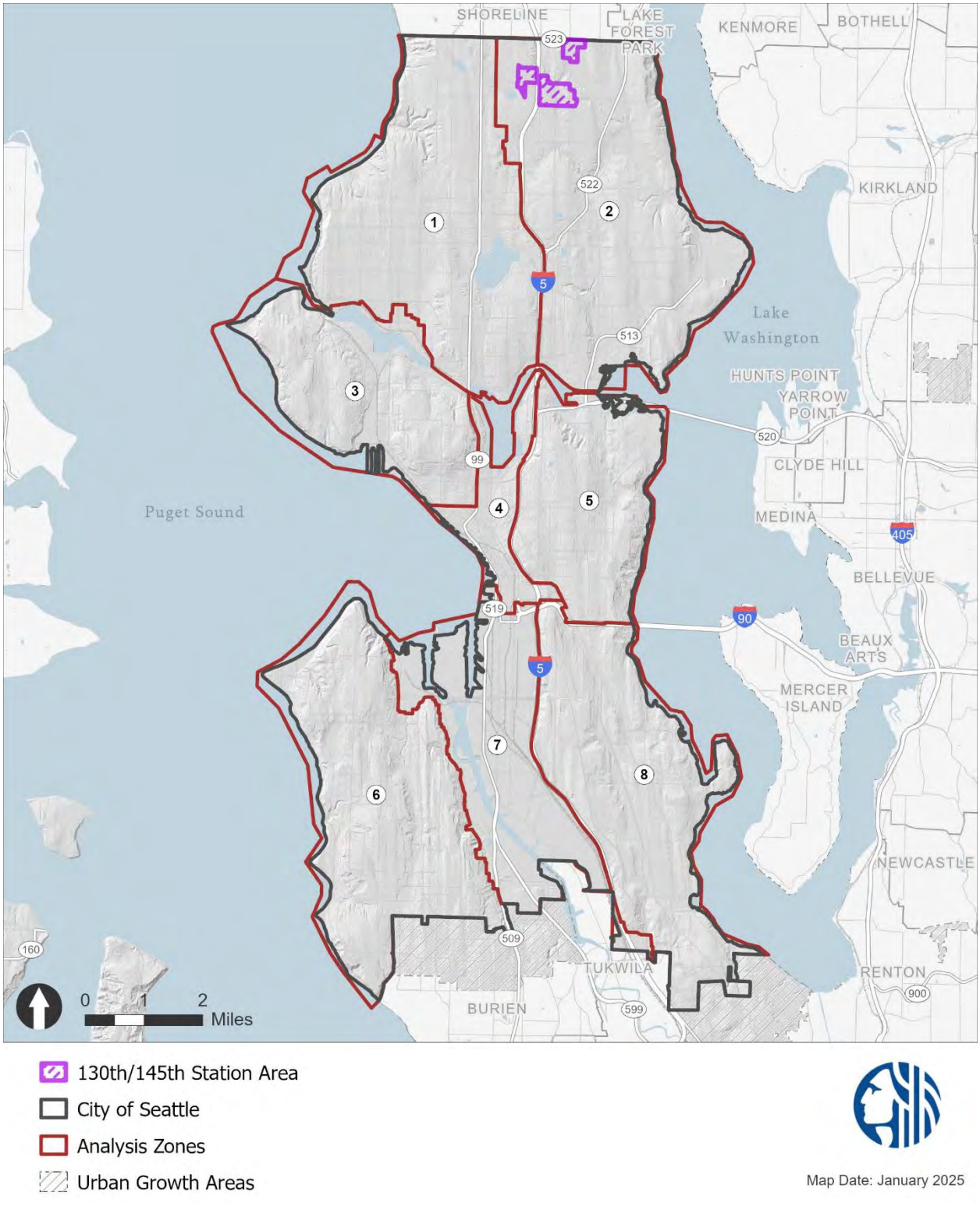
Critical Land Areas

Seattle's landforms consist of glacial-influenced, generally hilly terrain, bounded by Lake Washington on the east and Elliott Bay and Puget Sound on the west. City topography is presented in **Exhibit 3.1-1**. Areas around the Duwamish Waterway, Interbay, and the Thornton Creek valley contain alluvial or sandy soil conditions that pose a higher risk of movement and/or liquefaction during major earthquake events. In addition, steep slopes and known landslide locations have been documented throughout the city, with focus along shorelines and stream corridors. There are also Category 1 and Category 2 peat settlement-prone areas throughout the city, with Category 1 classified as higher quality environment with stricter protections than Category 2. Critical land areas in the city are shown in **Exhibit 3.1-2**.

Landcover & Hard Surfaces

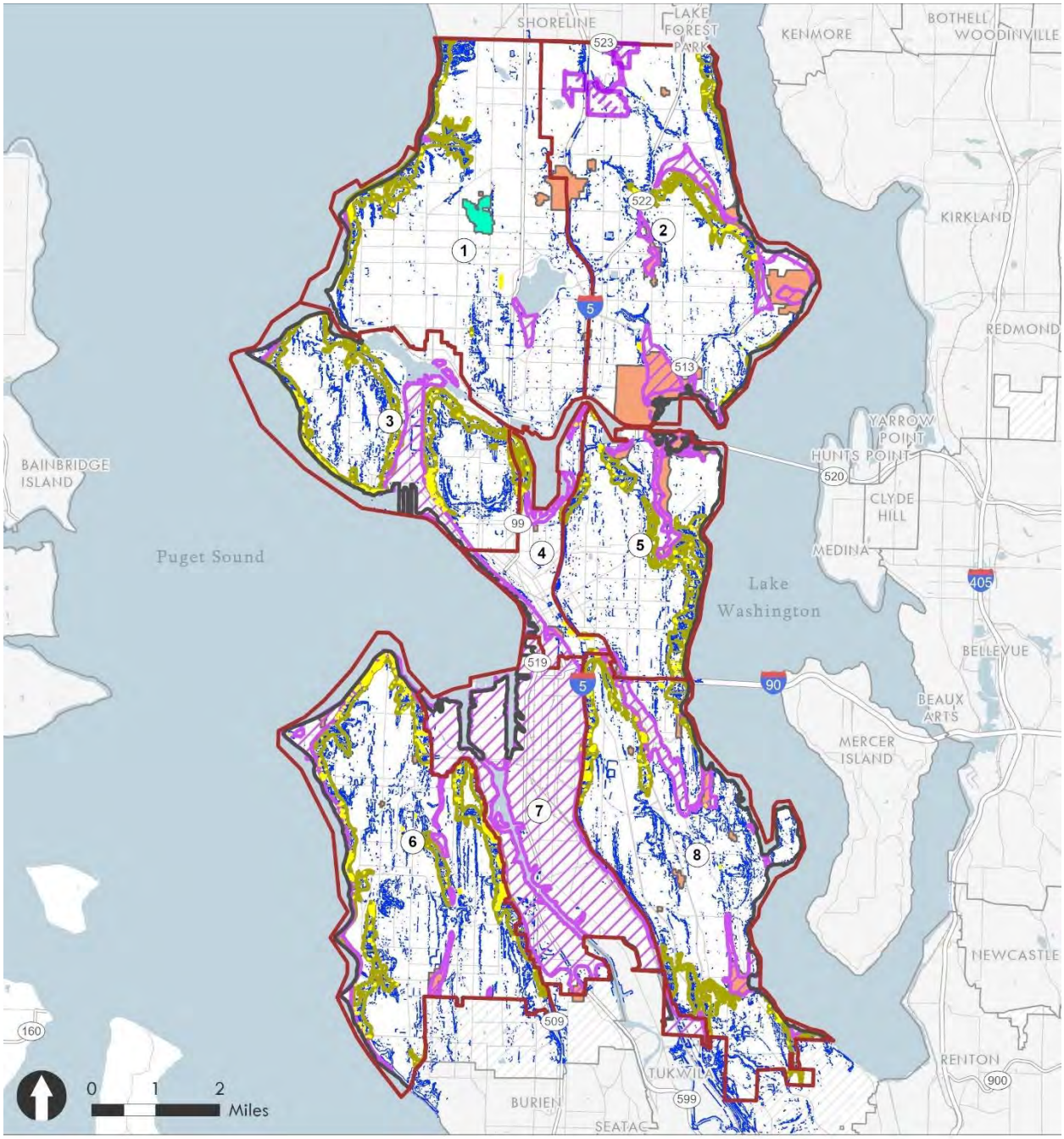
Landcover across most of the city has been extensively modified for over a century by development. The Washington State Department of Ecology has mapped areas in the state that have had over 40% impervious cover for about the last 40 years, and many of these areas are concentrated in Seattle as shown in **Exhibit 3.1-3**.

Exhibit 3.1-1. Topography



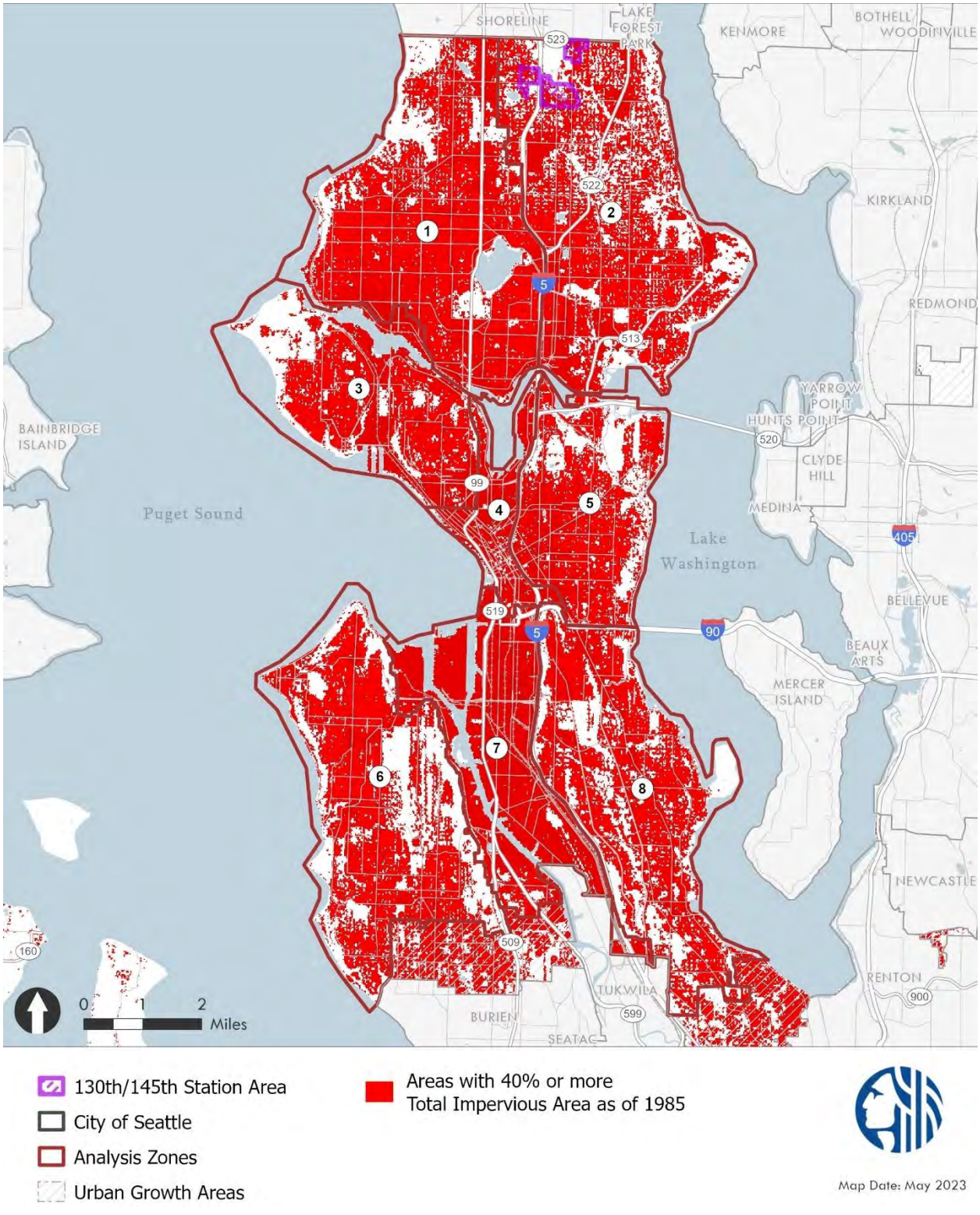
Note: This exhibit was updated in the Final EIS to remove fill color from cities outside of Seattle.
Sources: King County 2023a; Seattle, 2023.

Exhibit 3.1-2. Critical Land Areas



Source: Seattle, 2023.

Exhibit 3.1-3. Historically Impervious Surfaces



Sources: Ecology, 2019a; Seattle, 2023.

Surface Water

The City categorizes surface waters in four regulated classifications. These categories and an overview of their associated water bodies are summarized in **Exhibit 3.1-4**. Mapping of relevant surface water features, floodplains, water quality, and other characteristics is shown in **Exhibit 3.1-5** through **Exhibit 3.1-8.** Surface water fish presence, habitat, and wetland protections are discussed in **Section 3.3 Plants & Animals**. The municipal drainage system and combined sewer treatment areas are discussed in **Section 3.12 Utilities**.

Shorelines

Seattle has a major saltwater shoreline along its western boundary with Puget Sound, Elliott Bay, and the Duwamish Waterway. Along the city's eastern boundary, Lake Washington is classified as a Lake of Statewide Significance under WAC 173-20-370 and is protected against certain uses of its shoreline. Several of the city's shorelines have been impacted by port and industrial activities around Elliott Bay, Lake Union, and Ballard; and engineering activities such as the construction of the Ballard Locks, Montlake Cut, Harbor Island; and modifications to the Duwamish Waterway. Other shorelines across the city have low-density residential development while others are in more natural conditions**. Exhibit 3.1-9** depicts city shoreline environments.

Groundwater

As previously discussed, the land across the city has been heavily modified through development over the past 100 years. As such, groundwater recharge is limited. Also, groundwater use is generally limited to emergency and industrial supply wells for non-drinking use, with wells shown in **Exhibit 3.1-10**. No drinking water wells, wellhead protection areas, critical aquifer recharge areas, or sole source aquifers are identified in the study area.

Sea Level Rise

Areas of the city most susceptible to sea level rise are shown in **Exhibit 3.1-11.**

Socioeconomic Environmental Health Disparity

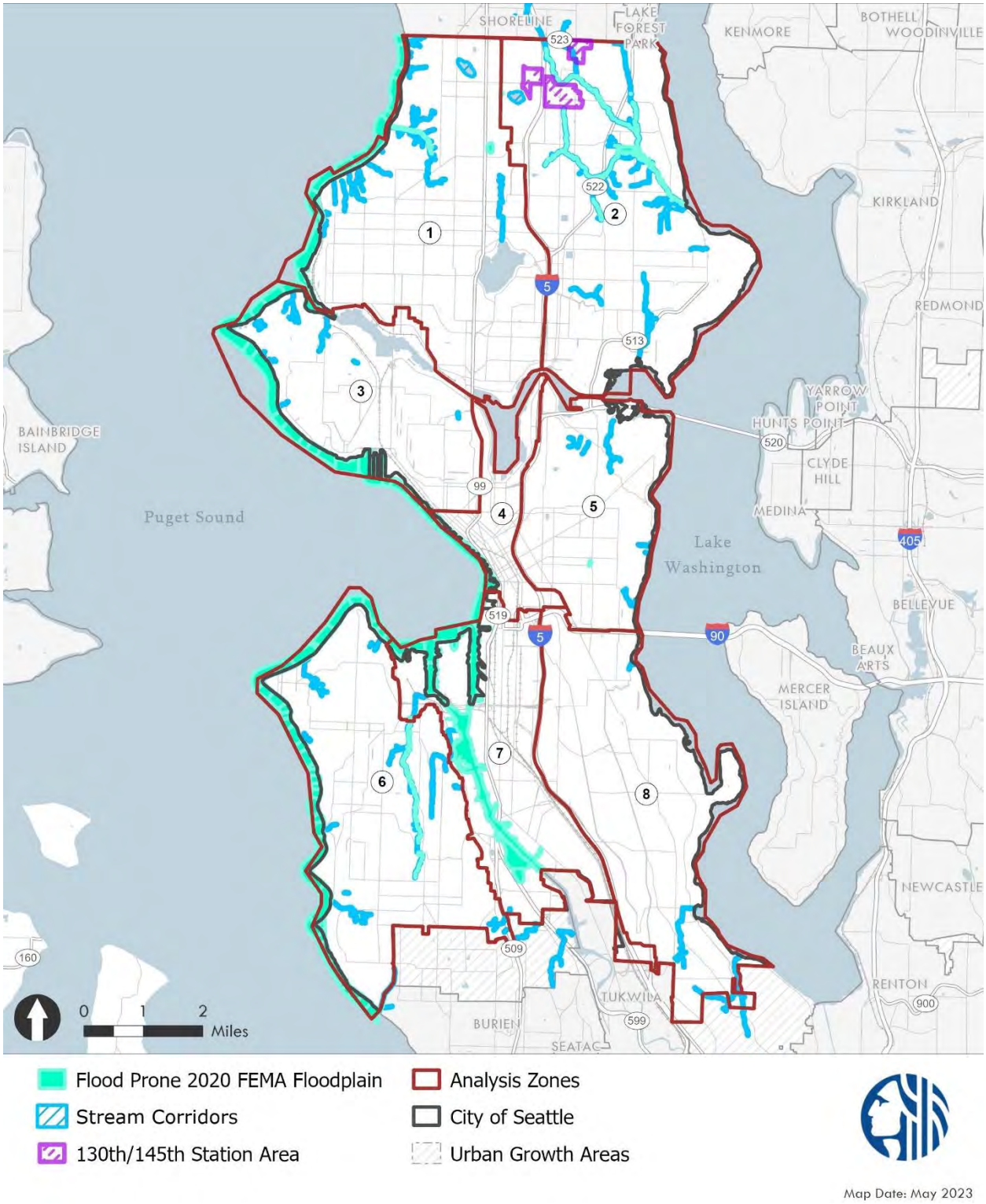
The Washington State Department of Health (WA DOH) has compiled state and national data to map over a dozen indicators of community and environmental health, including factors like proximity to hazardous waste facilities, proximity to wastewater discharges, income, and race. The data have been combined into a cumulative score to compare environmental and socioeconomic risk factors across all of Washington US census tracts. The compiled environmental health disparity scores for the US census tracts in Seattle are shown in **Exhibit 3.1-12.**

Exhibit 3.1-4. Seattle Surface Waters

City Category	Water Body	Water Quality Impairments	Flow Control Standards
Listed creeks	▪ Blue Ridge Creek ▪ Broadview Creek ▪ Discovery Park Creek ▪ Durham Creek ▪ Frink Creek ▪ Golden Gardens Creek ▪ Kiwanis Ravine/Wolfe Creek ▪ Licton Springs Creek ▪ Madrona Park Creek ▪ Mee-Kwa-Mooks Creek ▪ Mount Baker Park Creek ▪ Puget Creek ▪ Riverview Creek ▪ Schmitz Creek ▪ Taylor Creek ▪ Washington Park Creek	▪ Taylor Creek—temperature	Generally stricter flow control standards for development that require meeting forested-condition targets.
Non-listed creeks	▪ Fauntleroy Creek ▪ Longfellow Creek ▪ Piper's Creek ▪ Thornton Creek ▪ Any other stream not listed	▪ Fauntleroy Creek—bacteria ▪ Longfellow Creek—bacteria, dissolved oxygen, temperature ▪ Piper's Creek—bacteria ▪ Thornton Creek—bacteria, dissolved oxygen, temperature	Standards for development to meet forested-condition targets only when the existing condition is forested.
Small lakes	▪ Bitter Lake ▪ Green Lake ▪ Haller Lake	(None listed by Ecology)	Flow control requirements for development over a certain size threshold.
Designated receiving waters	▪ Duwamish River ▪ Elliott Bay ▪ Puget Sound ▪ Portage Bay ▪ Union Bay ▪ Lake Union ▪ Lake Washington ▪ Lake Washington Ship Canal ▪ Other City-identified and Ecology-approved waters	▪ Duwamish River—ammonia, bacteria, benzenes, bioassay, dibenzofuran, dioxins, dissolved oxygen, metals, PAHs, pesticides, pH, phenols, plasticizers, rubberizers, temperature ▪ Puget Sound—bacteria, benzenes, dioxins, furans, metals, PAHs, PCBs, phenol ▪ Lake Union—metals, PAHs, PCBs, temperature ▪ Lake Washington—Bacteria, dioxins, metals, PAHs, PCBs, pesticides, phenol ▪ Lake Washington Ship Canal—bacteria, PAHs, PCBs, pesticides, metals, temperature	Determined to have sufficient capacity to receive discharges of rainwater runoff without flow control.

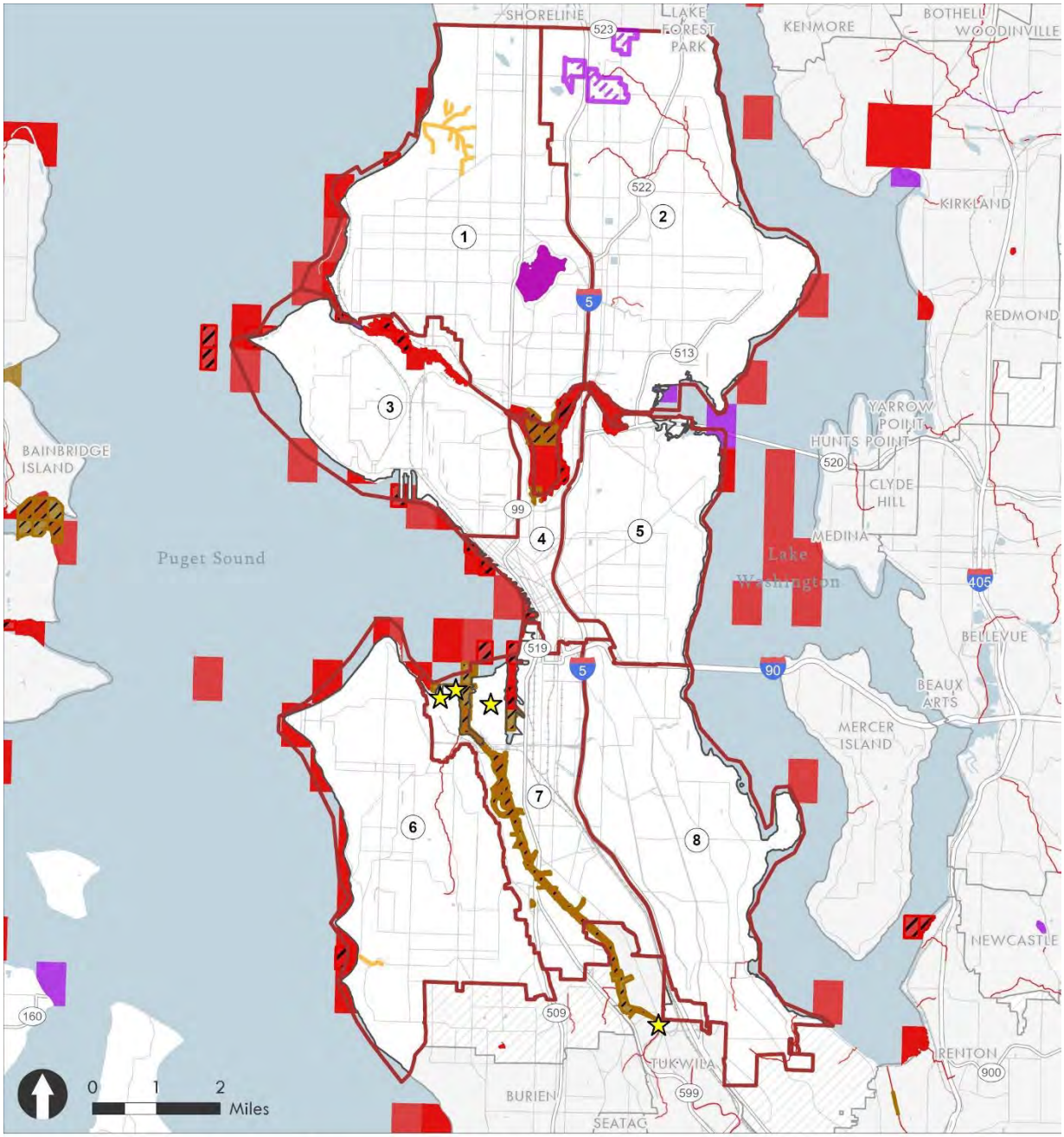
Notes: Metals include arsenic, cadmium, chromium, copper, lead, mercury, silver, and zinc; PAHs: polycyclic aromatic hydrocarbons; PCBs: polychlorinated biphenyls. Water quality treatment requirements are the same throughout the city regardless of the receiving water body.
Sources: Ecology, 2018; Seattle, 2021.

Exhibit 3.1-5. Water Resources



Source: Seattle, 2023a.

Exhibit 3.1-6. Impaired Water Bodies



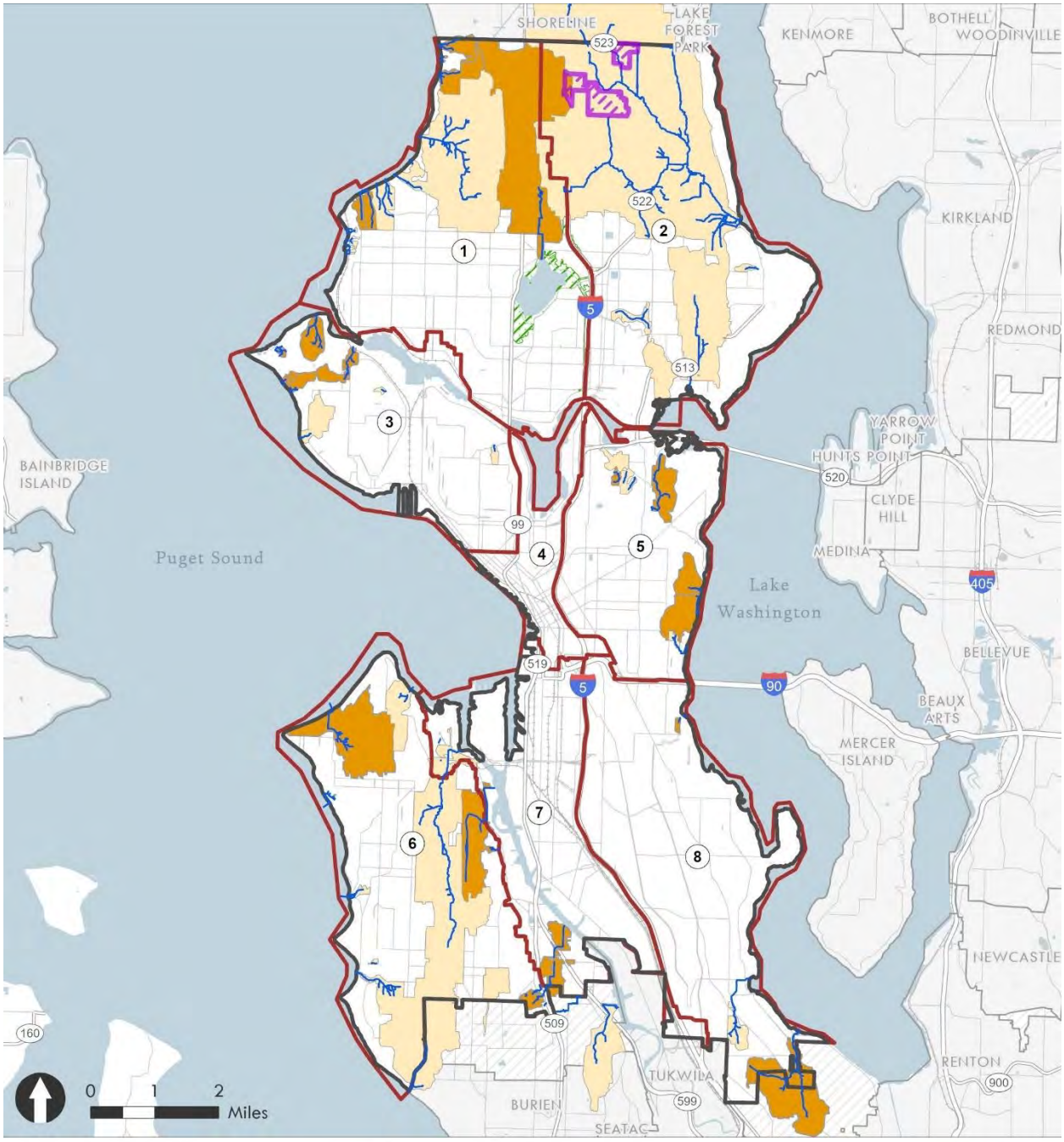
Water Quality Impairments
- Category 5 - 303d (Impaired Water Bodies)
- Category 4A (EPA-approved TMDL)
- Category 4B (Pollution Control Program)
- Category 4C (TMDL Not Applicable)
- Seattle Superfund Sites
- City of Seattle
- Urban Growth Areas

Sediment Impairments
- Category 5 - 303d (Impaired Water Bodies)
- Category 4A (EPA-approved TMDL)
- Category 4B (Pollution Control Program)
- Category 4C (TMDL Not Applicable)
- 130th/145th Station Area
- Analysis Zones

Map Date: May 2023

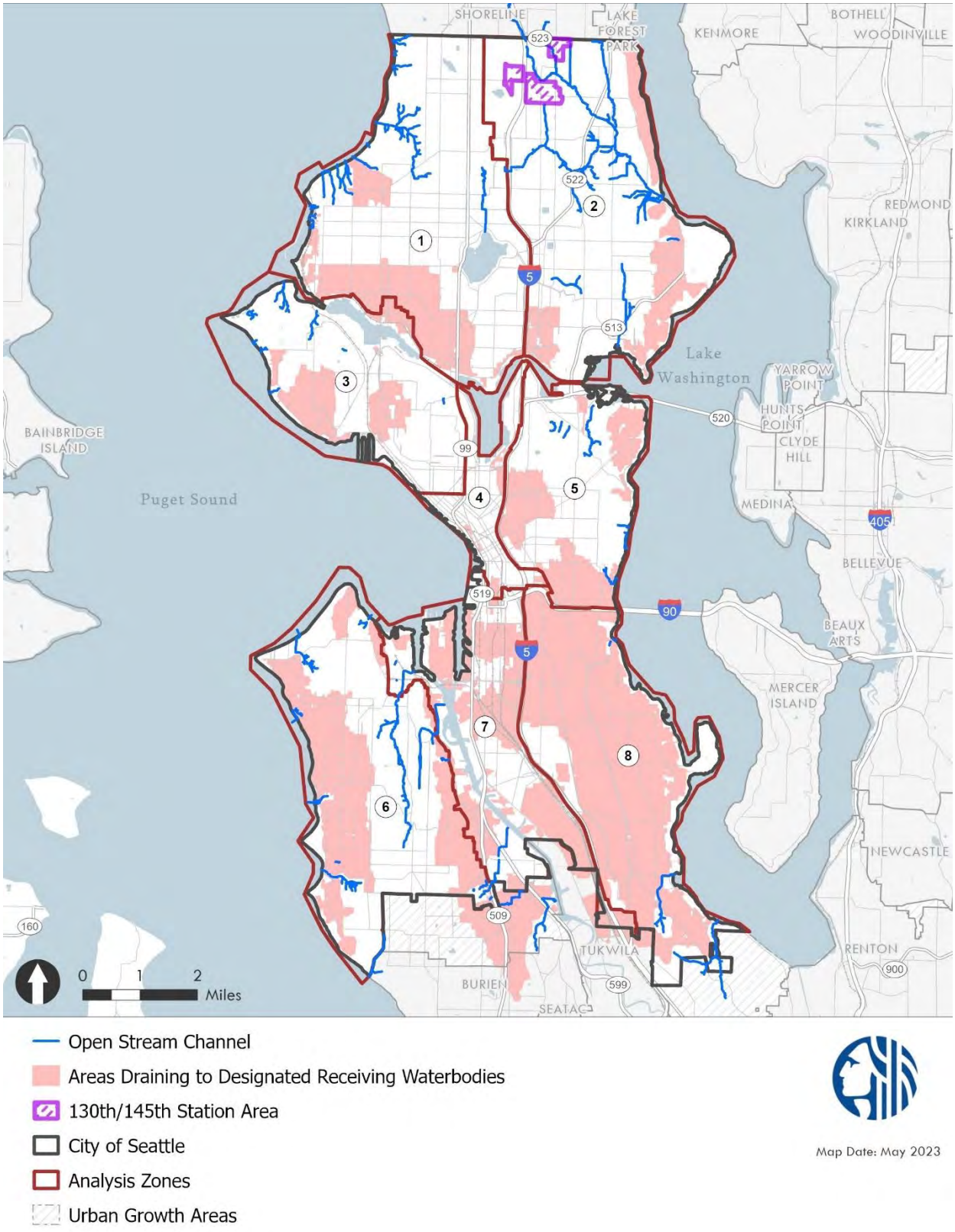
Source: Ecology, 2018; U.S. EPA, 2023.

Exhibit 3.1-7. Regulated Stream and Lake Watersheds



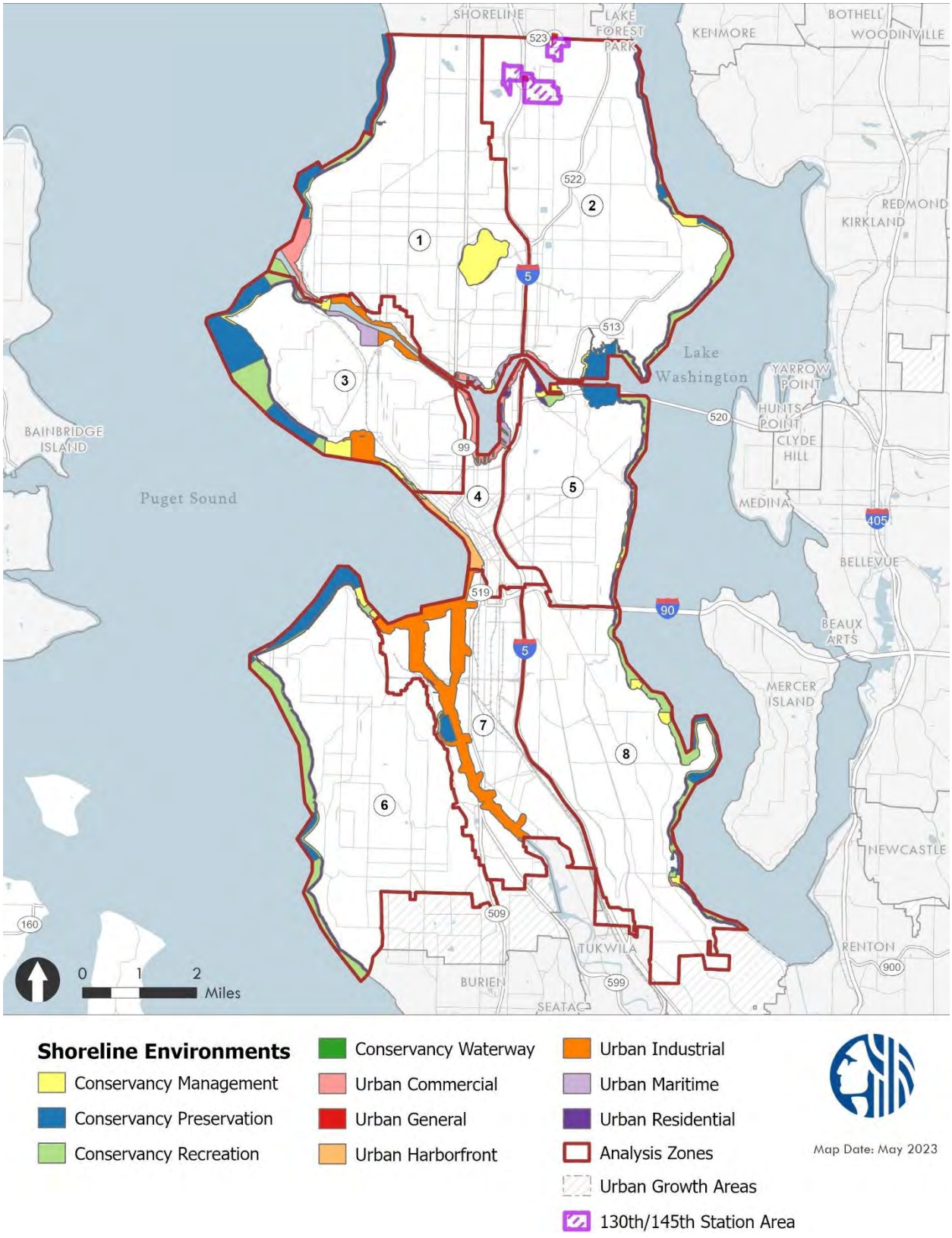
Source: Seattle, 2021.

Exhibit 3.1-8. Areas Draining to Receiving Waters Not Requiring Flow Control



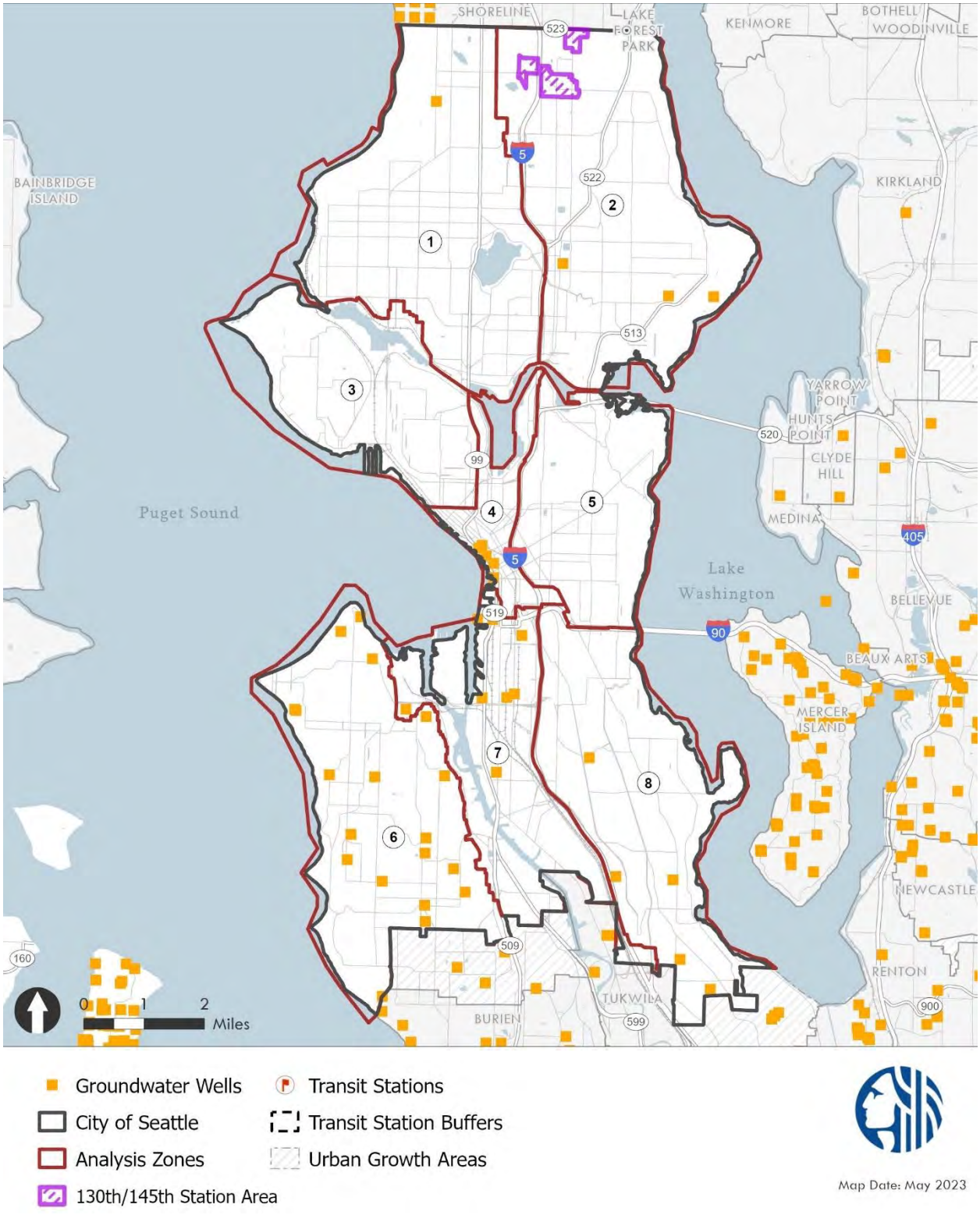
Source: Seattle, 2021.

Exhibit 3.1-9. Shoreline Areas



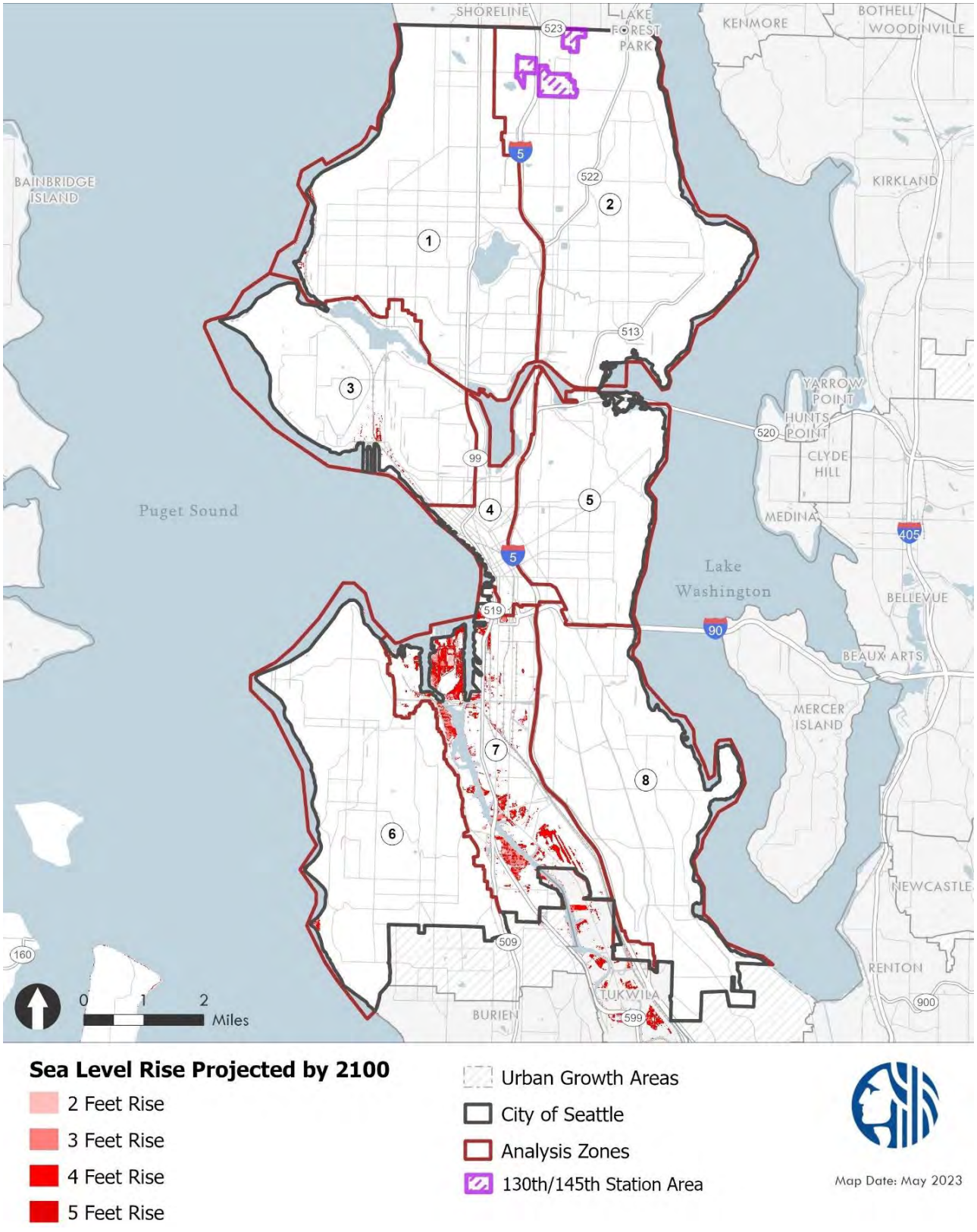
Source: Seattle, 2023a.

Exhibit 3.1-10. Groundwater Wells



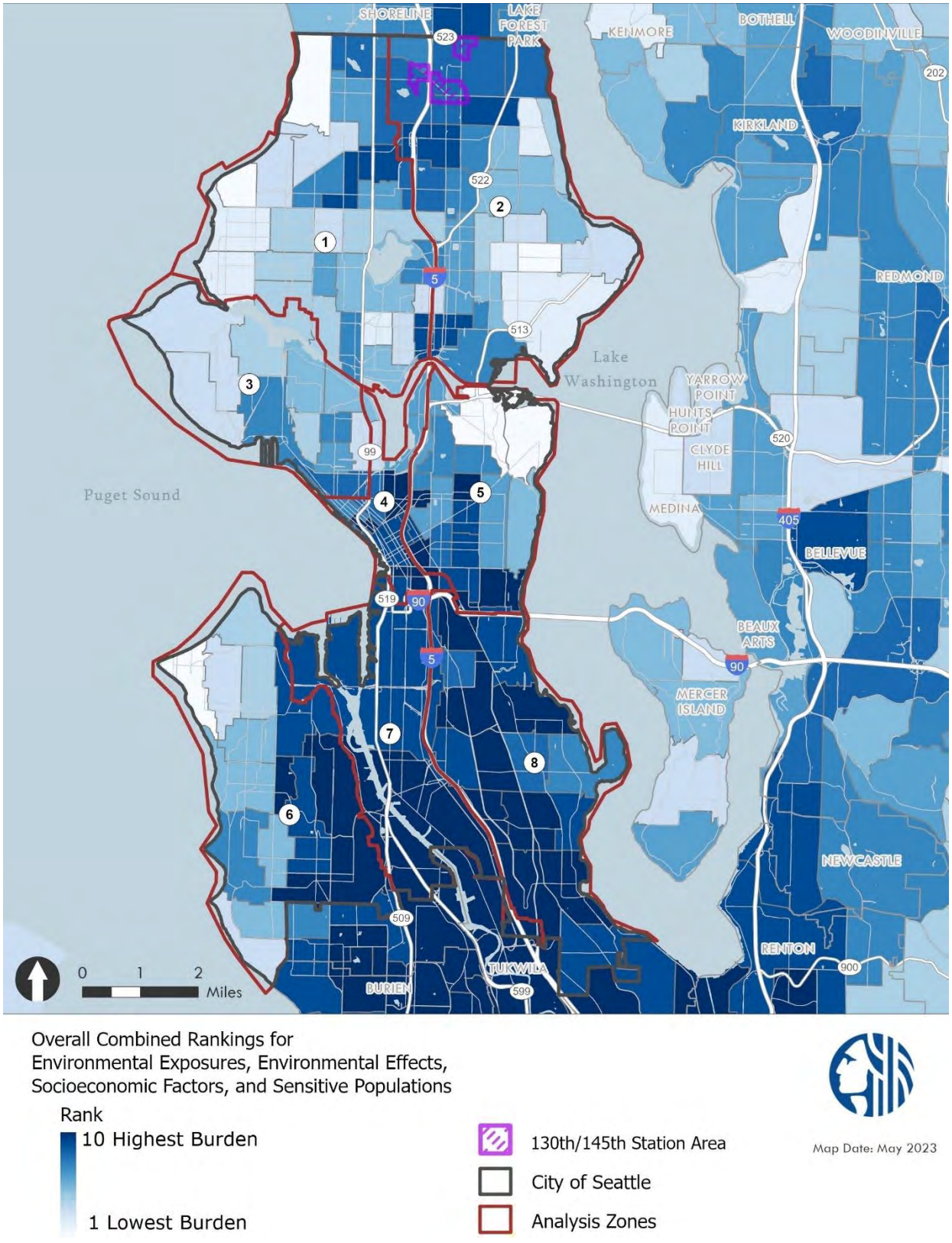
Sources: King County 2023b; Seattle, 2023a.

Exhibit 3.1-11. Forecasted Sea Level Rise



Source: NOAA, 2023; Seattle, 2023b.

Exhibit 3.1-12. Environmental Health Disparities



Source: WA DOH, 2023.

Analysis Areas

In addition to the citywide earth and water resources identified above, features unique to each area are identified in the following sections.

Area 1: NW Seattle

Key surface waters in and around Area 1 include:

- Blue Ridge Creek
- Broadview Creek
- Golden Gardens Creek
- Licton Springs Creek
- Piper's Creek
- Bitter Lake
- Green Lake
- Lake Union
- Lake Washington Ship Canal
- Puget Sound

Area 1 is the only area in the city with Category 1 peat settlement-prone areas, and also contains one of the largest areas of listed-creek watersheds in the city.

Area 2: NE Seattle

Key surface waters in and around Area 2 include:

- Thornton Creek
- Haller Lake
- Portage Bay
- Union Bay
- Lake Washington Ship Canal
- Lake Washington

Area 2 also contains more areas of Category 2 peat settlement-prone soils than any other area in the city.

130th/145th Study Area

The key surface water resource in and around 130th/145th Study Area is the north fork of Thornton Creek. The areas around the stream in the 130th/145th Study Area are classified as steep slopes, liquefaction-prone areas, and flood-prone areas.

Area 3: Queen Anne/Magnolia

Key surface waters in and around Area 3 include:

- Discovery Park Creek
- Kiwanis Ravine/Wolfe Creek
- Lake Washington Ship Canal
- Puget Sound

The center of Area 3 along the Interbay valley is categorized as liquefaction-prone. Also, Area 3 has the largest amount of Conservancy Preservation and Conservancy Recreation shoreline in the city.

Area 4: Downtown/Lake Union

Key surface waters in and around Area 4 include:

- Lake Union
- Lake Washington Ship Canal
- Elliott Bay

Area 4 is also the location of Downtown Seattle, the most densely developed area in the city.

Area 5: Capitol Hill/Central District

Key surface waters in and around Area 5 include:

- Frink Creek
- Madrona Park Creek
- Washington Park Creek
- Portage Bay
- Union Bay
- Lake Washington Ship Canal
- Lake Washington

Area 5 contains some of the largest areas of listed-creek watersheds in the city. In addition, Area 5 has the largest share of area mapped as not having been 40% impervious or more since 1985.

Area 6: West Seattle

Key surface waters in and around Area 6 include:

- Durham Creek
- Fauntleroy Creek
- Longfellow Creek
- Mee-Kwa-Mooks Creek
- Puget Creek
- Riverview Creek

- Schmitz Creek
- Elliott Bay
- Puget Sound

Area 6 contains some of the largest areas of listed-creek watersheds in the city.

Area 7: Duwamish

Key surface waters in and around Area 7 include:

- Duwamish River
- Elliott Bay

Topographically, the Duwamish River and Waterway corridor that makes up most of Area 7 is the flattest terrain in the city and almost all of it is classified as liquefaction-prone. Also, as shown in **Exhibit 3.1-11**, Area 7 is the most at-risk to effects from sea level rise out of any area in the city. This area has a long history of industrial use, the Duwamish River is identified as being impaired for more pollutants than any surface water in the city, and Area 7 contains 4 Superfund sites (the only area in the city to contain any). As shown in **Exhibit 3.1-12**, almost all census tracts in Area 7 are highly ranked (in the upper half of the range) for environmental health disparity.

Area 8: SE Seattle

Key surface waters in and around Area 8 include:

- Mount Baker Park Creek
- Taylor Creek
- Lake Washington

Area 8 has the largest amount of area draining to designated receiving waters (water bodies that are large enough to not be impacted by receiving runoff without flow control) in the city. Also, as shown in **Exhibit 3.1-12**, almost all census tracts in Area 8 are highly ranked (in the upper half of the range) for environmental health disparity.

3.1.2 Impacts

Impacts Common to All Alternatives

Direct

This section discusses impacts to earth and water resources that are common to all alternatives. It should be noted, though, that most impacts of future development projects on earth and water resources would be avoided or minimized through compliance with the City's Stormwater Code, Critical Areas Code, and other applicable regulations discussed in **Section 3.1.3**.

Big Picture Impacts

The comprehensive future planning associated with the plan alternatives would focus denser growth in the city's already developed urban area as opposed to allowing the same number of units to be dispersed more widely across ~~at same growth to impact more~~ rural, undeveloped areas ~~outside of the city~~in the region. This is expected to (1) lessen impacts to earth and water resources by providing housing units in smaller footprints, and (2) help prevent impacts to higher-quality rural earth and water resources throughout the region.

The impacts to earth and water resources common to all plan alternatives are:

- Construction impacts—Construction activities can involve removal of vegetation and soil disturbance, causing erosion, water quality impacts, and potential for soil contamination. Construction activities and associated rainfall runoff controls are required to meet permitting requirements that should prevent or minimize adverse impacts.
- Vehicle Use—All of the plan alternatives would result in increased vehicle use. Higher numbers of vehicle trips can potentially increase contamination of local receiving waters, depending on the level of stormwater runoff treatment provided to the roadways. Expected changes to single-occupancy vehicle trips are used as an indicator of potential increased pollution from vehicles. Increases in single-occupancy vehicle trips are presented in **Exhibit 3.1-13**, which is based on data from **Section 3.10 Transportation**.
- Hard Surfaces—All of the plan alternatives would result in an increase in the amount of hard surfaces (i.e., parking, buildings, etc., also known as impervious surfaces) in the city. The amount of hard surface versus vegetation in each place type impacts the way rainwater runoff mixes with potential pollution and soaks into the earth or is transported to natural receiving waters. Typically, areas with more hard surface and less vegetation produce greater impacts to earth and water resources. They increase runoff volumes, erode streams, increase stream temperatures, decrease groundwater recharge, and can increase flooding and habitat contamination. In places where some runoff does infiltrate into the ground, untreated stormwater that soaks into the earth could potentially contaminate groundwater. For the earth and water impacts analysis, factors that are used as gauges of increased hard surfaces are summarized in **Exhibit 3.1-13** and include number of housing units and their distribution of housing (new development is assumed to create more hard surfaces when it is spread into areas like Neighborhood Residential rather than concentrated into urban centers). Additional considerations of changes in land cover, including changes in vegetation, are discussed in **Section 3.3 Plants & Animals**.

Exhibit 3.1-13. Impacts Based on Expected Pollution and Runoff Increases

Metric	Alt. 1	Alt.2	Alt.3	Alt.4	Alt.5	Pref. Alt.
Pollution Indicator: Daily Single-Occupancy Vehicle Trips (millions)	1.78	1.85	1.85	1.85	**1.91**	**1.89**
Hard Surface Indicator: Housing Units	80,000	100,000	100,000	100,000	**120,000**	**120,000**
Hard Surface Indicator: ~~Share of~~ Distribution of Development~~able Acres~~						
Existing Centers* (continued development with no place type change)	~~58~~57%	58%	58%	58%	58%	36%
Plan Additions: Centers & Corridors** (hard surfaces are expected increase in these areas)	0%	6%	0%	15%	**20%**	**24%**
Neighborhood Residential** (hard surfaces are expected increase in these areas)	0%	0%	**29%**	0%	13%	**40%**
Outside Subareas*** (continued development with no place type change)	42%	36%	13%	27%	9%	0%****
Impact of Alternative Compared to No Action	**Baseline**	**Lowest Impact**	**~~Highest~~ High Impact**	**Moderate Impact**	**~~Highest~~ Higher Impact**	**Highest Impact**

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—edits made to the row headings and Alternatives 1–5 are shown in tracks.
* "Existing Centers" are shown to clarify that these areas present in the Baseline will also be present in each plan alternative. They are not a differentiator between the baseline and plan alternatives.
** "Plan Additions: Centers and Corridors" and "Neighborhood Residential" are new elements that are part of the plan alternatives and are included in the impacts analysis.
*** "Outside Subareas" include~~s~~ all areas outside the other listed geographies and are typically parks, major institutions, and some residential areas. Alternatives 1-5 would not ~~No~~ change the ~~to~~ place type in ~~is proposed in~~ these areas, though growth in the residential areas ~~will~~ would continue ~~to occur~~ under current zoning throughout the 20-year planning period.
****See **Exhibit 2.4-26**. Under the Preferred Alternative, the same 3,854 acres of "Outside Subareas" as Alternatives 1-5 are technically classified as new place type—neighborhood center, urban neighborhood, or frequent transit corridor place types. This includes areas where residential development will not occur, such as parks and major institutions. The potential for and extent of development in these areas under the Preferred Alternative would be similar to Alternatives 1-5 as no substantial shift is expected from currently allowed development patterns.
Source: City of Seattle, 2024~~3~~; Parametrix, 2024; BERK, 2024~~3~~.

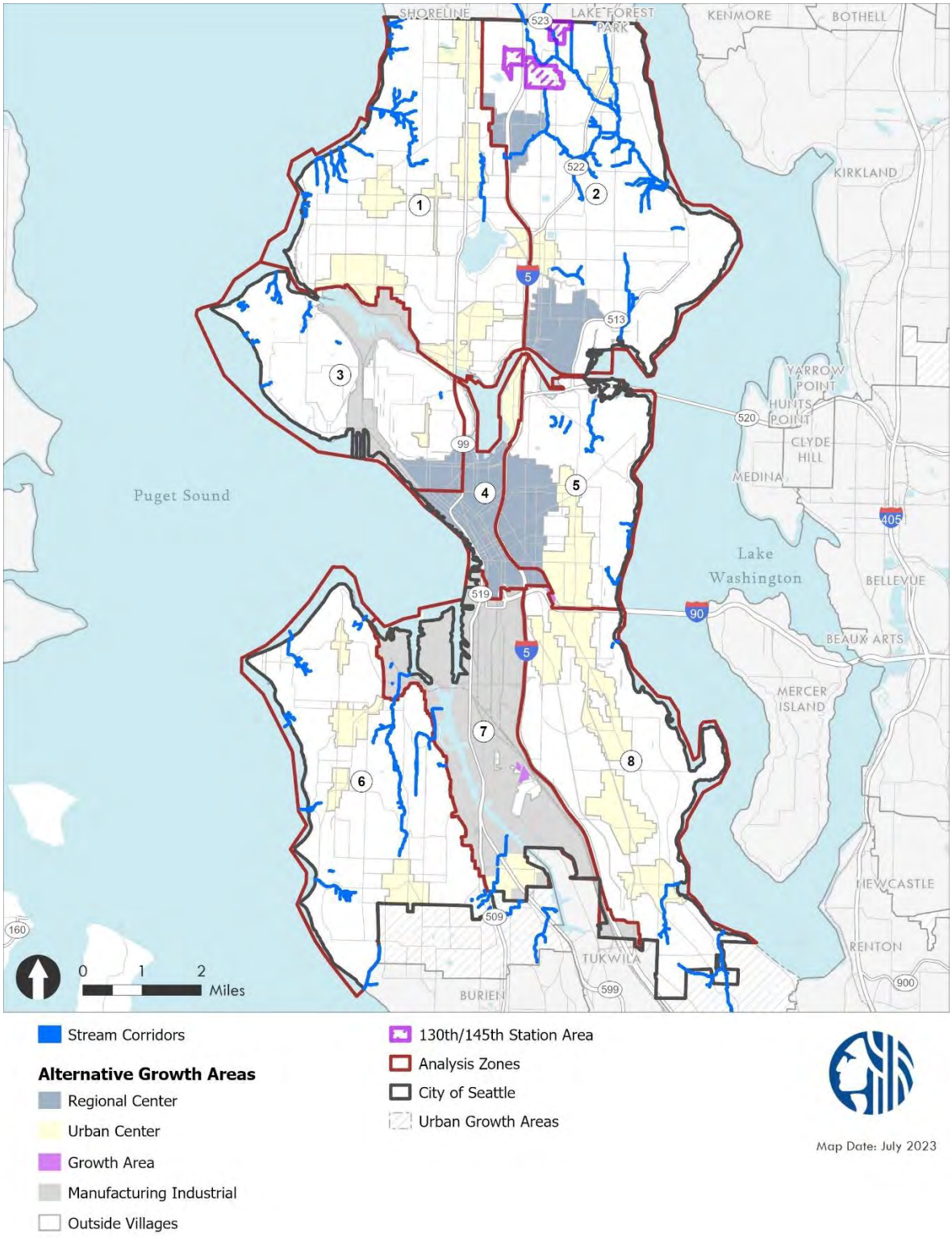
- Proximity to Water Resources—As discussed in **Section 3.1.1**, natural water resources (streams, lakes, and associated floodplains) exist throughout the city. Each of the plan alternatives could have increased impacts on these resources where development density is focused in closer proximity to these resources. The increased density associated with each alternative in proximity to water resources is shown in **Exhibit 3.1-14** ~~and~~, **Exhibit 3.1-15**, and **Exhibit 3.1-17**.However, development within and near these surface water resources is regulated and impacts would be mitigated under the applicable City codes, as discussed in **Section 3.1.3**.

In summary, every alternative would increase density in the city boundary and likely result in increased vehicle use, increased hard surfaces, and focus additional development closer to water resources. However, as mentioned above, the redevelopment associated with each plan alternative would comply with City codes requiring stormwater management, critical area protections, building upgrades, and other measures to avoid or minimize potential impacts to earth and water resources.

Indirect

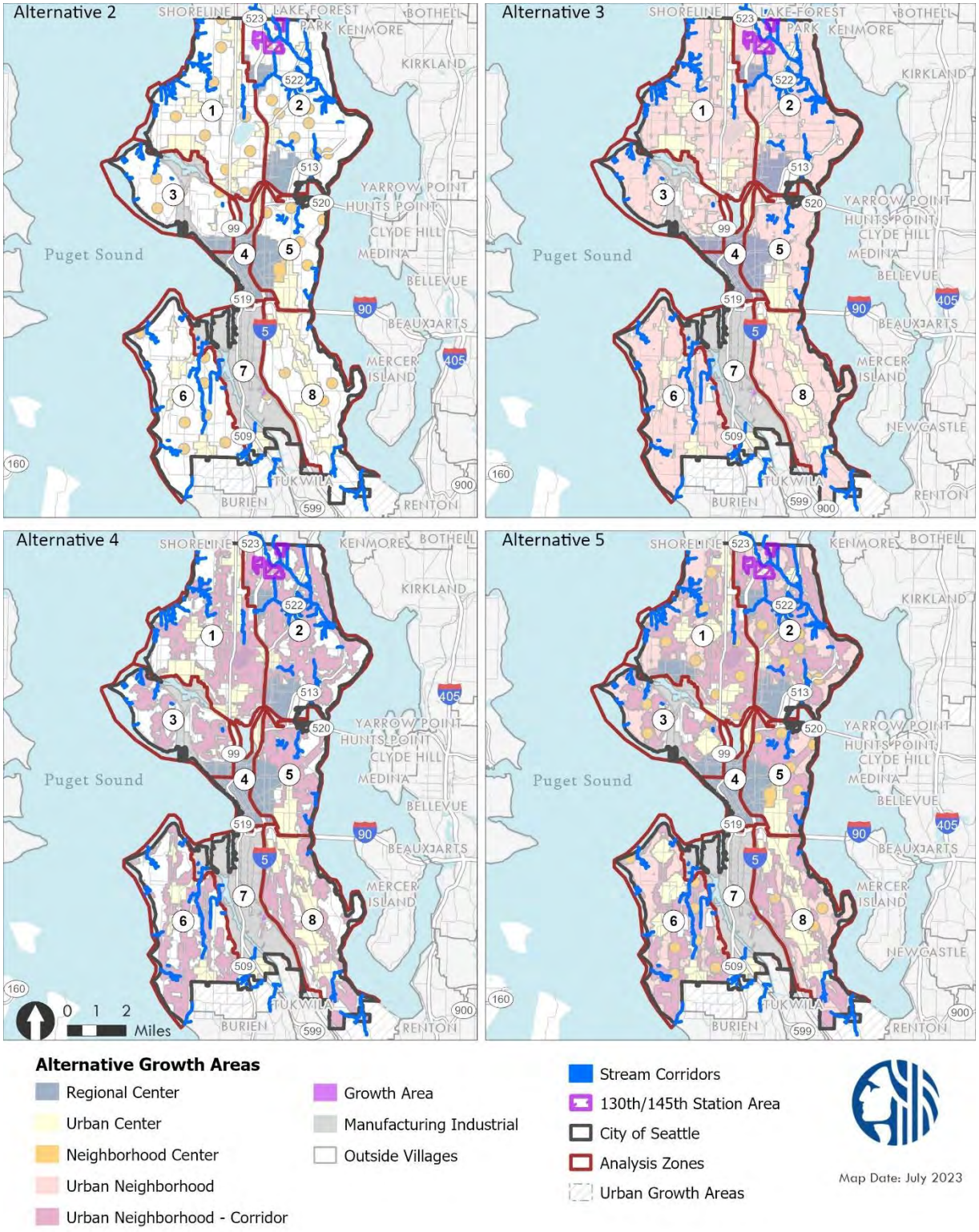
Indirect impacts potentially occur as a result of the proposed action and are reasonably foreseeable, but they occur later in time or farther removed in distance. Indirect impacts on earth and water resources generally come from each alternative's potential indirect changes to pollutant sources and land cover through changes to the pattern and locations of population density and growth rate. As outlined in Vision 2050 (PSRC, 2020), focusing growth in previously developed urban areas will result in less impact on regional earth and water resources than focusing the same growth in previously undeveloped areas outside of cities that add new impervious surfaces controlled under current standards. Expected changes to population density is presented in **Exhibit 3.1-14** ~~and~~, **Exhibit 3.1-15**, and **Exhibit 3.1-17**, which are based on data from **Section 3.10 Transportation**. Overall, the indirect effect from every alternative is considered beneficial to earth and water resources in the region that includes the city and areas beyond.

Exhibit 3.1-14. Proximity of Increased Density to Water Resources (Alternative 1, No Action)



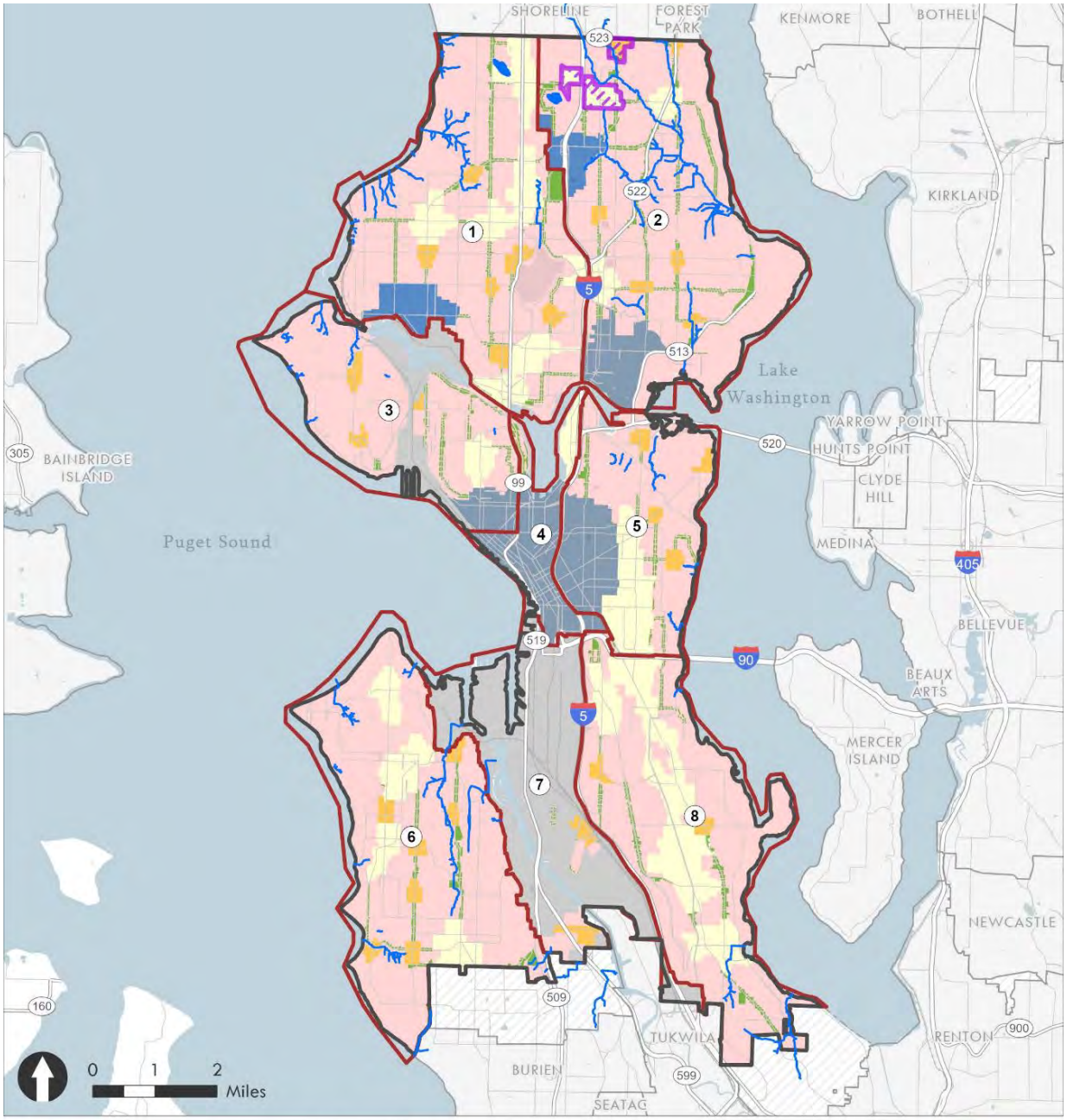
Note: See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2-5~~.
Source: Seattle, 2023a; BERK, 2023.

Exhibit 3.1-15. Proximity of Increased Density to Water Resources (Alternatives 2 through 5)



Note: 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 the other a~~A~~lternatives ~~2–5~~.
Source: Seattle, 2023a; BERK, 2023.

Exhibit 3.1-16. Proximity of Increased Density to Water Resources (Preferred Alternative)



Note: No growth is assigned to public facilities under the Preferred Alternative (e.g., parks) even though they are shown as urban neighborhood on this map.
Source: City of Seattle, 2024; Parametrix, 2024; BERK, 2024.

Equity & Climate Vulnerability Considerations

As shown in **Exhibit 3.1-12**, several areas of the city rank high (in the upper half of the scoring range) for environmental health disparities. Redevelopment in these areas associated with the plan alternative could have both beneficial and detrimental impacts to the population in these areas, as follows:

- Water Quality: As discussed in the sections that follow, areas of a city that have been developed for decades in the past may not have rainwater runoff management that captures pollution or controls flow volumes to the maximum extent practicable. Redevelopment often triggers requirements to upgrade stormwater management to meet current standards, which can either avoid impacts or result in a benefit to earth and water resources, and in turn to those living in the surrounding community. Also, newer stormwater infrastructure can be designed to be more resilient to changes in rainfall frequencies and volumes, thereby lowering the flood risks for the community. As such, in cities like Seattle with landcover that has been historically developed for centuries, redevelopment that is focused in areas with underserved populations can sometimes help address environmental inequities related to water quality. Considering the pattern of density in **Exhibit 3.1-14** ~~and~~, **Exhibit 3.1-15**, **Exhibit 3.1-16**, and **Exhibit 3.1-17**, Alternative 1 would have the lowest level of redevelopment compared to Alternative 5 and the Preferred Alternative with the most and Alternatives 2 to 4 with medium amounts~~and Alternative 5 the most~~. If resources are directed equitably, it could reduce environmental inequities. However, as previously discussed and shown in **Exhibit 3.1-14** ~~and~~, **Exhibit 3.1-15**, and **Exhibit 3.1-17**, each of the plan alternatives could have increased environmental impacts where development density is focused in closer proximity to water resources.
- Exposure to Contaminated Sites: Populations living near historically contaminated sites can be at risk from environmental hazard exposure, and disturbance of the ground surface in these areas can sometimes increase the risk. However, larger redevelopment in these areas can trigger site remediation to either more safely contain the contaminants up to current standards or remove the contaminants to a designated hazardous waste disposal site. Therefore, redevelopment can sometimes pose a risk of exposure from contaminated sites or motivate additional clean-up and protection, depending on the scale of the project. The City regulates development around known contaminated sites, as discussed further in **Section 3.1.3**.
- Exposure to Flooding and Landslides: Where redevelopment would trigger installation of newer stormwater infrastructure as described above, that infrastructure can be designed to be more resilient to changes in rainfall frequencies and volumes, thereby lowering the flood risks for the community. In addition, as discussed in **Section 3.1.3**, the City regulates development in areas that are landslide-prone, steep slope erosion hazards, and liquefaction-prone. While Alternative 1 retains current plans and regulations, the action alternatives advance the City's climate resilience with a new climate element based on a climate vulnerability assessment.
- Future Affect by Sea-Level Rise: As discussed in **Section 3.1.3**, the City limits development in designated shoreline areas, which are areas most likely to be affected by sea-level rise.

However, the current codes are based on current water surface elevation metrics and may not fully address resiliency to potential impacts from forecasted sea-level rise. As shown in **Exhibit 3.1-11**, the area more likely to continue to see coastal flooding is in Area 7, which is primarily used and planned for industrial purposes and would potentially have similar growth under all alternatives. Other areas that may also be affected by sea-level rise ~~and~~ during storm surges include Ballard and Broadview (Area 1), Discovery Park and Lower Queen Anne (Area 3), Downtown (Area 4), and West Seattle (Area 6). Growth levels are similar in Downtown (Area 4) across alternatives but tend to be lower in Alternative 1 compared to Alternative 5 and the Preferred Alternative with the most and Alternatives 2 to 4 with medium amounts~~and higher in Alternative 5~~ in other areas. Depending on the location of growth, Alternative 5 and the Preferred Alternative could result in exposure of more people to sea level rise impacts during storm surges. Compared to Alternative 1, No Action, the action alternatives would potentially have less risk of sea level rise exposure to communities because of the new climate element required under the Growth Management Act (GMA) and climate resilience strategies included to direct growth away from shorelines.

Impacts of Alternative 1: No Action

Alternative 1 represents the No Action baseline against which all other alternatives are compared. It would allow a continuation of growth of 80,000 dwellings and 158,000 jobs on redevelopable and vacant lands, with most residential growth directed to urban centers and villages considering current place types. Alternative 1, No Action, would have the lowest potential land cover conversions of vegetation to hard surface, the lowest expected increase in daily vehicle trips, lowest potential to locate growth in sea level rise hazard areas and would focus increased density farther away from water resources than all other alternatives. It would emphasize place types that have benefits; however, its lower amount of new housing in the city compared to the other plan alternatives could result in housing growth in the region beyond the city. This could indirectly result in adverse impacts to more pristine water resources throughout the region, as described under **Impacts Common to All Alternatives**.

130th/145th Station Area

The 130th/145th Station Area is in close proximity to Thornton Creek, and runoff from these areas is in the associated regulated stream basin. For the reasons described above, Alternative 1, No Action, presents the lowest potential for direct impacts on earth and water resources within the 130th/145th Station Area.

Impacts of Alternative 2: Focused

Alternative 2 would have the least potential land cover conversions of vegetation to hard surface, the lowest expected increase in daily vehicle trips, and would focus increased density farther

away from water resources than all other action alternatives. Therefore, Alternative 2 is expected to have the lowest potential for direct impacts to earth and water among the alternatives.

For sea level rise, Alternative 2 has a moderate potential to locate growth in sea level rise hazard areas outside of Area 7. In Area 3, its growth is similar to that of Alternative 5 and depending on growth location near shorelines could have a similar risk as Alternative 5 in that area.

Alternative 2 (along with Alternatives 3 and 4) offers a lower amount of new housing in the city among the action alternatives and could result in housing growth in the region beyond the city. Based on this, Alternative 2 could indirectly result in adverse impacts to some of the more pristine water resources throughout the region, as described under Impacts Common to All Alternatives.

130th/145th Station Area

The 130th/145th Station Area is in close proximity to Thornton Creek, and runoff from these areas is in the associated regulated stream basin. ~~For the reasons described above, Alternative 2 presents the lowest potential for direct impacts on earth and water resources w~~Within the 130th/145th Station Area, potential development would be similar among the action alternatives, and they would each have higher expected direct impacts to earth and water resources compared to Alternative 1.

Impacts of Alternative 3: Broad

Alternative 3 would have ~~the highest~~higher potential land cover conversions of vegetation to hard surface, moderate~~high~~ expected increase in daily vehicle trips, and would focus a higher amount of increased density closer to water resources than other action alternatives. Therefore, (along with Alternative 5) Alternative 3 is expected to have ~~the highest~~higher potential for direct impacts to earth and water among the alternatives.

For sea level rise, Alternative 3 has a moderate risk of growth in sea level rise hazard areas in Areas outside of Area 7.

Also, Alternative 3 (along with Alternatives 2 and 4) offers a lower amount of new housing in the city among the action alternatives and could result in housing growth in the region beyond the city. Based on this, Alternative 3 could indirectly result in adverse impacts to some of the more pristine water resources throughout the region, as described under **Impacts Common to All Alternatives**.

130th/145th Station Area

A station area plan would not be implemented under Alternative 3; designations and zoning would match the overall intent of Alternative 3 for more growth spread to urban neighborhoods.

Impacts of Alternative 4: Corridor

Alternative 4 would have ~~the~~ moderate potential land cover conversions of vegetation to hard surface, ~~high~~ moderate expected increase in daily vehicle trips, and would focus some increased density closer to water resources compared to the baseline. Therefore, Alternative 4 is expected to have ~~the~~ moderate potential for direct impacts to earth and water among the alternatives.

Like Alternative 3, there is a moderate risk of added growth from Alternative 4 in areas that may have a long-term potential risk of exposure to sea level rise.

Also, Alternative 3 (along with Alternatives 2 and 4) offers a lower amount of new housing in the city among the action alternatives and could result in housing growth in the region beyond the city. Based on this, Alternative 3 could indirectly result in adverse impacts to some of the more pristine water resources throughout the region, as described under **Impacts Common to All Alternatives**.

130th/145th Station Area

A station area plan would not be implemented under Alternative 4; designations and zoning would match the overall intent of Alternative 4 for more growth spread to corridors.

Impacts of Alternative 5: Combined

Alternative 5 would have higher potential land cover conversions of vegetation to hard surface, ~~the highest~~high expected increase in daily vehicle trips, and would focus a ~~the highest~~higher amount of increased density closer to water resources than all other action alternatives. Therefore, (along with Alternative 3) Alternative 5 is expected to have ~~the highest~~higher potential for direct impacts to earth and water among the alternatives.

Alternative 5 may expose more populations to sea level rise with storm surges, depending on the location of housing.

~~Among all of the alternatives, however,~~ However, Alternative 5 offers ~~the highest~~a higher 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 more pristine water resources throughout the region, as described under **Impacts Common to All Alternatives**.

130th/145th Station Area

The 130th/145th Station Area is in close proximity to Thornton Creek, and runoff from these areas is in the associated regulated stream basin. ~~For the reasons described above, Alternative 5 presents the highest potential for direct impacts on earth and water resources w~~Within the 130th/145th Station Area ~~among the action alternatives.~~, potential development

would be similar among the action alternatives, and they would each have higher expected direct impacts to earth and water resources compared to Alternative 1.

Impacts of Preferred Alternative

Note: The impacts analysis for the Preferred Alternative was added since the Draft EIS.

The Preferred Alternative would have the highest potential land cover conversions of vegetation to hard surface, high expected increase in daily vehicle trips, and would focus the highest amount of increased density closer to water resources. Therefore, the Preferred Alternative is expected to have the highest potential for direct impacts to earth and water among the alternatives.

Depending on the location of growth, the Preferred Alternative may expose more populations to sea level rise during storm surges.

Among all of the alternatives, however, the Preferred Alternative (along with Alternative 5) offers a higher amount of new housing in the city, which would deter housing growth in the region beyond the city. Based on this, the Preferred Alternative could indirectly avoid adverse impacts to some of the more pristine water resources throughout the region, as described under **Impacts Common to All Alternatives**.

130th/145th Station Area

The 130th/145th Station Area is in close proximity to Thornton Creek, and runoff from these areas is in the associated regulated stream basin. Within the 130th/145th Station Area, potential development would be similar among the action alternatives, and they would each have higher expected direct impacts to earth and water resources compared to Alternative 1.

3.1.3 Mitigation Measures

Incorporated Plan Features

None of the alternatives described in **Chapter 2** of this EIS include plan features that explicitly address earth and water resources. However, the Comprehensive Plan includes policies relevant to the city-wide protection and restoration of earth and water resources in the following sections:

- Growth Strategy—Natural Environment
- Land Use—General Development Standards
- Land Use—Environmentally Critical Areas
- Capital Facilities—Operations and Maintenance
- Utilities—Resource Management

- Utilities—Facility Siting and Design
- Environment—Land
- Environment—Water
- Environment—Climate

~~A~~The action alternatives would amend all elements as part of the Periodic Update; this includes similar and improved policies addressing earth and water resources. The Draft One Seattle Plan includes a new climate element required under the Growth Management Act (GMA). It will include greenhouse gas reduction policies and climate resilience policies to avoid and adapt to climate risks including sea level rise, flooding, and risks of landslides due to extreme precipitation based on the Seattle Climate Vulnerability Assessment 2023.

Regulations & Commitments

Most impacts on earth and water resources from future development projects associated with the alternatives would be avoided or minimized through compliance with the City's Stormwater Code, Critical Areas Code, and other applicable regulations such as those listed below.

Federal

- Clean Water Act, 33 United States Code (USC) 1251 et seq., including Sections 401—Water Quality Certification, 402—National Pollutant Discharge Elimination System, and 404—Permits for Dredge or Fill
- Coastal Zone Management Act, 16 USC 1451 et seq.
- Section 14 of the Rivers and Harbors Act of 1899, 33 USC 408 (Section 408)
- National Flood Insurance Act of 1968 and Flood Disaster Protection Act of 1973, 42 USC 4001 et seq.
- Floodplain Management Presidential Executive Order 11988
- Endangered Species Act (ESA) Biological Opinion for the Implementation of the National Flood Insurance Program in the State of Washington (National Marine Fisheries Service 2008)
- Safe Drinking Water Act, 42 USC 300 et seq., Chapter 6A

State & Regional

- Water Quality Standards for Surface Waters, Washington Administrative Code (WAC) 173201A
- Water Quality Standards for Groundwater, WAC 173-200
- Flood Control Management Act, Revised Code of Washington (RCW) 86
- Water Pollution Control Act, RCW 90.48
- Shoreline Management Act, RCW 90.58, WAC 173-26
- National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit (Washington State Department of Ecology [Ecology], 2021)

- National Pollutant Discharge Elimination System (NPDES) Western Washington Phase I Municipal Stormwater General Permit (Ecology, 2019b)
- Stormwater Management Manual for Western Washington (Ecology Manual) (Ecology, 2019a)
- Washington State Department of Transportation (WSDOT) Highway Runoff Manual (WSDOT, 2019a)
- WSDOT Hydraulics Manual (WSDOT, 2019b)
- Washington State Hydraulic Code, WAC 220-660

City of Seattle

The City is subject to the state regulations described above. In addition, the City has also enacted several local regulations that govern water quality in the study area, which are described below.

Stormwater Code and Manual—SMC Title 22, Subtitle VIII (22.800 to 22.808)

To support implementation of the City's Stormwater Code and other applicable regulations, the Director of Seattle Public Utilities (SPU) and the Director of the Department of Planning and Development have promulgated rules that provide approved technical methodology, criteria, guidelines, and additional information pursuant to the Stormwater Code authority. Currently, there are four of these joint "Directors' Rules" covering source control, construction stormwater control, stormwater flow control and water quality treatment, and stormwater code enforcement. The City's Stormwater Manual is a compilation of the Directors' Rules (Seattle, 2021); as such, it describes guidance for complying with the Seattle Stormwater Code. Key aspects of the Stormwater Code and manual that may be applicable to the alternatives are summarized in the following sections.

- **Construction.** All projects that have ground-disturbing activity must develop and submit a Construction Stormwater Control and Soil Management Plan. The plan must outline how the project will apply BMPs in 18 specified categories identified in the manual to minimize project impacts, protect the public drainage system and receiving waters, prevent erosion and sedimentation, and manage pollution-generating activities and sources. The requirements of this plan are similar to those of the construction stormwater pollution prevention plan required under Ecology's NPDES Construction Stormwater General Permit provisions; the City-required plan can be modified to meet the NPDES requirements.
- **Development.** Development projects that disturb certain ground area thresholds are required to install permanent stormwater management systems to mitigate potential impacts from changes to the site runoff. These required stormwater management measures are designed to minimize pollution at the source, remove or reduce the amounts of pollutants in the stormwater before it enters the receiving water, or manage the rate at which stormwater flows into a receiving water, the separated storm system, or the combined sewer system. Most development associated with the plan alternatives would likely require on-site (within the developed parcel) stormwater management (where

determined feasible based on the project design), which includes controls like infiltration trenches, rain gardens, or permeable pavements. However, the plan alternatives would likely not include development that would trigger flow control facilities (like stormwater ponds or vaults) or water quality treatment facilities (like media filtration facilities). These Stormwater Manual requirements are summarized in **Exhibit 3.1-17**.

Exhibit 3.1-17. Seattle Stormwater Manual—Requirement Summary

Project Type[1]	Soil Amendment	On-site Stormwater Management	Flow Control and Water Quality Treatment
Single-Family Residential (SMC 22.805.030) Trail and Sidewalk (SMC 22.805.040) Parcel-Based (SMC 22.805.050)	Retain and protect undisturbed soil; and amend all disturbed or compacted soil with organic matter.	For projects where either the total new plus replaced hard surface is generally at least **1,500 square feet** (**750 square feet** for lots created in 2016 or after; **2,000 square feet** for trail and sidewalk) or the land disturbing activity is **7,000 square feet** or more.	Not required
Roadway (SMC 22.805.060)	Retain and protect undisturbed soil; and amend all disturbed or compacted soil with organic matter.	For **2,000 square feet** or more of new plus replaced hard surface or **7,000 square feet** or more of land disturbing activity.	Flow control is typically required for projects that change **5,000 square feet** or more of hard surfaces (plus other thresholds) that discharge to wetlands, creek basins, small lakes, or a capacity-constrained system. Water quality required for projects not discharging to the public combined sewer that generally change **5,000 square feet** or more of hard surfaces (plus other thresholds).

Notes: 1. Project types are shown for comparison. Single-family residential, sidewalk, and other parcel-based projects are those most likely to be associated with the alternatives. Roadway changes are not expected to be included in most of the development projects. Other project types may apply.
Source: Seattle, 2021.

Shoreline Master Program—SMC 23.60A.

The City prohibits any development in designated shoreline areas (see **Exhibit 3.1-9**) without a review by the City that the development is consistent with the Seattle Shoreline Master Program outlined in SMC23.60A. The restrictions apply even if no shoreline substantial development permit is required. Most of the boundaries and elevation restrictions in the Shoreline Master Program are based on the Ordinary High-Water Mark (the highest mark on the bank of a water body that presents scientific features of the regular presence of water).

Critical Areas Ordinance—SMC 25.09

The City prohibits any development in critical land areas (see **Exhibit 3.1-2**) without a review by the City that the development is consistent with the Critical Areas Ordinance outlined in SMC 25.09. In most cases, the types of activities that may be included as part of development in critical areas are restricted. Also, certain engineering, geotechnical, biological, or other scientific studies are often required before beginning work to determine areas that may require heightened protections, potential risks to areas deemed suitable for development, and

appropriate mitigation measures. In addition, often when work is allowed it is restricted to certain portions of the critical area behind designated buffers. Subsections of the Critical Area Code pertain to the following protected and specially regulated lands:

- SMC 25.09.080—Landslide-Prone Areas
- SMC 25.09.090—Steep Slope Erosion Hazard Areas
- SMC 25.09.100—Liquefaction-Prone Areas
- SMC 25.09.110—Peat Settlement-Prone Areas
- SMC 25.09.160—Wetlands and Wetland Buffers
- SMC 25.09.200—Fish and Wildlife Habitat Conservation Areas
- SMC 25.09.220—Abandoned Landfills

~~Through compliance with the Critical Areas Ordinance, it is expected that potential risk of impacts to the above types of protected and specially regulated lands would be minimized or avoided.~~

Emergency Preparedness for Earthquakes & Other Events

- Seattle Building Code provides minimum requirements regarding emergency preparedness for design and construction of new buildings. Seattle has adopted the 2021 International Building Code, with amendments effective as of November 15, 2024.
- Seattle Resolution 32033 establishes a framework for a phased-in mandatory retrofit ordinance for Seattle's 1,100 unreinforced masonry buildings (URMs).
- Seattle Resolution 32111 directs SDCI to use the Draft URM Retrofit Technical Standard to inform voluntary URM retrofit legislation.
- Seattle has a suite of plans updated regularly by the Office of Emergency Management. Currently, the City has published Seattle 2024-2026 Citywide Emergency Management Program Strategic Plan. The City also maintains Emergency Management Accreditation Program certification.
- City of Seattle, 2021-2026 All-Hazards Mitigation Plan
- Seattle-King County Public Health preparedness and response plans.

Other Potential Mitigation Measures

The following mitigation measures are not part of the alternatives but are recommended for consideration by the City. These measures would help to further address existing impacts on earth and water resources associated with overall urban development in Seattle.

- Continued implementation of SDOT policy to avoid adding or expanding roadways through transit and other approaches.
- Strengthen critical areas ordinances and restore critical area buffers.
- Update the Shoreline Master Program to increase sea-level rise resiliency actions (such as construction of barriers or property acquisitions) by basing boundaries and elevation

restrictions on the Mean Higher High Water Mark (the average of the higher daily tides) or some other metric higher than the Ordinary High Water Mark.

- Install updated stormwater controls on roadways, which are not likely to be upgraded as part of the parcel redevelopments included in the alternatives.
- Continue research and implementation of innovative stormwater best management practices, especially those focused water quality treatment in the most urban areas.
- Implement the Puget Sound Partnership Action Agenda and Water Resource Inventory Area Salmon Recovery/Habitat Protection plans.
- Continue to implement PSRC's Four-Part Strategy to reduce greenhouse gas emissions.
- Implement the One Seattle Climate & Environment Element. Regarding overall Comprehensive Plan and Climate & Environment Element implementation, the City will develop a progress report by 2029 (RCW 36.70A.130(9).
- Evaluate and implement Climate Resilience Opportunities in the Seattle Climate Vulnerability Assessment, July 2023.
- Complete and implement Citywide Resilience Hub Plan.
- Complete and implement Floodplain Development Regulations Update which includes regulations to increase the elevation for construction from 2-feet to 3-feet above base flood elevation to account for sea level rise.
- Update 2013 Climate Action Plan, scheduled for mid-2026.
- Update Hazard Mitigation Plan every 6 years.

3.1.4 Significant Unavoidable Adverse Impacts

As discussed in **Section 3.1.1**, landcover across most of the city has been extensively modified for over a century by development, which has already resulted in long-term impacts to earth and water resources. Redevelopment of these areas associated with every ~~project~~ alternative would be required to install permanent stormwater management systems to mitigate potential impacts from changes to the site runoff. These required stormwater management measures are designed to minimize pollution at the source; remove or reduce the amounts of pollutants in the stormwater before it enters the receiving water; or manage the rate at which stormwater flows into a receiving water, the separated storm conveyance system, or the combined sewer system. Furthermore, the comprehensive future planning associated with the ~~project~~ alternatives that would focus growth in the city's already developed area as opposed to allowing that same growth to impact more rural, undeveloped areas is also expected to be beneficial to earth and water resources. Therefore, no significant unavoidable adverse impacts to earth and water resources are expected.

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3.2 Air Quality & GHG Emissions



Source: City of Seattle, 2023.

This section evaluates the air quality impacts of implementing the alternatives considered in this EIS. The analysis focuses on two criteria air pollutants: carbon monoxide (CO) and particulate matter (PM) resulting from changes in land uses and transportation patterns. It also considers other criteria air pollutants such as ozone precursors (reactive organic gases, ROGs, and oxides of nitrogen, NOx) and Toxic Air Pollutants (TAPs).

This EIS examines potential air quality issues at a regional level. This analysis evaluates air quality and potential impacts on a citywide cumulative basis and, where appropriate, according to the EIS analysis areas. Transportation sources (fossil-fueled cars, trucks, trains, buses, etc.) can contribute to heightened localized concentrations of certain air pollutants. Therefore, for TAPs and fine particulate matter ($PM_{2.5}$), localized analyses are provided to the degree feasible to identify potential public health impacts from locating new "sensitive receptors" (such as residences) near to substantial sources of these pollutants within transportation corridor areas.

This section also provides an analysis of how implementation of the alternatives evaluated may contribute to global climate change through the emission of greenhouse gases (GHGs). Transportation systems contribute to climate change primarily through the emissions of certain greenhouse gases (CO_2, CH_4 and N_2O) from the combustion of nonrenewable energy sources (primarily gasoline and diesel fuels) used to operate passenger, commercial, and transit vehicles. Land use changes contribute to climate change through construction and operational use of electricity and natural gas, water, and waste production.

Consistent with the above descriptions, the thresholds of significance utilized in this impact analysis include:

- Air Pollution: Growth concentrated in areas with high exposure to air pollution.
- Per Capita GHG emissions: Increase in GHG emissions on a per capita basis.
- Consistency with other efforts: Actions would prevent or deter statewide, regional, or local efforts to reduce GHG emissions.

Data & Methods

The project team collected data from the following sources to support analysis of existing air quality conditions and potential effects of the ~~project~~ alternatives:

- U.S. Environmental Protection Agency Greenbook (EPA, 2021)
- Puget Sound Clean Air Agency (PSCAA) and Ecology Air Monitoring Network
- 2016-2021 PSCAA Air Quality Data Summaries (PSCAA)
- 2020 Community Greenhouse Gas Emissions Inventory (Seattle, 2022)
- Washington Department of Ecology Air Quality Standards and Greenhouse Gas Emissions Inventory (Ecology, 2022a and 2022b)

3.2.1 Affected Environment

Current Policy & Regulations

Air quality in the Puget Sound region including Seattle, is regulated and enforced by federal, state, and local agencies including the Environmental Protection Agency (EPA), Washington State Department of Ecology (Ecology), and the Puget Sound Clean Air Agency (PSCAA). Each of these agencies has their own role in air quality regulation and monitoring.

U.S. Environmental Protection Agency

The Clean Air Act, established in 1970 and amended in 1977 and 1990, was created to protect human health and the environment from air pollutants. The Clean Air Act required the EPA to establish National Ambient Air Quality Standards (NAAQS) to limit common and widespread pollutants. The six criteria pollutants are: carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO_2), ozone (O_3), particulate matter (PM), and sulfur dioxide (SO_2). Particle pollution is differentiated based on the size of particulate matter; permissible levels of both PM_{10} (particles equal to or less than 10 microns in diameter) and $PM_{2.5}$ (particles that are less than or equal to 2.5 microns in diameter) have been established as part of the NAAQS.

These NAAQS are monitored according to primary and secondary standards. Primary standards relate to the effect on sensitive populations such as children, the elderly, or those with respiratory or other health conditions, while secondary standards relate to the public welfare, such as damage to crops, vegetation, and buildings. Standards are periodically reviewed and revised, with the most recent national standards listed in **Exhibit 3.2-1** below.

Exhibit 3.2-1. National Ambient Air Quality Standards

Pollutant	Primary/ Secondary	Averaging Time	Level	Measurement Criteria
Carbon Monoxide (CO)	Primary	8 Hours	9 ppm (10.31 mg/m³)	Not to be exceeded more than once per year
		1 Hour	35 ppm (40.08 mg/m³)	
Lead (Pb)	Primary and Secondary	Rolling 3-Month Average	0.15 µg/ m³	Not to be exceeded
Nitrogen Dioxide (NO_2)	Primary	1 Hour	100 ppb (188.10 µg/m³)	98th percentile of 1-hour daily maximum concentrations, averaged over 3 years
	Primary and Secondary	1 Year	53 ppb (99.69 µg/m³)	Annual mean
Ozone (O_3)	Primary and Secondary	8 Hours	0.070 ppm	Annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years

Pollutant	Primary/ Secondary	Averaging Time	Level	Measurement Criteria
$PM_{2.5}$	Primary	1 Year	12.0 µg/m³	Annual mean, averaged over 3 years
	Secondary	1 Year	15.0 µg/m³	Annual mean, averaged over 3 years
	Primary and Secondary	24 Hours	35 µg/m³	98th percentile, averaged over 3 years
PM_{10}	Primary and Secondary	24 Hours	150 µg/m³	Not to be exceeded more than once per year on average over 3 years
Sulfur Dioxide (SO_2)	Primary	1 Hour	75 ppb (196.45 µg/m³)	99th percentile of 1-hour daily maximum concentrations, averaged over 3 years
	Secondary	3 Hours	0.5 ppm (1309.63 µg/m³)	Not to be exceeded more than once per year

Source: Ecology, 2022a.

The NAAQSs set limits on the level of the criteria pollutants in the air over specified time periods. These ambient air quality standards are designed to protect people that are most susceptible to respiratory distress, including children, the elderly, and people with compromised health or who engage in strenuous outdoor exercise. EPA designates areas that do not meet the NAAQS for one or more criteria as non-attainment areas. Areas that were once designated non-attainment areas but have since achieved the NAAQS are classified as maintenance areas, while areas that have air pollution levels below the NAAQS are classified as attainment areas. States must develop plans to reduce emissions in non-attainment areas to bring measurements of the criteria pollutants back into compliance with EPA standards.

The Clean Air Act also requires the EPA to regulate 188 hazardous air pollutants (HAPs), also known as air toxics, from both mobile and stationary sources. HAPs are pollutants known or suspected to cause cancer or other serious health effects or have adverse environmental effects. EPA later identified 21 of these air toxics as mobile source air toxics (MSATs) and then extracted a subset of seven priority MSATs: benzene, formaldehyde, diesel particulate matter/diesel exhaust organic gases, acrolein, naphthalene, polycyclic organic matter and 1,3-butadiene. EPA enforces standards for controlling the emissions of HAPs from various sources within different industry groups, also known as source categories. Exposure to these pollutants in high concentrations for long durations increases the risk of cancer, damage to the immune system, neurological problems, reproductive, developmental, respiratory and other serious health problems.

The first phase of regulatory standards EPA develops for HAP sources are maximum achievable control technology (MACT) standards based on the level of emission control achieved by low-emitting sources in an industry. The second phase for controlling HAPs is a risk-based approach that occurs within eight years of the initial implementation of MACT standards. This residual risk review assesses the need for more health-protective standards.

The Clean Air Act is also the basis of most emissions-related regulations across the country, and has helped reduce GHGs from power plants, aircraft, and motor vehicles among other sources. EPA enacts standards for vehicle fuel efficiency and emissions and, as of December 31, 2021, has set the strictest standards for passenger vehicles and light-duty trucks. From model year (MY) 2023 to 2026, the stringency requirements were increased year-to-year, and the path forward from MY 2026 is set to continue that trend of tighter requirements. Fleetwide, MY 2026 vehicles are projected to produce 161 grams of CO_2 per mile, compared to 208 grams of CO_2 per mile as stated in the 2020 EPA regulations (NHTSA, 2020). Furthermore, MY 2026 vehicles will have a fleetwide fuel efficiency of 40 miles per gallon (MPG) compared to the 32 MPG required by 2020 regulations. EPA is also currently finalizing a Clean Trucks Plan to establish more stringent emissions standards on heavy-duty vehicles starting in MY 2027, specifically targeting NO_X emissions from diesel-powered trucks. EPA also establishes emissions standards from other mobile sources of pollution such as aircraft, aligning with the International Civil Aviation Organization to reduce GHG emissions in commercial aviation and large business jets.

Washington State

Washington Department of Ecology (Ecology) regulates over 430 toxic air pollutants from commercial and industrial sources in Washington state, prioritizing 21 of them due to the increased health risk and prevalence from common sources such as diesel emissions and wood smoke. Ecology is also responsible for monitoring statewide air quality and enforcing federal EPA standards through a State Implementation Plan (SIP), which includes Attainment SIPs (when an area doesn't meet NAAQS, i.e. non-attainment areas) and Maintenance SIPs (when an area must meet NAAQS for 20 years after a period of non-attainment). These SIPs also include specific state plans to address certain issues, such as the Regional Haze Plan, Smoke Management Program, and the Transportation Conformity Plan (TCP). The TCP ensures federal transportation funds support roadway and transit activities that align with SIPs for air quality. Attainment and Maintenance SIPs are also required to include enforceable limits on total pollution from all transportation sources, called "motor vehicle emissions budgets." These budgets put a cap on the total amount of transportation-related emissions that can be generated, including from projected future demand.

The State of Washington adopted the Climate Commitment Act (CCA) in 2021, which sets a statewide goal of a 95% reduction in carbon emissions by 2050 starting from a 1990 baseline year. One component of the CCA is a cap-and-invest program that caps the total emissions generated by the state and allows emitters to trade excess carbon emission budgets with one another. Emissions from gasoline, on-road diesel, and railroads are considered part of the 75% of "covered emissions" that would be incorporated into the cap-and-invest system. When these allowances are sold, the profits will be reinvested into projects that address air quality issues. The cap-and-invest program began in January 2023.

Washington State is also working to reduce mobile emissions through the 2020 Motor Vehicle Emissions Standards Law, which directs Washington to adopt vehicle emission standards set by the State of California—including the zero-emission vehicle (ZEV) standard, adopted in

November 2021. This requires 100% of all new passenger cars, light-duty trucks, and medium-duty vehicles sold in the state to be ZEVs starting in 2035, as well as setting stricter emission standards on medium- and heavy-duty trucks. Adopted in December 2022, Washington State adopted a new rule that requires new ZEV sales of passenger cars, light-duty trucks, and medium-duty vehicles to 100% starting in 2035.[12] It also requires cleaner, less polluting new heavy-duty internal combustion engines. In 2021, Governor Inslee signed the Clean Fuel Standard, which requires fuel suppliers to gradually reduce the carbon intensity of transportation fuels (gasoline, diesel) to 20% below 2017 levels by 2038.

Puget Sound Clean Air Agency

The Puget Sound Clean Air Agency (PSCAA) was formed in 1967 under the Washington Clean Air Act, with the authority to create regulations and to permit stationary air pollutant sources and construction emissions within King, Kitsap, Pierce, and Snohomish Counties. PSCAA contributes to statewide SIPs and adopted an updated Strategic Plan in January 2023. The updated Strategic Plan outlines goals and objectives through the year 2030. These Plans set goals and standards to implement a long-term vision for air quality and climate within the region. PSCAA also operates 20 ambient air quality monitoring stations throughout its four-county jurisdiction, and while most standards are in-line with Ecology and the EPA, after convening a "Particulate Matter Health Committee" in 1999, the PSCAA adopted a stricter health goal of 25 $\mu g/m^3$ for $PM_{2.5}$ versus 35 $\mu g/m^3$ in a 24-hour period.

City of Seattle

The City of Seattle was the first city in the United States to adopt a green building goal for all new municipal facilities, and in 2001 the City created a Leadership in Energy and Environmental Design (LEED) incentive program for new private projects. In 2011, the Seattle City Council adopted Resolution 31312, a long-term climate protection vision for Seattle with the goal of achieving net zero GHG emissions by 2050. In pursuit of this goal, in 2013 the City adopted the Climate Action Plan (CAP) to outline reduction targets for GHG emissions and to support City goals of building vibrant neighborhoods, driving economic prosperity, and furthering social equity. The plan identifies five main targets to be achieved by 2030, using the year 2008 as a baseline:

- 20% reduction in vehicle miles traveled;
- 75% reduction in GHG emissions per mile traveled by Seattle vehicles;
- 10% reduction in commercial building energy use;
- 20% reduction in residential building energy use; and
- 25% reduction in combined commercial and residential building energy use.

[12] See: https://ecology.wa.gov/Air-Climate/Reducing-Greenhouse-Gas-Emissions/ZEV#.

The Sustainable Buildings and Sites Policy (established by Resolution 31326) sets goals for City-owned properties to maximize the environmental quality, economic vitality, and social health of the City through design, construction, operation, maintenance, renovation, and decommissioning of City-owned buildings and sites.

Following the U.S.'s withdrawal from the Paris Climate Agreement in 2017, the City Council adopted Resolution 31757, directing the Office of Sustainability and Environment to identify additional actions necessary to limit global warming to an additional 1.5 degrees Celsius. Near-term priorities identified in the 2018 Climate Action Strategy are:

- Improving mobility through equitable road pricing policies;
- Passing of a new electric vehicle readiness ordinance;
- Creating a map of optimal distribution of an EV charging infrastructure;
- Converting 18,000 homes from heating oil to electric heat pumps;
- Doubling existing budget allocation for reducing energy in municipal buildings with the goal of reducing energy use by 40%;
- Scaling pay-for-performance efforts[13] and piloting innovative utility programming; and
- Providing programs and incentives to spur improved energy efficiency and reduced carbon emissions.

The City of Seattle also enacted the Green New Deal Resolution (Res 31895), with Mayor Jenny Durkan introducing the Green New Deal Executive Order (EO-2020-01) on January 8, 2020. Together, the resolution and executive order direct: (1) all City departments to work together with the Green New Deal Oversight Board, the Environmental Justice Committee, and other key stakeholders to establish goals and actions that advance the vision of a climate-pollution free city; (2) the Office of Sustainability & Environment (OSE) to work with City departments to identify actions to achieve the goals of the Green New Deal; (3) the OSE to work with Office of Intergovernmental Relations and the Mayor's Office to engage stakeholders on collaborative efforts to develop additional City policies, inform and support necessary funding and investments, and advance opportunities for partnership on actions that achieve the goals of the Green New Deal; (4) every new or substantially altered municipal building shall operate without fossil fuel systems and appliances (e.g., space heating and cooling, water heating, or cooking); (5) the OSE to work with stakeholders and City departments to determine key indicators that assist in the understanding of emissions trends; and (6) the Green New Deal team shall report progress on an annual basis.

The Green New Deal Oversight Board, established through Ordinance 125926, consists of representatives passionate about advancing an equitable transition to a clean energy economy and centering frontline communities and workers most impacted by climate change. The Green New Deal Oversight Board was entrusted with developing a workplan that:

[13] To address the "hard to reach" energy savings, Seattle City Light is developing programs specifically aimed at enabling greater levels of energy efficiency depth in buildings. Incentive payments are made over time based on measured energy savings and allow participants to bundle multiple projects and measures across capital, operational & maintenance, and behavioral improvements.

- Establishes a definition of what constitutes a policy, program or project that advances a Green New Deal for Seattle;
- Provides proposals for the design of new policies, programs, and projects and for modifications to existing policies, programs and projects to the Mayor, City Council, and City departments to advance a Green New Deal for Seattle;
- Supports the planning and implementation of individual City Departmental actions, policies, programs, and practices, to make Seattle climate-pollution free by 2030;
- Provides recommendations on City budget priorities and priority City actions; and
- Coordinates efforts with City departments and existing committees, boards, and commissions.

Executive Order 2021-09 (Driving Accelerated Climate Action) calls for all municipal buildings to operate without fossil fuel systems and appliances no later than 2035. In addition, EO 2021-09 calls for the acceleration of GHG emissions reduction from the city's transportation sector.

To reduce greenhouse gas emissions in the transportation sector, the City of Seattle adopted Executive Order 2018-02, which aims to have 100% of the City's fleet fossil-fuel free by 2030. This would mean rapid fleet electrification, or conversion to biofuels or renewable diesel/gasoline for municipal fleet vehicles.

Climate & Air Quality

Air quality is affected by pollutants from both natural and manmade sources. Vehicles and equipment that burn fossil fuels are typically among the largest contributors to transportation-related emissions and can contribute to regional and localized concentrations of CO, PM, NO_2, and O_3. State and federal standards regulate these pollutants along with the two other criteria pollutants (SO_2 and lead). The Puget Sound region is currently in attainment for all six criteria pollutants (Ecology, 2022a).

The City of Seattle is in the Puget Sound lowland. Buffered by the Olympic and Cascade mountain ranges and the Puget Sound, the lowland has a relatively mild, marine climate with cool summers and mild, wet, and cloudy winters.

The prevailing wind direction in the summer is from the north or northwest. The average wind speed is less than 10 miles per hour. Persistent high-pressure cells often dominate summer weather and create stagnant air conditions. This weather pattern sometimes contributes to the formation of photochemical smog.[14] During the wet winter season, the prevailing wind direction is from the south or southwest.

There is sufficient wind most of the year to disperse air pollutants released into the atmosphere. The region can be affected by wildfire smoke in the late summer and fall. Data

[14] See explanation: https://education.nationalgeographic.org/resource/smog/.

from these "exceptional events that are beyond the ability of air agencies to control" are excluded by the EPA for regulatory actions but are included in PSCAA and Ecology data collection.

Apart from wildfire events, air pollution is usually most noticeable in the late fall and winter, under conditions of clear skies, light wind and a sharp temperature inversion. Temperature inversions occur when cold air is trapped under warm air, thereby preventing vertical mixing in the atmosphere. These can last several days. If poor dispersion persists for more than 24 hours, the PSCAA can declare an "air pollution episode" or local "impaired air quality."

Pollutants of Concern

The largest contributors of pollution related to transportation construction projects and changes to travel patterns are construction equipment and vehicles traveling on roadways. The main pollutants emitted from transportation and non-transportation sources are CO, ozone precursors (VOC and NO_x), PM, GHGs, and HAPs. This section describes these pollutants and their effects on public health and the environment.

Carbon Monoxide (CO)

CO is an odorless, colorless, tasteless gas formed by the combustion of fuels containing carbon, with most CO emissions coming from motor vehicles, industrial activity, and wood burning. CO enters the bloodstream through the lungs and reduces the oxygen-carrying capacity of blood, affecting the function of organs and tissues. People with existing cardiovascular or respiratory issues may experience chest pains, nausea, fatigue, and dizziness when exposed to high levels of CO, though even healthy individuals may experience issues with alertness depending on the amount of exposure. As the most common source of CO emissions is motor vehicles, high concentrations are most present in urban areas, and it is the urban areas of Washington that have breached NAAQS in the past 30 years. The urban areas within Puget Sound were on attainment maintenance plans for CO from 1996 to 2016.

Nitrogen Dioxide (NO_2) & Ground-Level Ozone (O_3)

NO_2 is a red/brown reactive gas formed from the chemical reaction of nitrogen oxide (NO), hydroperoxy radical (HO_2), and alkylperoxy radical (RO_2) in the atmosphere. NO_2 and other nitrogen oxides (known as NO_x) can combine with volatile organic compounds (VOCs) in the atmosphere to form ozone. Vehicles such as automobiles and construction equipment are the most common sources of NO_X, along with marine vessels and industrial boilers and processes. While Washington has not violated NAAQS for NO_2, Ecology continues to measure NO_X levels at three sites within Seattle, as NO_X is a key contributor to ozone and fine particulate matter.

Ozone itself is a secondary air pollutant, produced in the atmosphere through a complex series of photochemical reactions involving VOCs (also sometimes referred to by some regulating agencies as reactive organic gases, or ROG), NO_X and sunlight. Ozone precursors are created

from combustion processes and the evaporation of solvents, paints, and fuels. Ozone levels are usually highest in the afternoon because of the intense sunlight and the time required for ozone to form in the atmosphere. Elevated concentrations of ground-level ozone can cause reduced lung function, respiratory irritation, and can aggravate asthma. Ozone has also been linked to immune system impairment. People should limit outdoor exertion if ozone levels are elevated, as even healthy individuals may experience respiratory issues on a high-ozone day. Ground-level ozone can also damage forests and agricultural crops, interfering with their ability to grow and produce food.

Currently all of Washington State is in attainment for NAAQS for ozone, with a complete maintenance plan for the Central Puget Sound Region in 2016.

Particulate Matter (PM_{10} & $PM_{2.5}$)

PM is a class of air pollutants that consists of a mixture of extremely small particles and liquid droplets such as acids, organic chemicals, metals, and soil or dust particles. PM takes three main forms depending on density—PM_{10} is considered "Coarse", with a diameter of 10µm or less. "Fine" particulate matter is also known as $PM_{2.5,}$ due to its diameter being 2.5µm or less. Lastly there are "Ultrafine" particles with a diameter less than 0.1µm, though these are not factored into EPA attainment designations. Particulate matter is a result of combustion, such as emissions from vehicles and industry, and from wood burning including wood stoves, fireplaces, and wildfires. In addition, particulate matter is generated from brake and tire wear from vehicles. High levels of particulate matter—especially $PM_{2.5}$—can result in a multitude of health impacts, including an increase in hospital visits for cardiovascular and respiratory problems, especially for sensitive populations. Decreased visibility may also derive from increased levels of particulate matter.

Currently, all of Washington is meeting air quality standards for both fine ($PM_{2.5}$) and coarse (PM_{10}) particulate matter, with maintenance plans for most of the state being completed recently. While there were extended periods of time when NAAQS were exceeded for particulate matter due to wildfires, the EPA allows data from days "influenced by exceptional events that are beyond the ability of air agencies to control" to be excluded for regulatory actions.

Other Pollutants

Since the phasing out of lead from gasoline in the U.S. in the 1980s, vehicle travel is no longer a major source of lead emissions, and lead emissions are not associated with changes in traffic volumes or travel patterns from implementation of the Seattle Comprehensive Plan.

SO_2 is produced by burning fuels that contain sulfur such as coal, oil, and diesel, or processing metals that contain sulfur. Historically, Washington has maintained very low measured levels of SO_2 and stopped most monitoring of SO_2 levels in the air. After EPA adopted a new SO_2 standard in 2010, Ecology evaluated ambient SO_2 levels throughout Washington, finding that all counties met that standard, apart from one area in Whatcom County (EPA, 2017). With the addition of

new emission control technologies, SO_2 from gasoline, diesel, and transportation-related sources have fallen over the past few decades due to a reduction of sulfur content in gasoline and diesel by nearly 90%. Changes in traffic volumes or travel patterns based on growth described in the Seattle Comprehensive Plan are not associated with changes in SO_2 generation.

Air toxic pollutant emissions or hazardous air pollutants (HAPs) are produced from both stationary and mobile sources, notably from motor vehicles in Seattle. EPA has been able to reduce benzene, toluene, and other air toxics emissions from mobile sources by placing stringent standards on tailpipe emissions and requiring the use of reformulated gasoline. However, changes in traffic volumes or travel patterns based on growth described in the Seattle Comprehensive Plan are likely to generate additional air toxics.

Greenhouse Gases & Climate Change

Generally, climate change can be described as the changing of the Earth's climate caused by natural fluctuations and anthropogenic activities (i.e., activities relating to, or resulting from the influence of human beings) that alter the composition of the global atmosphere. Changes in Earth's climate can include temperature, precipitation patterns; increases in ocean temperatures, sea level, and acidity; melting of glaciers and sea ice; changes in the frequency, intensity, and duration of extreme weather events and shifts in ecosystem characteristics, like the length of the growing season, timing of flower blooms, and migration of birds. Global mean temperatures in the United States have warmed during the 20th century and continue to warm into the 21st century.

The accumulation of GHGs in the atmosphere is a driving force in climate change. GHGs are gases that naturally trap heat by preventing the expulsion of solar radiation that hits the Earth, limiting the amount of radiation that is reflected back into space. This trapping of heat, known as the "greenhouse effect", keeps the earth's surface habitable. However, anthropogenic activities increase the concentrations of additional GHGs in the atmosphere, intensifying the natural greenhouse effect and increasing global average temperatures.

The principal GHGs of concern include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), sulfur hexafluoride (SF_6), perfluorocarbons (PFCs) and hydrofluorocarbons (HFCs). These GHGs have a long atmospheric lifespan (1 year to several thousand years), and their potential to trap heat varies widely. Anthropogenic activities that release GHGs of concern include the combustion of fossil fuels for transportation, heating, and electricity generation. Other activities such as agricultural processes, industrial processes, waste decomposition, and deforestation all contribute to climate change.

Based on data compiled by the EPA, GHG emissions from human activities in the United States in 2020 decreased by 20% from 2005, but only 7% compared to 1990 levels. Global data compiled by the EPA show a 43% increase of net GHG emissions between 1990 and 2015. Despite recent reductions, the total warming effect from greenhouse gases produced by human activity to the Earth's atmosphere increased by 45% between 1990 and 2019 (EPA, 2022). The

National Oceanic and Atmospheric Administration's (NOAA) 2021 Annual Climate Report indicates that combined global land and ocean temperatures have increased an average of 0.14 degrees Fahrenheit per decade since 1880 and an average of 0.32 degrees Fahrenheit since 1981 (NOAA, 2022).

Ecology estimates that GHG emissions in Washington State peaked in 1999 at 110 million metric tons and declined after the economic recession in 2008 but have been rising gradually in recent years. In 2019, Washington State's GHG emissions were at their highest levels since 2007, increasing nearly 7% since 2018 and reaching 102.1 million metric tons (Ecology, 2022b). According to the 2020 Community Greenhouse Gas Emissions Inventory, core citywide emissions consisting of transportation, buildings, and waste sectors were 3,012,800 $MTCO_2e$ in the year 2020 (City of Seattle, 2020). Expanded emissions include sources such as freight transportation and air travel. Expanded emissions in 2020 were 5,087,600 $MTCO_2e$.

Air Quality Information Sources, Monitoring, & Trends

Data from PSCAA, Ecology, and EPA were used to compare criteria pollutant levels over the past three years to current NAAQS as summarized in **Exhibit 3.2-2**. This includes days with excessive wildfire smoke that were excluded from EPA determinations regarding attainment. Therefore, some data points may exceed the NAAQS, but this did not factor into attainment determinations for the State or the region.

Criteria pollutants are measured at four monitoring stations within Seattle: 10th and Weller, Duwamish, South Park, and Beacon Hill. Measured criteria pollutant levels decreased from 2019 to 2021 at all monitoring stations apart from ozone at Beacon Hill, which did not change, and 24-hour averaging $PM_{2.5}$ at Beacon Hill, which increased, but remained below the NAAQS. Both CO and NO_2 levels were consistently higher at the 10th & Weller station in Subarea 4 than at the Beacon Hill station in Subarea 8. On average, measurements for $PM_{2.5}$ with 1-year averaging were highest at the South Park station in Subarea 7, while measurements for $PM_{2.5}$ with 24-hour averaging were highest at the 10th & Weller station in Subarea 4.

Exhibit 3.2-2. Criteria Pollutant Levels in the City of Seattle 2019-2021

Pollutant	Station	Primary/ Secondary	Averaging Time	NAAQS	2019 Value	2020 Value	2021 Value
Carbon Monoxide (CO)	Beacon Hill (Subarea 8)	Primary	8 hours	9 ppm	0.80	1.70	0.60
			1 hour	35 ppm	1.17	1.79	0.77
Carbon Monoxide (CO)	10th & Weller (Subarea 4)	Primary	8 hours	9 ppm	1.10	1.20	1.00
			1 hour	35 ppm	1.50	1.53	1.37
Nitrogen Dioxide (NO_2)	Beacon Hill (Subarea 8)	Primary	1 hour	100 ppb	43.05	42.10	41.16
		Primary and Secondary	1 year	53 ppb	10.56	8.60	9.25
Nitrogen Dioxide (NO_2)	10th & Weller (Subarea 4)	Primary	1 hour	100 ppb	61.30	58.51	53.59
		Primary and Secondary	1 year	53 ppb	18.10	15.81	15.80
Ozone (O_3)	Beacon Hill (Subarea 8)	Primary and Secondary	8 hours	0.07 ppm	0.05	0.05	0.05
$PM_{2.5}$	Beacon Hill (Subarea 8)	Primary	1 year	12 µg/m³	6.57	6.50	5.70
		Secondary	1 year	15 µg/m³			
		Primary and Secondary	24 hours	35 µg/m³	25.80	34.43	26.00
$PM_{2.5}$	10th & Weller (Subarea 4)	Primary	1 year	12 µg/m³	N/A	8.70	7.77
		Secondary	1 year	15 µg/m³			
		Primary and Secondary	24 hours	35 µg/m³	N/A	37.50	30.57
$PM_{2.5}$	Duwamish (Subarea 7)	Primary	1 year	12 µg/m³	8.73	8.9	8.37
		Secondary	1 year	15 µg/m³			
		Primary and Secondary	24 hours	35 µg/m³	31.83	35.60	27.57
$PM_{2.5}$	South Park (Subarea 7)	Primary	1 year	12 µg/m³	9.13	8.80	8.10
		Secondary	1 year	15 µg/m³			
		Primary and Secondary	24 hours	35 µg/m³	36.73	26.40	16.93
PM_{10}	Beacon Hill (Subarea 8)	Primary and Secondary	24 hours	150 µg/m³	N/A	58.67	32.33

Sources: PSCAA, 2019a; PSCAA, 2020; PSCAA, 2021.

Sources of Air Pollution in Seattle

Citywide

Equipment with heavy-duty fossil fuel burning engines, such as locomotives, large trucks, construction equipment, freighters, cruise ships, and ferries are the main sources of transportation-related air pollution within Seattle, largely due to emissions produced by diesel motors. According to 2019-2020 annual average daily traffic (AADT) roadway data from Washington State Department of Transportation (WSDOT), the roads with the highest percentage of heavy truck traffic within Seattle are sections of I-5, SR-99, SR-519, and SR-522. Ocean-going vessels, harbor support vessels, ferries, and cargo-handling equipment at marine facilities are sources of air pollution along the waterfront, Harbor Island, and in the Duwamish waterway.

Point sources of air pollution within the manufacturing and industrial centers include industrial and non-transportation emissions sources including manufacturing plants, heavy and general industrial facilities, and manufacturing uses. Many point sources require obtaining permits from the PSCAA to operate. Residential communities bordering manufacturing and industrial centers are exposed to increased pollutant emissions due to their proximity to both transportation and point sources of pollution.

Construction equipment use is variable, intermittent, and geographically temporary, being more heavily associated with certain phases (such as earthmoving and grading) of active construction. However, when emissions are examined over a longer time frame, say annually, impacts are fairly constant and ubiquitous on a citywide basis.

Sources of non-transportation-related emissions include energy consumption and solid waste. Energy consumption consists of emissions from consumption of electricity and natural gas. Primary uses of electricity and natural gas within the City would be for space heating and cooling, water heating, ventilation, lighting, appliances, and electronics. Solid waste releases GHG emissions in the form of methane when these materials decompose.

EIS Analysis Areas

The most substantial sources of air pollution in each area of the City are described below.

Area 1

Area 1, located in northwest Seattle, is heavily affected by on-road sources of air pollutants. I-5 runs north-south along the southern section of the eastern boundary of Area 1 and SR-99 runs north-south and transects Area 1. The main source of railway pollutants is from the freight trains that operate on the Burlington Northern Santa Fe (BNSF)-owned tracks that run along the southern, western, and eastern boundaries of Area 1. Industrial uses are located along and adjacent to the southern boundary of the area. (See the map of rail lines in **Section 3.5 Noise**.)

Area 2

Area 2 is located in northeast Seattle and is heavily affected by on-road sources of air pollutants. I-5 runs along the southwestern boundary of and through the northwestern portion of Area 2. In addition, SR-522 runs through the northern portion of Area 2. The main source of railway pollutants is from the freight trains that operate on the BNSF-owned tracks that run along the western boundaries of Area 2. (See the map of rail lines in **Section 3.5 Noise**.)

130th/145th Station Area

The 130th/145th Station Area is located in northern Seattle in Area 2. I-5 transects this area going north-south, and a railway runs through the vicinity of the 130th Street Light Rail Station. No other major sources of air pollution are located within the Area.

Area 3

Area 3, which is located in western Seattle, is heavily affected by on-road and rail sources of air pollutants. SR-99 runs along the eastern boundary of Area 3. The main source of railway pollutants is from the freight trains that operate on the BNSF-owned tracks that run through and along the southwestern boundary of Area 3. Other sources of air pollution include commercial cruise and other non-industrial operations at the Port of Seattle and industrial land uses.

Area 4

Area 4 is located centrally within the City of Seattle and is heavily affected by on-road and rail sources of air pollutants. SR-99 runs through the area and I-5 runs along the eastern boundary. The main source of railway pollutants is from the freight trains that operate on the BNSF-owned tracks that run through Area 4. Another source of air pollution is commercial cruise and other non-industrial operations at the Port of Seattle. (See the map of rail lines in **Section 3.5 Noise**.) Industrial uses are located at the northwestern and southern portions of Area 4.

Area 5

Area 5 is located centrally within the City of Seattle and is heavily affected by on-road sources of air pollutants. I-5 runs along the western boundary, SR-520 runs along the northern boundary, and I-90 runs along the southern boundary of Area 5. The main source of railway pollutants is from a streetcar that operates on the tracks that run through Area 5. (See the map of rail lines in **Section 3.5 Noise**.) Industrial uses are located at the southwestern corner of the Area.

Area 6

Area 6 is located in southwestern Seattle. While Area 6 would be subjected to on-road pollutants from roadways, no major sources of air pollution are located within the Area. SR-509 runs along a relatively small segment of the southeastern boundary of the Area. Sources of railway pollutants are from freight trains that operate on the BNSF-owned tracks that run along

a relatively small segment of the northeastern boundary of Area 6, adjacent to the industrial district operating along the southern portion of the Port of Seattle. (See the map of rail lines in **Section 3.5 Noise**.) The Area is bound to the east by Area 7, which consists primarily of industrial-zoned land.

Area 7

Southern Seattle includes Area 7 which consists primarily of industrial-zoned land and is heavily affected by on-road, rail, maritime, and aviation sources of air pollutants. I-5 runs along the eastern boundary of and SR-509 runs through Area 7. Area 7 is heavily affected by rail operations from BNSF-owned tracks that run through the Area, which includes an intermodal facility and industrial district at the Port of Seattle. (See the map of rail lines in **Section 3.5 Noise**.) The King County International Airport is located in the southwestern portion of Area 7, contributing aviation-related pollutants.

Area 8

Area 8 is located in southeast Seattle and is heavily affected by on-road sources of air pollutants. I-5 runs along the western boundary and I-90 runs along the northern boundary of Area 5. The main source of railway pollutants is from the freight trains that operate on the BNSF-owned tracks that run along the western and northern boundaries of Area 8. (See the map of rail lines in **Section 3.5 Noise**.) Although not located within Area 8, the King County International Airport is located adjacent to Area 8 to the southwest and the Seattle Intermodal facility, which is source of railway pollutants, is located adjacent to the west of Area 8.

Air Toxics

Air toxic pollutant emissions or hazardous air pollutants (HAPs) are of concern in Seattle because of projected growth in vehicle miles traveled. The Puget Sound Regional Council estimates that by 2050, the population of the Puget Sound region will grow by 38% (1.6 million people) to reach a population of 5.8 million people (PSRC 2021), with the highest population increase estimated to be in King County, resulting in increased vehicle miles traveled.

Construction Emissions

Exhaust emissions from diesel off-road equipment represent a relatively small percentage of the overall emission inventory in King County: 0.6% of countywide CO, 7.1% of countywide NO_X, 0.97% of countywide PM_{10}, 2.53% of countywide $PM_{2.5}$, and 0.39% of countywide VOC (EPA, 2017). The primary emissions of concern (greater than 1% contribution) with regard to construction equipment are NO_X and $PM_{2.5}$ (the latter a priority air toxic). NO_X is primarily an air quality concern with respect to its role in (regional) ozone formation and the Puget Sound air shed has long been designated as an attainment area (meeting standards) with respect to ozone.

Sensitive Populations

Sensitive populations are those who are the most at-risk of adverse effects from elevated levels of air pollutants, whether due to age, previous or ongoing illnesses, socioeconomic status (SES), or other conditions such as pregnancy. According to the U.S. EPA, these sensitive groups include people with heart and lung disease, older adults (those 65 years of age or older), children, people with diabetes, and people of lower SES (EPA, 2023). This also includes those experiencing breathing troubles, such as those who have/have had COVID-19, asthma, cystic fibrosis, or other respiratory ailments. Those of lower SES may be more vulnerable to air pollution due to proximity to industrial sources of air pollution, underlying health issues, poor nutrition, stress, and other factors contributing to increased health impacts.

Land uses with populations sensitive to air quality include residential areas, schools, daycare facilities, hospitals, and nursing and convalescent homes. Residential communities that border industrial areas may be at risk of increased impact from pollutants due to their proximity to both transportation and point sources of pollution.

The Washington Environmental Health Disparities Map is used to locate areas with high environmental health risks posed to sensitive populations across the state; see **Exhibit 3.1-12 Environmental Health Disparities** in **Section 3.1 Earth & Water Quality**. The map accounts for pollution measures such as diesel emissions and ozone and proximity to sources of pollution. The goal of the map is to provide insight on prioritization of public investments to buffer environmental health impacts on the state's communities, so that everyone may benefit from clean and healthy air, water, and environments. The map was created with 19 indicators, and these indicators are divided into four themes: environmental exposures, environmental effects, sensitive populations, and socioeconomic factors. The combination of these indicators informs the environmental health disparities map by census tract. The map shows communities that are experiencing a disproportionate share of environmental health burdens and that will need more assistance to reach equitable outcomes, with 1 indicating census tracts with the lowest disparities and 10 indicating tracts with the highest disparities.

According to the Washington Department of Health, living in areas with more environmental hazards and population vulnerabilities is associated with a shorter lifespan, where population in census tracts of rank 1 on average lived 5.3 years longer than those in census tracts with the highest environmental health disparities (rank 10) (Washington Department of Health, n.d.).

Downtown/Lake Union, Capitol Hill/Central District, Duwamish, and SE Seattle rank the highest (in the 8-10 range) compared to the other subareas. The subareas that rank the lowest are NW Seattle and NE Seattle, which have tracts that rank in the 3 to 6 range.

Greenhouse Gas Emissions in Seattle

The City of Seattle conducted a *Community Greenhouse Gas Emissions Inventory* study in 2020, which analyzed emissions data based on the national standards set forth by the International

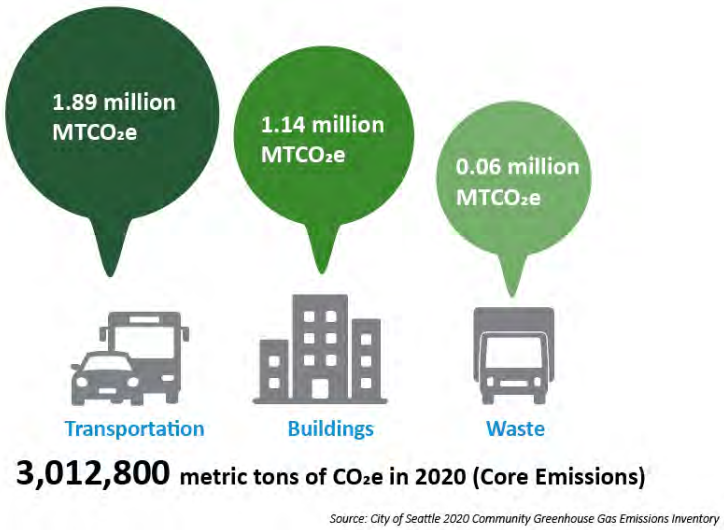
Council for Local Environmental Initiatives (ICLEI)—Local Governments for Sustainability. These standards make it easier to compare Seattle's emissions with other cities and past inventories.

GHGs were divided into core emissions and expanded emissions. Core emissions sources are those that the city can most directly and significantly impact, and most of the city's climate policies and programs are aimed at reducing core emissions. Core emissions include those from transportation, buildings, and waste sectors. Expanded emissions include all core emission sectors as well as additional sectors, subsectors, and categories. The additional category for expanded emissions includes industry-based emissions.

GHGs are measured by metric tons of carbon dioxide equivalents ($MTCO_2e$). The largest amount of core emissions in Seattle was contributed by the transportation sector, at 1.89 million $MTCO_2e$ (62%), followed by the buildings sector at 1.14 million MT, and waste at 0.06 million MT. A total of 3 million MT of CO_2e in core emissions were emitted in the city in 2020. CO_2e emissions in the transportation sector have decreased around 27.7% since 2008, when they measured 2.61 million MT. This decrease in emissions is due in part to improvements in vehicle efficiency standards, a decrease in vehicle miles traveled (VMT), and changes in travel patterns due to the COVID-19 pandemic in 2020.

For core emissions in the transportation sector, emissions are classified by roadway vehicle type as passenger emissions and truck emissions. Passenger emissions accounted for majority of emissions in the transportation sector at 1.68 million $MTCO_2e$, whereas truck emissions contributed only 207,000 $MTCO_2e$. Passenger emissions consist of both single- and high-occupancy vehicles, motorcycles, light trucks, and buses. Truck emissions consist of emissions from commercial trucks including light-, medium-, and heavy-duty commercial trucks (see **Exhibit 3.2-3**).

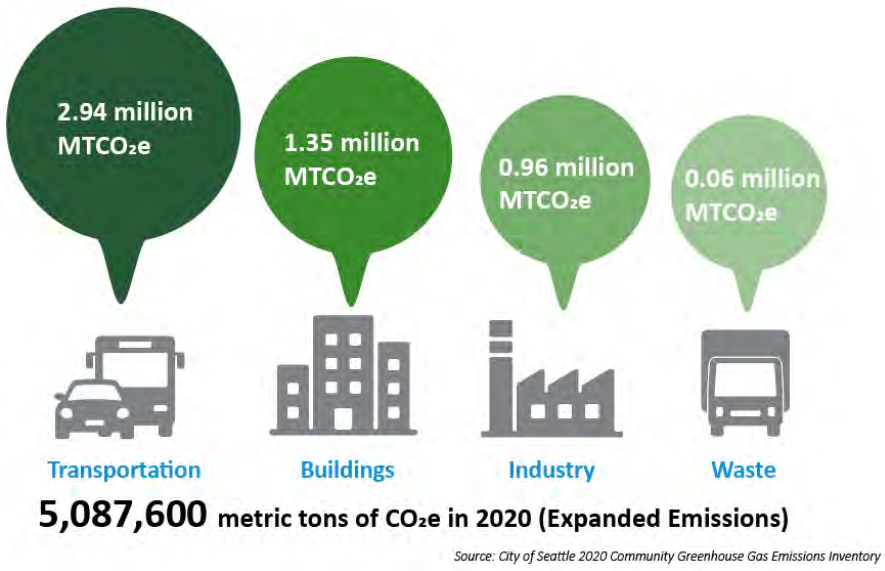
Exhibit 3.2-3. Core GHG Emissions in the City of Seattle



Source: City of Seattle, 2020.

For expanded emissions, the transportation sector also had the highest amount of CO_2e with 2.94 million MT (55%), followed by the buildings sector at 1.35 million MT, industry at 0.96 million MT, and waste at 0.06 million MT. A total of 5 million $MTCO_2e$ was emitted for expanded emissions in the city in 2020 (see **Exhibit 3.2-4**).

Exhibit 3.2-4. Expanded GHG Emissions in the City of Seattle



Source: City of Seattle, 2020.

Expanded emissions in the transportation sector are divided by air, marine, rail, passenger, and trucks. Passenger emissions still accounted for majority of emissions in the transportation sector at 1.68 million mt of CO_2e, while rail had the least amount at 27,000 MT CO_2e. Air transport and the industrial sector together comprised two of the largest sources of core and expanded emissions in 2020, approximately 844,000 mt of CO_2e (15.9% of total) and 962,000 mt of CO_2e (18.0% of total) respectively. Air transportation emissions have seen an uptick since 2008, due to increased economic activity and population growth.

3.2.2 Impacts

Impacts Common to All Alternatives

Construction Related Emissions

Future growth under any alternative would result in development of new residential, retail, light industrial, office, and community/art space. Most development projects in the city would entail demolition and removal of existing structures or parking lots, excavation and site preparation, and construction of new buildings. Emissions generated during construction activities would include exhaust emissions from heavy duty construction equipment, trucks used to haul construction materials to and from sites, worker vehicle emissions, as well as fugitive dust emissions associated with earth-disturbing activities, and other demolition and construction work.

Fugitive dust emissions are typically generated during construction phases. Activities that generate dust include building and parking lot demolition, excavation, and equipment movement across unpaved construction sites. The PSCAA requires dust control measures be applied to construction projects through Article 9, Section 9.15. Of these measures, those applicable to fugitive dust include (1) use control equipment, enclosures or wet suppression techniques, (2) paving or otherwise covering unpaved surfaces as soon as possible, (3) treating construction sites with water or chemical stabilizers, reduce vehicle speeds and cleaning vehicle undercarriages before entering public roadways and, (4) covering or wetting truck loads or providing freeboard in truck loads. In light of these requirements, impacts related to construction dust are concluded to be less than significant.

Criteria air pollutants would be emitted during construction activities from demolition and construction equipment, much of it diesel-powered, trucks used to haul construction materials to and from sites, and from vehicle emissions generated during worker travel to and from construction sites. Emissions are emitted in and around specific construction sites and are therefore dispersed geographically. The use of diesel-powered construction equipment would be temporary and episodic. The duration of exposure would be short and exhaust from construction equipment dissipates rapidly. Construction is temporary and would be transient throughout the site (i.e., move from location to location) and would not generate emissions in a fixed location for extended periods of time.

A number of federal regulations require cleaner off-road equipment. Specifically, the U.S. EPA has set emissions standards for new off-road equipment engines, classified as Tier 1 through Tier 4. To meet the Tier 4 emission standards, engine manufacturers will be required to produce new engines with advanced emission-control. By the time final Tier 4 regulations were fully implemented in 2015, PM and NO_X emissions had been reduced 99% compared to 1996 emissions (MTU, 2010). Consequently, it is anticipated that as the region-wide construction fleet converts to newer equipment the potential for health risks from off-road diesel equipment

will be substantially reduced. So, given the transient nature of construction-related emissions and regulatory improvements scheduled to be phased in, construction related emissions associated with all five alternatives of the Comprehensive Plan would be considered only a minor adverse air quality impact.

Greenhouse Gas Emissions

The scale of global climate change is so large that the impacts from any singular development project or programmatic action, even on the citywide scale of the development alternatives in this ~~Draft~~ Final EIS, would not have an individually discernible impact on global climate change. It is more appropriate to consider impacts on a "cumulative" scale. Thus, this EIS will consider how GHG emissions from future development in Seattle, in combination with emissions across the state, country, and planet to cumulatively contribute to global climate change.

Construction

GHGs would be emitted during construction activities from fossil-fueled demolition and construction equipment, trucks used to haul construction materials to and from sites, and from vehicle emissions generated during worker travel to and from construction sites. Construction and demolition emissions only represent approximately 2.71% of the emissions estimated in the 2020 GHG emissions inventory (City of Seattle, 2020).

Construction-related GHG emissions from any given development project that may occur in the next 20 years would be temporary and would not represent an on-going burden to the City's inventory. However, cumulatively it can be assumed that varying levels of construction activities within the city would be ongoing under any of the Plan alternatives and hence, cumulative construction related emissions would be more than a negligible contributor to GHG emissions within the city.

The City's Climate Action Plan recognizes the relevance of construction related GHG emissions and has included actions to be implemented by 2030 to address them. These include:

- Support new and expanded programs to reduce construction and demolition waste, such as creating grading standards for salvaged structural lumber so that it can be more readily reused;
- Expand source reduction efforts to City construction projects, and incorporate end-of-life management considerations into City procurement guidelines; and
- Phase-in bans on the following construction and demolition waste from job sites and private transfer stations: recyclable metal, cardboard, plastic film, carpet, clean gypsum, clean wood and asphalt shingles.

The City's *2022 Solid Waste Plan Update: Moving Upstream to Zero Waste* aligns its waste-related goals with the sustainability and climate goals of CAP. The 2022 Solid Waste Plan Update emphasizes the elimination or minimization of waste from the start. The 2022 Solid Waste Plan Update includes recommendations to increase public awareness to expand support

of waste prevention and opportunities for reuse. Strategies to reduce waste include, but are not limited to, reducing single-use items, food waste, require all single-use food services to use compostable packaging, and enhance diversion of construction and demolition debris at transfer stations.

Additionally, the West Coast Collaborative, a public-private partnership including the U.S. EPA, equipment manufacturers, fleet owners, state and local governments and non-profit organizations leverages federal funds to reduce emissions from the highest polluting engines. With Ecology and privately owned construction companies, the Collaborative installed diesel oxidation catalysts on construction equipment and trucks, reducing carbon emissions by 121.4 tons annually (West Coast Collaborative, 2023).

Although construction related emissions would not be negligible, because of the combination of regulatory improvements and parts of the Climate Action Plan that are under way, construction related GHG emissions associated with all alternatives would result in minor adverse climate impacts.

Operations—Transportation

Mobile emissions were estimated using the EPA's Motor Vehicle Emission Simulator (MOVES) model. The MOVES model 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 and GHG emissions. Projected vehicle miles traveled (VMT) by passenger vehicles, trucks, and buses were used to estimate criteria pollutant and GHG emissions.

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

- The projected change in VMT
- The projected change in fuel economy of the vehicle fleet

VMT in 2044. Travel demand models predict VMT in future years for various classes of vehicles (e.g., cars, trucks, buses). The model generally assumes continuation of current economic and demographic trends, with minor shifts toward shorter trips and more trips made by modes other than automobile travel. This will reduce VMT per capita, but total VMT in the region would continue to rise modestly due to population and employment growth. If emissions were projected based solely on the increase in VMT, with no changes assumed to fuel economy, emissions under each of the 2044 alternatives would increase compared to existing conditions. However, the trend toward more stringent federal standards means it is reasonable to assume improved fuel economy, and lowered GHG emissions, by 2044.

A mix of land uses is associated with reduced VMT (WSDOT, 2013). Diversity in land uses combined with increased density within an urban area can lead to shorter trip distances and greater use of walking, as well as the reduced need for vehicle ownership. Accessibility to a variety of trip purposes, as in mixed use developments, may induce additional trips; however, these trips are shorter and are more likely to be made by walking than trips in areas where

mixed land uses are not available. Travel demand models include findings about projected VMT in future years for various classes of vehicles (e.g., cars, trucks, buses). The model generally assumes continuation of current economic and demographic trends, with minor shifts toward shorter trips and more trips made by modes other than automobile travel. Improvements in fuel efficiency combined with reductions in VMT would contribute to reductions in emissions.

Fuel Economy in 2044. Federal programs are mandating improved fuel economy, which reduces GHG emissions, for passenger cars and light trucks. Transportation-related emissions in 2044 would be lower as compared to existing conditions due to improvements in fuel economy. The National Highway Traffic and Safety Administration (NHTSA) is responsible for establishing vehicle standards and for revising existing standards. Compliance with Federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. On March 31, 2022, the NHTSA finalized their Corporate Average Fuel Economy (CAFE) standards for model years 2024 to 2026. The final rule requires an industry-wide fuel average of approximately 49 miles per gallon (mpg) for passenger cars and light trucks in model year 2026 by increasing fuel efficiency by 8% annually for model years 2024 and 2025 and 10% for model year 2026 (NHTSA, 2023). The NHTSA estimates that final standards will reduce emissions of CO, VOC, NO_X, and $PM_{2.5}$ emissions attributable to the light-duty on-road fleet dramatically between years 2020 and 2050 (NHTSA, 2022).

As discussed above, Washington State adopted a new rule in December 2022 that requires new ZEV sales of passenger cars, light-duty trucks, and medium-duty vehicles to 100% starting in 2035. It also requires cleaner, less polluting new heavy-duty internal combustion engines. ZEVs do not release tailpipe air pollution. A ZEV continues to run clean throughout its life, unlike a standard petroleum-powered vehicle, which typically pollutes more as it ages and parts wear out. Progress toward 100% ZEV sales in 2035 would increase the rate of registration of ZEVs in Seattle, resulting in reduced tailpipe emissions and the need for charging infrastructure.

Results. All ~~four~~ 2044 alternatives for which VMT data was provided result in roughly the same annual GHG emissions, as shown in **Exhibit 3.2-5**. ~~Alternative 5~~The Preferred Alternative, which includes the most concentrated growth, is expected to have the highest total GHG emissions. Alternative 5, which has the same growth as the Preferred Alternative, has ~~and~~ the lowest GHG per capita among the alternatives. Alternative 1, the No Action Alternative, is expected to have the lowest total GHG emissions and the highest GHG emissions per capita. However, the variation is within approximately one half of one percent. This is because the projected improvements in fuel economy outweigh the projected increase in VMT. Therefore, roadway emissions are considered a minor adverse impact.

Exhibit 3.2-5. Total and Per Capita Citywide Road Transportation Emissions GHG ($MTCO_2e$) and Per Capita Emissions by Alternative

	Existing	Alternative 1	Alternative 2	Alternative 3	Alternative 4*	Alternative 5	Preferred Alternative**
Total	**31,070**	**29,408**	**30,235**	**30,235**	**30,235**	**31,246**	**31,363**
Per Capita	**0.19**	**0.14**	**0.15**	**0.15**	**0.15**	**0.13**	**0.13**

Notes: The Preferred Alternative, along with notes, was added to this exhibit since the Draft EIS—edits made to Alternatives 1–5 are shown in tracks.
* 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.
** Growth 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%.
Source: Kimley-Horn, 2024~~3~~.

Operations—Energy

GHG emissions from electrical use are generated when energy is generated by the non-renewable sources of an electrical supplier such as Seattle City Light. However, Seattle City Light is carbon neutral and, consistent with the City's Climate Action Plan, no emissions related to electricity are assumed because Seattle City Light will maintain its commitment to carbon neutrality.

GHG emissions from natural gas are direct emissions resulting from on-site combustion for heating and other purposes. ~~All-electric space and water heating is required by the 2022 Washington Energy Code. However, all-electric cooking appliances has not been required. According to household end-use consumption data, approximately 13% of natural gas consumption in residential uses is for purposes other than space and water heating (U.S. EIA, 2015).~~ Natural gas usage has been estimated by dividing total natural gas consumption by residential uses in the State of Washington in 2020 ~~(before all-electric space and water heating is required)~~ by the total housing units in the state in 2020 (U.S. EIA, 2023 and U.S. Census, 2020). ~~Based on the assumption that 13% of natural gas consumption is used for purposes other than space and water heating, natural gas consumption has been adjusted accordingly (see **Appendix D** for detailed calculations).~~ GHG emissions from natural gas demand are calculated using the CalEEMod land use model (version 2020.4.0).[15] This model is recognized by the Puget Sound Clean Air Agency as an estimation tool (PSCAA, 2019).

[15] 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.

Operations—Solid Waste

Solid waste-related emissions are generated when the increased waste generated by new development and infrastructure is disposed in a landfill where it decomposes. Future growth within the city would result in an increase in solid waste disposal. GHG emissions associated with solid waste disposal has been estimated using CalEEMod (version 2020.4.0). Increased emissions from solid waste generation were estimated using Ecology solid waste and recycling data (Ecology, 2018). These emissions were then adjusted to account for waste diversion implemented through waste reduction, recycling and composting fostered by the City's carbon-neutral goal target of 70% waste diversion by 2030. Impacts related to energy-generated GHGs would be considered a minor adverse impact.

Equity & Climate Vulnerability Considerations

Exposure to Air Pollution

Future growth and development patterns under Comprehensive Plan growth strategies would affect future residences' (or other "sensitive receptors") relationships to mobile and stationary sources of air toxics and particulate matter $PM_{2.5}$. The degree of potential for adverse impacts on new sensitive receptors would depend on proximity to major sources of these pollutants, the emissions from these sources, and the density of future sensitive development.

Portions of Seattle located along major roadways (freeways and the most-traveled highways) are exposed to relatively high levels of air borne toxics, resulting in high cancer risk values. In 2008, the Washington State Department of Health conducted a study of cancer risks in the Duwamish Valley. Results of the analysis indicate that on-road mobile sources contribute to the highest cancer and non-cancer risks near major roadways over a large area of south Seattle and that risks and hazards are greatest near major highways and drop dramatically at approximately 200 meters (approximately 656 feet) from the center of highways (WSHA, 2008). Modeling indicates increased cancer risks in existing residential areas of up to 800 in one million.[16] Risks above 100 per one million persons (100 excess cancer risk) is a criterion identified by U.S. EPA guidance for conducting air toxic analyses and making risk management decisions at the facility and community-scale level. Risks and hazards drop dramatically in places farther than 200 meters (656 feet) from the center of highways. A similar phenomenon occurs in proximity to rail lines that support diesel locomotive operations. Given this, it would be prudent to consider risk-reducing mitigation strategies. Because the authority to set standards for locomotives and heavy-duty on-road vehicle emissions lies exclusively with the U.S. EPA, the only strategies available to the City for consideration are related to reducing exposure. As discussed above, measures such as setbacks for residential and other sensitive land uses from major traffic corridors and rail lines are effective. Other measures to protect sensitive land uses from being exposed to substantial levels of toxic air contaminants include

[16] These risks should not be interpreted as estimates of disease in the community, only as a tool to define potential risk.

requirements for enhanced air filtration, restricting open spaces and operable windows near to the source of toxic air contaminants, and siting intake vents as far from substantial sources as practicable.

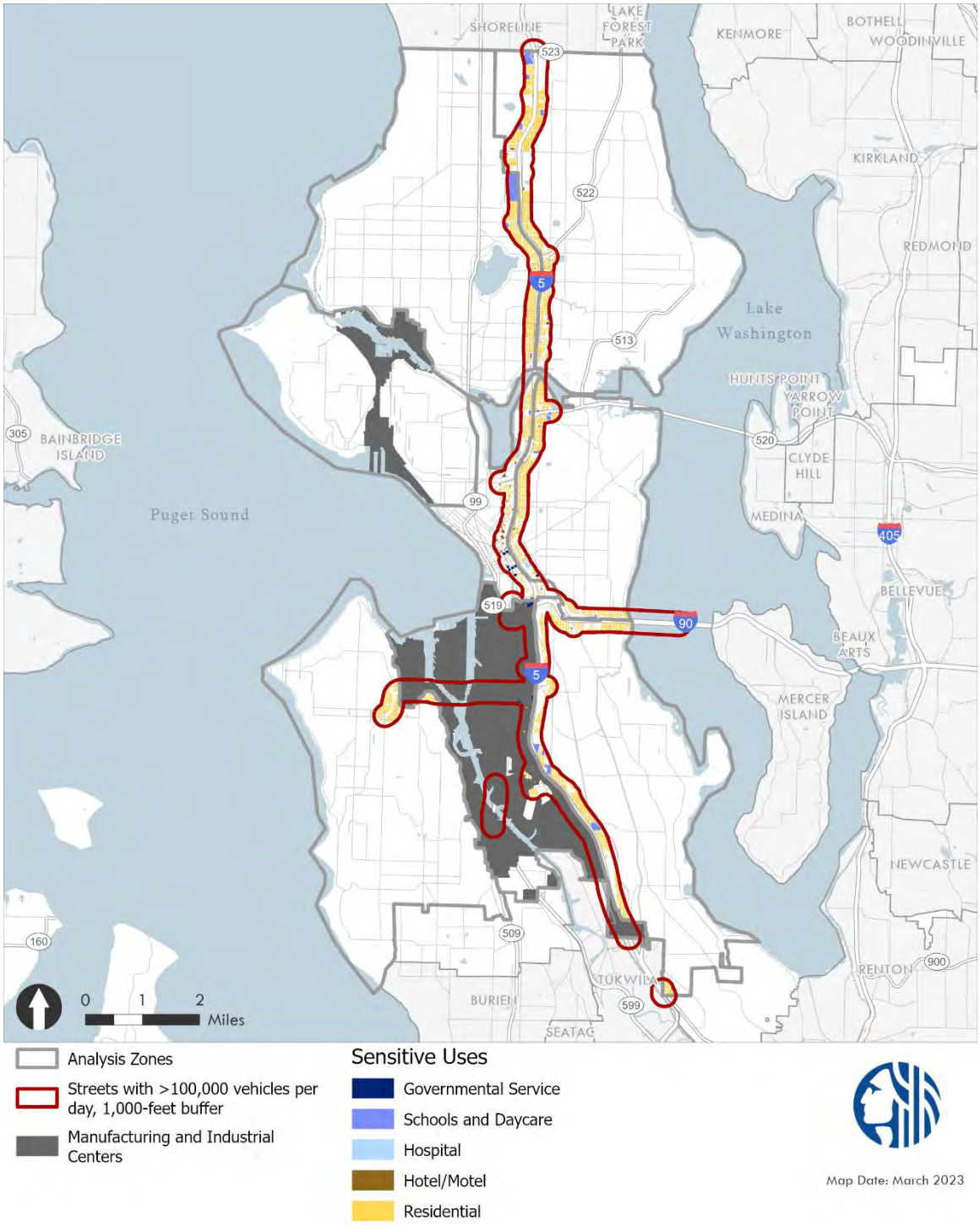
Portions of Seattle are also exposed to relatively high cancer risk values from stationary sources and near port operations where ship emissions and diesel locomotive emissions and diesel forklift emissions can all occur. Similarly, distribution centers that involve relatively high volume of diesel truck traffic can also represent a risk hazard to nearby sensitive land uses. This is considered a moderately adverse impact to air quality. The City has identified measures for receptors proposed in areas proximate to manufacturing industrial centers to reduce the potential risk through the Seattle Industrial and Maritime Lands Final EIS (2022), such as implementing buffer areas of 500 to 1,000 feet and enhanced air filtration systems.

Although, as discussed above, risks and hazards drop dramatically in places farther than 200 meters (656 feet) from the center of highways, a buffer area of 500 to 1,000 feet has been considered to reduce the potential exposure of sensitive populations to air toxics (City of Seattle, 2022). **Exhibit 3.2-6** shows a 1,000-feet buffer around roadways and highways with daily trips greater than 100,000 vehicles. This shows that existing uses along Interstate 5 (I-5) north of Interstate 90 (I-90) consist primarily of residential uses, within 1,000 feet of transportation sources of air pollutants. Under any alternative, increased residential densities could be expected within this buffer. Variations in potential density increases in these areas under each alternative are discussed further below.

This potential increased exposure to cancer risk is considered a potential moderate adverse impact related to air quality.

To address the impact, the City could consider risk-reducing mitigation strategies such as setbacks for residential and other sensitive land uses from major traffic corridors, rail lines, port terminals and similar point sources of particulates from diesel fuel and/or to identify measures for sensitive populations proposed to be in areas near such sources such as upgraded air filtration systems.

Exhibit 3.2-6. 1,000-Feet Buffer Around Freeways and Roadways with Greater than 100,000 Daily Vehicles



Source: Kimly-Horn, 2023.

Impacts of Alternative 1: No Action

Under Alternative 1 future growth would continue based on continuation of the 2035 Comprehensive Plan, with a target housing growth of 80,000 dwelling units. New housing would consist primarily of rental apartments concentrated in existing mixed-use areas. Approximately 46% of housing growth would occur within urban centers and approximately 18% would occur within residential urban villages.

Construction

As discussed above, emissions generated during construction activities would include exhaust emissions from heavy duty construction equipment, trucks used to haul construction materials to and from sites, worker vehicle emissions, as well as fugitive dust emissions associated with earth-disturbing activities, and other demolition and construction work. Emissions associated with future development cannot be determined on a program level as construction activities are project-specific. Therefore, a comparative discussion of construction emissions is based on projected housing units demolished and target housing growth under each of the alternatives. Alternative 1 would result in the least amount of demolished housing units and the lowest ~~target~~ growth compared to all other alternatives. Therefore, emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust would likely be the lowest among all alternatives.

Operations

Transportation-Related Air Quality Emissions

VMT within the City of Seattle would increase as a result of population and employment growth under Alternative 1. Projected changes in VMT were extracted from the projected travel demand model for cars, trucks, and buses. The travel demand model generally assumes existing economic and demographic trends continue with minor changes due primarily to mode share shifts and shortened trips due to increased density. These changes cause projected VMT per capita to decline slightly by 2044. However, total VMT would continue to rise modestly due to population and employment growth.

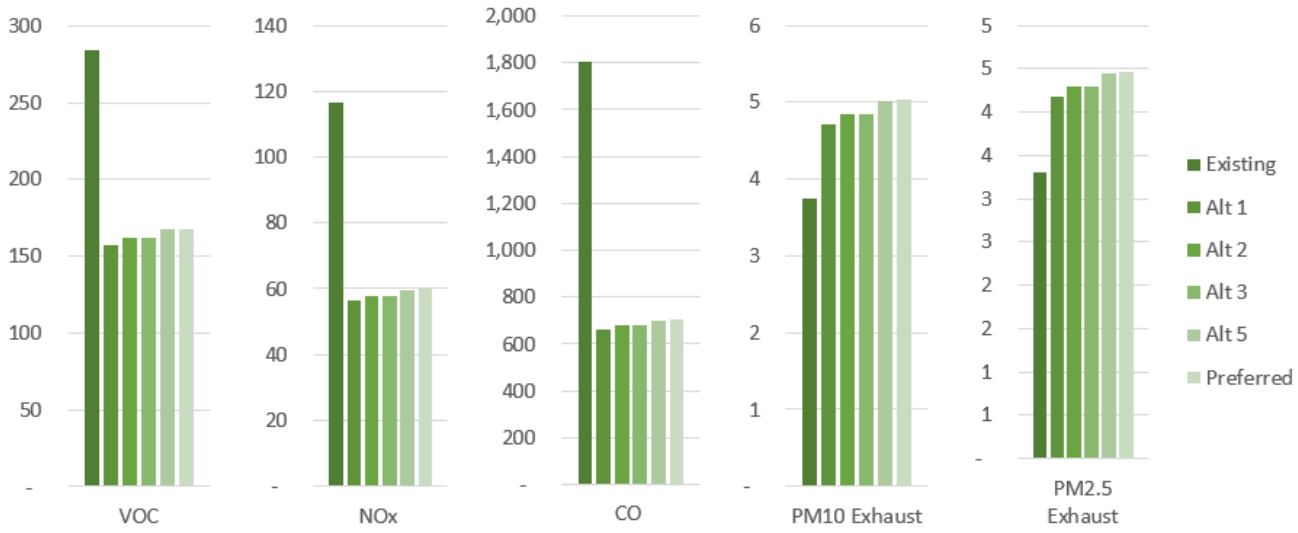
All of the 2044 alternatives are expected to generate lower air pollutant emissions than in 2018, resulting in a net decrease in transportation-related emissions of VOC, CO, and NO_X. This is because the projected improvement in fuel economy outweighs the projected increase in VMT for those criteria pollutants. Transportation-related air pollutant emissions under existing conditions and each of the ~~four~~ alternatives with VMT data are presented in **Exhibit 3.2-7** and **Appendix D**. Note that these emissions are City-wide assuming development under each alternative.

In addition to the tailpipe emissions presented in **Exhibit 3.2-7**, vehicle travel would also generate PM_{10} and $PM_{2.5}$ through tire and brake wear and, more significantly, from entrained

road dust. These non-tailpipe emissions would not benefit from future improvements to the vehicle fleet as a whole or from improvements to fuel composition. Therefore, PM_{10} and $PM_{2.5}$ emissions attributable to fugitive dust is not represented in **Exhibit 3.2-6** (see **Appendix D**).

As can be seen from **Exhibit 3.2-7** regional VOC, CO, and NO_X emissions under Alternative 1 would be substantially lower than under 2018 background conditions. This is because the projected improvement in fuel economy, emission controls and fuel composition will outweigh the projected increase in VMT. Emissions of PM_{10} and $PM_{2.5}$ would be approximately 1 ton/year greater than under existing conditions, which is a nominal increase. This would represent a beneficial future air quality outcome due to significant decreases in VOC, CO, and NO_X emissions. As indicated in **Exhibit 3.2-7**, Alternative 1 would have the lowest criteria pollutant emissions of ~~the five~~ all alternatives.

Exhibit 3.2-7. Road Transportation Pollutant Emissions (pounds per day)



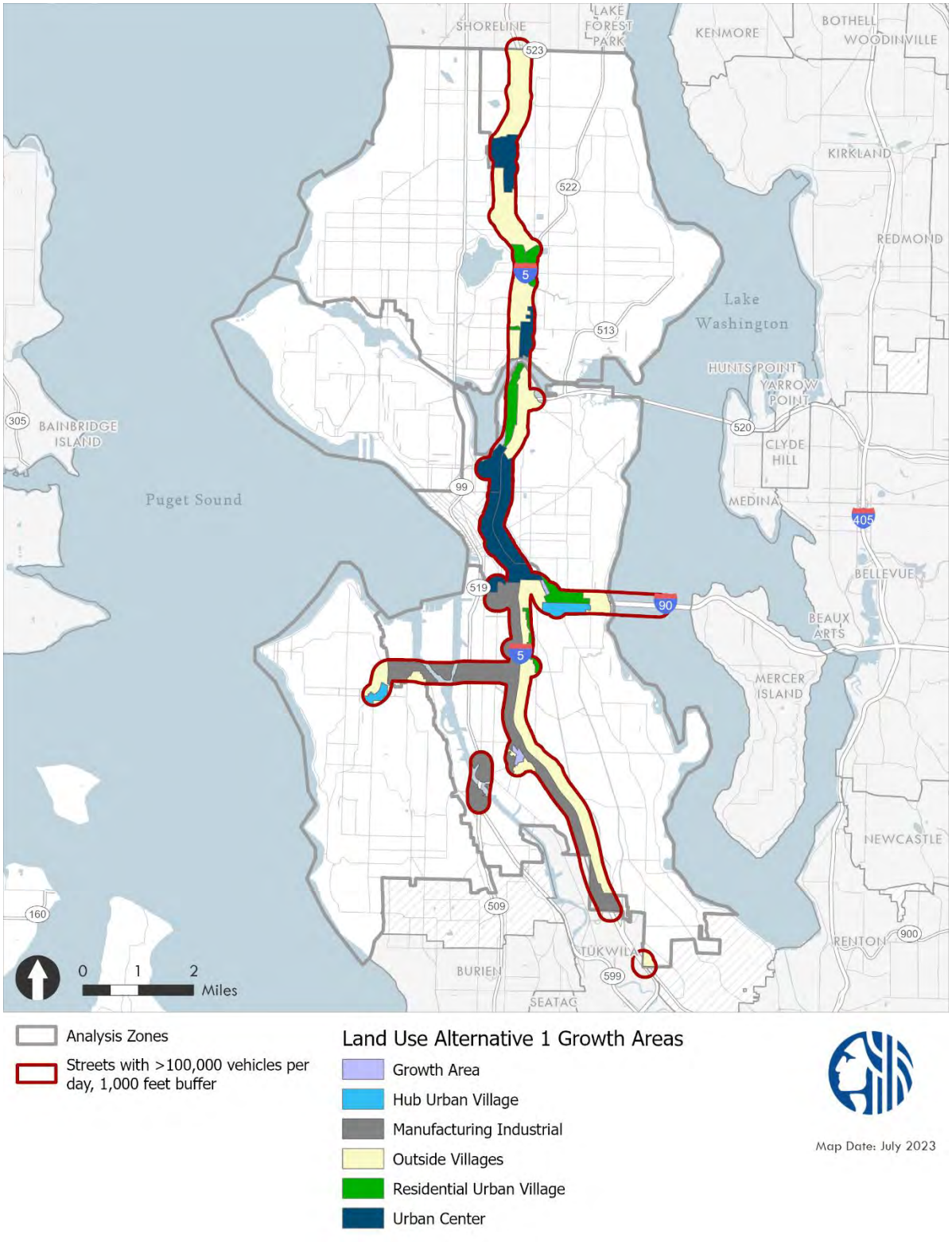
Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no changes were made to Alternatives 1–5.

Source: Kimley-Horn, 2024~~3~~.

Equity & Climate Vulnerability Considerations

As shown in **Exhibit 3.2-8**, several urban centers and urban villages are located within 1,000-feet of roadways with greater than 100,000 daily vehicles. Collectively, these urban centers and villages represent 56% of all projected residential growth in the city through 2044. Only a portion of each center or village is within the 1,000-feet buffer, so the potentially affected portion of the new residents would be smaller. Compared to all other alternatives, the number of units within the affected urban centers and villages would be the lowest (same as Alternative 3 and 4).

Exhibit 3.2-8. 1,000-Feet Buffer Around Freeways and Roadways with Greater than 100,000 Daily Vehicles—Alternative 1



Source: Kimley-Horn, 2023.

Greenhouse Gas Emissions

Changes in operational GHG emissions associated with growth under Alternative 1 would result from increases in VMT and improvements to the vehicle fleet, electrical and natural gas usage, and solid waste generation. GHG emissions from electrical usage are generated when energy consumed is generated by the non-renewable resources of an electrical supplier such as Seattle City Light. However, Seattle City Light is carbon neutral and, consistent with the City's Climate Action Plan, no emissions related to electricity are assumed because City Light will maintain its commitment to carbon neutrality. GHG emissions from natural gas are direct emissions resulting from on-site combustion for heating and other purposes. Solid waste-related emissions are generated when the increased waste generated by development is disposed in a landfill where it decomposes, producing methane gas.[17]

Operational GHG emissions from Alternative 1 are presented in **Exhibit 3.2-9** and **Appendix D**. The transportation emissions reductions from existing emissions due to implementation of Alternative 1 would be the greatest of any of the five alternatives, largely as the result of lower VMT compared to other alternatives which is a reflection of the lowest overall housing growth ~~target~~ and the concentration of that growth within urban centers and urban villages. Reflecting the lowest overall housing growth ~~target~~, the building and waste emissions associated with Alternative 1 would be the lowest of all the alternatives.

Exhibit 3.2-9. Per Capita GHG Emissions—Alternative 1

	Emissions ($MTCO_2e$)
Transportation	-1,662
Buildings	372,474~~48,422~~
Waste	60,834
Total Alternative 1	**431,647**~~107,594~~
Population Growth Estimate	164,000
Per Capita GHG Emissions	**2.63**~~0.66~~

Notes: Population growth calculated using City GIS data for total housing units and population (total units/population = persons per household), assuming 2.05 persons per household
Source: Kimley-Horn, 2024~~3~~.

Per capita GHG emissions due to ~~target~~ growth is calculated by dividing the total GHG emissions by the anticipated population growth. According to the Seattle 2020 Community GHG Inventory, citywide core per capita emissions was 4.09 $MTCO_2e$ per resident in 2020 (City of Seattle, 2020). As shown in **Exhibit 3.2-9**, Alternative 1 would result in per capita emissions of 2.63~~0.66~~ $MTCO_2e$, which is significantly lower than the existing per capita rate.

[17] CH4 from decomposition of municipal solid waste deposited in landfills is counted as an anthropogenic (human-produced) GHG

130th/145th Station Area

Zoning designations under Alternative 1 would be retained within the 130th/145th Station Area and no new areas will be designated for mixed-use or higher density than exists under existing conditions. The future light rail station at 130th would be developed in an area that would allow three-story single-purpose residential development and four- to eight-story multifamily surrounding the future 145th BRT Station. Implementation of Alternative 1 assumes a growth potential of 840 housing units and 716 jobs in proximity to the future light rail and BRT stations.

Construction

Station Area growth under Alternative 1 would be the lowest compared to all other alternatives. Therefore, emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust would likely be the lowest among all alternatives.

Operations

Criteria Pollutant Emissions

Transit has been identified as the most frequent and successful tool in reducing VMT (WSDOT, 2022). Transit improvements overall provide a VMT reduction of up to 2.6% (WSDOT, 2022). Therefore, transit service and connectivity provided by the future light rail and BRT stations in combination with Alternative 1 growth potential, in comparison to baseline conditions, would result in improved transit service and connectivity when compared to existing conditions, providing greater potential for VMT reduction and reductions in criteria pollutants.

Greenhouse Gas Emissions

As stated above, transit service and connectivity provided by the future light rail and BRT stations in combination with Alternative 1 growth potential, in comparison to baseline conditions, would result in improved transit service and connectivity when compared to existing conditions, providing greater potential for VMT reduction and reductions in GHG emissions. In addition, the housing growth potential under Alternative 1 would be the lowest compared to all other alternatives. Therefore, GHG emissions associated with building energy use and solid waste would be lowest under Alternative 1.

Equity & Climate Vulnerability Considerations

The 130th/145th Station Area is located in northern Seattle in Area 2. I-5 transects this area going north-south, and a railway runs through the vicinity of the 130th Street Light Rail Station. ~~Target g~~Growth under Alternative 1 within the Station Area would be lowest among all other alternatives and would place the least number of residents within close proximity to transportation-related pollutants along I-5.

Impacts of Alternative 2: Focused

Under Alternative 2, areas of focused growth called neighborhood centers would create more housing around shops and services, allowing for a wide range of housing types. The target housing growth under this alternative is 100,000 dwelling units. Approximately 37% of housing growth would occur within regional centers and approximately 24% would occur within neighborhood centers.

Construction

Alternative 2 would result in a greater number of demolished housing units compared to Alternative 1 and less than all other ~~A~~alternatives ~~3, 4, and 5~~. Alternative 2 would result in greater ~~target~~ growth compared to Alternative 1, the same as Alternative 3 and 4, and less than Alternative 5 and the Preferred Alternative. Therefore, emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust under Alternative 2 would likely be greater than Alternative 1 and lower than Alternative 3, 4, and 5 and the Preferred Alternative.

Operations

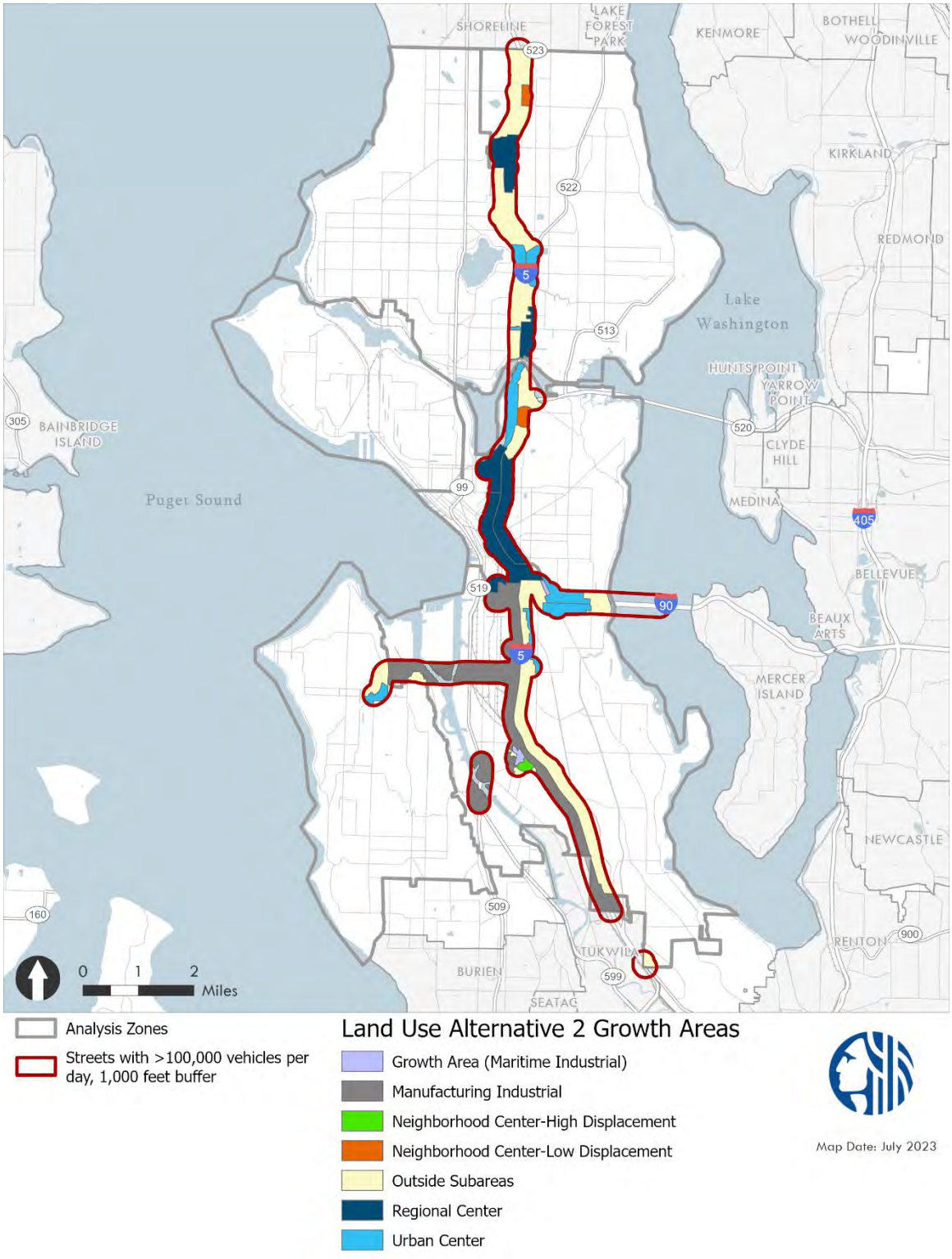
Transportation Air Quality Emissions

Transportation-related air pollutant emissions under existing conditions and each of the four alternatives are presented in **Exhibit 3.2-7** and **Appendix D**. As can be seen from **Exhibit 3.2-7,** regional emissions of VOC, CO, and NO_X under Alternative 2 would be substantially less compared to existing background conditions. This is because the projected improvement in fuel economy, increase in ZEV use, emission controls and fuel composition will outweigh the projected increase in VMT. This would result in a beneficial future air quality outcome. As indicated in **Exhibit 3.2-7**, transportation emissions from Alternative 2 would be slightly higher than those from Alternative 1, mostly because reductions in transportation emissions (from existing background conditions) realized from implementation of Alternative 2 would be slightly less than those of Alternative 1.

Equity & Climate Vulnerability Considerations

In addition to the regional centers and villages that would be within the 1,000-feet buffer under Alternative 1, Alternative 2 would place additional neighborhood centers units within the buffer, as shown in **Exhibit 3.2-10**. Included in the additional units is the 130th/145th Station Area. Although a greater number of units would be closer to transportation sources of pollution and thus at higher risk than under Alternative 1, overall units within these regional centers, urban center, and neighborhood centers consists of 46% of overall projected growth, which is higher than that of Alternative 1. Only a portion of each center is within the 1,000-feet buffer, so the potentially affected portion of the new residents would be smaller. Alternative 2 would place a greater number of units within the 1,000-foot buffer when compared to Alternative 1, 3, and 4, but fewer units compared to Alternative 5 and the Preferred Alternative.

Exhibit 3.2-10. 1,000-Feet Buffer Around Freeways and Roadways with Greater than 100,000 Daily Vehicles—Alternative 2



Source: Kimley-Horn, 2023.

Greenhouse Gas Emissions

GHG emissions under development of Alternative 2 were calculated using the same methodologies as those described for Alternative 1 but reflect the increases in target housing growth in neighborhood centers throughout the city. Operational GHG emissions from Alternative 2 are presented in **Exhibit 3.2-11** and **Appendix D**. Alternative 2 would result in less reductions in transportation GHG emissions compared to Alternative 1, largely as the result of greater VMT which is a reflection of the greater housing growth ~~target~~. However, under Alternative 2, the additional growth is focused in neighborhood centers, including transit-oriented developments that would potentially decrease trip lengths. Therefore, as shown in **Exhibit 3.2-11**, the per capita GHG emissions associated with Alternative 2 growth ~~targets~~ would be 2.20~~0.55~~ $MTCO_2e$, lower than the per capita emissions under Alternative 1. Emissions related to building energy and solid waste would be greater than Alternative 1. Although target housing and employment growth would be the same under Alternative 2, 3, and 4, building and waste emissions would be lower for Alternative 2 due to variations in housing type mix and associated emissions factors.

Exhibit 3.2-11. Per Capita GHG Emissions—Alternative 2

	Emissions ($MTCO_2e$)
Transportation	-834
Buildings	388,378~~50,489~~
Waste	64,053
Total Alternative 2	**451,597**~~113,708~~
Population Growth Estimate	205,000
Per Capita GHG Emissions	**2.20**~~0.55~~

Notes: Population growth calculated using City GIS data for total housing units and population (total units/population = persons per household), assuming 2.05 persons per household
Source: Kimley-Horn, 2024~~3~~.

130th/145th Station Area

Under Alternative 2, changes in land use designations focus on addressing transit-oriented developments, designating the station areas as neighborhood centers. Growth would be clustered in small mixed-use nodes near transit, resulting in denser and taller buildings with heights of up to 80 feet. Implementation of Alternative 2 assumes a growth potential of 2,208 housing units, which is greater than the growth potential with Alternative 1.

Construction

Station Area growth under Alternative 2 would be higher than Alternative 1 and lower than Alternative 5 and the Preferred Alternative. Emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust would likely be greater than Alternative 1 and less than Alternative 5 and the Preferred Alternative based on the ~~target~~ growth in dwelling units.

Operations

Criteria Pollutant Emissions

Increased growth potential within neighborhood centers combined with improvements to transit service and connectivity, when compared with Alternative 1, would result in greater potential for VMT reduction and reductions in criteria pollutant emissions.

Greenhouse Gas Emissions

As stated above, increased growth potential within neighborhood centers combined with improvements to transit service and connectivity, when compared with Alternative 1, would result in greater potential for VMT reduction, resulting in reductions in GHG emissions. However, ~~target~~ growth within the Station Area under Alternative 2 would be greater than Alternative 1, resulting in higher emissions related to building energy consumption and solid waste generation.

Equity & Climate Vulnerability Considerations

The 130th/145th Station Area is located in northern Seattle in Area 2. I-5 transects this area going north-south, and a railway runs through the vicinity of the 130th Street Light Rail Station. ~~Target g~~Growth under Alternative 2 within the Station Area would be greater than Alternative 1 and would place a greater number of residents within close proximity to transportation-related pollutants along I-5. Compared to Alternative 5 and the Preferred Alternative, Alternative 2 would place a fewer number of residents within close proximity to transportation-related pollutants along I-5.

Impacts of Alternative 3: Broad

Under Alternative 3, a wider range of low-scale housing options in urban neighborhood areas would be allowed, expanding housing choices and allowing housing options near existing parks and other amenities. The target housing growth under this alternative is 100,000 dwelling units. Approximately 37% of housing growth would occur within regional center and approximately 22% would occur within urban neighborhood areas.

Construction

Alternative 3 would result in the greatest number of demolished units when compared to all other alternatives except for the Preferred Alternative. Alternative 3 would result in greater ~~target~~ growth compared to Alternative 1, the same as Alternative 2 and 4, and less than Alternative 5 and the Preferred Alternative. Although Alternative 3 would result in 763 greater demolished units than Alternative 5, ~~target~~ growth for Alternative 3 includes 20,000 fewer units. Therefore, emissions associated with heavy-duty construction equipment, trucks, worker

vehicles, and fugitive dust would likely be greater than Alternative 1, 2, and 4 and lower than Alternative 5 and the Preferred Alternative.

Operations

Transportation Air Quality Emissions

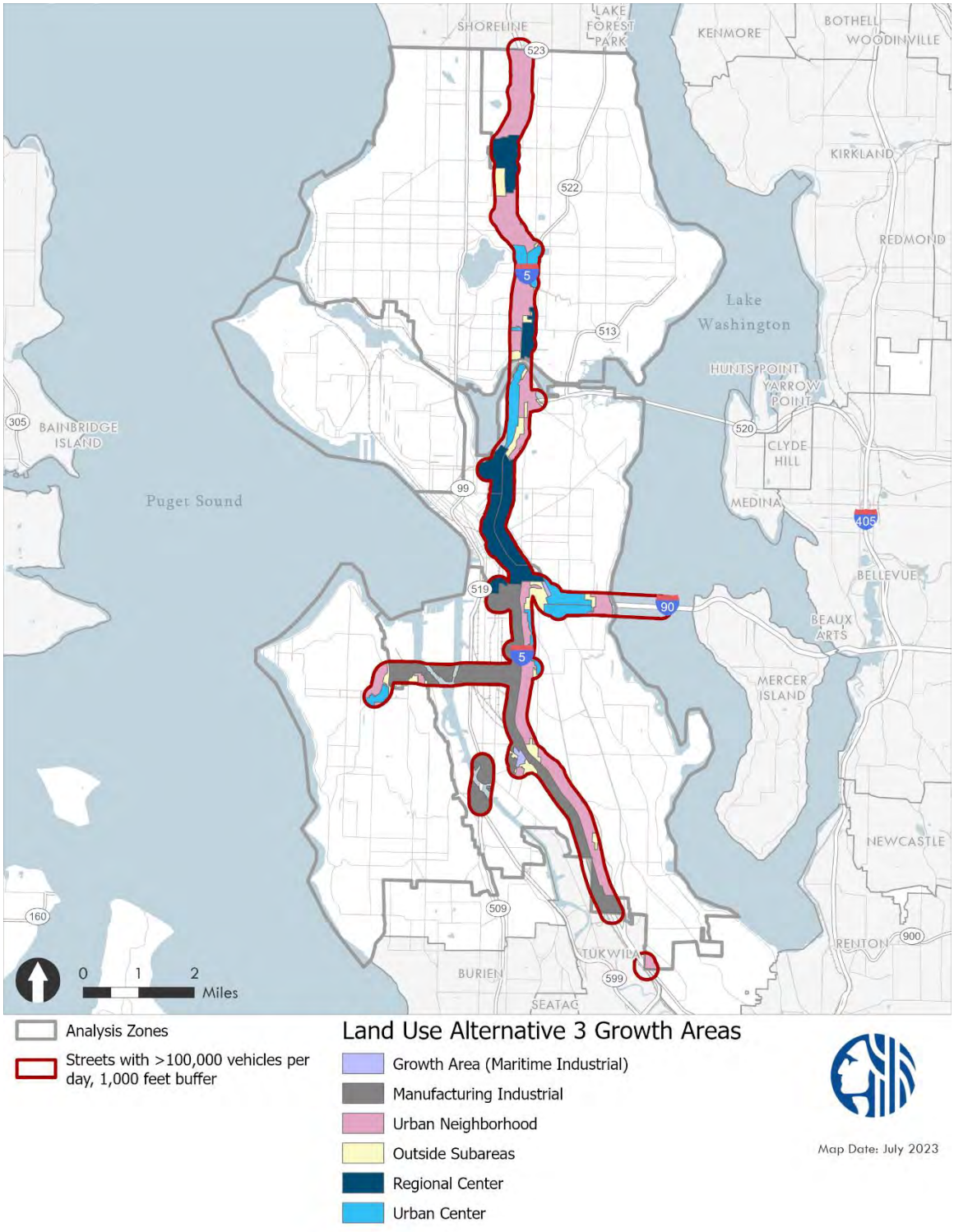
Transportation-related air pollutant emissions under existing conditions and each of the alternatives with VMT data are presented in **Exhibit 3.2-7** and **Appendix D**.

As can be seen from **Exhibit 3.2-7,** regional emissions of VOC, CO, and NO_X under Alternative 3 would be substantially less than under existing background conditions. This is because the projected improvement in fuel economy, increase in ZEV use, emission controls and fuel composition will outweigh the projected increase in VMT. This would result in a beneficial future air quality outcome. As indicated in **Exhibit 3.2-7**, transportation emissions from Alternative 3 would be slightly higher than those from Alternative 2, mostly because reductions in transportation emissions (from existing background conditions) realized from implementation of Alternative 3 would be the same as those of Alternative 2 but less than those of Alternative 1.

Equity & Climate Vulnerability Considerations

As shown in **Exhibit 3.2-12**, the regional centers and villages within the 1,000-feet buffer under Alternative 3 would be the same as Alternative 1, collectively representing 56% of all projected residential growth in the city through 2044. Only a portion of each center or village is within the 1,000-feet buffer, so the potentially affected portion of the new residents would be smaller. A greater proportion of city-wide growth would be located in close proximity to transportation-related emissions when compared to Alternative 2. Alternative 3 would place the fewest number of units (the same as Alternative 1 and 4) within the 1,000-foot buffer when compared to Alternatives 2 and 5 and the Preferred Alternative.

Exhibit 3.2-12. 1,000-Feet Buffer Around Freeways and Roadways with Greater than 100,000 Daily Vehicles—Alternative 3



Source: Kimley-Horn, 2023.

Greenhouse Gas Emissions

GHG emissions under development of Alternative 3 were calculated using the same methodologies as those described for Alternative 1 but reflect the increases in target housing growth in urban neighborhoods throughout the city. Operational GHG emissions from Alternative 3 are presented in **Exhibit 3.2-13** and **Appendix D**. Alternative 3 would result in fewer reductions in transportation emissions compared to Alternative 1 and similar to those of Alternative 2 and 4. Emissions related to building energy and waste would be greater than Alternatives 1, 2, and 4 and less than Alternative 5 and the Preferred Alternative. Per capita emissions of 2.220.56 $MTCO_2e$, as shown in **Exhibit 3.2-13**, are the same as Alternative 4, greater than Alternative 2 and 5, and less than Alternative 1.

Exhibit 3.2-13. Per Capita GHG Emissions—Alternative 3

	Emissions ($MTCO_2e$)
Transportation	-835
Buildings	391,73650,926
Waste	64,294
Total Alternative 3	**455,196114,385**
Population Growth Target	205,000
Per Capita GHG Emissions	**2.220.56**

Notes: Population growth calculated using City GIS data for total housing units and population (total units/population = persons per household), assuming 2.05 persons per household
Source: Kimley-Horn, 20243.

130th/145th Station Area

The station area plan would not be implemented under Alternative 3; it would grow based on the applicable citywide place types.

Impacts of Alternative 4: Corridor

Alternative 4 would accommodate a wider range of housing options only in corridors to focus growth near transit and amenities. The target housing growth under this alternative is 100,000 dwelling units. Approximately 37% of housing growth would occur within regional centers and approximately 21% would occur within corridors.

Construction

Alternative 4 would result in the demolition of a greater number of housing units than Alternative 1 and 2 and less than Alternatives 3 and 5 and the Preferred Alternative. Alternative 4 would result in greater target growth compared to Alternative 1, the same as Alternative 2

and 3, and less than Alternative 5 and the Preferred Alternative. Therefore, emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust would likely be greater than Alternative 1 and 2 and lower than Alternatives 3 and 5 and the Preferred Alternative.

Operations

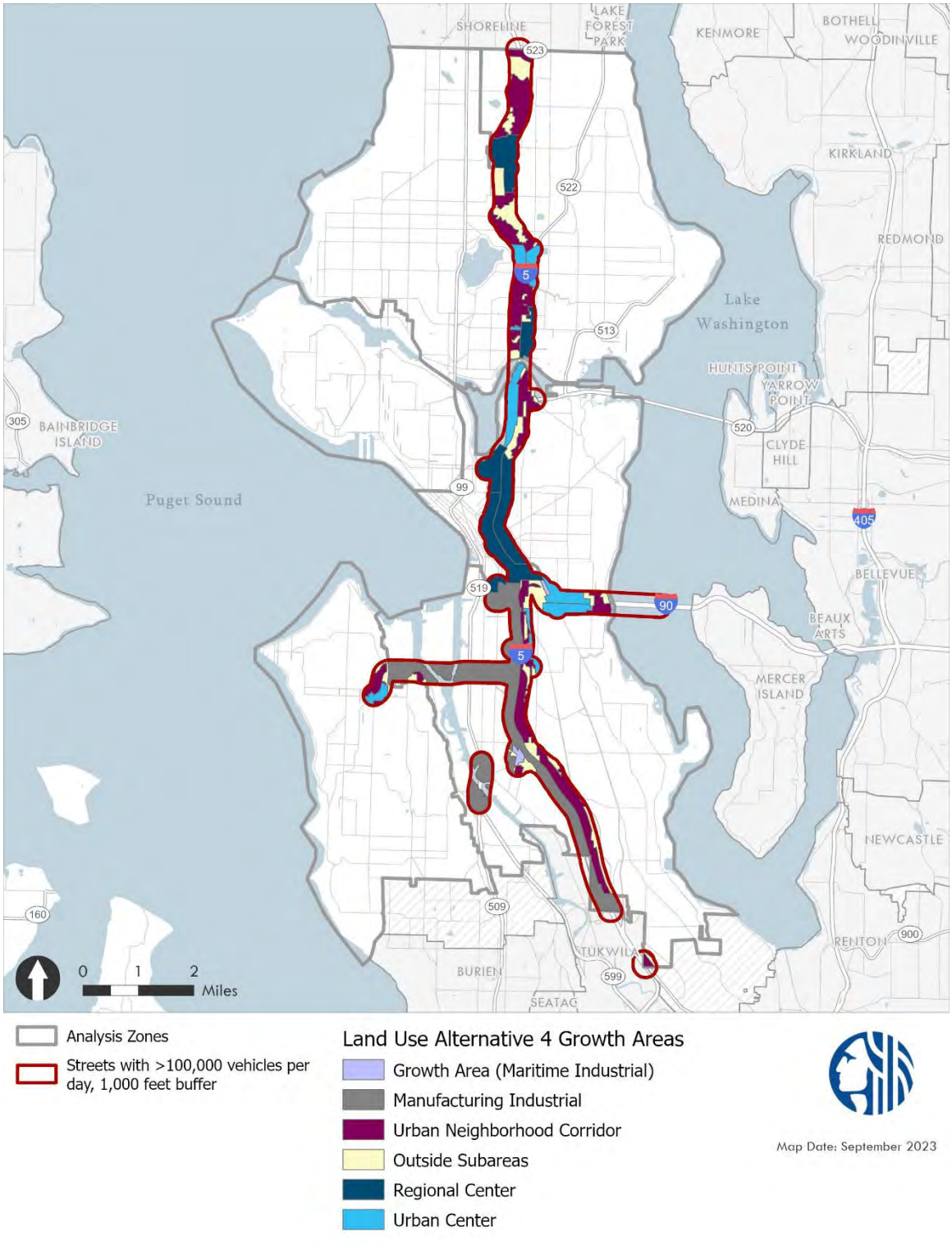
Transportation Air Quality Emissions

Transportation-related air pollutant emissions under existing conditions and each of the ~~four~~ alternatives with VMT data are presented in **Exhibit 3.2-7** and **Appendix D**. The housing growth ~~target~~ under Alternative 4 would be the same as Alternative 2 and Alternative 3 and the geographical distribution of that housing growth under Alternative 4 would be to similar areas of the city as Alternative 3 as well. Therefore, VMT data has not been modeled for Alternative 4 and it is assumed that regional pollutant emissions under Alternative 4 would be the same as Alternative 3, which would be substantially less than under existing background conditions, greater than Alternative 1, and less than Alternative 5 and the Preferred Alternative.

Equity & Climate Vulnerability Considerations

As shown in **Exhibit 3.2-14**, the regional centers and villages within the 1,000-feet buffer under Alternative 4 would be the same as Alternative 1 and Alternative 3, collectively representing 56% of all projected residential growth in the city through 2044. Only a portion of each center or village is within the 1,000-feet buffer, so the potentially affected portion of the new residents would be smaller. A greater proportion of city-wide growth would be located in close proximity to transportation-related emissions when compared to Alternative 2. Alternative 4 would place the fewest number of units (the same as Alternative 1 and 3) within the 1,000-foot buffer when compared to Alternatives 2 and 5 and the Preferred Alternative.

Exhibit 3.2-14. 1,000-Feet Buffer Around Freeways and Roadways with Greater than 100,000 Daily Vehicles—Alternative 4



Source: Kimley-Horn, 2023.

Greenhouse Gas Emissions

GHG emissions under development of Alternative 4 were calculated using the same methodologies as those described for Alternative 1 but reflect the land use differences of increased density of residential development in the corridors throughout the city. Operational GHG emissions from Alternative 4 are presented in **Exhibit 3.2-15** and **Appendix D**. The transportation emissions reductions realized from implementation of Alternative 4 would be similar to those of Alternative 2 and Alternative 3. Emissions related to building energy and solid waste would be greater than Alternative 1 and 2 and less than Alternatives 3 and 5 and the Preferred Alternative. Per capita emissions of 2.21~~0.56~~ $MTCO_2e$ (as shown in **Exhibit 3.2-15**) are the same as Alternative 3, higher than Alternative 2 and 5, and lower than Alternative 1.

Exhibit 3.2-15. Per Capita GHG Emissions—Alternative 4

	Emissions ($MTCO_2e$)
Transportation	-835
Buildings	389,644~~50,654~~
Waste	64,294
Total Alternative 4	**453,104**~~114,113~~
Population Growth Estimate	205,000
Per Capita GHG Emissions	**2.21**~~0.56~~

Notes: Population growth calculated using City GIS data for total housing units and population (total units/population = persons per household), assuming 2.05 persons per household
Source: Kimley-Horn, 2024~~3~~.

130th/145th Station Area

The station area plan would not be implemented under Alternative 4; it would grow based on the applicable citywide place types.

Impacts of Alternative 5: Combined

Alternative 5 anticipates the largest increase in supply and diversity of housing units within the city. In addition to the growth strategies of Alternatives 2, 3, and 4, Alternative 5 would promote a greater range of rental and ownership housing and address past underproduction of housing and rising housing costs. The target housing growth under this alternative is 120,000 dwelling units. While most housing would continue to be in regional centers (36% of housing growth) and urban centers (19% of housing growth), the combined growth in neighborhood centers and corridors would be substantial (24%).

Construction

Alternative 5 would result in a greater number of demolished units than Alternative 1, 2, and 4 and less than Alternative 3 and the Preferred Alternative. Alternative 5 and the Preferred Alternative would result in the greatest ~~target~~ growth compared to all other alternatives. Therefore, emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust would likely be ~~the~~ greatest~~est~~er ~~out of all give a~~ than Alternatives 1, 2, 3, and 4 but lower than the Preferred Alternative.

Operations

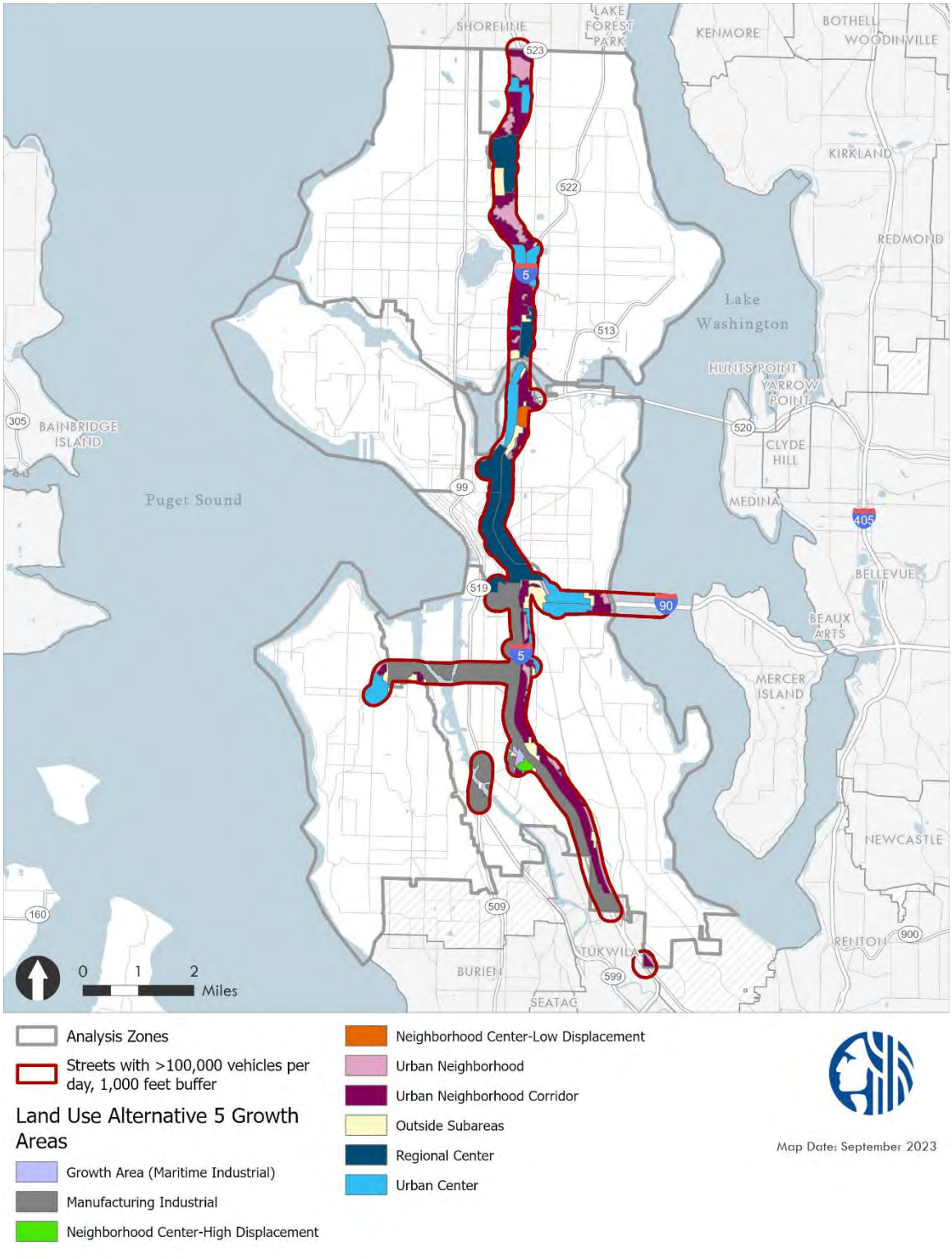
Transportation Air Quality Emissions

Transportation-related air pollutant emissions under existing conditions and each of the four alternatives with VMT data are presented in **Exhibit 3.2-7** and **Appendix D**. As can be seen from **Exhibit 3.2-7**, emissions of VOC, CO, and NO_X under Alternative 5 would be substantially less than under existing background conditions. This is because the projected improvement in fuel economy, increase in ZEV use, emission controls and fuel composition will outweigh the projected increase in VMT. This would result in a beneficial future air quality outcome. As indicated in **Exhibit 3.2-7**, transportation emissions from Alternative 5 would be higher than those from all other alternatives, mostly because Alternative 5 has the highest housing and jobs targets, resulting in the highest VMT, compared to all other alternatives.

Equity & Climate Vulnerability Considerations

This alternative would place the emphasis for growth near transit centers, with the 130th Street station designated as an urban center. In addition, additional neighborhood center units would be located in close proximity to transportation-related emissions as shown in **Exhibit 3.2-16**. Consistent across all alternatives, the highest amount of projected growth would be within the Downtown Regional Center and First Hill/Capitol Hill Regional Center. Alternative 5 has the highest housing growth ~~target~~ among the five alternatives. As a result, the proportion of city-wide growth that would be located in close proximity to transportation-related emissions is the lowest (39%) under this alternative while the total amount of collective growth would be the greatest. Only a portion of each center or village is within the 1,000-feet buffer, so the potentially affected portion of the new residents would be smaller. Alternative 5 would place a~~the~~ greater~~est~~ number of units within the 1,000-foot buffer when compared to ~~the other a~~Alternatives 1 through 4 and would place fewer units within the 1,000-foot buffer when compared to the Preferred Alternative.

Exhibit 3.2-16. 1,000-Feet Buffer Around Freeways and Roadways with Greater than 100,000 Daily Vehicles—Alternative 5



Source: Kimley-Horn, 2023.

Greenhouse Gas Emissions

GHG emissions under development of Alternative 5 were calculated using the same methodologies as those described for Alternative 1 but reflect the land use differences of increased density of residential development in the regional centers, urban centers, neighborhood centers, and urban neighborhood areas. Operational GHG emissions from Alternative 5 are presented in **Exhibit 3.2-17** and **Appendix D**. Transportation emissions from ~~target~~ growth associated with Alternative 5 would be the greatest out of all five alternatives and would result in increases in transportation emissions in comparison with existing conditions. However, due to increased density of residential development, the Alternative results in a reduction in per capita VMT. Alternative 5 results in per capita GHG emissions of 1.93~~0.49~~ $MTCO_2e$, see **Exhibit 3.2-17**. Therefore, while Alternative 5 results in the same ~~highest~~ (and highest) overall housing growth as the Preferred Alternative ~~and VMT~~, Alternative 5 would result in lower VMT (resulting in lower transportation-related emissions), ~~resulting in the highest GHG emissions associated with transportation,~~ building energy, and waste compared to the Preferred Alternative and ~~the other alternatives,~~ per capita emissions would be the lowest.

Exhibit 3.2-17. Per Capita GHG Emissions—Alternative 5

	Emissions ($MTCO_2e$)
Transportation	176
Buildings	406,041~~52,785~~
Waste	67,917
Total Alternative 5	**474,134**~~120,878~~
Population Growth Estimate	246,000
Per Capita GHG Emissions	**1.93**~~0.49~~

Notes: Population growth calculated using City GIS data for total housing units and population (total units/population = persons per household), assuming 2.05 persons per household
Source: Kimley-Horn, 2024~~3~~.

130th/145th Station Area

Under Alternative 5, an urban center designation on both the west and east sides of the 130th Station Area would merge with an existing commercial node to expand residential mixed use near the station. Growth would be accommodated in more mixed-use buildings, providing greater housing types in buildings with heights of up to 95 feet. Implementation of Alternative 5 assumes a growth potential of 2,703 housing units, which is greater than all other alternatives.

Construction

Station Area growth under Alternative 5 would be the greatest compared to all other alternatives. Therefore, emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust would likely be the highest among all alternatives.

Operations

Criteria Pollutant Emissions

Increased growth potential within urban centers combined with improvements to transit service and connectivity provided by the stations associated with Alternative 5, when compared with all the other alternatives, would result in greatest potential for per capita VMT reduction and reductions in criteria pollutant emissions.

Greenhouse Gas Emissions

As stated above, Station Area growth under Alternative 5 would result in the greatest potential for VMT reduction and reductions in transportation-related GHG emissions. However, Station Area growth would be the highest under Alternative 5, likely resulting in the highest emissions related to building energy consumption and solid waste generation.

Equity & Climate Vulnerability Considerations

The 130th/145th Station Area is located in northern Seattle in Area 2. I-5 transects this area going north-south, and a railway runs through the vicinity of the 130th Street Light Rail Station. ~~Target g~~Growth under Alternative 5 within the Station Area would be the greatest compared to all other alternatives and would potentially place the greatest number of residents within close proximity to transportation-related pollutants along I-5.

Impacts of Preferred Alternative

Note: The impacts analysis for the Preferred Alternative was added since the Draft EIS.

The Preferred Alternative anticipates an increase in supply and diversity of housing across Seattle similar to Alternative 5. It includes the strategies for encouraging housing growth in the other action alternatives plus some additional changes to existing center boundaries and changes to place type designations beyond Alternative 5 (see **Exhibit 2.4-28**). Like Alternative 5, the Preferred Alternative anticipates the largest increase in supply of housing units within the City. As with Alternative 5, the target housing growth under this alternative is 120,000 dwelling units.

Construction

The Preferred Alternative would result in a greater number of demolished units than any other Alternative. The Preferred Alternative would result in the greatest growth compared to any other alternative except for Alternative 5, which would have the same growth. Therefore, emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust would likely be the same or greater than the other alternatives.

Operations

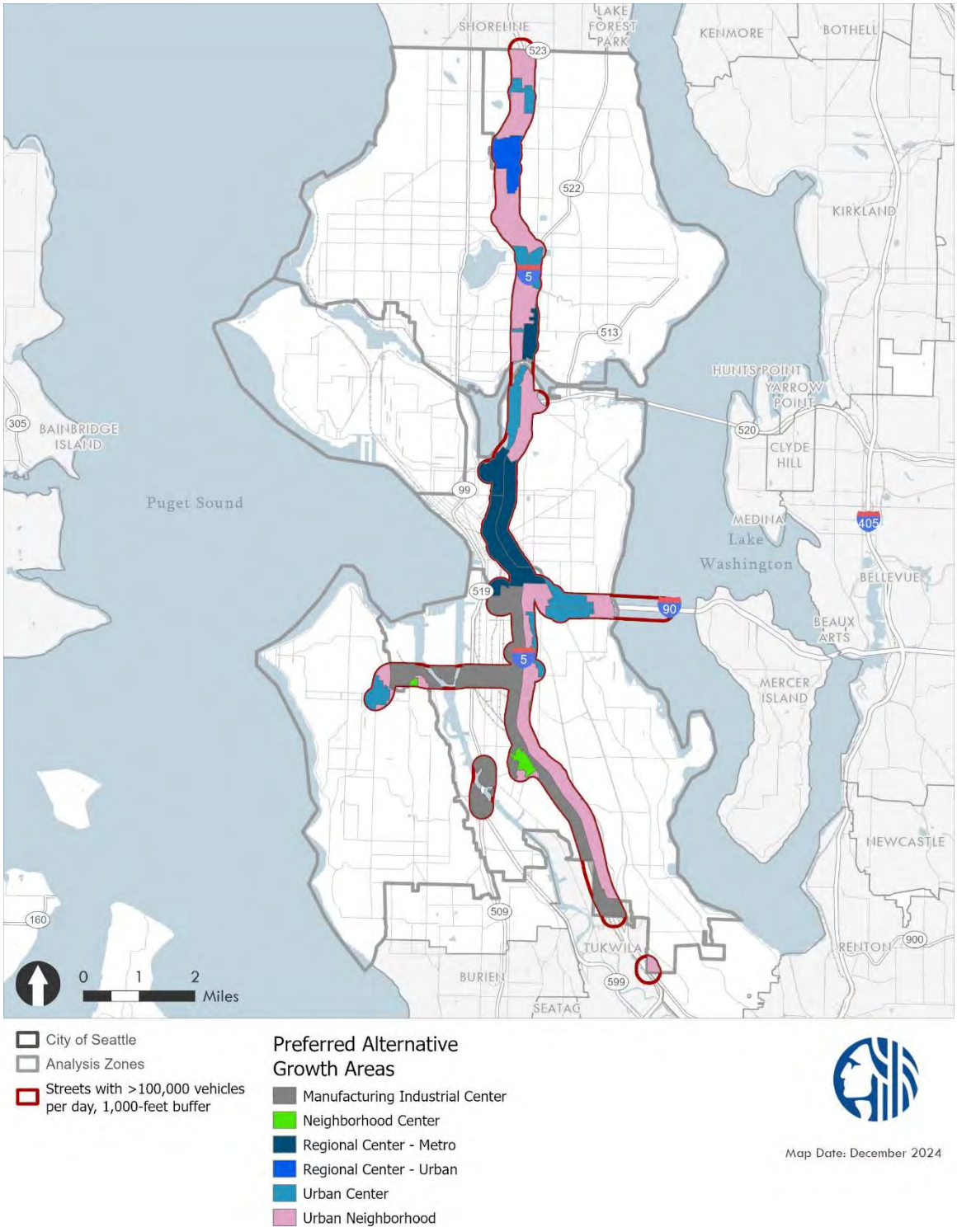
Transportation Air Quality Emissions

Transportation-related air pollutant emissions under existing conditions and each of the alternatives with VMT data are presented in **Exhibit 3.2-7** and **Appendix D**. Growth 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; this is due to the similar growth as Alternative 5 but an associated evaluation of transportation improvements in the Transportation Element. Preferred Alternative emissions have been estimated by increasing Alternative 5 emissions by 0.38%. As can be seen from **Exhibit 3.2-7**, emissions of VOC, CO, and NO_X under the Preferred Alternative would be substantially less than under existing conditions. This is because the projected improvement in fuel economy, increase in ZEV use, emission controls and fuel composition will outweigh the projected increase in VMT. This would result in a beneficial future air quality outcome. As indicated in **Exhibit 3.2-7**, transportation emissions from the Preferred Alternative, like Alternative 5, would be higher than those from any other alternative, mostly because the Preferred Alternative and Alternative 5 have the highest housing and jobs targets, resulting in the highest VMT, compared to all other alternatives.

Equity & Climate Vulnerability Considerations

This alternative would place the emphasis for growth near transit centers, with the 130th Street station designated as an urban center. In addition, additional neighborhood center dwelling units would be located in close proximity to transportation-related emissions as shown in **Exhibit 3.2-18**. Consistent across all alternatives, the highest amount of projected growth would be within the Downtown Regional Center and First Hill/Capitol Hill Regional Center. The Preferred Alternative and Alternative 5 have the highest housing growth among the alternatives. As a result, the proportion of city-wide growth that would be located in close proximity to transportation-related emissions (40%) is lower than all alternatives except for Alternative 5 (39%). Only a portion of each center or village is within the 1,000-feet buffer, so the potentially affected portion of the new residents would be smaller than 40%. The Preferred Alternative would place the greatest number of units within the 1,000-foot buffer as compared to the other alternatives.

Exhibit 3.2-18. 1,000-Feet Buffer Around Freeways and Roadways with Greater than 100,000 Daily Vehicles—Preferred Alternative



Source: Kimley-Horn, 2024.

Greenhouse Gas Emissions

GHG emissions resulting from development of the Preferred Alternative were calculated using the same methodologies as those described for Alternative 5 but reflect the differences in housing unit types. Operational GHG emissions from the Preferred Alternative are presented in **Exhibit 3.2-19**Exhibit 3.2-17 and **Appendix D**. Growth under Alternative 5 and the Preferred Alternative would be the same. The difference in the allocation of growth and evaluation of transportation improvements in the Transportation Element 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%. Transportation emissions from growth associated with the Preferred Alternative would be the greatest out of all alternatives and would result in increases in transportation emissions in comparison with existing conditions. Due to increased density of residential development compared to existing conditions, the Preferred Alternative results in a reduction in per capita VMT. The Preferred Alternative results in per capita GHG emissions of 1.97 $MTCO_2e$, see **Exhibit 3.2-19**. While the Preferred Alternative results in the same (and highest) overall housing growth as Alternative 5, the Preferred Alternative would result in greater transportation-related emissions due to the allocation and distribution of growth (resulting in higher VMT) and greater emissions associated with building energy and waste due to differing growth by housing types compared to Alternative 5. As such, per capita emissions under the Preferred Alternative would be slightly higher than Alternative 5 and lower than Alternatives 1 through 4.

Exhibit 3.2-19. Per Capita GHG Emissions—Preferred Alternative

	Emissions ($MTCO_2e$)
Transportation	294
Buildings	415,152
Waste	69,683
Total Preferred Alternative	**485,128**
Population Growth Estimate	246,000
Per Capita GHG Emissions	**1.97**

Notes: Population growth calculated using City GIS data for total housing units and population (total units / population = persons per household), assuming 2.05 persons per household.
Source: Kimley-Horn, 2024.

130th/145th Station Area

Under the Preferred Alternative, similar to Alternative 5, an urban center designation on both the west and east sides of the 130th Station Area would merge with an existing commercial node to expand residential mixed use near the station. Growth would be accommodated in more mixed-use buildings, providing greater housing types in buildings with heights of up to 85

feet. Implementation of the Preferred Alternative assumes a growth potential of 2,152 housing units, which is similar to Alternative 2.

Construction

Station Area growth under the Preferred Alternative would be similar to Alternative 2. Therefore, emissions associated with heavy-duty construction equipment, trucks, worker vehicles, and fugitive dust would be similar to Alternative 2.

Operations

Criteria Pollutant Emissions

Increased growth potential within urban centers combined with improvements to transit service and connectivity provided by the stations associated with the Preferred Alternative would result in greater potential for per capita VMT reduction. Reductions in criteria pollutant emissions under the Preferred Alternative, similar to Alternative 5, would be the greatest when compared with Alternatives 1 through 4.

Greenhouse Gas Emissions

As stated above, Station Area growth under the Preferred Alternative, would result in greater potential for VMT reduction and reductions in transportation-related GHG emissions. In addition, Station Area growth would be similar to Alternative 2, likely resulting in similar emissions related to building energy consumption and solid waste generation (lower than Alternative 5).

Equity & Climate Vulnerability Considerations

The 130th/145th Station Area is located in northern Seattle in Area 2. I-5 transects this area going north-south, and a railway runs through the vicinity of the 130th Street Light Rail Station. Growth under the Preferred Alternative within the Station Area would be similar to Alternative 2 and would potentially place a similar number of residents within close proximity to transportation-related pollutants along I-5 (less than Alternative 5).

3.2.3 Mitigation Measures

Incorporated Plan Features

Under the action alternatives, the City will update its Comprehensive Plan policies for land use, transportation, and others with an opportunity to increase residential compatibility in proximity to major air emission sources.

Regulations & Commitments

Air Quality

Several federal, state, and regional regulations or efforts apply to construction and allowed land uses:

- NAAQS: As described above, the EPA established NAAQS and specifies future dates for states to develop and implement plans to achieve these standards.
- Washington State: Ecology established state ambient air quality standards for the same size pollutants (CO, VOCs, NO_2, PM, SO_2, and ozone) that are at least as stringent as the national standards.
- PSCAA Regulations: All construction sites in the Puget Sound region are required to implement emission controls to minimize fugitive dust and odors during construction, as required by PSCAA Regulation 1, Section 9.15, Fugitive Dust Control Measures.

  PSCAA manages permitting of stationary air pollutant sources and all industrial and commercial air pollutant sources in the Puget Sound region are required to register with the PSCAA.

Greenhouse Gases & Climate Change

- Washington State Clean Buildings Performance Standard (CBPS): The legislature passed clean building laws in 2019 (HB 1257) and 2022 (SB 5722) to create an energy performance standard for non-residential buildings larger than 50,000 square feet and require energy management planning, operations and maintenance and tracking energy use over time for non-residential buildings larger than 20,000 square feet and multifamily buildings over 50,000 square feet.
- ~~Washington State~~ Energy Code**s**: Development in the study area would be subject to the applicable requirements of the Washington State Energy Code and the Seattle Energy Code, which regulate~~s~~ the energy-use features of new and remodeled buildings.
- The City's 2013 CAP and the 2018 Climate Strategy include strategies and actions to limit atmospheric warming to 1.5 degrees Celsius. The strategies and actions focus on road transportation and building energy, which comprise the majority of local emissions, and which are the dominant sources of GHG emissions in the City.
- All buildings with 50,000 square feet or more of nonresidential space (excluding parking) must comply with the Building Tune-Ups requirement every five years (Seattle Municipal Code 22.930). Building Tune-Ups involve assessment and implementation of operational and maintenance improvements to achieve energy (and water) efficiency, which helps to reduce GHG emissions.
- ~~The City of Seattle Building Energy Code eliminates the use of fossil fuels like gas and electric resistance from most water heating and space heating systems in new construction and substantial alterations for commercial and multifamily uses.~~
- Seattle's Energy Benchmarking Law (Seattle Municipal Code 22.290) requires the owners of non-residential and multifamily buildings (20,000 square feet or larger) to track and report (annually) energy performance.

- Seattle's Transportation Electrification Blueprint includes initial steps for reducing climate pollution in the transportation sector. Goals include 100% of shared mobility being zero emission, 90% of all personal trips to be zero emission by 2030, 30% of goods delivery to be zero emission, 100% of City fleet to be fossil-fuel free, and electrical infrastructure.
- ~~A~~The action alternatives provide for a new Climate Element in the One Seattle Comprehensive Plan addressing GHG reduction policies and climate resilience policies.

Other Potential Mitigation Measures

Although mitigation strategies are not required due to a lack of significant adverse impact findings, to address the potential exposure of residences and other sensitive land uses to air toxic risk areas, discussion of potential mitigation measures is included below.

Transportation-Related Emissions

Transportation-related emissions make up a large portion of criteria pollutant emissions. On-road mobile sources account for approximately half of the overall CO and NO_X emissions within King County (U.S. EPA, 2017). Improvements in fuel efficiency combined with reductions in VMT would contribute to reductions in all criteria pollutant emissions. Replacing fossil-fueled vehicles with ones powered by renewable or cleaner sources of energy (electric, hydrogen, etc.) would result in reductions in CO, NOx, and VOCs.

Vehicle Miles Traveled

Potential VMT-reduction strategies are discussed below.

- **Pedestrian Facilities.** A household activity survey conducted by the Puget Sound Regional Council (PSRC) in 2006 tested the effect of sidewalks on travel patterns and the relationship between sidewalk availability and VMT (SDOT and WSDOT, 2011). Results of the study provide evidence that sidewalk availability combined with land use mix was associated with reduced VMT.
- **Bicycle Improvements.** According to the NCST, bicycle infrastructure has the potential to reduce VMT by encouraging a shift from driving (NCST, 2017). The U.S. EPA estimates that bicycle paths/lanes/routes would provide less than 0.1% reductions in VMT (U.S. EPA, 2014).
- **Transit Improvements.** Transit has been identified as the most frequent and successful tool in reducing VMT (WSDOT, 2022). Transit improvements overall provide a VMT reduction of up to 2.6% (U.S. EPA, 2014).
- **Congestion Pricing, Roadway Fees, and Tolls.** Congestion pricing includes the use of fees for the specific purpose of reducing congestion, such as during peak periods of congestion. Examples include roadway fees and tolls. Congestion pricing has the potential to reduce VMT by approximately 10 to 44% (SDOT, 2019).

- **Land Use Mix and Compactness.** A mix of land uses together with more compact development around transit is associated with reduced VMT (WSDOT, 2022). Diversity in land uses combined with increased density within an urban area can lead to shorter trip distances and greater use of walking, as well as the reduced need for vehicle ownership. Access to a variety of trip purposes may induce additional trips; however, these trips are shorter and are more likely to be made by walking than trips in areas where mixed land uses are not available.

Electric Vehicles

Electric vehicles (EVs) do not create tailpipe emissions (U.S. EPA, 2021). Replacement of gasoline- and diesel-fueled vehicles with EVs would reduce tailpipe emissions within the City of Seattle. However, fugitive dust emissions from brake wear and tire wear would remain the same. Implementation of the Seattle Comprehensive Plan does not directly affect the percentage of EVs within the City. However, implementing goals for EV use including increased charging infrastructure would facilitate and encourage future EV adoption. A combination of charging infrastructure and incentives would encourage electric vehicles in private and public fleets (PSRC, 2020). One of the main barriers to EV adoption is the lack of off-street parking for charging (City of Seattle, 2014). Increased EV penetration would require an expansion of charging options for those without access to charging facilities in their home. Seattle City Light is currently investing in grid upgrades and EV charging infrastructure to enable a rapid transition to an electrified transportation system (SCL, 2023), including Level 2 EV chargers at curbside locations offering service to residents who cannot access off-street parking to charge their vehicles (SCL, 2023). The City could adopt regulations to support the placement of infrastructure for charging electric vehicles in applicable new developments (including commercial and industrial).

Building-Related Emissions

Building energy emissions are a large source of GHG emissions. Decarbonization of buildings by eliminating the combustion of natural gas and other fossil fuels would reduce residential and commercial building emissions (CARB, 2022). ~~All-electric space and water heating is required by the 2022 Washington Energy Code. However, all-electric cooking appliances have not been required. Combined with increasing energy efficiency, building electrification in new buildings would reduce building-related emissions.~~

To lower the GHG contribution from industrial and commercial uses, policies that encourage or mandate new construction projects in the City to incorporate any of the following into their design:

- ~~Achieve one of the following green building standards: Leadership in Energy and Environmental Design (LEED) in Motion: Industrial Facilities, Built Green, the Living Building Challenge, or the Evergreen Sustainable Development Criteria.~~
- Use low-embodied carbon construction material types, such as low-carbon concrete mixes.

- Limit carbon-intensive materials or incentivize use of lower carbon alternatives such as a wood structure instead of steel and concrete, or agricultural products that sequester carbon.
- Salvage materials like brick, metals, broken concrete, or wood.
- Use high-recycled content materials.
- Prioritize adaptive reuse for existing buildings to avoid additional embodied carbon emissions.

Residential Strategies

On-road, railway, port, and aviation activity are main sources of pollutant emissions. The following strategies can reduce the potential levels of air toxics:

- Where the City has authority to do so, the designation of truck routes serving industrial and manufacturing areas away from residential areas would increase buffer areas between some residential neighborhoods and roadways highly travelled by diesel trucks.
- Add denser tree canopy near high-volume roadways and industrial areas, specifically a double-row of long-needle conifers allowing no line-of-site.
- Incorporate standards for more frequent street sweeping to reduce roadway dust associated with increased VMT on high-travelled roadways within 1,000 feet of residential uses.
- Consider zoning standards that identify location, building, and site design provisions that support reduced exposure to potential air toxics.

Improved Air Filtration

The City could adopt new development standards that require or incentivize enhanced air filtering and circulation to address transportation-generated particulates for residences and other sensitive uses (e.g., schools, daycare, hospitals, etc.). For sensitive lands uses in close proximity to industrially zoned areas or highways or other high-traffic roadways, ventilation systems that are capable of filtering fine particulate pollutants (from industrial or transportation sources) could be integrated into HVAC systems to improved indoor quality and reduce exposure to air contaminants. Ventilation systems with a higher Minimum Efficiency Reporting Value (MERV) are capable of removing finer particulate matter from indoor air. Specifically, U.S. EPA recommends higher efficiency filters with a MERV rating of 13 or higher for HVAC filtration (U.S. EPA, 2023). The 2016 ASHRAE handbook for HVAC Systems and Equipment includes air cleaners with MERV ratings in the E-2 range (MERV 9 -12) for application in better residential and industrial air cleaning, which are effective for particulates in the 1.0 to 3.0 μm size range, while those in the E-1 range (MERV 13 – 16) control finer particulates (ASHRAE, 2016).

130th/145th Station Area

Alternatives 2 and 5 and the Preferred Alternative would introduce increases in population within the Station Area, to take advantage of the reduction in emissions inherent to transit-

oriented development. Transit-oriented development is a key strategy for achieving the City's goal to be carbon neutral by the year 2050. However, because the area is also adjacent to heavily used roadways, such as I-5, increasing residential densities in the Station Area could result in increasing the number of residents potentially exposed to elevated levels of air toxics. As shown in **Exhibit 3.2-6,** I-5 is a heavily traveled roadway, with greater than 100,000 vehicles per day. The following strategies can reduce the potential levels of air toxics at residential uses within the Station Area:

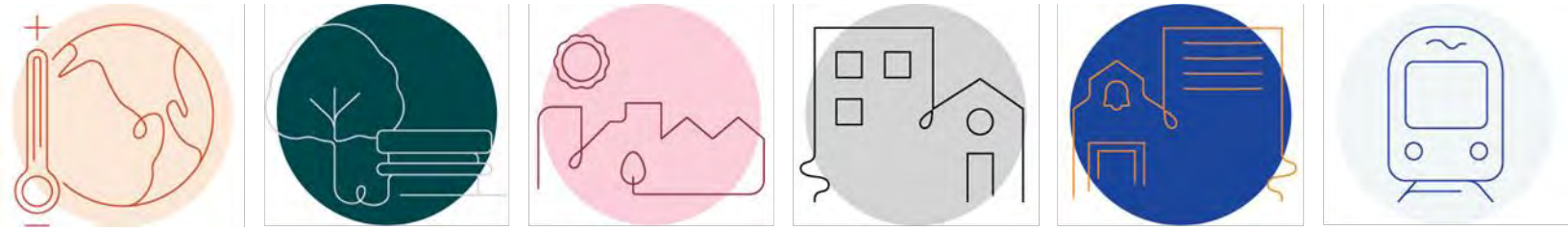
- Incorporation of development standards including requirements for enhanced air filtration and circulation for residential units within the Station Area and site intake vents as far from substantial sources as practicable.
- Building design strategies to minimize the number of residential units facing I-5.
- Planting of trees along streets with residential development and along commercial corridors including but not limited to the reforestation plan for the Lynnwood Link Extension.
- Restrict open spaces such as balconies near the source of toxic air contaminants.
- Restrict operable windows near sources of toxic air contaminants.

3.2.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts to air quality and greenhouse gas emissions are anticipated. Through mitigation implementation, local and state climate actions, and expected continued regulatory changes, the alternatives may result in lower GHG emissions on a per capita basis compared to existing conditions. The alternatives would not prevent or deter statewide, regional, or local efforts to reduce GHG emissions. While each 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.

Intentionally blank

3.3 Plants & Animals





Alki Beach Park. Source: City of Seattle, 2023.

Discussions in this section evaluate, at a broad, programmatic level, the potential impacts of the One Seattle Comprehensive Plan Update proposal and alternatives on plants and animals.

Analyses in this EIS consider all plants and animals that may be affected by the alternatives, with particular emphasis on tree canopy cover and on streams that may receive stormwater runoff from pollution-generating impervious surfaces. This emphasis reflects heightened concern about those two elements of the environment. During the public scoping process, many stakeholders expressed concern about the loss of tree canopy cover in the city. With regard to stormwater, a growing field of research is finding that stormwater runoff contains contaminants that are harmful to fish, including species that are listed as threatened or endangered under the Endangered Species Act (ESA).

Thresholds of significance utilized in this impact analysis include:

- Impacts that would reduce the likelihood that populations of native plant or animal species would persist in or near Seattle~~of survival or recovery of a plant or animal species in the wild~~, compared to the No Action Alternative;
- A substantially increased potential for tree canopy cover loss, compared to the No Action alternative; and
- An appreciable increase in the delivery of stormwater contaminants to fish-bearing streams, compared to the No Action alternative.

Proposals studied in this EIS are focused on a new growth strategy, particularly housing, while employment is fairly constant across alternatives. For the manufacturing industrial centers, employment growth was considered in relation to plants and animals including aquatic and terrestrial species in the Seattle Industrial and Maritime Lands Final EIS, completed September 29, 2022. That Final EIS is hereby incorporated by reference, in particular **Section 3.3 Plants & Animals**.[18]

3.3.1 Affected Environment

The following subsections provide overviews of general concerns relating to plants and animals citywide, with special attention to tree canopy cover and contaminants in stormwater runoff. These overviews are followed by brief descriptions of the tree canopy cover and the presence of fish-bearing streams in the eight analysis subareas and the 130th and 145th Street Station Area.

Citywide

Habitats in Seattle support a wide range of plant and animal communities. The abundance and diversity of species in any given area vary with the degree of urban development. More intensely developed areas (parcels dedicated to commercial and/or industrial uses, for example) generally have little vegetative cover and support a comparatively small number of wildlife species that are adapted to high levels of human activity. Many of the plants and

[18] See project documents, available: https://www.seattle.gov/opcd/ongoing-initiatives/industrial-and-maritime-strategy#projectdocuments.

animals in such areas are not native to the region. More diverse assemblages of plants and animals, including native species, may be found in less-developed areas—parks and open spaces, for example. Trees offer structural diversity that provides habitat for a wide range of species; areas in the city with extensive tree canopy cover are likely to support comparatively diverse plant and animal communities. Parks and undeveloped stream corridors may provide movement corridors for mammals and amphibians.

Many residential areas include trees and other vegetation (native or non-native) interspersed with buildings and impervious surfaces. These conditions generally support plant and animal communities that are intermediate between intensely developed areas and parks and open spaces, in terms of diversity and abundance. 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.

The plant and animal species found in Seattle are widespread in the region.~~; s~~Some of these species are globally abundant; populations of some species are declining. For species associated with certain habitat types (e.g., heavily vegetated residential lots), urban development and redevelopment have the potential to contribute to further declines. Areas in the city limits represent a very small proportion of the total amount of habitat available to any given species. ~~The only~~ ESA-listed Chinook salmon and steelhead ~~or state-listed species known or expected to~~ are present in some streams ~~use habitats~~ in the city ~~are fish (steelhead and Chinook salmon)~~. These and other ESA-listed and state-listed species are also present in marine waters that receive stormwater runoff from the city, including bull trout, rockfish, marbled murrelets, and Southern Resident killer whales.

Tree Canopy Cover

Canopy cover is the percentage of the city's land area that is covered by trees, as seen in an aerial view. Canopy cover is an important management tool for planners to understand the extent and distribution of trees in Seattle. The city's goal, established in 2007, is to have 30% tree canopy cover by 2037.

Trees are critical infrastructure that provide essential benefits, including the following:

- Sequestering carbon (i.e., capturing and storing carbon dioxide from the atmosphere, reducing the input of a key greenhouse gas)
- Providing shade and reducing heat
- Absorbing pollution
- Improving physical and mental health
- Providing habitat for plants and animals
- Intercepting a portion of rainfall, reducing overall stormwater runoff

Trees play a vital role in moderating temperatures in urban areas. Tree canopy provides cooling both through shading and through evapotranspiration. Shading blocks incoming heat energy and prevents impervious surfaces from absorbing it and radiating back into surrounding areas. Evapotranspiration is the process by which plants absorb water through

their roots and release it as vapor through their leaves. This process of converting liquid to gas uses heat from surrounding areas and thus cools the air. In general, areas with more canopy cover have cooler temperatures, compared to areas with less canopy cover. Increasing canopy in low-canopy neighborhoods is a critical aspect of the City's long-term heat preparedness strategy (Seattle Office of Sustainability & Environment 2022).

In 2022, the Seattle Office of Sustainability & Environment completed a citywide review of tree canopy cover. The study used lidar data to determine the extent of tree canopy cover in 2016 and 2021 and to identify areas where cover increased or decreased during that 5-year period. The study also identified parcels that were redeveloped during that period, to allow an assessment of the amount of canopy change that might be attributable to housing projects versus other causes. Sites were considered redeveloped if they included any new housing units.

Key findings of the canopy cover assessment included the following:

- Canopy cover decreased by 255 acres between 2016 and 2021—an area roughly the size of Green Lake. As canopy cover decreases, the benefits identified above are diminished.
- The city is below its goal for canopy cover. Total cover in 2021 was 28%, compared to a goal of 30%.
- Loss is happening inequitably. Neighborhoods impacted by racial and economic injustice started with less canopy and lost more than the citywide average.
- The greatest net losses occurred in parks and natural areas and on residential parcels where development projects did not occur.
- Climate change poses serious challenges for trees, while also making trees more essential. Climate change brings new pests and diseases, along with increased watering and maintenance needs. At the same time, trees are critical climate infrastructure, protecting us from extreme heat and improving air quality.

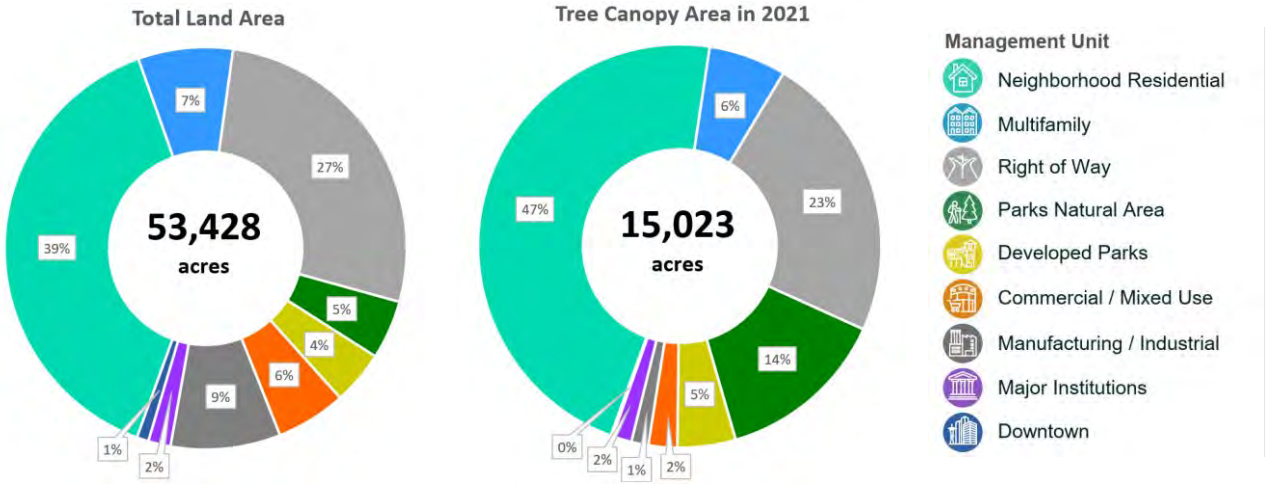
Many factors contributed to citywide losses of tree canopy cover during the study period. Examples include:

- Natural mortality: in any urban forest, a certain portion of trees are likely to die or be removed as they become hazardous. As trees age, they are more likely to lose large branches, become hazardous, or succumb to pests, disease, or drought stress.
- Climate change: hotter, drier summers exacerbate drought stress.
- Forest management: in some parks and natural areas, aging deciduous trees are dying or being removed to allow for the establishment of conifers that provide more ecosystem benefits. Invasive species are also making it difficult for new trees to establish themselves.
- Public safety: in some areas, aging or unhealthy trees pose a risk to residents or park users and must be removed.
- Competing uses: trees are removed due to resident preferences, residential and commercial development projects, and infrastructure changes such as transportation and utilities.

These losses were partially offset by gains as existing trees grew taller and broader. Trees less than 8 feet tall were excluded from the analysis, so most newly planted trees were not factored into the calculation of tree canopy gains.

The tree canopy cover assessment divided the city into nine management units, based on land uses. The different management units have different proportions of tree canopy cover (**Exhibit 3.3-1**). For example, only 5% of the city is in the Parks and Natural Areas management unit, but 14% of the city's tree canopy cover is in that management unit. Conversely, the management units that support more high-intensity land uses (Commercial/Mixed Use, Manufacturing/Industrial, Major Institutions, Downtown) represent more than 17% of the city's total land area but provide only 5% of the tree canopy cover. The Neighborhood Residential management unit encompasses the largest proportion of the city's total land area, and it provides an even larger proportion of the city's tree canopy cover (**Exhibit 3.3-1**).

Exhibit 3.3-1. Land Area and Tree Canopy Cover, by Management Unit

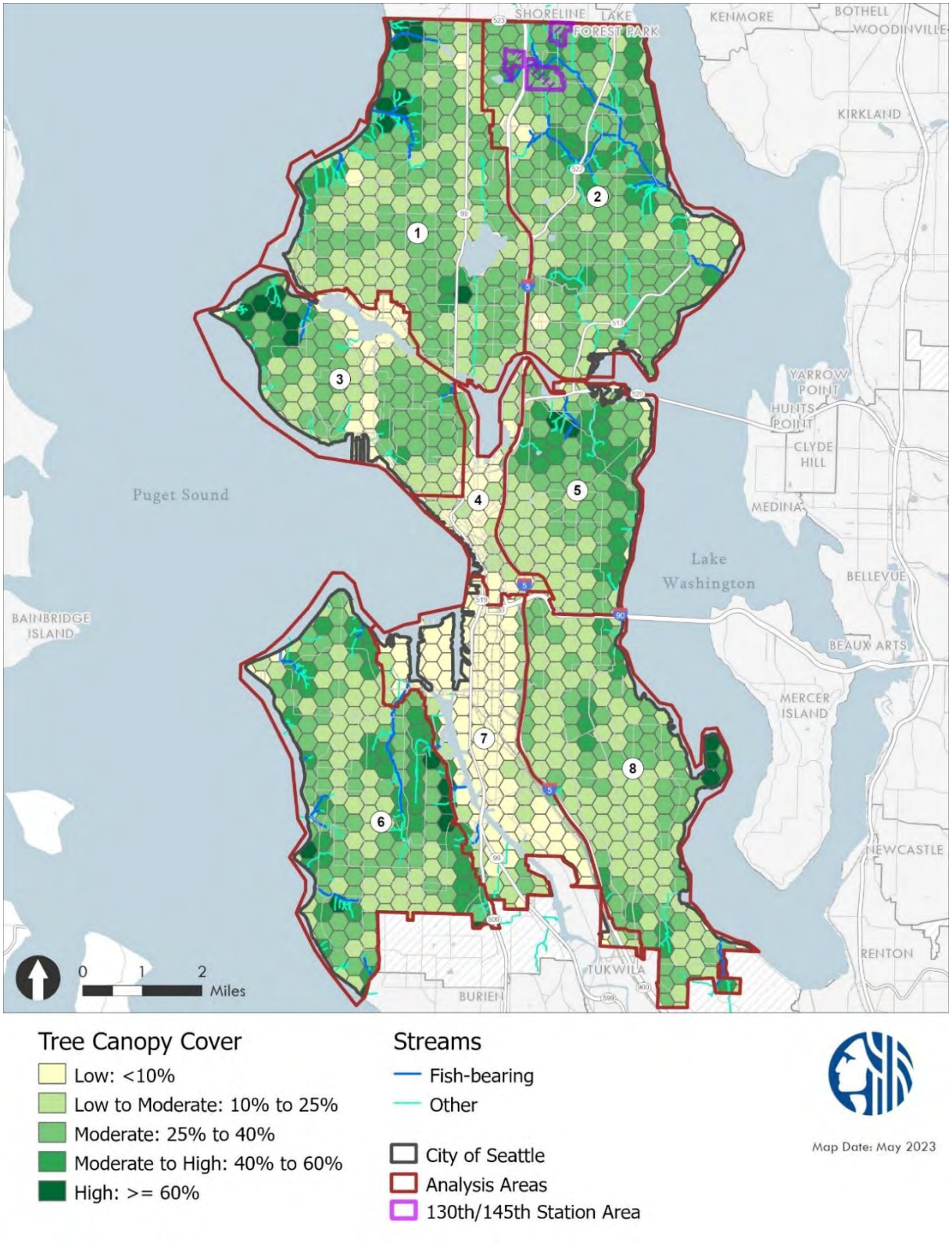


Source: Seattle Office of Sustainability & Development, 2022.

Trees in public rights-of-way play an important role in contributing to canopy cover citywide. Rights-of-way make up 27% of the city's land area, and trees in this management unit contribute 23% toward the city's canopy cover—second only to the Neighborhood Residential management unit (**Exhibit 3.3-1**). Given the constraints of limited space and soil volume that planting strips can provide, trees in this management unit face extra challenges. Soil quality can also be a challenge, particularly in areas that have been used for parking or other activities that compact soil (Seattle Office of Sustainability & Development 2022). These challenges mean that frequent maintenance and care for existing trees in rights-of-way is essential. Most trees in the Right of Way management unit (around 84%) are privately managed by adjacent landowners; the remainder are managed by the City (Seattle Office of Sustainability & Development 2022).

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 canopy is largely absent from Downtown and major industrial areas along the Duwamish Waterway and in Interbay.

Exhibit 3.3-2. Existing Tree Canopy Cover in Seattle



Sources: Seattle Office of Sustainability & Development, 2022; Washington Department of Natural Resources, 2023.

Between 2016 and 2021, tree canopy cover decreased in all management units except Downtown, where it remained essentially unchanged (**Exhibit 3.3-3**). The greatest acreage of canopy loss—more than three-quarters of the total loss—occurred in the Parks and Natural Areas and Neighborhood Residential management units. 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 (**Exhibit 3.3-3**). 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.

Exhibit 3.3-3. Total Area and Proportion of Tree Canopy Loss on Parcels That Underwent Development, by Management Unit

Management Unit	Tree Canopy Loss, 2016-2021 (acres)	Percentage of That Loss Occurring on Parcels That Underwent Development
Neighborhood Residential	87	19%
Multifamily	19	75%
Right of Way	10	1%
Parks and Natural Areas	111	0%
Developed Parks	5	0%
Commercial/Mixed Use	6	63%
Manufacturing/Industrial	6	7%
Major Institutions	12	0%
Downtown	0	0%
Total	**256**	**14%**

Source: Seattle Office of Sustainability & Development, 2022.

Of the 511 acres that underwent development during the study period, 291 acres (57%) were on parcels in the Multifamily or Neighborhood Residential management units. However, those two management units saw 88% of the total tree canopy loss on parcels that underwent development (31 of 35 acres). Most of the remaining 12% of development-related canopy loss happened on parcels in the Commercial/Mixed Use management unit (Seattle Office of Sustainability & Development 2022).

The disproportionate amount of development-related canopy loss on Multifamily and Neighborhood Residential parcels may be a product of the greater amount of tree canopy cover in those management units. In 2021, the total canopy cover for areas in the combined Multifamily and Neighborhood Residential management units was approximately 32%; canopy cover for areas in the Commercial/Mixed Use management unit was 11% (Seattle Office of Sustainability & Development 2022). Parcel size may also play a role. On average, Multifamily

and Neighborhood Residential are smaller than Commercial/Mixed Use parcels. Logistical constraints make it difficult to avoid impacts to trees when developing a small parcel.

Notably, more than 80% of the canopy loss that occurred in the Neighborhood Residential management unit happened on parcels where development did not take place (**Exhibit 3.3-3**). This may indicate that much of the canopy loss in the Neighborhood Residential management unit resulted from natural mortality or from actions (e.g., pruning, tree removal) unrelated to development activities.

The City aims to prioritize urban forestry efforts in low-canopy areas. Many of these areas also have disadvantaged populations, as indicated by race, language, origin, socioeconomic conditions, and health issues. The 2022 City of Seattle Tree Canopy Assessment also found that, in 2016, areas with disadvantaged populations had 16% less canopy cover than other areas. The disparity was exacerbated by canopy loss between 2016 and 2021. By 2021, areas with disadvantaged populations had 20% less canopy cover than other areas.

Residential areas with a combination of disadvantaged populations and low canopy cover are primarily in Area 4 (Belltown, International District, South Lake Union), Area 6 (South Delridge and Highland Park neighborhoods), Area 7 (South Park and Georgetown neighborhoods), and Area 8 (Beacon Hill, Brighton, and Rainier Beach neighborhoods). Additional neighborhoods with that combination include Atlantic (Area 5), Bitter Lake (Area 1), and Greenwood (Area 1).

Stormwater Runoff

Since the 1990s, biologists studying salmon in urban streams have documented alarmingly high numbers of coho salmon dying before being able to spawn (e.g., McCarthy et al. 2008). Studies in several Seattle-area streams (including Longfellow, Thornton, Piper's, Taylor, and Fauntleroy creeks) have found rates of pre-spawning mortality in excess of 86% (Scholtz et al. 2011). More recent research has found 6PPD-quinone, a contaminant originating in vehicle tires and found in runoff from roadways, to be a major contributor to pre-spawning mortality in coho salmon (Tian et al. 2021). Other contaminants, such as metals and polycyclic aromatic hydrocarbons, are also associated with adverse effects on salmonids and their prey. Contaminants in stormwater runoff have also been found to have harmful effects on ESA-listed Chinook salmon and steelhead (National Marine Fisheries Service 2022).

Some types of stormwater treatment facilities, such as bioretention facilities, prevent the acute lethal effects of stormwater on salmonids (Spromberg et al. 2015). Other types of facilities, such as compost-amended bioswales, are also effective at removing a variety of contaminants from runoff, including metals and polycyclic aromatic hydrocarbons (Fardel et al. 2020; McIntyre et al. 2015). However, residual contaminants in stormwater runoff can still harm fish, even after the water has been treated to reduce pollutant loads. In addition, the capacity of treatment facilities may be exceeded during major storm events, and untreated stormwater may bypass the facilities.

Based on the above, the discharge of stormwater runoff to fish-bearing streams has the potential to harm fish, including ESA-listed species. Terrestrial wildlife may also be affected by

contaminants in stormwater runoff that enters surface waters, either through direct exposure (e.g., drinking) or by consuming contaminated fish. ~~As noted above, the only ESA-listed or state-listed species known or expected to use habitats in the city are fish.~~ Directing runoff to treatment facilities reduces the risk of harm, but it may not eliminate that risk altogether.

Stormwater runoff also has the potential to affect stream flows. During storm events, rainwater rapidly runs off from impervious surfaces and into pipes and other systems that deliver the water directly to streams. This results in high-volume, rapid peak flows that damage stream habitat and contribute to erosion and sedimentation. These impacts can be reduced by directing stormwater to facilities that detain runoff and allow it to enter streams more gradually.

Section 3.1.1 in **Earth & Water Quality** identifies the streams that receive stormwater runoff from impervious surfaces (including pollution-generating surfaces) in the city. The following subsections provide information about the known or expected presence of fish in these streams. Discussions in this EIS emphasize salmonids—anadromous salmonids in particular—because these species are a management concern due to habitat degradation and population declines.

Note that stormwater runoff can enter ~~fish-bearing streams~~ surface waters that are a considerable distance away. Pipes and ditches can convey runoff for several miles, discharging contaminated water to a stream in a different area. Conversely, stormwater from many parts of the city is piped to King County's West Point Wastewater Treatment Plant in Discovery Park. Treated effluent from the plant is discharged to Puget Sound approximately 3,600 feet offshore of West Point and is extremely unlikely to contribute to pre-spawning mortality in salmonids.

Areas

The following subsections provide a general overview of tree canopy cover in each of the eight analysis subareas and the 130th and 145th Street Station Area. Discussions also identify areas of notably heavy tree canopy cover, as well as streams with documented or potential fish use.

Area 1

Northwest Seattle includes some of the most densely forested areas in the city. Parks (e.g., Golden Gardens Park, Carkeek Park), greenspaces, and residential areas along the bluffs bordering Puget Sound include several areas with more than 60% canopy cover (**Exhibit 3.3-2**). Woodland Park also includes some areas with relatively high canopy cover. Neighborhoods with moderate to high canopy cover (generally 25 to 60%) include Broadview, Bitter Lake, Blue Ridge, North Beach, Phinney Ridge, Green Lake, Fremont, and Wallingford.

Mapping provided by the Northwest Indian Fisheries Commission (NWIFC) indicates that Piper's Creek in Carkeek Park supports coho salmon and ESA-listed Chinook salmon (NWIFC 2023). Using a topography-based model, the Washington Department of Natural Resources (WDNR) identified two additional potentially fish-bearing streams in this area, both of which

are unnamed tributaries to Puget Sound (WDNR 2023). One drains westward from Bitter Lake, and the other drains northward from North Beach Park.

Area 2

Most of northeast Seattle has a relatively high proportion of tree canopy cover (generally more than 30%; **Exhibit 3.3-2**). The areas with the greatest canopy cover are in parks (e.g., Matthews Beach Park), greenspaces, and residential areas near Thornton Creek and its tributaries and along Lake Washington. Additional areas of comparatively high canopy cover include Northacres Park and Ravenna Park. Nearly all neighborhoods in Area 2 have moderate to high canopy cover. The exceptions are the neighborhoods with substantial commercial centers (e.g., Northgate, Roosevelt, University District), as well as Magnuson Park.

Almost all of northeast Seattle is in the Thornton Creek watershed. According to NWIFC (2023), Thornton Creek and its tributaries provide spawning habitat for ESA-listed Chinook salmon as well as coho and sockeye salmon. Cutthroat trout and ESA-listed steelhead have also been documented in the watershed. Chinook, coho, and sockeye salmon also have the potential to be present in Yesler Creek, a tributary to Union Bay near the western edge of the Laurelhurst neighborhood. These species are also present in Lake Washington, which receives stormwater runoff from parts of Area 2.

WDNR (2023) identifies two additional potentially fish-bearing streams in this area. One is an unnamed tributary that flows from Haller Lake to the north branch of Thornton Creek, and the other is an unnamed tributary that enters Lake Washington immediately south of Magnuson Park.

130th/145th Study Area

The 130th/145th Study Area consists of two units: an approximately 65-acre area near the intersection of 15th Ave NE and NE 145th Street and an approximately 218-acre area spanning I-5 near the Sound Transit light rail station at NE 130th Street. Both units include areas of comparatively high canopy cover near Northacres Park (NE 130th Street unit) and along the north branch of Thornton Creek near Jackson Park Golf Course (both units).

Reaches of the north branch of Thornton Creek in this area have the potential to provide habitat for Chinook, coho, and sockeye salmon. Steelhead and cutthroat trout have been documented in these reaches (NWIFC 2023).

Area 3

The West subarea includes two neighborhoods with relatively high levels of tree canopy cover (Magnolia and Queen Anne), separated by the Interbay industrial area (**Exhibit 3.3-2**). The areas with the greatest canopy cover are Magnolia bluff, Discovery Park, Kiwanis Memorial Preserve Park, Kinnear Park, and greenbelts along the western and northern slopes of Queen Anne Hill.

NWIFC (2023) does not identify any fish-bearing streams in Area 3. WDNR (2023) identifies two potentially fish-bearing streams, both of which are tributaries to the Ship Canal. One is Wolfe Creek (a small stream that flows north from Kiwanis Memorial Preserve Park), and the other is an unnamed tributary that originates on the northern slopes of Queen Anne Hill near Mayfair Park. Chinook, coho, and sockeye salmon are present in the Ship Canal, which receives stormwater runoff from parts of Area 3.

Area 4

The Downtown/South Lake Union subarea does not contain any areas with more than 10% tree canopy cover. Several species of salmonids (Chinook, coho, and sockeye salmon, steelhead, cutthroat trout) have been documented in Lake Union, which receives stormwater runoff from parts of this area (NWIFC 2023). No streams with documented or potential fish use have been identified in this area (NWIFC 2023; WDNR 2023).

Area 5

Areas with relatively high levels of tree canopy cover include Volunteer Park, Interlaken Park, Washington Park Arboretum, Frink Park, Leschi Park, and residential areas along the shores of Lake Washington. Areas dominated by commercial/mixed uses and multifamily housing (primarily west of 23rd Avenue and south of Volunteer Park) generally have less canopy cover than the rest of the subarea.

NWIFC (2023) does not identify any fish-bearing streams in Area 5. WDNR (2023) identifies one potentially fish-bearing stream in the area: an unnamed tributary to Union Bay, originating in Interlaken Park. According to NWIFC (2023), Chinook, coho, and sockeye salmon, steelhead, cutthroat trout have been documented in Lake Washington (including Union Bay and Portage Bay), which receives stormwater runoff from parts of this area.

Area 6

Areas with relatively high proportions of tree canopy cover include parks, greenspaces, and residential areas along Puget Sound and on hillslopes west of the Duwamish Waterway (**Exhibit 3.3-2**). Areas with the greatest density of canopy cover include Lincoln Park, Fauntleroy Park, the West Duwamish greenspace, and the Arroyo Heights natural area. Neighborhoods with moderate to high canopy cover include North Admiral, Riverview, Fauntleroy, Arbor Heights, and Highland Park. Areas with lower canopy cover include commercial and residential areas near the West Seattle Junction, along California Ave SW, and in the High Point and South Delridge neighborhoods.

According to NWIFC (2023), Longfellow Creek supports spawning by coho salmon. Cutthroat trout have also been documented in the stream, and Chinook salmon, chum, salmon, and steelhead could potentially use habitats in the Longfellow Creek system. With the exception of

cutthroat trout, all of these species could potentially use habitats in Puget Creek, a small stream that enters the Duwamish Waterway near the Duwamish Longhouse and Cultural Center.

The two other Area 6 streams with documented fish use are Fauntleroy Creek (coho salmon and cutthroat trout) and a small stream that enters the Duwamish Waterway near the 1st Avenue South Bridge (coho salmon). Species present in the Duwamish Waterway (which receives stormwater runoff from parts of Area 6) include Chinook, chum, coho, pink, and sockeye salmon, steelhead, and cutthroat trout.

WDNR (2023) identifies six additional potentially fish-bearing streams in Area 6:

- Fairmont Creek (a small stream that originates in the North Admiral neighborhood and drains to Elliott Bay)
- An unnamed tributary that enters the Duwamish Waterway approximately 0.5 mile north of the 1st Avenue South Bridge
- An unnamed tributary that enters Puget Sound at Seola Park in the southwestern corner of the city
- An unnamed tributary that enters Puget Sound at Lowman Beach Park north of Lincoln Park
- An unnamed tributary that enters Puget Sound approximately 0.5 mile south of Mee-Kwa-Mooks Park
- An unnamed tributary that originates in Schmitz Preserve Park and drains to Puget Sound

Area 7

The Duwamish Manufacturing Industrial Center subarea contains almost no areas with more than 10% tree canopy cover. The exceptions are in residential areas. Some Neighborhood Residential and Multifamily areas in the Georgetown neighborhood have approximately 15% canopy cover. Ares with greater canopy cover—25 to 30%—occur in residential areas in the South Park neighborhood.

Several streams that originate in Area 6 briefly pass through Area 7 before discharging to the Duwamish Waterway. These are Longfellow Creek, Puget Creek, and the two unnamed tributaries that enter the waterway near and approximately 0.5 mile north of the 1st Avenue South Bridge. Runoff from most of Area 7 discharges to the Duwamish Waterway. Some is piped several miles north to King County's West Point Wastewater Treatment Plant in Discovery Park.

Area 8

Much of southeast Seattle is characterized by areas with comparatively low canopy cover (**Exhibit 3.3-2**). In contrast to other parts of the city, this is true even in residential areas. The exceptions are the residential areas bordering Lake Washington, where canopy cover is moderate to high. Away from Lake Washington, areas with relatively high canopy cover are largely limited to greenspaces and parks associated with ravines and the steep slopes of Beacon Hill.

NWIFC (2023) does not identify any fish-bearing streams in Area 8, while WDNR (2023) classifies Taylor Creek as potentially fish-bearing. Monitoring studies have confirmed that the lowermost reaches of Taylor Creek (between Rainier Avenue South and Lake Washington) provide rearing habitat for juvenile Chinook and coho salmon from other stream systems (Tabor and Moore 2020). The same study found juvenile Chinook and coho salmon in a recently daylighted reach of Mapes Creek downstream of Seward Park Avenue South.

3.3.2 Impacts

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. For these reasons, all ~~five~~ alternatives would have the same potential for adverse effects on special-status plants and animals citywide and in the various analysis subareas. The action alternatives would include policies to maintain and enhance tree canopy in rights of way and city property and to expand tree canopy throughout the community, prioritizing residential and mixed-use areas with the least current tree canopy. These policies could lead to beneficial effects for some species.

In addition, 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 in areas in and near Seattle. Based on these considerations, none of the alternatives would be expected to result in impacts that would reduce the likelihood that populations of native plant or animal species would persist in or near Seattle~~of survival or recovery of a plant or animal species in the wild~~.

Development and redevelopment projects would, however, have the potential for localized impacts on plant and animal communities. 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. 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.

Development and redevelopment projects have the potential to affect species and habitats in adjacent parks and natural areas. For example, replacing single-story houses with taller structures may increase shading of nearby vegetation. Also, clearing of vegetation on private parcels may diminish the habitat value of vegetation in adjoining areas of parks or natural areas. The extent of these potential impacts is limited because most parks and natural areas are bordered by public rights-of-way instead of private parcels. In addition, residential areas near most parks and natural areas have lower height limits than elsewhere. The potential for adverse impacts is further limited by regulations that encourage tree retention and require

replacement of trees that are removed from private parcels. Finally, the potential for such impacts to result in long-term reductions in tree canopy would be limited by policies and goals in the One Seattle Plan, including policies for updating forest management plans, decisions, and actions in response to changes and trends in tree canopy cover (see **Section 3.3.3**).

Development and redevelopment projects in or near riparian zones and other areas of relatively undisturbed habitat may degrade habitat quality or disrupt the behavior of terrestrial wildlife that use those areas as travel corridors. The potential for substantial adverse effects is low, however, because most such areas are classified as environmentally critical areas and protected during project reviews.

In addition to providing protection for plants and animals in general, existing regulations, policies, and practices encourage the retention and expansion of tree canopy and the minimization of contaminants delivered to surface waters, including fish-bearing streams. Applicable regulations include those restricting the removal of trees on private property (SMC Chapter 25.11, Tree Protection), limiting disturbance and requiring mitigation in Environmentally Critical Areas (SMC Chapter 25.09 and 23.60A), regulating street trees, requiring landscaping and tree planting, and implementing stormwater requirements (see **Section 3.3.3** for more details).

Even though several of these regulatory requirements directly or indirectly limit tree removal, the results of the 2022 City of Seattle Tree Canopy Assessment demonstrate that the regulations in effect at that time 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. See **Section 3.3.3** for additional discussion of the mitigative potential of Seattle's current regulations. 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.

Impacts Common to All Alternatives

The One Seattle Comprehensive Plan Update proposal and alternatives address where residential and commercial development will happen within the city limits. Based on the results of the citywide review of tree canopy cover, 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 (see **Section 3.3.1**). This is particularly true of parcels with lower-density residential designations, where existing canopy cover is higher than elsewhere (**Exhibit 3.3-1**). As such, strategies that convert

parcels with lower-density residential designations to higher-density designations could result in localized reductions in ~~reduce the total amount of~~ tree canopy cover ~~in the city~~.

The findings of the 2022 Tree Canopy Assessment indicate that canopy loss on parcels that underwent development between 2016 and 2021 represented a very small proportion of the total tree canopy in the city—less than 0.25 percent (35 acres out of more than 15,000 acres). The proportion of the city's overall tree canopy vulnerable to development-related canopy loss in any given 5-year period is not likely to differ substantially from that percentage. This expectation is based on the practical and economic constraints that limit the number of parcels that can be developed or redeveloped in any given year, combined with policies and regulations designed to reduce the rate of canopy loss associated with residential and commercial development.

In addition, as discussed above, 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. Even with these considerations, however, development and redevelopment projects may result in temporal loss of the benefits provided by tree canopy. That is to say, when established trees are replaced by newly planted trees, it may take many years for the planted trees to gain sufficient canopy area and volume to replace the functions of the trees they replace. This loss would be offset over time by the growth and development of trees that have already been planted to replace trees removed for past development projects.

summarizes the amount of area that would be assigned to various place types under the alternatives. The values in this exhibit are drawn from **Exhibit 2.4-3**, **Exhibit 2.4-8**, **Exhibit 2.4-14**, **Exhibit 2.4-17**~~, and~~ **Exhibit 2.4-20**, and **Exhibit 2.4-26** in **Chapter 2**. Analyses in this section are based on the expectation that reducing the amount of area dedicated to lower-density residential uses (and, by the same token, increasing the amount of area available for conversion to higher-density uses) would lead to an elevated risk of impacts to vegetation (including loss of tree canopy) on redeveloped parcels and in nearby road rights-of-way. ~~In other words, a higher value in the "New place types" row in **Exhibit 3.3-4** indicates a higher potential for development-related impacts to vegetation.~~

~~Exhibit 3.3-. Comparison of Impacts from Each Alternative~~

	~~Size in Acres (Approx)~~				
~~Place Type~~	~~Alt. 1~~	~~Alt. 2~~	~~Alt. 3~~	~~Alt. 4~~	~~Alt. 5~~
~~Existing Centers and Villages[1]~~	~~10,131~~	~~10,131~~	~~10,131~~	~~10,131~~	~~11,528~~
~~New place types[2]~~	~~0~~	~~2,923~~	~~32,581~~	~~20,420~~	~~32,294~~
~~Place types not changing in alternative[3]~~	~~33,633~~	~~30,768~~	~~1,052~~	~~13,213~~	~~0~~
~~Manufacturing/Industrial~~	~~5,896~~	~~5,896~~	~~5,896~~	~~5,896~~	~~5,896~~
~~Place types not changing in all alternatives[4]~~	~~3,854~~	~~3,854~~	~~3,854~~	~~3,854~~	~~3,854~~

~~Notes:~~
~~1 Includes areas designated as urban centers or urban villages (under Alternative 1, No Action) or as regional centers or urban centers (under the action alternatives).~~

~~2 Includes areas that would be classified as neighborhood centers, urban neighborhoods, or corridors under the action alternatives. It is assumed for this analysis that most such areas are currently zoned for single-family residential or other low-density uses and would remain so under Alternative 1, No Action.~~
~~3 Includes areas classified as "Outside Subareas" in **Exhibit 2.4-3**, **Exhibit 2.4-8**, **Exhibit 2.4-14**, **Exhibit 2.4-17**, and **Exhibit 2.4-20**.~~
~~4 Consists of areas classified as "Outside Subareas" common to all alternatives in **Exhibit 2.4-3**, **Exhibit 2.4-8**, **Exhibit 2.4-14**, **Exhibit 2.4-17**, and **Exhibit 2.4-20**.~~
~~Sources: City of Seattle, 2024; BERK, 2024.~~

~~Under Alternative 5, in addition to the areas in the "new place types" category, approximately 1,400 more acres would fall in the "existing centers and villages" category, compared to the other alternatives (**Exhibit 3.3-4**). Most parcels in the areas that would be converted to the "existing centers and villages" category are currently zoned for lower-density residential uses. Therefore, it is assumed for this analysis that the converted areas would face a higher potential for development-related impacts to vegetation under Alternative 5, compared to the other alternatives.~~

For this Final EIS, analysts also estimated the acreage of land potentially developed for residential purposes under each alternative. This approach is based on the anticipated distribution of new housing units in each place type. Considering different place types and likely densities, analysts estimated the square footage of land likely to be developed per new housing unit in each place type. By multiplying that area by the anticipated number of new housing units in each place type, the total area that may be affected by residential development projects during the 20-year planning period can be estimated. These estimates are presented in **Exhibit 3.3-4**. See **Appendix G** for a more detailed presentation of this analysis.

Exhibit 3.3-4. Estimated Area (Acres) That May Be Affected by Residential Development under Each Alternative

Place Type	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Preferred
Center (Existing or New)[1]	984	1,401	984	1,215	1,458	1,252
Outside Subareas (Continued Development)[2]	501	254	176	332	116	97
Urban Neighborhood[3]	0	0	1,330	0	525	1,249
Corridor[4]	0	0	0	455	246	159
Urban Neighborhood—Other Multifamily	0	0	0	0	0	13
Total	**1,485**	**1,655**	**2,490**	**2,002**	**2,345**	**2,770**

Notes: This exhibit is new since the Draft EIS.
[1] Under Alternative 1, this includes areas classified as urban centers, urban villages, manufacturing-industrial centers, and Growth Area (maritime industrial). Under the action alternatives, this includes areas classified as regional centers, urban centers, and neighborhood centers.

[2] Includes areas classified as "Outside Subareas" common to all alternatives in **Exhibit 2.4-3**, **Exhibit 2.4-8**, **Exhibit 2.4-14**, **Exhibit 2.4-17**, **Exhibit 2.4-20**, and **Exhibit 2.4-26**. No change to place type is proposed in these areas, but growth would continue to occur throughout the 20-year planning period. Under the Preferred Alternative, all lands in the city would be assigned a new place type, and no areas are classified as "Outside Subareas." The estimated development area for this place type under the Preferred Alternative reflects growth assigned to sites that were classified as "Outside Subareas" under Alternatives 1-5, regardless of their assigned place type under the Preferred Alternative.
[3] Under Alternatives 3 and 5, this consists of areas classified as urban neighborhood. Under the Preferred Alternative, this consists of areas classified as urban neighborhood—neighborhood residential.
[4] Under Alternatives 4 and 5, this consists of areas classified as corridor. Under the Preferred Alternative, this consists of areas classified as urban neighborhood—frequent transit corridor.
Sources: City of Seattle, 2025; Parametrix, 2025; BERK, 2025.

The amount of vegetation that would be affected by development in the areas identified in would depend on the condition of the parcels undergoing development. The locations of those parcels cannot be predicted, nor can the condition of the vegetation they may support when development occurs in the future. The evaluation of each alternative's potential to affect vegetation is based on the assumption that, as the total area of residential development increases, so would the risk of impacts to vegetation. In other words, the Total values in indicate the alternatives' relative potential to affect vegetation, including tree canopy cover.

~~The total number of demolitions under each alternative is summarized in **Exhibit 3.8-44**. These numbers can provide a high-level indication of the amount of land that would be redeveloped over a 20 year period, particularly in existing Neighborhood Residential zones where the number of units per lot area does not vary substantially. Alternatives 3 and 5 would result in the largest number of demolitions which would tend to result in more area of redevelopment.~~

Since Alternative 1 and the Preferred Alternative have both place type and zoning level information, a further comparison is shared below regarding how Neighborhood Residential Zones would change between the two alternatives. See **Exhibit 3.3-5** and **Exhibit 3.3-6**. Most of the Neighborhood Residential Zone would be within an urban neighborhood designation (88%). While there is a potential for additional housing types per HB 1110 and alteration of existing vegetation and tree canopy, there is also an opportunity to retain tree canopy with amended zoning standards as described in **Section 3.6.2**. Another 5% of Neighborhood Residential Zone would be designated as urban neighborhood—frequent transit corridor, and there is a greater potential for intensification and change to existing vegetation and tree canopy. Another 8% each would be designated either neighborhood center or urban center with greater intensity that may also result in change to existing vegetation and tree canopy. Where intensification occurs and there is change to existing vegetation and tree canopy landscape standards and tree canopy regulations would apply.

Exhibit 3.3-5. NR Zone Site Acreage by Preferred Alternative Place Type

Existing	Preferred Alternative						
No Action Zone	Place Type	Regional Center—Metro	Regional Center—Urban	Urban Center	Neighborhood Center	Corridor	Urban Neighborhood
NR1	Outside Subareas	0	0	0	0	3	571
NR2	Outside Subareas	0	1	132	30	234	4,116
NR2	Hub Urban Village	0	0	0	0	0	0
NR3	Outside Subareas	21	0	425	585	499	9,135
NR3	Residential Urban Village	0	0	41	0	0	0
NR3	Hub Urban Village	0	0	1	0	0	0
Total (Rezoned Parcels Only)		**21**	**1**	**599**	**616**	**737**	**13,823**
Percent of total		**0.1%**	**0.0%**	**4%**	**4%**	**5%**	**88%**

Note: This exhibit is new since the Draft EIS.
Sources: City of Seattle, 2024; BERK, 2025.

Exhibit 3.3-6. NR Zone Preferred Alternative Housing Growth by Place Type

Existing	Preferred Alternative						
No Action Zone	Place Type	Regional Center—Metro	Regional Center—Urban	Urban Center	Neighborhood Center	Corridor	Urban Neighborhood
NR1	Outside Subareas	0	0	0	0	49	582
NR2	Outside Subareas	0	0	1,388	441	2,765	5,128
NR2	Hub Urban Village	0	0	0	0	0	0
NR3	Outside Subareas	647	0	3,350	6,763	5,695	15,222
NR3	Residential Urban Village	0	0	30	0	0	0
NR3	Hub Urban Village	0	0	1	0	0	0
Total (Rezoned Parcels Only)		**647**	**0**	**4,768**	**7,204**	**8,508**	**20,932**
Percent of total		**2%**	**0%**	**11%**	**17%**	**20%**	**50%**

Note: This exhibit is new since the Draft EIS.
Sources: City of Seattle, 2024; BERK, 2025.

Canopy cover loss could also occur due to non-residential development. However, the amount of tree loss due to non-residential development is not likely to vary substantially between the alternatives as total job growth would not vary between the alternatives and because urban development associated with new jobs would tend to occur in existing commercial and industrial areas under all the alternatives.

Development or redevelopment projects may create or replace impervious surfaces, including some pollution-generating impervious surfaces. If runoff from these surfaces enters fish-

bearing streams, contaminants in the runoff may harm or kill fish. Contaminants in runoff that enters surface waters may also be harmful to terrestrial wildlife. Stormwater contaminants that enter Puget Sound and other marine areas are almost immediately diluted to concentrations too low to have any discernible effects on species in that environment.

As discussed in **Section 3.1.2** in **Earth & Water Quality**, on-site stormwater management would likely be required for development or redevelopment projects within the city limits. Implementation of required stormwater management would occur under any of the alternatives and would prevent or minimize the delivery of contaminants to ~~fish-bearing streams~~surface waters. This, in turn, would avoid or minimize the potential for adverse impacts on ~~aquatic species~~ fish, wildlife, and their habitats.

The locations, design, and performance standards of stormwater facility improvements would be determined on a project-by-project basis and cannot be predicted for a programmatic review such as this. For this analysis, it is assumed that the potential for stormwater contaminants to be delivered to streams would be proportional to the amount of area available for conversion to higher-density uses. This assumption is based on the reasoning that a greater amount of area available for redevelopment projects would translate into a greater potential that there may be some projects for which it is not possible to avoid adverse impacts on water quality altogether.

Encouraging residential and commercial development within the urban environment of Seattle could indirectly benefit plants and animals by easing development pressure in less-developed areas outside the city. Tree canopy assessments such as i-Tree show that, compared to urban areas, suburban and rural areas generally have more tree canopy and lower levels of human activity. Development projects in such areas typically entail the conversion of vegetated or minimally disturbed areas to impervious surfaces and areas with elevated levels of human activity. In contrast, most currently undeveloped properties in Seattle are in protected areas (e.g., parks, greenspaces) and are unlikely to be developed during the timeframe of this analysis.

Equity & Climate Vulnerability Considerations

As discussed in **Section 3.3.1**, areas with disadvantaged populations tend to have less canopy cover than other areas. In addition, these areas lost more canopy cover, on average, compared to other neighborhoods, during the 5-year study period of the City's tree canopy assessment. For these reasons, alternatives with a higher likelihood of contributing to canopy cover loss in areas with a combination of disadvantaged populations and low canopy cover would have an elevated risk of adverse effects on disadvantaged populations. Many areas with extensive multifamily development (e.g., apartment complexes) have this combination. Therefore, alternatives that concentrate growth in areas where extensive multifamily development is already present may have a higher likelihood of contributing to canopy cover loss in areas with disadvantaged populations.

Conversely, changes that allow lower-cost housing options in areas that are currently zoned for low-density development could allow more disadvantaged populations to live in areas with

higher canopy cover and access to large parks. Also, with the requirement for street trees to be planted as part of development in Neighborhood Residential zones, new development could result in more tree canopy in public rights-of-way. In contrast to trees on private parcels, the benefits of trees in public rights-of-way are available to more people, including those from disadvantaged populations. Finally, disadvantaged communities would be expected to benefit from policies that prioritize the protection, maintenance, and expansion of tree canopy in residential and mixed-use areas where tree canopy is currently low. These factors would offset some of the potential adverse effects that might arise from concentrating growth in areas where extensive multifamily development is already present.

As discussed in **Section 3.3.1**, trees play a vital role in moderating temperatures in urban areas. 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[19] impacts. Alternatives that concentrate growth in areas where extensive multifamily development is already present may have a higher likelihood of exacerbating climate vulnerability.

Impacts of Alternative 1: No Action

Under Alternative 1, 80,000 new housing units would be added in Seattle by 2044 to meet regionally set growth targets. More than 66,000 (83%) of these would be in areas with high-density designations (e.g., urban centers, urban villages, industrial areas). Several of these areas also have a combination of disadvantaged populations and low canopy cover, including the following:

- **Area 1:** The Aurora Avenue North corridor north of N 85th Street
- **Area 2:** Northgate, Lake City
- None in Area 3
- **Area 4:** Downtown core, South Lake Union
- **Area 5:** Yesler Terrace, Judkins Park
- **Area 6:** Highland Park/White Center
- **Area 7:** South Park
- **Area 8:** North Beacon Hill, Holly Park, Dunlap

Continued redevelopment in these areas could have the effect of reducing tree canopy cover where it is needed most, both in terms of livability and of climate resiliency.

In portions of urban centers and urban villages where the existing canopy cover is relatively high, redevelopment projects may not have substantial adverse effects on livability. However, projects that entail clearing on canopy-rich parcels could impede progress toward the City's canopy cover goal. Currently, few areas with relatively high canopy cover are found in areas designated as urban centers or urban villages; this would likely continue to be the case under Alternative 1.

[19] A heat island is an area that experiences higher temperatures than other areas due to concentrations of buildings, roads, and other infrastructure that absorbs and re-emit the sun's heat more than natural landscapes such as forests and water bodies. The heat island effect can result in daytime temperatures up to 7° Fahrenheit higher than temperatures in outlying areas.

Alternative 1 would result in fewer new housing units than any of the other alternatives. In addition, and in contrast to the action alternatives, Alternative 1 would not reduce the amount of area dedicated to lower-density residential uses~~and it would have the smallest amount of area available for conversion to higher-density uses (**Exhibit 3.3-4**)~~. This would be the case both at the citywide scale and within seven of the eight analysis subareas. The exception is Area 4 (Downtown/South Lake Union), where essentially the same number of housing units would be added under all ~~five~~ six alternatives. For these reasons, the place type-based analysis indicates that Alternative 1 ~~would be expected to result in~~ may have a lower potential for development-related impacts to vegetation (including tree canopy) ~~cover loss~~ than any of the action alternatives, both citywide and in the individual analysis subareas.

Similarly, based on the estimated area that may be affected by residential development projects during the 20-year planning period (**Exhibit 3.3-4**), Alternative 1 would have a lower potential for development-related impacts to vegetation, compared to the action alternatives.

Compared to the action alternatives, Alternative 1 would result in less growth in the city overall but would tend to focus that growth in areas where extensive multifamily development is already present. As a result, Alternative 1 would have a moderate risk of contributing to adverse effects on disadvantaged populations or exacerbating climate vulnerability compared to the action alternatives.

Compared to the action alternatives, Alternative 1 would result in less growth in the city overall but would tend to focus that growth in areas where extensive multifamily development is already present. As a result, Alternative 1 would have a moderate risk of contributing to adverse effects on disadvantaged populations or exacerbating climate vulnerability compared to the action alternatives.

Based on the anticipated amount of area available for conversion to higher-density uses~~likely to be redeveloped~~, Alternative 1 would also have a lower potential of leading to increased delivery of stormwater contaminants to streams, compared to the other alternatives.

130th/145th Station Area

The 130th/145th Station Area does not include any neighborhoods where areas with a high-density designation under Alternative 1 would overlap areas with a combination of disadvantaged populations and low canopy cover. In addition, no areas with relatively high canopy cover are found in areas that would continue to be designated as urban centers or urban villages in the 130th/145th Station Area under Alternative 1.

No areas currently zoned primarily for single-family residential uses in the 130th/145th Station Area would be converted to higher-density designations under Alternative 1. As such, Alternative 1 would have a lower potential of leading to increased delivery of stormwater contaminants to streams in this area, compared to the other alternatives.

Impacts of Alternative 2: Focused

Under Alternative 2, 100,000 new housing units would be added in Seattle by 2044—20,000 more than under Alternative 1. Almost 91,000 of the new housing units would be in areas with high-density designations (regional centers, urban centers, industrial areas, neighborhood centers). As under Alternative 1, several of these areas also have a combination of disadvantaged populations and low canopy cover. Development or redevelopment projects in neighborhood centers established under Alternative 2 could contribute to tree canopy loss in the following areas with a combination of disadvantaged populations and low canopy cover:

- **Area 1:** Greenwood Ave N and N 145th Street
- None in Areas 2, 3, 4, or 5
- **Area 6:** 35th Ave SW and SW Morgan Street, 35th Ave SW and SW Barton Street
- **Area 7:** Georgetown
- **Area 8:** Rainier Ave S and S Graham Street, Beacon Ave S and S Columbian Way (west of Beacon Ave S)

Canopy loss in these areas would be in addition to the canopy loss in the regional centers and urban centers identified in the analysis of Alternative 1. Not all areas with a combination of disadvantaged populations and low canopy cover would experience increased density (and resultant impacts on tree canopy) associated with the establishment of neighborhood centers. Examples include portions of the Licton Springs, High Point, Mid Beacon Hill, and South Beacon Hill neighborhoods.

Development or redevelopment projects in neighborhood centers established under Alternative 2 could also contribute to tree canopy loss in areas with relatively high proportions of existing canopy cover, potentially impeding progress toward the City's canopy cover goal. Such losses may occur in the following neighborhood centers (underlining indicates areas that also have disadvantaged populations):

- **Area 1:** Holman Rd NW and 3rd Ave NW (north of Holman Rd NW), N 56th Street and Keystone Place N
- **Area 2:** 15th Ave NE and NE 145th Street, 8th Ave NE and Roosevelt Way NE, 15th Ave NE and NE 125th Street, Roosevelt Way NE and NE 90th Street, 40th Ave NE and NE 55th Street, 40th Ave NE and NE 55th Street, Princeton Ave NE and Sand Point Way NE, 25th Ave NE and NE 65th Street, 35th Ave NE and NE 75th Street, 35th Ave NE and NE 85th Street, Sand Point Way NE and NE 45th Street
- **Area 3:** 34th Ave W and W Emerson Street, 33rd Ave W and W McGraw Street
- (None in Area 4)
- **Area 5:** 10th Ave E and E Boston Street, 24th Ave E and E Calhoun Street, 29th Ave E and E Madison Street, 42nd Ave E and E Madison Street, 34th Ave and E Union Street
- **Area 6:** Delridge Way SW and SW Dakota Street, Delridge Way SW and SW Brandon Street, Delridge Way SW and SW Orchard Street

- (none in Area 7)
- **Area 8:** Beacon Ave S and S Columbian Way (east of Beacon Ave S)

The amount of land in place types dedicated to relatively high-density residential uses would be ~~Under Alternative 2,~~ about 3,000 acres greater under Alternative 2 than under Alternative 1, indicating a higher potential for development-related impacts to vegetation (including tree canopy) under this alternative. This difference is the smallest ~~of currently lower-density parcels may be converted to higher-density uses (neighborhood centers), the smallest area of conversion~~ among the action alternatives. Growth would be focused in neighborhood centers. ~~Among the action alternatives,~~ This place-type-based analysis indicates that Alternative 2 would ~~thus~~ have ~~the~~ a lower~~st~~ potential for development-related impacts to vegetation (including loss of tree canopy cover) citywide, compared to the other action alternatives.

Similarly, analysis of the estimated area that may be affected by residential development projects during the 20-year planning period (**Exhibit 3.3-4**) also indicates that Alternative 2 would have a lower potential for development-related impacts to vegetation, compared to the other action alternatives.

Many of the neighborhood centers added under Alternative 2 would be near existing centers and villages or include neighborhood business districts, where extensive multifamily development is already present. However, the focused-growth strategy would limit the number of such areas where additional growth would occur. As a result, Alternative 2 would have a ~~relatively~~ higher risk of contributing to adverse effects on disadvantaged populations or exacerbating climate vulnerability than Alternative 3.

Based on the amount of area where development or redevelopment may result in losses of vegetated areas, Alternative 2 would also likely have the lowest potential, among the action alternatives, for short-term and long-term decreases in the diversity and/or abundance of plant and animal communities in areas where development or redevelopment projects occur.

The differences between Alternative 2 and the other action alternatives would not be distributed evenly across all analysis subareas. These differences in distribution are most noticeable when Alternative 2 is compared to Alternatives 3 and 4, all of which would add the same number of new housing units (100,000) in the city. Compared to those two alternatives, Alternative 2 would add 5,000 to 5,500 fewer households in Areas 2, 6, and 8 (combined), and it would add 5,000 to 5,500 more households in the other analysis subareas (combined). Increasing the number of households in any given area would be expected to result in an elevated potential for adverse impacts on plants and animals in that area. As such, compared to Alternatives 3 and 4, Alternative 2 would have a lower risk of adverse effects in Areas 2, 6, and 8, and a higher risk of adverse effects in Areas 1, 3, 5, and 7. Area 4 ~~has~~ would have the same growth in all the alternatives.

The differences in the geographic distribution of potential impacts are not as noticeable in comparison to Alternative 5 and the Preferred Alternative because those ~~A~~alternatives ~~5~~ would add 20,000 more housing units citywide than Alternative 2 would. In all eight analysis

subareas, the risk of adverse effects under Alternative 2 would be less than or ~~essentially equal~~ in between those ~~to that~~ of Alternative 5 and the Preferred Alternative.

Based on the anticipated amount of area available for conversion to higher-density uses~~likely to be redeveloped~~, Alternative 2 would have a lower potential of leading to increased delivery of stormwater contaminants to streams, ~~than~~ compared to the other action alternatives, but it would have a slightly higher potential than Alternative 1.

130th/145th Station Area

None of the Alternative 2 neighborhood centers in the 130th/145th Station Area would overlap areas with a combination of disadvantaged populations and low canopy cover. All three of the neighborhood centers that would be established in the 130th/145th Station Area under Alternative 2 would partially overlap areas with moderately high canopy cover.

Approximately 117 acres in the 130th/145th Station Area (52 acres in the NE 130th Street unit and the full 65-acre area of the NE 145th Street unit) would be designated as neighborhood centers. Current zoning in much of the area that would be redesignated under Alternative 2 encourages high-density uses, such as commercial and multifamily residential. Areas that are currently zoned primarily for single-family residential uses and that would be converted to higher-density designations under Alternative 2 make up approximately one-half of the 117-acre area that would be designated as neighborhood centers. As such, Alternative 2 would have a higher potential than Alternative 1~~,~~ of leading to increased delivery of stormwater contaminants to streams in this ~~A~~area ~~1~~, but a lower potential than the other action alternatives.

Impacts of Alternative 3: Broad

Under Alternative 3, as under Alternative 2, 100,000 new housing units would be added in Seattle by 2044, and the vast majority (more than 89,000) would be in areas with high-density designations (regional centers, urban centers, industrial areas, urban neighborhood areas). Compared to Alternative 1~~2~~, a substantially larger area would be in place types dedicated to relatively high-density residential uses~~of currently lower-density parcels~~—approximately 32,500 acres.~~—~~ This would be a much larger increase than under Alternative 2, and the affected ~~may be converted to higher-density uses in urban neighborhood areas (**Exhibit 3.3-4**). Such~~ parcels would be distributed throughout the city.

This place-type-based analysis indicates that ~~Based on the amount of area where currently low-density parcels may be converted to higher-density uses,~~ Alternative 3 would ~~be expected to~~ have the higher potential for development-related impacts to vegetation citywide ~~loss of tree canopy~~ (and, by extension, a higher potential to impede progress toward the City's canopy cover goal), ~~than~~ compared to Alternatives 2 and 4, and a potential similar to those of Alternative 5 and the Preferred Alternative.

Analysis of the estimated area that may be affected by residential development projects during the 20-year planning period (Exhibit 3.3-4) produces similar results: the total area affected under Alternative 3 (and, as such, the potential for development-related impacts to vegetation) would be greater than under Alternatives 2, 4, and 5, and it would be less than under the Preferred Alternative.

Compared to the other alternatives, Alternative 3 would direct a higher share of housing growth to areas currently dominated by low-density residential development. Such areas would be assigned to the urban neighborhood place type or would be outside areas designated for high-density development. Based on the expectation that tree canopy cover in such areas is greater than in areas where high-density development is already present, Alternative 3 may have a higher potential for vegetation impacts—including loss of tree canopy—compared to the other action alternatives.

While distributing growth throughout the city (particularly in lower-density areas) would ~~affect more~~ result in a comparatively high potential for tree canopy loss~~cover than the other alternatives~~, this approach would also minimize the amount of growth in areas where extensive multifamily development is already present. As a result, compared to the other action alternatives, Alternative 3 would have the lowest risk of contributing to adverse effects on disadvantaged populations or exacerbating climate vulnerability.

Based on the amount of area where development or redevelopment may result in losses of vegetated areas, Alternative 3 would ~~have the second-highest potential (second~~ be similar to Alternative 5 and the Preferred Alternative, ~~) for~~ in terms of the potential for localized short-term and long-term decreases in the diversity and/or abundance of plant and animal communities. As discussed above, Alternative 3 would have a higher risk than Alternative 2 of adverse effects in Areas 2, 6, and 8, and a lower risk of adverse effects in Areas 1, 3, ~~4,~~ 5, and 7.

Based on the anticipated amount of area available for conversion to higher-density uses~~likely to be redeveloped~~, Alternative 3 would have the second-highest potential (second to Alternative 5) for leading to increased delivery of stormwater contaminants to streams.

130th/145th Station Area

Under Alternative 3, a station area plan would not be implemented. Growth would occur based on the citywide place types assigned to the station vicinity. Based on the widespread distribution of areas where currently lower-density parcels may be converted to higher-density uses, the impacts of Alternative 3 the 130th/145th Station Area would be as described for the citywide analysis, above.

Approximately 200 acres of parcels that are currently zoned primarily for single-family residential uses in the 130th/145th Station Area would be converted to higher-density residential designations (i.e., urban neighborhood) under Alternative 3. This includes roughly 20 acres in the NE 145th Street unit and roughly 180 acres in the NE 130th Street unit.

Alternative 3 would thus have the highest potential of leading to increased delivery of stormwater contaminants to streams in this area, compared to the other alternatives.

Impacts of Alternative 4: Corridor

Under Alternative 4, as under Alternatives 2 and 3, 100,000 new housing units would be added in Seattle by 2044; approximately 88,000 of these would be in areas with high-density designations (regional centers, urban centers, industrial areas, corridor areas). Compared to Alternative 1, ~~The area of currently lower-density parcels that may be converted to higher-density uses in corridor areas would be~~ approximately 20,500 more acres would be in place types dedicated to relatively high-density residential uses, representing a greater increase ~~—more~~ than under Alternative 2 ~~(3,000 acres)~~ and ~~less~~ a smaller increase than under Alternative 3 ~~(32,500 acres) (**Exhibit 3.3-4**)~~. This place-type-based analysis indicates that the potential for development-related impacts to vegetation (including loss of tree canopy cover) citywide under Alternative 4 would be intermediate between those of Alternatives 2 and 3.

The distribution of the areas ~~likely to~~ that may experience development-related canopy cover loss would be less focused than under Alternative 2 and less widespread than under Alternative 3. As a result, in areas with relatively high proportions of existing canopy cover, the impacts of Alternative 4 would also likely lie between those of Alternatives 2 and 3. Among the action alternatives, Alternative 4 would thus result in a moderate potential for loss of tree canopy cover.

Analysis of the estimated area that may be affected by residential development projects during the 20-year planning period (**Exhibit 3.3-4**) produces similar results: the total area affected under Alternative 4 (and, as such, the potential for development-related impacts to vegetation citywide) would be greater than under Alternatives 1 and 2, and it would be less than Alternatives 3 and 5 and the Preferred Alternative.

Alternative 4 would emphasize growth in corridors ~~which~~ that include arterial streets where multifamily development is present ~~and~~ as well as in surrounding areas where it is less common. The distribution of these neighborhood residential-corridor areas would be more widespread than the neighborhood centers of Alternative 2. As a result, Alternative 4 would have a higher risk of contributing to adverse effects on disadvantaged populations or exacerbating climate vulnerability than Alternative 3 and a lower risk than Alternative 2.

Based on the amount of area where development or redevelopment may result in losses of vegetated areas, the potential for localized short-term and long-term decreases in the diversity and/or abundance of plant and animal communities under Alternative 4 would be intermediate between those of Alternative 2 and Alternative 3. As discussed in the analysis of Alternative 2, Alternative 4 would have a higher risk than Alternative 2 of adverse effects in Areas 2, 6, and 8, and a lower risk of adverse effects in Areas 1, 3, ~~4,~~ 5, and 7.

Based on the anticipated amount of area available for conversion to higher-density uses~~likely to be redeveloped~~, Alternative 4 would have a higher potential than Alternative 2 of leading to

increased delivery of stormwater contaminants to streams, and a lower potential than Alternative 3.

130th/145th Station Area

Alternative 4 does not include implementation of a station area plan; and the corridor-focused alternative would apply similar place types as for other areas of the city. As described for the citywide analysis above, the impacts of Alternative 4 the 130th/145th Station Area would likely be greater than those anticipated for Alternative 2 and less than those anticipated for Alternative 3.

Similar to Alternative 3, Alternative 4 would convert approximately 200 acres of parcels that are currently zoned primarily for single-family residential uses in the 130th/145th Station Area to higher-density designations. As such, Alternative 4 would be expected to have the same potential as Alternative 3 of leading to increased delivery of stormwater contaminants to streams in this area.

Impacts of Alternative 5: Combined

Alternative 5 would implement a growth strategy that combines elements of the strategies from Alternative 2 (neighborhood centers), Alternative 3 (widespread redevelopment in urban neighborhood), and Alternative 4 (emphasis on redevelopment along major transportation corridors in urban neighborhood areas). Under Alternative 5, 120,000 new housing units would be added in Seattle by 2044—20,000 more than under any of the other action aAlternatives 2 through 4. More than 113,000 (94%) of these would be in areas with high-density designations. Alternative 5 would also include the creation of a new urban center near NE 130th Street and the expansion of the existing urban centers in the Greenwood-Phinney Ridge, Upper Queen Anne, Admiral, West Seattle Junction, Morgan Junction, and Othello areas. As a result, approximately 1,400 more acres more area would fall in the "Centers/high-density residential" category be assigned to high-density place types (rRegional cCenter, u Urban cCenter) under this alternative, compared to the other alternatives (**Exhibit 3.3-4**).

Compared to Alternative 1Under Alternative 5, approximately 33,700 more acres would be in place types dedicated to relatively high-density residential uses—a slightly greater increase than under Alternative 3.of currently lower-density parcels may be converted to higher-density uses—more than under any of the other alternatives (**Exhibit 3.3-4**).[20] These areas would be distributed throughout the city,. As such, all including areas with relatively high proportions of existing tree canopy cover would be likely to experience additional canopy loss. This place-type-based analysis indicates that Alternative 5 would have the higher potential for development-related impacts to vegetation (and, by extension, a higher potential to impede progress toward the City's canopy cover goal), compared to Alternatives 2 and 4, and a potential similar to those of Alternative 3 and the Preferred Alternative.

[20] This value includes approximately 32,300 areas in the "Place types identified for redevelopment" category, plus approximately 1,400 acres where parcels currently zoned for lower-density uses would be converted to urban centers.

Analysis of the estimated area that may be affected by residential development projects during the 20-year planning period (**Exhibit 3.3-4**) produces similar results: the total area affected under Alternative 5 (and, as such, the potential for development-related impacts to vegetation citywide) would be greater than under Alternatives 2 and 4, and it would be less than under Alternative 3 and the Preferred Alternative.

Compared to Alternative 3 and the Preferred Alternative, Alternative 5 would direct less housing growth to areas currently dominated by low-density residential development. As a result, Alternative 5 may have a lower potential for vegetation impacts—including loss of tree canopy—compared to those two alternatives.

~~Even though Alternative 5 would convert more lower-density parcels to higher-density uses, the potential for development-related canopy cover loss would likely be lower than under Alternative 3. This is because Alternative 5 would focus more development in neighborhood centers and corridors, rather than distributing it in urban neighborhoods throughout the city. Development or redevelopment projects in neighborhood centers and corridors would be expected to result in less canopy cover loss than would projects in areas classified as urban neighborhoods. Alternative 5 would thus have a lower likelihood than Alternative 3 of impeding progress toward the City's canopy cover goal, but a higher likelihood than Alternative 2 or Alternative 4.~~

~~Given the highest number of homes produced and the broadest range of areas affected, Alternative 5 would tend to have the highest potential for loss of tree canopy.~~

Because it would add more new housing units citywide—including in areas where extensive multifamily development is already present—~~Based on the citywide distribution of these areas, combined with the greater number of housing units that would be added under this alternative,~~ Alternative 5 ~~c~~would also have a higher risk of changes in canopy cover that contribute to adverse effects on disadvantaged populations or exacerbating climate vulnerability, compared to ~~the other action a~~Alternatives 1 through 4 or the Preferred Alternative.

Based on the amount of area where development or redevelopment may result in losses of vegetated areas, the potential for localized short-term and long-term decreases in the diversity and/or abundance of plant and animal communities under Alternative 5 would be greater than that of Alternative 3. In nearly all analysis subareas, the risk of adverse effects would be higher under Alternative 5 than under ~~any of the other a~~Alternatives 1 through 4. The exceptions would be Areas ~~2,~~ 3, ~~and~~ 4, and 5, where the number of housing units added under Alternative 5 (and, by extension, the potential for localized impacts on plants and animals) would be approximately equivalent to that of Alternative 2.

Based on the anticipated amount of area available for conversion to higher-density uses~~likely to be redeveloped~~, Alternative 5 would have a higher potential of leading to increased delivery of stormwater contaminants to streams, compared to ~~the other a~~Alternatives 1 through 4.

130th/145th Station Area

~~As described for~~ Similar to the citywide analysis ~~above~~, Alternative 5 would have more impacts in the 130th/145th Station Area than ~~any of the other a~~Alternatives 1 through 4. Neither the urban center at NE 130th Street nor the neighborhood center at 15th Ave NE and NE 145th Street would overlap any areas with a combination of disadvantaged populations and low canopy cover. However, both of these areas would partially overlap areas with moderately high canopy cover.

Similar to Alternatives 3 and 4, Alternative 5 would convert approximately 200 acres of parcels that are currently zoned primarily for single-family residential uses to higher-density designations. However, the housing target for these areas would be higher than under any of the other alternatives. As a result, more redevelopment projects would be expected to occur in these areas under Alternative 5 than under ~~the other a~~Alternatives 1 through 4, and Alternative 5 would thus have a higher potential of leading to increased delivery of stormwater contaminants to streams in this area, compared to ~~the other~~ those alternatives.

Impacts of Preferred Alternative

Note: The impacts analysis for the Preferred Alternative was added since the Draft EIS.

Similar in many ways to Alternative 5, the Preferred Alternative would incorporate ideas developed in all of the other alternatives. As with Alternative 5, 120,000 new housing units would be added in Seattle by 2044. The Preferred Alternative includes some refinements to the boundaries of urban centers and urban villages. In addition, one area (in South Park) classified as an urban village or urban center under Alternatives 1 through 5 would instead be a neighborhood center under the Preferred Alternative. Also, a small area of Manufacturing/Industrial land would instead be part of the Georgetown Neighborhood Center.

Compared to Alternative 1, approximately 33,600 more acres would be in place types dedicated to relatively high-density residential uses—an increase similar to that under Alternative 5. These areas would be distributed throughout the city, including areas with relatively high proportions of existing tree canopy cover. This place-type-based analysis indicates that the Preferred Alternative would have the higher potential for development-related impacts to vegetation (and, by extension, a higher potential to impede progress toward the City's canopy cover goal), compared to Alternatives 2 and 4, and a potential similar to those of Alternatives 3 and 5.

Analysis of the estimated area that may be affected by residential development projects during the 20-year planning period (**Exhibit 3.3-4**) produces similar results: the total area affected under the Preferred Alternative (and, as such, the potential for development-related impacts to vegetation citywide) would be greater than under any of the other alternatives.

Compared to Alternative 3, the Preferred Alternative would direct less housing growth to areas currently dominated by low-density residential development. As a result, the Preferred

Alternative may have a lower potential for vegetation impacts than that alternative but a higher potential than the other action alternatives.

In contrast to the other action alternatives, the Preferred Alternative includes proposed zoning. This allows a comparison of the amount of area zoned for different degrees of development density under this alternative and Alternative 1, No Action.

Under Alternative 1, approximately 15,800 acres would be in Neighborhood Residential-zoned areas outside of urban centers, urban villages, and other high-density zones. Under the Preferred Alternative, approximately 1,900 acres (12%) of this area would be zoned for higher-density uses (i.e., regional center, urban center, neighborhood center, frequent transit corridor). The remaining 88% would be zoned as Urban Neighborhood. See **Exhibit 3.3-5**. While Urban Neighborhood-zoned parcels would make up 88% of the lands previously zoned for low-density uses, only about 50% of the housing units anticipated under the Preferred Alternative would be located in these areas. In contrast to the analyses of place type changes and estimated area potentially affected by residential development projects, these findings suggest that, under the Preferred Alternative, a comparatively small number of parcels that currently support low-density residential development would be converted to higher-density uses. This indicates that the Preferred Alternative would have a comparatively low potential for impacts to vegetation, including tree canopy. The Preferred Alternative, like Alternative 5, would add more new housing units than Alternatives 1 through 4—including in areas where extensive multifamily development is already present. However, similar to Alternative 3, a substantial portion of the area potentially affected by residential projects would be in the Neighborhood Residential place type, where existing levels of multifamily development are comparatively low. Based on a comparison of the estimated amount of area affected by residential projects in areas where extensive multifamily development is already present, the Preferred Alternative would have a lower risk than Alternative 5 of contributing to adverse effects on disadvantaged populations or exacerbating climate vulnerability, and a higher risk than Alternatives 1 through 4.

Based on the amount of area where development or redevelopment may result in losses of vegetated areas, the potential for localized short-term and long-term decreases in the diversity and/or abundance of plant and animal communities under the Preferred Alternative would be greater than the other alternatives. Compared to Alternative 5 (under which an equal number of housing units would be added), the Preferred Alternative would add approximately 6,500 more housing units in Areas 1, 3, and 5, resulting in a greater potential for localized impacts on plants and animals in those analysis subareas.

Based on the anticipated amount of area available for conversion to higher-density uses, the Preferred Alternative would have a higher potential of leading to increased delivery of stormwater contaminants to streams, compared to any of the other alternatives.

130th/145th Station Area

Compared to Alternative 5, fewer new housing units would be added in this area, indicating that the Preferred Alternative would have a lower potential for impacts to vegetation. As with Alternative 5, neither the urban center at NE 130th Street nor the neighborhood center at 15th Ave NE and NE 145th Street would overlap any areas with a combination of disadvantaged populations and low canopy cover. However, both of these areas would partially overlap areas with moderately high canopy cover.

Similar to Alternative 5, the Preferred Alternative would convert approximately 200 acres of parcels that are currently zoned primarily for single-family residential uses to higher-density designations. As a result, the Preferred Alternative's potential for leading to increased delivery of stormwater contaminants to streams in this area would be similar to that of Alternative 5.

3.3.3 Mitigation Measures

Incorporated Plan Features

The action alternatives amend the Comprehensive Plan to address a new climate element including climate resilience strategies that include reducing heat islands and increasing tree canopy. ~~In addition,~~ In addition, the action alternatives include policies to maintain and enhance tree canopy. Examples of plan polices that would contribute to achieving the City's goal of at least 30% tree canopy cover include the following:

Policies that directly address tree canopy:

- LU 2.7: Encourage the preservation and expansion of the tree canopy throughout the city for the aesthetic, health, and environmental benefits trees provide, considering first the residential and mixed-use areas with the least tree canopy in order to more equitably distribute the benefits to residents.
- CE 12.3: Regularly update the tree canopy analysis to monitor changes and trends in the amount, distribution, and condition of the urban forest and use this information to shape urban forestry management plans, decisions, and actions.
- CE 12.6: Preserve, restore, maintain, and enhance tree canopy on City property and rights-of-way.
- CE 12.8: 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.

Other policies that likely to contribute to the protection and maintenance of tree canopy:

- CE 9.3: Expand tree canopy and greenspace, especially in communities that experience disproportionate impacts of extreme heat and smoke events.

- P 1.17: Maintain and expand cooperative agreements with Seattle Public Schools and other public or private agencies to provide or expand access to open spaces they control and increase the tree canopy and green space they provide.
- P 5.1: Protect, restore, and expand urban forests and tree canopy on City-owned land, including rights-of-way, prioritizing frontline communities.
- T 4.10: Enhance the public street tree canopy and landscaping in the street right-of-way.

Maximizing tree canopy cover—particularly in areas with disadvantaged populations—would support the City's goal of developing a growth strategy that results in more equitable outcomes and reduces harm. By reducing the urban heat island effect, tree canopy cover enhances climate resiliency.

Diagrams in **Section 3.6 Land Use Patterns & Urban Form** and supporting appendices provide examples of how housing goals can be met while providing adequate space for preserved trees.

Regulations & Commitments

Under any of the alternatives, development projects would be designed and built in accordance with applicable federal, state, and local statutes and regulations (**Exhibit 3.3-7**). Many of these involve review and permitting processes to ensure impacts to the environment (including environmentally critical areas important to plants and animals) are avoided, minimized, documented, and mitigated ~~to the greatest extent possible~~. The procedures associated with these regulations also create opportunities for public notice and comment on projects before implementation. Regulations and commitments that address stormwater runoff are identified in **Section 3.1.3** in **Earth & Water Quality**.

Exhibit 3.3-7. Federal, State, and Local Regulations, Permits, and Processes Related to the Protection of Plants and Animals

Authority	Agencies with Jurisdiction	Requirements
Federal		
Migratory Bird Treaty Act	U.S. Fish and Wildlife Service (USFWS)	Prohibits the taking, killing, or possession of migratory birds or any parts, nests, or eggs of such birds, except as authorized by USFWS.
Bald and Golden Eagle Protection Act	USFWS	Prohibits the taking (including disturbance) of eagles or their nests, except as authorized by USFWS.
Clean Water Act Section 404	U.S. Army Corps of Engineers	Requires authorization for excavating, land clearing, or discharging dredged or fill material into waters of the United States, including wetlands.
Marine Mammal Protection Act	National Marine Fisheries Service (NMFS)	Prohibits injury or harm (including disturbance) to marine mammals, except as authorized by NMFS.
Endangered Species Act Section 7 Consultation	NMFS and/or USFWS	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

Authority	Agencies with Jurisdiction	Requirements
		species or result in the destruction or adverse modification of critical habitat for those species.
Magnuson-Stevens Fishery Management and Conservation Act Consultation	NMFS	Requires a federal agency to consult with NMFS on a proposed activity authorized, funded, or undertaken by the agency, if the activity may adversely affect essential fish habitat (EFH) for federally managed commercially harvestable fish.
Washington State		
State Environmental Policy Act	Various	Requires state and local agencies to review proposals and identify environmental impacts; permits and approvals can be conditioned or denied, to mitigate or avoid the impacts identified through SEPA review.
State Hydraulic Code	Washington Department of Fish and Wildlife (WDFW)	Regulates activities that use, divert, obstruct, or change the natural flow or bed of waters (marine or fresh); project proponents must obtain a Hydraulic Project Approval, which ensures the work is done in a manner that protects fish life.
Clean Water Act Section 401	Washington State Department of Ecology	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.
City of Seattle		
Environmentally Critical Areas Ordinance	City of Seattle Department of Construction & Inspections (SDCI)	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	SDCI	Regulates activities in and near major water bodies (e.g., rivers, large lakes, marine waters), establishes requirements for maintaining native vegetation.
Tree Protection Ordinance	SDCI	Limits the number, size, and type of trees that may be removed from private property and establishes requirements for replacing trees that are cut down.
City of Seattle SEPA Plants and Animals Policy	SDCI	Allows DPD to grant, condition, or deny construction and use permit applications for public or private proposals subject to SEPA review, with the goal of minimizing or preventing loss of wildlife habitat.
Land Use Regulations	SDCI	Specifies Green Factor requirements and street tree requirements for development in the Multifamily and Commercial zones and establishes tree requirements for development in Neighborhood Residential zones.

Source: Parametrix, 2023.

In March 2023, Mayor Harrell issued an Executive Order that addresses trees on City-owned property, identifying six measures for increasing the city's urban tree canopy:

- Create a One Seattle Tree Fund, collected from fee-in-lieu payments from developers and private property owners. The fund will target new tree plantings in areas with low canopy

cover, specifically historically underserved communities, along with parks and publicly owned rights-of-way.

- Expand public-private partnerships to support new, innovative funding mechanisms to maintain and expand urban forest on public lands and in publicly owned rights-of-way.
- Replace every healthy, site-appropriate tree removed from City-owned property within city limits with a minimum of three trees; replace every tree on City-owned property within city limits that has died or is otherwise hazardous or invasive with a minimum of two trees.
- Remediate unhealthy trees and trees creating conflicts.
- Steward City-managed forested watersheds outside of urban areas for the long-term provision of ecosystem services to the communities we serve, based on principles of diversity, equity, and inclusion and best available scientific knowledge.
- Report on urban area tree canopy expansion and protection progress through the annual Urban Forestry Progress Report.

Also, in May 2023, the Seattle City Council passed an ordinance that updates the existing Tree Protection Code and addresses urban forest on private property. The ordinance includes the following actions:

- Lower the size thresholds and provide stronger protections for trees subject to regulation.
- Increase planting requirements.
- Fund tree planting programs and address the lack of trees in historically underserved communities through establishment of a payment-in-lieu program to provide flexibility for homebuilders.
- Provide for development standard modifications through incentives to help avoid impacts to trees when possible.
- Create clear standards for tree protection during the review process.
- Expedite the permitting process.
- Establish a more simple and clear naming convention for tree categories.
- Restrict removal of heritage trees.
- Require the planting of street trees in urban neighborhood zones on parcels that are redeveloped.

Taken together, these policies and regulations are expected to minimize the potential for tree canopy loss in several ways. Enhanced restrictions on tree removal will reduce related canopy loss on private parcels, and tree replacement requirements will ensure that a substantial portion such losses are reversed over time. Moreover, requirements for tree planting in road rights-of-way may create opportunities for additional tree canopy development in areas that currently lack street trees.

The potential for canopy losses to affect disadvantaged populations will be reduced through the payment-in-lieu program. Revenue generated through that program will be used to plant and maintain new trees with a priority in census tracts with tree canopy cover of 25 percent or less

and on planting in public places. Given that areas with disadvantaged populations tend to have less canopy cover than other areas, the emphasis on planting in areas with low canopy cover will generate benefits for those populations.

Tree planting through the payment-in-lieu program may also provide some ecological and social benefits that would not be realized through on-site tree replacement. The program will allow the City to identify sites where restoration or creation of forest canopy will generate public benefits. For example, it will be possible to plant and maintain stands of trees in public places. Trees growing in groups or stands provide shade and habitat more effectively than single, isolated trees. In addition, when trees are planted in public places, benefits related to physical and mental health are more widely available. Moreover, the commitment of public resources to maintaining planted trees increases the likelihood of long-term survival. Such planning and coordination is not possible when individual trees are replaced on private parcels. By creating the opportunity for coordinated and consolidated planting and maintenance of trees, the payment-in-lieu program opens the door to strategic efforts that maximize the public benefits of trees.

Finally, the City was recently awarded $12.9 million in grant funding, to restore forested places near schools, parks, and low-income housing. The projects implemented through this funding will be designed to offset the effects of climate change, improve access to nature, and support green careers for young people.

Other Potential Mitigation Measures

Measures that may increase and enhance tree canopy cover include the following:

- Add an amenity area requirement in Neighborhood Zones, encouraging space for trees. (As of ~~Spring~~ early 2025~~4~~, the City anticipates adopting new zoning standards in Neighborhood Residential zones to allow for middle housing types).
- Utilize an adaptive management policy to collect, monitor, analyze, and learn from the results of code application and to assess the Tree Protection Code's effectiveness in achieving the goals of retaining or replanting trees and increasing canopy cover while allowing for more housing options. This policy fits with the City's goal of conducting citywide tree cover assessments every 5 years, which can inform adaptive management.
- Encourage attached units rather than detached units, which could result in more plantable area by eliminating small corridors between buildings. This option may be feasible in areas that would be classified as neighborhood center, urban neighborhood, or corridor under the action alternatives.
- Increase funding for City-led tree planting and maintenance in parks and rights-of-way, particularly in areas identified as heat islands.
- Expand existing programs such as Trees for Neighborhoods, which provides trees and support for people who want to plant trees on their property or in the adjacent right-of-way.

- Develop a comprehensive plan for investment in the equitable distribution and resilience of the urban forest.
- Investigate technologies such as flexible pavement, soil cells, expanded tree pits, and appropriate soil types in City-owned rights-of-way.
- Pursue creative approaches for maximizing green infrastructure in appropriate locations in City-owned rights-of-way—for example, installing planted bike lane and curb line buffer strips between curbs and sidewalks, or replacing parking spots and curb bulbs to support park-scale street trees.
- Collaborate with Seattle Public Schools and organizations such as Green Schoolyards America to increase tree cover on school grounds.

Potential measures for avoiding, minimizing, and mitigating development-related impacts on water quality are identified in **Section 3.1.3** in **Earth & Water Quality.** Possible additional measures for reducing the risk of delivering contaminants to ~~fish-bearing streams~~ surface waters include the following:

- Retrofit existing stormwater facilities to increase storage capacity and improve water quality treatment.
- Adopt stormwater detention standards that require new parcel development to detain larger volumes of stormwater runoff on-site and in a manner that mimics predeveloped stormwater patterns.
- Set lower development size thresholds to require more parcel projects to install on-site stormwater management.
- Set lower limits for the maximum percentage of a new development that could be covered with impervious surfaces.
- Encourage expanded use of soil amendments to facilitate stormwater infiltration (i.e., low-impact development practices) where technically feasible.
- Sponsor or encourage public education about the threats posed to fish by contaminants in stormwater runoff.
- Provide a stronger program for maintaining stormwater treatment and detention facilities.

3.3.4 Significant Unavoidable Adverse Impacts

Under any of the alternatives, population growth in Seattle will drive development and redevelopment of residential and commercial properties. As discussed above, 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 in or near Seattle. Based on this consideration, combined with the existing statutory and regulatory requirements that provide protection for plants and animals, none of the alternatives would be expected to result in impacts that would reduce the likelihood that populations of native plant or animal species would persist in or near Seattle~~of survival or recovery of a plant or animal species in the wild~~.

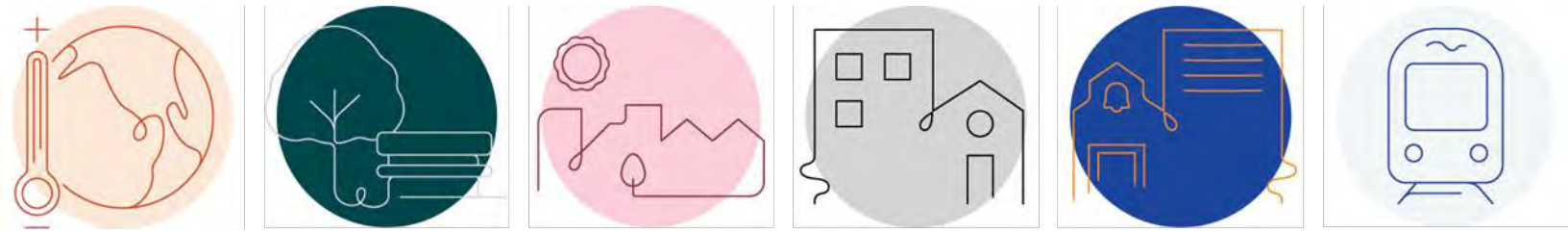
Similarly, none of the action alternatives would be expected to have significant, unavoidable adverse impacts on aquatic species and habitats. On-site stormwater management would likely be required for development or redevelopment projects within the city limits (see **Section 3.1.4** in **Earth & Water Quality**). Implementation of required stormwater management would occur under any of the alternatives. For these reasons, none of the action alternatives would be expected to result in an appreciable increase (compared to the No Action alternative) in the delivery of stormwater contaminants to ~~fish-bearing streams~~surface waters. This, in turn, would avoid or minimize the potential for adverse impacts on fish, wildlife, and their habitats.

Also, none of the action alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover. As discussed in **Section 3.3.3**, 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. In addition, the potential for canopy loss due to other factors would be the same under all alternatives.

Finally, as discussed in the analysis of impacts common to all alternatives, encouraging residential and commercial development within the urban environment of Seattle could indirectly benefit tree canopy cover regionally by easing development pressure in less-developed areas outside the city. Increasing density in the city—particularly given the City's requirements for tree protection and replacement—would have fewer adverse impacts than would the conversion of undeveloped parcels in suburban areas to low-density residential uses.

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3.4 Energy & Natural Resources





Source: City of Seattle, 2023.

This section addresses the affected environment, impacts to the environment, mitigation measures, and significant unavoidable adverse impacts related to energy and other natural resources for the One Seattle Comprehensive Plan Update.

Thresholds of significance utilized in this impact analysis include:

- Energy usage in excess of projected supply availability.
- Conflict with energy policies adopted by the City of Seattle.

3.4.1 Affected Environment

This section characterizes the affected environment with respect to energy and natural resources for the City of Seattle, beginning with a summary of the major regulations relating to energy and a review of existing energy resources.

Current Policy & Regulatory Framework

Federal

National Energy Conservation Policy Act

The National Energy Conservation Policy Act serves as the underlying authority for federal energy management goals and requirements. Signed into law in 1975, it has been regularly updated and amended by subsequent laws and regulations. Pursuant to the Act, the National Highway Traffic Safety Administration is responsible for establishing additional vehicle standards. In 2012, new fuel economy standards for passenger cars and light trucks were approved for model years 2017 through 2021 (77 Federal Register [FR] §§62624–63200). Fuel economy is determined based on each manufacturer's average fuel economy for the fleet of vehicles available for sale in the United States.

Energy Policy Act of 2005

The Energy Policy Act of 2005 seeks to reduce reliance on non-renewable energy resources and provide incentives to reduce current demand on these resources. For example, under this Act, consumers and businesses can obtain federal tax credits for purchasing fuel-efficient appliances and products, including buying hybrid vehicles, building energy-efficient buildings, and improving the energy efficiency of commercial buildings. Additionally, tax credits are available for the installation of qualified fuel cells, stationary microturbine power plants, and solar power equipment.

Regional Plans & Regulations

The Pacific Northwest Electric Power Planning and Conservation Act (Northwest Power Act) (16 U.S. Code [U.S.C.] Chapter 12H; Public Law No. 96-501) was passed in 1980 and amended in 1996-97. The intent of the law is to promote and support:

- Conservation and efficiency in the use of electrical power
- Development of renewable resources within the Pacific Northwest
- Adequate, efficient, economical, and reliable power supplies for the region
- Orderly planning for regional power systems
- Development of regional plans and programs related to energy conservation, renewable resources; and protection, mitigation, and enhancement of fish and wildlife resources

This law includes specific requirements for utilities to undertake energy conservation programs, pay for mitigation of impacts caused by power transmission and distribution, and develop renewable resources as part of their overall resource mix. It also established the Northwest Power Planning Council (NPPC) as the regional planning agency for Idaho, Montana, Oregon, and Washington. The NPPC goals, as defined by the Northwest Power Act, are to work cooperatively with the states to manage the hydroelectric generating capacity and natural resources of the Columbia River Basin as well as other regional energy systems.

The NPPC's energy planning for the region is guided by the *Northwest Conservation and Electric Power Plan*, now in its eighth revision, which was updated in 2021 (NPCC, 2022). The plan includes detailed recommendations and strategies for furthering already active conservation programs by state and local governments, for ensuring research and development (as well as implementation and funding) of renewable energy resources, and for protecting the environment from impacts associated with electric power generation.

State Regulations

The Washington State Energy Code (Chapter 19.27A RCW) was adopted in 1990. Its intent was to establish building standards that bring about the common use of energy-efficient building methods and to assure that such methods remain economically feasible and affordable. In 2009, the State Legislature adopted the Climate Pollution Reduction and Energy Efficiency Act which requires the adoption of state energy codes that incrementally move towards achieving the seventy percent reduction from a 2006 baseline in annual net energy consumption for buildings by 2031.

The energy code is designed to require new buildings to meet a specified level of energy efficiency while allowing flexibility in building design, construction, and heating equipment efficiencies within that framework. As required by state law, each update is designed to impose more stringent standards to reduce energy consumption in buildings. ~~The standards of the energy code primarily dictate requirements for building insulation and in a 2022 update, now include the use of all-electric space and water heating in new commercial and multifamily construction.~~The 2021 Washington State Energy Code went into effect in 2024.

Washington State Clean Buildings Performance Standard (CBPS): The legislature passed clean building laws in 2019 (HB 1257) and 2022 (SB 5722) to create an energy performance standard for non-residential buildings larger than 50,000 square feet and require energy management planning, operations and maintenance and tracking energy use over time for non-residential buildings larger than 20,000 square feet and multifamily buildings over 50,000 square feet.

Local Regulations & Policies

City of Seattle Energy Code

Seattle's building and energy codes include energy-efficiency standards for residential and nonresidential buildings. ~~Similar to~~Closely modeled on state regulations, these standards also dictate requirements for the building ~~insulation~~ envelope, Heating, Ventilation and Air Conditioning (HVAC) systems, water heating, lighting, and metering.~~and fuel efficiency for heat sources.~~ Under state law, all local jurisdictions must adopt the requirements of the Washington State Energy Code for residential buildings but may impose ~~, although the code allows for local standards to prevail if they are more restrictive than the state standards~~more stringent standards for nonresidential buildings.

The 2021 ~~update to the 2018~~ Seattle ~~Building~~ Energy Code ~~is effective beginning~~went into effect ~~July 1~~November 15, ~~2023~~2024. The 2021 update largely matches the 2021 Washington State Energy Code, including adoption of the new "fossil fuel compliance path." Some updates to the nonresidential Energy Code provide greater efficiency than both the 2018 Seattle Energy Code and the 2021 Washington State Energy code. Other updates provide greater flexibility for existing buildings.~~Updates apply to commercial and large multifamily buildings (4+ stories) and include the elimination of gas and most electric resistance space heating systems, eliminates gas water heating in large multifamily buildings and hotels, improves building exteriors to improve energy efficiency and comfort, creates more opportunity for solar power, and requires electrical infrastructure necessary for future conversion of any gas appliances in multifamily buildings (City of Seattle, 2021).~~

Seattle Climate Action Plan

The 2013 Seattle Climate Action plan laid groundwork for buildings emissions targets for 2030 (City of Seattle, 2013). This included target distinctions between building types. Commercial buildings have a goal of 45% reduction in CO_2e emissions and a 10% reduction in energy use by 2030 as compared to 2008 baseline emissions. Residential buildings have similar goals, with a 32% reduction in CO_2e and 20% reduction in energy use by 2030. For both combined commercial and residential, greenhouse gas intensity, measured in $MTCO_2e$ per British Thermal Unit (BTU) have a reduction target of 25% by 2030. For multifamily residential and commercial buildings, there is also the target for 50% of permitted new construction projects achieve one of the following green building standards by 2025: Living Building Challenge, Built Green, LEED, Evergreen Sustainable Development Standard, or Passive House.

The 2018 updated climate action strategy offered additional measures, such as the goal of buildings to be carbon neutral by 2050 (City of Seattle, 2018). The Seattle City Council also enacted the Green New Deal Resolution which calls for a Seattle free of climate pollutants by 2030 (City of Seattle, 2022). See **Section 3.2 Air Quality & GHG Emissions** for more detail.

Building Tune-Ups

A key piece of the Seattle Climate Action Plan is the Tune-Ups legislation (Seattle Municipal Code 22.930), adopted March 2016. Through building tune-ups, energy and water performance can be optimized by identifying low- or no-cost actions related to building operations and maintenance. Examples of operation tune-ups to an existing building include changes to thermostat set points or adjusting lighting or irrigation schedules. Tune-ups also review HVAC, lighting, and water systems to identify needed maintenance, cleaning, or repairs. On average, building tune-ups can generate 10 to 15% savings in energy costs (City of Seattle, 2023). Tune-ups are required every five years for commercial buildings 50,000 square feet or larger.

Building Emissions Performance Standards

Existing buildings over 20,000 square feet must meet building performance standards (BPS) over time to improve energy efficiency and reduce climate impacts. Seattle has recently enacted legislation to create a Building Emissions Performance Standard (BEPS)for existing commercial and multifamily buildings larger than 20,000 square feet (City of Seattle, 2023). This Building Emissions Performance Standard (BEPS) includes standard greenhouse gas intensity targets (GHGITs) for different building activity types (e.g., office, retail, multifamily) for each compliance interval until net-zero emissions targets in 2050 (City of Seattle, 2023). The BEPS sets required GHGITs through 2035 and provisional targets from 2036-2050 to enable owners to plan, while allowing the later targets to be revised, if needed, by future rules updates.

Energy Benchmarking

Buildings account for more than one third of Seattle's core greenhouse gas emissions (City of Seattle, 2023). Owners of non-residential and multifamily buildings (20,000 square feet or larger) are required to track energy performance and report annually to the City of Seattle pursuant to Seattle's Energy Benchmarking Law (Seattle Municipal Code 22.920). Through this tracking and reporting program, inefficiencies and opportunities to reduce energy waste and emissions are highlighted. Other benefits of benchmarking include:

- Shows how buildings are used—and wasting—energy.
- Helps businesses and consumers make more informed decisions that take energy costs into account when buying or renting property.
- Lowers energy costs, reduces greenhouse gas impacts, and creating jobs in the energy services and construction trades.
- Establishes energy performance ranges for Seattle building types based on their reported energy use.

- Allows the City of Seattle to track its energy reduction goals and target incentive dollars by market sector.

Regional Availability of Energy

Transportation Energy

Refined petroleum products such as gasoline and diesel are used primarily for transportation purposes. Approximately 54% of petroleum resources delivered to the State of Washington refineries are from domestic crude oil (primarily Alaska) and approximately 30% is imported from Canada with Canadian supplies making up for declines in supply from Alaska (Washington Department of Commerce, 2013). The production and pricing of petroleum products is driven by global demand and consumption. Unpredictable events such as the state of the global financial system, political turmoil, and refinery and pipeline accidents can affect production and pricing.

Seattle City Light

Seattle City Light (SCL) is one of the nation's largest municipally owned utilities serving more than 420,000 homes and 49,000 businesses throughout Seattle, Shoreline, Lake Forest Park, Burien, Renton, Tukwila, SeaTac, Normandy Park, and Unincorporated King County (Seattle City Light, 2023a).

SCL owns seven hydroelectric facilities in Washington and delivers electricity through a network of approximately 2,330 miles of distribution circuit and 16 major substations (Seattle City Light, 2023b). Power resources consist of 90% hydropower with approximately half of which is supplied by facilities owned by Seattle City Light. The remaining is purchased from the Bonneville Power Administration (BPA) (Seattle City Light, 2022). The Integrated Resource Plan (IRP) anticipates baseline load forecasts for the next 10 years to be an increase of approximately 0.5% per year. A rapid electrification scenario was considered, based on the Electric Power Research Institute's 2022 Electrification Assessment, which has the load increase by 32% compared to the baseline scenario. To account for this, a top portfolio plan of new resource additions was created. Long term demand during summer peaks when hydroelectric resources run low is met through solar energy from eastern Washington and Oregon.

The 2022 IRP also outlines the need to pursue acquisition of additional resources such as local commercial or community solar projects that will diversify sources of weather-dependent generation and transmission uncertainty, offshore and Montana wind in the 2030s with winter peaking generation profiles to help meet expected increases in seasonal demand and demand response programs, which will help the utility manage short-term peaks in electricity demand.

Anticipated increases in winter peak demands due to electrification (reduced use of natural gas for heating) combined with an increasing frequency of weather extremes associated with climate

change additional resources such as batteries, hydrogen, geothermal, small modular/advanced nuclear, etc., could be considered to maintain current levels of grid reliability.

Puget Sound Energy

Puget Sound Energy (PSE) is Washington state's oldest local energy company and serves approximately 900,000 natural gas customers in 6 counties (PSE, 2023b). These include parts of King (not Enumclaw), Kittitas (not Ellensburg), Lewis, Pierce, Snohomish, and Thurston counties.

PSE controls its gas-supply costs by acquiring gas, under contract, from a variety of gas producers and suppliers across the western United States and Canada. About half the gas is obtained from producers and marketers in British Columbia and Alberta, and the rest comes from Rocky Mountain states. Once PSE takes possession of the gas, it is distributed to customers through more than 26,000 miles of gas mains and service lines (PSE, 2023a).

Energy Usage

Building Energy

Energy usage is typically quantified using Btu. Development within the City of Seattle under all alternatives will primarily be comprised of commercial, industrial, and residential. Energy consumption of these land use types is by the energy use intensity (EUI), which is defined as a building's energy use as a function of its size or other characteristics and is measured by thousand Btu per square foot (kBtu/sf). The lower the EUI, the better the energy performance of a building. As discussed above, owners of non-residential and multifamily buildings (20,000 square feet or larger) are required to track energy performance and report annually to the City of Seattle pursuant to Seattle's Energy Benchmarking Law (Seattle Municipal Code 22.920). **Exhibit 3.4-1** lists the average~~median~~ EUI by land use type based on 202~~0~~3 benchmarking data.

Exhibit 3.4-1. Energy Usage by Land Use, Excluding Single Family

Land Use Type	Building EUI (kBTU/sf)
~~Laboratory~~	~~197.2~~
~~Hospital~~	~~191.8~~
~~Supermarket/Grocery Store~~	~~183.6~~
~~Restaurant~~	~~150.8~~
~~Medical Office~~	~~73.9~~
~~College/University~~	~~73.4~~
~~Other~~	~~62.7~~
~~Mixed Use Property~~	~~56.3~~
~~Hotel~~	~~48.7~~
~~High-Rise Multifamily~~	~~44.6~~

Land Use Type	Building EUI (kBTU/sf)
~~Large Office~~	~~43.2~~
~~Retail Store~~	~~43.2~~
~~Small- and Mid-Sized Office~~	~~42~~
~~Refrigerated Warehouse~~	~~37.8~~
~~Residence Hall/Dormitory~~	~~35.7~~
~~Mid-Rise Multifamily~~	~~33.1~~
~~K-12 School~~	~~32.9~~
~~Low-Rise Multifamily~~	~~29.8~~
~~Worship Facility~~	~~29.8~~
~~Non-Refrigerated Warehouse~~	~~29.2~~
~~Distribution Center~~	~~24.5~~
~~Self-Storage Facility~~	~~11.8~~
Data Center	780.5
Supermarket/Grocery Store	230.7
Restaurant	205.3
Laboratory	203.2
Urgent Care/Clinic/Other Outpatient	194.5
Hospital	177.0
Mixed Use Property	116.0
Medical Office	109.3
Wholesale Club/Supercenter	101.3
College/University	86.9
Strip Mall	81.8
Enclosed Mall	79.2
Office	75.9
Hotel	75.0
Library	69.3
Manufacturing/Industrial Plant	67.5
K-12 School	55.3
Distribution Center	51.9
Residence Hall/Dormitory	49.5
Multifamily Housing	44.9
Refrigerated Warehouse	44.8
Worship Facility	36.1
Non-Refrigerated Warehouse	35.9
Self-Storage Facility	18.9

Source: City of Seattle, 2023~~0~~.

Total energy usage in Washington was 1,571.4~~779.4~~ trillion Btu in 202~~0~~2 (U.S. EIA, 2024~~20~~). Electricity and natural gas in Washington are generally consumed by stationary users such as residences, commercial, and industrial facilities, whereas petroleum consumption is generally accounted for by transportation-related energy use. The electricity and natural gas consumption attributable to the State is provided by the U.S. Energy Information Administration (U.S. EIA) data. In the year 202~~0~~2, Washington State consumed approximately ~~1,779~~310 trillion btu of electricity (U.S. EIA, 2024~~0a~~) and approximately 351~~39~~ trillion btu of natural gas (U.S. EIA, 2024~~3~~).

Automotive Fuel

Automotive fuel consumption for all on-road transportation in the State of Washington provided by the U.S. Energy Information Administration (U.S. EIA) data. According to the U.S. EIA, the State of Washington consumed approximately 258.2 trillion Btu of motor gasoline, 150 trillion Btu of diesel, 0.1 trillion Btu of natural gas (for motor fuel), and 20.3 trillion Btu of fuel ethanol in 2020 (U.S. EIA, 2020a and U.S. EIA, 2023).

Federal programs are mandating improved fuel economy for passenger cars and light trucks. Transportation-related emissions in 2044 would be lower as compared to existing conditions due to improvements in fuel economy. The National Highway Traffic and Safety Administration (NHTSA) is responsible for establishing vehicle standards and for revising existing standards. Compliance with Federal fuel economy standards is not determined for each individual vehicle model. Rather, compliance is determined based on each manufacturer's average fuel economy for the portion of their vehicles produced for sale in the United States. On March 31, 2022, the NHTSA finalized their Corporate Average Fuel Economy (CAFÉ) standards for model years 2024 to 2026. The final rule requires an industry-wide fuel average of approximately 49 miles per gallon (mpg) for passenger cars and light trucks in model year 2026 by increasing fuel efficiency by 8% annually for model years 2024 and 2025 and 10% for model year 2026 (NHTSA, 2023).

Washington State adopted a new rule in December 2022 that requires new ZEV sales of passenger cars, light-duty trucks, and medium-duty vehicles to 100% starting in 2035. ZEVs do not require diesel, gasoline, natural gas, or ethanol. Progress toward 100% ZEV sales in 2035 would increase the rate of registration of ZEVs in Seattle, resulting in reduced automotive fuel consumption and the need for charging infrastructure.

3.4.2 Impacts

Impacts Common to All Alternatives

Construction Impacts

Future growth under any alternative would result in development of new residential, retail, light industrial, office, and commercial use. Construction of future development within the City would result in the consumption of energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials, such as asphalt, steel, concrete, pipes, and manufactured or processed materials such as lumber and glass.

Fossil fuels for construction vehicles and other energy-consuming equipment would be used. Fuel energy consumed during construction would be temporary in nature and would not represent a significant demand on energy resources. Some incidental energy conservation would occur during construction through compliance with engine emissions standards implemented by the United States Environmental Protection Agency (EPA).

Substantial reductions in energy inputs for construction materials can be achieved by selecting building materials composed of recycled materials that require substantially less energy to produce than non-recycled materials. The incremental increase in the use of energy bound in construction materials would not substantially increase demand for energy compared to overall local and regional demand for construction materials. It is reasonable to assume that production of building materials would employ all reasonable energy conservation practices in the interest of minimizing the cost of doing business.

Operational Impacts

Transportation Energy Demand

As discussed in **Section 3.2 Air Quality & GHG Emissions**, mobile emissions were estimated using the EPA's Motor Vehicle Emission Simulator (MOVES) model. The MOVES model defaults include assumptions for vehicle fuel type including gasoline, diesel, compressed natural gas (CNG), and ethanol. Projected vehicle miles traveled (VMT) by passenger vehicles, trucks, and buses were used to estimate annual transportation energy usage.

A mix of land uses is associated with reduced VMT (WSDOT, 2013). Diversity in land uses combined with increased density within an urban area can lead to shorter trip distances and greater use of walking, as well as the reduced need for vehicle ownership. Accessibility to a variety of trip purposes, as in mixed use developments, may induce additional trips; however, these trips are shorter and are more likely to be made by walking than trips in areas where mixed land uses are not available. Travel demand models include findings about projected VMT in future years for various classes of vehicles (e.g., cars, trucks, buses). The model generally

assumes continuation of current economic and demographic trends, with minor shifts toward shorter trips and more trips made by modes other than automobile travel. Improvements in fuel efficiency combined with reductions in VMT would contribute to reductions in transportation fuel demand on a per capita basis.

Exhibit 3.4-2 summarizes VMT associated with each alternative. See **Exhibit 3.4-3** for a comparison of annual fuel usage for existing, Alternative 1, Alternative 2, Alternative 3, ~~and~~ Alternative 5, and the Preferred Alternative in units of trillion British Thermal Units (Btu). The difference between Existing and Alternative 1 (No Action) is the increase in annual vehicle miles traveled over the 20-year planning horizon.

Exhibit 3.4-2. Annual Vehicle Miles Traveled by Alternative

	Existing	Alt. 1	Alt. 2	Alt. 3	Alt. 4*	Alt. 5	Preferred
Cars	20,332,000	22,213,000	22,532,000	22,382,000	22,532,000	22,920,000	22,969,000
Trucks	1,871,300	2,144,100	2,166,900	2,211,100	2,166,900	2,202,100	2,247,800
Buses	68,930	77,150	77,140	77,140	77,140	77,140	77,140
Total VMT**	**22,272,230**	**24,434,250**	**24,776,040**	**24,670,240**	**24,776,040**	**25,199,240**	**25,293,940**

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
* 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.
VMT in **Section 1.6.10 and **Section 3.10 Transportation** excludes buses.
Source: Fehr & Peers, 2024~~3~~.

Exhibit 3.4-3. Annual Transportation Fuel Usage (Trillion Btu)

	Existing	Alt. 1	Alt. 2	Alt. 3	Alt. 4*	Alt. 5	Preferred**
Gasoline	0.3471	0.34	0.35	0.35	0.35	0.36	0.36
Diesel	0.0141	0.02	0.02	0.02	0.02	0.02	0.02
CNG	0.0001	0.0002	0.0002	0.0002	0.0002	0.0002	0.0002
Ethanol	0.0006	0.0006	0.0006	0.0006	0.0006	0.0007	0.0007

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
* 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.
** Growth 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 fuel usage estimates have been estimated by increasing Alternative 5 fuel usage by 0.38%.
Source: Kimley-Horn, 2024~~3~~.

Building Energy Demand

Increases in development would increase population and employment in the City of Seattle and would increase energy consumption. Development within the City of Seattle under all alternatives

will primarily be comprised of commercial, industrial, and residential. All new development or redevelopment would be designed and constructed to meet the applicable state and City building and energy conservative code requirements which would reduce energy consumption as compared to prior structures which likely used more energy consumption on a pro rata basis. A mixture of newer and older development would likely be more energy efficient than existing development, based on changes to building codes, innovations in building and technologies, and compliance with City energy conservation measures such as regular building tune-ups.

Residential energy demand for each alternative has been estimated based on EIA annual end-use consumption data for various housing types in the western United States (U.S. EIA, 2015).

~~All-electric space and water heating is required by the 2022 Washington Energy Code. According to household end-use consumption data, approximately 13% of natural gas consumption in residential uses is for purposes other than space and water heating (U.S. EIA, 2015).~~ Natural gas consumption from new building square footage due to ~~target~~ growth under each alternative is summarized in **Exhibit 3.4-5.** See **Appendix E** for detailed calculations and assumptions.

Non-residential consumption has been estimated based on 2020 data on building energy benchmarking for industrial and commercial uses (all non-industrial uses have been assumed to be commercial) (City of Seattle, 2020). Based on benchmark data, it is assumed that commercial uses would consume approximately 47.1 kBtu/SF of electricity and 16.6 kBtu/SF of natural gas and industrial uses would consume approximately 20.8 kBtu/SF of electricity and 10.4 kBtu/SF of natural gas. Estimated increases in electricity usage from new building square footage due to ~~target~~ growth under each alternative is summarized in **Exhibit 3.4-4**. Compared to existing energy per capita energy usage of 0.0002 trillion Btu electricity and 0.00004 trillion Btu natural gas per capita in the State, per capita energy demand of all alternatives would be lower.[21] See **Appendix E** for detailed calculations and assumptions.

Exhibit 3.4-4. Increase in Building Energy Demand—Electricity (trillion Btu)

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Preferred
Residential	1.29	1.58	1.64	1.61	1.91	2.08
Commercial	1.56	1.56	1.56	1.56	1.56	1.56
Industrial	0.37	0.37	0.37	0.37	0.37	0.37
Total Demand	3.22	3.51	3.58	3.54	3.84	4.01
Percent of Statewide Consumption	0.18%	0.20%	0.20%	0.20%	0.22%	0.23%
Per Capita Electricity Demand*	**0.000020**	**0.000017**	**0.000017**	**0.000017**	**0.000016**	**0.000016**

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
* Per capita demand based on projected population increase.
Source: Kimley-Horn, 2024~~3~~.

[21] Statewide per capita energy demand calculated based on U.S. EIA consumption data (2020) and 2020 Census population estimates.

Exhibit 3.4-5. Building Energy Demand—Natural Gas (trillion Btu)

	Alt. 1	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Preferred
Residential	~~0.17~~1.29	~~0.21~~1.58	~~0.21~~1.64	~~0.21~~1.61	~~0.25~~1.91	2.04
Commercial	0.55	0.55	0.55	0.55	0.55	0.55
Industrial	0.18	0.18	0.18	0.18	0.18	0.18
Total Demand	~~0.90~~2.02	~~0.94~~2.32	~~0.95~~2.38	~~0.94~~2.34	~~0.98~~2.65	2.77
Percent of Statewide Consumption	0.27%	0.28%	0.28%	0.28%	0.29%	0.29%
Per Capita Natural Gas Demand*	**0.0000~~055~~ 123**	**0.0000113 ~~046~~**	**0.0000116 ~~046~~**	**0.0000114 ~~046~~**	**0.0000108 ~~040~~**	**0.0000113**

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—edits to Alternatives 1–5 are shown in tracks.
* Per capita demand based on projected population increase.
Source: Kimley-Horn, 2024~~3~~.

All future development would be required to adhere to energy efficiency standards combined with increased efficiency through performance requirements of the 2022 Washington Energy Code and 2018 Seattle Energy Code ~~fostered by the Climate Action Plan and all-electric space and water heating required by the 2022 Washington Energy Code~~.

Equity & Climate Vulnerability Considerations

Based on the City's Climate Change Vulnerability Assessment (2023), the effect of climate change on buildings and energy and the community include energy supply disruptions, electricity transmission damage and interruptions, and energy demand increases. Some highlights of potential effects include:

- Seattle has a relatively higher percentage of households without air conditioning (46%), and the lack of cooling capacity could affect residents particularly in older buildings. As new buildings are constructed, measures to promote building and site design that promote passive cooling may be appropriate. All alternatives have this potential to address cooling needs with Alternative 1 having lower numbers of dwellings than Alternatives 2-4 and Alternative 5 the most.
- Extreme heat events will create increased energy demand for cooling while decreasing capacity and efficiency of energy systems as transmission lines and substations are stressed.
  - Energy demand from buildings is lowest under Alternative 1 and greatest under the Preferred Alternative ~~5~~ due to the range of housing growth estimated 80,000 to 120,000 new units. **Exhibit 3.4-4** and **Exhibit 3.4-5.** Among Alternatives 2 through 4 with the same growth of 100,000 new dwellings but different patterns and types of housing, Alternatives 2 and 4 have lower building energy demand with more compact housing types in neighborhood centers and corridors compared to Alternative 3 with more distributed housing in urban neighborhoods.

- The Climate Change Vulnerability Assessment notes that energy systems in south Seattle are most likely to be affected because this area is more prone to urban heat islands and the impacts of extreme heat. Under all alternatives, there is a potential to modify urban heat islands through the addition or reduction of tree canopy additions. Alternatives 5 and 3 have higher residential growth planned in Area 8 than Alternatives 1, 2, and 4 and the Preferred Alternative. See **Section 3.3 Plants & Animals**.

- Businesses would be subject to increasing costs for insurance, energy, and materials. Small businesses are more vulnerable to climate change impacts than larger businesses. Businesses would be affected by lost labor hours due to extreme heat events. There may be additional burden on some small businesses that may experience brown outs or demand-driven energy price increase. Downtown in Area 4 has the highest number of small businesses presently. While housing growth in Area 4 is the same across the alternatives the action alternatives assume 15% of jobs would be distributed in proportion to residential growth which would increase retail and services jobs to serve the neighborhoods likely in the form of small businesses. Climate vulnerability strategies to address small businesses could support existing and new businesses in all areas.

Impacts of Alternative 1: No Action

Under Alternative 1 future growth would continue based on continuation of the 2035 Comprehensive Plan, with a target housing growth of 80,000 dwelling units for the planning horizon to 2044. New housing would consist primarily of rental apartments concentrated in existing mixed-use areas. Approximately 46% of housing growth would occur within urban centers, approximately 18% would occur within residential urban villages, approximately 16% would occur within hub urban villages, approximately 3% would occur in manufacturing industrial and maritime industrial areas, and the remaining 17% of growth would occur outside designated villages.

Construction Energy Use

As discussed above, construction of future development would result in the consumption of energy in two general forms: (1) the fuel energy consumed by construction vehicles and equipment; and (2) bound energy in construction materials. Implementation of the project is considered a non-project action. Energy demand associated with future development cannot be determined on a program level as construction activities are project-specific. Therefore, a comparative discussion of construction energy consumption is based on projected housing units demolished and target housing growth under each of the alternatives. Alternative 1 would result in the least amount of demolished housing units and the lowest ~~target~~ growth compared to all other alternatives. Therefore, energy consumption associated with construction vehicles and construction materials would likely be the lowest among all alternatives.

Operational Energy Use

Transportation Energy Use

As shown in **Exhibit 3.4-2**, growth associated with Alternative 1 would generate approximately 24.4 million VMT for cars and trucks and approximately 77,000 VMT for buses. Based on model outputs, Alternative 1 would require 0.34 trillion Btu of gasoline, 0.02 trillion Btu of diesel, 0.0002 trillion Btu of natural gas, and 0.0006 Btu of ethanol to accommodate projected citywide VMT.

As shown in **Exhibit 3.4-6,** implementation of Alternative 1 would result in a reduction in gasoline and ethanol fuel consumption and an increase in diesel and CNG consumption with regards to transportation fuel compared to existing conditions. Although Alternative 1 would result in an increase in VMT when compared to existing conditions, reductions in fuel consumption are largely due to improvements in fuel efficiency standards and increase electrification. In addition, net fuel consumption associated with Alternative 1 growth would constitute less than 1% of statewide fuel consumption. Therefore, increases in transportation energy associated with Alternative 1 implementation would not result in consumption of energy in excess of projected supply availability.

Exhibit 3.4-6. Net Annual Transportation Fuel Usage—Alternative 1 (Trillion Btu)

	Existing	Alternative 1	Net Change in Fuel Consumption	% of Statewide (2020) Consumption
Gasoline	0.3471	0.3381	-0.0090	-0.003%
Diesel	0.0141	0.0202	0.0065	0.004%
CNG	0.0001	0.0002	0.0001	0.448%
Ethanol	0.0006	0.0006	-0.0013	-0.006%

Source: Kimley-Horn, 2023

Building Energy Use

As discussed above, a total of 310~~1,779.4~~ trillion Btu of electricity was consumed statewide in 202~~0~~2. A total of 3.22 trillion Btu per year will be required to serve the target housing and employment growth under Alternative 1 on an annual basis. This constitutes approximately 1.04~~0.18~~% of statewide usage in 2022~~0~~, which is nominal compared to existing statewide demand. Therefore, increases in electricity consumption associated with Alternative 1 implementation would not result in consumption of energy in excess of supply availability and would result in a less than moderate impact.

As discussed above, a total of 351~~39.3~~ trillion Btu of natural gas was consumed statewide in 202~~0~~2. A total of 2.02~~0.90~~ trillion Btu per year will be required to serve the target housing and employment growth under Alternative 1. This constitutes approximately 0.58~~27~~% of statewide usage, which is nominal compared to existing statewide demand. Therefore, increases in natural gas consumption associated with Alternative 1 implementation would not result in

consumption of energy in excess of supply availability and would result in a less than moderate impact.

130th/145th Station Area

Under Alternative 1, zoning designations would be retained within the 130th/145th Station Area and no new areas will be designated for mixed-use or higher density than exists under existing conditions. The future light rail station at 130th would be developed in an area that would allow three-story single-purpose residential development and four- to eight-story multifamily in the land surrounding the future 145th BRT Station. Implementation of Alternative 1 assumes a growth potential of 840 housing units and 716 jobs, requiring approximately 0.02 trillion Btu of electricity and 0.005 trillion Btu of natural gas per year. This constitutes approximately 0.001% and 0.005~~1~~% of statewide electricity and natural gas usage, respectively. Therefore, impacts on supply availability related to existing conditions would be nominal.

Impacts of Alternative 2: Focused

Under Alternative 2, areas of focused growth called neighborhood centers would create more housing around shops and services, allowing for a wide range of housing types. The target housing growth under this alternative is 100,000 dwelling units. Approximately 37% of housing growth would occur within regional centers, approximately 24% would occur within neighborhood centers, 15% would occur within residential urban center, 13% would occur within hub urban center, 2% would occur within manufacturing industrial and maritime industrial, and 9% would occur outside designated villages.

Construction Energy Use

Alternative 2 would result in a greater number of demolished housing units compared to Alternative 1 and less than Alternatives 3, 4, and 5 and the Preferred Alternative. Alternative 2 would result in greater ~~target~~ growth compared to Alternative 1, the same as Alternatives 3 and 4, and less than Alternative 5 and the Preferred Alternative. Therefore, energy consumption associated with construction vehicles and construction materials under Alternative 2 would likely be greater than Alternative 1 and lower than Alternatives 3, 4, and 5 and the Preferred Alternative.

Operational Energy Use

Transportation Energy Use

As shown in **Exhibit 3.4-2**, growth associated with Alternative 2 would generate approximately 24.7 million VMT for cars and trucks and approximately 77,000 VMT for buses. Based on model outputs, Alternative 2 would require 0.35 trillion Btu of gasoline, 0.02 trillion Btu of diesel,

0.0002 trillion Btu of natural gas, and 0.0006 Btu of ethanol to accommodate projected VMT. Demand for Alternative 2 would be slightly higher than Alternative 1.

As shown in **Exhibit 3.4-7,** implementation of Alternative 2 would result in a reduction in ethanol fuel consumption and an increase in gasoline, diesel, and CNG consumption compared to existing conditions. Although Alternative 2 would result in an increase in VMT when compared to existing conditions and Alternative 1, increases in fuel consumption compared to Alternative 1 would be similar largely due to improvements in fuel efficiency standards and increase electrification. In addition, net fuel consumption associated with Alternative 2 growth would constitute less than 1% of statewide fuel consumption. Therefore, increases in transportation energy associated with Alternative 2 implementation would not result in consumption of energy in excess of projected supply availability.

Exhibit 3.4-7. Net Annual Transportation Fuel Usage—Alternative 2 (Trillion Btu)

	Existing	Alternative 2	Net Change in Fuel Consumption	% of Statewide (2020) Consumption
Gasoline	0.3471	0.3478	0.0007	0.0003%
Diesel	0.0141	0.0207	0.0065	0.004%
CNG	0.0001	0.0002	0.00005	0.464%
Ethanol	0.0006	0.0006	-0.0013	-0.008%

Source: Kimley-Horn, 2023.

Building Energy Use

As discussed above, a total of 310~~1,779.4~~ trillion Btu of electricity was consumed statewide in 2022~~0~~. A total of 3.51 trillion Btu per year will be required to serve the target housing and employment growth under Alternative 2. This constitutes approximately 1.13~~0.20~~% of statewide usage, which is nominal compared to existing demand. Although growth ~~targets~~ between Alternative 2, 3, and 4 would be the same, variations in housing unit type are associated with differing consumption factors. Although impacts on supply availability related to Alternative 2 would be slightly higher than Alternative 1, increases in electricity consumption associated with Alternative 2 implementation would not result in consumption of energy in excess of supply availability and would result in a less than moderate impact.

As discussed above, a total of 351~~339.3~~ trillion Btu of natural gas was consumed statewide in 202~~0~~2. A total of 2.32~~0.94~~ trillion Btu per year will be required to serve the target housing and employment growth under Alternative 2. This constitutes approximately 0.66~~28~~% of statewide usage, which although slightly greater than Alternative 1, is nominal compared to existing demand. Therefore, increases in natural gas consumption associated with Alternative 2 implementation would not result in consumption of energy in excess of supply availability and would result in a less than moderate impact.

130th/145th Station Area

Under Alternative 2, changes in land use designations focus on addressing transit-oriented developments, designating the station areas as neighborhood centers. Growth would be clustered in small mixed-use nodes near transit, resulting in denser and taller buildings with heights of up to 80 feet. The Station Area's share of the Alternative 2 housing growth ~~target~~ is approximately 2.2%.

Implementation of Alternative 2 assumes a growth potential of 2,208 housing units and 979 jobs, requiring approximately 0.05 trillion Btu of electricity and 0.043~~09~~ trillion Btu per year of natural gas. This constitutes approximately 0.016~~03~~% and 0.012~~03~~% of statewide electricity and natural gas usage, respectively, which are more than double the requirements of Alternative 1. However, impacts on supply availability in comparison with existing conditions would be nominal.

Impacts of Alternative 3: Broad

Under Alternative 3, a wider range of low-scale housing options in urban neighborhood areas would be allowed, expanding housing choices and allowing housing options near existing parks and other amenities. The target housing growth under this alternative is 100,000 dwelling units. Approximately 37% of housing growth would occur within regional centers, approximately 22% would occur within urban neighborhood areas, 15% would occur within residential urban centers, 13% would occur within hub urban centers, 2% would occur within manufacturing industrial and maritime industrial areas, and 11% would occur outside of designated villages.

Construction Energy Use

Alternative 3 would result in the greatest number of demolished units when compared to all other alternatives except for the Preferred Alternative. Alternative 3 would result in greater ~~target~~ growth compared to Alternative 1, the same as Alternative 2 and 4, and less than Alternative 5 and the Preferred Alternative. Although Alternative 3 would result in 763 greater demolished units than Alternative 5, ~~target~~ growth for Alternative 3 includes 20,000 fewer units. Therefore, energy consumption associated with construction vehicles and construction materials under Alternative 3 would likely be greater than Alternative 1, 2, and 4, and lower than Alternative 5 and the Preferred Alternative.

Operational Energy Use

Transportation Energy Use

As shown in **Exhibit 3.4-2**, growth associated with Alternative 3 would generate approximately 24.6 million VMT for cars and trucks and approximately 77,000 VMT for buses. Based on model outputs, Alternative 2 would require 0.35 trillion Btu of gasoline, 0.02 trillion Btu of diesel, 0.0002 trillion Btu of natural gas, and 0.0006 Btu of ethanol to accommodate projected VMT.

Demand for Alternative 3 would be similar to Alternative 2 for all fuel types and slightly higher than demand under Alternative 1.

As shown in **Exhibit 3.4-8,** implementation of Alternative 3 would result in a reduction in ethanol fuel consumption and an increase in gasoline, diesel, and CNG consumption compared to existing conditions. Although Alternative 3 would result in greater VMT when compared to existing conditions and Alternative 1 and lower VMT when compared to Alternative 2, increases in fuel consumption compared to Alternative 1 and 2 would be similar largely due to improvements in fuel efficiency standards and increase electrification. In addition, net fuel consumption associated with Alternative 3 growth would constitute less than 1% of statewide fuel consumption. Therefore, increases in transportation energy associated with Alternative 3 implementation would not result in consumption of energy in excess of projected supply availability.

Exhibit 3.4-8. Net Annual Transportation Fuel Usage—Alternative 3 (Trillion Btu)

	Existing	Alternative 3	Net Change in Fuel Consumption	% of Statewide (2020) Consumption
Gasoline	0.3471	0.3477	0.0006	0.0003%
Diesel	0.0141	0.0207	0.0065	0.0044%
CNG	0.0001	0.0002	0.00005	0.4644%
Ethanol	0.0006	0.0006	-0.0013	-0.0063%

Source: Kimley-Horn, 2023.

Building Energy Use

As discussed above, a total of 310~~1,779.4~~ trillion Btu of electricity was consumed statewide in 2022~~0~~. A total of 3.58 trillion Btu per year will be required to serve the target housing and employment growth under Alternative 3. This constitutes approximately 1.15~~0.20~~% of statewide usage, which is nominal compared to existing demand. Although growth ~~targets~~ between Alternatives 2, 3, and 4 would be the same, variations in housing unit type are associated with differing consumption factors. As growth for Alternative 3 would be lower than Alternative 5 and the Preferred Alternative, electricity consumption associated with Alternative 3 would be lower. Although impacts on supply availability related to Alternative 3 would be slightly higher than Alternatives 1, 2, and 4, increases in electricity consumption would not result in consumption of energy in excess of supply availability and would result in a less than moderate impact.

As discussed above, a total of 351~~39.3~~ trillion Btu of natural gas was consumed statewide in 2022~~0~~. A total of 2.38~~0.95~~ trillion Btu per year will be required to serve the target and employment growth under Alternative 3. This constitutes approximately 0.68~~28~~% of statewide usage, which is nominal compared to existing demand. Although impacts on supply availability related to Alternative 3 would be slightly higher than Alternatives 1, 2, and 4, increases in

natural gas consumption would not result in consumption of energy in excess of supply availability and would result in a less than moderate impact.

130th/145th Station Area

The station area plan would not be implemented under Alternative 3; the area would grow based on the applicable citywide place types.

Impacts of Alternative 4: Corridor

Alternative 4 would accommodate a wider range of housing options only in corridors to focus growth near transit and amenities. The target housing growth under this alternative is 100,000 dwelling units. Approximately 37% of housing growth would occur within regional centers, approximately 21% would occur within urban neighborhood-corridor areas, 15% would be within residential urban centers, 13% would be within hub urban centers, 2% would be within manufacturing industrial and maritime industrial areas, and 12% would be outside of designated villages.

Construction Energy Use

Alternative 4 would result in the demolition of a greater number of housing units than Alternative 1 and 2 and less than Alternatives 3 and 5 and the Preferred Alternative. Alternative 4 would result in greater ~~target~~ growth compared to Alternative 1, the same as Alternatives 2 and 3, and less than Alternative 5 and the Preferred Alternative. Therefore, energy consumption associated with construction vehicles and construction materials under Alternative 4 would likely be greater than Alternatives 1 and 2 and lower than Alternatives 3 and 5 and the Preferred Alternative.

Operational Energy Use

Transportation Energy Use

As discussed above, VMT data was not generated for Alternative 4. Growth ~~targets~~ under Alternative 2, 3, and 4 are the same with respect to the number of housing units and jobs. Therefore, it has been assumed that VMT for Alternative 4 would generally be between VMT of Alternative 2 and 3. Demand for Alternative 2 and Alternative 3 would be similar for all fuel types except ethanol. Ethanol demand under Alternative 3 would be slightly higher than Alternative 2. Impacts on supply availability related to Alternative 4 would be similar to Alternative 2 and Alternative 3.

Building Energy Use

As discussed above, a total of 310~~1,779.4~~ trillion Btu of electricity was consumed statewide in 2022~~0~~. A total of 3.54 trillion Btu per year will be required to serve the target housing and employment growth under Alternative 4. This constitutes approximately 1.14~~0.20~~% of statewide usage, which is nominal compared to existing demand. Demand associated with Alternative 4 would be less than Alternatives 3 and 5 and the Preferred Alternative, the same as Alternative 2, and greater than Alternative 1. Although impacts on supply availability related to Alternative 4 would be slightly higher than Alternative 1, increases in electricity consumption would not result in consumption of energy in excess of supply availability and would result in a less than moderate impact.

As discussed above, a total of 351~~39.3~~ trillion Btu of natural gas was consumed statewide in 202~~0~~2. A total of 2.34~~0.94~~ trillion Btu per year will be required to serve the target housing and employment growth under Alternative 4. This constitutes approximately 0.67~~.28~~% of statewide usage, which is nominal compared to existing demand. Demand associated with Alternative 4 would be less than Alternatives 3 and 5 and the Preferred Alternative, the same as Alternative 2, and greater than Alternative 1. Although impacts on supply availability related to Alternative 4 would be slightly higher than Alternative 1, increases in natural gas consumption would not result in consumption of energy in excess of supply availability and would result in a less than moderate impact.

130th/145th Station Area

The station area plan would not be implemented under Alternative 4; the area would grow based on the applicable citywide place types.

Impacts of Alternative 5: Combined

Alternative 5 and the Preferred Alternative anticipate~~s~~ the largest increases in supply and diversity of housing units within the City. In addition to the growth strategies of Alternatives 2, 3, and 4, Alternative 5 and the Preferred Alternative would promote a greater range of rental and ownership housing and address past underproduction of housing and rising housing costs. The ~~target~~ studied housing growth under this alternative is 120,000 dwelling units. While most housing would continue to be in regional centers (36% of housing growth) and urban centers (19% of housing growth), the combined growth in neighborhood centers and urban neighborhood–corridors would be substantial (24%).

Construction Energy Use

Alternative 5 would result in a greater number of demolished units than Alternative 1, 2, and 4 and less than Alternative 3 and the Preferred Alternative. Alternative 5 would result in the greatest ~~target~~ studied growth compared to all other alternatives and would be the same as the Preferred Alternative. Therefore, energy consumption associated with construction vehicles and

construction materials under Alternative 5 would likely be the greater~~est out of all five alternatives~~ than Alternatives 1 through 4 and less than the Preferred Alternative.

Operational Energy Use

Transportation Energy Use

As shown in **Exhibit 3.4-2**, growth associated with Alternative 5 would generate approximately 25.1 million VMT for cars and trucks and approximately 77,000 VMT for buses. Based on model outputs, Alternative 5~~2~~ would require 0.359~~6~~ trillion Btu of gasoline, 0.0212 trillion Btu of diesel, 0.00016~~2~~ trillion Btu of natural gas, and 0.0067 Btu of ethanol to accommodate projected VMT. ~~Out of all five alternatives, d~~Demand for all fuel types ~~would be the greatest~~ under Alternative 5 would be greater than Alternatives 1, 2, 3, and 4 and slightly lower than the Preferred Alternative.

As shown in **Exhibit 3.4-9,** implementation of Alternative 5 would result in a reduction in ethanol fuel consumption and an increase in gasoline, diesel, and CNG consumption compared to existing conditions. As Alternative 5 would result in greater VMT when compared to existing conditions and ~~all other a~~Alternatives 1 through 4, increases in fuel consumption would be slightly higher largely due to improvements in fuel efficiency standards, increase electrification, and increased densities resulting in reduced VMT per capita. In addition, net fuel consumption associated with Alternative 5 growth would constitute less than 1% of statewide fuel consumption. Therefore, increases in transportation energy associated with Alternative 5 implementation would not result in consumption of energy in excess of projected supply availability.

Exhibit 3.4-9. Net Annual Transportation Fuel Usage—Alternative 5~~3~~ (Trillion Btu)

	Existing	Alternative 5	Net Change in Fuel Consumption	% of Statewide (2020) Consumption
Gasoline	0.3471	0.3596	0.0125	0.0048%
Diesel	0.0141	0.0212	0.0071	0.0047%
CNG	0.0001	0.0002	0.00005	0.4734%
Ethanol	0.0006	0.0007	-0.0013	-0.0064%

Source: Kimley-Horn, 2023.

Building Energy Use

As discussed above, a total of 310~~1,779.4~~ trillion Btu of electricity was consumed statewide in 2022~~0~~. A total of 3.84 trillion Btu per year will be required to serve the target housing and employment growth under Alternative 5. This constitutes approximately 1.24~~0.22~~% of statewide usage, which is nominal compared to existing demand. Although impacts on supply availability related to Alternative 5 would be greater than Alternatives 1 through 4, increases in

electricity consumption associated with Alternative 5 implementation would not result in consumption of energy in excess of supply availability and would result in a less than moderate impact.

As discussed above, a total of 3513~~9.3~~ trillion Btu of natural gas was consumed statewide in 2020~~2~~. A total of 02.65~~,98~~ trillion Btu per year will be required to serve the target housing and employment growth under Alternative 5. This constitutes approximately 0.75~~29~~% of statewide usage, which is nominal compared to existing demand. ~~a~~Although impacts on supply availability related to Alternative 5 would be greater than Alternatives 1 through 4, increases in natural gas consumption associated with Alternative 5 implementation would not result in consumption of energy in excess of supply availability and would result in less than moderate impact.

130th/145th Station Area

Under Alternative 5, an urban centers designation on both the west and east sides of the 130th Station Area would merge with an existing commercial node to expand residential mixed use near the station. Growth would be accommodated in more mixed-use buildings, providing greater housing types in buildings with heights of up to 95 feet. The Station Area's share of the Alternative 5 housing growth ~~target~~ is approximately 2.2%.

Implementation of Alternative 5 assumes a growth potential of 2,703 housing units and 1,004 jobs, requiring approximately 0.05 trillion Btu of electricity and 0.046~~1~~ trillion Btu of natural gas per year. This constitutes approximately 0.017~~03~~% and 0.013~~03~~% of statewide electricity and natural gas usage, respectively. Energy requirements under this alternative would be slightly higher than Alternative 2 and impacts on supply availability in comparison with Alternative 2 would be nominal.

Impacts of Preferred Alternative

Note: The impacts analysis for the Preferred Alternative was added since the Draft EIS.

The Preferred Alternative anticipates an increase in supply and diversity of housing across Seattle similar to Alternative 5. It includes the strategies for encouraging housing growth in the other action alternatives plus some additional changes to existing center boundaries and changes to place type designations beyond Alternative 5. Like Alternative 5, the Preferred Alternative anticipates the largest increase in supply of housing units within the City. As with Alternative 5, the target housing growth under this alternative is 120,000 dwelling units.

Construction Energy Use

The Preferred Alternative would result in the greatest number of demolished units compared to all other alternatives. The Preferred Alternative would result in the greatest growth, along with Alternative 5, compared to all other alternatives. Therefore, energy consumption associated with construction vehicles and construction materials under the Preferred

Alternative would likely be the greatest of all alternatives due to the higher number of demolished units.

Operational Energy Use

Transportation Energy Use

As shown in **Exhibit 3.4-2**, growth associated with the Preferred Alternative would generate approximately 25.2 million VMT for cars and trucks and approximately 77,000 VMT for buses. Growth 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 fuel usage have been estimated by increasing Alternative 5 fuel usage by 0.38%. Based Alternative 5 model outputs, the Preferred Alternative would require 0.36 trillion Btu of gasoline, 0.0213 trillion Btu of diesel, 0.00016 trillion Btu of natural gas, and 0.00067 Btu of ethanol to accommodate projected VMT. Out of all alternatives, demand for all fuel types would be the greatest under the Preferred Alternative.

As shown in **Exhibit 3.4-10,** implementation of the Preferred Alternative would result in a reduction in ethanol fuel consumption and an increase in gasoline, diesel, and CNG consumption compared to existing conditions. As the Preferred Alternative would result in greater VMT when compared to existing conditions and all other alternatives, increases in fuel consumption would be slightly higher largely due to improvements in fuel efficiency standards, increase electrification, and increased densities resulting in reduced VMT per capita. In addition, net fuel consumption associated with the Preferred Alternative growth would constitute less than 1% of statewide fuel consumption. Therefore, increases in transportation energy associated with the Preferred Alternative implementation would not result in consumption of energy in excess of projected supply availability.

Exhibit 3.4-10. Net Annual Transportation Fuel Usage—Preferred (Trillion Btu)

	Existing	Preferred Alternative	Net Change in Fuel Consumption	% of Statewide (2020) Consumption
Gasoline	0.3471	0.3609	0.0138	0.0054%
Diesel	0.0141	0.0213	0.0071	0.0048%
CNG	0.0001	0.0002	0.00005	0.4797%
Ethanol	0.0006	0.0007	-0.0013	-0.0064%

Source: Kimley-Horn, 2024.

Building Energy Use

As discussed above, a total of 310 trillion Btu of electricity was consumed statewide in 2022. A total of 4.01 trillion Btu per year will be required to serve the target housing and employment growth under the Preferred Alternative. This constitutes approximately 1.29% of statewide

usage, which is nominal compared to existing demand. Although impacts on supply availability related to the Preferred Alternative would be greater than all other alternatives, increases in electricity consumption associated with Preferred Alternative implementation would not result in consumption of energy in excess of supply availability and would result in a less than moderate impact.

As discussed above, a total of 351 trillion Btu of natural gas was consumed statewide in 2022. A total of 2.77 trillion Btu per year will be required to serve the target housing and employment growth under the Preferred Alternative. This constitutes approximately 0.79% of statewide usage, which is nominal compared to existing demand. Although impacts on supply availability related to the Preferred Alternative would be greater than all other alternatives, increases in natural gas consumption associated with Preferred Alternative implementation would not result in consumption of energy in excess of supply availability and would result in less than moderate impact.

130th/145th Station Area

Under the Preferred Alternative, similar to Alternative 5, an urban centers designation on both the west and east sides of the 130th Station Area would merge with an existing commercial node to expand residential mixed use near the station. Growth would be accommodated in more mixed-use buildings, providing greater housing types in buildings with heights of up to 85 feet. The Station Area's share of the Preferred Alternative housing growth is approximately 1.8%.

Implementation of the Preferred Alternative assumes a growth potential of 2,152 housing units and 658 jobs, requiring approximately 0.05 trillion Btu of electricity and 0.045 trillion Btu of natural gas per year. This constitutes approximately 0.017% and 0.013% of statewide electricity and natural gas usage, respectively. Energy requirements under this alternative would be slightly lower than Alternative 2 and impacts on supply availability in comparison with Alternative 2 would be similar.

3.4.3 Mitigation Measures

Incorporated Plan Features

- Land Use and Transportation: Diversity in land uses combined with increased density within an urban area can lead to shorter trip distances and greater reliance on walking or mass transit trips, as well as the reduced need for vehicle ownership. Regardless of which alternative is chosen, implementation of the Seattle Comprehensive Plan would result in increased housing options and densities that, together with additional transit options would reduce VMT.
- Climate Element: The action alternatives would result in a new One Seattle Comprehensive Plan including a new Climate Element addressing greenhouse gas emission reductions through VMT reductions and building energy use reductions, and a climate resilience sub-

element addressing adaptation to climate change such as building retrofits and design to provide for cooling and energy demand reduction.

Regulations & Commitments

- ~~The City of Seattle Building Energy Code eliminates the use of fossil fuels like gas and electric resistance from most water heating and space heating systems in new construction and substantial alterations for commercial and multifamily uses.~~ The City of Seattle Energy Code regulates the energy-use features of new and remodeled buildings.
- Seattle's Energy Benchmarking Law (Seattle Municipal Code 22.290) requires the owners of non-residential and multifamily buildings (20,000 square feet or larger) to track and report (annually) energy performance.
- Compliance with the Seattle Building Tune-Ups Ordinance (Seattle Municipal Code 22.930) aims to optimize energy and water performance by identifying low- or no-cost actions related to building operations and maintenance, generating approximately 10-15% energy savings.
- Building Emissions Performance Standards (BEPS) ~~(currently under development as of March 2023)~~ sets ~~energy and/or~~ emissions targets for existing and future buildings over 20,000 square feet that the buildings must meet over time to improve energy efficiency and reduce climate impacts. ~~Seattle Mayor Harrell directed the Office of Sustainability and Environment to develop legislation for carbon-based performance standards for existing commercial and multifamily buildings 20,000 sq. ft or larger. Included in this was a plan to transition all city owned buildings off fossil fuels by 2035. This proposed~~ The Building Emissions Performance Standard (BEPS) complements the CBPS and builds on the City's existing Energy Benchmarking and Building Tune-Up programs. ~~includes standard greenhouse gas intensity targets (GHGITs) for 21 building activity types (e.g., office, retail, multifamily) for each compliance interval until net-zero emissions targets in 2050 (City of Seattle, 2023). The BEPS proposal sets required GHGITs through 2035 and provisional targets from 2036 – 2050 to enable owners to plan, while allowing the later targets to be revised, if needed, by future rules updates. All future development would be required to adhere to energy efficiency standards combined with increased efficiency through performance requirements fostered by the Climate Action Plan and all-electric space and water heating required by the Washington Energy Code.~~

Other Potential Mitigation Measures

Strategies that could be further integrated into plans and programs include encouraging:

- Installation of solar (photovoltaic) and other local generating technologies would reduce demand on energy supplied from public generating and distribution facilities.
- Implementation of sustainable requirements including the construction and operation of LEED-compliant (or similar ranking system) buildings which would reduce the increase required in power systems.

- The use of passive systems and modern power saving units would reduce the use of power in building heating and cooling.
- Use of alternative forms of energy could be included in larger developments where installation is cost effective.
- Implementation of conservation efforts and renewable energy sources to conserve electricity in new developments, including energy efficient equipment (i.e., light bulbs, appliances, and heating and air conditioning), and could reduce energy consumption.

3.4.4 Significant Unavoidable Adverse Impacts

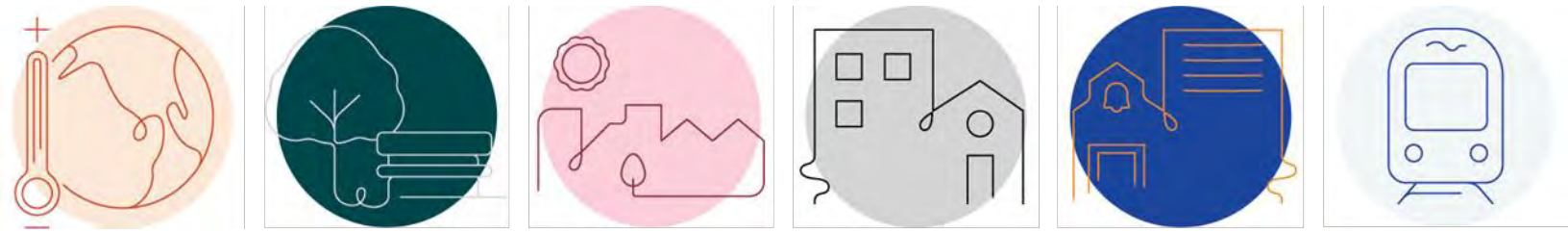
No significant unavoidable adverse impacts on energy are anticipated. The development capacities proposed under all alternatives would increase overall energy consumption. This is mitigated by applying energy codes to new development and VMT measures for building and transportation energy usage. Adherence to energy efficiency measures would ensure that future development would not result in the consumption of energy resources in excess of projected supply availability.

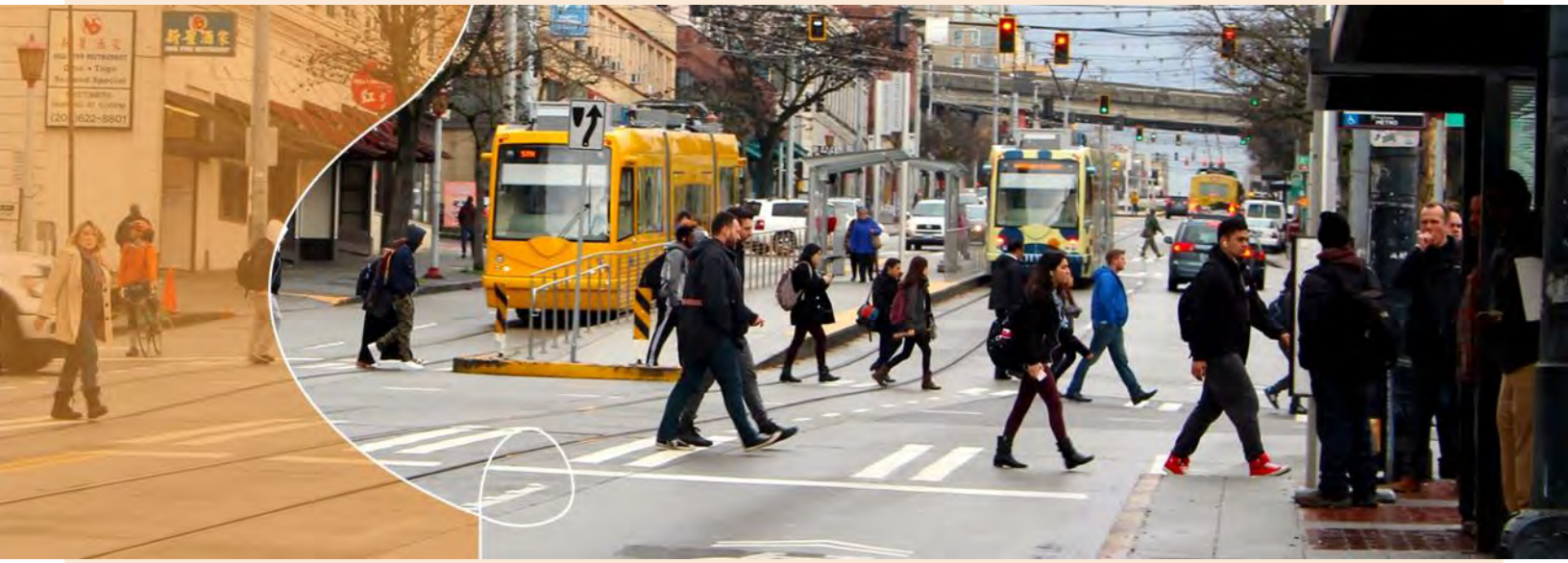
Average annual transportation fuel consumption would increase under all alternatives when compared to existing conditions by less than 1% due to the increase in total VMT associated with projected growth. However, with increased average vehicle fuel efficiency and providing the infrastructure and opportunity for people living and working in the City of Seattle to access alternative transportation modes, action alternatives would not result in the consumption of energy resources in excess of projected supply and would not conflict with energy policies adopted by the City of Seattle.

Since average annual energy use per capita is expected to decrease, the action alternatives would not conflict with energy policies adopted by the City of Seattle.

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3.5 Noise





Source: City of Seattle, 2023.

This section assesses the potential noise/vibration impacts associated with implementing the alternatives considered in this EIS. The following includes acoustical terminology and background information, a presentation of applicable regulatory standards, assessment of acoustical impacts related to implementing the alternatives, and identification of potentially feasible noise mitigation measures where appropriate.

Thresholds of significance utilized in this impact analysis include:

- The alternative would cause future traffic noise levels of 10 dBA or more above existing noise levels.
- Noise-sensitive receivers are concentrated near noise-generating (non-residential) activities or major roadways.

Data & Methods

The project team used a range of data sources for this assessment of ambient, construction, and traffic noise listed below.

- Highway Construction Noise Handbook (FHWA 2006)
- Highway Traffic Noise: Analysis and Abatement Guidance (FHWA 2011)
- City of Seattle Municipal Code (SMC Chapter 25)
- State of Washington Administrative Code (Chapter 173-60 WAC)
- Port of Seattle Aircraft Noise Monitoring System (2022)

3.5.1 Affected Environment

Environmental Noise & Vibration Fundamentals

Sound & Fundamental Noise

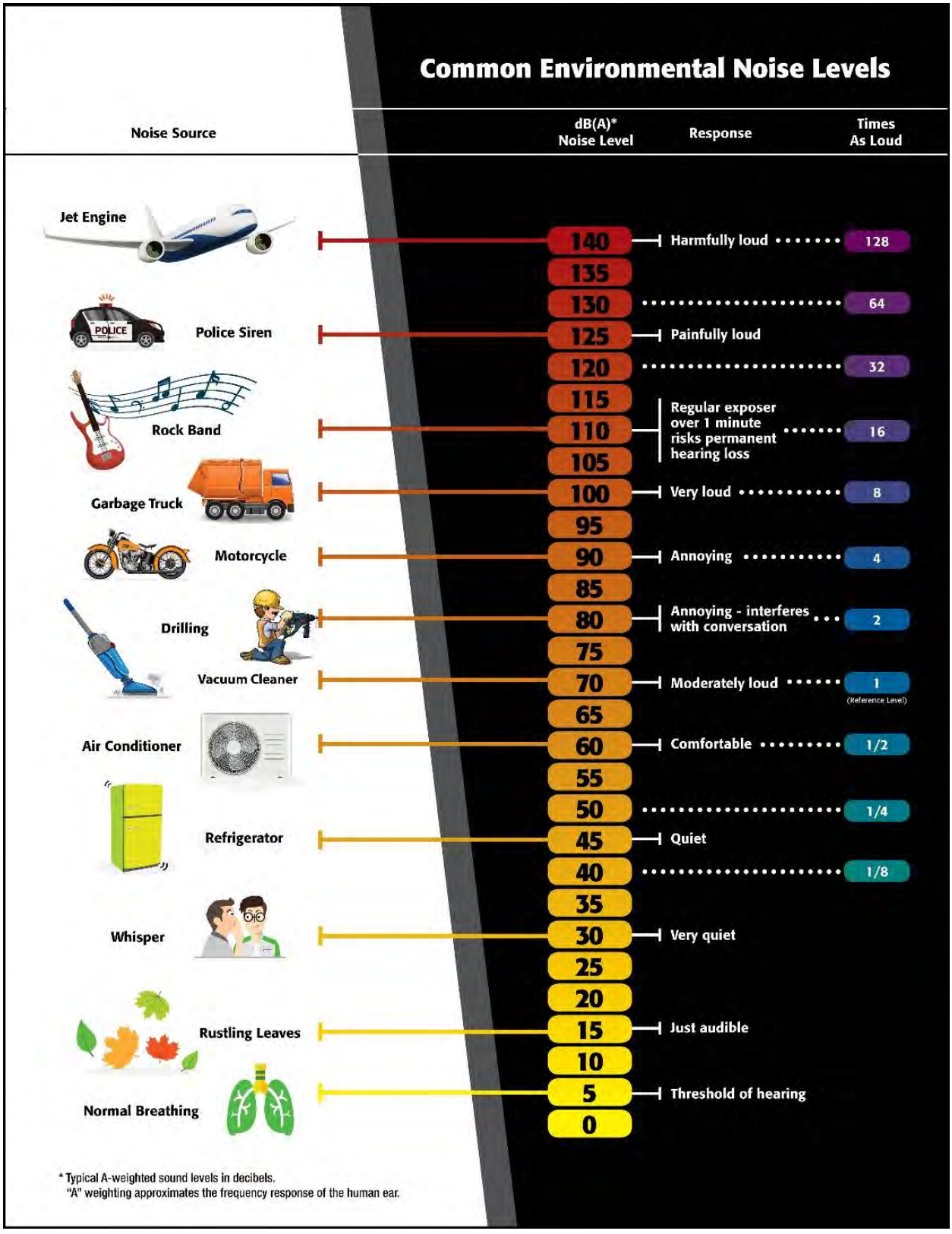
Acoustics is the science of sound. Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a medium (e.g., air) to a human (or animal) ear. If the pressure variations occur frequently enough (at least 20 times per second), they can be heard and are called sound. The number of pressure variations per second is called the frequency of sound and is expressed as cycles per second, or hertz (Hz).

Noise is defined as loud, unexpected, or unwanted sound. The fundamental acoustics model consists of a noise source, a receptor (or "receiver"), and the propagation path between the two. The loudness of the noise source, obstructions, or atmospheric factors affecting the propagation path determine the perceived sound level and noise characteristics at the receptor. Acoustics deal primarily with the propagation and control of sound. A typical noise environment consists of a base of steady background noise that is the sum of many distant and indistinguishable

noise sources. The sound from individual local sources is superimposed on this background noise. These sources can vary from an occasional aircraft or train passing by to continuous noise from traffic on a major highway. Perceptions of sound and noise are highly subjective from person to person. **Exhibit 3.5-1** depicts typical noise levels.

Measuring sound directly in terms of pressure would require a large range of numbers. To avoid this, the decibel (dB) scale was devised. The dB scale uses the hearing threshold of 20 micropascals (μPa) as a point of reference, defined as 0 dB. Other sound pressures are then compared to this reference pressure, and the logarithm is taken to keep the numbers in a practical range. The dB scale allows a million-fold increase in pressure to be expressed as 120 dB, and changes in levels correspond closely to human perception of relative loudness.

Exhibit 3.5-1. Typical Noise Levels



Source: Kimley-Horn and Associates, Inc., 2020.

Noise Descriptors

The dB scale alone does not adequately characterize how humans perceive noise. The dominant frequencies of a sound have a substantial effect on the human response to that sound. Several rating scales have been developed to analyze the adverse effect of community noise on people. Because environmental noise fluctuates over time, these scales consider that the effect of noise on people is largely dependent on the total acoustical energy content of the noise, as well as the time of day when the noise occurs. Most commonly, environmental sounds are described in terms of the equivalent noise level (L_{eq}) that has the same acoustical energy as the summation of all the time-varying events. While L_{eq} represents the continuous sound pressure level over a given period, the day-night noise level (L_{dn}) and Community Equivalent Noise Level (CNEL) are measures of energy average during a 24-hour period, with dB weighted sound levels from 7:00 PM to 7:00 AM. Each is applicable to this analysis and defined in **Exhibit 3.5-2**.

Exhibit 3.5-2. Definitions of Acoustical Terms

Term	Definitions
Decibel (dB)	A unit describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure. The reference pressure for air is 20.
Sound Pressure Level	Sound pressure is the sound force per unit area, usually expressed in µPa (or 20 micronewtons per square meter), where 1 pascal is the pressure resulting from a force of 1 newton exerted over an area of 1 square meter. The sound pressure level is expressed in dB as 20 times the logarithm to the base 10 of the ratio between the pressures exerted by the sound to a reference sound pressure (e.g., 20 µPa). Sound pressure level is the quantity that is directly measured by a sound level meter.
Frequency (Hz)	The number of complete pressure fluctuations per second above and below atmospheric pressure. Normal human hearing is between 20 Hz and 20,000 Hz. Infrasonic sound are below 20 Hz and ultrasonic sounds are above 20,000 Hz.
A-Weighted Sound Level (dBA)	The sound pressure level in dB as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise.
Equivalent Noise Level (L_{eq})	The average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
Maximum Noise Level (L_{max}) Minimum Noise Level (L_{min})	The maximum and minimum dBA during the measurement period.
Exceeded Noise Levels (L_{01}, L_{10}, L_{50}, L_{90})	The dBA values that are exceeded 1%, 10%, 50%, and 90% of the time during the measurement period.
Day-Night Noise Level (L_{dn})	A 24-hour average L_{eq} with a 10 dBA weighting added to noise during the hours of 10:00 PM to 7:00 AM to account for noise sensitivity at nighttime. The

Term	Definitions
	logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.4 dBA L_{dn}.
Community Noise Equivalent Level (CNEL)	A 24-hour average L_{eq} with a 5 dBA weighting during the hours of 7:00 AM to 10:00 AM and a 10 dBA weighting added to noise during the hours of 10:00 PM to 7:00 AM to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.7 dBA CNEL.
Ambient Noise Level	The composite of noise from all sources near and far. The normal or existing level of environmental noise at a given location.
Intrusive	That noise which intrudes over and above the existing ambient noise at a given location. The relative intrusiveness of a sound depends on its amplitude, duration, frequency, and time of occurrence and tonal or informational content as well as the prevailing ambient noise level.

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, September 2018.

Because sound levels can vary markedly over a short period of time, a method for describing either the sound's average character (L_{eq}) or the variations' statistical behavior (L_{XX}) must be utilized. The scientific instrument used to measure noise is the sound level meter. Sound level meters can accurately measure environmental noise levels to within about plus or minus 1 dBA. Various computer models are used to predict environmental noise levels from sources, such as roadways and airports. The predicted models' accuracy depends on various factors, such as the distance between the noise receptor and the noise source, the character of the ground surface (e.g., hard or soft), and the presence or absence of structures (e.g., walls or buildings) or topography, and how well model inputs reflect these conditions.

A-Weighted Decibels

The perceived loudness of sounds is dependent on many factors, including sound pressure level and frequency content. However, within the usual range of environmental noise levels, perception of loudness is relatively predictable and can be approximated by dBA values. There is a strong correlation between dBA and the way the human ear perceives sound. For this reason, the dBA has become the standard tool of environmental noise assessment. All noise levels reported in this document are in terms of dBA, but are expressed as dB, unless otherwise noted.

Addition of Decibels

The dB scale is logarithmic, not linear, and therefore sound levels cannot be added or subtracted through ordinary arithmetic. Two sound levels 10 dB apart differ in acoustic energy by a factor of 10 (Caltrans, 2013). When the standard logarithmic dB is A-weighted, an increase of 10 dBA is generally perceived as a doubling in loudness. For example, a 70-dBA sound is half as loud as an 80-dBA sound and twice as loud as a 60-dBA sound. When two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance

would be 3 dBA higher than one source under the same conditions. Under the dB scale, three sources of equal loudness together would produce an increase of 5 dBA.

Sound Propagation & Attenuation

Sound spreads (propagates) uniformly outward in a spherical pattern, and the sound level decreases (attenuates) at a rate of approximately 6 dB for each doubling of distance from a stationary or point source. Sound from a line source, such as a highway, propagates outward in a cylindrical pattern. Sound levels attenuate at a rate of approximately 3 dB for each doubling of distance from a line source, such as a roadway, depending on ground surface characteristics. No excess attenuation is assumed for hard surfaces like a parking lot or a body of water. Soft surfaces, such as soft dirt or grass, can absorb sound, so an excess ground-attenuation value of 1.5 dB per doubling of distance is normally assumed. For line sources, an overall attenuation rate of 3 dB per doubling of distance is assumed in this report.

Noise levels may also be reduced by intervening structures; generally, a single row of buildings between the noise receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm can reduce noise levels by 5 to 15 dBA (FHWA, 2006). The way older homes were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows. The exterior-to-interior reduction of newer residential units is generally 30 dBA or more.

Human Response to Noise

The human response to environmental noise is subjective and varies considerably from individual to individual. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to undue stress and annoyance. The health effects of noise in the community arise from interference with human activities, including sleep, speech, recreation, and tasks that demand concentration or coordination. Hearing loss can occur at the highest noise intensity levels.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day or night or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL is below 60 dBA, moderate in the 60 to 70 dBA range, and high above 70 dBA (Cowan, 1994, and Harris, 1979). Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet, suburban, residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate-level noise environments are urban residential or semi-commercial areas (typically 55 to 60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60 to 75 dBA) or dense urban or industrial areas (65 to 80 dBA). Regarding increases in dBA, the following relationships should be noted (Caltrans, 2013 and 2017):

- Except in carefully controlled laboratory experiments, a 1-dBA change cannot be perceived by humans.
- Outside of the laboratory, a 3-dBA change is considered a just-perceivable difference.
- A minimum 5-dBA change is required before any noticeable change in community response would be expected. A 5-dBA increase is typically considered substantial.
- A 10-dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

Effects of Noise on People

Hearing Loss

While physical damage to the ear from an intense noise impulse is rare, a degradation of auditory acuity can occur even within a community noise environment. Hearing loss occurs mainly due to chronic exposure to excessive noise but may be due to a single event such as an explosion. Natural hearing loss associated with aging may also be accelerated from chronic exposure to loud noise. The Occupational Safety and Health Administration has a noise exposure standard that is set at the noise threshold where hearing loss may occur from long-term exposures. The maximum allowable level is 90 dBA averaged over 8 hours. If the noise is above 90 dBA, the allowable exposure time is correspondingly shorter (U.S. Department of Labor, 1974).

Annoyance

Attitude surveys are used for measuring the annoyance felt in a community for noises intruding into homes or affecting outdoor activity areas. In these surveys, it was determined that causes for annoyance include interference with speech, radio and television, house vibrations, and interference with sleep and rest. The L_{dn} as a measure of noise has been found to provide a valid correlation of noise level and the percentage of people annoyed. People have been asked to judge the annoyance caused by aircraft noise and ground transportation noise. There continues to be disagreement about the relative annoyance of these different sources. A noise level of about 55 dBA L_{dn} is the threshold at which a substantial percentage of people begin to report annoyance (FICON, 1992).

Ground Borne Vibration

Sources of ground borne vibrations include natural phenomena (earthquakes, volcanic eruptions, sea waves, landslides, etc.) or man-made causes (explosions, machinery, traffic, trains, construction equipment, etc.). Vibration sources may be continuous (e.g., factory machinery) or transient (e.g., explosions). Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Several different methods are typically used to quantify vibration amplitude. One is the peak particle velocity (PPV); another is the root mean square (RMS) velocity. The PPV is defined as the maximum instantaneous positive or

negative peak of the vibration wave and is expressed in terms of inches-per- second (in/sec). The RMS velocity is defined as the average of the squared amplitude of the signal and is expressed in terms of velocity decibels (VdB). The PPV and RMS vibration velocity amplitudes are used to evaluate human response to vibration.

Exhibit 3.5-3 displays the reactions of people and the effects on buildings produced by continuous vibration levels. The annoyance levels shown in the table should be interpreted with care since vibration may be found to be annoying at much lower levels than those listed, depending on the level of activity or the individual's sensitivity. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. Low-level vibrations frequently cause irritating secondary vibration, such as a slight rattling of windows, doors, or stacked dishes. The rattling sound can give rise to exaggerated vibration complaints, even though there is very little risk of actual structural damage. In high noise environments, which are more prevalent where ground borne vibration approaches perceptible levels, this rattling phenomenon may also be produced by loud airborne environmental noise causing induced vibration in exterior doors and windows.

Ground vibration can be a concern in instances where buildings shake, and substantial rumblings occur. However, it is unusual for vibration from typical urban sources such as buses and heavy trucks to be perceptible. Common sources for ground borne vibration are planes, trains, and construction activities such as earthmoving which requires the use of heavy-duty earth moving equipment. For the purposes of this analysis, a PPV descriptor with units of inches per second (in/sec) is used to evaluate construction-generated vibration for building damage and human complaints.

Exhibit 3.5-3. Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibrations

Maximum PPV (in/sec)	Vibration Annoyance Potential Criteria	Vibration Damage Potential Threshold Criteria	FTA Vibration Damage Criteria
0.008	—	Extremely fragile historic buildings, ruins, ancient monuments	—
0.01	Barely Perceptible	—	—
0.04	Distinctly Perceptible	—	—
0.1	Strongly Perceptible	Fragile buildings	—
0.12	—	—	Buildings extremely susceptible to vibration damage
0.2	—	—	Non-engineered timber and masonry buildings
0.25	—	Historic and some old buildings	--

Maximum PPV (in/sec)	Vibration Annoyance Potential Criteria	Vibration Damage Potential Threshold Criteria	FTA Vibration Damage Criteria
0.3	—	Older residential structures	Engineered concrete and masonry (no plaster)
0.4	Severe	—	—
0.5	—	New residential structures, Modern industrial/commercial buildings	Reinforced-concrete, steel or timber (no plaster)

PPV = peak particle velocity; in/sec = inches per second; FTA = Federal Transit Administration
Source: California Department of Transportation, Transportation and Construction Vibration Guidance Manual, 2020 and Federal Transit administration, Transit Noise and Vibration Assessment Manual, 2018.

Current Policy & Regulatory Framework

Federal Guidelines

The U.S. Department of Housing and Urban Development (HUD) has established federal noise abatement and control standards (24 CFR Part 51, Subpart B) for new construction. These standards are widely used to assess the significance of noise impacts in residential communities. According to HUD standards, sites where community noise exposure exceeds a day-night average sound level (L_{dn}) of 65 dB (typically expressed as dBA for averages) are classified as noise-impacted, and interior noise levels within residences—typically 20 dB below exterior levels—should not exceed 45dB. Residential construction in noise-impacted areas require additional noise mitigation features for interior noise levels to meet the 45 dB standard.

In urban areas, noise from vehicles traveling on roads is a major source of noise, and changes in travel patterns and land use have the potential to affect traffic noise. Transportation facilities that receive federal funding (federal-aid projects) are subject to federal noise guidelines from the Federal Highway Administration (FHWA). FHWA also requires state departments of transportation such as the WSDOT to develop noise policies that will apply to projects within that state. WSDOT's 2020 Traffic Noise Policy and Procedures (WSDOT 2020) are consistent with the requirements of FHWA Code Federal Regulations 772 for roadway related traffic noise and are approved by FHWA for federal-aid projects in Washington.

FHWA guidelines require analysis of expected noise impacts and consideration of noise abatement by land use or Activity Category. FHWA applies different noise abatement criteria (NAC) to each Activity Category based on either exterior or interior noise levels. NAC of 67 dBA Activity Category B, which includes single- and multi-family residences, and Activity Category C, which includes places of worship, schools, recreation areas and other similar land uses. **Exhibit 3.5-4** describes WSDOT's NAC by land use category. Activity Category E includes including, hotels, motels, offices, restaurants, bars, or other developed lands with a NAC of 72 dBA. FHWA determines whether a noise impact is expected to occur when predicted future traffic noise

levels approach or exceed the established FHWA a particular Activity Category. The WSDOT definition of approach in this instance is within 1 dBA on the FWHA NAC, or 66 dBA for Activity Categories B and C or 71 dBA for Category E.

Exhibit 3.5-4. Noise Abatement Criteria by Land Use Category

Activity Category	$L_{eq(h)}$*dBA	Description
A	57 (exterior)	Lands on which serenity and quiet are of extraordinary significance and serve an important public need and where the preservation of those qualities is essential if the area is to continue to serve its intended purpose.
B	67 (exterior)	Residential (single and multi-family units)
C	67 (exterior)	Active sport areas, amphitheaters, auditoriums, campgrounds, cemeteries, day care centers, hospitals, libraries, medical facilities, parks, picnic areas, places of worship, playgrounds, public meeting rooms, public or nonprofit institutional structures, radio studios, recording studios, recreation areas, Section 4(f) sites, schools, television studios, trails, and trail crossings
D	52 (interior)	Auditoriums, day care centers, hospitals, libraries, medical facilities, places of worship, public meeting rooms, public or nonprofit institutional structures, radio studios, recording studios, schools, and television studios.
E	72 (exterior)	Hotels, motels, offices, restaurants/bars, and other developed lands, properties or activities not included in A-D or F. Includes undeveloped land permitted for these activities.
F	—	Agriculture, airports, bus yards, emergency services, industrial, logging, maintenance facilities, manufacturing, mining, rail yards, retail facilities, shipyards, utilities (water resources, water treatment, electrical), and warehousing
G	—	Undeveloped lands that are not permitted

Source: WSDOT, 2020.

State Guidelines

Washington State Noise Control Act of 1974

In 1974, the Washington State legislature authorized the establishment of regulations for the abatement and control of noise pollution considering social and economic impacts (Revised Code of Washington 70A.20). Regulations in Washington Administrative Code (WAC) 173-06-040 established maximum permissible noise levels for specific areas or environments called Environmental Designation for Noise Abatement (EDNA), which vary based on the land use of the noise source and the receiving property. Maximum permissible noise levels are measured in decibels generated by the source or project at the property line of adjacent land uses, rather than the combined project and background noise. Maximum Permissible Environmental Noise Levels apply to a variety of activities and facilities including residences, hospitals, commercial services, storage facilities, warehouses and distribution facilities, and industrial property. However, electrical substations, certain industrial installations, mobile noise sources, vehicles traveling in

the public right of way, and warning devices (i.e., bells) are exempt. The state provisions have been adopted by most cities around the state, including the City of Seattle (SMC 25.08).

City Guidelines

Seattle Municipal Code 25.08 Noise Control

Operational Noise Standards

Chapter 25.08 of the Seattle Municipal Code (SMC) establishes exterior sound level limits for specified land use zones or "districts," which vary depending on the district of sound source and the district of the receiving property. The exterior sound limits based on noise source and receiving property in the City of Seattle Noise control ordinance are summarized in **Exhibit 3.5-5**.

Exhibit 3.5-5. Maximum Permissible Noise Level

	EDNA Receiver of Noise (Maximum Allowable Sound Level in dBA L_{eq})		
EDNA Source of Noise	Residential	Commercial	Industrial
Class A Residential	55	57	60
Class B Commercial	57	60	65
Class C Industrial	60	65	70

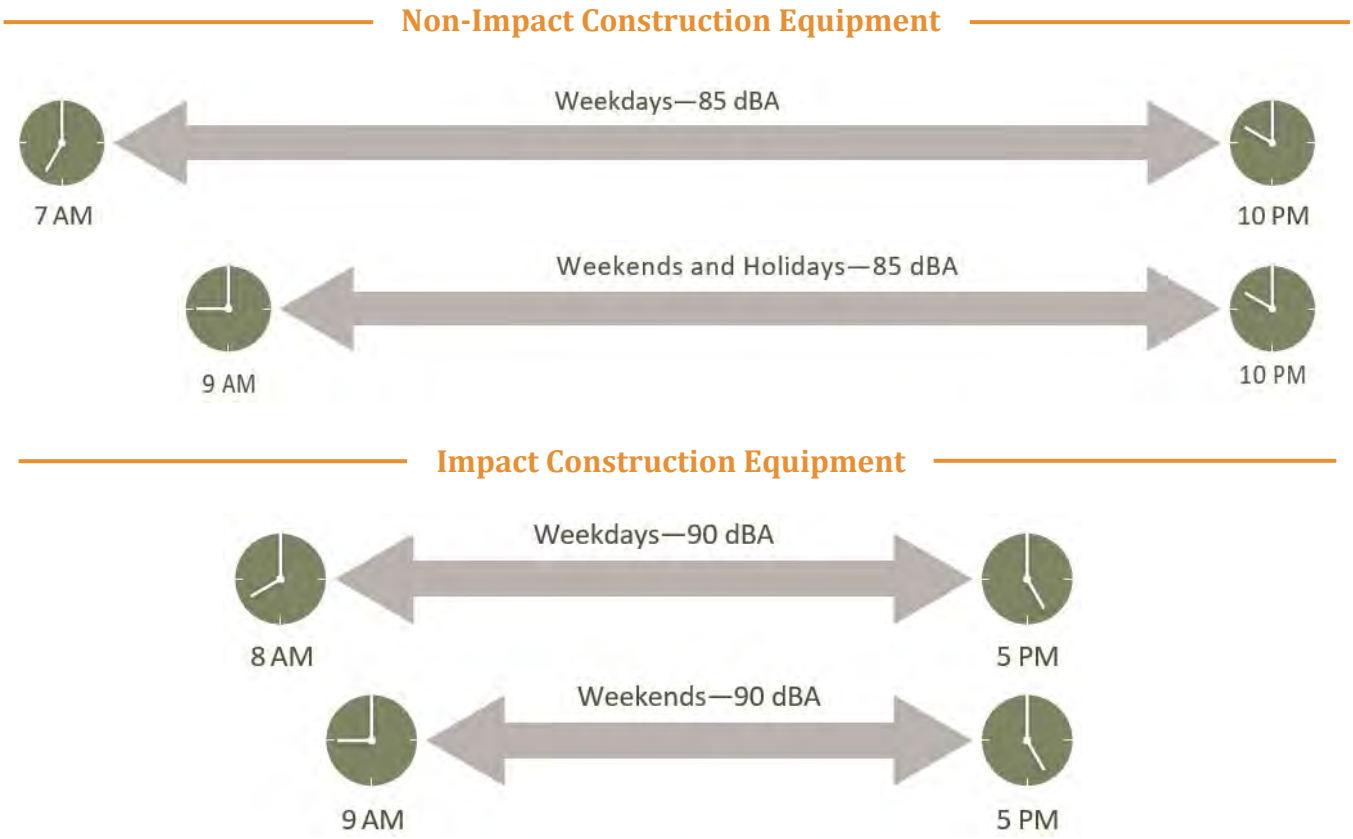
Source: City of Seattle Noise Control Ordinance SMC Chapter 25.08, 2023.

Between the hours of 10 PM and 7 AM on weekdays and 10 PM and 9 AM during weekends, the maximum limits for receivers within residential zones are to be reduced by 10 dBA. For noise of short duration, these limits can be exceeded by a maximum of 5 dBA for 15 minutes/hour, 10 dBA for 5 minutes/hour, or 15 dBA for 1.5 minutes/hour.

Construction Noise Standards

The City's Noise Control code allows the exterior sound level limits to be exceeded by certain types of construction equipment operating in most commercial districts between 7 AM and 10 PM on weekdays and between 9 AM and 10 PM on weekends and legal holidays (SMC 25.08.425; see **Exhibit 3.5-6**). The types of equipment that would usually exceed the exterior sound level limit of 60 dBA are tractors, loaders, excavators, and cranes. This equipment may exceed the applicable standard by up to 25 dBA (an 85 dBA standard) when measured at a reference distance of 50 feet. Use of impact equipment—such as a pile driver—is restricted to between 8 AM and 5 PM on weekdays and between 9 AM and 5 PM on weekends and holidays. It is also limited to a continuous noise level of 90 dBA and a maximum noise level of 99 dBA L_{max} when measured at a reference distance of 50 feet.

Exhibit 3.5-6. Construction Noise Time Limits



Source: City of Seattle Noise Control Ordinance SMC Chapter 25.08, 2023.

Current Conditions

Citywide

Traffic Noise Sources

Traffic noise exposure is comprised of several factors: the volume of vehicles per day, the speed of those vehicles, the number of those vehicles that are medium and heavy trucks, the distribution of those vehicles during daytime and nighttime hours, and the proximity of noise-sensitive receivers to the roadway. Existing traffic noise exposure is expected to be as low as 50 dB L_{dn} in the most isolated areas of the City, while receivers adjacent to interstate highways are likely to experience levels as high as 75 dB L_{dn} (U.S. Department of Transportation 2022). Traffic noise assessment in this analysis is also inclusive of bus transit, as buses are an assumed percentage of overall roadway volumes used in the calculation of roadside noise levels.

Exhibit 3.5-7 presents the distance to various noise contours for representative roadways within each subarea in Seattle. The modeled roadway segments were selected to provide an

estimate of traffic noise impacts from implementation of the alternatives and compare to the measured ambient noise levels provided in **Exhibit 3.5-7**. The values in **Exhibit 3.5-7** do not take into consideration the presence of existing sound barriers, topographical conditions or roadway elevation, all of which can vary by location. The 65 L_{dn} contour is important because it represents the exterior noise level which can be reduced to 45 dBA L_{dn} using standard construction techniques. An interior noise level of 45 L_{dn} is the commonly accepted maximum recommended interior noise level for residential uses (EPA, 2016).

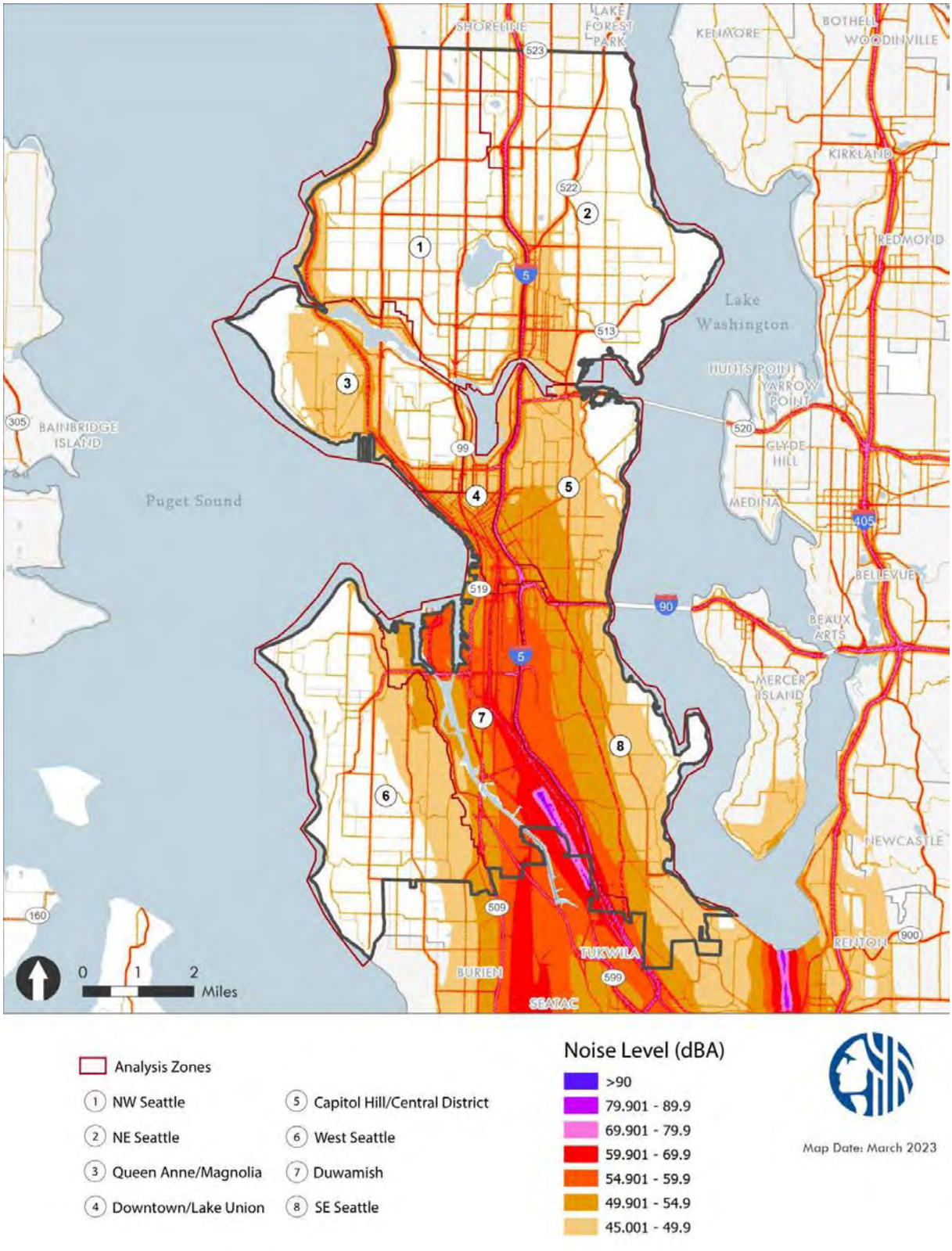
Exhibit 3.5-7. Existing Roadway Noise Levels

Roadway	Roadway Segment	Ldn at 150' from Roadway Center	Distance (feet) from Roadway Center to Noise Contours		
			65 dBA Ldn	60 dBA Ldn	55 dBA Ldn
Martin Luther King Jr Way S	Between S Jackson St and S Massachusetts St	58.4	33	105	332
	Between S Orcas St and S Graham St	59.7	—	139	440
Harbor Ave SW/Alki Ave SW	Between SW Admiral Way and California Way SW	57.5	—	83	264
Beacon Ave S	Between S Spokane St and S Columbian Way	54.8	—	46	144
34th Ave W	Between W Barrett St and W McGraw St	54.3	—	40	127
Roosevelt Way NE	Between NE Northgate Way and 80th St	56.7	—	70	220
Roosevelt Way NE	Between 5th Ave NE and 10th Ave NE	60.9	59	186	588
15th Ave NE	Between NE 135th St and NE 145th St	58.9	—	116	367

Source: Kimley-Horn, 2023.

According to the U.S. Department of Transportation National Transportation Noise Map, traffic noise levels along major highways and freeways in the City (e.g., I-5, I-405, I-90, and Highway 99) range from approximately 50 dBA L_{eq} to 75 dBA L_{eq} (U.S. Department of Transportation 2022). The National Transportation Noise Map is provided in **Exhibit 3.5-8**.

Exhibit 3.5-8. National Transportation Noise Map



Source: U.S. Department of Transportation, 2022.

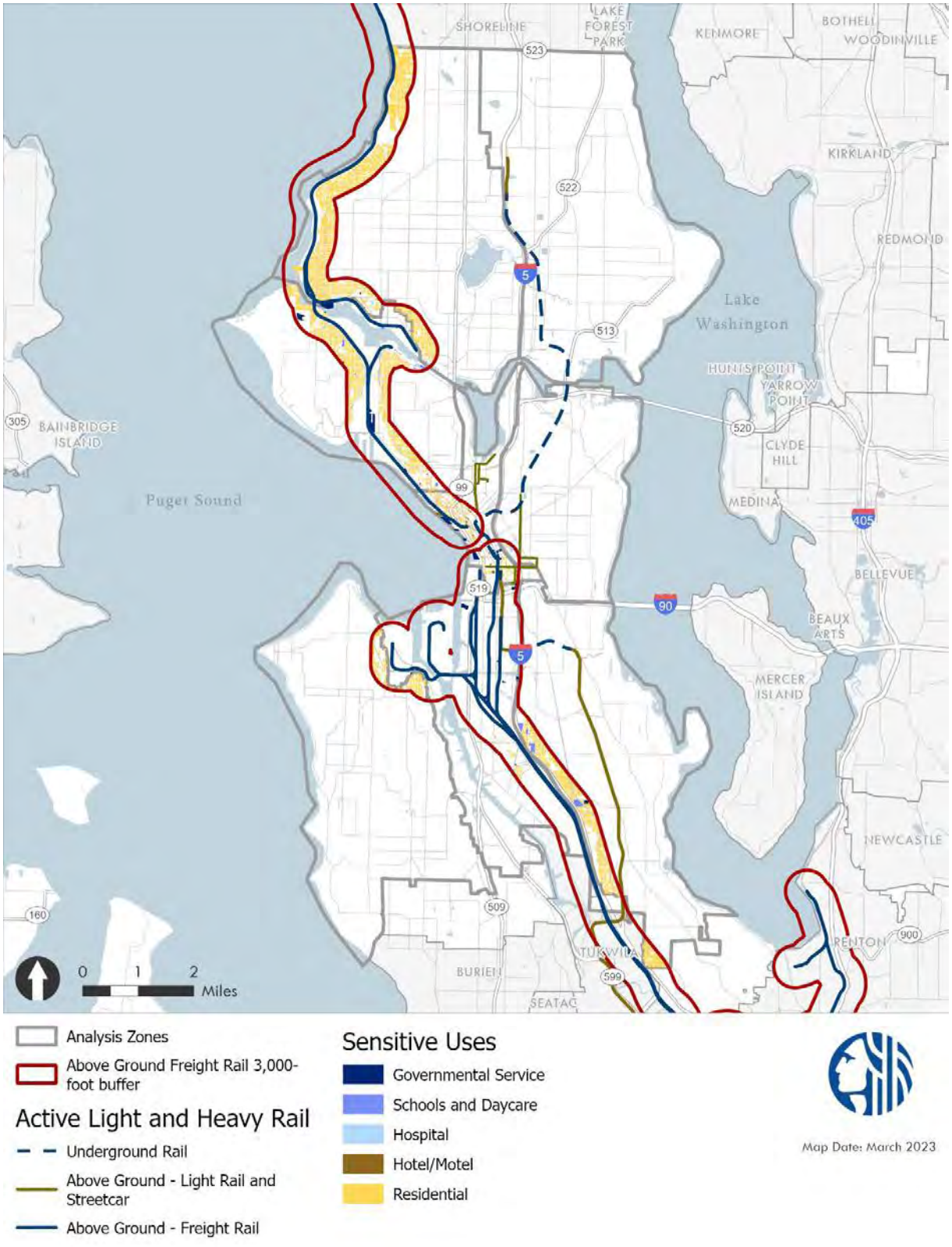
Rail Noise Sources

Seattle is also affected by noise from freight and passenger rail operations. While rail operations generate substantial noise levels in the immediate vicinity of railways, train operations are intermittent and area railways are widely dispersed. Sound Transit's light rail system operates frequently but thanks to electrification, lower speeds, and lighter loads, this results in overall lower noise levels than heavy rail systems. The contribution of rail noise to Seattle's ambient noise environment is relatively minor compared to other sources such as roadway traffic. However, areas near freight rail yards often experience higher noise levels due to the maintenance of rail vehicles, assembly of trains, and idling engines. Train operations can also be a source of significant ground-borne vibration near railroad tracks and yards. Vibration-sensitive receivers located within 100 feet of rail operations may be adversely affected by vibration exposure during train events (FTA, 2018). **Exhibit 3.5-9** shows active rail lines in the City of Seattle.

Aircraft Noise Sources

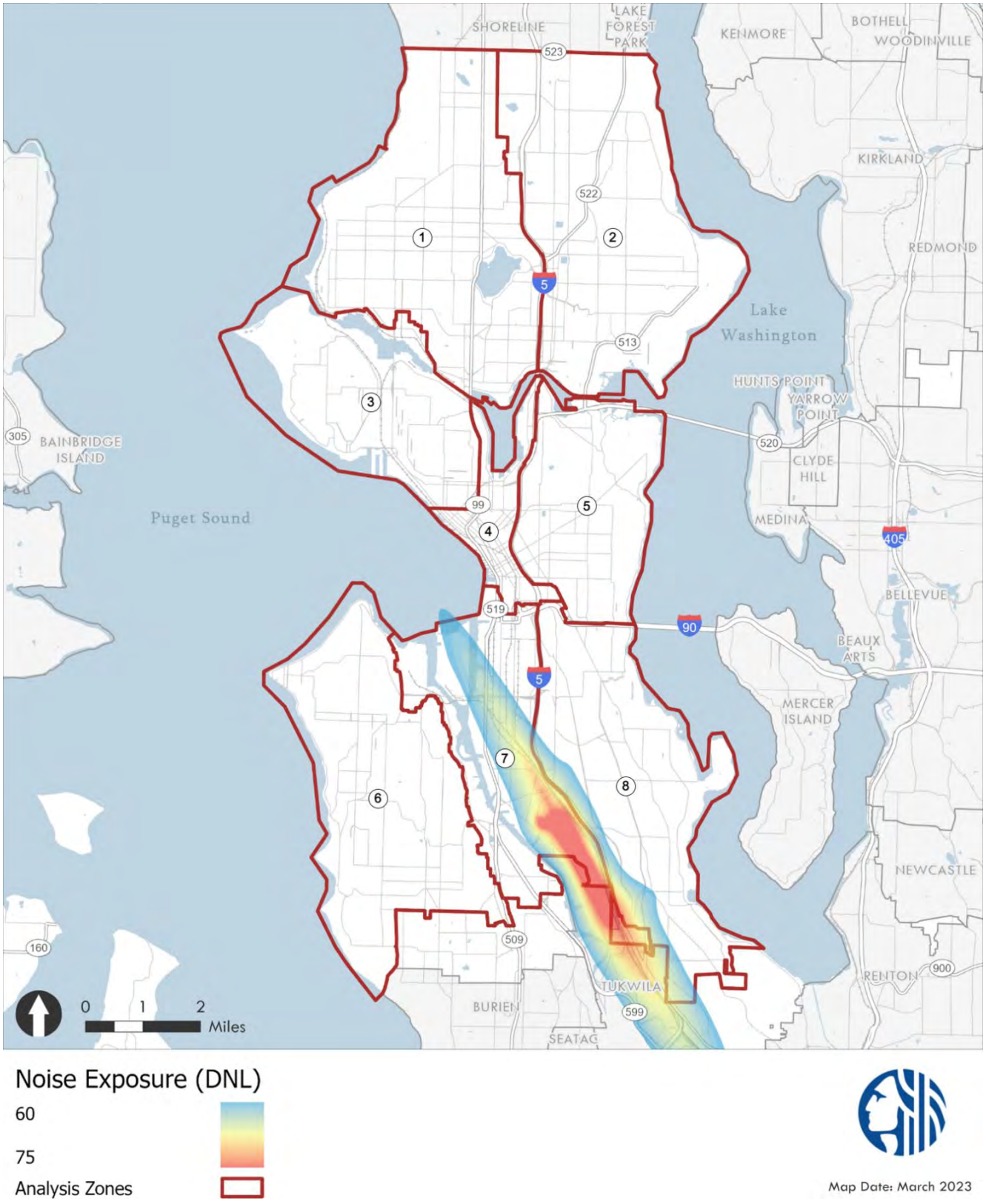
King County International Airport (also known as Boeing Field) is located in the southern portion of the City and generates approximately 500 aircraft operations a day. Aircraft originating from other airports such as Seattle-Tacoma International Airport frequently fly over Seattle. All these operations contribute to the overall ambient noise environment within the City. Similar to rail noise, the proximity of the receiver to the airport and aircraft flight path influences the noise level exposure. Other contributing factors include the type of aircraft operated, altitude of the aircraft, and atmospheric conditions. Atmospheric conditions may contribute to the direction of aircraft operations (flow) and affect aircraft noise propagation. The 60-75 DNL noise contours for Boeing Field are shown in **Exhibit 3.5-10**. As shown in **Exhibit 3.5-10**, the highest noise levels (up to 75 DNL) are concentrated near the central portion of the Boeing Field Airport where the runway is located. Lower noise levels (approximately 60-70 DNL) extend further to the northwest and southeast of the airport and follow the general flight path for airplanes departing/arriving at Boeing Field.

Exhibit 3.5-9. Active Rail Lines in Seattle



Source: Kimley Horn, 2023.

Exhibit 3.5-10. Boeing Field Noise Contours



Source: Kimley Horn, 2023.

Construction Noise Sources

Construction activities related to new development and transportation improvements can create high noise levels of relatively short duration. Noise generated by construction equipment varies greatly depending on factors such as the operation performed, equipment type, model, age, and condition. Noise from heavy equipment diesel engine operations can dominate the noise environment surrounding construction sites. Other stationary equipment sources such as generators, pumps, and compressors can also contribute significantly. Operation of impact equipment such as pile drivers generally produces the highest noise levels and may also produce significant vibration in the vicinity. Maximum noise exposure from typical construction equipment operations is approximately 75–100 dB (L_{max} at 50 feet), the highest noise production from heavy demolition and pile driving operations. Please refer to **Exhibit 3.5-11** for typical construction noise levels.

Exhibit 3.5-11. Typical Noise Levels from Construction/Demolition Equipment

Construction Equipment	Typical Noise Level at 50 ft from Source
Air Compressor	80 dBA
Backhoe	80 dBA
Compactor	82 dBA
Concrete Mixer (Truck)	85 dBA
Concrete Pump (Truck)	82 dBA
Concrete Vibrator	76 dBA
Crane	83 – 88 dBA
Dozer	85 dBA
Generator	82 dBA
Grader	85 dBA
Jack Hammer	88 dBA
Loader	80 dBA
Paver	85 dBA
Pile Driver (Impact)	101 dBA
Pneumatic Tool	85 dBA
Pump	77 dBA
Shovel	82 dBA
Truck	84 dBA

Source: FTA Transit Noise and Vibration Impact Assessment Manual, 2018.

Industry & Other Non-Transportation Noise Sources

A wide variety of industrial and other non-transportation noise sources are located in Seattle. These include manufacturing plants, marine shipping facilities, landfills, treatment plants (e.g., water), food packaging plants and lumber mills, and other general industrial facilities. Noise generated by these sources varies widely and are often intermittent but can exceed 80 dBA close to the source for some activities (City of Seattle, 2022). Noise generated by these sources varies widely, but in many cases may be a significant contributor to a local noise environment.

Noise Levels in Seattle

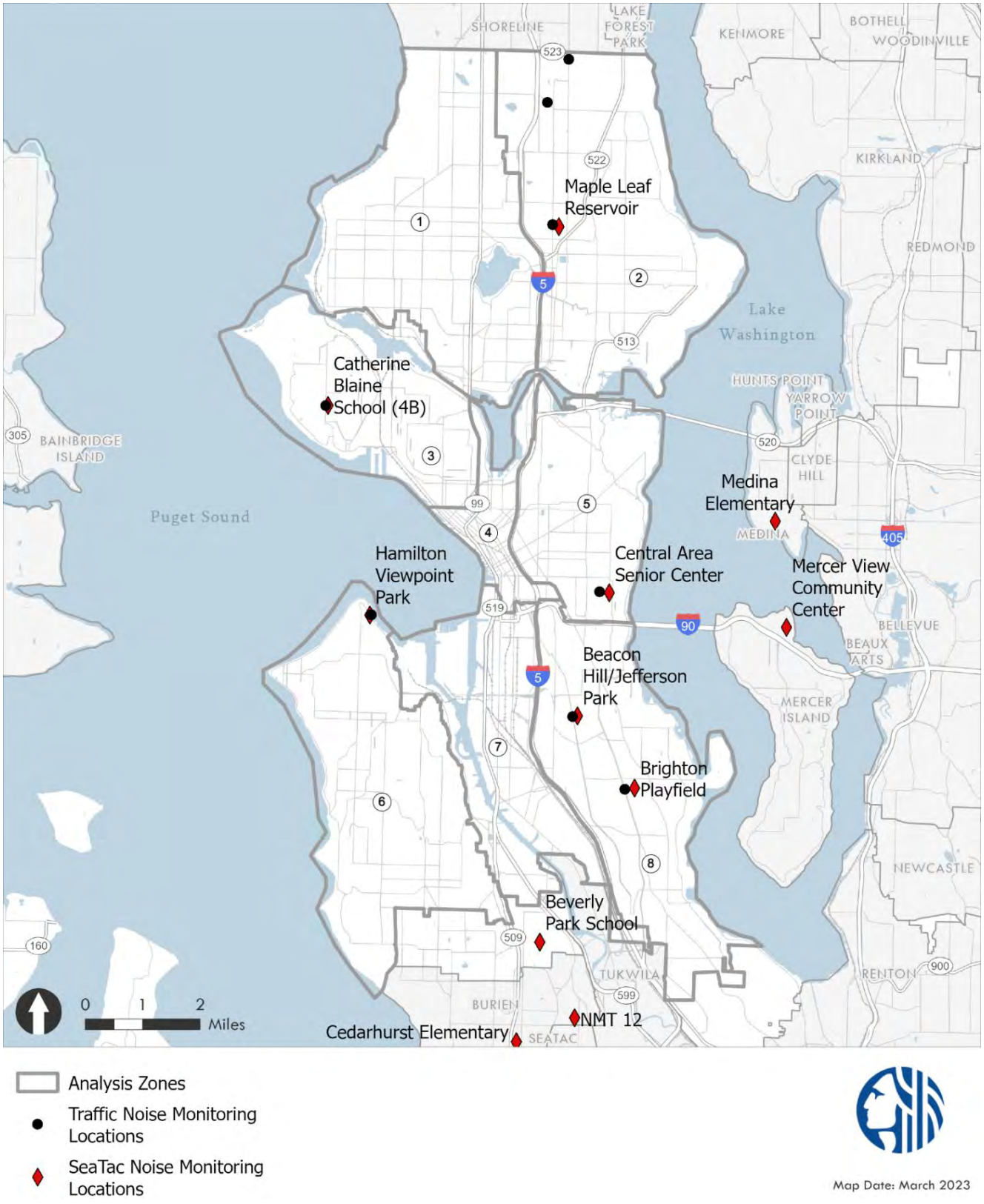
The most recent full year of ambient noise data in Seattle from the Port of Seattle's Aircraft Noise Monitoring System is shown in **Exhibit 3.5-12**. As indicated in **Exhibit 3.5-12**, measured ambient noise levels at various locations throughout the City range from 52.3 dBA L_{eq} to 62.0 dBA L_{eq} and are typical of developed urban areas. In addition, the average annual maximum (or instantaneous) noise levels reach 88.1 dBA but are short in duration and typically only last a few seconds; see **Exhibit 3.5-12**. Maximum noise levels can occur from cars or trucks passing by, train horns, emergency vehicle sirens, and other high-generating noise sources. It is noted there are slightly higher noise levels at the Jefferson Park noise monitoring station, which may reflect an increase of nearly 80,000 take-offs and landings at Seattle-Tacoma International airport between 2020 and 2021, a recovery in air traffic from the COVID-19 pandemic. This noise monitor is directly beneath the flight path for Seattle-Tacoma International Airport, and the Beacon Hill neighborhood of Seattle is more affected my aircraft noise than other areas within Seattle covered by the Port's noise monitoring system; see **Exhibit 3.5-13**.

Exhibit 3.5-12. Average Annual Noise Level (most recent complete year) for Selected Monitoring Locations in Seattle

Measurement Location (Noise Monitoring Location)	Avg Annual L_{eq} dBA	Avg Annual L_{max} dBA
NMT3: Maple Leaf Reservoir (2020)—Area 2: NE Seattle	54.7	83.4
NMT4: Catherine Blain School (2020)—Area 3: Queen Anne/Magnolia	52.3	80.6
NMT6: Hamilton Viewpoint Park (2020)—Area 6: West Seattle	58.1	82.9
NMT7: Central Area Senior Center (2020)—Area 5: Capitol Hill/Central District	54.7	83.4
NMT9: Jefferson Park (2021)—Area 8: SE Seattle	62.0	88.1
NMT10: Brighton Playfield (2020)—Area 8: SE Seattle	54.7	85.7

Source: Port of Seattle, 2022.

Exhibit 3.5-13. Noise Monitoring Locations



Source: Kimley Horn, 2023.

Sensitive Receivers

Noise-sensitive land uses are generally defined as locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Noise-sensitive land uses typically include residences, hospitals, schools, transient lodging, libraries, and certain types of recreational uses. Noise-sensitive residential receivers are found throughout the study area.

Analysis Areas

Area 1: NW Seattle

The predominant source of noise in the Northwest Seattle subarea is from transportation. The Sound Transit N line runs along the western edge of this area. The line operates locomotives, with anywhere from 2-7 passenger railcars. This railway also services BNSF freight locomotives and Amtrak passenger rail. The U.S. Department of Transportation National Transportation Noise Map (U.S. Department of Transportation, 2018) illustrates that areas near the rail line are typically in the upper 50 dBA LA_{eq} range for 24-hour noise levels. While rail operations generate significant noise levels in the immediate vicinity of the railways, train operations are infrequent and area railways are widely dispersed. In addition, the contribution of rail noise to the overall ambient noise environment in this subarea is relatively minor compared to other sources such as traffic. The most notable traffic noise sources in the Northwest Seattle area are from Highway 99, 15th Ave NW, and Holman Rd NW. The biggest contributor to noise in this area is proximity to I-5, with 24-hour LA_{eq} levels reaching over 70 dBA when in close proximity. For most areas outside major roadways, ambient noise levels are observed to be minimally affected by traffic noise. Industrial Marina areas are also present along the southern limit of the area near Lake Union and contribute to the existing noise environment.

Area 2: NE Seattle

The noise environment in the Northeast Seattle subarea is mainly comprised of roadway traffic and rail transit noise. A portion of the Sound Transit Link 1 Line traverses through the southernmost portion of this subarea in a northwest direction to Northgate, transitioning from a tunnel to an elevated track profile north of N 92nd Street in Maple Leaf. This area also has notable roadway traffic noise, primarily from Highway 522 and 513, and I-5 along the western border of this subarea trending in a north-south direction. The University District and the uses associated with the University of Washington are also a source of noise from road traffic and a concentration of human activity and sporting events. Marina areas are also present along the southern limit of the area near Lake Union and contribute to the existing noise environment.

130th/145th Station Area

The 130th/145th Station Area (Station Area) is located within the Pinehurst and Haller Lake neighborhoods. Most of the Station Area consists of a mix of single- and multi-family residential uses. However, approximately 16% of the area within a half mile of the Station Area is

comprised by the Jackson Park Golf Course, and a smaller portion of the Station Area is comprised of commercial and institutional (school) uses. The primary noise source in this area is road noise from I-5 freeway traffic and adjacent Sound Transit railways.

Area 3: Queen Anne/Magnolia

The same rail line that traverses Northwest Seattle (Sound Transit N Line) continues through the Queen Anne/Magnolia subarea, with Sound Transit Sounder Locomotives, Amtrak passenger rail and BNSF freight lines. Furthermore, the Balmer Yard in Interbay is an 80-acre rail yard with 41 parallel tracks. This industrial area that separates Queen Anne and Magnolia extends to the smith cove terminal, where cruise ships often dock. The National Transportation Noise Exposure Map shows that areas near the industrial sector experience noise levels up to 50 dBA for 24-hour LA_{eq} levels. Significant sources of roadway traffic noise include the Magnolia Bridge, 15th Ave W, Elliot Ave W, and Nickerson St.

Area 4: Downtown/Lake Union

The Downtown/Lake Union subarea has the highest concentration of roadway traffic noise of all subareas, which is to be expected with high traffic volumes in densely developed urban areas. Noise travels further and in various directions in this subarea due to the amount of sound reflective hard surfaces such as tall concrete buildings and a majority of concrete groundcover. I-5 is the largest contributor to traffic noise in the Downtown/Lake Union area; however, Alaskan Way, Mercer Street, and Aurora Ave/Highway 99 are also significant road noise sources, reaching into the 60-70 dBA range for 24-hour LA_{eq} levels. The National Transportation Exposure Map (Seto, 2023) shows noise levels within this subarea ranging from 50 dBA LA_{eq} in the central Downtown areas up to approximately 80 dBA LA_{eq} near I-5.

Area 5: Capitol Hill/Central District

I-5, Highway 90, and Highway 520 are the major sources of noise in the Capitol Hill/Central District subarea. 23rd Ave, Boren Ave, Madison St, and ML King Jr Way are also high-traffic roadways that are notable roadway noise sources. The Seattle Streetcar First Hill Line passes through this subarea, running north-south along Broadway. In addition, a portion of the Sound Transit Link 1 Line traverses through the western portion of this subarea in a north-south direction. This area is primarily residential, with very few industrial sources of noise.

Area 6: West Seattle

The significant roadway noise sources in the West Seattle subarea are the West Seattle Bridge, California Ave S, Fauntleroy Way SW, 35th Ave SW, Delridge Way SW, W Marginal Way, and SW Roxbury St. The northern areas of this subarea are located close to Terminal 5 and Harbor Island, both parts of the Port of Seattle. In this industrial area is also Nucro Steel, which along with the port, brings in additional freight train traffic.

Area 7: Duwamish

Boeing Field is located in the southeastern portion of the Duwamish subarea, and therefore this subarea has the highest levels of airplane noise. Areas near the airport experience noise levels in 75-80 dBA range, while the majority of the subarea is located within the 60-70 dBA noise level contour range. This area also contains two large rail yards, the Union Pacific Argo Yard and BNSF Stacy Yard. This area also contains a large portion of the Port of Seattle. These intermodal facilities run year-round every day. This subarea is predominantly comprised of industrial uses, with some residences located in the southern portion adjacent to the Boeing Field Airport and separated by the Duwamish waterway, which is roughly 500 feet in width. This area also includes the Sound Transit's Link OMF Central, which maintains the light rail trains that service Seattle. This area also has significant noise sources from Highway 99 and Highway 509, as well as the I-5 freeway.

Area 8: SE Seattle

The westernmost portion of the Southeast Seattle subarea is located within the 60-65 noise contour for Boeing Field, while the southwestern portion of this subarea is located within the 60-75 noise contour near the I-5 and Highway 90 interchange. The most notable roadway traffic noise sources are S Columbian Way, Martin Luther King Jr Way S and Rainer Ave S, as well as I-5 and I-90. The Sound Transit's Link Light Rail 1 line runs along Martin Luther King Jr Way S. The Beacon Hill Seattle Noise Project (Seto, 2018) collected 24-hour noise measurements during the spring and summer of 2018 and observed areas with high levels. The sites with the highest noise readings were located near the three notable roadways mentioned above (S Columbian Way, Martin Luther King Jr Way S and Rainer Ave S).

3.5.2 Impacts

Impacts Common to All Alternatives

Construction Noise & Vibration Impacts

The proposed alternatives envision future residential and job growth primarily within urban centers and villages, and also focus growth in compact, walkable, mixed-use neighborhoods linked by transit. Resulting construction activities associated with development of new residences, commercial and retail land uses, and mixed-use developments would have the potential to temporarily affect nearby sensitive receivers such as existing residences, schools, and nursing homes.

Temporary construction noise and vibration within the identified growth areas would occur in urban or suburban areas where ambient noise and vibration levels are influenced by roadway traffic and other transportation sources and would therefore be less noticeable to noise-sensitive receivers than if these activities were to occur in undeveloped areas of the City.

Section 25.08.425 of the Seattle Municipal Code establishes construction noise standards that limit construction activities to times when construction noise would have the least effect on adjacent land uses, and restrict the noise generated by various pieces of construction equipment. Development under the alternatives would range from the construction of high-rise residences in urban centers to townhomes and detached homes in corridors and residential neighborhoods. Consequently, depending on the extent of construction activities involved and background ambient noise levels, localized construction-related noise effects could vary widely.

Construction activities with the highest potential for construction-related noise or vibration impacts are those that require pile driving or other similar invasive foundation work. These types of construction activities are generally associated with high-rise development which all alternatives envision to occur within urban centers.

The Seattle noise ordinance restricts the use of impact equipment, such as pile drivers, to 8 AM to 5 PM on weekdays and 9 AM to 5 PM on weekends and holidays and limits their operation to a continuous noise level of 90 dBA and a maximum noise level of 99 dBA L_{max} when measured at a reference distance of 50 feet.

Because development within urban centers may require pile driving adjacent (within 50 feet) to other buildings that could be occupied by residents or other sensitive receptors, construction noise impacts in excess of 90 dBA within these areas are identified as a potential moderate noise impact and mitigation is identified.

The City of Seattle does not enforce quantitative vibration standards. Construction-related vibration impacts from pile driving and other construction equipment are generally assessed in environmental review documents using the methodology of the Federal Transit Administration (FTA) which includes standards for structural damage as well as for human annoyance.

Pile driving can result in peak particle velocities (PPV) of up to 1.5 inches per second (in/ sec) at a distance of 25 feet (FTA 2018), but typically average about 0.644 PPV. The FTA utilizes a threshold of architectural damage for conventional sensitive structures of 0.3 in/sec PPV for new residential structures and modern commercial buildings and 0.2 in/sec PPV for historic and older buildings. Therefore, a potentially significant vibration impact related to structural damage could occur when pile driving is proposed within 50 feet of a historic building. Thus, mitigation is recommended to reduce potential construction vibration impacts related to pile driving.

Vibration levels can also result in interference or annoyance impacts for residences or other land uses where people sleep, such as hotels and hospitals. The FTA methodology for vibration annoyance is dependent on the frequency of the events. When vibration events occur more than 70 times per day, as is typically the case with pile driving, they are considered "frequent events." Frequent events in excess of 72 VdB are considered to result in a significant vibration impact. However, the prohibited construction hours within the City's Ordinance are sufficient to avoid sleep interference impacts during times that most people sleep.

Land Use Compatibility

As discussed above, exterior noise levels in Seattle close to highways, freeways, and high traffic roadways can exceed 65 dBA L_{dn}. The 65 dBA L_{dn} noise level is important because it represents the exterior noise level which can be reduced to 45 dBA L_{dn} using standard construction techniques. An interior noise level of 45 L_{dn} is the commonly accepted maximum interior noise level for residential uses (HUD 2023). Most alternatives seek to locate residential uses near transit or highly traveled roadways to reduce vehicle miles traveled within the city. As indicated in **Exhibit 3.5-8** through **Exhibit 3.5-10** and **Exhibit 3.5-14**, new sensitive receptors (e.g., residential uses) could be located within noise contours up to 65 dBA L_{dn} (or greater) due to proximity to roadway, rail, and airport noise sources. Consequently, if residences or other noise-sensitive land uses are located in close proximity to major roadways or freeways or noise-generating industrial operations, additional insulation, window treatments, or noise abatement features may be warranted to reduce interior noise levels to acceptable levels. On the other hand, if an active industrial development is proposed adjacent to noise-sensitive land uses, noise compatibility problems could also arise. The potential for future or current to experience roadway noise or stationary noise from industrial or other noise-generating developments would be a potential moderate noise impact and mitigation measures could be considered.

As discussed below, traffic noise levels for all alternatives would increase by less than 1.5 dBA along all roadway segments modeled roadways. Outside of the laboratory, a 3-dBA change is considered a just-perceivable difference, and a 5-dBA change is clearly perceptible and is typically considered substantial. Consequently, an increase of less than 1.5 dBA would be considered a minor impact on environmental noise. While the traffic noise impacts would not be discernible from background noise levels, all of the alternatives are anticipated to result in a cumulative noise increase from stationary sources (e.g., mechanical equipment, parking lot noise, conversations, etc.) due to the intensity, scale, and nature of development associated with these alternatives. Noise increases from the alternatives could worsen noise levels in some areas that experience high noise levels under existing conditions that are considered healthy for residential and other sensitive uses. However, noise levels from stationary sources would be required to comply with the exterior sound level limits outlined in the City's Noise Ordinance (SMC Chapter 25.08). Following compliance with the City's Noise Ordinance, stationary noise source impacts from all alternatives would not be significant.

130th/145th Station Areas

Operational noise impacts to sensitive receptors in the Station Area were evaluated in the Sound Transit Lynwood Link Extension Final Environmental Impact Statement (Sound Transit, 2015) (Lynwood Link Extension Final EIS) and SR 522 Bus Rapid Transit (BRT) SEPA Environmental Checklist (SR 522 BRT SEPA Checklist). According to the Lynwood Link Extension Final EIS and SR 522 BRT SEPA Checklist, operational noise levels from BRT buses at the 145th Station, and light rail pass-bys along the Lynwood Link Extension would result in unnoticeable changes in ambient noise at sensitive receptors in the Station Area. In addition, sound walls are proposed to the south of the 130th Street Station along the northbound I-5/Lynwood Link Extension line that would reduce transit and highway traffic noise levels at existing and future residential receptors.

Construction noise impacts were also evaluated in the Lynwood Link Extension Link Final EIS and SR 522 BRT SEPA Checklist. According to the construction noise analyses in these documents, some construction activities may exceed 80 dBA at residences closest to the Station Area construction sites. In addition, some construction activities might be required during nighttime hours because of the nature of the construction, to avoid daytime traffic impacts, or to accommodate adjacent land uses. Nighttime construction would require a noise variance from the City in order to proceed. Construction noise impacts and mitigation measures were identified for sensitive receptors closest to the stations and rail alignment areas in the Lynwood Link Extension Link Final EIS and SR 522 BRT SEPA Checklist. The One Seattle Comprehensive Plan would not result in additional construction noise impacts in the Station Area than those already identified in these environmental documents.

Equity & Climate Vulnerability Considerations

Exposure to Noise Pollution

Future growth and development patterns under Comprehensive Plan growth strategies would affect future residences' (or other "sensitive receptors" or "sensitive receivers) relationships to mobile and stationary noise sources. The degree of potential for adverse impacts on new sensitive receptors would depend on proximity to major sources of noise and the density of future sensitive development.

Portions of Seattle located along major roadways (freeways and the most-traveled highways) are exposed to relatively high noise levels. The U.S. Department of Housing and Urban Development (HUD) utilizes a screening distance of 1,000 feet of highways or major roadways, 3,000 feet for railroads, and 15 miles for FAA-regulated airfields to evaluate transportation noise effects at sensitive receivers. These distances represent the approximate minimum distance at which a "Normally Acceptable" noise level of 65 dBA L_{dn} is achieved in proximity to the aforementioned transportation noise sources (HUD 2023). Because the authority to set noise standards for off-road and other non-highway vehicles lies with the Washington State

Department of Ecology, and for locomotives with the Federal Rail Administration (FRA), the only strategies available to the City for consideration are related to reducing exposure. Measures such as setbacks for residential and other sensitive land uses from major traffic corridors and rail lines are effective. Other methods to protect sensitive land uses from being exposed to substantial transportation noise levels include noise abatement and insulation requirements for new sensitive uses, and site design measures to block or obstruct transportation noise sources from residences.

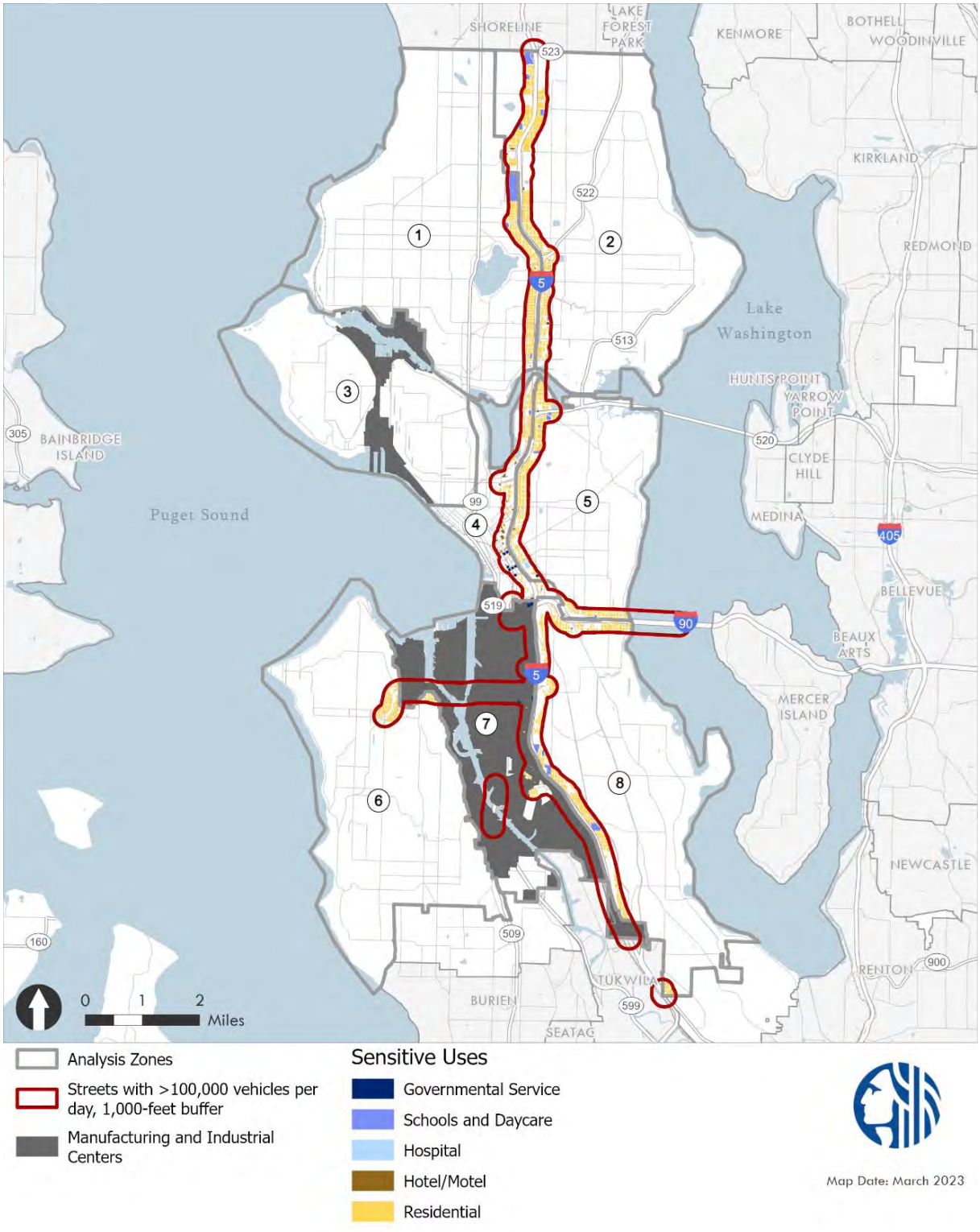
Portions of Seattle are also exposed to elevated stationary noise sources from industrial uses and ports where ships, heavy trucks, and mechanical equipment can result in increased noise levels at sensitive uses. This is considered a moderately adverse noise impact. The City has identified measures to reduce potential noise compatibility conflicts from industrial/maritime centers and noise-sensitive receivers through mitigation measures identified in the Seattle Industrial and Maritime Lands Final EIS (2022). Potential mitigation includes installing noise barriers, siting truck haul routes away from noise sensitive areas, and using green open spaces as noise buffers.

Exhibit 3.5-14 shows a 1,000-feet buffer around roadways and highways with daily trips greater than 100,000 vehicles. This shows that existing uses along Interstate 5 (I-5) north of Interstate 90 (I-90) consist primarily of residential uses, within 1,000 feet of transportation noise sources. **Exhibit 3.5-9** above shows a 3,000-foot buffer around above ground freight railways, which also indicates that residences are the primary noise-sensitive land use near freight railways.

This potential increased exposure to transportation noise is considered a potential moderate adverse impact.

To address the impact, the City could consider risk-reducing mitigation strategies such as setbacks for residential and other sensitive land uses from major traffic corridors, rail lines, port terminals, and similar sources of transportation and stationary noise, and/or to identify measures for sensitive receptors proposed to be in areas near such sources such as upgraded windows treatments, noise barriers, and noise insulation design features.

Exhibit 3.5-14 1,000-Feet Buffer Around Freeways and Roadways with Greater than 100,000 Daily Vehicles



Source: Kimley Horn, 2023.

Impacts of Alternative 1: No Action

Future development under Alternative 1 would result in increased vehicle traffic on roadways throughout the Seattle area. To quantify the degree of noise increases, traffic noise was modeled to assuming an annual growth rate of VMT of 0.37%, consistent with the transportation analysis. Resultant noise levels are presented in **Exhibit 3.5-15** and compared to existing conditions at the same roadside distance, 150 feet from the roadway center for major roadways throughout the city. As shown in **Exhibit 3.5-15**, Alternative 1 would result in traffic noise increases ranging from 0.1 dBA L_{dn} to 1.0 dBA L_{dn} and would not result in a significant (10 dBA or more) dBA noise increase.

Exhibit 3.5-15. Modeled Noise (L_{dn}) Levels at 150 Feet From the Roadway Center—Alternative 1, No Action (2044)

Roadway	Roadway Segment	Existing	2044 Alt. 1	dBA Difference Over Existing	Significant Increase?
Martin Luther King Jr Way S	Between S Jackson St and S Massachusetts St	58.4	59.4	1.0	No
	Between S Orcas St and S Graham St	59.7	60.6	0.9	No
Harbor Ave SW/Alki Ave	Between SW Admiral Way and California Way SW	57.5	57.9	0.4	No
Beacon Ave S	Between S Spokane St and S Columbian Way	54.8	55.2	0.4	No
34th Ave W	Between W Barrett St and W McGraw St	54.3	54.7	0.4	No
Roosevelt Way NE	Between NE Northgate Way and 80th St	56.7	57.0	0.3	No
Roosevelt Way NE	Between 5th Ave NE and 10th Ave NE	60.9	61.0	0.1	No
15th Ave NE	Between NE 135th St and NE 145th St	58.9	59.8	0.9	No

Notes: Road center to receptor distance is assumed to be 150 feet for values shown in this table. Noise levels were determined using the Federal Highway Administration (FHWA) traffic noise model. The average speed on these segments is assumed to be the posted speed for each roadway.
Source: Kimley-Horn, 2023

Equity & Climate Vulnerability Considerations

As shown in **Exhibit 3.2-8** in **Section 3.2 Air Quality & GHG Emissions**, Alternative 1 would locate several urban centers and urban villages within 1,000-feet of roadways with greater than 100,000 daily vehicles. Collectively these urban centers and villages represent 56% of all projected residential growth in the city through 2044. Only a portion of each center or village is within the 1,000-feet buffer, so the potentially affected portion of the new residents would be smaller. Compared to all other alternatives, the number of units within the affected urban centers and villages would be the lowest (same as Alternative 3 and 4).

130th/145th Station Areas

Under Alternative 1, the current Comprehensive Plan and zoning designations would remain. Development around the 130th/145th Station Area would primarily be comprised of three-story single-purpose residential and some 4-8 story multifamily uses. The 130th/145th Station area would experience minimal traffic noise increases and stationary source noise levels (e.g., HVAC systems, parking noise, conversations, and other noise sources typical of urban areas) could increase, although not substantially due to the proximity to I-5, 145th Street, and other traffic noise sources that dominate the existing noise environment.

Impacts of Alternative 2: Focused

Development under Alternative 2 would result in increased vehicle traffic on roadways throughout the Seattle area. To quantify the degree of noise increases, traffic noise was modeled to assuming an annual growth rate of VMT of 0.43%, consistent with the transportation analysis. Resultant noise levels are presented in **Exhibit 3.5-16** and compared to existing conditions at the same roadside distance, 150 feet from the roadway center for major roadways throughout the city. As shown in **Exhibit 3.5-16**, Alternative 2 would result in traffic noise increases ranging from 0.4 dBA L_{dn} to 1.1 dBA L_{dn} and would not result in a significant (10 dBA or more) dBA noise increase. It should also be noted that the traffic noise levels shown in **Exhibit 3.5-16** would result in a minimal increase when compared to the No Action alternative (Alternative 1).

Exhibit 3.5-16. Modeled Noise (L_{dn}) Levels at 150 Feet From the Roadway Center—Alternative 2 (2044)

Roadway	Roadway Segment	Existing	2044 Alt. 2	dBA Difference Over Existing	Significant Increase?
Martin Luther King Jr Way S	Between S Jackson St and S Massachusetts St	58.4	59.5	1.1	No
	Between S Orcas St and S Graham St	59.7	60.6	0.9	No
Harbor Ave SW/Alki Ave	Between SW Admiral Way and California Way SW	57.5	57.9	0.4	No
Beacon Ave S	Between S Spokane St and S Columbian Way	54.8	55.4	0.6	No
34th Ave W	Between W Barrett St and W McGraw St	54.3	55.1	0.8	No
Roosevelt Way NE	Between NE Northgate Way and 80th St	56.7	57.4	0.7	No
Roosevelt Way NE	Between 5th Ave NE and 10th Ave NE	60.9	61.3	0.4	No
15th Ave NE	Between NE 135th St and NE 145th St	58.9	60.0	1.1	No

Notes: Road center to receptor distance is assumed to be 150 feet for values shown in this table. Noise levels were determined using the Federal Highway Administration (FHWA) traffic noise model. The average speed on these segments is assumed to be the posted speed for each roadway.
Source: Kimley-Horn, 2023.

Equity & Climate Vulnerability Considerations

In addition to the regional centers and villages that would be within the 1,000-feet buffer under Alternative 1, Alternative 2 would place additional neighborhood center units within the buffer, as shown in **Exhibit 3.2-10** in **Section 3.2 Air Quality & GHG Emissions**. Included in the additional units is the 130th/145th Station Area. Although a greater number of units would be closer to transportation noise sources and thus at higher risk than under Alternative 1, overall units within these regional centers, urban centers, and neighborhood centers consists of 46% of overall projected growth, which is higher than that of Alternative 1. Only a portion of each center is within the 1,000-feet buffer, so the potentially affected portion of the new residents would be smaller. Alternative 2 would place a greater number of units within the 1,000-foot buffer when compared to Alternative 1, 3, and 4, but fewer units compared to Alternative 5 and the Preferred Alternative.

130th/145th Station Areas

Under Alternative 2, the 130th/145th Station Area would be designated as neighborhood center and would include a mix of low-rise residential, midrise residential, and neighborhood commercial uses. The 130th/145th Station area would experience some traffic noise increases and stationary source noise levels could increase, although not substantially due to the proximity to I-5, 145th Street, and other traffic noise sources that dominate the existing noise environment. It is also noted that Alternative 2 would site residents and commercial/retail uses near transit hubs, which would likely reduce traffic and traffic noise levels associated with increased development in the area.

Impacts of Alternative 3: Broad

Development under Alternative 3 would result in increased vehicle traffic on roadways throughout the Seattle area. To quantify the degree of noise increases, traffic noise was modeled to assuming an annual growth rate of VMT of 0.41%, consistent with the transportation analysis. Resultant noise levels are presented in **Exhibit 3.5-17** and compared to existing conditions at the same roadside distance, 150 feet from the roadway center for major roadways throughout the city. As shown in **Exhibit 3.5-17**, Alternative 3 would result in traffic noise increases ranging from 0.5 dBA L_{dn} to 1.1 dBA L_{dn} and would not result in a significant (10 dBA or more) dBA noise increase. It should also be noted that the traffic noise levels shown in **Exhibit 3.5-17** would result in a minimal increase when compared to the No Action alternative (Alternative 1).

Exhibit 3.5-17. Modeled Noise (L_{dn}) Levels at 150 Feet From the Roadway Center—Alternative 3 (2044)

Roadway	Roadway Segment	Existing	2044 Alt. 3	dBA Difference Over Existing	Significant Increase?
Martin Luther King Jr Way S	Between S Jackson St and S Massachusetts St	58.4	59.4	1.0	No
	Between S Orcas St and S Graham St	59.7	60.7	1.0	No
Harbor Ave SW/Alki Ave	Between SW Admiral Way and California Way SW	57.5	57.9	0.4	No
Beacon Ave S	Between S Spokane St and S Columbian Way	54.8	55.6	0.8	No
34th Ave W	Between W Barrett St and W McGraw St	54.3	55.0	0.7	No
Roosevelt Way NE	Between NE Northgate Way and 80th St	56.7	57.5	0.8	No
Roosevelt Way NE	Between 5th Ave NE and 10th Ave NE	60.9	61.4	0.5	No
15th Ave NE	Between NE 135th St and NE 145th St	58.9	60.0	1.1	No

Notes: Road center to receptor distance is assumed to be 150 feet for values shown in this table. Noise levels were determined using the Federal Highway Administration (FHWA) traffic noise model. The average speed on these segments is assumed to be the posted speed for each roadway.
Source: Kimley-Horn, 2023.

Equity & Climate Vulnerability Considerations

As shown in **Exhibit 3.2-12** in **Section 3.2 Air Quality & GHG Emissions**, the regional centers and villages within the 1,000-feet buffer under Alternative 3 would be the same as Alternative 1, collectively representing 56% of all projected residential growth in the city through 2044. Only a portion of each center or village is within the 1,000-feet buffer, so the potentially affected portion of the new residents would be smaller. A greater proportion of city-wide growth would be located in close proximity to transportation-related noise sources when compared to Alternative 2. Alternative 3 would place the fewest number of units (the same as Alternative 1 and 4) within the 1,000-foot buffer when compared to Alternative 2 and 5 and the Preferred Alternative.

130th/145th Station Areas

The station area plan would not be implemented under Alternative 3; the area would grow based on the applicable citywide place types.

Impacts of Alternative 4: Corridor

The planned housing and job totals are similar in Alternative 4 as for Alternative 3, and traffic associated with Alternative 4 would be similar to (or less than) Alternative 3. For the purposes of this analysis, the traffic noise levels and increases from Alternative 3 also apply to

Alternative 4. Therefore, traffic noise level increases from Alternative 4 would not be significant (10 dBA or more) as discussed above.

Alternative 4 would focus more growth near transit and major highways/roadways than Alternatives 1 through 3. Due to the density of development near major transportation noise sources, the potential for noise compatibility issues from Alternative 4 is profound, and a moderately adverse noise impact would occur. However, implementation of mitigation measures would reduce this noise impact as discussed below.

Equity & Climate Vulnerability Considerations

As shown in **Exhibit 3.2-14** in **Section 3.2 Air Quality & GHG Emissions**, the regional centers and villages within the 1,000-feet buffer under Alternative 4 would be the same as Alternative 1 and Alternative 3, collectively representing 56% of all projected residential growth in the city through 2044. Only a portion of each center or village is within the 1,000-feet buffer, so the potentially affected portion of the new residents would be smaller. A greater proportion of city-wide growth would be located in close proximity to transportation-related noise sources when compared to Alternative 2. Alternative 4 would place the fewest number of units (the same as Alternatives 1 and 3) within the 1,000-foot buffer when compared to Alternative 2 and 5 and the Preferred Alternative.

130th/145th Station Areas

The station area plan would not be implemented under Alternative 4; the area would grow based on the applicable citywide place types.

Impacts of Alternative 5: Combined

Development under Alternative 5 would result in increased vehicle traffic on roadways throughout the Seattle area. To quantify the degree of noise increases, traffic noise was modeled to assuming an annual growth rate of VMT of 0.51%, consistent with the transportation analysis. Resultant noise levels are presented in **Exhibit 3.5-18** and compared to existing conditions at the same roadside distance, 150 feet from the roadway center for major roadways throughout the city. As shown in **Exhibit 3.5-18**, Alternative ~~3~~5 would result in traffic noise increases ranging from 0.5 dBA L_{dn} to 1.3 dBA L_{dn} and would not result in a significant (10 dBA or more) dBA noise increase. It should also be noted that the traffic noise levels shown in **Exhibit 3.5-18** would result in a minimal increase when compared to the No Action Alternative (Alternative 1).

Exhibit 3.5-18. Modeled Noise (L_{dn}) Levels at 150 Feet From the Roadway Center—Alternative 5 (2044)

Roadway	Roadway Segment	Existing	2044 Alt. 5	dBA Difference Over Existing	Significant Increase?
Martin Luther King Jr Way S	Between S Jackson St and S Massachusetts St	58.4	59.5	1.1	No
	Between S Orcas St and S Graham St	59.7	60.8	1.1	No
Harbor Ave SW/Alki Ave	Between SW Admiral Way and California Way SW	57.5	58.0	0.5	No
Beacon Ave S	Between S Spokane St and S Columbian Way	54.8	55.8	1.0	No
34th Ave W	Between W Barrett St and W McGraw St	54.3	55.0	0.7	No
Roosevelt Way NE	Between NE Northgate Way and 80th St	56.7	57.5	0.8	No
Roosevelt Way NE	Between 5th Ave NE and 10th Ave NE	60.9	61.5	0.6	No
15th Ave NE	Between NE 135th St and NE 145th St	58.9	60.2	1.3	No

Notes: Road center to receptor distance is assumed to be 150 feet for values shown in this table. Noise levels were determined using the Federal Highway Administration (FHWA) traffic noise model. The average speed on these segments is assumed to be the posted speed for each roadway.
Source: Kimley-Horn, 2023.

The growth strategy of Alternative 5 would result in a ~~the~~ dens~~est~~er concentration of sensitive uses near major highways/roadways, transit facilities, and industrial/maritime uses compared to Alternatives 1 through 4. Alternative 5 would result in less dense concentration of sensitive uses near major noise sources compared to the Preferred Alternative. ~~As a result, the highest conflict of noise and land use compatibility would occur with implementation of Alternative 5, and a~~ A moderately adverse noise impact would occur. However, implementation of mitigation measures would reduce this noise impact as discussed below.

Equity & Climate Vulnerability Considerations

This alternative would place the emphasis for growth near transit centers, with the 130th Street station designated as an urban center. In addition, additional neighborhood center units would be located in close proximity to transportation-related noise sources as shown in **Exhibit 3.2-16** in **Section 3.2 Air Quality & GHG Emissions**. Consistent across all alternatives, the highest amount of projected growth would be within the Downtown Regional Center and First Hill/Capitol Hill Regional Center. Alternative 5 and the Preferred Alternative have~~s~~ the highest housing studied growth ~~target~~ among the ~~five~~ alternatives. Although Alternative 5 and the Preferred Alternative would have the same housing growth assumption, the allocation of growth differs.

As a result, the proportion of city-wide growth that would be located in close proximity to transportation-related noise sources is the lowest (39%) under this alternative while the total amount of collective growth would be the greatest. Only a portion of each center or village is within the 1,000-feet buffer, so the potentially affected portion of the new residents would be smaller. Alternative 5 would place a greater~~the greatest~~ number of units within the 1,000-foot buffer when compared to Alternatives 1 through 4 and would place fewer units within the 1,000-foot buffer when compared to the Preferred Alternative~~the other alternatives~~.

130th/145th Station Area

Noise impacts at the Station Area would be most substantial under Alternative 5, which includes the strategies for encouraging housing growth in Alternatives 2, 3, and 4 plus some additional changes to existing regional center and urban center boundaries and changes to place type designations. Under this alternative, an urban center would be created on both the west and east sides of I-5 at the Sound Transit light rail station. As a result, the 130th/145th Station Area would experience higher traffic noise and stationary source noise increases than Alternatives 1 through 4 and the Preferred Alternative.

Impacts of Preferred Alternative

Note: The impacts analysis for the Preferred Alternative was added since the Draft EIS.

Development under the Preferred Alternative would result in increased vehicle traffic on roadways throughout the Seattle area. To quantify the degree of noise increases, traffic noise was modeled assuming an annual growth rate of VMT of 0.51%, consistent with the transportation analysis. Resultant noise levels are presented in **Exhibit 3.5-19** and compared to existing conditions at the same roadside distance, 150 feet from the roadway center for major roadways throughout the city. As shown in **Exhibit 3.5-19**, the Preferred Alternative would result in traffic noise increases ranging from 1.0 dBA L_{dn} to 2.4 dBA L_{dn} and would not result in a significant (10 dBA or more) dBA noise increase. Note that traffic noise would be reduced under the Preferred Alternative along 15th Avenue NE between NE 135th Street and NE 145th Street. It should also be noted that the traffic noise levels shown in **Exhibit 3.5-19** would result in a minimal increase when compared to the No Action Alternative (Alternative 1).

Exhibit 3.5-19. Modeled Noise (L_{dn}) Levels at 150 Feet From the Roadway Center—Preferred Alternative (2044)

Roadway	Roadway Segment	Existing	2044 Preferred Alt	dBA Difference Over Existing	Significant Increase?
Martin Luther King Jr Way S	Between S Jackson St and S Massachusetts St	58.4	59.7	1.3	No
	Between S Orcas St and S Graham St	59.7	60.9	1.2	No
Harbor Ave SW/Alki Ave	Between SW Admiral Way and California Way SW	57.5	58.6	1.1	No
Beacon Ave S	Between S Spokane St and S Columbian Way	54.8	57.2	2.4	No
34th Ave W	Between W Barrett St and W McGraw St	54.3	55.8	1.5	No
Roosevelt Way NE	Between NE Northgate Way and 80th St	56.7	58.3	1.6	No
Roosevelt Way NE	Between 5th Ave NE and 10th Ave NE	60.9	61.9	1.0	No
15th Ave NE	Between NE 135th St and NE 145th St	58.9	58.7	-0.2	No

Notes: Road center to receptor distance is assumed to be 150 feet for values shown in this table. Noise levels were determined using the Federal Highway Administration (FHWA) traffic noise model. The average speed on these segments is assumed to be the posted speed for each roadway.
Source: Kimley-Horn, 2024.

The growth strategy of Preferred Alternative would result in the densest concentration of sensitive uses near major highways/roadways, transit facilities, and industrial/maritime uses. As a result, the Preferred Alternative has the highest conflict of noise and land use compatibility and would result in a moderately adverse noise impact. However, implementation of mitigation measures would reduce this noise impact as discussed below.

Equity & Climate Vulnerability Considerations

This alternative would place the emphasis for growth near transit centers, with the 130th Street station designated as an urban center. In addition, additional neighborhood center units would be located in close proximity to transportation-related noise sources as shown in **Exhibit 3.2-18** in **Section 3.2 Air Quality & GHG Emissions**. Consistent across all alternatives, the highest amount of projected growth would be within the Downtown Regional Center and First Hill/Capitol Hill Regional Center. The Preferred Alternative has the highest housing growth compared to Alternatives 1 through 4 and would be the same as Alternative 5. As a result, the proportion of citywide growth that would be located in close proximity to transportation-related noise sources is the lowest (40%) under this alternative while the total amount of collective growth would be the greatest. Only a portion of each center or village is within the 1,000-feet buffer, so the potentially affected portion of the new residents would be smaller. The Preferred Alternative would place the greatest number of units within the 1,000-foot buffer when compared to the other alternatives.

130th/145th Station Area

Noise impacts at the Station Area would be substantial under the Preferred Alternative, less than only Alternative 5, which includes the strategies for encouraging housing growth in Alternatives 2, 3, and 4 plus some additional changes to existing regional center and urban center boundaries and changes to place type designations. Under this alternative, an urban center would be created on both the west and east sides of I-5 at the Sound Transit light rail station. As a result, the 130th/145th Station Area would experience higher traffic noise and stationary source noise increases than Alternatives 1 through 4 and less than Alternative 5.

3.5.3 Mitigation Measures

Incorporated Plan Features

The City will update its Comprehensive Plan policies for land use, transportation, and others with an opportunity to increase noise compatibility with sensitive receptors in proximity to significant transportation and industrial noise sources.

Regulations & Commitments

City noise regulations establish exterior sound level limits for various land use zones with the limits varying depending on the source zone and the receiving zone (**Exhibit 3.5-5**). These limits are intended to result in acceptably low interior noise levels for residences and other sensitive noise receptors. City noise regulations also address construction noise, limiting the times during the day when construction noise, both impact and non-impact, can exceed exterior noise limits (**Exhibit 3.5-6**).

Other Potential Mitigation Measures

Measures to Reduce Construction-Related Noise and Vibration Impacts

In addition to restrictions on the hours of construction in accordance with the Seattle Noise Ordinance, other mitigation that could be applied includes:

- Installing barriers to shield noise sensitive receptors and enclosing stationary work
- Selecting haul routes to avoid noise sensitive areas
- Using fully baffled compressors, or preferably electric compressors
- Using fully mufflered construction equipment
- Use low-noise emission equipment
- Monitor and maintain equipment to meet noise limits
- Prohibit aboveground jack hammering and impact pile driving during nighttime hours.

To reduce potential moderate adverse noise impacts from impact pile driving activities adjacent to noise-sensitive land uses (within 50 feet) or moderate adverse vibration impacts to historic structures, the One Seattle Comprehensive Plan could consider adoption of a policy recommending the Seattle Noise Ordinance be updated to require best practices for noise control, including "quiet" pile-driving technology (such as pre-drilling of piles, use of sonic or vibratory drivers instead of impact pile drivers, where feasible); and using temporary sound walls or cushion blocks to dampen impact noise from pile driving).

Measures to Reduce Land Use Compatibility Noise Impacts

Although mitigation measures are not required due to a lack of significant adverse impact findings, to reduce the potential for exposure of residences and other noise-sensitive land uses to incompatible environmental noise, the One Seattle Plan could consider adoption of a policy that recommends that residences and other noise-sensitive land uses (i.e., schools, day care) be separated from freeways, railways, ports, and other active industrial facilities where exterior noise environments exceed 65 dBA L_{dn}. If sensitive land uses are proposed in such areas, a policy addressing the need for additional mitigation strategies could be considered to achieve an interior noise performance standard of 45 dBA L_{dn}. The types of implementation measures that could help to accomplish this include:

- Coordination with WSDOT on sound wall construction where major highways pass through residential areas.
- Use of appropriate building materials such as walls and floors with an STC rating of 50 or greater as necessary to achieve this performance standard.
- Site design measures, including use of window placement to minimize window exposure toward noise sources, avoid placing balcony areas in high noise areas, and use of buildings as noise barriers.
- Use of acoustically rated building materials (insulation and windows).

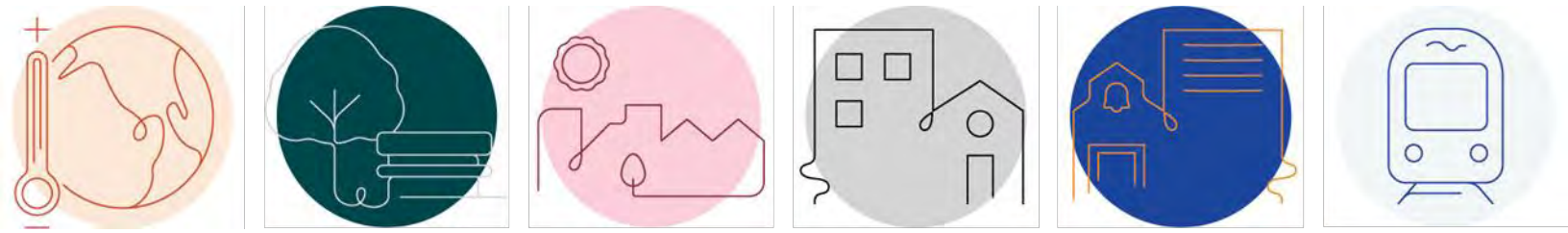
In addition, zoning land use criteria or boundaries could be established, while meeting other planning goals, to limit the proximity of new residential development to known or anticipated sources of high noise levels.

3.5.4 Significant Unavoidable Adverse Impacts

Under all studied alternatives, increased residential and employment growth could result in increased traffic volumes, though the resulting noise increases are not anticipated to exceed 3dBA, the threshold of change that is perceptible. The location of noise sensitive receivers (e.g., residential uses) near traffic, rail, or industrial noise sources could occur under all alternatives, particularly Alternatives 4 and 5 and the Preferred Alternative. Implementation of residential noise mitigation described in the previous subsection should adequately reduce noise experienced by noise-sensitive receivers. With the application of mitigation measures described above, no significant unavoidable adverse noise impacts would occur under any of the alternatives.

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3.6 Land Use Patterns & Urban Form





Source: City of Seattle, 2023.

This section summarizes the affected environment—including the current policy and regulatory frameworks, current land and shoreline uses, physical form, and views—and compares impacts of the alternatives on land use patterns and urban form in the city. The analysis focuses on changes in activity levels and compatibility of change in land use and shoreline patterns, as well as potential changes to physical conditions and views. This includes a review of land use patterns and compatibility, urban form (height, bulk scale, transitions, and tree canopy), shadows, and views in the study area and at the analysis area level (where applicable) as well as resulting equity and climate vulnerability considerations. Details of the thresholds of significance are shared in **Section 3.6.2**. Mitigation measures and a summary of any significant unavoidable adverse impacts are included following the impacts analysis.

3.6.1 Affected Environment

This section begins with a discussion of the historical context of planning and land use decisions in Seattle. This is followed by a summary of the existing policy and regulatory frameworks—including policies and regulations regarding the height, bulk, and scale of development as well as shadows, and public views—and the resulting general development patterns citywide and by analysis area. The summary addresses land use patterns and development character in Seattle and provides a baseline for analyzing the impacts of the alternative growth scenarios. **Section 3.7 Relationship to Plans, Policies, & Regulations** addresses related topics in greater detail, including the Washington State Growth Management Act (GMA), PSRC's VISION 2050 and Multi-County Planning Policies (MPPs), King County's County-Wide Panning Policies (CPPs), and the City's current Comprehensive Plan.

Overview of Historical Planning & Land Use Decisions

The study area was inhabited extensively by Coast Salish peoples for thousands of years prior to the presence of White settlers in the region. Before European contact, the region was one of the most populated centers in North America. The Indians of the Eastern Puget Sound lived in relatively small, autonomous villages and spoke variations of Lushootseed (*txʷəlšucid*, *dxʷləšúcid*), one of the Coast Salish languages. Many tribes were affiliated through intermarriage, political agreement, trade, and material culture. Indigenous people lived in permanent villages of longhouses or winter houses, and traditionally left their winter residences in the spring, summer, and early fall in family canoes to travel to temporary camps at fishing, hunting, and gathering grounds. At the time of the first White settlements around 1850, natives were living in more than 90 longhouses in at least 17 villages in modern-day Seattle.

This section incorporates evaluation written by City staff from the 2022 Seattle Industrial and Maritime Strategy Final EIS. Additional context was added here to expand the discussion citywide beyond industrial and maritime areas.

See **Section 3.9 Cultural Resources** for a more detailed history of indigenous and non-indigenous people in Seattle as well as an overview of historic, archaeological, and other cultural resources in the study area.

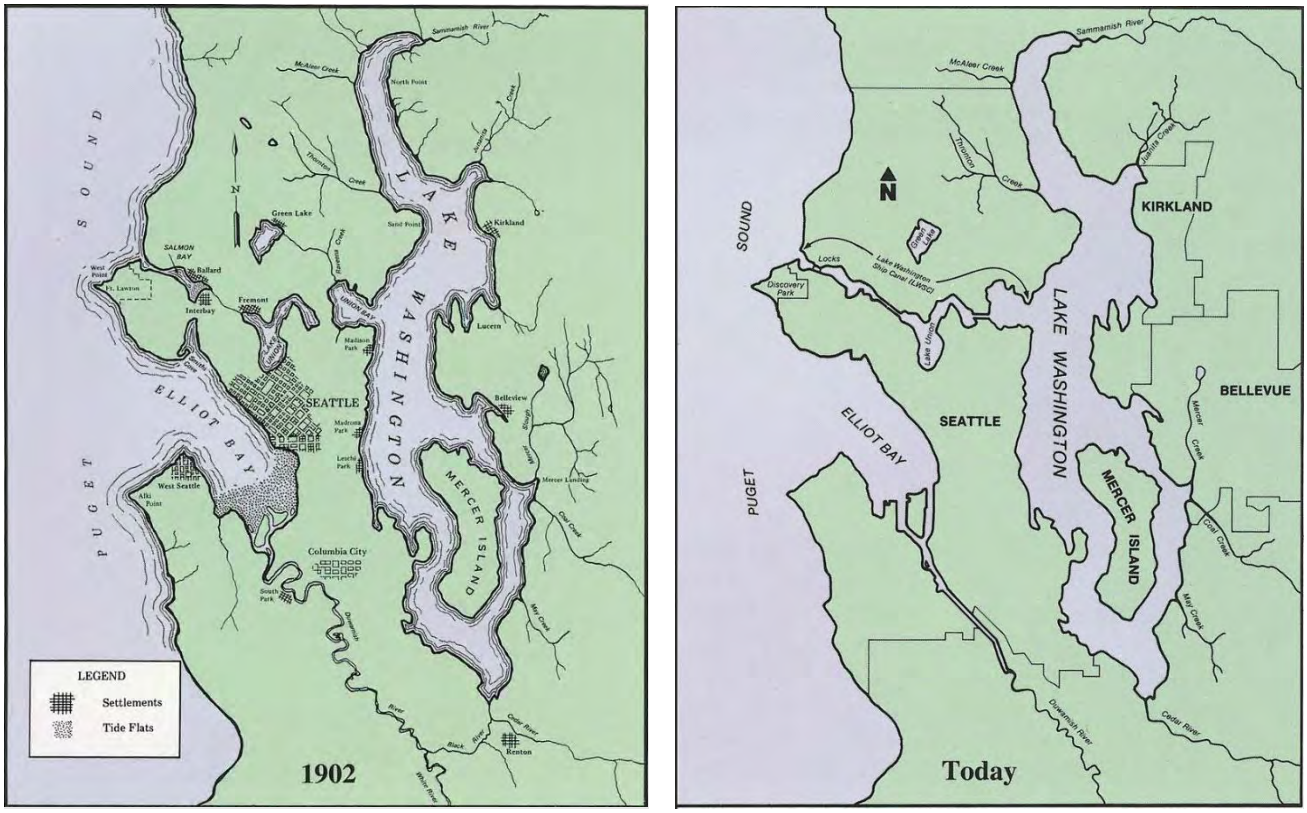
Waterways were central to the cultures and livelihoods of native people. "Duwamish" is the Anglo-Europeanized word which meant "people of the inside", *dxʷdəwʔabš*, referencing the interior waters of the Duwamish, Black and Cedar rivers. The Suquamish take their name from the Lushootseed phrase for “people of the clear salt water”, and the people living around Lake Washington were collectively known as *hah-choo-AHBSH* or *hah-chu-AHBSH* or *Xacuabš*, People of *HAH-choo* or *Xachu*, "People of a Large Lake" or "Lake People."

Early Alterations to Seattle’s Lands & Waterways

Seattle was incorporated in 1869, eighteen years after the first white settlers arrived. Physical alteration of the land and waterways by white settlers is important context for a discussion of land use today. Seattle’s land and waterways looked very different prior to construction of the Lake Washington ship canal and other alterations. A series of separate lakes that natives transited with over-land portages, for example, were previously in the location of present day Lake Union. The Lushootseed name for present day Lake Union was *tenas Chuck* or *XáXu7cHoo* ("small great-amount-of-water"), present day Lake Washington was called *hyas Chuck* or *Xacuabš* ("great-amount-of-water"), and the present-day area of the Montlake Cut was called "Carry a Canoe."

Early development viewed Seattle’s topography as an obstacle to growth. Construction on a system of locks and cut waterways connecting east to west began in 1911 and culminated in 1916 (see **Exhibit 3.6-1**). Waters were connected from Lake Washington’s Union Bay to Lake Union to Salmon Bay though a series of locks to Shilshole Bay. Lake Washington’s waters were partially drained as a result, lowering the level of the lake by 8.8 feet and drying up more than 1,000 acres of wetlands. Construction of the ship canal and locks resulted in further changes to rivers flows at the south end of Lake Washington. Prior to the alterations, Lake Washington emptied from its south end into the Black River (which no longer exists). The Black River is connected to the Duwamish River, which outlets as it does today to Elliott Bay. The Cedar River—which had previously flowed into the Black River in Renton—was diverted in 1912 directly into the south end of Lake Washington to reduce flooding in Renton. The remaining portion of the Black River dried up in 1916 when Lake Washington’s level dropped. Several Indigenous villages were located near the confluence of the Black and Duwamish rivers and the area was long used as a place of refuge. When the Black River vanished, native people were displaced from the area.

Exhibit 3.6-1. Seattle's Shoreline Over Time



Source: Burke Museum, The Waterlines Project, 2009.

The Great Seattle Fire of 1889 prompted a vigorous period of rebuilding with more substantial, and fire-resistant materials like brick and stone. In an effort to create more buildable land for the expanding city, Seattle's city engineers began to regrade large chunks of land with hydraulic hoses. The Denny Hill regrade was one of the single largest efforts in reshaping Seattle's landscape, taking place between 1897 and 1930. Denny Hill originally topped out at about 220 feet in elevation, about half the height of hills such as Queen Anne, Capitol, and Magnolia; by the time regrading ended, the hill's high point had been lowered by more than 100 feet to create the mostly flat land now known as the Denny Regrade (**Exhibit 3.6-2**). Runoff and sediment from the Denny Regrade were primarily funneled west into Elliott Bay with some transported to the area around Pine and Olive Streets (creating the smoothed out, relatively gentle slope that now ascends past the Paramount Theater to Capitol Hill).

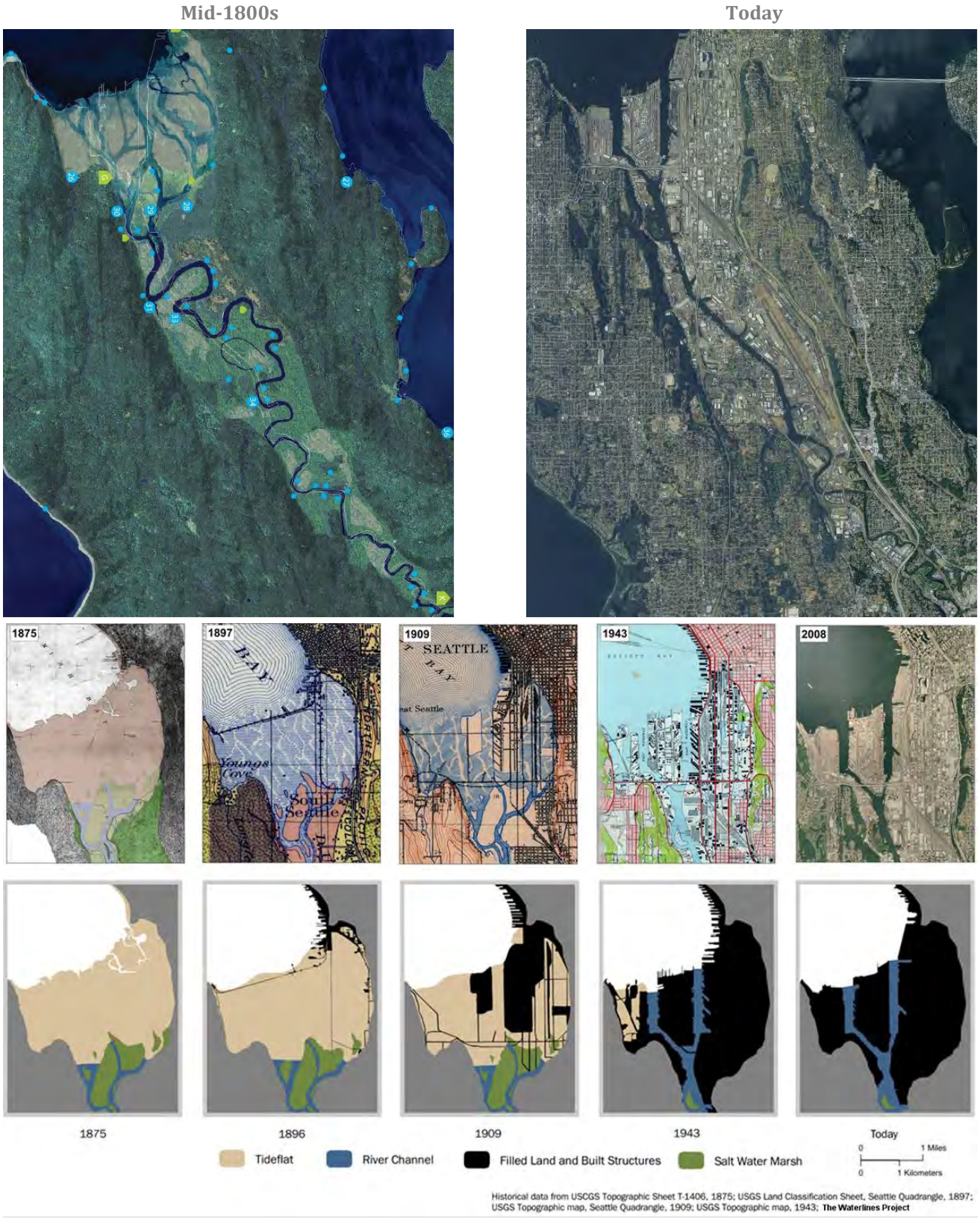
Exhibit 3.6-2. Denny Regrade Before and After, 1907-1909



Note: Regrade before and after, 2nd Avenue looking north from Pine Street, Seattle, 1907-1909
Sources: Courtesy Washington State Historical Society (1994.1.1.42) via HistoryLink.org Essay 21204.

Hundreds of acres of tide flats were filled in during the first decades of the 20th century to create dry land. After completion of the man-made Harbor Island in 1909, the mouth of the Duwamish River was divided into two channels. A subsequent series of major public works projects straightened and dredged the Duwamish riverbed, both to open the area to commercial use and to alleviate flooding. Beginning in 1913, the river was altered to remove oxbows and meanders to maintain high water flows and turning ships and by 1920, 4.5 miles of the Duwamish Waterway had been dredged to a depth of 50 feet, with 20 million cubic feet of mud and sand going into the expansion of Harbor Island. The shallow, meandering, 9-mile-long river became a 5-mile engineered waterway capable of handling ocean-going vessels and the Duwamish basin transitioned into Seattle's industrial and commercial core area. See **Exhibit 3.6-3**.

Exhibit 3.6-3. The Transformation of the Duwamish Estuary and River



Source: Burke Museum, The Waterlines Project, 2009.

Native villages on the Duwamish were completely supplanted by white settlement and commercial use through the massive alterations of the land and waterways, the destruction of wildlife and fish habitats it caused, and by the occupation of land. White settlers also deliberately removed native settlements as evidenced by burning of Indian longhouses in 1893. Duwamish people continued to work and fish in the area, using man-made "Ballast Island" on the Seattle waterfront as a canoe haul-out and informal market, but by the mid-1920s, most remnants of traditional life along the river had disappeared.

Racially Restrictive Covenants & Zoning Laws

Racially restrictive covenants came into popular use in Seattle after 1920. Covenants were used by property owners, subdivision developers, or realtors to bar the sale or rental of property to specified racial or ethnic groups. Property deeds in predominantly White neighborhoods or desirable areas of new housing development often explicitly stated that no Asian, Black, and Indian people shall be permitted to occupy the property. Seattle residential areas with restrictive covenants include but are not limited to Victory Heights, Queen Anne, Capitol Hill, Blue Ridge, and Hawthorne Hills. Such neighborhoods are located away from the city's industrial areas. By excluding all but White households from covenant-restricted residential areas, eligible locations for homes for Black, Asian, and Indigenous households were more likely to be in close proximity to industrial areas, such as Delridge, South Park, and South Beacon Hill (Honig, 2021; University of Washington, 2020).

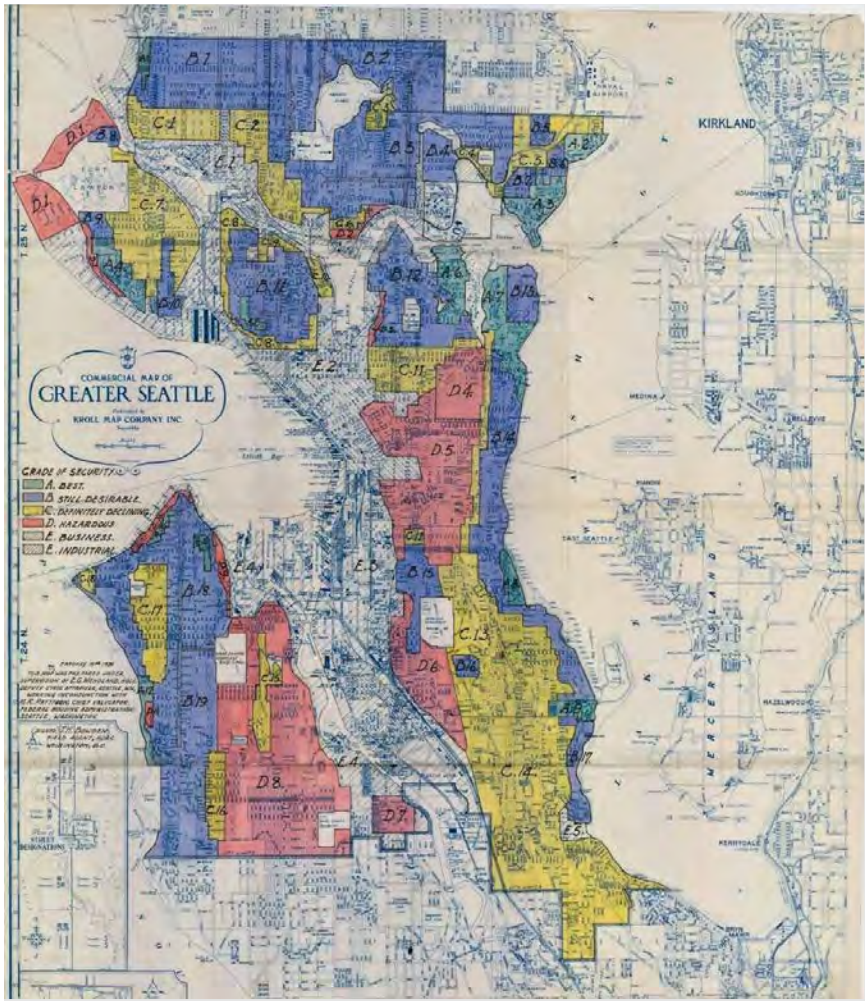
See also **Section 3.8 Population, Housing, & Employment** and the Seattle Municipal Archives (Redlining in Seattle) for more discussion of redlining and displacement.

In the late 1930s the practice of redlining was used to discriminate against racial minorities as the federal Home Owners' Loan Corporation (HOLC) evaluated mortgage risks in cities across the country. It rated neighborhoods as "best," "still desirable," "definitely declining," and "hazardous" (**Exhibit 3.6-4**). Neighborhoods with concentrations of Black, Asian, and Indian households were deemed financially risky and were marked in red so that mortgage lenders were discouraged from financing property there. The HOLC maps promoted racial inequality because it made mortgages difficult to obtain and expensive for minority households who sought to buy homes where they lived, preventing them from accumulating wealth. Additionally, lenders refused to provide mortgages for Black, Asian, and Indian households in predominantly White neighborhoods rated "best" or "still desirable." On the 1936 HOLC map of Seattle, neighborhoods adjacent to the Duwamish industrial areas including Delridge, South Park, and South Beacon Hill were rated "hazardous," while neighborhoods closely adjacent to the Ballard and Interbay industrial areas including the lower slopes of Magnolia, Queen Anne, and portions of Ballard were rated "definitely declining."

Prior to Seattle's first zoning ordinances, multifamily land uses were allowed broadly throughout the city, with no areas reserved exclusively for single-dwelling housing. Seattle's first ordinance was adopted in 1923, with a major update in 1956. Multi-family residential districts were located at the edges of rail lines, industrial districts, and manufacturing districts

as part of the 1956 update and caused environmental justice harms. These ordinances prevent new development in large areas of the city, particularly more affluent areas, and pushed multifamily to less desirable areas. The effect of this zoning was that Black, Asian, Indian, and relatively less affluent renters were exposed to noise and air quality and other impacts, while single family districts further from industrial areas were not. This pattern of multi-family housing and zoning districts bordering MICs continues to be evident today in areas including Interbay and the northeast edge of Ballard.

Exhibit 3.6-4. Commercial Map of Greater Seattle With "Grade Of Security" Designations, 1936



Source: Honig, 2021 (HistoryLink Essay No. 21296).

Annexation & Regional Transportation Corridors

Many of the City's early connections to the region and nation and resulting land use decisions were dependent on water access. This dependency shifted in the late 1800s with expansion of the roadway and rail network. Seattle's first electric streetcars opened in 1889 and by 1892, the city had 48 miles of electric streetcars and 22 miles of cable railway. In 1902, the Seattle-

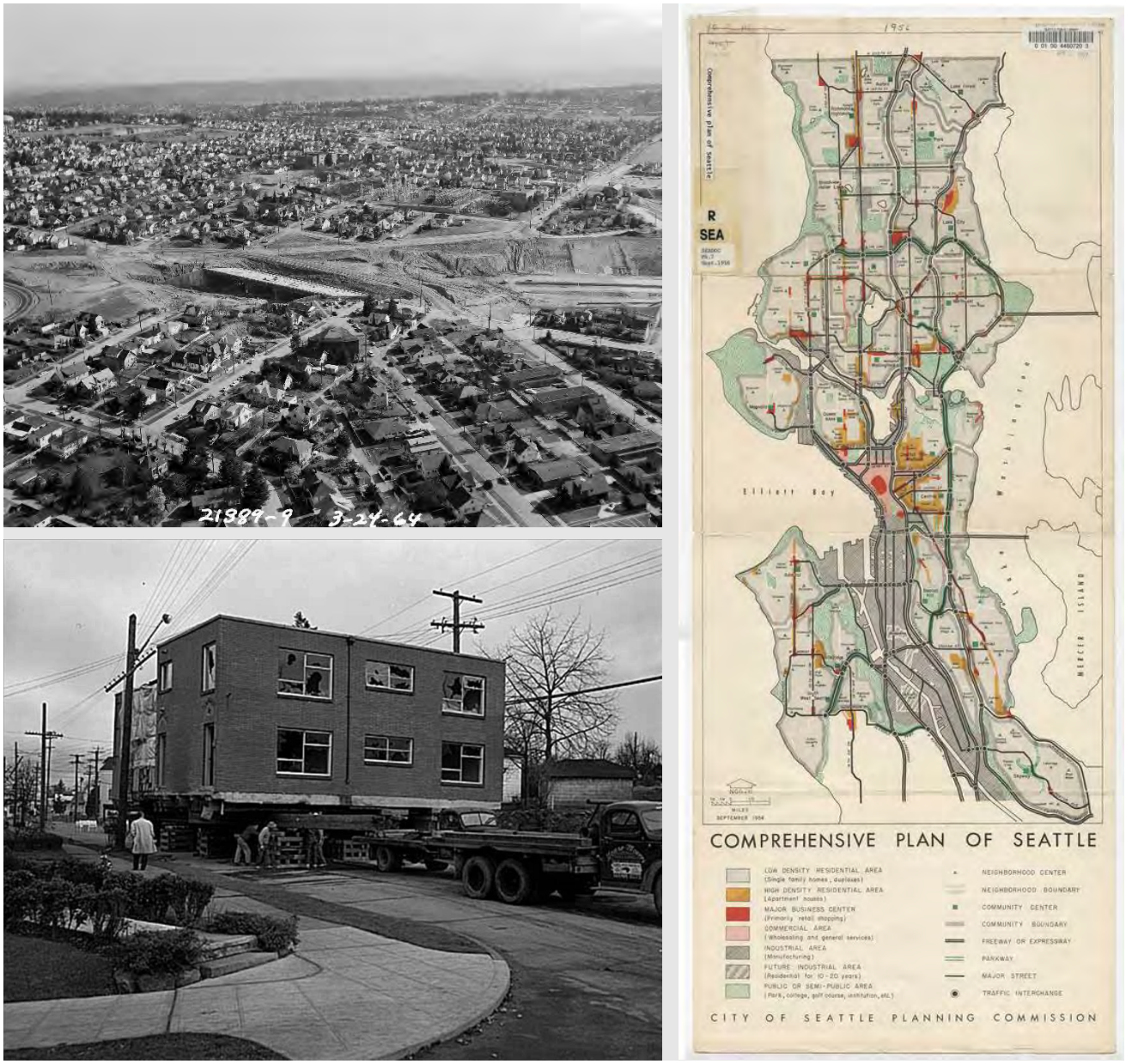
Tacoma Interurban Railway opened—which included stops in Rainier Beach, Renton, and Kent—and a Mount Vernon-to-Bellingham line opened by 1910. Street cars exposed new territory to speculative commercial and residential development and the city expanded through extensive annexation during the first part of the 20th century. As of 1891, the city extended from present-day Beacon Hill to the University District (then known as Brooklyn). Between 1905 and 1910, eight small towns (Ballard, Columbia, Georgetown, Laurelhurst, Rainier Beach, Ravenna, South Park, and West Seattle) were annexed to the City of Seattle, nearly doubling the physical area of the city. After Georgetown was annexed in 1910, no large annexations were made until the early 1950s. Much of the city north of N 85th Street was added during postwar annexation as major road networks accelerated the decentralization of the city.

Major transportation corridors constructed during the 20th century fundamentally changed Seattle's land use patterns and the neighborhoods bisected by them. These included the Pacific Highway built in the 1920s (later renamed US 99 and then SR 99 after construction of I-5), the George Washington Memorial Bridge (the Aurora Bridge) completed in 1932, the elevated Alaskan Way completed in 1936 and subsequent double-deck Alaskan Way Viaduct built in three phases from 1949 through 1959, and the Seattle Freeway (now I-5) constructed in the 1960s.

When the viaduct opened in 1953, it offered the first route around Seattle's congested central business district. The expressway relieved traffic on city streets, eased the movement of through traffic, and improved connections between growing southwest Seattle neighborhoods and downtown. Despite its utility, the viaduct was long viewed as a physical and visual barrier between downtown and the city's waterfront. Various groups and individuals argued and planned for its demise over several decades but the lack of a viable alternative for handling the tens of thousands of daily users stymied their efforts. The 2001 Nisqually earthquake significantly damaged the viaduct's joints and foundations and furthered the discussion. After a decade of studying, planning, and public discussion, the idea for a deep-bore tunnel garnered enough support to move forward. The southern end of the viaduct was demolished in October 2011 and tunnel boring took place from 2013-2017. The viaduct closed to traffic in January 2019, the new tunnel opened in February, and the remaining span of the viaduct was demolished later that year. New development along the waterfront in downtown Seattle—including a park promenade—are scheduled to be completed in 2025.

The Seattle Freeway, now known as I-5, also altered the landscape of Seattle's neighborhoods when it was constructed in the 1960s. Due to unique geographical and topographical constraints, the freeway's route was ultimately drawn directly through the center of the city, breaking east to avoid Green Lake and then bending west around Beacon Hill before continuing south (see **Exhibit 3.6-5**). Communities within or adjacent to the future construction path were sliced in half and severely impacted by the resulting displacement while communities on the western and eastern shores of the city remained intact. For example, eight square blocks of land demolished in the heart of the Chinese International District left the district divided and with an unpleasant edge condition for future redevelopment to contend with. In all, 20.5 miles of the route—or about 4,500 parcels of land (most of which were improved with homes, apartment buildings, or businesses)—were cleared for the construction.

Exhibit 3.6-5. I-5 Construction Through Seattle and the Planned Seattle Freeway System



Top left: Construction of I-5, 1964; Courtesy of the Seattle Municipal Archives. Bottom left: Apartment building being moved due to I-5 construction, 1960; HistoryLink Essay 4168 via MOHAI (1986.5.4007). Right: City of Seattle 1957 Comprehensive Plan; Seattle Public Libraries Special Collection.

Seattle's Freeway Revolt—one of a number of such uprisings across the U.S. in the 1960s and 70s—halted two other major freeways in the city and significantly downsized a third. Along with I-5, the City's Comprehensive Plan called for a parallel freeway on the Lake Washington side (the RH Thomson Expressway) that would have run from the Duwamish neighborhood in the south to Bothell in the north, and the Bay Freeway that would have connected Seattle Center to I-5 with a highway via a massive viaduct that cut through South Lake Union (see **Exhibit 3.6-5**). If built as planned, the RH Thompson Expressway would have cut through the

heart of the largely Black Central District Neighborhood, demolished as many as 3,000 homes, and displaced up to 8,000 people. The planned 14-lane interchange with I-90 alone (via an open trench on Mount Baker Ridge) would have displaced an estimated 4,000 residents and many businesses (as opposed to the existing tunnels that currently connect I-90 to I-5). A diverse consortium of activists faced the Seattle City Council and Highway Department head on to stop both of the planned freeways, which were eventually removed from the City's Comprehensive Plan in the 1970s and struck down by public referendum.

Century 21: the Seattle World's Fair and post-Exposition Civic Center

The Century 21 Exposition, also known as the Seattle World's Fair, was held between April 21 and October 21, 1962, and drew almost 10 million visitors. The 1962 Seattle World's Fair gave visitors a glimpse of the future and left Seattle with a lasting legacy, giving Seattle world-wide recognition and effectively "putting it on the map." Though the fair was primarily administered by the non-profit private Century 21 Exposition, Inc., substantial efforts were made to integrate the planning of the municipal, state, and private entities involved. In addition, the City of Seattle was deeply involved in development and execution. The City oversaw a number of fair-based building projects both within and beyond the fairgrounds, including the Monorail line, the International Fountain, and a 1,500-car garage along Mercer Street. Ultimately, the fair left the city a permanent legacy in the Seattle Center and its complex of performance, sports, and entertainment halls, as well as the Pacific Science Center, the Monorail, and the Space Needle.

The Modern Comprehensive Plan: Land Use Policies & Implementation

In 1957, Seattle adopted it first Comprehensive Plan "in principle" presented in the form of an illustrated map (see **Exhibit 3.6-5**). The Plan focused primarily on transportation, specifically the automobile, and protecting single-family homes. Per the adopting resolution, the Plan addressed "the most appropriate use of land, lessening traffic congestion and accidents, making provision for adequate light and air, avoiding undue concentration of population, promoting a coordinated development of vacant areas, encouraging the formation of neighborhood and community units, and the conservation and restoration of natural resources (Resolution 17488)." Various amendments were made to the 1957 Comprehensive Plan until 1978 when the City started relying instead on land use policies. The last major revision was made in 1965 and the City stopped issuing its own comprehensive plan in 1978, relying instead on land use policies, until the State adopted the 1990 Growth Management Act (GMA). Those land use policies drove a significant review of the City's land use regulations, resulting in the adoption of new zoning policies and regulations that supported mixed-use development through the 1980s.

The GMA was adopted in 1990 to address concerns about the impacts of uncoordinated growth on Washington communities and the environment and provides a framework for land use planning and development regulations in the state. As part of the GMA, most cities and counties in Washington (including Seattle) are required to adopt

See also **Section 3.8 Population, Housing, & Employment.**

comprehensive plans coordinated with regional and countywide planning. In 1994, the City adopted its first GMA mandated comprehensive plan developed around an "urban village strategy." This strategy focuses growth in walkable, mixed-use neighborhoods with good access to jobs, transit, and services. The City Council also adopted 37 neighborhood plans during the 1990s as part of this planning effort in response to concerns regarding the impact of the urban village strategy on neighborhoods.

The Comprehensive Plan and many neighborhood plans have been revised since the 1990s, but the City's overall urban village growth strategy has remained consistent. Growth has largely adhered to the plan with 83% of new homes built in urban centers or villages over the last 10 years (half of all housing was built in Downtown, South Lake Union, First Hill, and Capitol Hill). Substantial public and private investments have further supported the growth strategy in several villages, including Sound Transit's expansion of the light rail system and bio-tech sector growth in South Lake Union. Overall, the urban village strategy has guided residential, office, and retail development into a small number of compact, walkable, mixed-use neighborhoods linked by transit.

At the same time, the city's growth has led many neighborhoods to become increasingly exclusive and has contributed to a dearth of affordable housing for its working population, while endemic issues of racism, social injustice, and a warming planet continue to inspire demands for change. Many neighborhoods outside urban center and village boundaries have few housing options beyond detached homes. With the cost of these homes rising dramatically in the last 10 years, these neighborhoods are out of reach for most people who don't already own a home. The urban village strategy has also resulted in few new homeownership opportunities inside centers and villages since it focuses development in areas zoned primarily for apartments and retail.

Current Policy & Regulatory Frameworks

This section describes the future land use and zoning framework (including overlay districts), policies and regulations regarding urban form and aesthetics (height, bulk, and scale, transitions, tree canopy, shadows, and views), and current land use conditions. Current policy and regulatory framework regulating land use in the City of Seattle flows from the GMA, the PSRC's VISION 2050 and MPPs, King County's CPPs, the City's current Comprehensive Plan, and implementation actions including development standards in the Seattle Municipal Code (SMC) and the Shoreline Master Program (SMP). Several other regulatory measures affect land use including localized overlay districts and design guidelines. Most state, regional, and local land use policies are reviewed and evaluated in **Section 3.7 Relationship to Plans, Policies, & Regulations** with policies and regulations specific to urban form and aesthetics discussed below.

Future Land Use & Zoning

The City of Seattle's Future Land Use Map (FLUM) is part of the Comprehensive Plan and expresses spatially the 20-year vision of preferred land use patterns to guide development within the city. Four land use area types implement the urban village strategy—urban centers, hub urban villages, residential urban villages, and manufacturing/industrial centers (MICs). Four other land use types—neighborhood residential areas, multi-family residential areas, commercial/mixed-use areas, and industrial areas—are meant to suggest specific uses outside of the urban villages. The FLUM also designates major institutions, cemeteries, and city-owned open space.

The future land use designations are implemented by a corresponding range of zoning districts and development regulations established in Title 23 of the Seattle Municipal Code (SMC). There may be different levels of zoning within each land use area that provide more detail about what can be built. Zoning overlays also exist in certain locations, such as around major institution overlay districts and in master planned communities. Property located within an overlay district is subject both to its zone classification regulations and to additional requirements imposed for the overlay district. The overlay district provisions apply if they conflict with the provisions of the underlying zone. **Exhibit 3.6-6** summarizes future land use designations and corresponding implementing zones. See also **Appendix G.1** for a summary of general zoning categories and overlay districts detailed in SMC Title 23.

Exhibit 3.6-6. Existing Future Land Use Designations and Typical Implementing Zones

Future Land Use Designation	Typical Implementing Zones[1]
Urban Centers[2] Urban centers are the densest Seattle neighborhoods. They act as both regional centers and local neighborhoods that offer a diverse mix of uses, housing, and employment opportunities.	▪ Downtown (DH1, DH2, DMC, DMR, DOC1, DOC2, and DRC) ▪ Pike Market Mixed (PMM), Pioneer Square Mixed (PSM), and International District Mixed and Residential (IDM and IDR) ▪ Seattle Mixed (SM) ▪ Lowrise, Midrise, and Highrise Multifamily (LR3, MR, and HR) ▪ Neighborhood Commercial (NC2, and NC3) ▪ Commercial (C1 and C2)
Hub Urban Villages[2] Hub villages are communities that offer a balance of housing and employment but are generally less dense than urban centers. These areas provide a mix of goods, services, and employment for their residents and surrounding neighborhoods.	▪ Residential Small Lot (RSL) ▪ Lowrise Multifamily (LR1, LR2, and LR3) ▪ Midrise Multifamily (MR) ▪ Neighborhood Commercial (NC1, NC2, and NC3) ▪ Commercial (C1 and C2)
Residential Urban Villages[2] Residential villages are areas of residential development, generally at lower densities than urban centers or hub urban villages. While they are also sources of goods and services for residents and surrounding communities, for the most part they do not offer many employment opportunities.	▪ Residential Small Lot (RSL) ▪ Lowrise Multifamily (LR1, LR2, and LR3) ▪ Midrise Multifamily (MR) ▪ Neighborhood Commercial (NC1, NC2, and NC3)

Future Land Use Designation	Typical Implementing Zones[1]
Manufacturing Industrial Centers (MICs) Manufacturing industrial centers are home to the city's thriving industrial businesses. Like urban centers, they are important regional resources for retaining and attracting jobs and for maintaining a diversified economy. Most of the city's shipping, manufacturing, and freight-distribution activities take place in the city's two manufacturing/industrial centers.	▪ Industrial (MML, II, UI, IC)
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 areas with limited access to services, infrastructure constraints, fragile environmental conditions, or that are otherwise not conducive to more intensive development.	▪ Neighborhood Residential (NR1, NR2, and NR3)
Multi-Family Residential Areas The city's multi-family areas contain a variety of housing types. You might find duplexes or townhouses, walk-up apartments, or highrise towers. Overall, these areas offer more choices for people with different living styles and a wider range of incomes than single-family zones.	▪ Lowrise Multifamily (LR1, LR2, and LR3) ▪ Midrise Multifamily (MR)
Commercial / Mixed Use Areas Commercial/mixed-use areas are places meant to provide jobs and services. Most of these areas also allow housing.	▪ Neighborhood Commercial (NC1, NC2, and NC3) ▪ Commercial (C1 and C2)
Industrial Areas In limited industrial areas outside the two MICs, City zoning rules allow industrial activity such as manufacturing, warehousing, and shipping of goods through waterways, railways, and highways.	▪ Industrial (MML, II, UI, IC)
Major Institutions	▪ Major Institution Overlay District. Underlying zoning varies depending on the surrounding community.
Cemetery	▪ Neighborhood Residential (NR2 and NR3) ▪ Lowrise Multifamily (LR3)
City-Owned Open Space	▪ Neighborhood Residential (NR1, NR2, and NR3)

1 See **Appendix G.1** for more detailed summaries of general zoning categories and overlay districts, respectively.
2 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 the other a~~A~~lternatives ~~2-5~~.
Sources: City of Seattle Future Land Use Map, 2022; BERK, 2023.

Shoreline Master Program

The Washington State Shoreline Management Act (SMA) requires all counties and most towns and cities to plan for how shorelines in their jurisdiction will develop through a Shoreline Master Program (SMP). Seattle's SMP applies to the shorelines and all waters of the state, as document in the City's Official Land Use Map (SMC 23.32). The Shoreline District includes all land within 200 feet of the city's major water bodies—Puget Sound, Lake Washington, Lake Union, the Lake Washington Ship Canal, and the Duwamish River—as well as hydrologically connected wetlands and all submerged land. The adopted Seattle SMP is comprised of the goals and policies in the Shoreline Areas Element of the Comprehensive Plan, SMP regulations in the Land Use Code (SMC 23.60A), maps of the locations of shoreline environments, and the Shoreline Restoration and Enhancement Plan.

The SMP must address a wide range of physical conditions and development settings along areas of the shoreline. Seattle's SMP prescribes different environmental protection measures, allowable use provisions, development standards, and other policy and regulatory measures based on the environmental designation of each area in the Shoreline District. Shoreline environment designations within Seattle's Shoreline District are divided into two broad categories—Conservancy and Urban—and then subdivided further within these two categories. The conservancy shoreline environments are less developed and provide for areas of navigation, recreation, and habitat protection. The urban shoreline environments are areas that are more developed and provide for single-family houses and water-dependent and water-related uses. SMC 23.60A.220(D) details the purpose and locational criteria of each environment designation.

Urban Form

Height, Bulk, & Scale

Development regulations govern what uses are permitted, as well as the physical form (such as heights and setbacks) of development, which influences urban character. Policies guiding height, bulk, and scale in the Land Use Element of the Comprehensive Plan include:

> ***LU 5.3*** *Control the massing of structures to make them compatible with the area's planned scale, provide a reasonable ratio of open to occupied space on a site, and allow the building to receive adequate natural light.*
>
> ***LU 5.4*** *Use maximum height limits to maintain the desired scale relationship between new structures, existing development, and the street environment; address varied topographic conditions; and limit public view blockage. In certain Downtown zones and in industrial zones, heights for certain types of development uniquely suited to those zones may be unlimited.*
>
> ***LU 5.5*** *Provide for residents' recreational needs on development sites by establishing standards for private or shared amenity areas such as rooftop decks, balconies, ground-level open spaces, or enclosed spaces.*

> ***LU 5.6*** *Establish setbacks in residential areas as needed to allow for adequate light, air, and ground-level open space; help provide privacy; promote compatibility with the existing development pattern; and separate residential uses from more intensive uses.*

These policies are reiterated in SMC 25.05.675.G Specific Environmental Policies – Height, bulk, and scale, which set environmental review policies to provide for "smooth transition between industrial, commercial, and residential areas, to preserve the character of individual City neighborhoods, and to reinforce natural topography by controlling the height, bulk, and scale of development." Specifically, SMC 25.05.675.G.2 includes height, bulk, positioning, design, and other mitigation techniques and states the following intent:

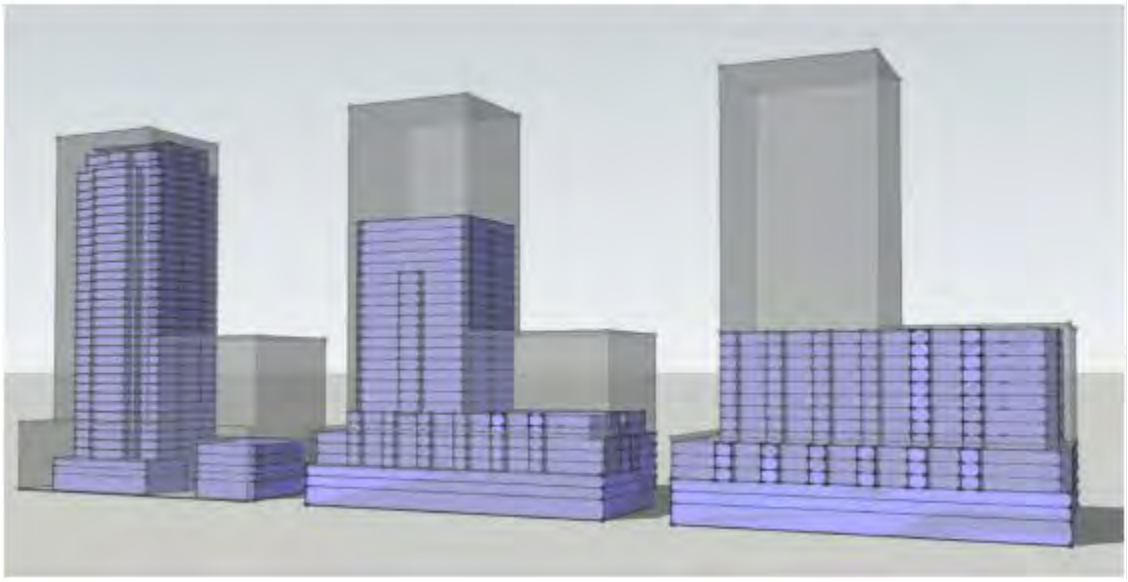
> *It is the City's policy that the height, bulk, and scale of development projects should be reasonably compatible with the general character of development anticipated by the goals and policies set forth in the Land Use Element, Growth Strategy Element, and Shoreline Element of the Seattle Comprehensive Plan; the procedures and locational criteria for shoreline environment redesignations set forth in Sections 23.60A.060 and 23.60A.220; and the adopted land use regulations for the area in which they are located, and to provide for a reasonable transition between areas of less intensive zoning and more intensive zoning.*

The height, bulk, scale, and character of development vary considerably across Seattle. Seattle's zoning regulations include limits on building height, as well as other characteristics, including density, floor area ratio (FAR), minimum setbacks, and maximum lot coverage. All of these qualities contribute to the overall intensity of development at any given location. Building height and FAR limits are two of the most important code elements that directly influence how intense a development feels in a given location. FAR is the ratio of a building's floor area to the size of the lot where it is located. For most zoning districts, the City of Seattle has established both a maximum allowed height and a maximum allowed FAR. The relationship between building height and FAR can be viewed as a shorthand for assessing the "bulkiness" of building. For example, a tall building with a low FAR will take up a smaller proportion of its building site than a relatively short building with a higher FAR (see **Exhibit 3.6-7** and **Exhibit 3.6-8**).

Exhibit 3.6-7. Zoning Envelopes and Floor Area Ratios

Gray: *hypothetical "zoning envelopes" established by setbacks, height limits, tower floorplate limits, minimum tower separation and other development standards.*

Blue: *possible building configurations within the allowed zoning envelope, limited by a floor area ratio (FAR) of 12. All three buildings have the same amount of floor area but they configure the space differently.*



Note: A floor plate is the horizontal plane of the floor of a building, measured to the inside surface of exterior walls. Floor area ratio is the ratio of the total square feet of a building to the total square feet of the property on which it is located. Building floor area / Lot size = Floor Area Ratio
Source: City of Seattle, 2013.

Exhibit 3.6-8. Understanding Floor Area Ratios and Lot Coverage



Source: City of Seattle, 2019.

In neighborhood residential zones, Seattle limits FAR to (SMC 23.44.011.B):

1. *The FAR limit on lots developed with a single-family dwelling unit as the principal use in NR1, NR2, and NR3 zones, is 0.5, except that lots with less than 5,000 square feet of lot area can include up to 2,500 square feet of total chargeable floor area. The applicable FAR limit applies to the total chargeable floor area of all structures on the lot.*
2. *The FAR limit in RSL zones is 0.75. The applicable FAR limit applies to the total chargeable floor area of all structures on the lot.*

Transitions

The Growth Strategy Element of the Comprehensive Plan includes the following policy on urban design transitions:

> ***GS 3.11*** *Use zoning tools and natural features to ease the transitions from the building intensities of urban villages and commercial arterials to lower-density developments of surrounding areas.*

Other elements of the Comprehensive Plan also mention the importance of smooth transitions around urban villages and industrial areas. Smooth transitions are also mentioned in SMC 25.05.675.G Specific Environmental Policies (see **Height, Bulk, & Scale** above).

While transitions are achieved primarily through decisions about where different zones are applied, there are also some existing development code regulations that are intended to limit the impacts of zone transitions, including regulations regarding setbacks and upper-story step backs and appurtenances and nuisances. These are described in more detail below.

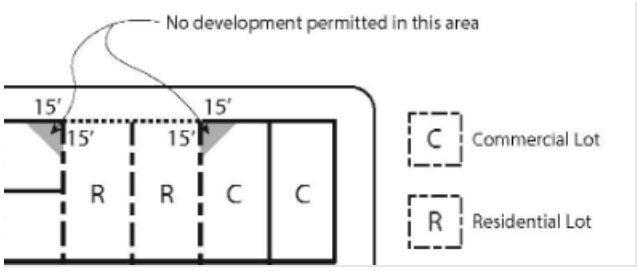
Setbacks & Upper-Story Setbacks (by Zone)

Multifamily zones. SMC 23.45.518 regulates setbacks in multifamily zones and requires a 12-foot setback required for all portions of development in the lowrise zones above 34 feet that abut a neighborhood residential zone. For religious organizations building affordable housing, SMC 23.45.550 establishes FAR and height bonuses and requires a 10-foot setback on sites adjacent to neighborhood residential zones.

Commercial zones. SMC 23.47A.014 regulates setbacks in commercial zones, with the following provisions:

- Required corner setbacks of 15 feet, but not side setbacks, in commercial zones where they abut residentially zoned parcels. See **Exhibit 3.6-9**.

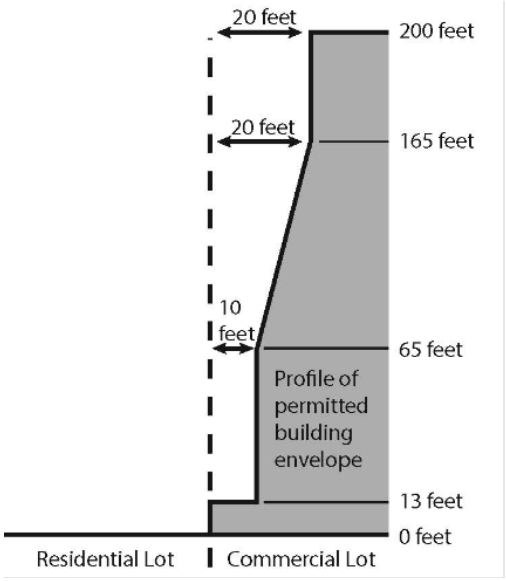
Exhibit 3.6-9. Corner Setbacks Required in Residential/Commercial Transitions



Source: Seattle Municipal Code Exhibit A for 23.47A.014.

- Required 10-foot setbacks for all portions of development above 13 feet, up to 65 feet, on parcels abutting residential or commercially zoned lots. Above 65 feet, an additional one-foot setback is required for each additional 10 feet of height to 165 feet, at which point no further setbacks are required. See **Exhibit 3.6-10**.

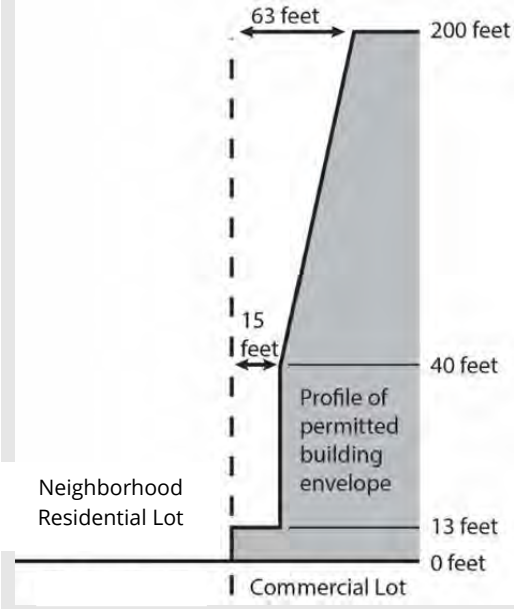
Exhibit 3.6-10. Upper Setbacks Required on Commercial Lots



Source: Seattle Municipal Code Exhibit B for 23.47A.014.

- Required 15-foot setbacks for all portions of development above 13 feet, up to 40 feet, on parcels abutting lots zoned neighborhood residential. Above 40 feet, an additional 3-foot setback is required for each additional 10 feet of height. See **Exhibit 3.6-11**.

Exhibit 3.6-11. Upper Setbacks Required: Commercial Adjacent to Neighborhood Residential



Note: Upper setbacks required on commercial lots adjacent to neighborhood residential lots
Source: Seattle Municipal Code Exhibit C for 23.47A.014.

Appurtenances & Nuisances

SMC 23.45.570 ensures that institutions located in Lowrise (LR) zones do not site noisy or visually harsh infrastructure like HVAC units, game courts, or kitchen ventilation within 20 feet from properties zoned neighborhood residential. In commercial zones, street-level use restrictions, setbacks, conditional use restrictions, and/or landscape screening requirements apply to specific uses or site elements like warehouses, drive-throughs, dumpsters, and drinking establishments near residential zones.

Tree Canopy

See **Section 3.3 Plants & Animals** for information about existing regulations and tree canopy patterns.

Tree protection. Seattle's tree code protects existing trees through rules established in Seattle Municipal Code 25.11.

Street trees. In most zones, Seattle also requires existing street trees to be retained unless the Director of SDOT approves their removal and for street trees to be planted with redevelopment, with some exceptions (SMC 23.45.524.B). Green Factor requirements are also required to be met for most new development in multi-family and commercial zones.

In the 130th/145th Station Area, street designations, which set standards for street tree planting areas, for key streets include:

- NE 130th St (east of Roosevelt Way NE): Neighborhood Yield Street—5-8-foot green stormwater infrastructure landscape strip

- Roosevelt Way NE, 15th Ave NE, NE 125th St, and NE 145th St: Urban Center Connector, Principal Arterial—6-12-foot landscape/furniture zone

Maximum lot coverage regulations are relevant to tree canopy because they have limited building mass in Seattle's lowest density zones for decades, leaving more space for vegetation. **Exhibit 3.6-12** lists maximum lot coverage limitations in Seattle's neighborhood residential zones.

Exhibit 3.6-12. Neighborhood Residential Maximum Lot Coverage

Zone	Lot Size	Maximum Lot Coverage
NR1, NR2, and NR3	Less than 5,000 square feet	1,000 square feet plus 15 percent of lot area
	5,000 square feet or more	35 percent of lot area
RSL	All lots	50 percent of lot area

Source: SMC 23.44.010.

Shadows

Seattle's environmental policies address shadows on public open spaces. Specific environmental policies – Shadows on Open Spaces (SMC 25.05.675.Q.2) states:

> *It is the City's policy to minimize or prevent light blockage and the creation of shadows on open spaces most used by the public.*
>
> *a. Areas outside of downtown to be protected are as follows:*
> *1) Publicly owned parks;*
> *2) Public schoolyards;*
> *3) Private schools which allow public use of schoolyards during non-school hours; and*
> *4) Publicly owned street ends in shoreline areas.*
>
> *b. Areas in downtown where shadow impacts may be mitigated are:*
> *1) Freeway Park;*
> *2) Westlake Park and Plaza;*
> *3) Market (Steinbrueck) Park;*
> *4) Convention Center Park; and*
> *5) Kobe Terrace Park and the publicly owned portions of the International District Community Garden.*

However, the policies also include, "due to the scale of development permitted in downtown, it is not practical to prevent such blockage at all public open spaces downtown" and "it is impractical to protect private properties from shadows through project-specific review" (SMC 25.05.675.Q.1).

Views

The Comprehensive Plan and Land Use Code establish policies and regulations for the protection of public views of important landmarks and natural features, as well as views from

specific designated viewpoints within the city and scenic qualities along mapped scenic routes. The Land Use Element of the Comprehensive Plan establishes the importance of public view preservation:

> ***LU 5.15*** *Address view protection through*
> - *zoning that considers views, with special emphasis on shoreline views;*
> - *development standards that help to reduce impacts on views, including height, bulk, scale, and view corridor provisions, as well as design review guidelines; and*
> - *environmental policies that protect specified public views, including views of mountains, major bodies of water, designated landmarks, and the Downtown skyline.*

The Land Use Element contains policies to regulate alteration and use of the shorelines in the City to provide substantial public access through visual or physical means and to promote interest and preservation of the physical and aesthetic qualities of the shorelines of the city. The Land Use Element also encourages the protection of views through policies related to building height limits and minimization of building bulk.

The Comprehensive Plan lists the following as important landmarks for public views:

- Downtown skyline
- Major bodies of water
- Shoreline areas
- Elliott Bay
- West Seattle
- Mount Rainier
- Olympic Mountains
- Space Needle
- Puget Sound
- Lake Washington
- Lake Union
- Portage Bay

SMC 25.05.675.P establishes environmental review policies for public view protection, specifically:

> *It is the City's policy to protect public views of significant* ***natural and human-made features****: Mount Rainier, the Olympic and Cascade Mountains, the downtown skyline, and major bodies of water including Puget Sound, Lake Washington, Lake Union and the Ship Canal, from public places consisting of… [a lengthy list of] specified viewpoints, parks, scenic routes, and view corridors….*
>
> *It is the City's policy to protect public views of* ***historic landmarks*** *designated by the Landmarks Preservation Board that, because of their prominence of location or contrasts of siting, age, or scale, are easily identifiable visual features of their neighborhood or the City and contribute to the distinctive quality or identity of their neighborhood or the City.*

Additional policies protect views of the Space Needle (25.05.675.P.2.c) from:

- Alki Beach Park (Duwamish Head)
- Bhy Kracke Park
- Gasworks Park
- Hamilton View Point
- Kerry Park
- Myrtle Edwards Park
- Olympic Sculpture Park
- Seacrest Park
- Seattle Center
- Volunteer Park

In Downtown, there are also view corridors to be protected through upper-level building setbacks in future development along the following streets (SMC 23.49.024):

- Broad, Clay, Vine, Wall, Battery, and Bell Streets west of First Avenue; and
- University, Seneca, Spring, Madison, and Marion Streets west of Third Avenue.

While the Comprehensive Plan and the Seattle Municipal Code establish the importance of view corridors and view preservation, in many cases the precise requirements for individual development projects are not strictly defined in the development regulations and protection of public views is deferred to consideration during project reviews and the design review process.

Major Land Use Policy Changes Recently Adopted or Currently Under Consideration

Seattle Transportation Plan Update & EIS

The City of Seattle ~~is currently~~ updated~~ing~~ its long-term vision for the future of transportation in Seattle. The Seattle Transportation Plan (STP) and associated EIS address mobility, access, and public space needs in a single document as a unified system. This effort ~~will~~ incorporated several city initiatives like Seattle's Vision Zero, the Race and Social Justice Initiative, the Climate Action Plan, the Transportation Electrification Blueprint, and others. Additionally, it ~~will~~ references plans created by other regional transportation agencies.

Seattle Parks & Open Space Plan Update

The City of Seattle's Parks and Open Space Plan (POS) was recently updated in 2024~~adopted in 2017 and is updated every 6 years, with the next major update planned for 2024~~. It provides an inventory of existing parks and open space, objectives for future actions, demand and need analysis including demographic and recreation trends, and recommended capital projects.

Design Review

The City is currently updating its Design Review Program to be consistent with HB 1293. HB 1293 requires that all design standards must be clear and objective and that there be a maximum of one public meeting. In addition to limiting projects to only one public meeting, proposed amendments would streamline the process to be quicker and less costly for applicants. Per HB 1293, the required revisions must be adopted by City Council within six months after the Comprehensive Plan is updated.

Current Conditions

Citywide

Future Land Use & Zoning

Land area in the City of Seattle encompasses approximately 83.83 square miles (53,651 acres).[22] The largest future land use designation category in the city is neighborhood residential, accounting for 52% of the city. Another one-quarter of the city is designated as a center or village (28%) with 6% in urban centers, 3% in hub urban villages, 8% in residential urban villages, and 11% in MICs. Of the remaining quarter of the city, 10% is designated as city-owned open space, 5% is designated as multi-family residential, 3% is designated as commercial/mixed-use, 1% is designated as major institution, and land designated as cemeteries or industrial areas outside the MICs account for less than 1% each. See **Exhibit 3.6-14** and **Appendix G.1**.

There are currently six urban centers, six hub urban villages, 18 residential urban villages, and two manufacturing industrial centers (MICs) in the city. The six urban centers (Downtown, Uptown, South Lake Union, First Hill/Capitol Hill, University Community, and Northgate) and two MICs (Greater Duwamish MIC and Ballard–Interbay–Northend MIC (BINMIC)) are also designated PSRC Metro Regional Growth Centers (RGCs) and Employment MICs, respectively. These regionally designated centers are part of the regional growth strategy in VISION 2050 to focus growth in urban areas with access to transit. The six RGCs meet PSRC's existing activity unit threshold for Metro RGCs (see the text box on the following page for additional information about PSRC versus King County RGC requirements).

[22] OFM Estimates of April 1 Population Density and Land Area by City and Town, 2022.

Section 3 of PSRC's 2018 Regional Centers Framework Update includes designation criteria for Metro RGCs. Among other criteria, this includes a minimum density of 30 existing activity units and 85 planned activity units. Metro RGCs are also expected to be between 320–640 acres in size (or larger if served by an internal, high-capacity transit system). Urban RGCs must meet a minimum density of 18 existing activity units and 45 planned activity units and the same size thresholds.

Appendix 6 of the King County Countywide Planning Policies (CPPs) includes designation criteria for countywide growth centers although none are currently designated in King County. The criteria include an existing density of at least 18 activity units and planned density of at least 30 activity units. Countywide growth centers are also expected to be between 160–500 acres in size. Appendix 6 also includes designation criteria for Metro and Urban Growth Centers that are higher than PSRC's current requirements (60 existing/120 planned for Metro and 30 existing/60 planned for Urban). Per the CPPs, not meeting existing activity unit thresholds for existing centers (all of Seattle's existing Urban Centers) is not grounds for de-designation or re-designation by the Growth Management Planning Council.

See also **Section 3.7 Relationship to Plans, Policies, & Regulations** for more discussion of PSRC Metro Regional Growth Centers and King County Countywide Centers.

Countywide Planning Policies were amended in 2021 to allow for designation of countywide centers based partially on size and activity levels. The City has not formally proposed countywide centers but may do so with the Comprehensive Plan Update. Thus, the size and activity units for both regional and countywide level centers are described below. Existing acreage and activity units per acre in each center and village are listed in **Exhibit 3.6-13.** Locations where the acreage or densities fall outside King County's countywide center designation criteria of 160–500 acres or below the minimum existing 18 activity units per acre are highlighted. All existing urban villages except the South Park Residential Urban Village in Area 7 meet the King County threshold of 18 existing activity units per acre. Several urban villages are below the minimum size threshold of 160 acres (the Lake City Hub Urban Village and the Admiral, Green Lake, Greenwood–Phinney Ridge, Madison–Miller, Morgan Junction, and Upper Queen Anne residential urban villages) and one is above the maximum size threshold of 500 acres (the 23rd & Union Jackson Residential Urban Villages). Note that PSRC's MIC designation criteria do not include an activity unit density threshold and so existing activity units per acre are not calculated for the two MICs.

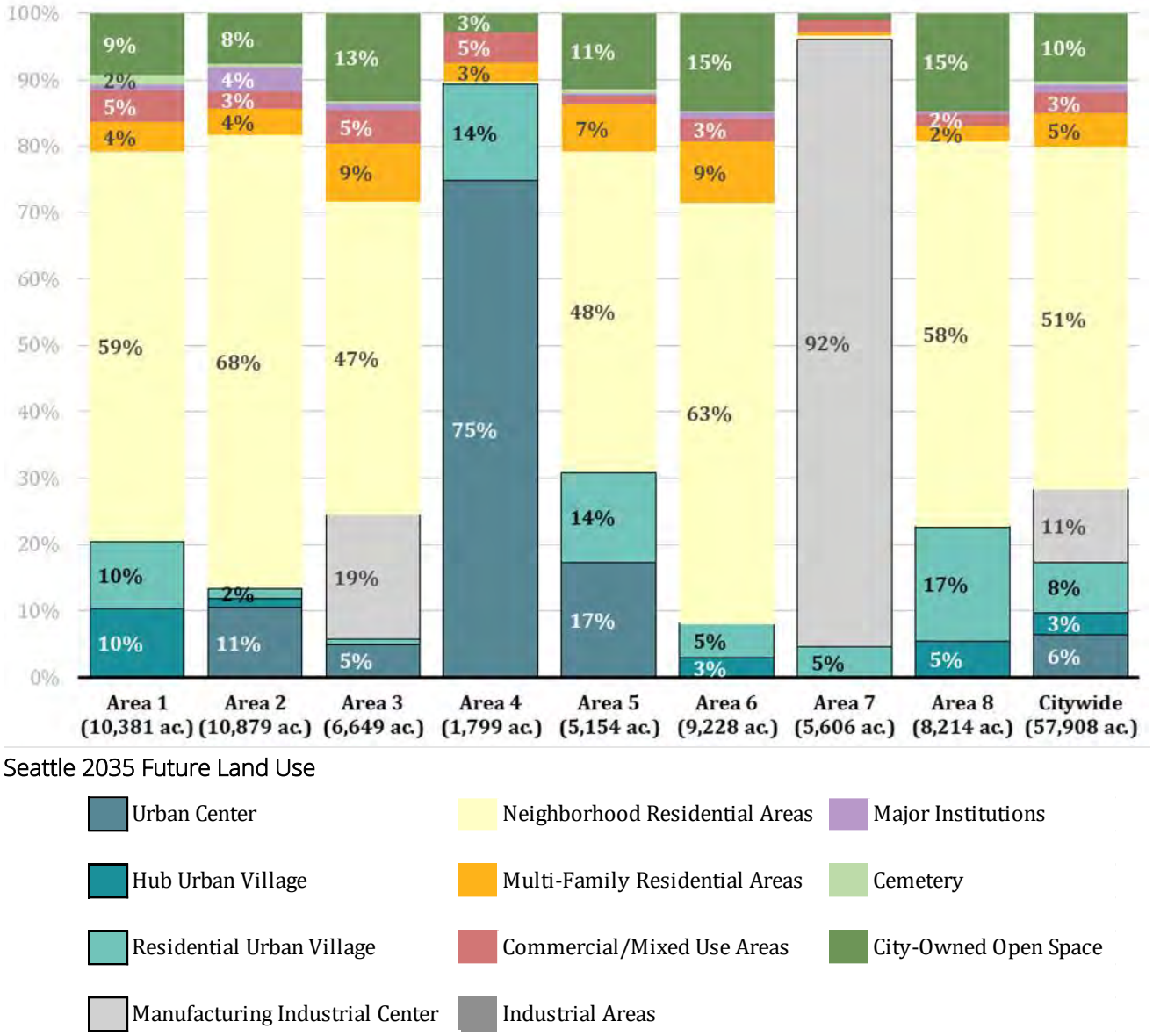
Adopted aggregate Future Land Use designations in Seattle are mapped in **Exhibit 3.6-15**. Outside of centers and villages, commercial, mixed-use, and multi-family designations generally follow main arterials such as Holman Rd NW/15th Ave NW/15th Ave W, SR 99, Greenwood/Phinney Ave N, 15th Ave NE, Lake City Way NE, Sand Point Way NE, Westlake Ave N, E Madison St, Alki Ave SW, California Ave SW, Delridge Way SW, MLK Jr Way S, and Rainier Ave S. Neighborhood residential areas fill the intervening areas, along with city-owned open space and major institutions. This is consistent with existing land use patterns (discussed below). Industrial designations outside the MICs are typically adjacent to the MICs or other major roadways (e.g., the north shore of Lake Union, near Smith Cove, and near the I-5/I-90 interchange).

Exhibit 3.6-13. Centers and Villages—Existing Location, Size, and Activity Units

Center/Village	Analysis Area	Existing Acres	Existing AU	Existing AU/Ac.
Urban Centers[1]				
Downtown	4	952	359,361	377.4
First Hill/Capitol Hill	5	916	127,812	139.5
University Community	2	753	41,085	54.5
South Lake Union	4	340	80,456	236.7
Uptown	3	333	43,759	131.3
Northgate	2	412	23,611	57.3
Hub Urban Villages[1]				
Ballard	1	495	33,565	67.7
Bitter Lake Village	1	364	16,015	44.0
Fremont	1	214	15,431	71.9
Lake City	2	142	8,197	57.6
Mt Baker	8	491	17,689	36.0
West Seattle Junction	6	269	18,972	70.4
Residential Urban Villages[1]				
23rd & Union–Jackson	5	625	24,348	38.9
Admiral	6	98	4,842	49.2
Aurora–Licton Springs	1	327	14,428	44.1
Columbia City	8	335	11,352	33.9
Crown Hill	1	271	6,863	25.3
Eastlake	4	199	13,986	70.2
Green Lake	1	109	7,675	70.6
Greenwood–Phinney Ridge	1	94	7,956	84.5
Madison–Miller	5	145	9,488	65.3
Morgan Junction	6	113	3,865	34.1
North Beacon Hill	8	267	7,506	28.1
Othello	8	499	11,824	23.7
Rainier Beach	8	346	7,967	23.0
Roosevelt	2	170	10,448	61.4
South Park	7	263	3,879	14.7
Upper Queen Anne	3	53	4,709	89.5
Wallingford	1	258	10,868	42.2
Westwood–Highland Park	6	275	7,668	27.9
MICs				
Ballard–Interbay–Northend	3	932	17,660	NA
Greater Duwamish	7	4,953	62,335	NA

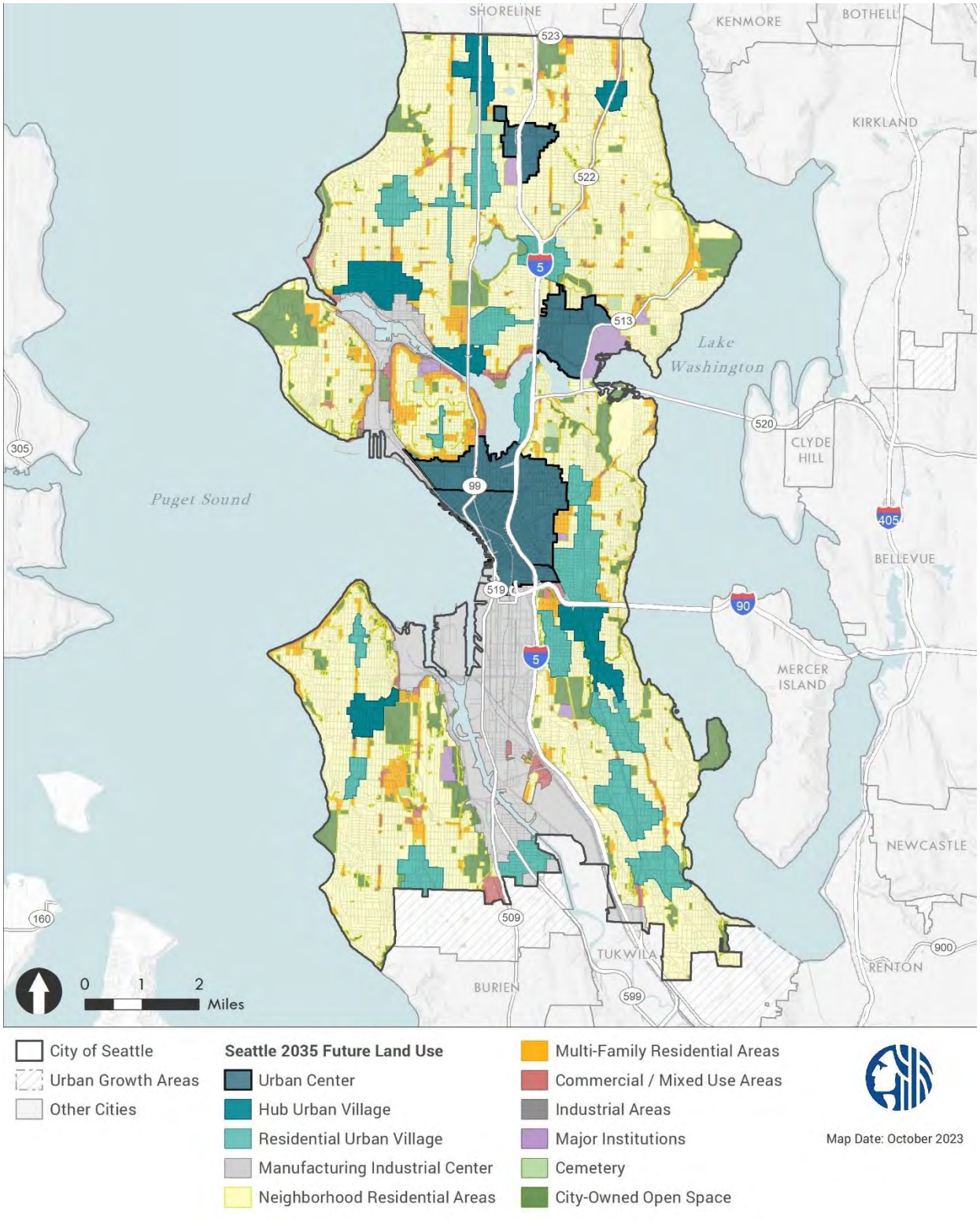
1 See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Note: Activity units (AU) is the sum of residential population and jobs. Assumes an average household size of 2.05 per the King County Growth Management Planning Council. Highlighted densities or size fall outside King County's countywide center designation criteria of 160-500 acres or below the minimum 18 existing AU per acre (note PSRC's MIC designation criteria does not include an activity unit density threshold).
Sources: City of Seattle, 2023; BERK, 2023.

Exhibit 3.6-14. Future Land Use Designations—Percent Citywide and by EIS Analysis Area (Acres)



Note: 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 the other a~~A~~lternatives ~~2–5~~.
Sources: City of Seattle, 2022; BERK, 2023.

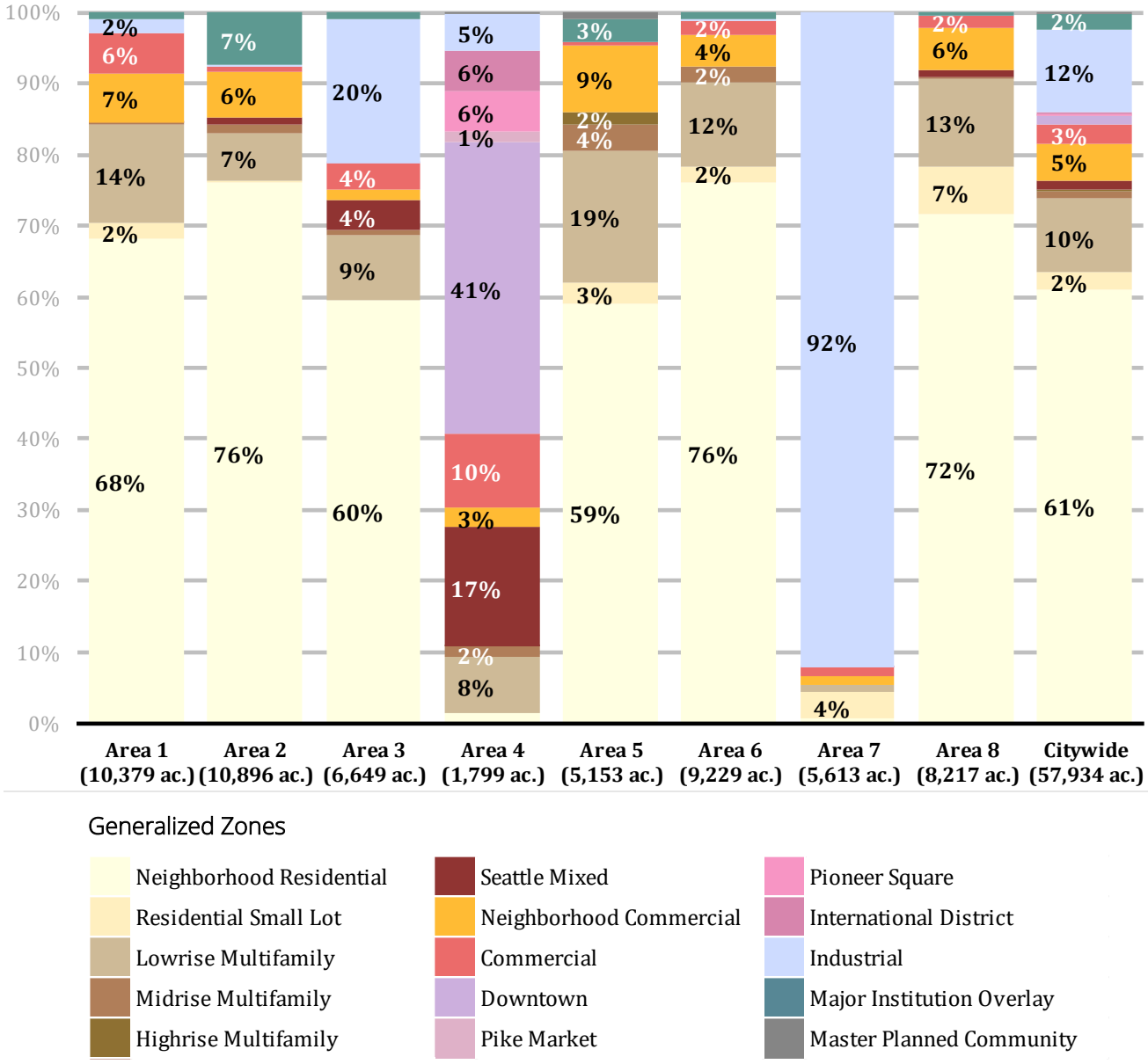
Exhibit 3.6-15. Citywide Future Land Use Designations



Note: 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 the other a~~A~~lternatives ~~2–5~~.
Sources: City of Seattle, 2022; BERK, 2023.

About three-quarters of the city is zoned for residential development, of which 61% is zoned Neighborhood Residential, 2% Residential Small Lot, and 12% zoned Multi-family. About 12% of the city is zoned industrial, 5% neighborhood commercial, and 3% commercial. The remaining zones account for about 5% of land in the city. See **Exhibit 3.6-16** and **Appendix G.1**.

Exhibit 3.6-16. Generalized Zoning—Percent Citywide and by EIS Analysis Area (Acres)

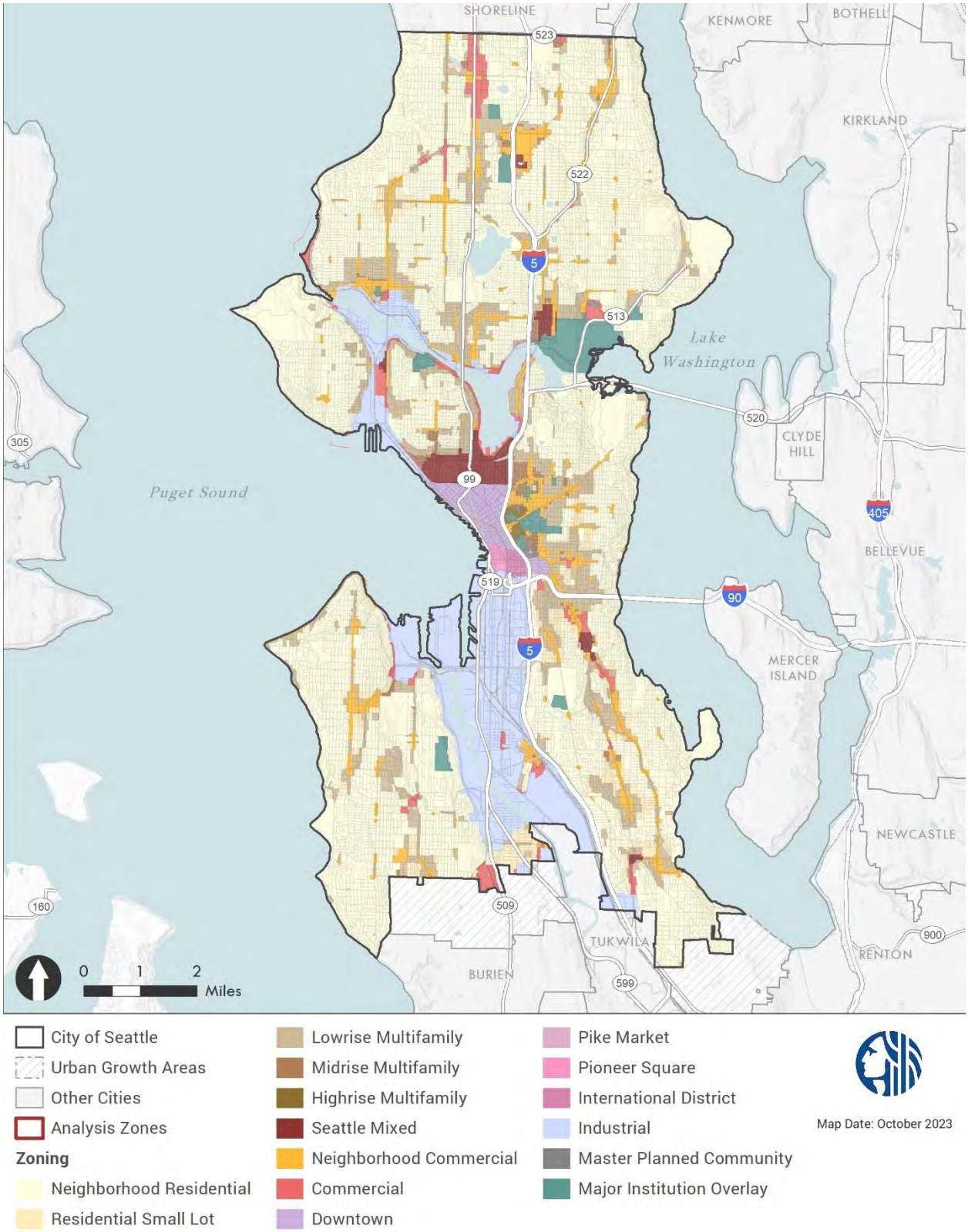


Sources: City of Seattle, 2022; BERK, 2023.

Generalized zoning in Seattle is mapped in **Exhibit 3.6-17**. Most areas designated and zoned for commercial/mixed-use or multifamily residential uses are located in centers or villages. The general commercial zones tend to be found on major arterials and are more auto-oriented. Neighborhood Commercial and Seattle Mixed zones use development standards intended to produce more walkable environments and are better for housing development. Commercial and multifamily zoning outside centers or villages tends to be concentrated around major arterials. Industrial zoning is concentrated in the two MICs. City zoning rules in these areas allow industrial activity such as manufacturing, warehousing, and shipping of goods through waterways, railways, and highways.

Most areas outside center, village, and MIC boundaries are zoned for neighborhood residential use. Neighborhood Residential zones cover much of the city. While these areas are commonly considered residential neighborhoods, they also include various uses beyond housing. For instance, most of the public park land is found in these zones, as are many schools, cemeteries, and fire stations. In most of these areas, houses are usually three stories or less in height and typically have yards and open space around them. Much of the land in these areas has been built to the densities allowed under current zoning rules.

Exhibit 3.6-17. Citywide Generalized Zoning



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

Shorelines

Shorelines designations overlay the primary future land use designations and zoning regulations. The Shoreline District encompasses 7,447 acres in the study area citywide and is regulated through zoning and shoreline environment designations. A little less than two-thirds of the shoreline citywide is within a conservancy shoreline environment (61%) and a little more than one-third is within an urban shoreline environment (39%). About 25% of the shoreline is designated Conservancy Recreation (CR), 22% is designated Conservancy Preservation (CP), and 10% is designated Conservancy Management (CM). Conservancy environments are typically located in waterways and on shorelines bordering neighborhood residential areas and city-owned open space. The other conservancy shoreline environments are concentrated in waterways such as Green Lake, Lake Union, the Lake Washington Ship Canal, and Smith Cove. About 19% of the shoreline is designated Urban Industrial (UI), primarily within the Greater Duwamish MIC and BINMIC. Urban Residential accounts for another 10% of the shoreline and is mostly located on the inland 200 feet of neighborhood residential areas. The other urban shoreline environments are concentrated around the Downtown waterfront and on the borders of Lake Union and the Lake Washington Ship Canal. **Exhibit 3.6-18** summarizes the acreage of each designation citywide and within each EIS Analysis Area. See also the **Shoreline Master Program** section for more detail about the SMP and the purpose of each environment designation.

Exhibit 3.6-18. Shoreline Environment Designations—Acres Citywide and by EIS Analysis Area

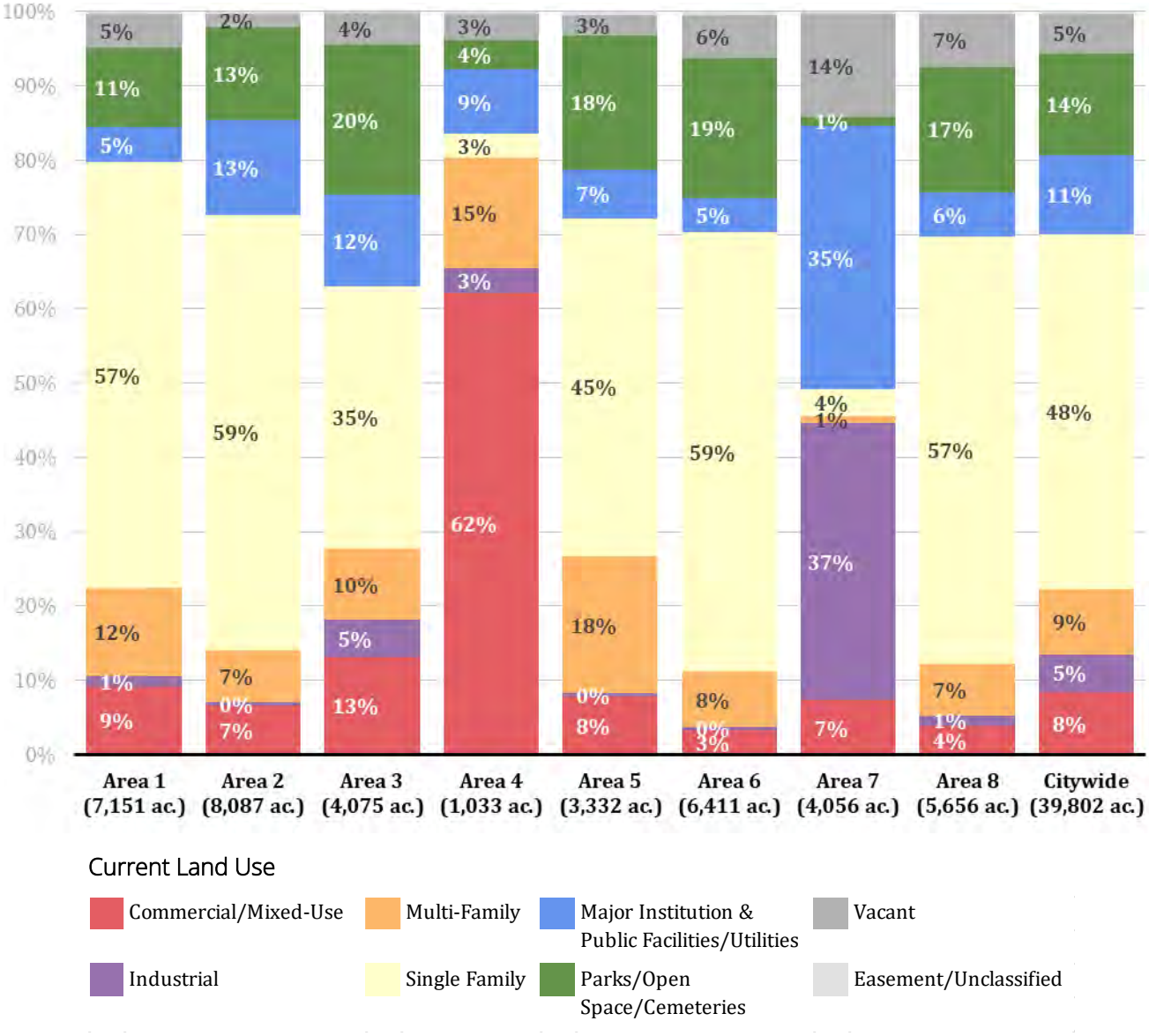
	EIS Analysis Area								
Shoreline Designation	1	2	3	4	5	6	7	8	Citywide
Conservancy Management	339 ac. (32.4%)	80 ac. (10.5%)	168 ac. (9.5%)	5 ac. (1.2%)	61 ac. (11.9%)	44 ac. (4.0%)	1 ac. (0.1%)	57 ac. (8.4%)	754 ac. (10.1%)
Conservancy Navigation	82 ac. (7.9%)	3 ac. (0.4%)	140 ac. (7.9%)	3 ac. (0.9%)	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%)
Total Acres & Percent of Citywide Total	**1,045 ac. (14%)**	**761 ac. (10%)**	**1,772 ac. (24%)**	**390 ac. (5%)**	**513 ac. (7%)**	**1,102 ac. (15%)**	**1,185 ac. (16%)**	**678 ac. (9%)**	**7,447 ac. (100%)**

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

Existing Land Use Pattern

Exhibit 3.6-19 summarizes percent of existing land use acreage citywide and by analysis area, excluding water bodies and public right-of-way. Citywide, the largest existing land use category is single family residential, which comprises about 48% of existing land uses. Parks and open space/cemeteries account for about 14% and major institutions and public facilities and utilities account for about 11% of existing land uses. Multi-family and commercial/mixed-use comprise 9% and 8%, respectively, while industrial and vacant land uses each comprise 5% of total existing uses in Seattle.

Exhibit 3.6-19. Current Land Use—Percent Citywide and by EIS Analysis Area (Acres)



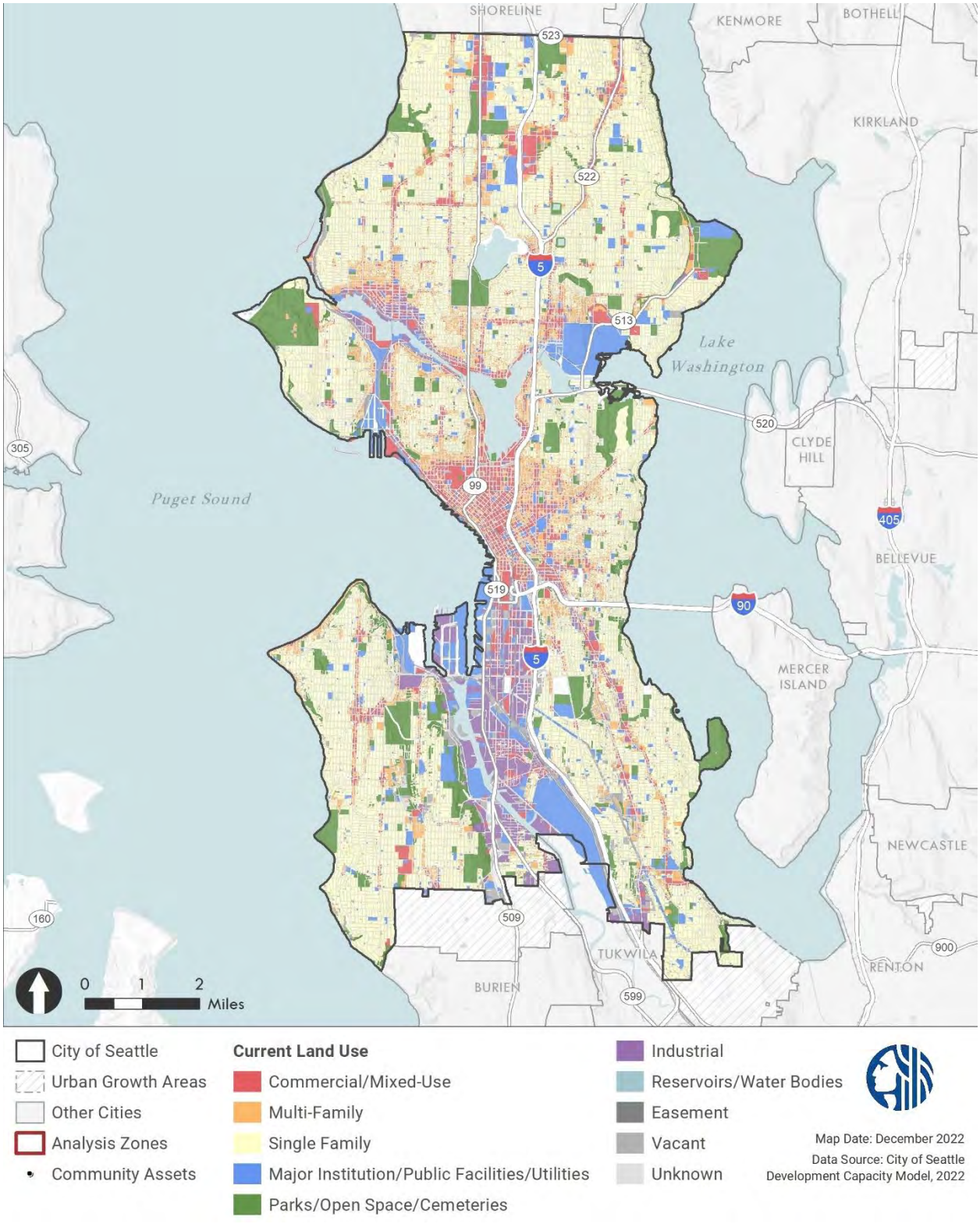
Sources: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-20 maps existing land use distribution across the city. The highest concentrations of commercial, mixed-use, and multi-family development are in the four urban centers that constitute the area sometimes called the "center city" (Downtown, First Hill/Capitol Hill, South Lake Union, and Uptown). Housing in these areas might be built as a stand-alone structure or along with commercial space. Mixed-use areas or projects contain residential and commercial uses and often have offices or stores on the ground floor with housing above. Other centers, villages, and smaller nodes around the city also contain varying levels of commercial, mixed-use, and multi-family development.

Outside of the centers and villages, concentrations of commercial, mixed-use, and multifamily development generally follow main arterials such as Holman Rd NW/15t Ave NW/15th Ave W, SR 99, Greenwood/Phinney Ave N, 15th Ave NE, Lake City Way NE, Sand Point Way NE, Westlake Ave N, E Madison St, Alki Ave SW, California Ave SW, Delridge Way SW, MLK Jr Way S, and Rainier Ave S.

Single-family residential neighborhoods fill the intervening areas, along with parks, open space, and major institutional uses. Industrial development is concentrated in the Greater Duwamish MIC in south central Seattle and in the BINMIC northwest of Downtown (along the Duwamish River's historic meandering flood plain, Elliott Bay, Lake Union, and Salmon Bay). Only 5% of land is vacant, most of which is located near industrial areas or rail lines, along shorelines with critical areas, or adjacent to major utility easements or trails (such as the Chief Sealth Trail in Area 8). Some additional vacant lands are scattered throughout the single family areas.

Exhibit 3.6-20. Citywide Current Land Use



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

Height, Bulk, & Scale

The FLUM (**Exhibit 3.6-15**) illustrates the general building massing pattern across the city. Greater allowed height, bulk, and mass are generally concentrated in centers and villages. The manufacturing/industrial areas allow a range of heights, but most new development doesn't maximize the height allowance. Most of the city is zoned neighborhood residential with most of the buildings being 1- and 2-story detached homes.

Transitions

Existing development patterns for transitions between scales—both from one zone to another and within a single zone—vary across the city. Many areas with long established zone boundaries exhibit stark transitions between multi-family or commercial buildings and low-density residential areas. This is especially true in relatively recently developed areas of the city and areas that have seen intense development in recent decades, like Ballard. See **Exhibit 3.6-21**.

Exhibit 3.6-21. Urban Village Boundary (Black Dashed Line) In Ballard



Source: Image: Landsat/ Copernicus. Data: SI, NOAA, US Navy, NGA, GEBCO Data LDEO-Columbia, NSF, NOAA.

Some older areas exhibit gradual transitions from more to less intensive development types based on pre-zoning development patterns, with more intensive uses more likely to be developed near transit routes and amenities like parks and views. More and less intense buildings within a single zone intermingle more in older neighborhoods, where a variety of apartment/condo developments are regularly found adjacent to single family houses. See **Exhibit 3.6-22** and **Exhibit 3.6-23**.

Exhibit 3.6-22. Intermingling Development Types



Source: MAKERS, 2022.

Exhibit 3.6-23. Gradual Transition of Residential Uses In Capitol Hill



Note: Shows gradual transition from multi-family (blue) to single family (pink) uses in Capitol Hill.
Source: King County Assessor, 2021; MAKERS, 2023.

In recent years, development in centers and villages where parking is not required (primarily close to transit service) has created less disruptive transitions to the low-density residential scale, compared to areas where abundant car parking is required. Parking infrastructure like garages and surface parking presents a visual contrast with typical building design in low-density residential areas, where parking is visible, but not visually prominent. See **Exhibit 3.6-24**.

Exhibit 3.6-24. Driveways and Garages Visual Impacts



Note: Left: Infill development with new driveways and garages. Right: Nearby low-density neighborhood. Parking is visible, but less prominent.
Source: Google Maps Streetview. © Google 2023.

Tree Canopy

Seattle's residential lots currently provide much of Seattle's tree canopy. However, as Seattle becomes denser to meet the needs of a growing population, new buildings cover more ground, especially when surface parking is provided, causing removal of existing trees and/or reducing space available for new trees. Private property currently provides about 72% of tree canopy, while 28% is provided on public property including street rights-of-way, parks, and other City-owned land.[23] Since 2016, the City of Seattle saw an overall net loss of urban tree canopy (255 acres, 1.7%) while the goal is to increase tree canopy. The biggest losses were in parks (111 acres, 5.1%) and Neighborhood Residential areas (87 acres, 1.2%). Seattle's *Canopy Cover Assessment* states, "Loss is not equitable—Neighborhoods impacted by racial and economic injustice started with less canopy and lost more than the citywide average."[24]

Shadows

Seattle's hilly topography plays a major role in the prevalence of shadows. Generally, the north side of a hill or areas within a valley experience shadows during longer periods of the day. Trees, especially large, dense evergreens, cast significant shadows year-round. Building heights

[23] City of Seattle, Seattle Tree Canopy Assessment, 2016.
[24] City of Seattle, Urban Forestry Results Summary *Seattle's Canopy Cover Assessment*, 2023.

also play a major role, with buildings over 2 stories typically casting shadows onto the sidewalk for most of the winter. Unique shadow conditions are noted in the Analysis Area descriptions.

Views

Viewpoints and scenic routes are found throughout the city. As to be expected, they concentrate along waterfronts and/or topographically high points. The Duwamish lacks SEPA-protected viewpoints (though it does have protected "shoreline viewpoints"), likely due to the area being at a low point and public access being discouraged in the industrial area. North Seattle also has fewer protected viewpoints, despite existing high point views such as from Phinney Ridge overlooking Ballard and the Puget Sound. Factors that may influence a lack of viewpoints in north Seattle may include a combination of topography with fewer natural viewpoints, large trees blocking views, and limited public space at high points. A similar situation may exist in Rainier Valley, where land is topographically lower.

Analysis Areas

Area 1: NW Seattle

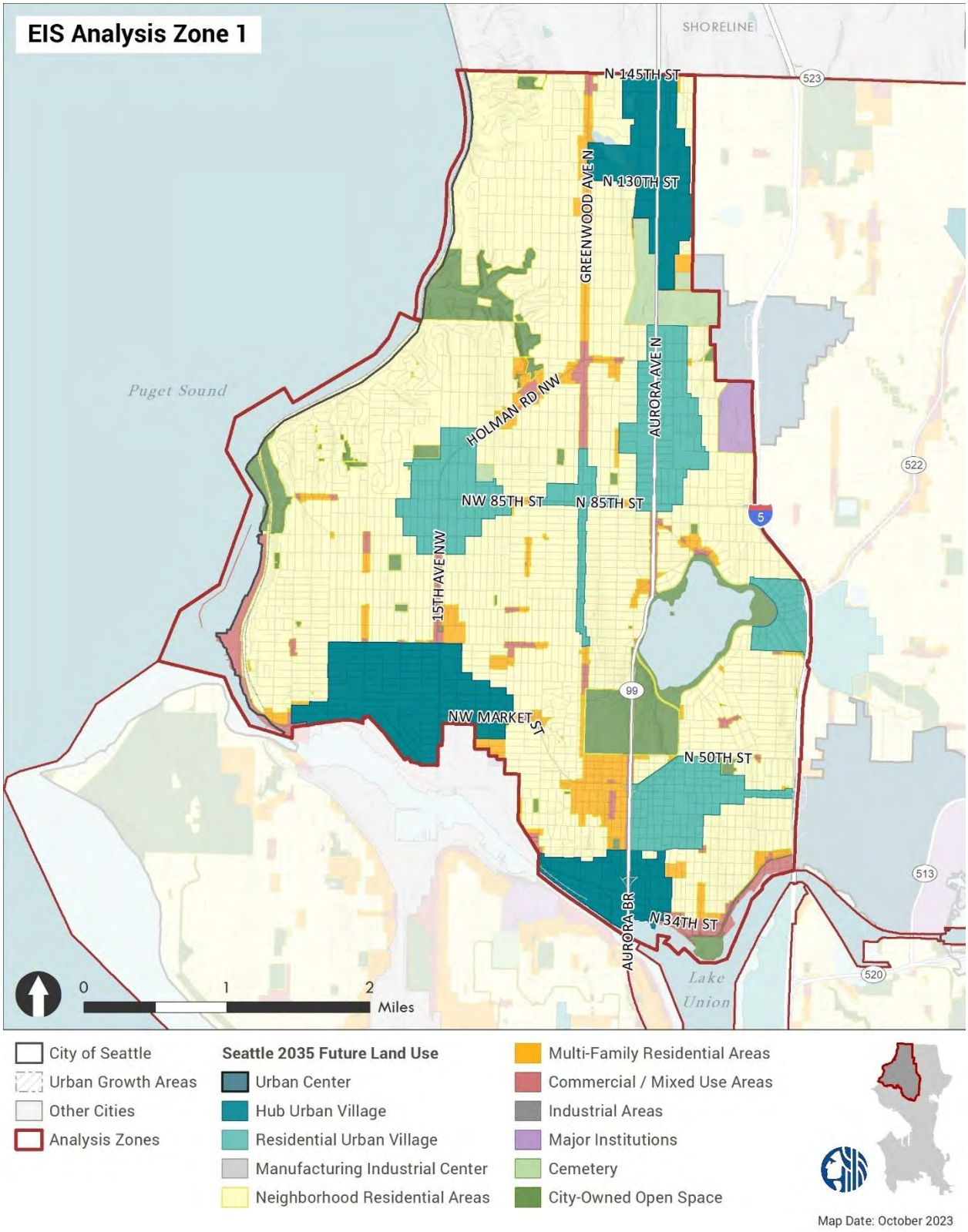
Future Land Use, Zoning, & Shorelines

Area 1 includes the northwest portion of Seattle that is west of I-5 and north of the Lake Washington Ship Canal. It includes approximately 7,151 acres of buildable lands, or 18% of the buildable lands citywide, and includes three hub urban villages and five residential urban villages: the Ballard, Bitter Lake, and Fremont hub urban villages and the Aurora-Licton Springs, Crown Hill, Green Lake, Greenwood-Phinney Ridge, and Wallingford residential urban villages. Most commercial, mixed-use, and lowrise multi-family future land use and zoning designations are concentrated in the urban villages with commercial designations generally adjacent to major arterials and lowrise multi-family designations on the edges of the urban village boundaries.

Outside of the urban villages, commercial, mixed-use, and multi-family future land use and zoning designations generally follow major arterials including SR 99, Greenwood/Phinney Ave N, and 15th Ave NW/Holman Rd NW. A small portion of the land along the north shore of Lake Union is designated and zoned industrial. Major parks and open space in the area include Woodland Park Zoo, Green Lake Park, Golden Gardens, Carkeek Park, and Gas Works. North Seattle College is also located adjacent to I-5 in the central eastern portion of the analysis area. Neighborhood residential future land use and zoning designations fill in the intervening areas. Future land use and zoning acreage within the analysis area are detailed in **Exhibit 3.6-14** and **Exhibit 3.6-16** and mapped in **Exhibit 3.6-25** and **Exhibit 3.6-26**.

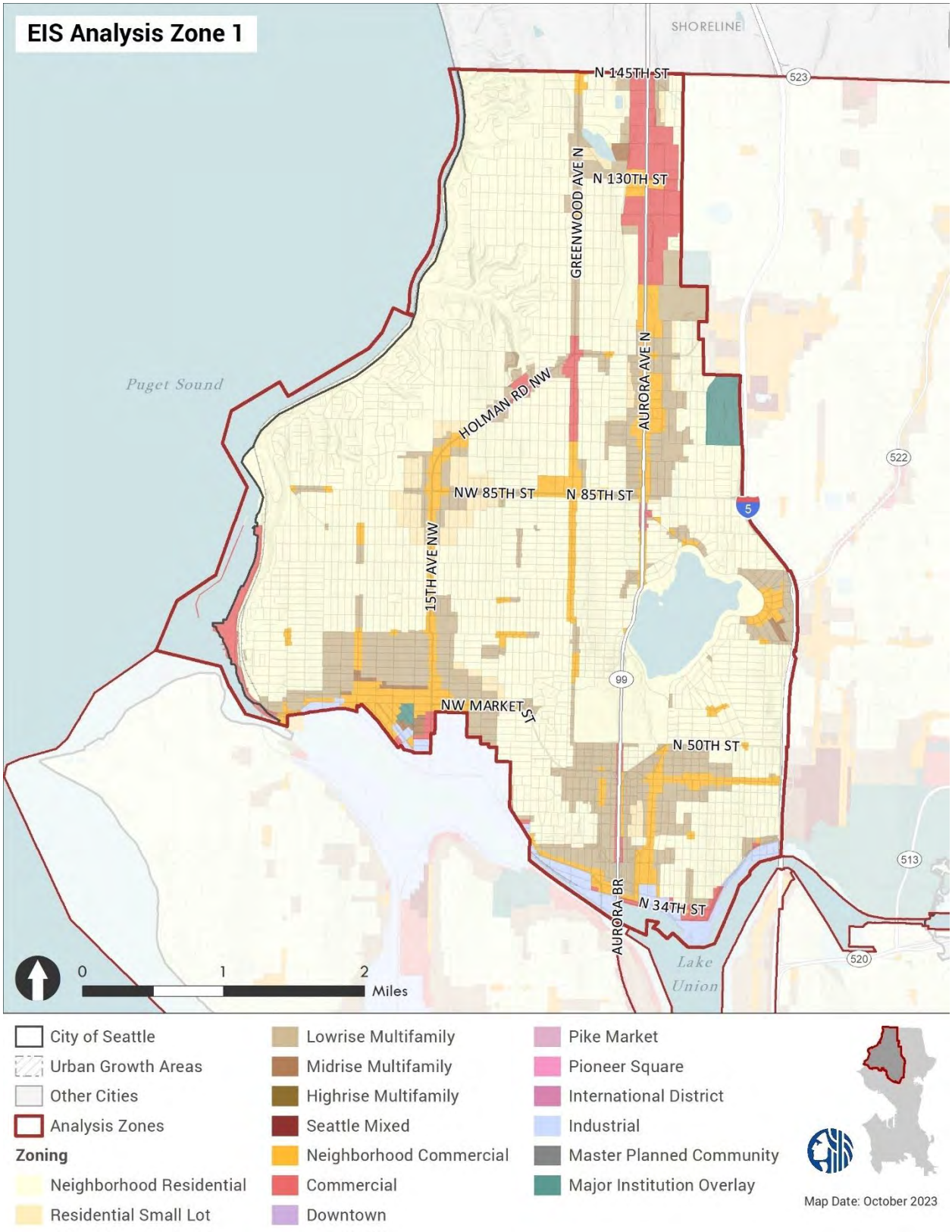
Area 1 includes about 14% of the city's designated shoreline district (1,045 acres). A little over two-thirds of this area is within a conservancy shoreline environment, including Conservancy Management (32%) in Green Lake and a combination of Conservancy Preservation (14%) and Recreation (13%) on Puget Sound from Golden Gardens north to the city limit. Another 29% of this area is designated Urban Commercial (near Shilshole Bay), Urban Maritime (along the north shore of Lake Union), and Urban Residential (inland along Puget Sound north of Golden Gardens). Designated shoreline acreage within the analysis area is detailed in **Exhibit 3.6-18** and mapped in **Exhibit 3.6-27.**

Exhibit 3.6-25. Area 1: NW Seattle—Future Land Use Designations



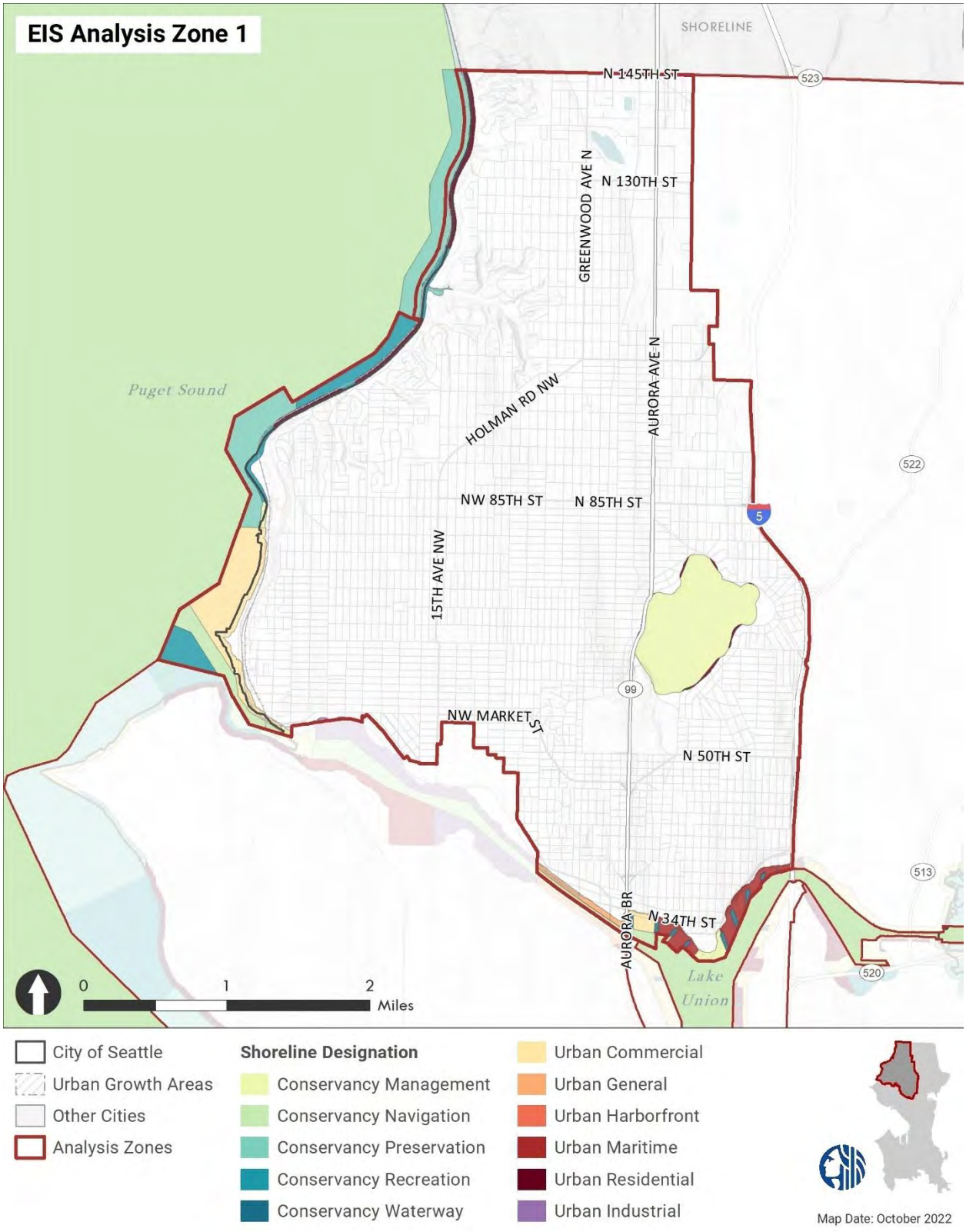
Source: City of Seattle, 2022; BERK, 2022.

Exhibit 3.6-26. Area 1: NW Seattle—Zoning



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

Exhibit 3.6-27. Area 1: NW Seattle—Shoreline Designations



Source: City of Seattle, 2022; BERK, 2022.

Existing Land Use & Urban Form

Existing Uses

The largest existing land use category is single family residential, which comprises about 57% of existing uses (versus 48% citywide). A slightly higher percentage of land uses are also multi-family residential (12% versus 9% citywide). Existing commercial, mixed-use, and multi-family uses as well as community assets are primarily within the urban village boundaries, with the densest concentrations in the Ballard, Bitter Lake, and Fremont hub urban villages. Commercial uses in Bitter Lake are typically larger-scale big-box retailers while those in Ballard and Fremont are smaller scale. Additional concentrations of commercial, mixed-use, and multi-family uses run adjacent to major roadways between the urban villages and along the Lake Washington Ship Canal and Shilshole Bay.

Most industrial uses in the analysis area are near Lake Washington Ship Canal in Ballard and along the north shore of Lake Union or on SR 99 in the Bitter Lake and Aurora-Licton Springs urban villages. The BNSF railway also runs along Puget Sound throughout the analysis area.

Current land use acreage is detailed in **Exhibit 3.6-19** and mapped in **Exhibit 3.6-28**.

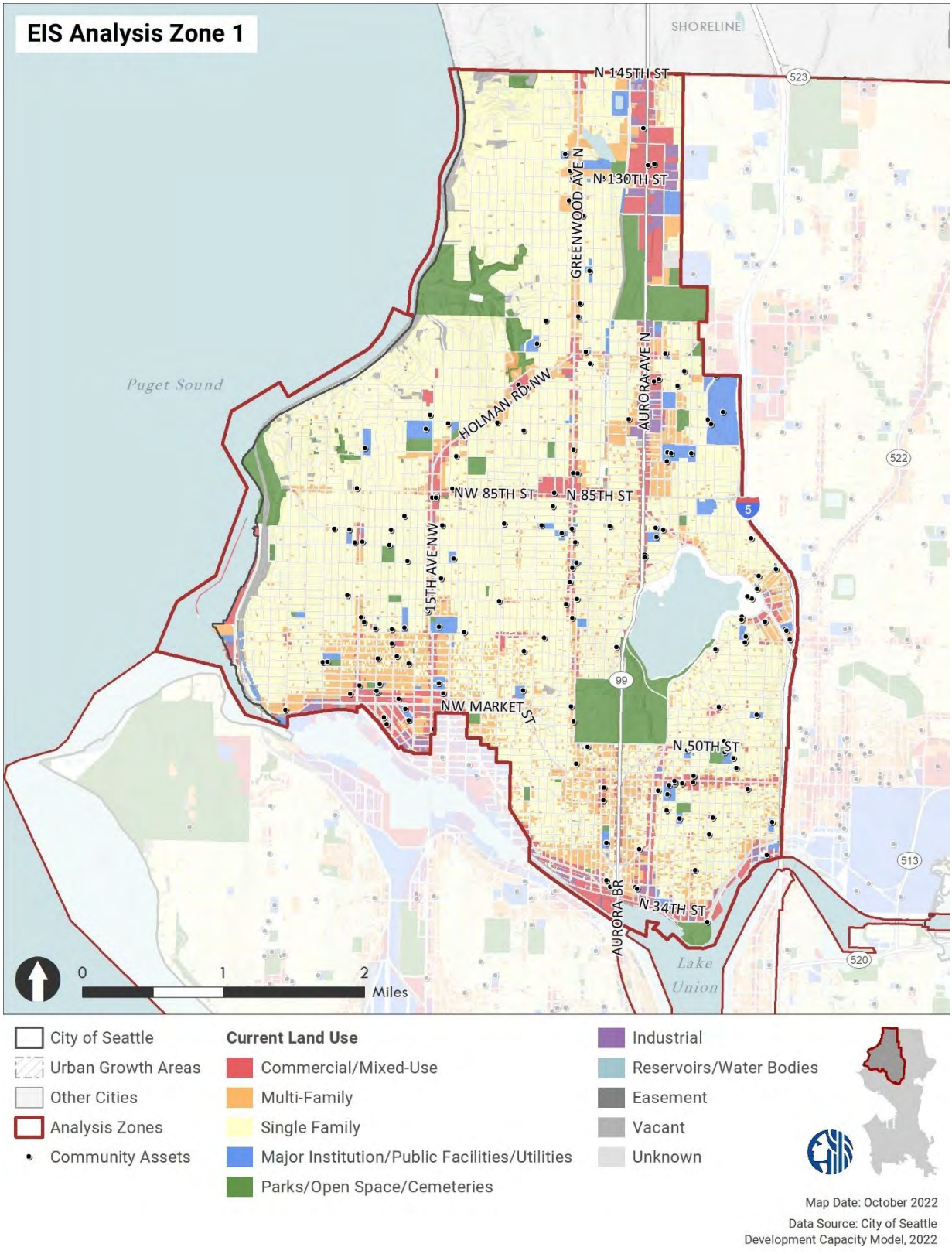
General Urban Form

Areas north of 85th St were largely developed prior to annexation to the City of Seattle in 1954. These areas tend to have a more automobile-oriented character than areas further south; in many places sidewalks are absent, and buildings are designed around automobile access. These trends are especially pronounced on Aurora Ave/SR-99 where pedestrian-hostile design is compounded by long-term disinvestment in buildings and public facilities, creating an environment that can feel unsafe for many people. However, this harsh environment can also serve as a haven for those who have been pushed out of other areas of the city due to high housing costs.

Height

The tallest buildings in Area 1 are found in the Ballard, Fremont, and Bitter Lake urban villages. These three urban villages have a significant number of 6- to 8-story buildings located along and south of NW 56th St in Ballard, along N 34th St and Stone Way in Fremont, and along Aurora Ave in Bitter Lake. Additionally, there are some 5- to 6-story buildings along Greenwood Ave, 3- to 5-story buildings in the Green Lake Residential Urban Village, and 3-story townhomes in Crown Hill. However, most of the area is zoned neighborhood residential and has building heights of 1 to 2 floors.

Exhibit 3.6-28. Area 1: NW Seattle—Current Land Use



Source: City of Seattle, 2022; BERK, 2022.

Area 2: NE Seattle

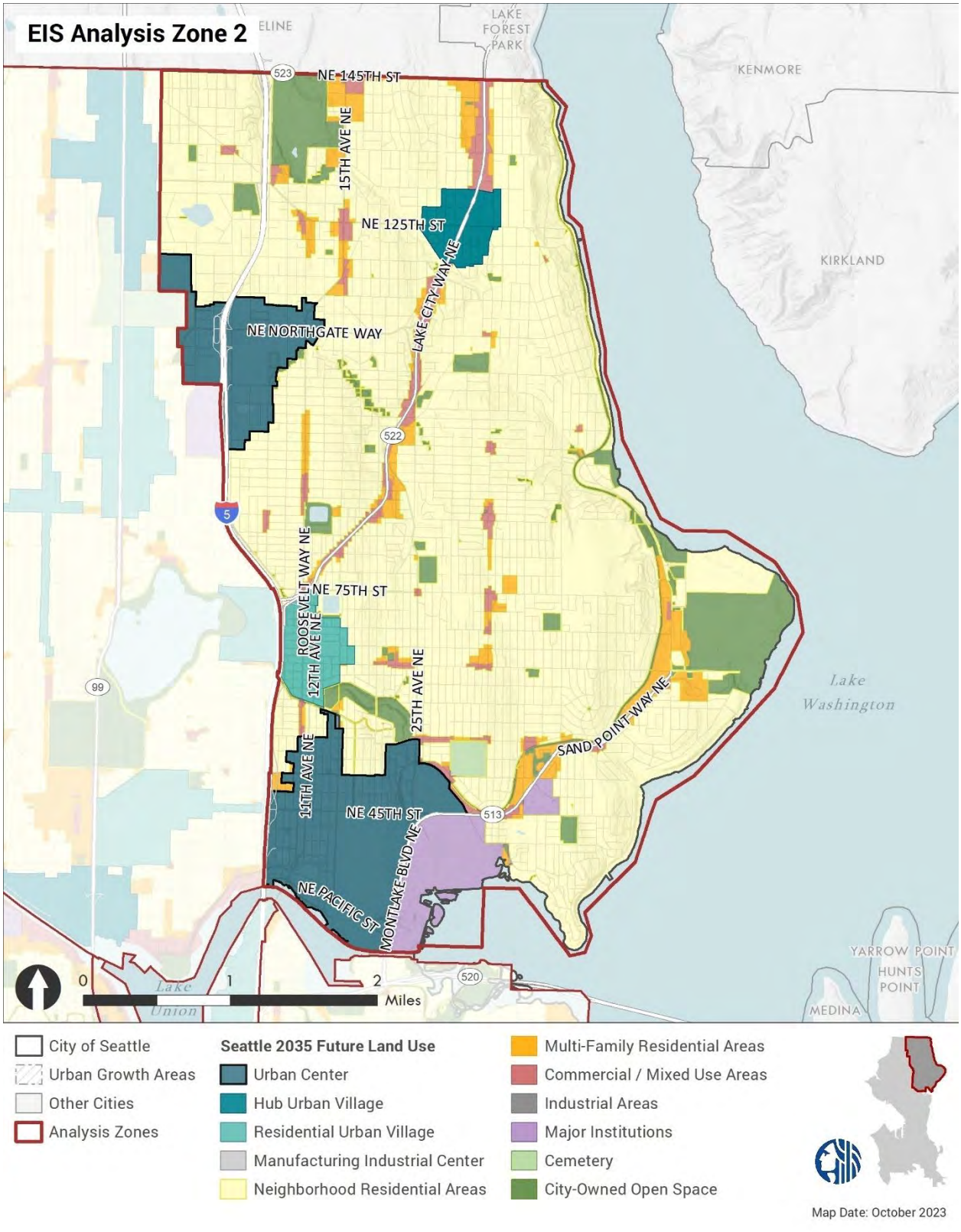
Future Land Use, Zoning, & Shorelines

Area 2 includes the northeast portion of Seattle east of Interstate 5, south of NE 145th Street (Seattle's northern most boundary), and north of Portage Bay and the Montlake Cut. It includes approximately 8,087 acres of buildable land, or 20% of the buildable lands citywide. Additionally, Area 2 includes the Northgate and University Community urban centers, the Lake City Hub Urban Village, and the Roosevelt Residential Urban Village. A majority of the commercial, mixed-use, and multi-family future land use and zoning designations are concentrated in the centers and villages with commercial and multi-family designations adjacent to major arterials running between center and village boundaries.

Outside of the centers and villages, commercial, mixed-use, and multi-family future land use and zoning designations generally follow Sandpoint Way NE, Lake City Way NE, Roosevelt Way NE, 15th Ave E, and 35th Ave NE. Major parks and open space in the area include Cowen and Magnuson Parks, the Calvary Cemetery, Sand Point County Club, and Jackson Park Golf Course. The University of Washington is located within a major institution overlay, which is a key regulatory feature of this subarea. Neighborhood residential future land use and zoning designations fill in the intervening areas. Future land use and zoning acreage within the analysis area are detailed in **Exhibit 3.6-14** and **Exhibit 3.6-16** and mapped in **Exhibit 3.6-29** and **Exhibit 3.6-30**.

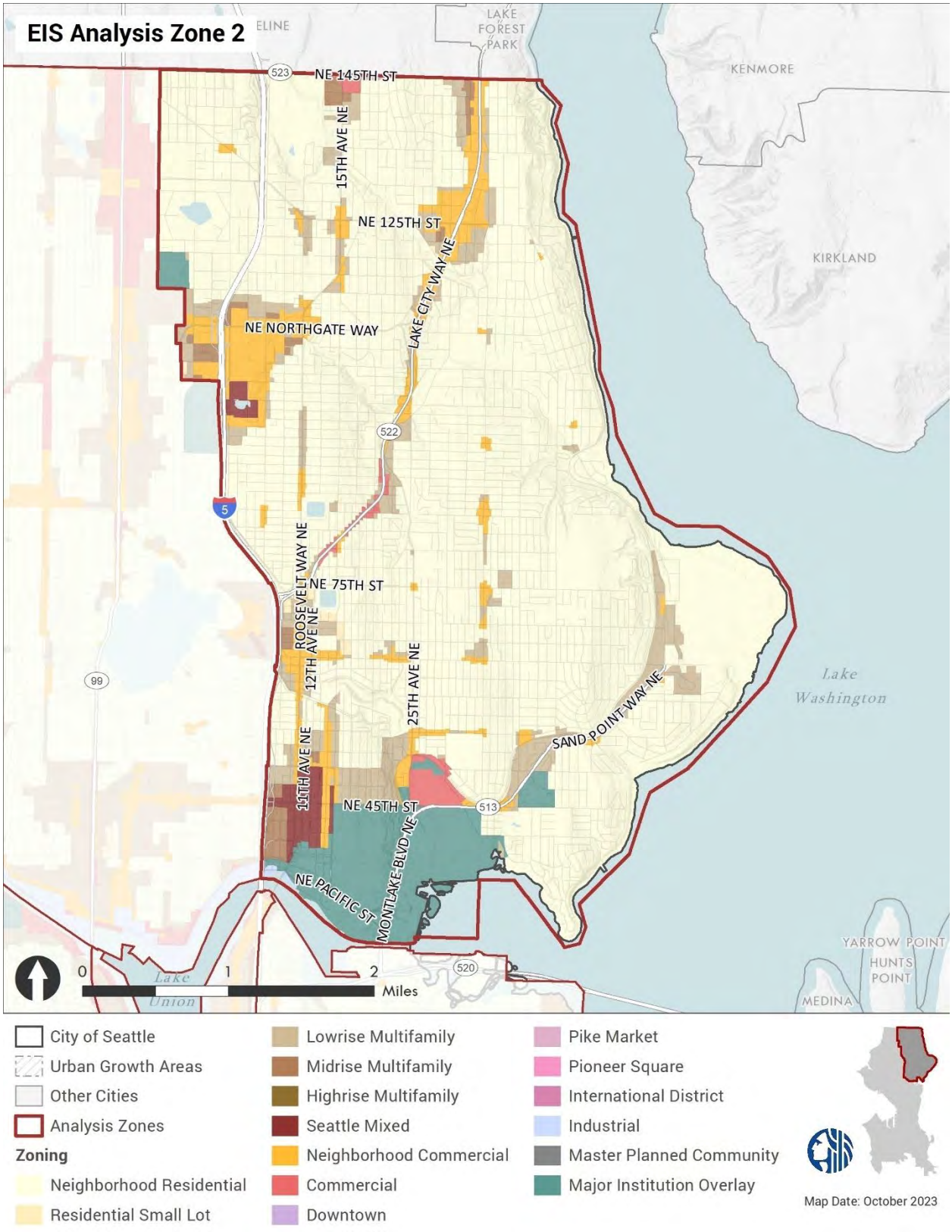
Area 2 includes about 10% of the city's designated shoreline district (761 acres). Nearly 75% of this area is within a conservancy shoreline environment, including Conservancy Management (11%) on the northern shoreline of Magnuson Park, Conservancy Preservation (26%) across the extent of Union Bay just SW of Laurelhurst neighborhood, and Conservancy Recreation (39%) on the eastern and southern shoreline of Magnuson Park. Another 19% are designated as Urban Residential extending north from Magnuson Park to the NE 145th St and south of Magnuson Park to the western most boundary of Laurelhurst. Designated shoreline acreage within the analysis area is detailed in **Exhibit 3.6-18** and mapped in **Exhibit 3.6-31**.

Exhibit 3.6-29. Area 2: NE Seattle—Future Land Use Designations



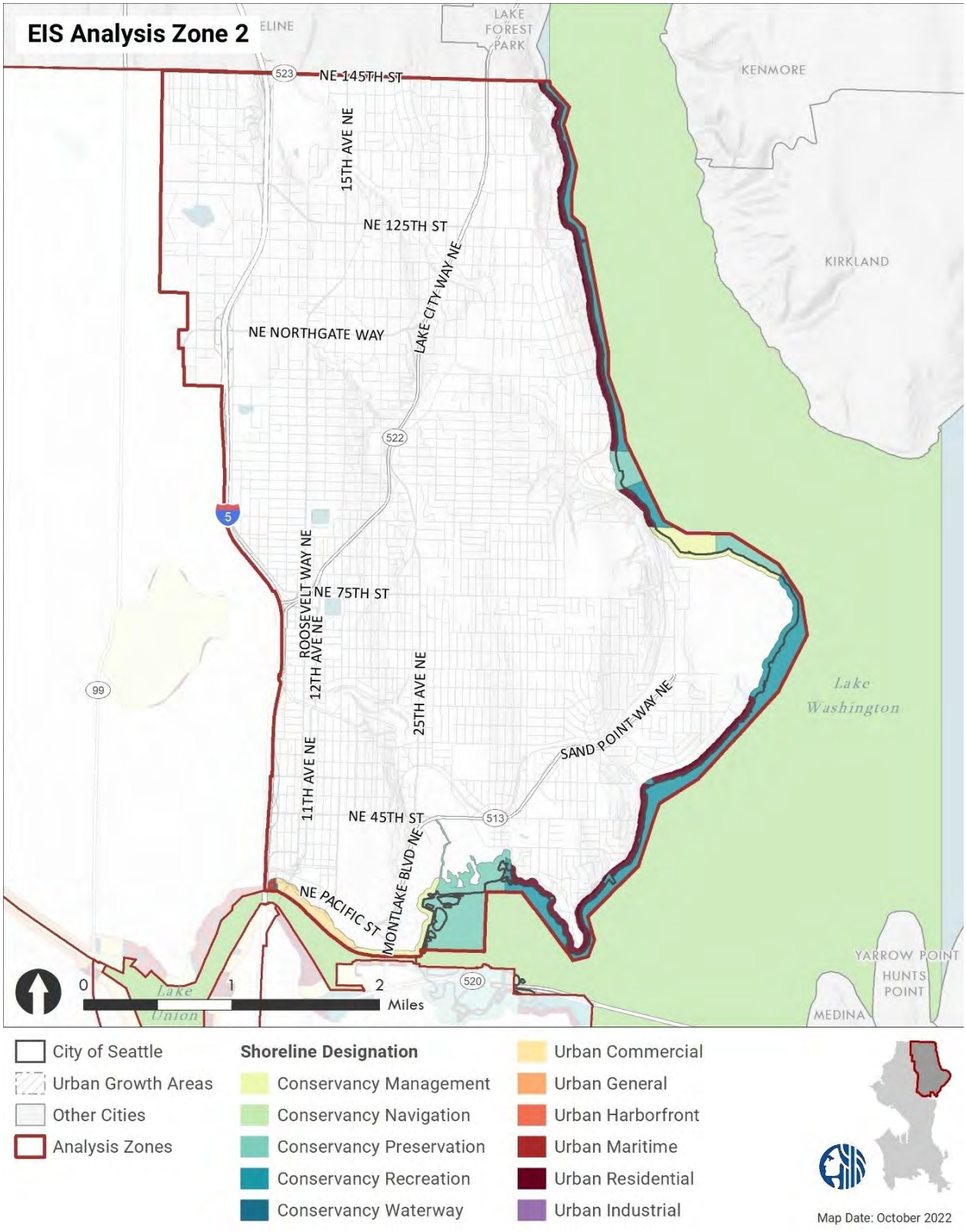
Source: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-30. Area 2: NE Seattle—Zoning



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

Exhibit 3.6-31. Area 2: NE Seattle—Shoreline Designations



Source: City of Seattle, 2022; BERK, 2022.

Existing Land Use & Urban Form

Existing Uses

The largest existing land use category is single family residential, which accounts for 59% of the land (versus 48% citywide). Existing commercial, mixed-use, and multi-family uses, as well as a majority of the community assets, are located within the existing center and village boundaries. Commercial and mixed uses found in the Roosevelt and Lake City urban villages are typically vertically dense apartment buildings with ground-floor commercial around a main commercial corridor that supports essential neighborhood amenities. In comparison, the University Community and Northgate urban centers have denser and more intensive land uses which are often at a greater scale than is found in urban villages. Outside of the center and village boundaries, commercial and multi-family development is concentrated along the extents of Sandpoint Way NE, Lake City Way NE, Roosevelt Way NE, 15th Ave E, and 35th Ave NE.

Major institutions and public facilities account for 13% of the existing land uses including the University of Washington and the National Oceanic and Atmospheric Administration Western Regional Center. Parks, open space, and cemeteries account for another 13% of the analysis area consisting of Cowen and Magnuson Parks, the Calvary Cemetery, Sand Point County Club, and Jackson Park Golf Course. The share of industrial land uses in the analysis area is lower than the city overall (0.4% versus 5%).

Current land use acreage is detailed in **Exhibit 3.6-19** and mapped in **Exhibit 3.6-32**.

General Urban Form

Areas north of NE 85th St (west of 20th Ave NE) and NE 65th St (east of 20th Ave NE) were largely developed prior to annexation to the City of Seattle in 1954. These areas tend to have a more automobile-oriented character than areas further south; in many places sidewalks are absent, and buildings are designed around automobile access. Lake City Way, a major arterial and designated state highway (SR 522), runs through the northern half of Area 2. The road has been upgraded and expanded continuously since it opened in 1909 and combines elements of separated highway, urban arterial, and commercial main street character. Because some segments have fewer design improvements to slow drivers, driver behavior can create a hostile and unpredictable pedestrian environment in Lake City Way's neighborhoods and business districts.

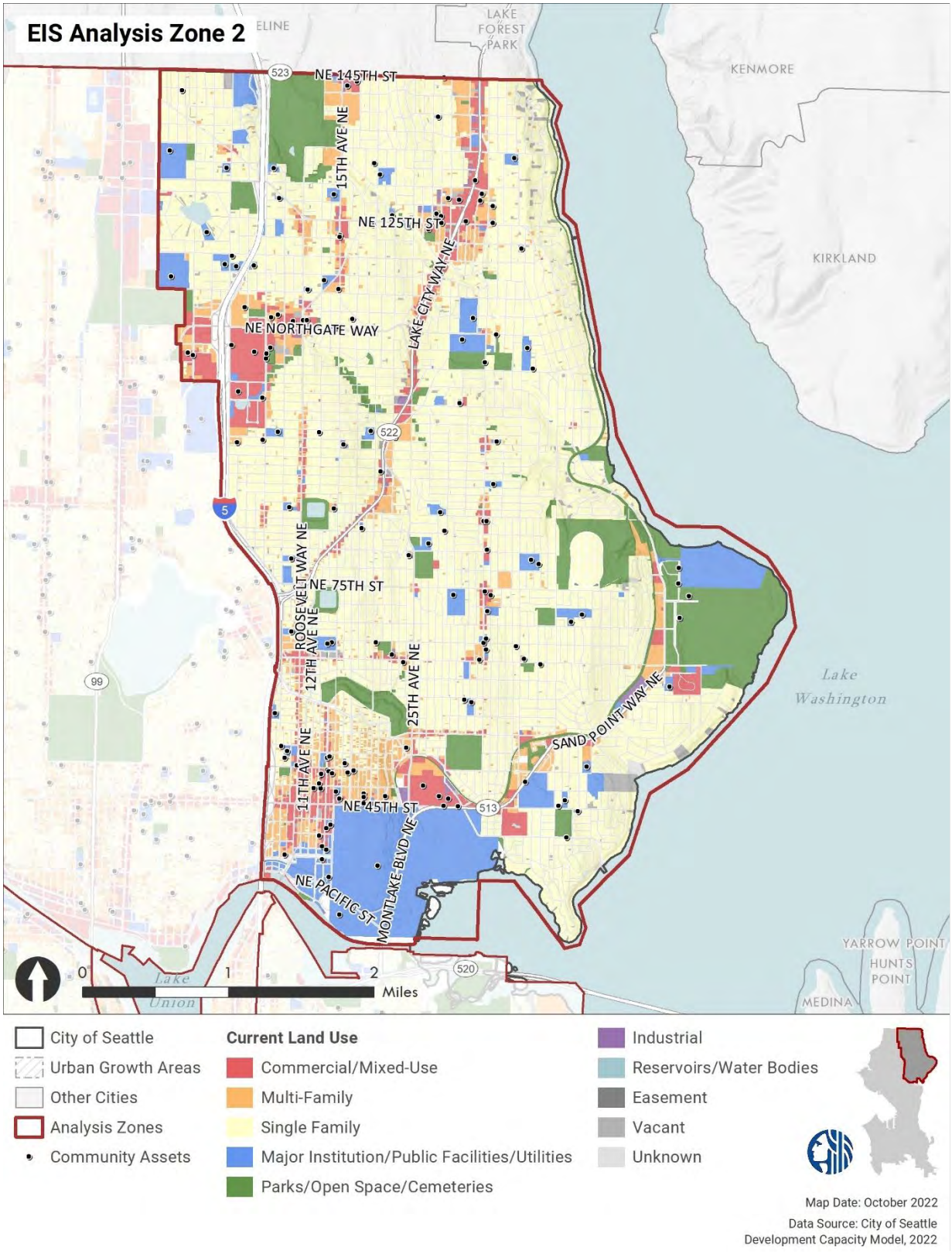
Heights

Building heights in the Northgate Urban Center, Lake City Hub Urban Village, and around the Roosevelt light rail station are between 6- to 8-stories, while the University Community Urban Center is experiencing high-rise development of buildings twenty stories or more. The rest of the analysis area is predominantly 1- to 2-story buildings.

Transitions

A major transition between intensities occurs between the University Community Urban Center and low-density residential areas to the north.

Exhibit 3.6-32. Area 2: NE Seattle—Current Land Use



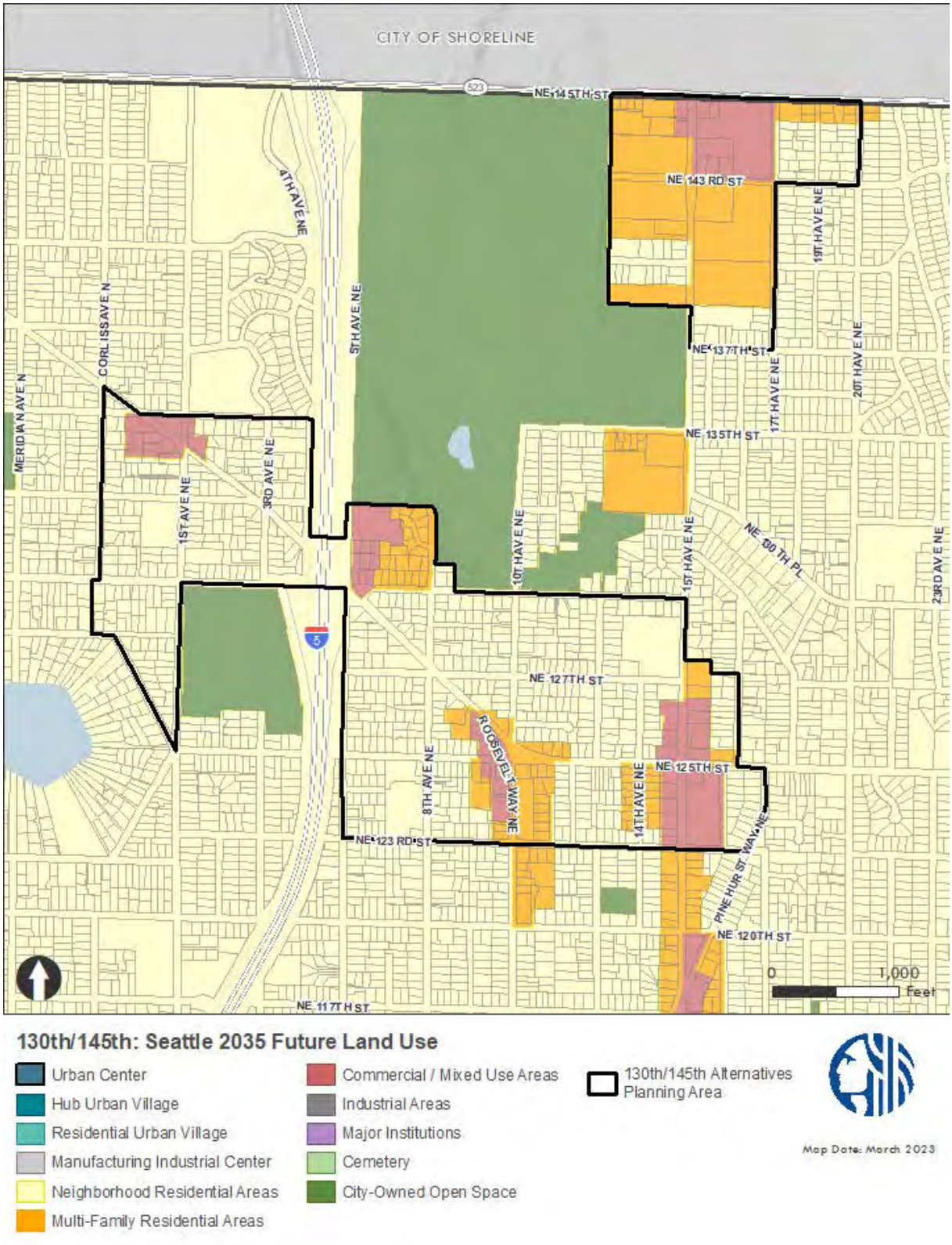
Source: City of Seattle, 2022; BERK, 2022.

130th/145th Station Area

Future Land Use, Zoning, & Shorelines. Future land use and zoning in the 130th Station Area is primarily neighborhood residential with some commercial, mixed-use, and multi-family designations near 130th Street and Roosevelt Way to the east of I-5 and around 125th Street. Future land use and zoning in the 145th Station Area is primarily commercial, mixed-use, and multi-family along 15th Ave with some neighborhood residential on the station area perimeter. There are no designated shorelines in either station area. See **Exhibit 3.6-33** and **Exhibit 3.6-34**.

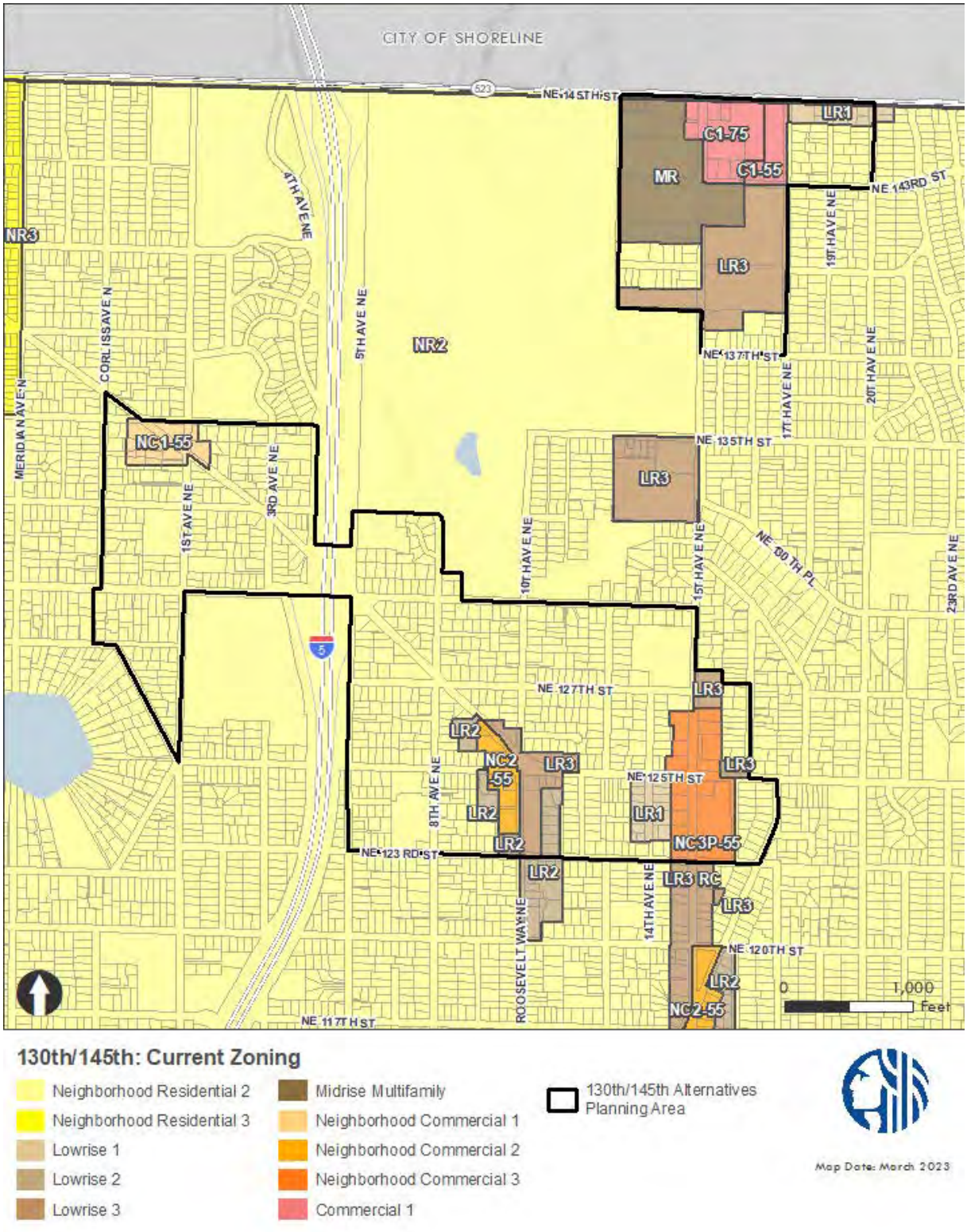
Existing Land Use. Existing commercial, mixed-use, and multi-family uses are concentrated around 130th Street and Roosevelt Way to the east of I-5, around 125th Street and 15th Ave, and within the 145th Station Area. These generally consist of single-story commercial or 3-4 story multi-family development with a limited amount of mixed-use near Roosevelt and 125th Street. A portion of the Jackson Park Golf Course is within both station areas. Other parks and open space in the 130th Station Area include Northacres Park, the Flicker Haven and Licorice Fern Natural Areas on Thornton Creek, and the eastern edge of Haller Lake (which is surrounded by single family development but is accessible by a public street end on the west of the lake outside the Station Area). Billings Middle School, Lakeside Middle School, and several churches are also within the 130th Station Area. Single family uses fill in the intervening areas and comprise the majority of the 130th Station Area. See **Exhibit 3.6-35**.

Exhibit 3.6-33. 130th/145th Station Area—Future Land Use Designations



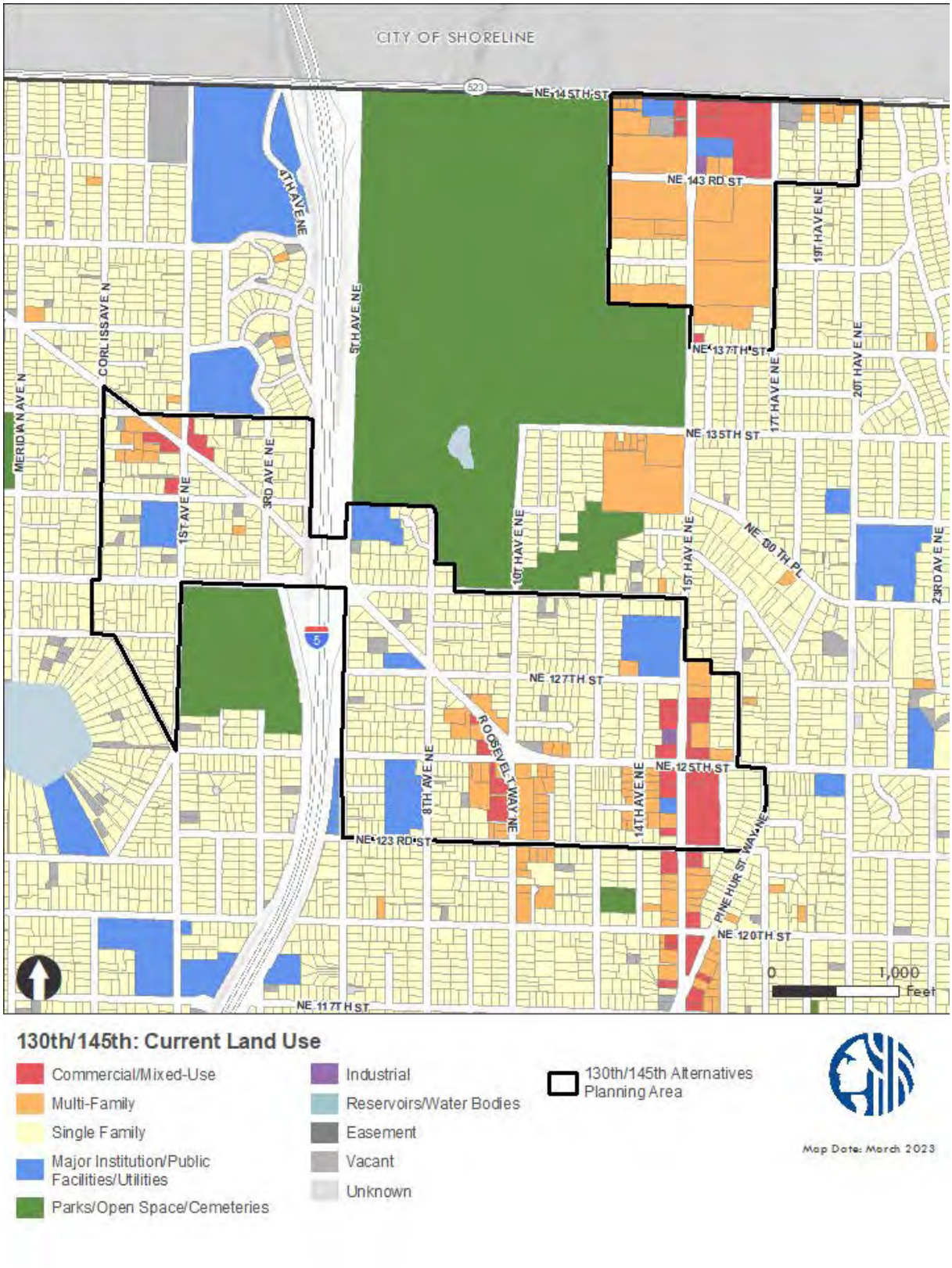
Sources: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-34. 130th/145th Station Area—Current Zoning



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

Exhibit 3.6-35. 130th/145th Station Area—Current Land Use



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

Heights. Buildings around the 130th light rail station are mostly 1- and 2-story as much of the area is zoned neighborhood residential. At the 145th bus rapid transit station, building south of 145th are mostly 3-story apartments. Additionally, close to the 130th station is the Pinehurst area, where the tallest buildings are 3- and 4-story buildings. See **Exhibit 3.6-36**.

Exhibit 3.6-36. Typical Buildings in the 130th/145th Station Area



Source: MAKERS, 2023.

Views. Although no SEPA-protected views exist in the area, the 8th Ave NE right-of-way/utility corridor provides a unique view looking north into Jackson Park. See **Exhibit 3.6-37**.

Exhibit 3.6-37. 8th Ave NE View to Jackson Park



Source: MAKERS, 2023.

Area 3: Queen Anne/Magnolia

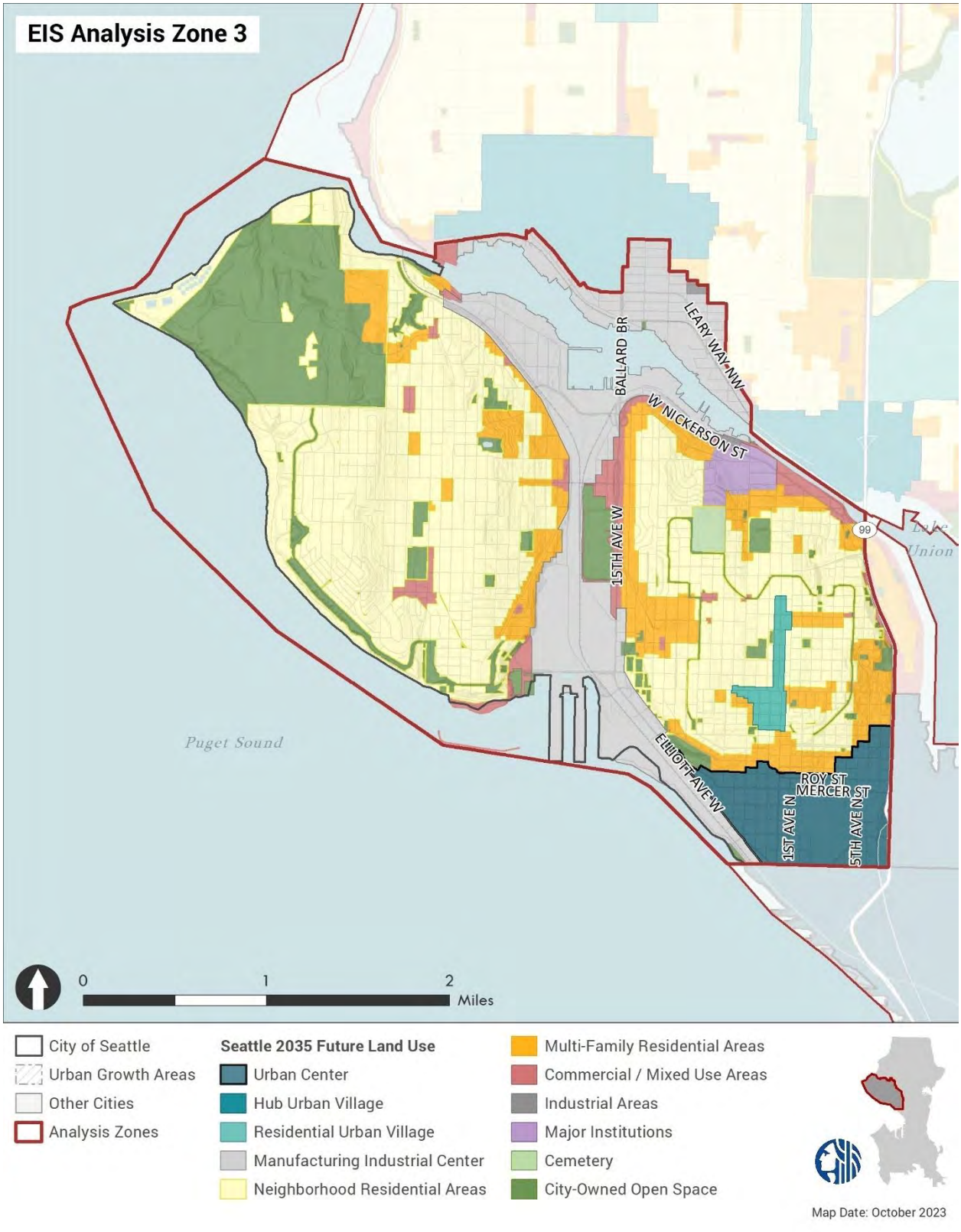
Future Land Use, Zoning, & Shorelines

Area 3 includes the portion of Seattle that is west of State Route 99, north of Denny Way, and south of the Lake Washington Ship Canal as well as the lands in the BINMIC that are north of the Lake Washington Ship Canal. It includes approximately 4,075 acres of buildable lands, or 10% of the buildable lands citywide. In addition to the BINMIC, Area 3 also includes the Uptown Urban Center and the Upper Queen Anne Residential Urban Village.

Topography plays a role in future land use designations within this analysis area. The crest of the Magnolia and Queen Anne neighborhoods support commercial/mixed-use and multi-family residential uses along a primary commercial corridor. Commercial/mixed-use designations are centered at the intersection of 32nd Ave W and W McGraw St in Magnolia, organized along Queen Anne Ave N in Upper Queen Anne Residential Urban Village, and along Mercer St in the Uptown Urban Center. Multi-family residential designations are located at the foot of both hills, lying between the neighborhood residential areas and the industrial uses in the BINMIC. Future land use and zoning acreage within the analysis area are detailed in **Exhibit 3.6-14** and **Exhibit 3.6-16** and mapped in **Exhibit 3.6-38** and **Exhibit 3.6-39**.

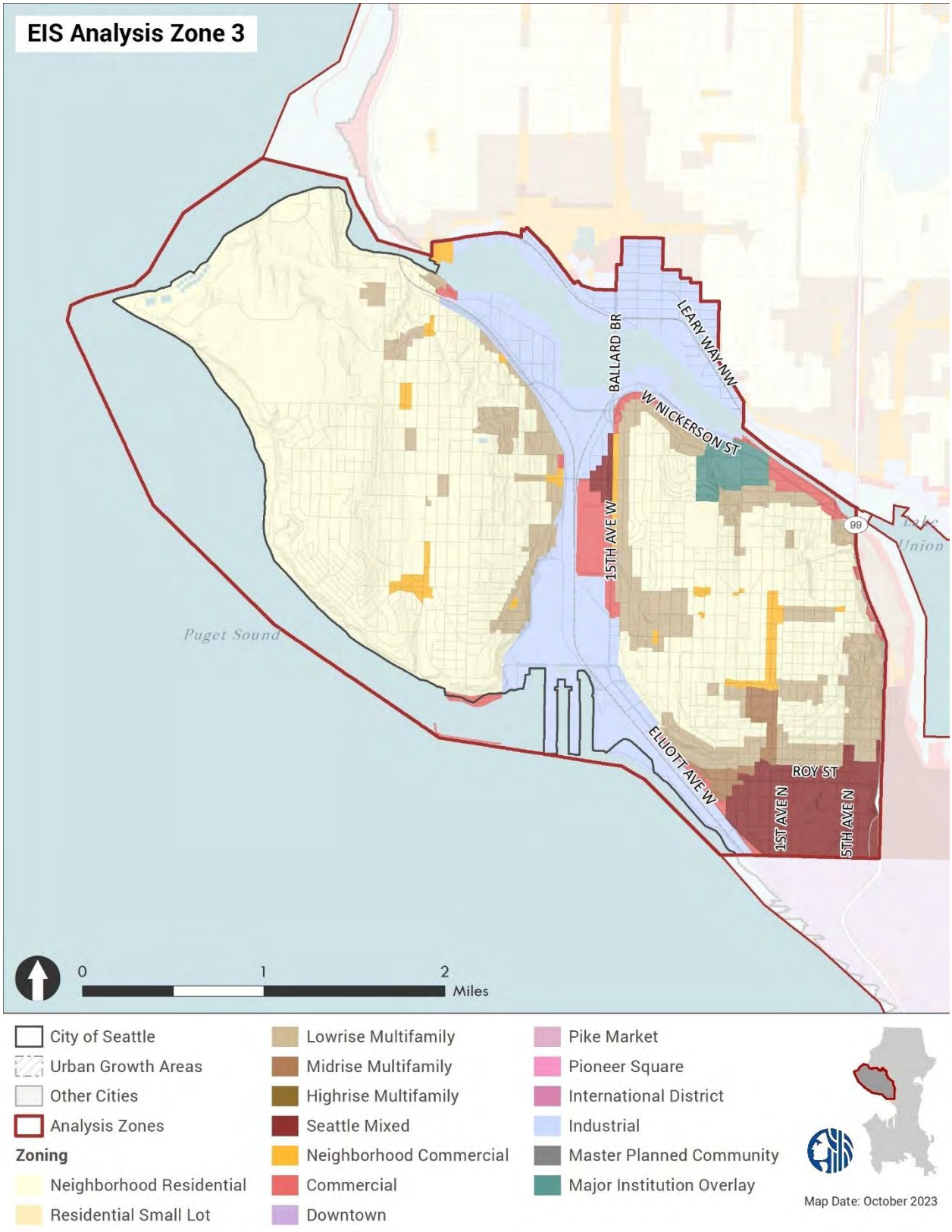
Area 3 includes about 24% of the city's designated shoreline district (1,772 acres). Nearly three-quarters of this area is within a conservancy shoreline environment, including Conservancy Management (10%) east of the Ballard Locks and on both sides of the Smith Cove Waterway, Conservancy Navigation (8%) along the Lake Washington Ship Canal, and a mix of Conservancy Preservation (35%) and Conservancy Recreation (19%) following the shoreline along the Magnolia neighborhood. Another 17% is designated Urban Industrial on the north shore of the Lake Washington Ship Canal and surrounding Smith Cove Waterway and 6% is designated as Urban Maritime near Fisherman's Terminal. Designated shoreline acreage within the analysis area is detailed in **Exhibit 3.6-18** and mapped in **Exhibit 3.6-40**.

Exhibit 3.6-38. Area 3: Queen Anne/Magnolia—Future Land Use Designations



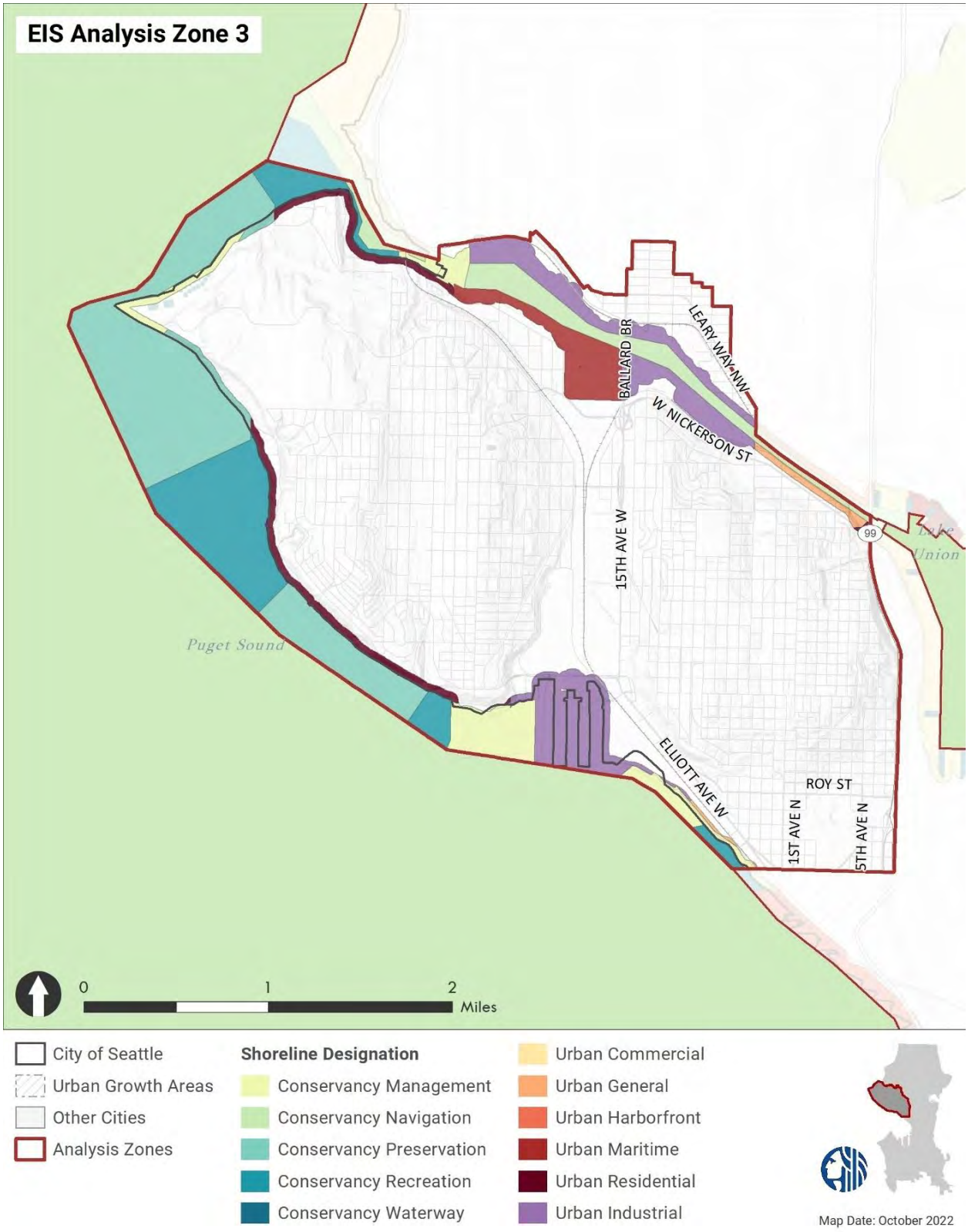
Source: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-39. Area 3: Queen Anne/Magnolia—Zoning



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

Exhibit 3.6-40. Area 3: Queen Anne/Magnolia—Shoreline Designations



Source: City of Seattle, 2022; BERK, 2022.

Existing Land Use

Existing Uses

The largest existing land use category is single family residential which accounts for 35% of existing uses versus 48% citywide. A higher share of commercial/mixed-use land uses are present in the study area (13%) compared to the 8% citywide. Commercial/mixed-use land uses are centered in the Uptown Urban Center and the Upper Queen Anne Residential Urban Village with a smaller portion allocated in the Magnolia Village along the W McGraw St commercial corridor. Mixed-use buildings in the centers and villages are typically organized around a liner commercial corridor and consist of 4- to 5-story residential buildings with ground floor retail.

Major institutions, public facilities, and utilities account for 12% of the existing uses primarily due to the presence of the BINMIC and Seattle Pacific University. Parks, open space, and cemeteries account for another 20% of the land uses in the analysis area. The largest uses in this category include Discovery Park, Interbay Athletic Complex, Mt. Pleasant Cemetery, and neighborhood parks including David Rodgers, Smith Cove, and Ella Bailey Parks.

Current land use acreage is detailed in **Exhibit 3.6-19** and mapped in **Exhibit 3.6-41**.

Heights

Area 3 has a pocket of taller 5- to 7-story buildings in the Uptown Urban Center and along Queen Anne Avenue. However, most of the area is zoned neighborhood residential and has building heights of 1 to 2 floors.

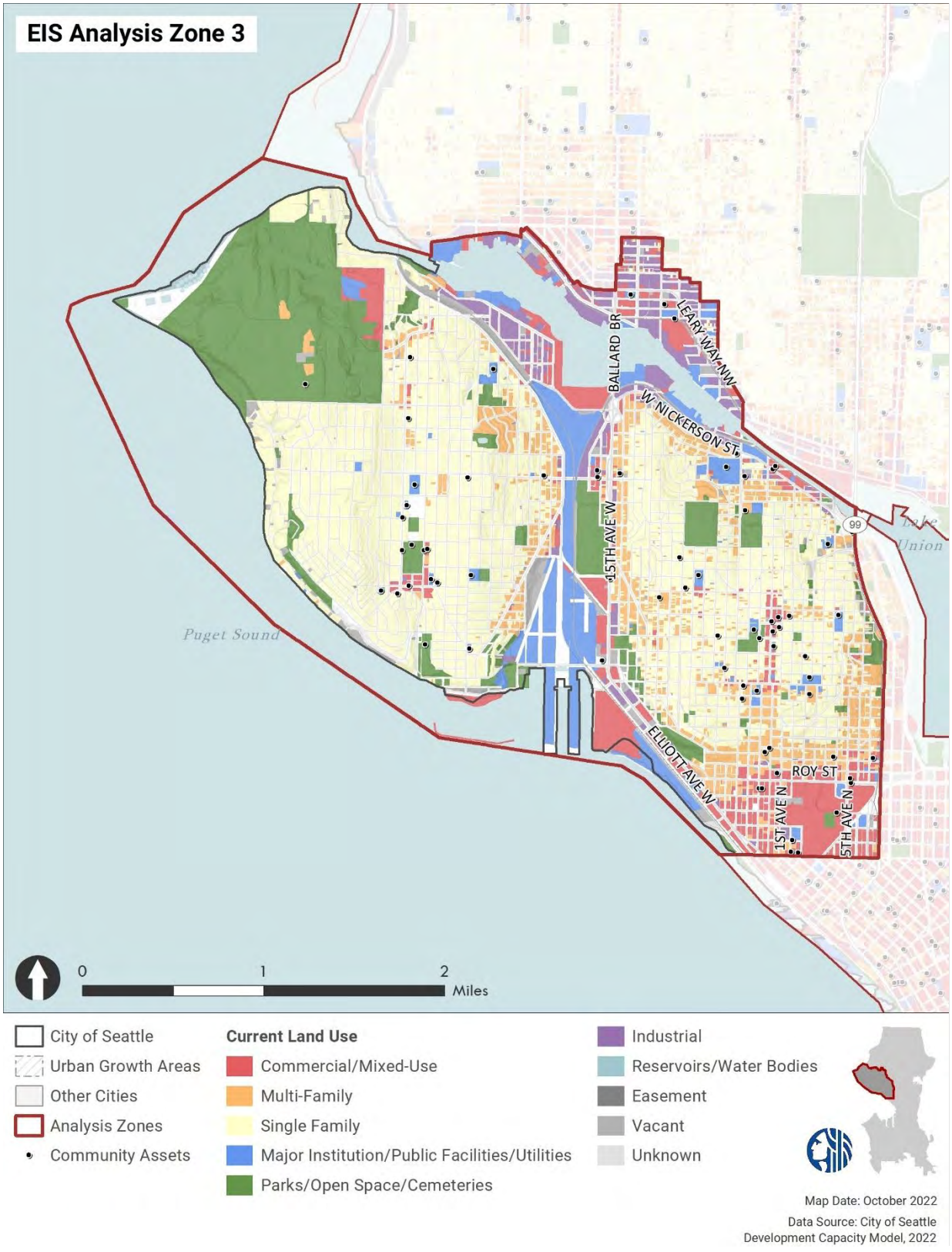
Transitions

The shift from the greater Downtown Urban Center north to lower density residential areas is a major transition in building intensity. However, this is likely to be mitigated by the steep south slope of Queen Anne hill, providing good access to light and views for even low-scale buildings. In Interbay, industrial uses abut residential areas that have seen increasing moderate density housing construction in recent years.

Shadows

The north side of Queen Anne Hill and Magnolia experience a shadier environment because of topography blocking southern sun exposure.

Exhibit 3.6-41. Area 3: Queen Anne/Magnolia—Current Land Use



Source: City of Seattle, 2022; BERK, 2022.

Area 4: Downtown/Lake Union

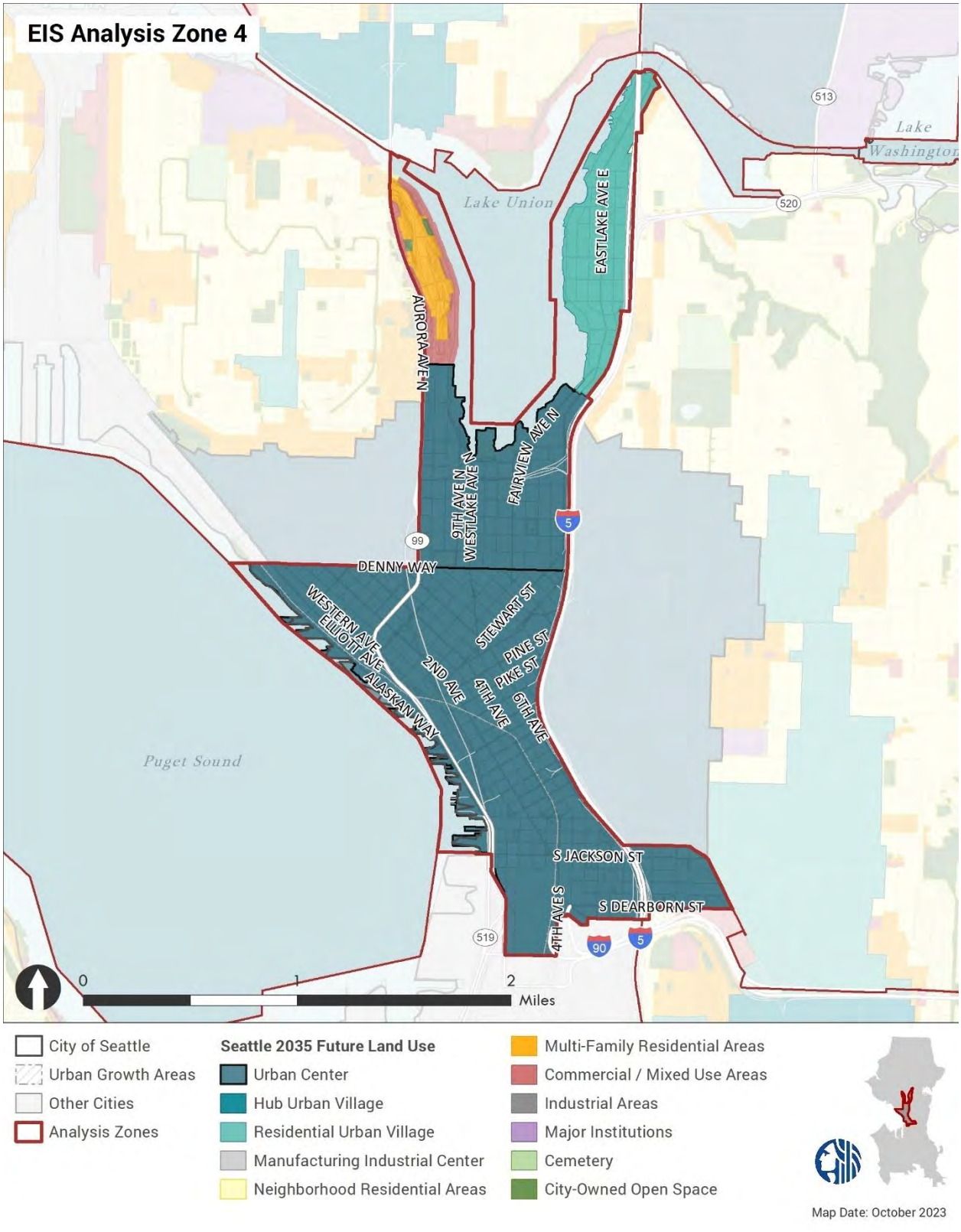
Future Land Use, Zoning, & Shorelines

Analysis Area 4 includes the portion of Seattle east of State Route 99, west of Interstate 5, and north of Interstate 90. The study area is also bounded by its shoreline fronting Elliott Bay and Lake Union. It includes approximately 1,033 acres of buildable lands, or 3% of the buildable lands citywide including the Downtown and South Lake Union Urban Centers and the Eastlake Residential Urban Village.

Four distinct future land use designations are present in the analysis area. The Downtown Urban Center, South Lake Union Urban Centers, and Eastlake Residential Urban Village account for nearly 90% of planned uses. Denny Way separates the Downtown Urban Center from the South Lake Union Urban Center. The remaining commercial/mixed use and multi-family designations are located east of Aurora Ave N and north of Galer Street in the Westlake neighborhood. Commercial/mixed-use designations are concentrated along Westlake Ave N and Aurora Ave N with multi-family residential future land use and zoning designations filling in the intervening areas. Future land use and zoning acreage within the analysis area are detailed in **Exhibit 3.6-14** and **Exhibit 3.6-16** and mapped in **Exhibit 3.6-42** and **Exhibit 3.6-43**.

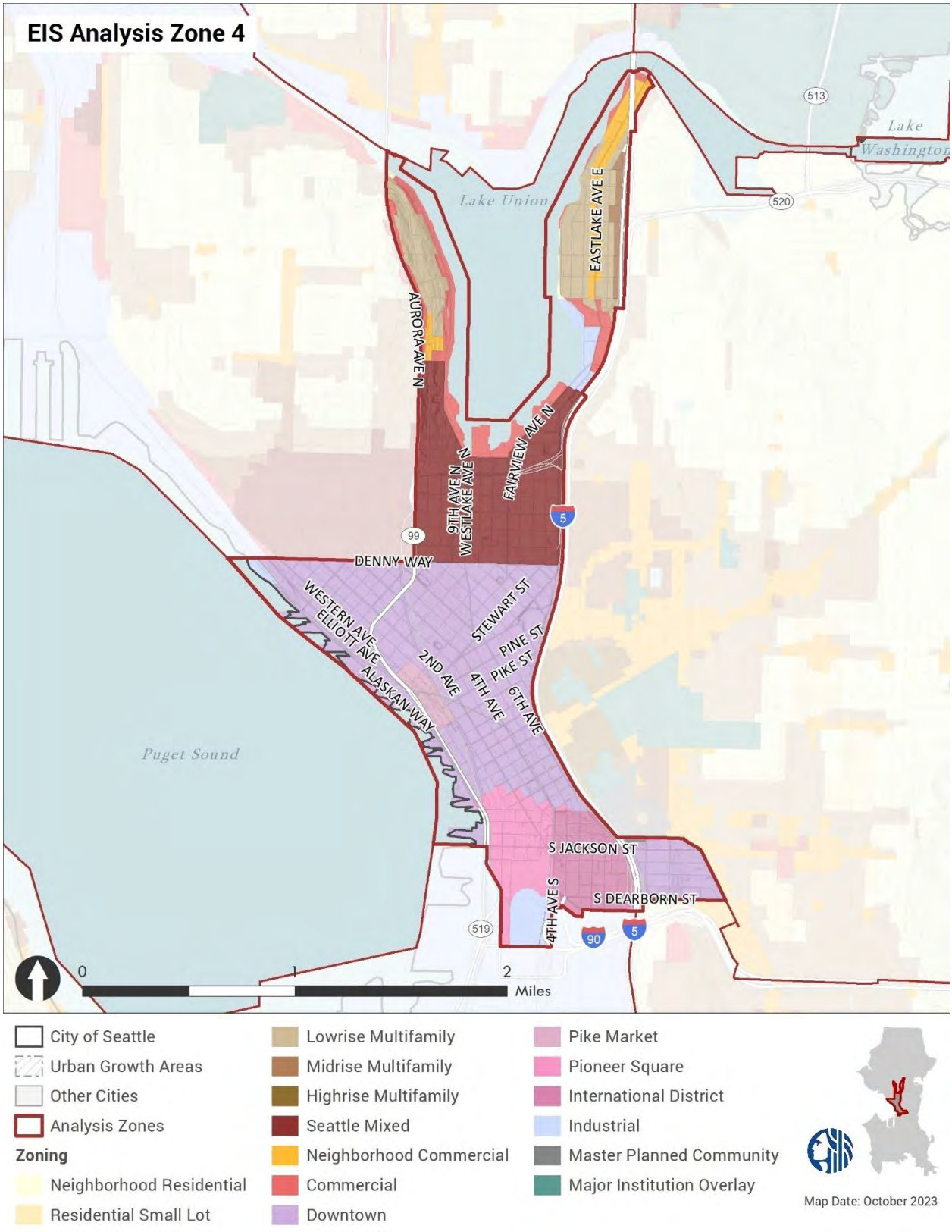
Analysis Area 4 includes about 5% of the city's designated shoreline district (390 acres). Less than 10% of this area is within a conservancy shoreline environment. A majority of the shoreline is designated as Urban including: Urban Commercial (41%) lining a majority of Lake Union from the Aurora Bridge to Lake Union Drydocks, followed by Urban Harborfront (33%) fronting Elliott Bay, Urban Marine (9%) in the southeastern corner of Lake Union, and Urban Residential (7%) on the eastside of Lake Union. Designated shoreline acreage within the analysis area is detailed in **Exhibit 3.6-18** and mapped in **Exhibit 3.6-44**.

Exhibit 3.6-42. Area 4: Downtown/Lake Union—Future Land Use Designations



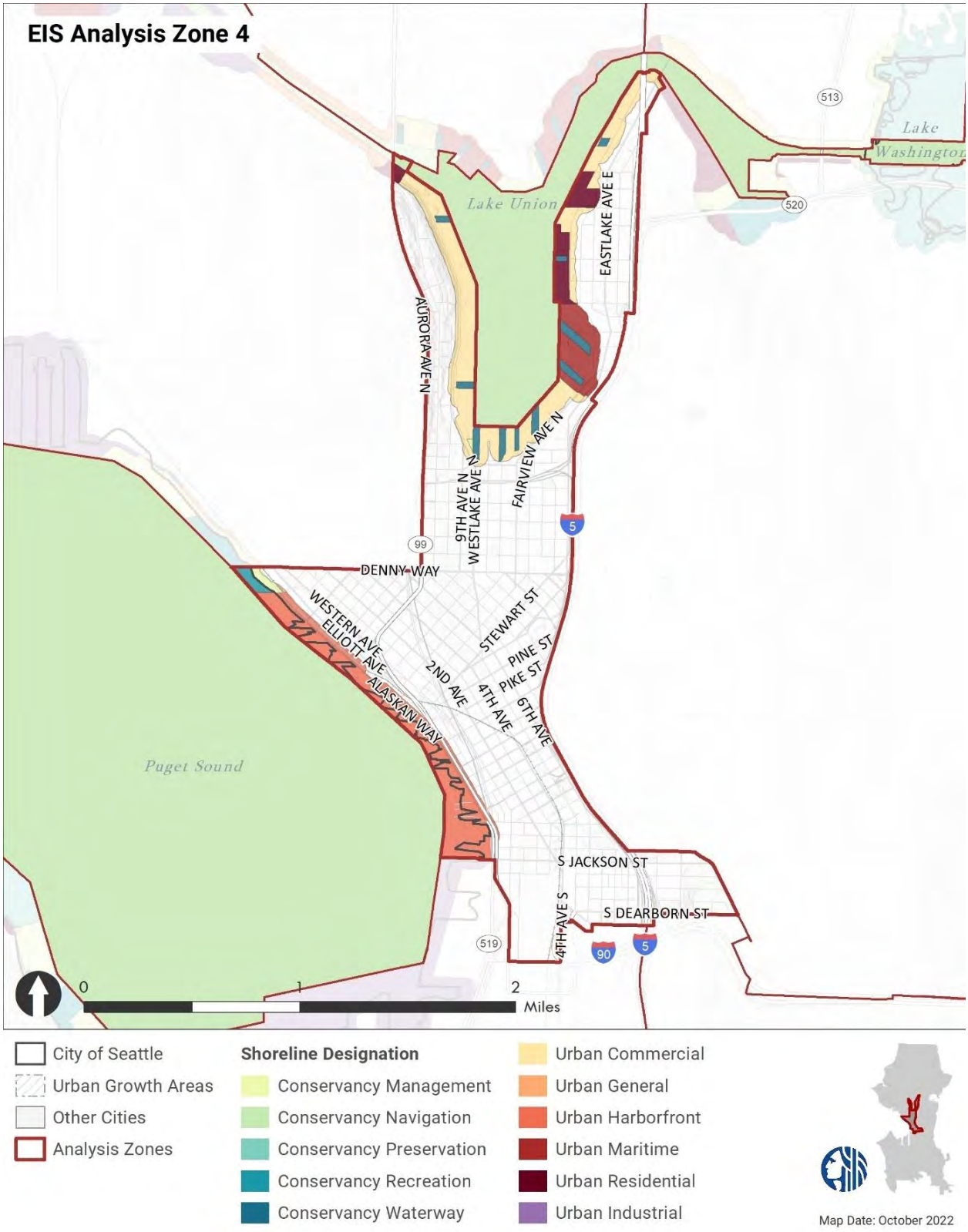
Source: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-43. Area 4: Downtown/Lake Union—Zoning



Source: City of Seattle, 2022; BERK, 2022.

Exhibit 3.6-44. Area 4: Downtown/Lake Union—Shoreline Designations



Source: City of Seattle, 2022; BERK, 2022.

Existing Land Use

Existing Uses

The largest existing land use category is commercial/mixed-use which accounts for 62.1% of existing uses versus 8.4% citywide. The analysis area includes the commercial and financial center of Seattle and houses its densest and tallest commercial and mixed-use buildings. Commercial/mixed-use land uses are centered in the Downtown and South Lake Union urban centers with a smaller portion of multi-family uses centered in the Belltown and Eastlake neighborhoods. The Eastlake Residential Urban Village has a main commercial corridor along Eastlake Ave E, which is buffered by multi-family and single family uses.

Major institutions, public facilities, and utilities account for 9% of existing uses in the analysis area, including the Seattle City Light Denny Substation, King County Courthouse, Administration and Detention facilities, and the Washington State Convention Center. Parks, open space, and cemeteries account for only 4% of current land uses in the analysis area compared to 14% citywide. The largest uses in this category include Lake Union Park, Denny Park, Cascade Playground, and part of the newly rehabilitated waterfront along Elliot Bay.

Current land use acreage is detailed in **Exhibit 3.6-19** and mapped in **Exhibit 3.6-45**.

General Urban Form

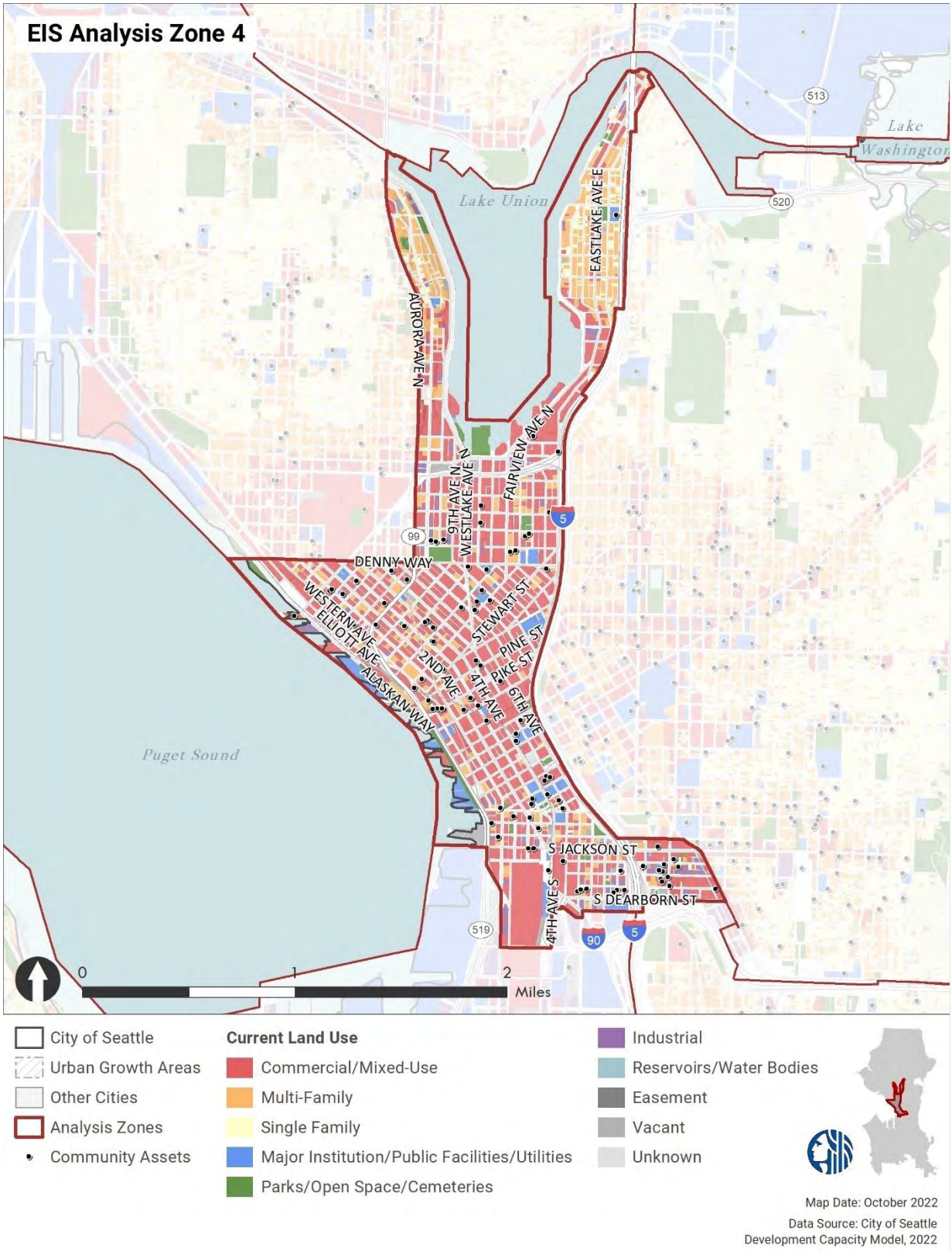
The urban form of Area 4 has deep roots, stretching back to the early days of Euro-American settlement, when settlers with different land claims laid out separate street grids, each oriented to the shoreline along their land claim. Today, most land in the area is heavily built out, and the dense grid of streets creates a well-connected, if automobile-dominated, dense urban environment.

During early settlement, the land claim south of Yesler Way emerged as a lively, diverse, rough-and-tumble neighborhood. Non-White communities were better able to find a foothold here than in other areas and Asian and Black communities established in Pioneer Square but were pushed east to areas that later became Chinatown, Japantown, and Little Saigon, (together Chinatown-International District or "CID") and the Central District.[25]

Chinatown-International District emerged with a unique urban form combining elements of western boomtown urbanism, with large, externally ornamented but internally utilitarian brick buildings replacing wooden structures, and Chinese and Japanese influences in decorative style and internal layout of buildings. Some of these buildings were developed by transcontinental mutual aid societies such as the Kong Yick Investment Company. Many Japanese people lost their homes and businesses in Japantown (bounded by 4th Ave S, S Jackson St, Yesler Way, and then as far east as 23rd Ave) during Japanese internment in the 1940s.

[25] The Forging of a Black Community, Quintard Taylor, 1994

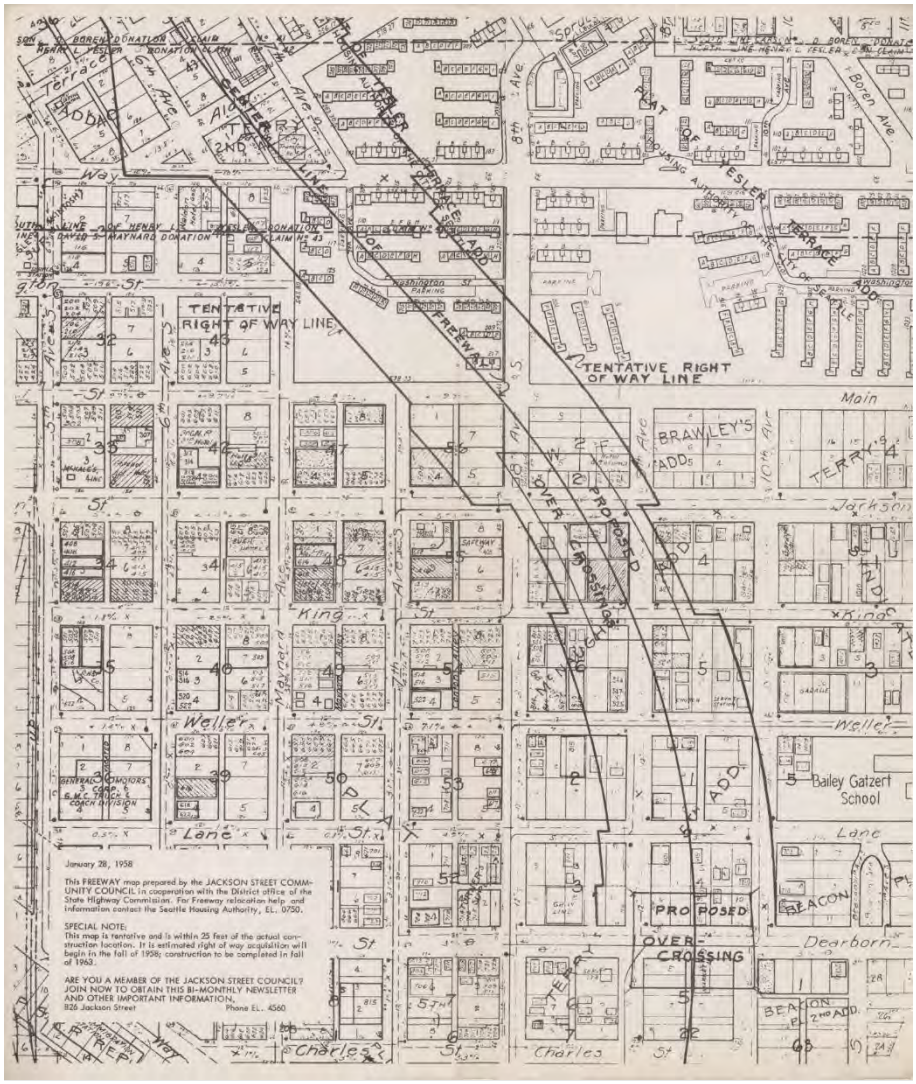
Exhibit 3.6-45. Area 4: Downtown/Lake Union—Current Land Use



Source: City of Seattle, 2022; BERK, 2022.

The area—with complex and changing demographics including Chinese, Japanese, Filipino, Black, and White communities—was significantly altered by the construction of I-5 in the 1960's, which involved the partial or complete demolition of 16 city blocks between Yesler Way and S Dearborn St and created a major sensory barrier between uphill and downhill parts of the neighborhood. Uphill portions of the neighborhood (now known as Little Saigon) were largely redeveloped with lower-density, auto-oriented buildings in the mid-20th century. These became a foothold for Vietnamese immigrant communities beginning in the late 1970's, where investments by Chinese-American and Vietnamese-American property owners and developers helped create a lively shopping district featuring semi-outdoor markets and repurposed strip mall-style buildings. See **Exhibit 3.6-46**, **Exhibit 3.6-47**, and the **Annexation & Regional Transportation Corridors** discussion above.

Exhibit 3.6-46. Proposed Path of I-5 Freeway in Chinatown-International District, 1958



Note: This map was used by the Jackson Street Community Council to raise awareness of businesses and homes that would be displaced by freeway construction.
Source: Wing Luke Museum.

Exhibit 3.6-47. Interstate 5 Construction through Chinatown-International District, 1966



Source: Washington State Archives.

Heights

Area 4 includes the densest area of Seattle, where Belltown, Denny Triangle, South Lake Union, and the Business District have a range of high-rises to skyscrapers. Area 4 also includes Westlake, with 5- to 7-story buildings throughout, and Eastlake, which has a mix of 4- and 5-story buildings, 3-story townhouses, and 2-story houseboats.

Area 5: Capitol Hill/Central District

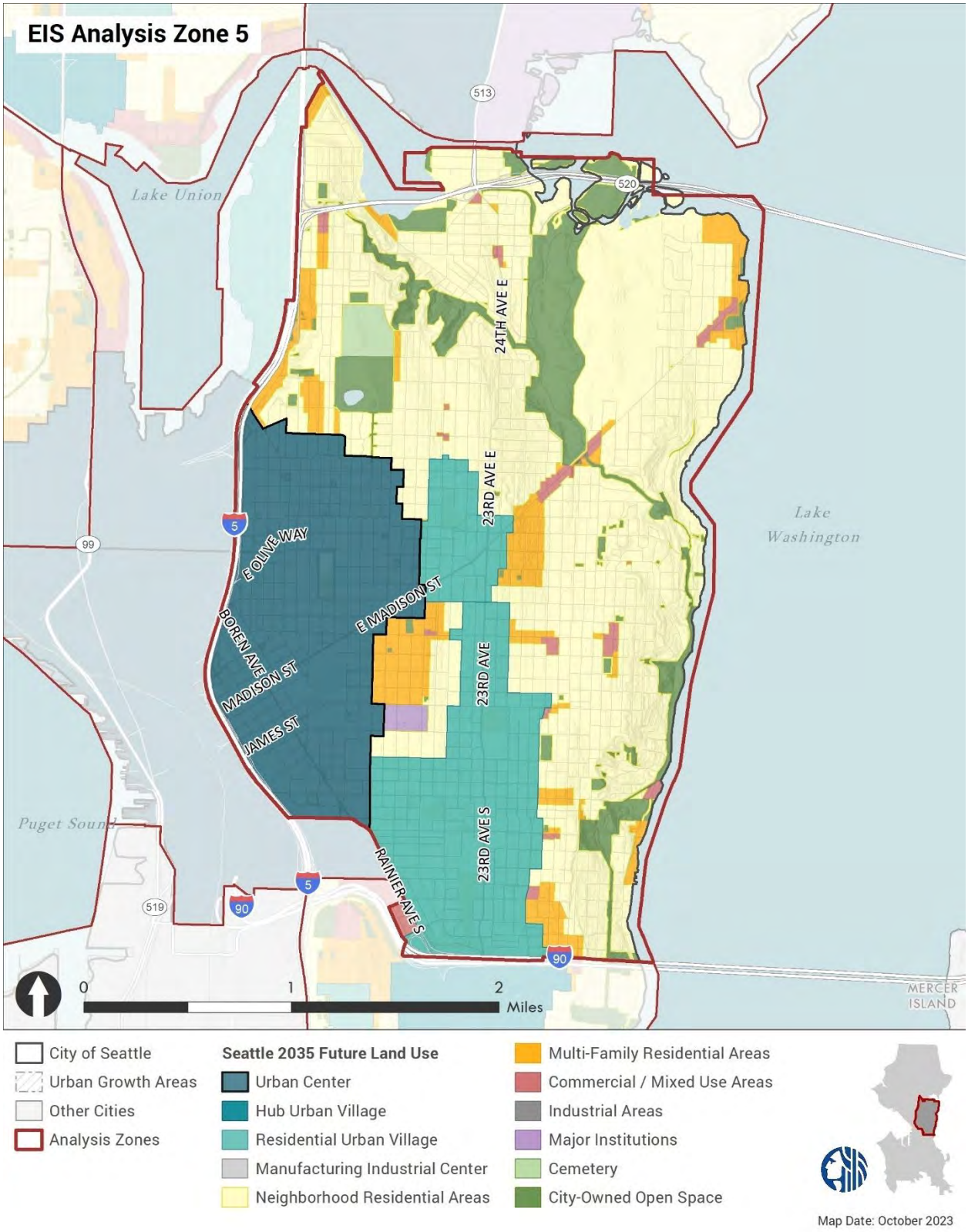
Future Land Use, Zoning, & Shorelines

Area 5 includes the portion of Seattle east of Interstate 5, north of Interstate 90, and south of the Montlake Cut. The analysis area is also bounded by its shoreline fronting Portage Bay and Lake Washington. It includes approximately 3,332 acres of buildable lands or 8% of the buildable lands city wide including the First Hill/Capitol Hill Urban Center and the 23rd & Union-Jackson and Madison-Miller Residential Urban Villages.

The urban center and urban village designations indicate where growth is to be concentrated in the future land use map including the First Hill/Capitol Hill Urban Center and the 23rd & Union-Jackson and Madison-Miller residential urban. Outside of the center and village boundaries, future multi-family residential and commercial/mixed-use areas are also planned along these streets. Seattle University accounts for a small pocket of major institution designation between the First Hill/Capitol Hill Urban Center and the 23rd and Union-Jackson Residential Urban Village. Neighborhood Residential future land use designations fill in the other intervening areas. Future land use and zoning acreage within the analysis area are detailed in **Exhibit 3.6-14** and **Exhibit 3.6-16** and mapped in **Exhibit 3.6-48** and **Exhibit 3.6-49**.

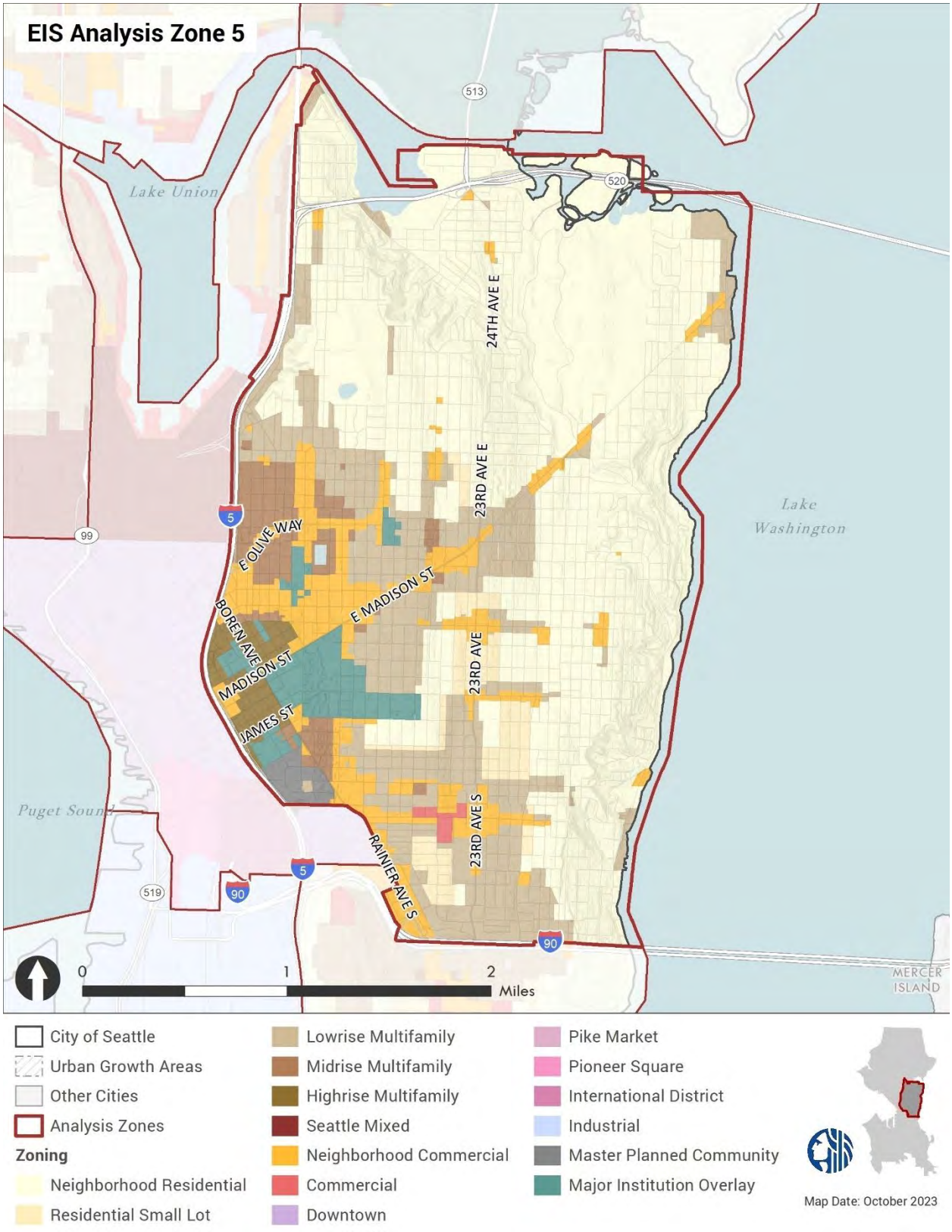
Area 5 includes about 7% of the city's designated shoreline district (513 acres). Nearly three-quarters of this area is within a conservancy shoreline environment, including Conservancy Management (12%) within the inner harbor of Portage Bay, Conservancy Preservation (31%) where Foster Island meets Union Bay, and Conservancy Recreation (32%) along the eastern frontage of the study area along Lake Washington. Another 24% is designated Urban Residential, predominantly along the shoreline of Lake Washington. Designated shoreline acreage within the analysis area is detailed in **Exhibit 3.6-18** and mapped in **Exhibit 3.6-50**.

Exhibit 3.6-48. Area 5: Capitol Hill/Central District—Future Land Use Designations



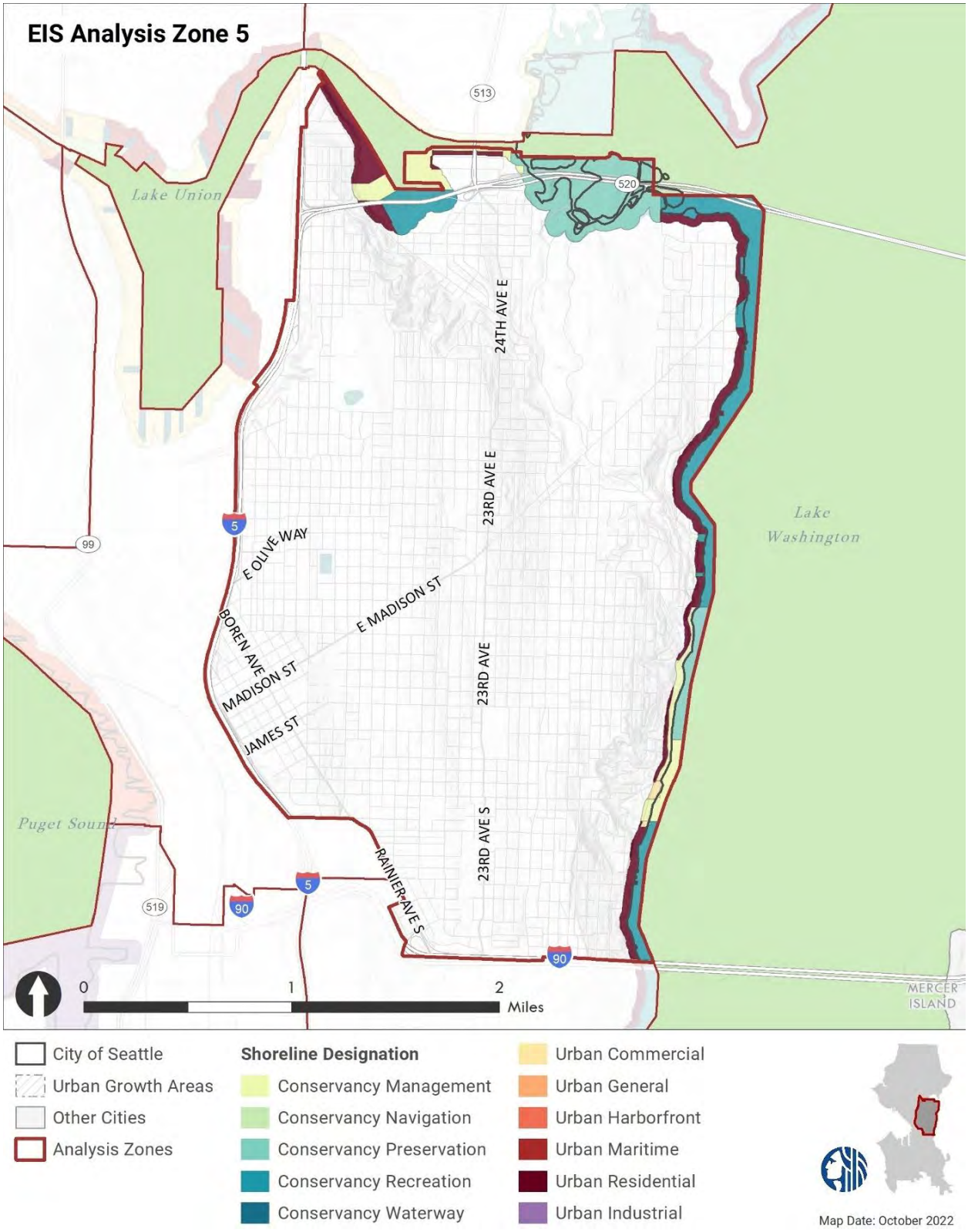
Source: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-49. Area 5: Capitol Hill/Central District—Zoning



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

Exhibit 3.6-50. Area 5: Capitol Hill/Central District—Shoreline Designations



Source: City of Seattle, 2022; BERK, 2022.

Existing Land Use

Existing Uses

The largest existing land use category is single family residential which accounts for 46% of existing uses versus 48% citywide. Commercial/mixed-use areas are centered in the First Hill/Capitol Hill Urban Center and the 23rd & Union-Jackson and Madison-Miller residential urban villages. Approximately 18% of the analysis area is currently multi-family residential which is slightly more than double the proportion citywide (9%).

Major institutions, public facilities, and utilities account for 7% of the existing land uses in the analysis area. These uses include Seattle University, Seattle Central College, Garfield Highschool, Bailey Gatzert Elementary, Thurgood Marshall Elementary, and the King County Juvenile Detention Center. Parks, open space, and cemeteries account for 18% of the land uses in the analysis area compared to 14% citywide. The largest uses in this category include the Washington Park Arboretum, Volunteer Park, Cal Anderson Park, Frink Park, and Powell Barnett Park.

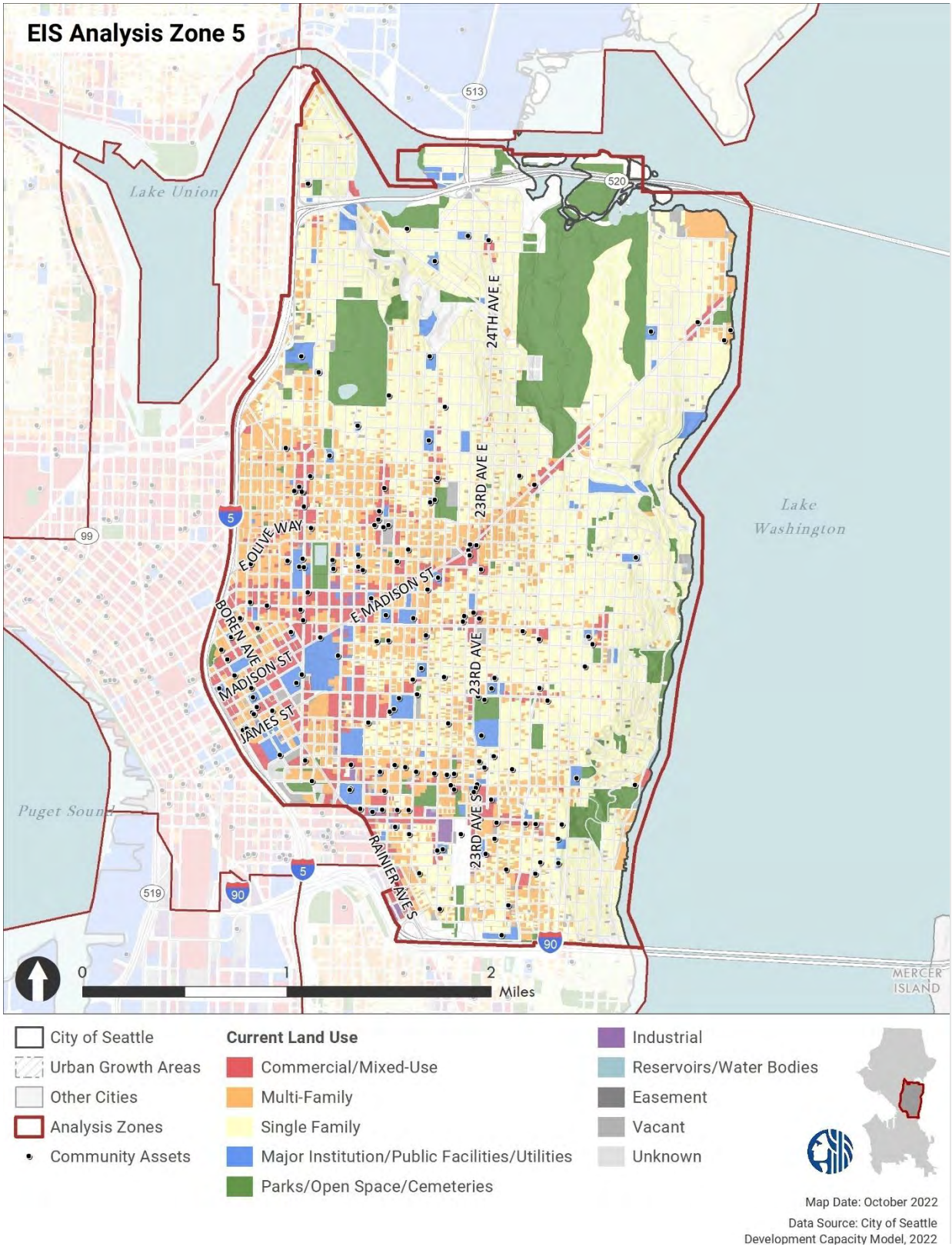
Current land use acreage is detailed in **Exhibit 3.6-19** and mapped in **Exhibit 3.6-51**.

General Urban Form

Area 5 was developed early in Seattle's post-colonial history as the city grew outward from the settlement on Elliott Bay. The well-connected street grid is complemented by organic growth patterns with larger, more intense buildings near downtown scaling gradually down to smaller buildings toward the lake, a pattern which was later locked in place through zoning.

In the twentieth century, the southern portion of the area, generally south of E Madison St and east of 12th Ave, known as the Central Area or Central District was redlined by banks and government institutions, making it nearly impossible for Black residents to live elsewhere in the city (see the **Racially Restrictive Covenants & Zoning Laws** discussion above). This racist practice resulted in high population density with severely limited investment in infrastructure and building stock. Community-supported investments in and construction of vernacular housing, churches, stores, and institutions such as banks still play an important role in the built form of the district, though many have been redeveloped in recent decades. During the late 1980s, construction of the long planned I-90 connection across Lake Washington and through the Central District resulted in the demolition of several blocks of homes and businesses in the Atlantic neighborhood, the southern part of Area 5. This project, long stalled by community advocates who successfully sued under environmental protection laws, ultimately led to the construction of a freeway lid with 15 acres of parkland. Highway construction created a significant gap in the built fabric between the Central District and Rainier Valley and Mount Baker neighborhoods to the south. See **Exhibit 3.6-52** and the **Annexation & Regional Transportation Corridors** discussion above.

Exhibit 3.6-51. Area 5: Capitol Hill/Central District—Current Land Use



Source: City of Seattle, 2022; BERK, 2022.

Exhibit 3.6-52. Left: High-Density Vernacular Housing in the Central District Circa 1951. Right: I-90 Immediately After Construction in 1991

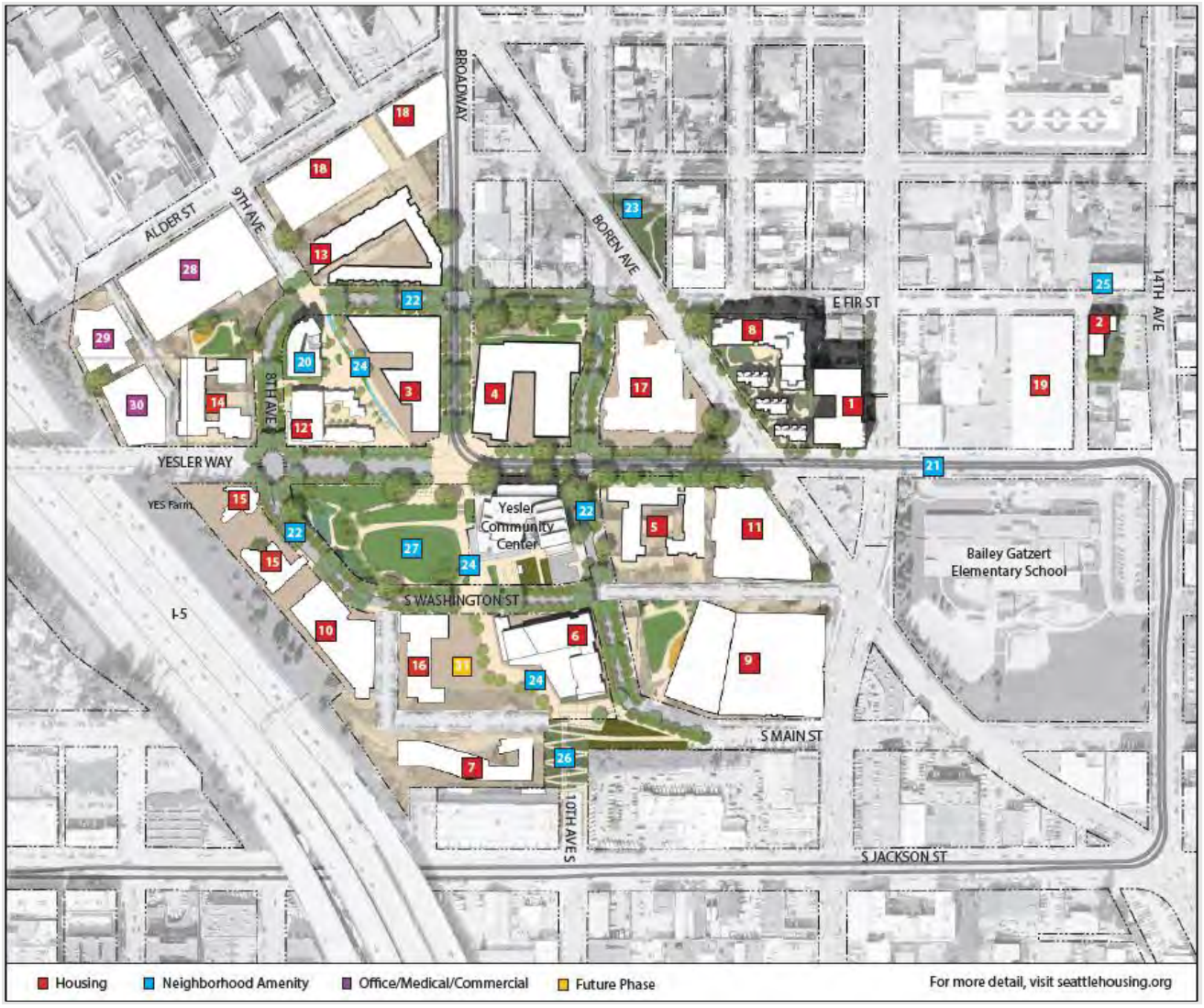


Sources: Left: University of Washington Manuscript Division. Right: Nakano Associates.

At the heart of the Central District, a few blocks around 23rd and Union have redeveloped with greater intensity mixed-use development over the last 5 years. An OPCD-led planning effort to establish community-created Central Area Design Guidelines, as well as a Community Roots Housing-led (then Capitol Hill Housing) design process for the Liberty Bank (the first Black-owned bank in the Pacific Northwest) redevelopment, has led to place-based architecture and public art that feels connected to the neighborhood's historical roots as a Black cultural hub.

In 2013, Seattle Housing Authority began redeveloping its 30-acre Yesler Terrace public housing site in the southwestern corner of Area 5. When completed, the new development will have around 5,000 mixed-income units (including a one-for-one replacement of the former subsidized units) as well as a community center, commercial space, parks, and parking. Its design includes view corridors to Mt Rainier and downtown, a trail, transit access, hillclimb to Chinatown-International District, and public art. See **Exhibit 3.6-53**.

Exhibit 3.6-53. Yesler Terrace Redevelopment



Source: Seattle Housing Authority, 2022.

Heights

The tallest buildings in Area 5 are in First Hill, where there are several high-rises. Capitol Hill, Yesler Terrace, and the Central District along 23rd Avenue have many buildings in the 4- to 7-story range. There are 3-story townhouses scattered around the Central District and Judkins Park. However, most of the rest of the area is zoned neighborhood residential and has building heights of 1 to 2 floors.

Transitions

The border between the greater Downtown and First Hill/Capitol Hill urban centers and less intense neighborhoods to the east and northeast is a major transition from greater to lesser intensity.

Area 6: West Seattle

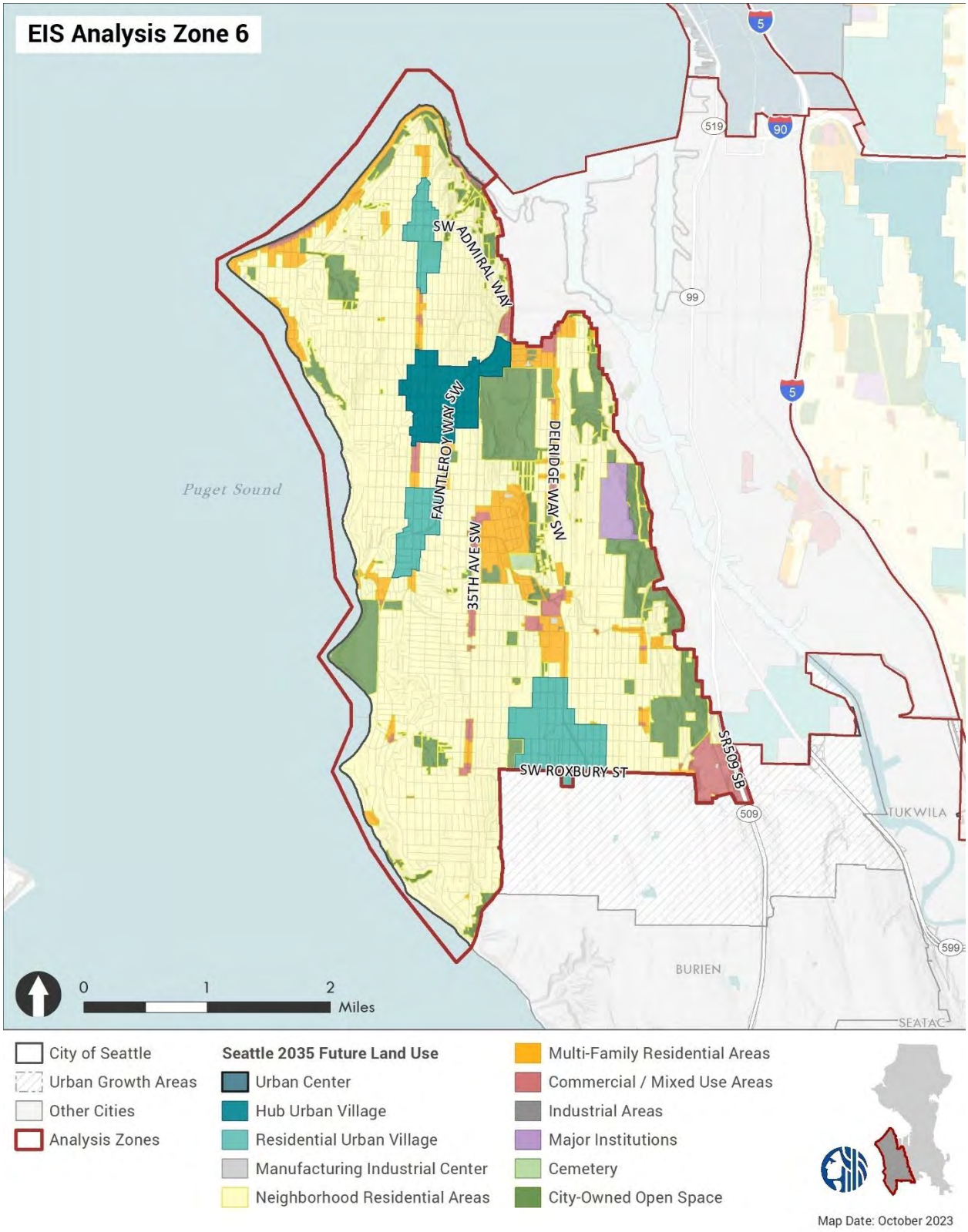
Future Land Use, Zoning, & Shorelines

Area 6 includes the portion of Seattle west of the Duwamish Waterway and State Route 509, north of SW Roxbury St, and is bounded by the Puget Sound at its western and northern extents. It includes approximately 6,411 acres of buildable land, or 16% of the buildable lands city wide. Additionally, Area 6 includes the West Seattle Junction Hub Urban Village as well as the Westwood-Highland Park, Morgan Junction, and Admiral residential urban villages.

About 8% of the analysis area is designated as an urban village. Outside of the urban villages, commercial/mixed-use and multi-family designations generally follow California Ave SW, Alki Ave SW, Delridge Way SW, and Fauntleroy Way SW. Neighborhood residential designations fill in the intervening areas accounting for 63% of future land use designations in the analysis area. Future land use and zoning acreage within the analysis area are detailed in **Exhibit 3.6-14** and **Exhibit 3.6-16** and mapped in **Exhibit 3.6-54** and **Exhibit 3.6-55**.

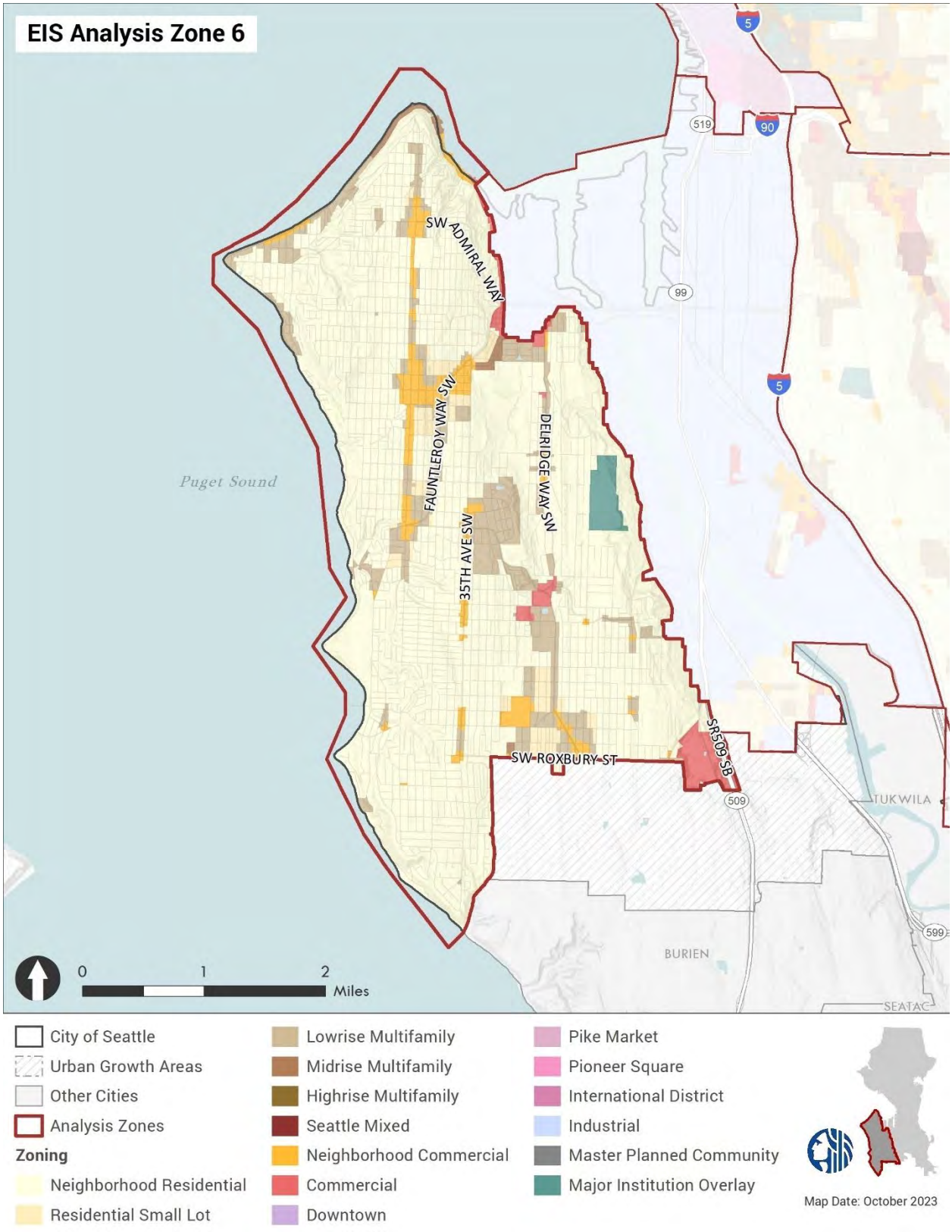
Area 6 includes about 15% of the city's designated shoreline district (1,102 acres). Nearly 85% of this area is within a conservancy shoreline environment, including Conservancy Management (4%) on the northeastern shoreline fronting Elliott Bay, Conservancy Preservation (31%) on the northern edge of Alki Beach and surrounding Lincoln Park, and Conservancy Recreation (50%) on a majority of the eastern shoreline fronting the Puget Sound. Another 15% is designated as Urban Residential infilling between the public lands of Lincoln Park and Alki Beach. Designated shoreline acreage within the analysis area is detailed in **Exhibit 3.6-18** and mapped in **Exhibit 3.6-56**.

Exhibit 3.6-54. Area 6: West Seattle—Future Land Use Designations



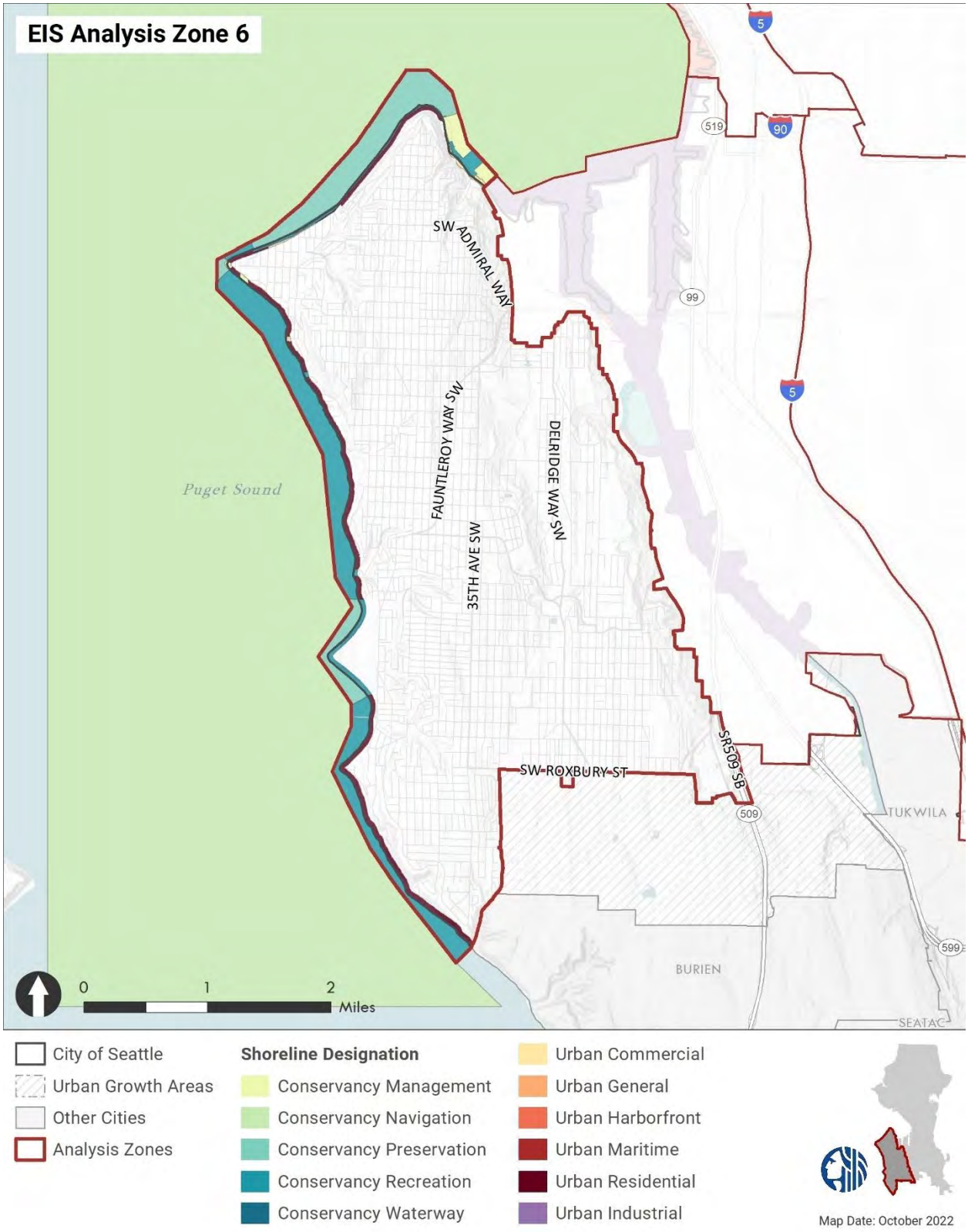
Source: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-55. Area 6: West Seattle—Zoning



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

Exhibit 3.6-56. Area 6: West Seattle—Shoreline Designations



Source: City of Seattle, 2022; BERK, 2022.

Existing Land Use & Urban Form

Existing Uses

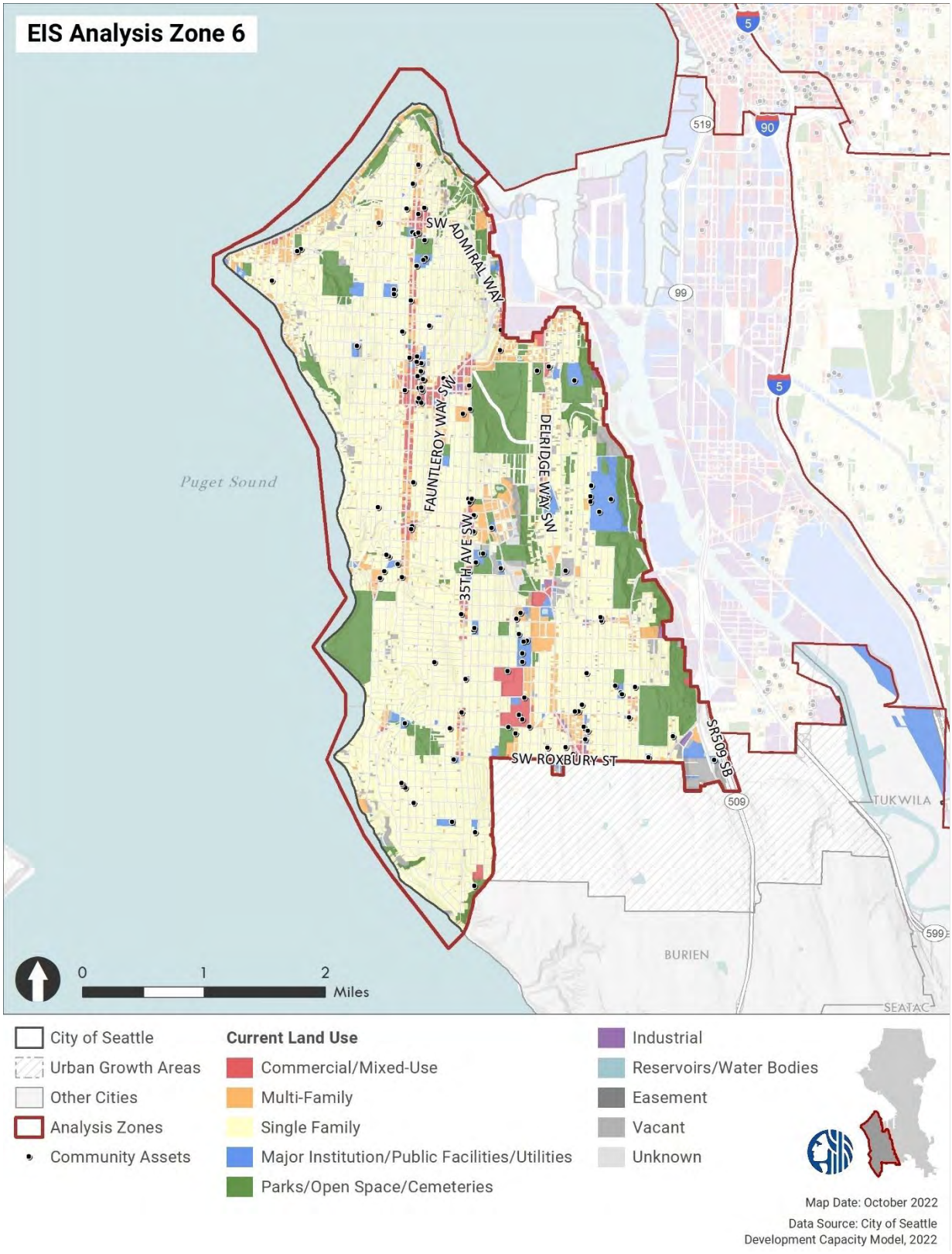
The largest existing land use category is single family residential, which accounts for 59% of the land (versus 48% citywide). Existing commercial/mixed-use and multi-family uses, as well as a majority of the community assets, are located within the existing urban village boundaries oriented along California Ave SW. Commercial/mixed-use land uses found within the urban village boundaries are typically medium-density apartment buildings with ground floor commercial around a main commercial corridor that supports essential neighborhood amenities. California Ave SW still maintains a majority of its historic urban fabric supporting single-story retail uses whereas the Westwood-Highland Park Residential Urban Village is comprised of newer, master-planned big box development. Outside of the urban village boundaries, multi-family development is concentrated around the Alki Beach, Highpoint neighborhoods, and along California Ave SW.

Major institutions and public facilities account for 5% of the existing land uses versus 11% citywide. The largest uses in this category are educational institutions including South Seattle College, Pathfinder K-8 School, Denny International Middle School, Madison Middle School, and West Seattle Highschool. Parks, open space, and cemeteries account for an additional 18% consisting primarily of West Duwamish Greenbelt, West Seattle Golf Course, and Lincoln, Schmitz Preserve, and Fauntleroy Parks.

The share of industrial land uses in the analysis area is lower than the city overall (0.3% versus 5%) and consist primarily of a public storage facility on the southern border of Seattle.

Current land use acreage is detailed in **Exhibit 3.6-19** and mapped in **Exhibit 3.6-57**.

Exhibit 3.6-57. Area 6: West Seattle—Current Land Use



Source: City of Seattle, 2022; BERK, 2022.

General Urban Form

Most of Area 6 was developed in the first half of the twentieth century following streetcar suburb development patterns, featuring commercial and mixed-use main streets surrounded by rectangular lower-density residential blocks. By contrast, in the east part of the area, industrial uses expanded up the Delridge valley from the Duwamish area, notably including the Youngstown steel plant, which attracted workers who settled in the valley. The legacy of mixed industrial commercial and residential uses, relatively dense working-class dwellings, and racial diversity continues to shape the neighborhood's built form.

Heights

The tallest buildings in Area 6 are found in the northern part of the analysis area. Buildings in the West Seattle Junction Hub Urban Village are generally 5- to 7-stories, while buildings in the Admiral and Morgan Junction residential urban villages and along the strip on Alki Beach are 3- to 5-stories. The rest of the analysis area consists mainly of 1- and 2-story buildings.

Transitions

The central location of part of the West Seattle Junction Hub Urban Village at the top of the hill accentuates building height and creates a potential risk for stark transitions in building scale to adjacent low-density residential areas.

Shadows

The West Seattle Junction Urban Village's northeastern portion is in a small valley. Tall, wide buildings combined with slopes to the south and west create abundant shade during winter months.

Area 7: Duwamish

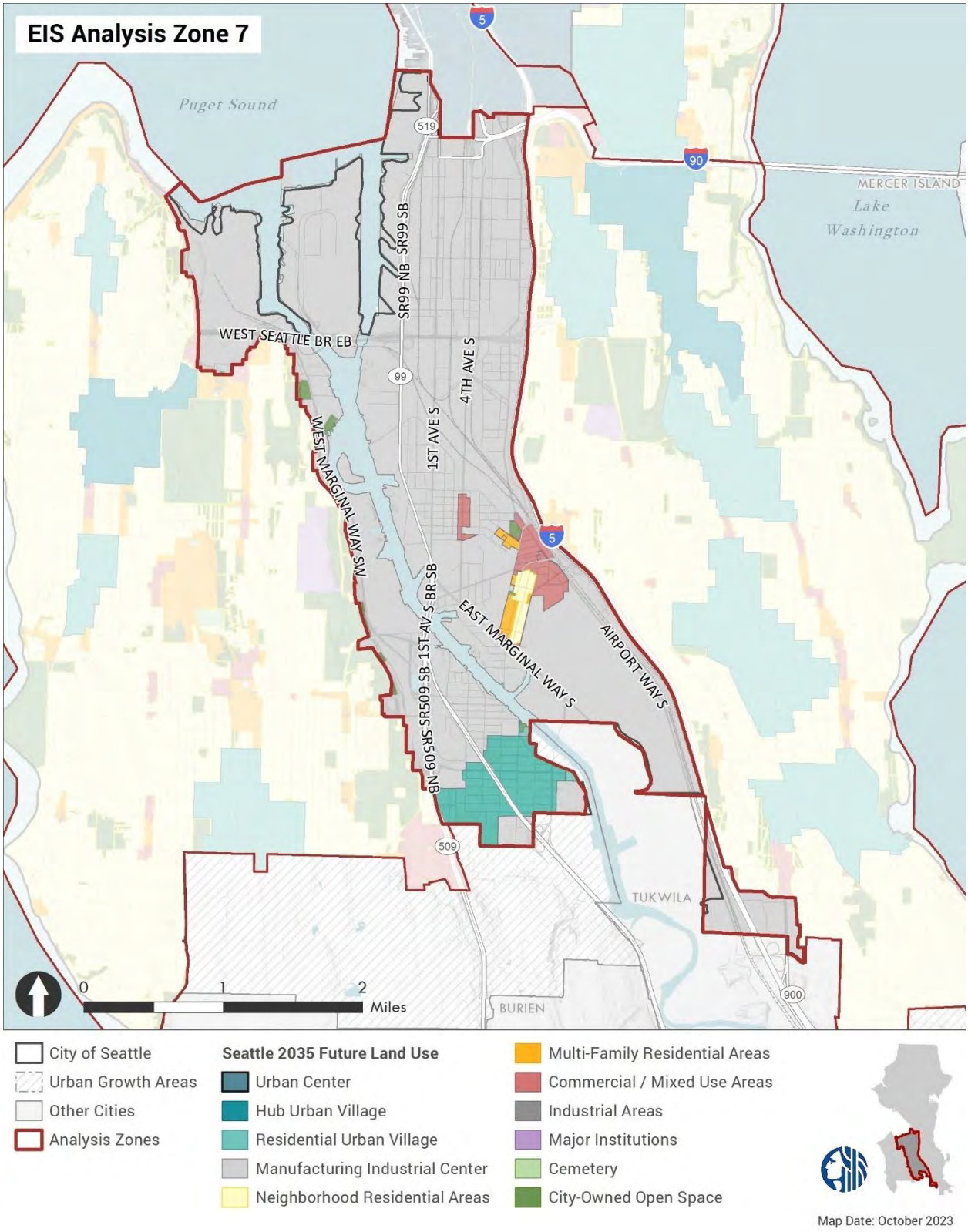
Future Land Use, Zoning, & Shorelines

Area 7 includes a portion of Seattle bordering the Duwamish Waterway west of Interstate 5, east of W Marginal Way SW, sharing its northern boundary with the Elliott Bay. It includes approximately 4,056 acres of buildable land, or 10% of buildable lands citywide. Additionally, Area 7 includes the South Park Residential Urban Village and the Greater Duwamish MIC.

Nearly 92% of Area 7 is designated as a manufacturing industrial center on the future land use map. The remainder is allocated towards the South Park Urban Village at the southeastern corner of the analysis area, and the residential/commercial mix around the Van Asselt neighborhood in Georgetown. Future land use and zoning acreage within the analysis area are detailed in **Exhibit 3.6-14** and **Exhibit 3.6-16** and mapped **Exhibit 3.6-58** and **Exhibit 3.6-59**.

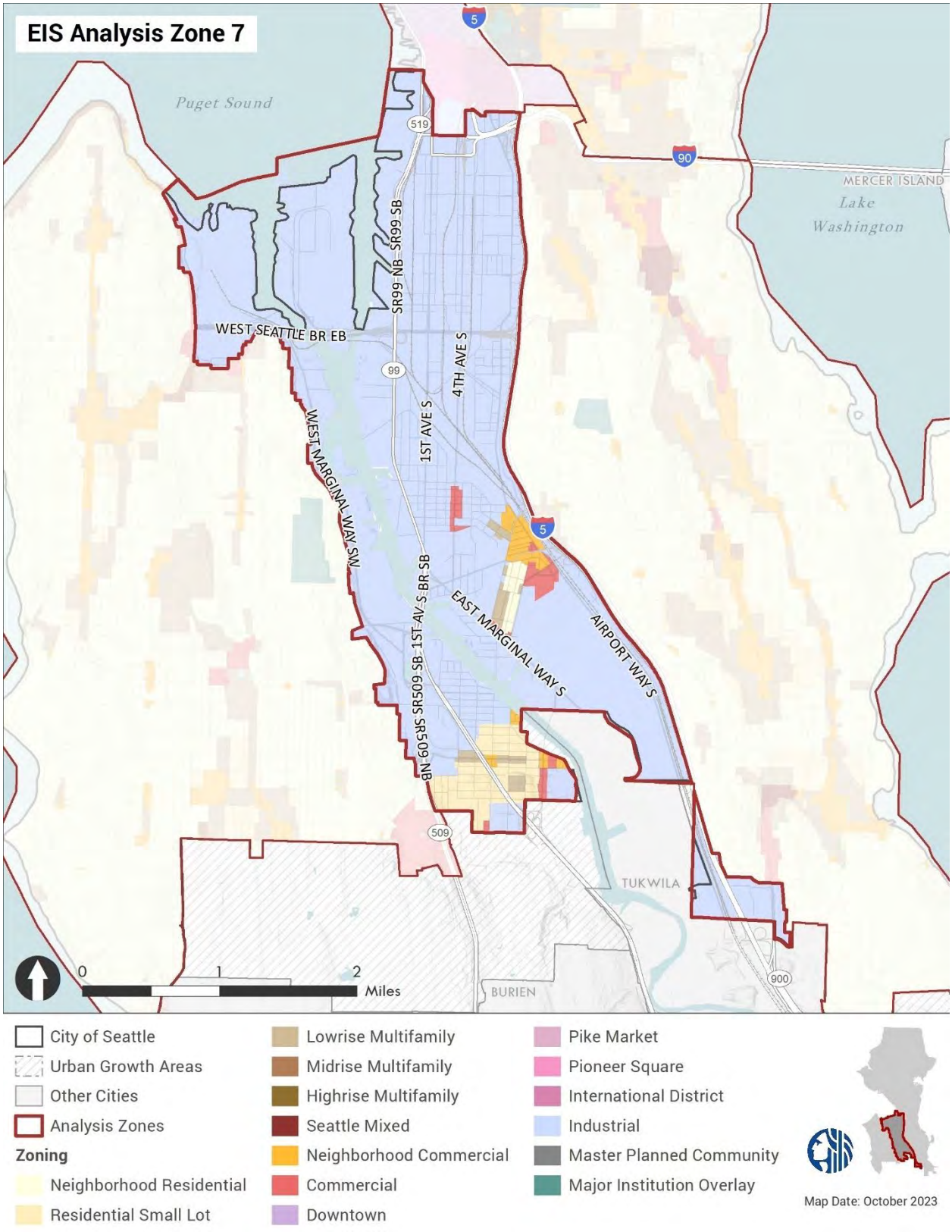
Area 7 includes about 16% of the city's designated shoreline district (1,185 acres). Nearly 95% of this area is within the Urban Industrial designation surrounding Harbor Island and spanning both side of the shoreline along the Duwamish Waterway. The reminder is within the Conservancy Preservation designation on the western shoreline adjacent to Kellogg Island. Designated shoreline acreage within the analysis area is detailed in **Exhibit 3.6-18** and mapped in **Exhibit 3.6-60**.

Exhibit 3.6-58. Area 7: Duwamish—Future Land Use Designations



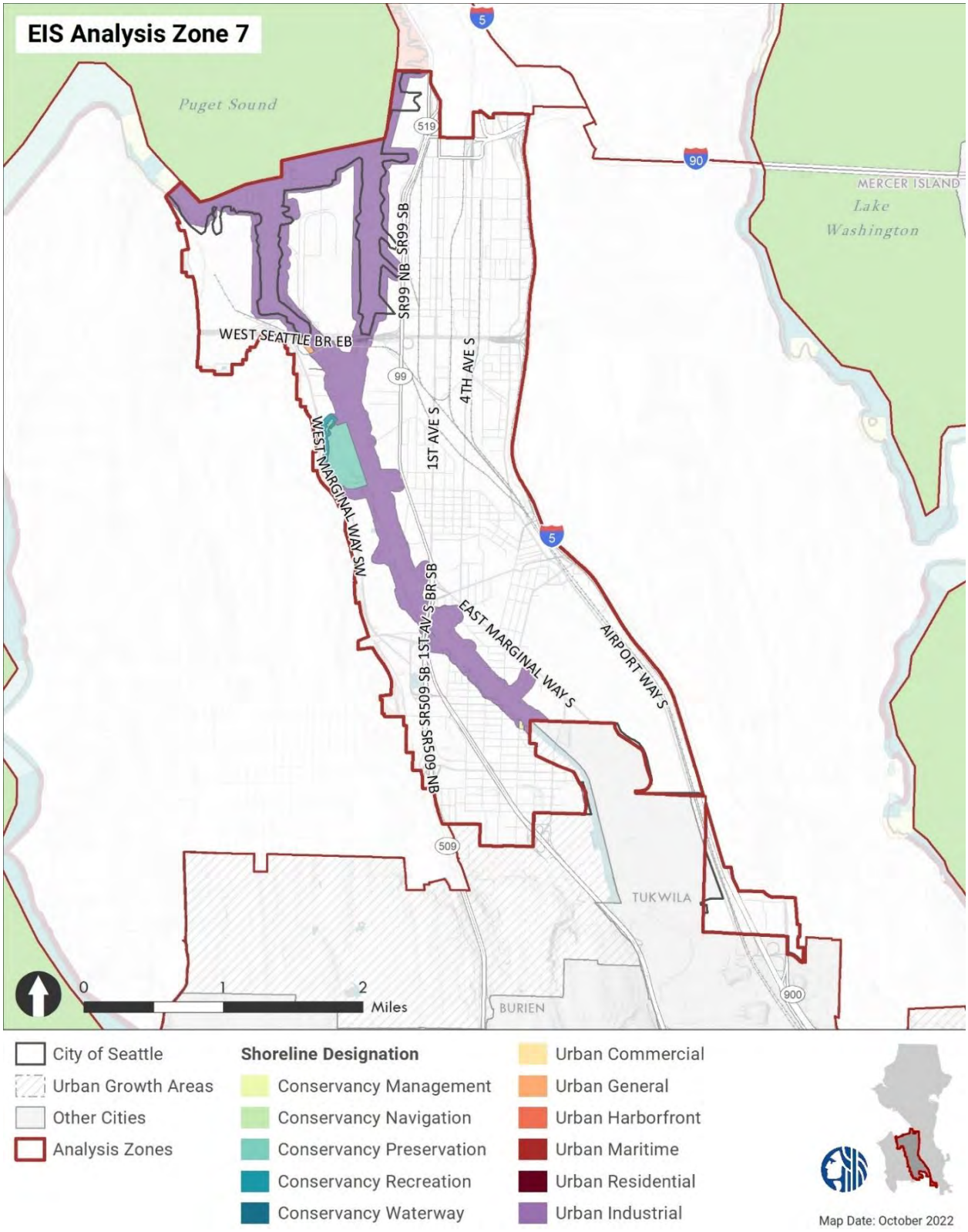
Source: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-59. Area 7: Duwamish—Zoning



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

Exhibit 3.6-60. Area 7: Duwamish—Shoreline Designations



Source: City of Seattle, 2022; BERK, 2022.

Existing Land Use & Urban Form

Existing Uses

The largest existing land use category within Area 7 is industrial, which accounts for 37% of the land (versus 5% citywide). The analysis area contains the entirety of the Greater Duwamish Manufacturing Industrial Center and supports the Port of Seattle's primary marine shipping area. Vacant land accounts for nearly 14% of the land use as compared to 5% citywide. This is largely because of unbuildable land adjacent to railway corridors running throughout the analysis area and parcels paved for staging and storage uses including the First Study Bus Yard.

Existing commercial/mixed-use land uses account for 7% of existing land uses in the analysis area. These are located throughout the analysis area as a result of specific commercial uses currently allowed in industrial zoned areas of the city. Commercial/mixed use land uses found in the South Park Residential Urban Village follow a more traditional pattern—these are spatially organized along 14th Ave S and support at-grade commercial uses. In comparison, commercial/mixed use land use located throughout the MIC are not organized by any spatial logic and support a variety of more intense and less pedestrian friendly uses such as auto dealerships and wholesale retailers.

Major institutions and public facilities account for an additional 35% of existing uses consisting primarily of Port of Seattle, King County International Airport, and Sound Transit properties. Parks, open space, and cemeteries account for only 1% of existing land uses, primarily attributed to the Georgetown and South Park Playfields as well as Marra-Desimone Park. This is the lowest allocation of parks, open space, and cemetery uses across the eight analysis areas.

Single family and multi-family uses account for 5% of the existing land use, centered exclusively within the South Park Residential Urban Village and the Van Asselt neighborhood.

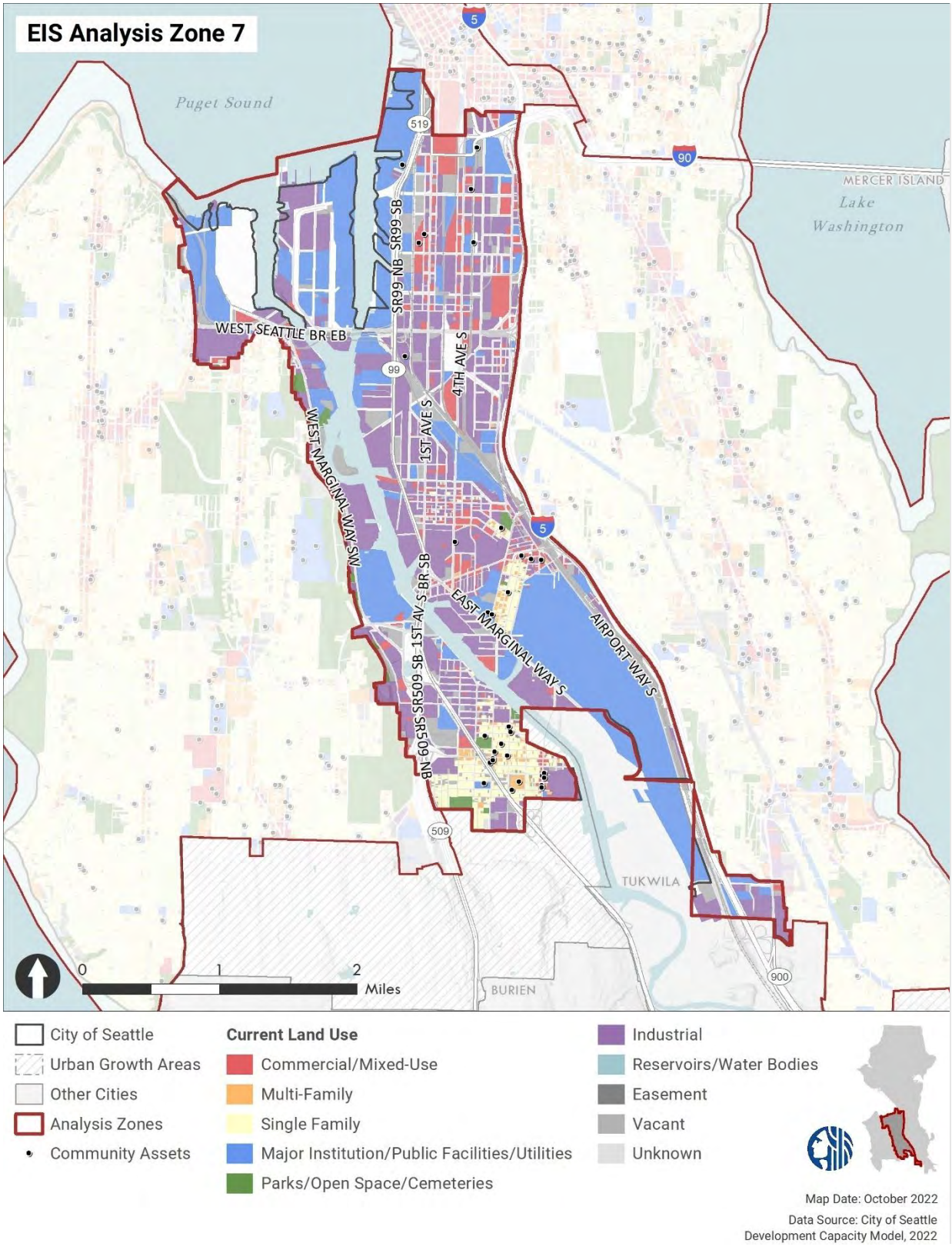
Current land use acreage is detailed in **Exhibit 3.6-19** and mapped in **Exhibit 3.6-61**.

General Urban Form

Area 7 is almost entirely composed of land that was formerly part of the Duwamish River floodplain and tidal flats. This was a rich, constantly shifting landscape with abundant plant and animal life that was essential to the lifeways of the Duwamish people, who lived in villages near the water.

During the first century of Seattle settlement, American settlers gradually straightened, dredged, hardened, and diverted the river and filled in tide flats to create developable land near the harbor (see the **Overview of Historical Planning & Land Use Decisions** discussion above). Changes to the river initially unlocked agriculture in the rich alluvial soils of the valley surrounding the small agricultural/industrial towns of Georgetown and South Park. Industrial growth spread southwards from Seattle, converting the large open parcels of farmland to industrial uses, and leaving these two neighborhoods isolated in a largely industrial landscape with near total hardscape coverage and large, freight-oriented roadways.

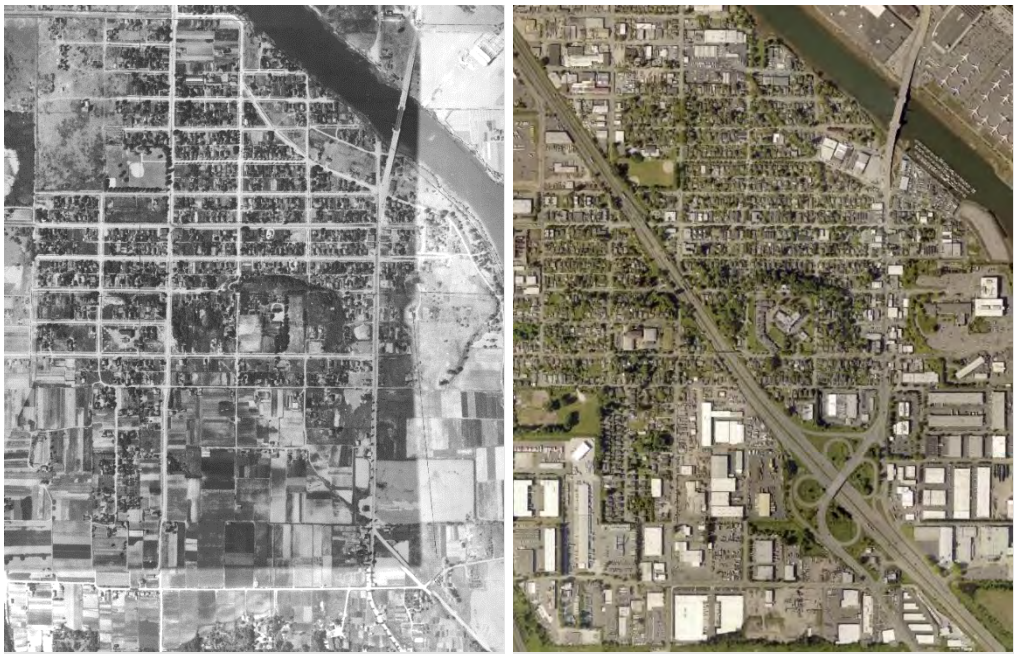
Exhibit 3.6-61. Area 7: Duwamish—Current Land Use



Source: City of Seattle, 2022; BERK, 2022.

Development of Highway 99 and I-5 through the neighborhoods resulted in demolition of existing homes and businesses and created physical and sensory barriers within the neighborhoods. In 2023, the community group Reconnect South Park was awarded $1.6 million to study removing part of Highway 99 to reconnect the neighborhood. See **Exhibit 3.6-62** and the **Annexation & Regional Transportation Corridors** discussion above.

Exhibit 3.6-62. Left: Aerial View of South Park in 1936. Right: Aerial View of South Park in 2021



Sources: Left: King County Public Works; Right: Eagleview Technologies © 2022

Heights

Area 7 consists mainly of 1- and 2-story buildings although zoning currently allows taller buildings.

Transitions

In general, potential transition impacts in Area 7 are limited due to nearly uniform industrial zoning and geographic barriers like I-5 and the Duwamish Waterway. Two exceptions to this are the South Park and Georgetown neighborhoods, which are surrounded by industrial zoning and currently exhibit a stark contrast in lot and building size between residential and industrial areas. Elements like street trees, sidewalks, and small public parks help to soften these transitions. Steep forested slopes and major roadways to the east and west of Area 7 generally provide ample buffers between industrial areas and residential areas in Beacon Hill and West Seattle. However, industrial uses intrude into north Delridge in an area where median household income is lower than the citywide median.[26]

[26] Median household income in Census tract 99 (which includes North Delridge) was $86,663 versus the citywide median of $105,391 in 2021. Source: American Community Survey 5-Year Estimates (2017-2021): S1901 Income in the past 12 months (in 2021 inflation-adjusted dollars).

Area 8: SE Seattle

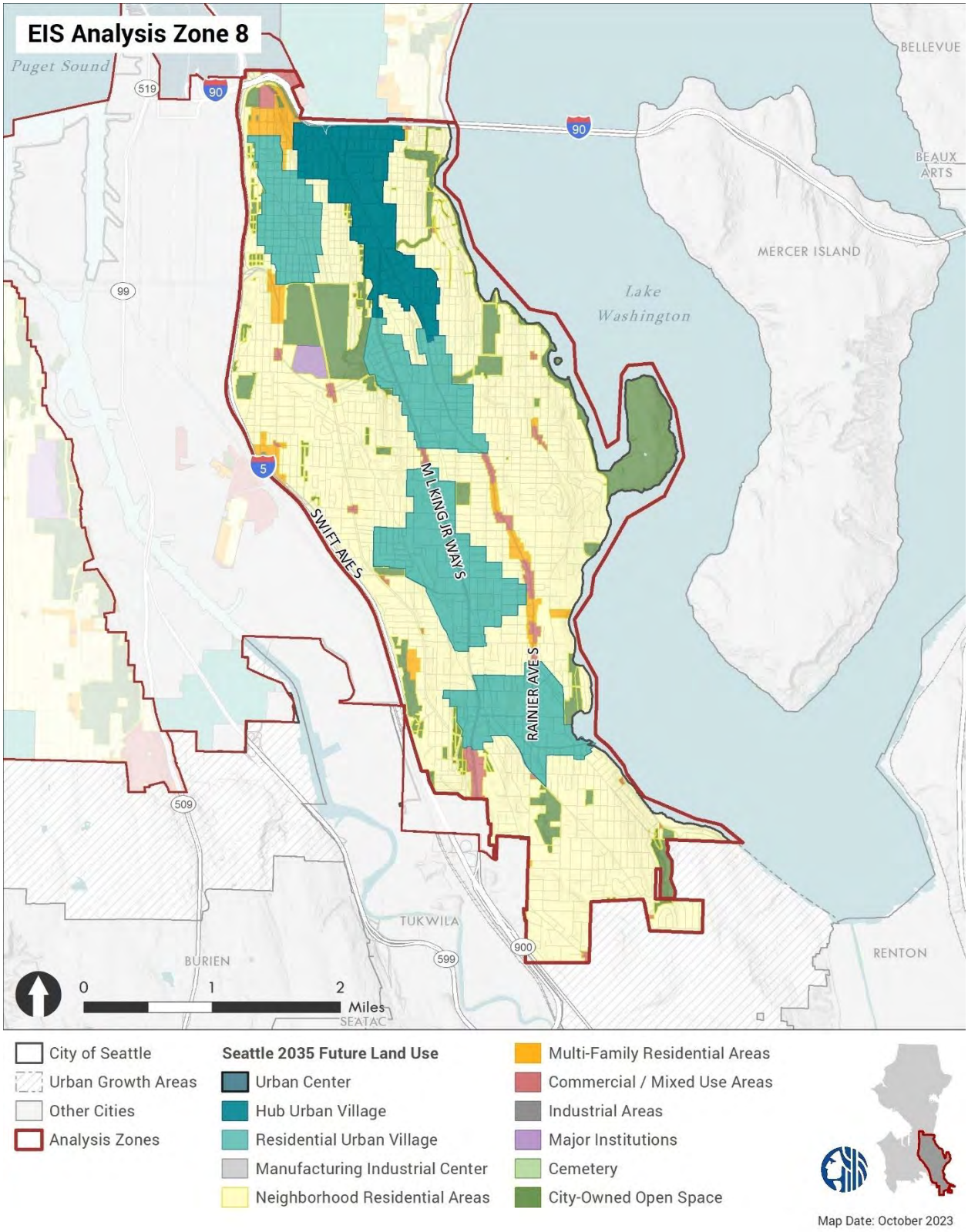
Future Land Use, Zoning, & Shorelines

Area 8 includes the portion of Seattle east of Interstate 5, south of Interstate 90, and shares its eastern frontage with Lake Washington. It includes approximately 5,656 acres of buildable land, or 14% of the buildable land citywide. Additionally, the analysis area includes the Mt Baker Hub Urban Village and the North Beacon Hill, Columbia City, Othello, and Rainier Beach Residential Urban Villages. Nearly 23% of Area 8 is designated as either a residential or hub urban village.

Outside of these urban village boundaries, a majority of the commercial/mixed-use and multi-family future land use and zoning designations are concentrated adjacent to major arterials running between urban village boundaries. Outside of the urban villages, commercial/mixed-use and multi-family designations generally follow Beacon Ave S, Rainier Ave S, and MLK Jr Way S. Neighborhood residential designations fill in the intervening areas. Future land use and zoning acreage within the analysis area are detailed in **Exhibit 3.6-14** and **Exhibit 3.6-16** and mapped in **Exhibit 3.6-63** and **Exhibit 3.6-64**.

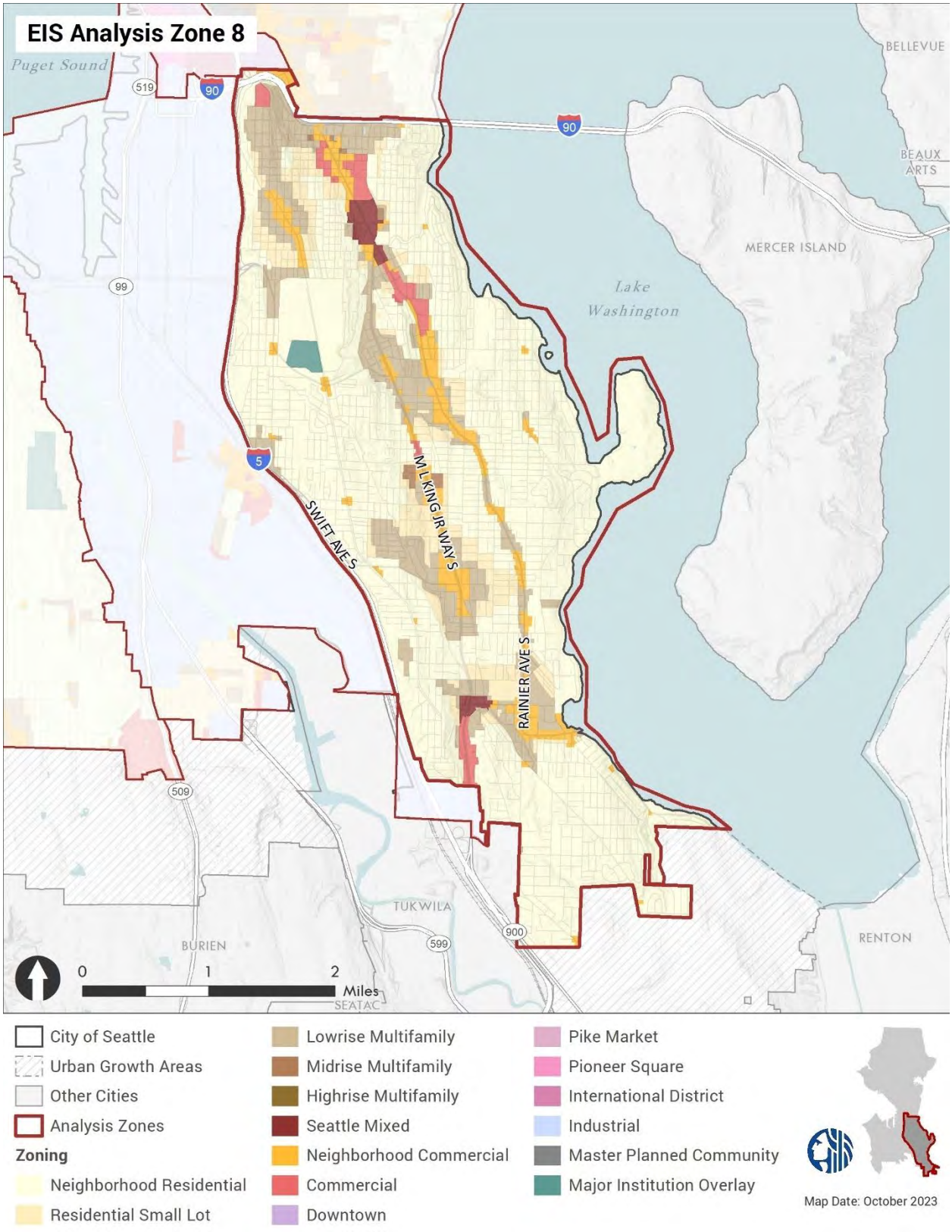
Area 8 includes about 9% of the city's designated shoreline district (678 acres). Nearly 85% of this area is within a conservancy shoreline environment including Conservancy Management (8%) around the Stan Sayres Boat Launch, Lakewood Marina, and Parkshore Arena, Conservancy Preservation (17%) surrounding Seward Park, and Conservancy Recreation (59%) spanning the remainder of the shoreline. Another 14% is designated as Urban Residential covering the lakefront properties south of I-90 and north of Coleman Beach, and lakefront properties between Seward Park and the southern extent of the City of Seattle. Designated shoreline acreage within the analysis area is detailed in **Exhibit 3.6-18** and mapped in **Exhibit 3.6-65**.

Exhibit 3.6-63. Area 8: SE Seattle—Future Land Use Designations



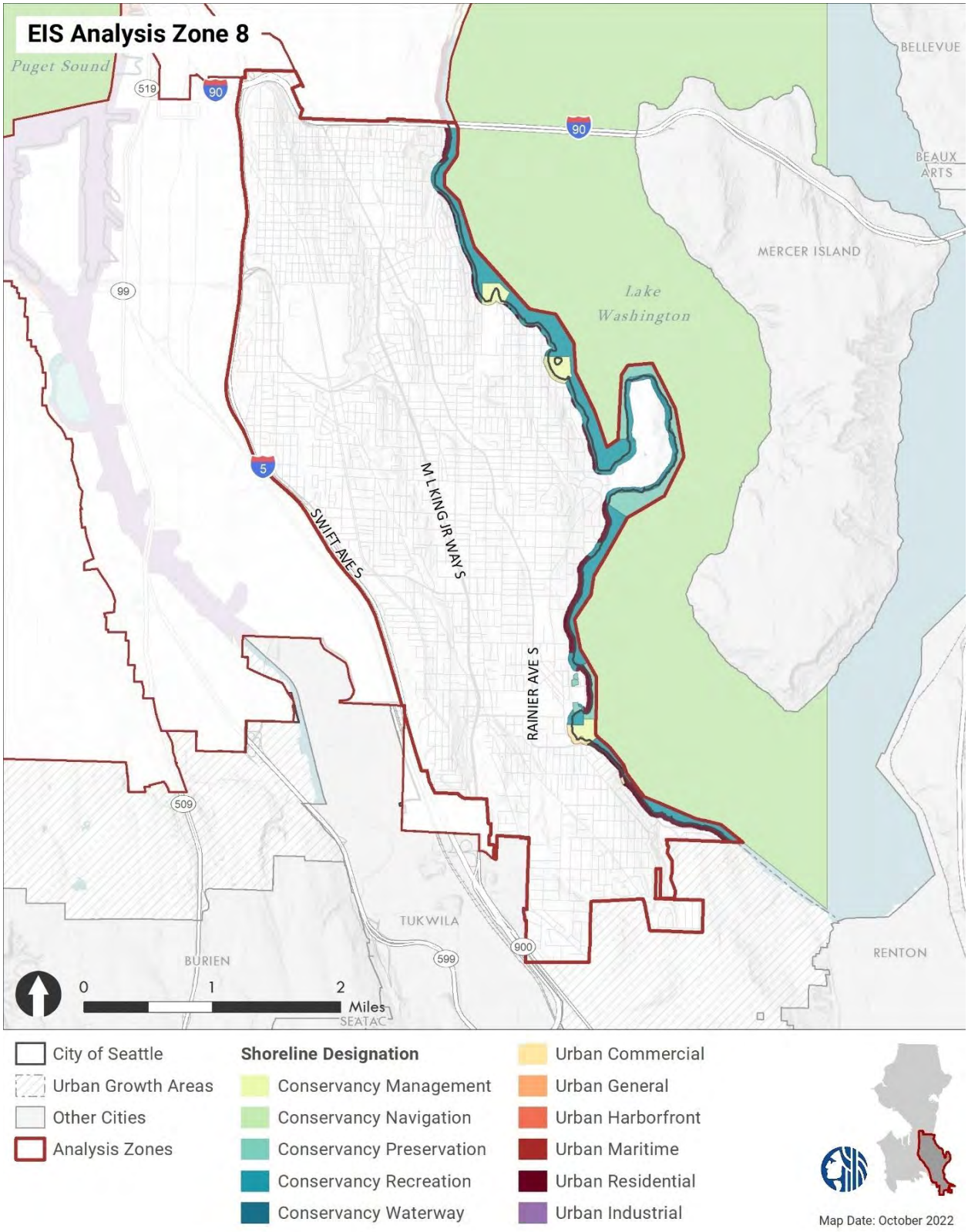
Source: City of Seattle, 2022; BERK, 2023.

Exhibit 3.6-64. Area 8: SE Seattle—Zoning



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

Exhibit 3.6-65. Area 8: SE Seattle—Shoreline Designations



Source: City of Seattle, 2022; BERK, 2022.

Existing Land Use & Urban Form

Existing Uses

The largest existing land use category is single family residential, which accounts for 57% of the land (versus 48% citywide). Existing commercial/mixed-use and multi-family uses, as well as a majority of the community assets, are located within the existing urban village boundaries.

Major institutions and public facilities account for 6% of the existing land uses consisting primarily of the Veterans Administration Campus and Hospital, the high voltage power easement running NW to SE diagonally through the analysis area, and public schools including Emerson Elementary, Kimball Elementary, Mercer Middle School, Rainier Beach Highschool, Cleveland Highschool, and Franklin Highschool. Parks, open space, and cemeteries account for an additional 17% of current land uses and consist of mostly large urban parks including Seward Park, Jefferson Park and the Jefferson Park Golf Course, the Cheasty Natural Area, and Kubota Garden.

Vacant land accounts for a higher share of current use in the analysis area versus vacant use citywide (7% versus 5%). This is largely because of the high voltage power easement running through the analysis area as well as unused lands adjacent to the Sound Transit Light Rail line.

Current land use acreage is detailed in **Exhibit 3.6-19** and mapped **Exhibit 3.6-66**.

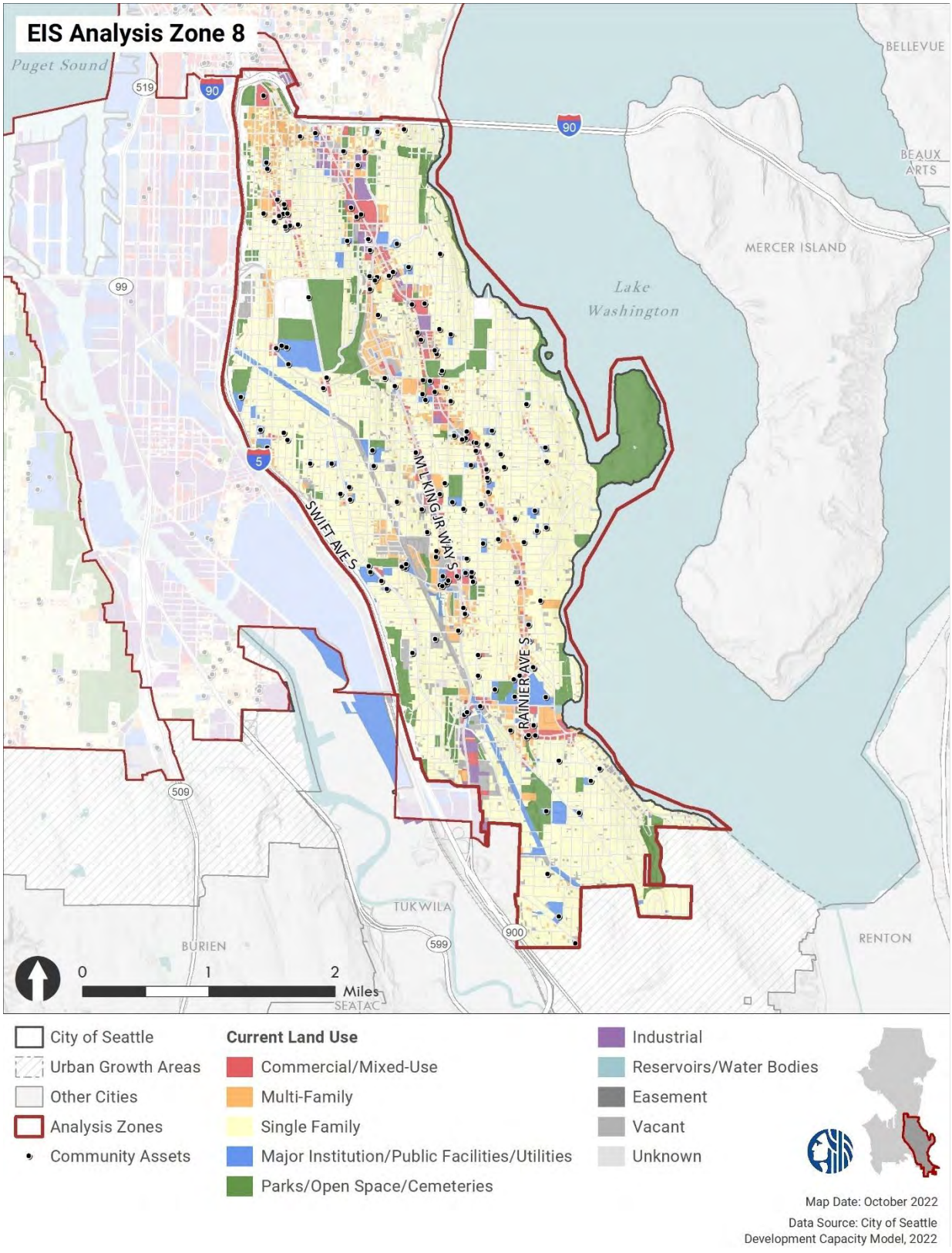
General Urban Form

Urban form in the Rainier Valley is relatively disjointed and more auto-oriented compared to most areas of the city. This is likely a result of multiple factors including:

- Topography that cuts against the standard north–south street grid in most places.
- Historic disinvestment.
- The legacy of redlining and racist real estate practices.
- Construction of I-90 through the Atlantic neighborhood in the late 20th century.

Redevelopment of the light rail station areas over the last decade has and continues to dramatically change urban form. Notably, five large sites in the immediate Othello station area redeveloped with 6- to 7-story mixed-use buildings. Rainier Beach is also seeing multiple 4- to 6-story apartment/condo buildings and 3-story townhouses constructed and/or in the development process. See **Exhibit 3.6-67**.

Exhibit 3.6-66. Area 8: SE Seattle—Current Land Use



Source: City of Seattle, 2022; BERK, 2022.

Exhibit 3.6-67. Five Major Redevelopments at Othello, 2009-2022



Source: Google Earth, Image US Geological Survey, Imagery Date 4/30/2009 and 8/21/2022.

Heights

The tallest buildings in Area 8 are found along the light rail alignment near stations and in the North Rainier, North Beacon Hill, and Columbia City urban villages. Building heights in these areas are generally 5- to 7-stories right off of Rainer Avenue, Martin Luther King Jr Way, and next to light rail stations. Heights drop to 3- and 4-story buildings 1 to 2 blocks from the major arterials. However, most of the rest of the analysis area is zoned Neighborhood Residential and has building heights of 1 to 2 floors.

Shadows

The location of Mt Baker, Columbia City, Othello (east side), and Rainier Beach (north side) urban villages in a valley with slopes to the south and west creates a relatively shady environment in winter months.

3.6.2 Impacts

Local land development patterns and zoning policies fundamentally affect many of the critical factors that shape the form and character of Seattle and the neighborhoods within, directly affecting people's access to housing, jobs, schools, open space, public services, and transportation. Restrictions on density or large-lot requirements, for example, affect housing supply and price, while limiting where families with low incomes can afford to live and attend school. Overly restrictive land use regulations can also narrow economic opportunities for workers or encourage expansion outward, increasing travel by car and greenhouse gas emissions (GHSs). This section focuses on the potential impacts—including equity and climate vulnerability considerations—of changes in land use patterns, permitted uses, or development intensities. Impacts are discussed based on the following categories:

- **Land use patterns** consider the distribution of growth and intensity of planned uses as well as resulting activity levels.
- **Land use compatibility** considers changes in use type between adjacent areas and any likely incompatibilities. Land use incompatibilities could be related to health and safety (such as noise levels or odors), activity levels at various times of day/night, or conflicting movement patterns.
- **Height, bulk, and scale** considers the physical form, aesthetic, and character of development (such as massing, setbacks, height, and FAR).
- **Transitions** consider visual changes in physical form between adjacent areas.
- **Tree canopy** considers how urban form affects tree canopy.
- **Shadows** consider shading of public open space or rights-of-way as a result of allowed development and the possible implications related to health, urban heat, and the human experience.
- **Views** consider the protection of public views of important landmarks and natural features, as well as views from specific designated viewpoints within the city and scenic qualities along mapped scenic routes.

Impacts Common to All Alternatives

Land Use Patterns

Seattle will likely continue to experience housing and employment growth under all alternatives consistent with the planning estimates described in **Chapter 2**. Activity levels would increase across the city with new residents, businesses, and employees. The alternatives differ primarily in the distribution and intensity of growth across the city and the projected land use patterns. The actual pace and distribution of future growth would be influenced in part by the implementation of comprehensive plan policies, related regulations and actions, and decisions made by individual property owners and developers.

In general, all alternatives would focus most future growth into centers currently characterized by higher densities, more compact building forms, and a more diverse mix of uses than other areas of the city. Under all alternatives, 80,000 new housing units would be distributed based on past growth and Comprehensive Plan targets, resulting in growth primarily in existing centers and villages. In the action alternatives, 20,000 or 40,000 additional housing units would be accommodated in new place types or expanded center boundaries located throughout the city depending on the alternative. All alternatives assume the same overall growth in jobs with a little over half of job growth in Downtown/South Lake Union (Area 4) and about 9% in the Duwamish Manufacturing Industrial Center (Area 7). Alternatives 2, 3, and 4 assume a small job shift from the larger centers towards other place types to reflect local demand with the distribution of new housing. The distribution of jobs and housing under Alternative 5 would be a combination of the other alternatives after accounting for expanded urban village boundaries and potential changes to place type designations.

The six urban centers and two MICs are currently designated PSRC ~~Metro~~ Regional Growth Centers (RGCs) and Employment MICs, respectively, and would retain these designations under all alternatives. Downtown, First Hill/Capitol Hill, South Lake Union, and Uptown would meet PSRC's future activity unit threshold for Metro RGCs under all alternatives. University District and Northgate would meet PSRC's future activity unit threshold for Urban RGCs under all alternatives which could result in redesignation from Metro to Urban RGC in the future. The City could also seek to designate the other urban villages as countywide growth centers under King County CPP framework. Activity units per acre would increase in all of the centers under Alternatives 1-4 and in most centers under Alternative 5. The boundary of some regional and urban centers (currently called urban centers and urban villages) would be expanded under Alternative 5 and the Preferred Alternative to meet the minimum size threshold resulting in a decrease in activity units per acre within the boundaries of West Seattle Junction, Admiral, Greenwood–Phinney Ridge, Morgan Junction, and Upper Queen Anne. Future activity units per acre are discussed in more detail under each alternative.

See also **Section 3.7 Relationship to Plans, Policies, & Regulations** for more discussion of PSRC ~~Metro~~ Regional Growth Centers and King County Countywide Centers.

As a result of these growth distributions, Seattle's land use pattern—broadly defined—would continue to emphasize:

- Growth leading to a denser and more continuous pattern of intensive land uses in the city's geographic center (Downtown plus the surrounding neighborhood districts including Uptown, South Lake Union, Capitol Hill, and First Hill).
- Business and port-related activity and employment growth within two central Port and industrial-use centers (Greater Duwamish MIC and BINMIC). All alternatives studied in this EIS include changes implemented as part of the Industrial and Maritime Strategy.
- Growth in a wide range of other mixed-use centers such as Fremont, Columbia City and West Seattle Junction distributed through the various sectors of the city, including centers located along major transportation corridors (such as Aurora Avenue, Lake City Way, MLK

Jr Way, Rainier Avenue, and California Avenue) that radiate through the various geographic sectors and industrial-use centers.

- More residents, employees, and buildings would be exposed to increased climate risks in many of the centers without additional mitigation. For example, the Downtown/South Lake Union (Area 4) and Duwamish Manufacturing Industrial Center (Area 7) are generally "heat islands" with more pavement and almost no areas with more than 10% tree canopy cover (see **Section 3.3 Plants & Animals** and **Section 3.11 Public Services**).

Land use patterns in areas outside of the centers would vary depending on the alternative as discussed below.

Land Use Compatibility

Housing and employment growth under all alternatives will result in additional development and redevelopment activity citywide. Future growth under all alternatives is likely to increase the frequency of different land use types locating close to one another, and similarly likely to increase the frequency of land use patterns that contain mixes of land uses with differing levels of intensity, both within the centers and, to a varying extent, in other areas of the city. Mixing uses in centers is a goal of the current Comprehensive Plan because having a variety of uses near one another allows people to conduct more of their daily business without driving and reduce GHG emissions; however, some adjacencies could potentially cause adverse compatibility impacts on less intense uses. Over time, infill development and redevelopment would occur throughout the city to accommodate increased growth under all alternatives, gradually increasing the intensity of development in areas not currently developed to their full zoning capacity. The extent of these conflicts varies by alternative and would continue to be mitigated through the application of existing development regulations.

New mixed-use development may also be introduced under any of the alternatives to areas originally developed under zones which previously allowed only one type of use. This could occur in centers where zoning has already changed since original construction, or where zoning could potentially change under an alternative if rezones to mixed use zones occur in the future. More mixing of uses increases the likelihood of localized adverse spillover effects (such as residential or commercial activities that might lead to increased noise). These compatibility challenges would not be an uncommon or new phenomenon within Seattle's more urbanized centers, but they would represent a potential adverse land use impact of future growth under any alternative. Such impacts can be avoided or mitigated by continuing to implement land use policies and zoning patterns that consider the potential for land use incompatibilities and avoid them through use of transitions in intensity, use restrictions, and/or avoiding proximity of certain kinds of zones. Noise, nuisance, and public safety codes would also continue to provide protection against some of the potential impacts.

Ballard Urban Village & Ballard-Interbay MIC: Land Use Compatibility Conflicts

Most of the southern boundary of the Ballard Urban Village is adjacent to the Ballard-Interbay MIC. Land use compatibility conflicts near this boundary are anticipated under all alternatives and would be similar to those already occurring. Existing land uses in the Ballard MIC north of Leary Way, for example, include a diverse array of industrial, commercial/retail (including a high concentration of breweries and tap rooms), office storage, and some residential uses in blocks flanking 14th Ave NW. These currently abut larger multifamily development on the south side of NW Market St, commercial development on 15th Ave NW, and 1- to 3-story residential east of 11th Ave NW outside the MIC (in the Ballard Urban Village and in multi-family residential areas).

Redevelopment under all alternatives in the urban village and portions of the MIC are expected to be fueled by proximity to light rail. Within the MIC, blocks recently rezoned Industry and Innovation (II) as part of the Industrial and Maritime Strategy legislation (effective on October 23, 2023) would likely be developed with a significant amount of dense employment in multistory structures, including some towers, with dedicated space for ground floor light industry. This generally includes the area between 15th Ave NW and 11th Ave NW north of Leary Way adjacent to the Ballard Urban Village (the 14th Ave corridor). Per the Industrial and Maritime Strategy Final EIS, redevelopment in the 14th Ave corridor would contribute to an agglomeration of daytime employment uses in conjunction with nearby activity in the Ballard Urban Village that would generate higher volumes of daytime workers unrelated to industrial operations.

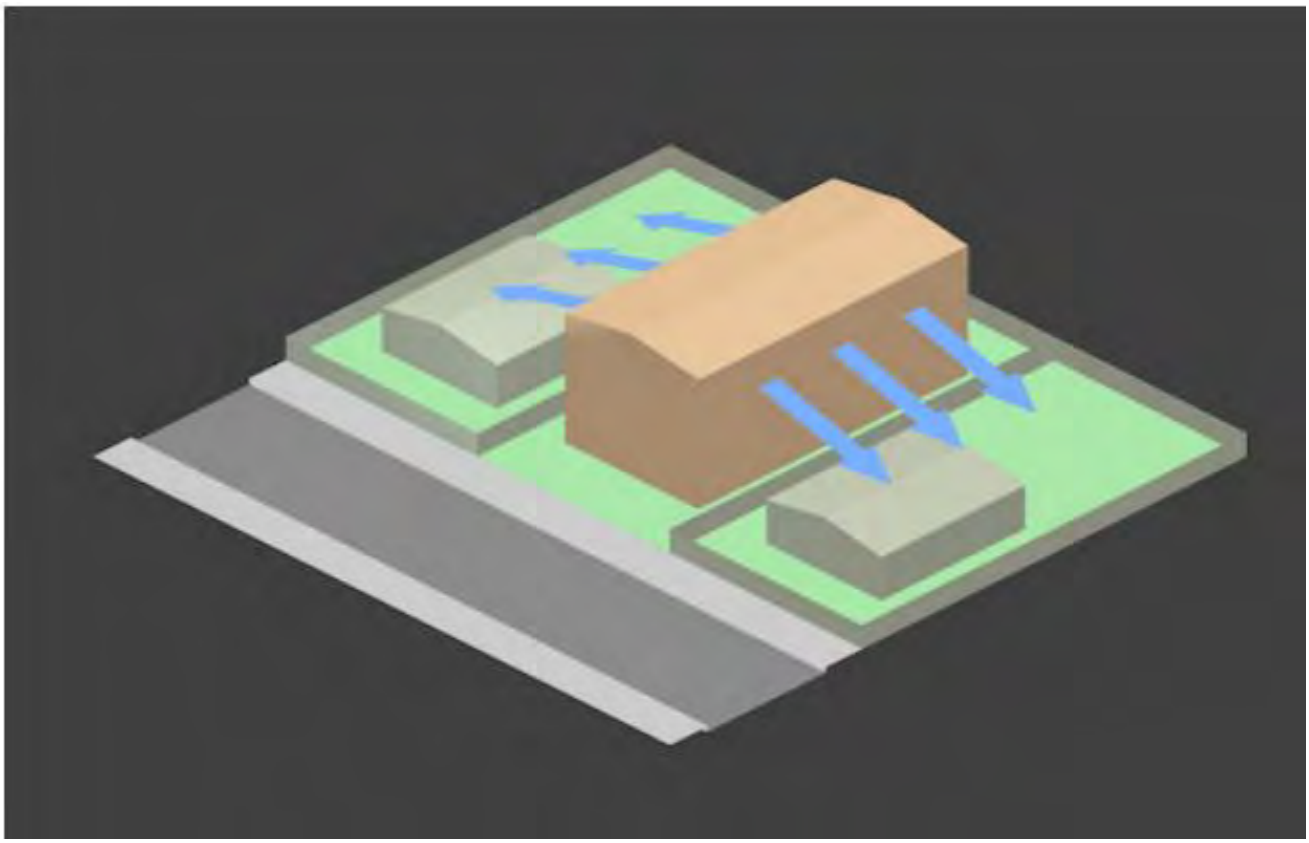
Urban Form

Height, Bulk, & Scale

Future growth and development directed into existing centers under all alternatives would result in a moderate amount of additional height and bulk in these commercial and mixed-use nodes. The overall height, bulk, and scale implications from such development would likely be consistent with that experienced during growth over the last 20 years (e.g., mid- and high-rise buildings for both housing and employment uses in urban centers and low- and mid-rise buildings in urban villages). Residential areas will see limited changes to height, but more development of ADUs will add more buildings to these areas.

The present combination of height, FAR, and setback regulations with small to regular sized lots generally leads to bulky buildings that take up most of the lot (see **Exhibit 3.6-68**). Some characteristics that can be found in bulkier buildings include windows that primarily face neighboring properties, thin strips of outdoor space that struggle to be functional, and spots of semi-permanent shade (The Coalition for More Homes, 2021).

Exhibit 3.6-68. Bulky Buildings



Note: Bulkier buildings are sometimes referred to as sausage flats. Image is an illustration of some of the characteristics found with bulky buildings.
Source: The Coalition for More Homes—New Zealand, 2021

Transitions

Gradual redevelopment of new buildings that are larger than those they replace is likely to occur under all alternatives, especially in urban centers and villages. This redevelopment could lead to starker transitions between individual properties and between different zones and place types.

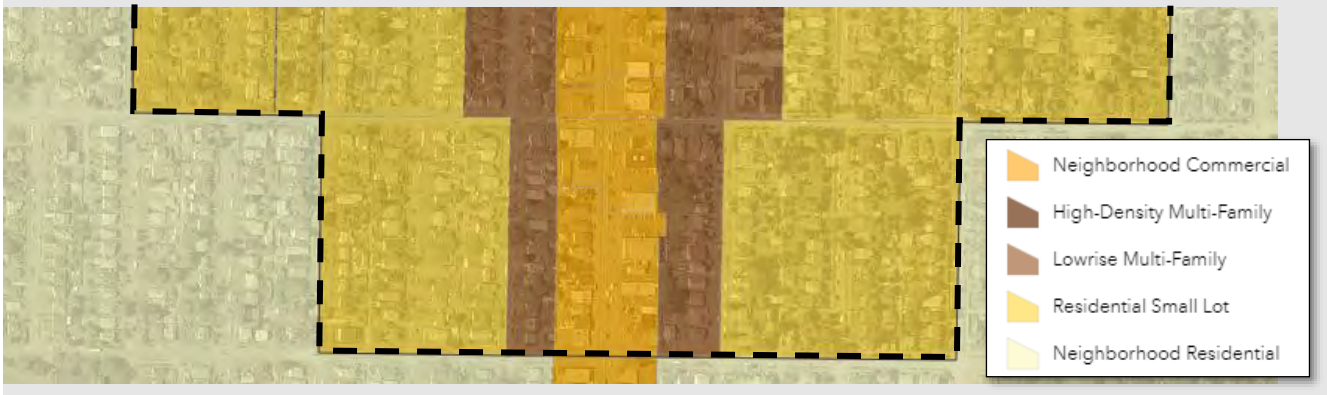
Redevelopment would create a potential for localized adverse compatibility issues as existing, lower-intensity uses transition to higher-intensity development forms. For example, areas predominately composed of detached homes may experience more occurrences of sharper transitions in urban form as new, more intensive forms—such as townhomes and apartments—could be built alongside existing structures.

Redevelopment could also result in sharper transitions between zones and place types. The urban centers and villages typically include a range of zones with mixed-use zones (usually Neighborhood Commercial (NC)) at the core, surrounded by residential zones at progressively lower densities (Midrise (MR), Lowrise (LR), and Residential Small Lot (RSL)). **Exhibit 3.6-69** shows a typical zoning pattern. This arrangement of zones moderates transitions in height and

bulk from the core to the rest of the infill area, and from the infill area boundary to surrounding low-density areas.

Over time, edges between low-density areas and centers may become increasingly stark depending on the alternative. Alternatives with little or no expansion of infill areas may see more concentrated infill and starker contrasts in transitional areas between growth and surrounding areas. Alternatives that expand urban centers or villages may see more gradual transitions. The border between the Downtown and First Hill/Capitol Hill urban centers and less intense neighborhoods to the east and northeast will continue to be a major transition from greater to lesser intensity under all alternatives.

Exhibit 3.6-69. Typical Urban Village Zones



Notes: The map shows a typical progression of zones from the edge (dashed line), with lower height and intensity zones, to the core of the village, with the greater intensity zones. 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 the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle, 2023.

Tree Canopy

Bulkier development under all alternatives would likely displace some trees on private property, especially in residential zones. At the same time, the number of street trees may increase where they are required with redevelopment. See **Exhibit 3.6-70** and **Exhibit 3.6-71**. The City's ownership of rights of way, community facilities, and parks also offer great opportunity to add trees to meet the City's 30% tree canopy goal and reduce heat islands.[27]

[27] Tress in public rights-of-way play an important role in contributing to canopy cover citywide—rights-of-way currently make up 27% of the city's land area and trees in the rights-of-way contribute 23% toward the city's canopy cover. See **Section 3.3 Plants & Animals**.

Exhibit 3.6-70. Street Trees with Redevelopment



Note: Recent townhouse developments in Seattle with street trees provided, even when it means shifting the sidewalk onto private property. Two photos on left have alley access, while the photo on the right has driveways.
Sources: MAKERS, 2023.

Exhibit 3.6-71. Townhouses with Retained Tree



Sources: MAKERS, 2023.

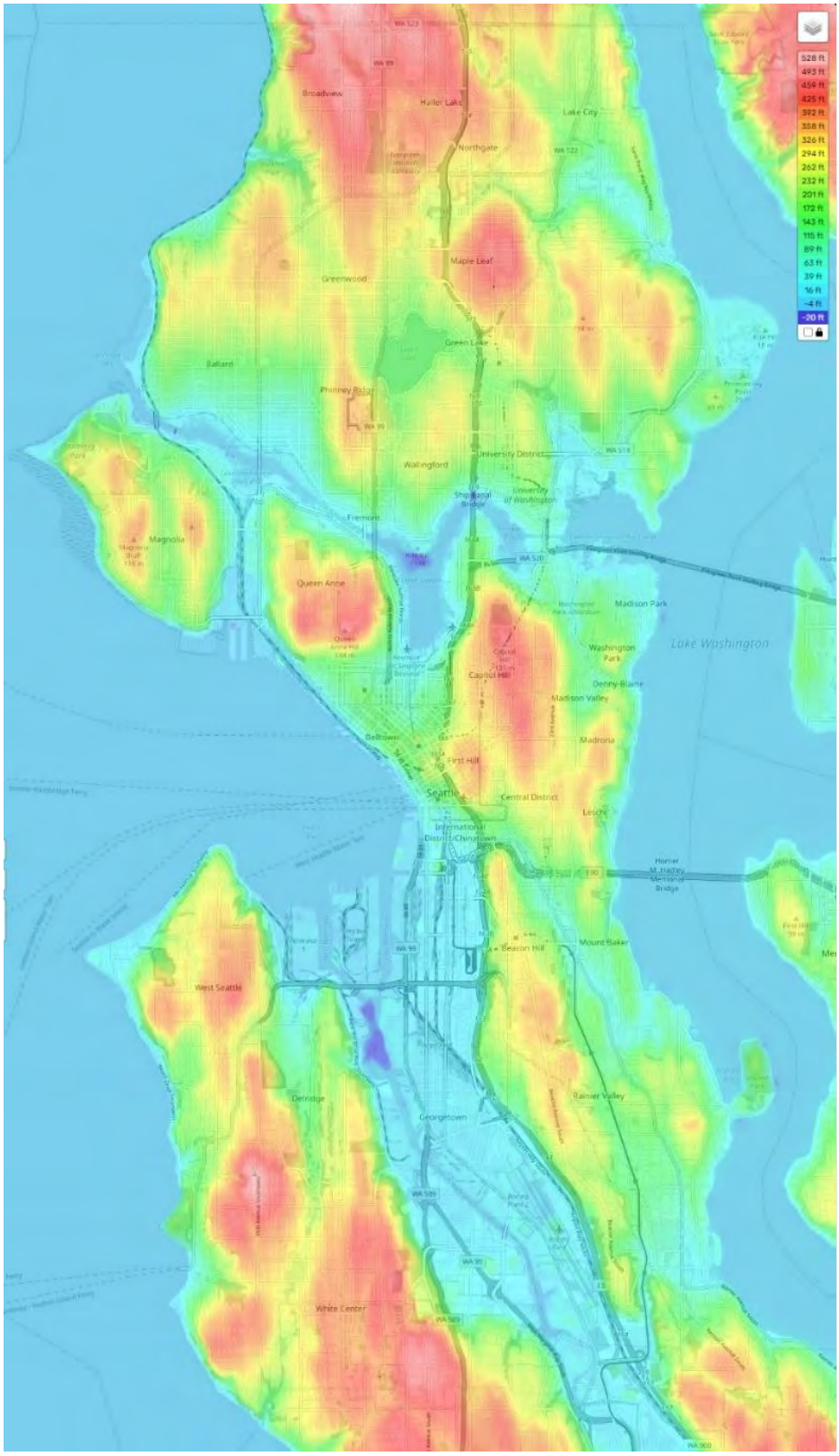
Shadows

Under any alternative, redevelopment will generally be taller and often bulkier than the existing building. Taller buildings cast longer shadows, and bulkier buildings cast wider shadows. A combination of tall and wide can mean large areas become shaded during much or all of the day, especially during winter.

In addition, shadows falling downhill cover greater distances, meaning that buildings toward the top of a north-facing hill can be especially impactful in casting shadows downhill. Likewise, buildings on east-facing hills have strong impacts on afternoon solar access downhill, and buildings on west-facing hills have strong impacts on morning sunlight downhill. **Exhibit 3.6-72** show the topography of Seattle with warmer colors representing higher elevations and cooler colors representing lower elevations. Several hills, combined with taller buildings, would have greater shadow impacts on their generally north sides, such as Crown Hill, Maple Leaf, View Ridge, Wallingford/Tangletown, Magnolia, Queen Anne, Capitol Hill, Washington Park, First Hill, Madrona, West Seattle, High Point, Highland Park, Beacon Hill, Graham Hill, and Rainier View.

Existing trees accustomed to full sun, whether in public right-of-way or on private property, may be harmed if their solar access is reduced which could limit growth or reduce the health of the tree. For streets already shaded, new street trees are selected for their tolerance to lower direct sunlight levels (Seattle Right-of-Way Improvements Manual 3.7 Street Trees). Building shadows may fall on existing solar panels or sites of future panels, but the buildings themselves may provide new opportunities for solar. Given the citywide scale, this analysis does not address this potential impact.

Exhibit 3.6-72. Seattle Topographic Map

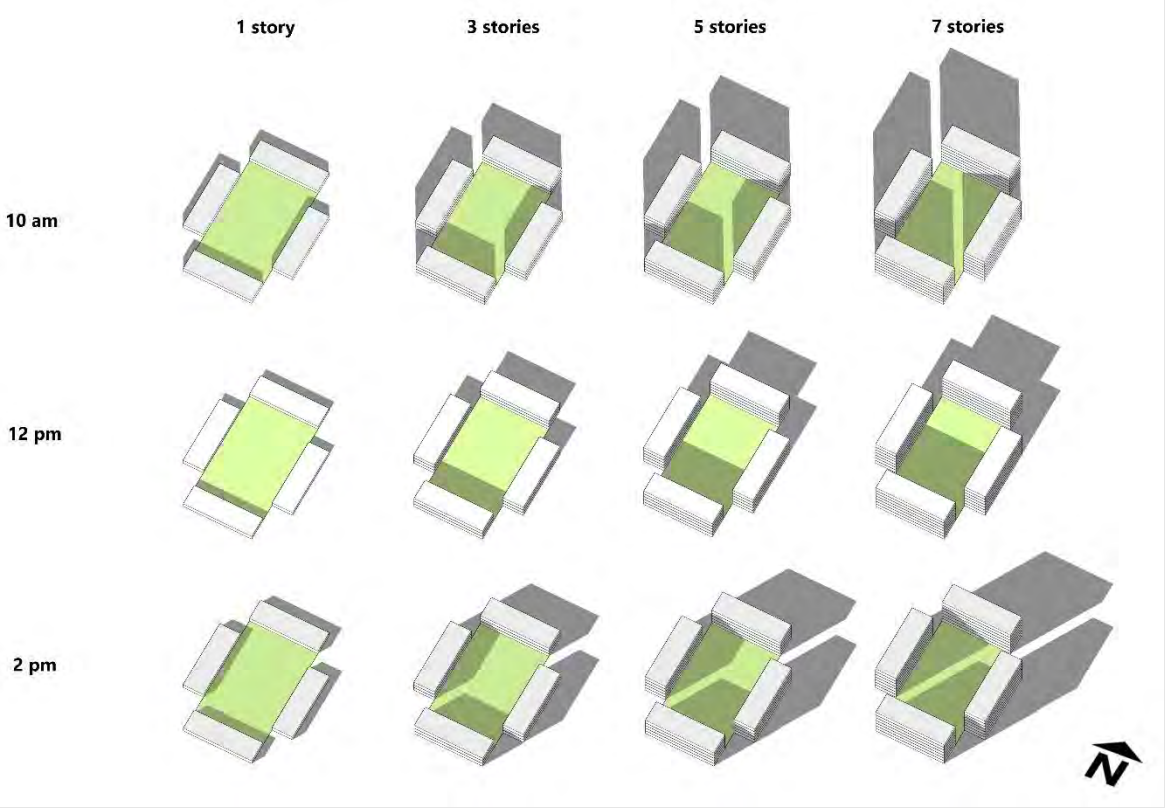


Source: World Topographic Map, TessaDEM, and Open Street Map, 2023 (CC-BY-SA 3.0).

Shadows on Public Parks

Some development would likely occur adjacent to parks under all alternatives. As **Exhibit 3.6-73** illustrates, an adjacent southern building is most impactful throughout the day. For afternoon sunlight (which is often a desired time to visit plazas and parks), adjacent southern and western buildings cast long shadows into a park. Winter solar access can be limited when buildings are 5 or more stories. Summertime shadow impacts may help mitigate urban heat.

Exhibit 3.6-73 Building Height Impact on Shadows over Example Park on Winter Solstice

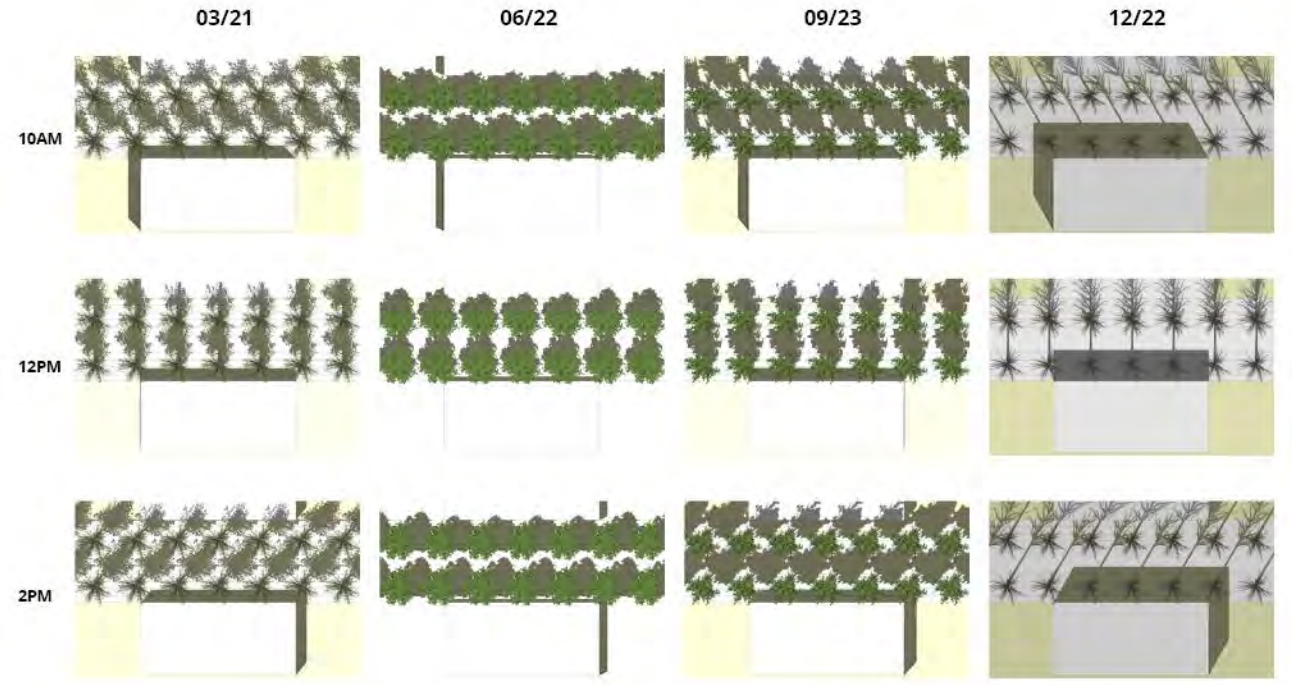


Note: The diagram shows "worst-case" shadows taking place on winter solstice. The illustration shows an example park approximately 200 feet by 300 feet, buildings with a 15-foot ground floor and 10-foot upper stories, and buildings approximately 60 feet wide.
Source: MAKERS, 2022

Shadows on Rights-of-Way

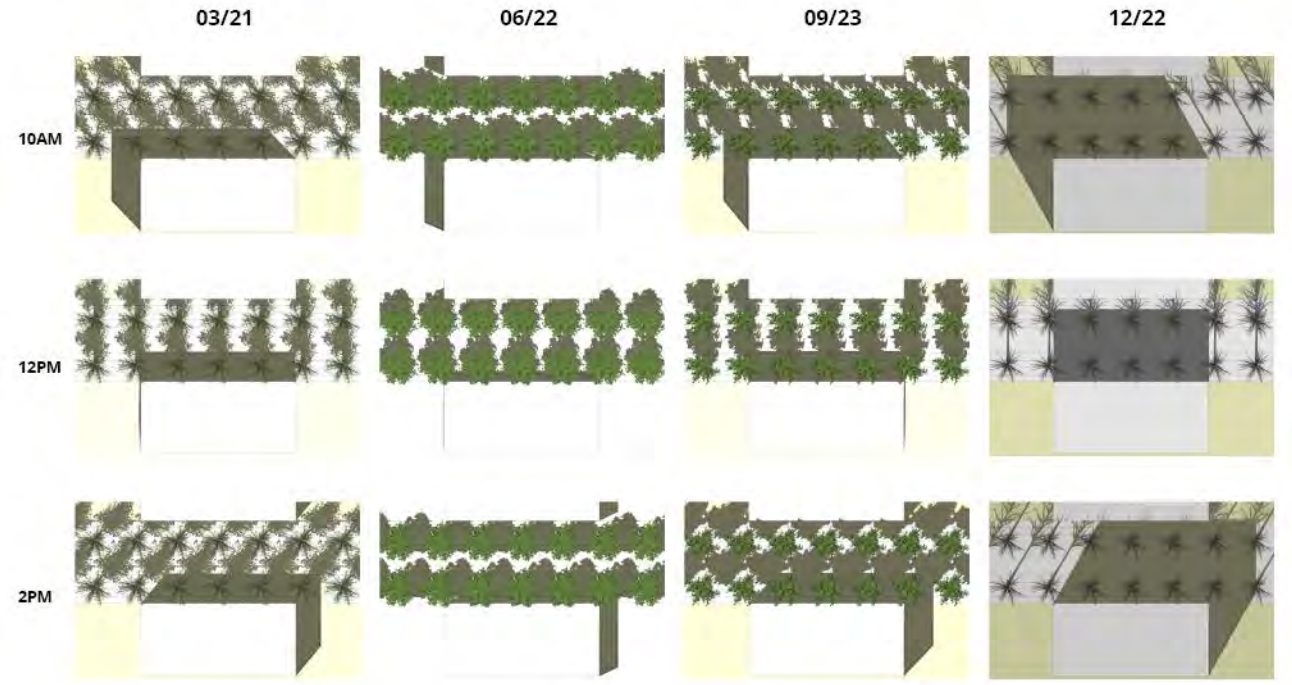
Height limits and street widths vary throughout Seattle, but in all cases, east-west-oriented streets are challenging for solar access, especially during wintertime. In most cases, the 3-story and taller buildings on the south side would shade the southern side of the street throughout the year except summertime and may shade both sides of the street throughout a winter day. Other street orientations would also experience increased shadows with taller redevelopment, but to a lesser degree. See **Exhibit 3.6-74**, **Exhibit 3.6-75**, and **Exhibit 3.6-76**.

Exhibit 3.6-74. 1-Story Building's Shadows on Street



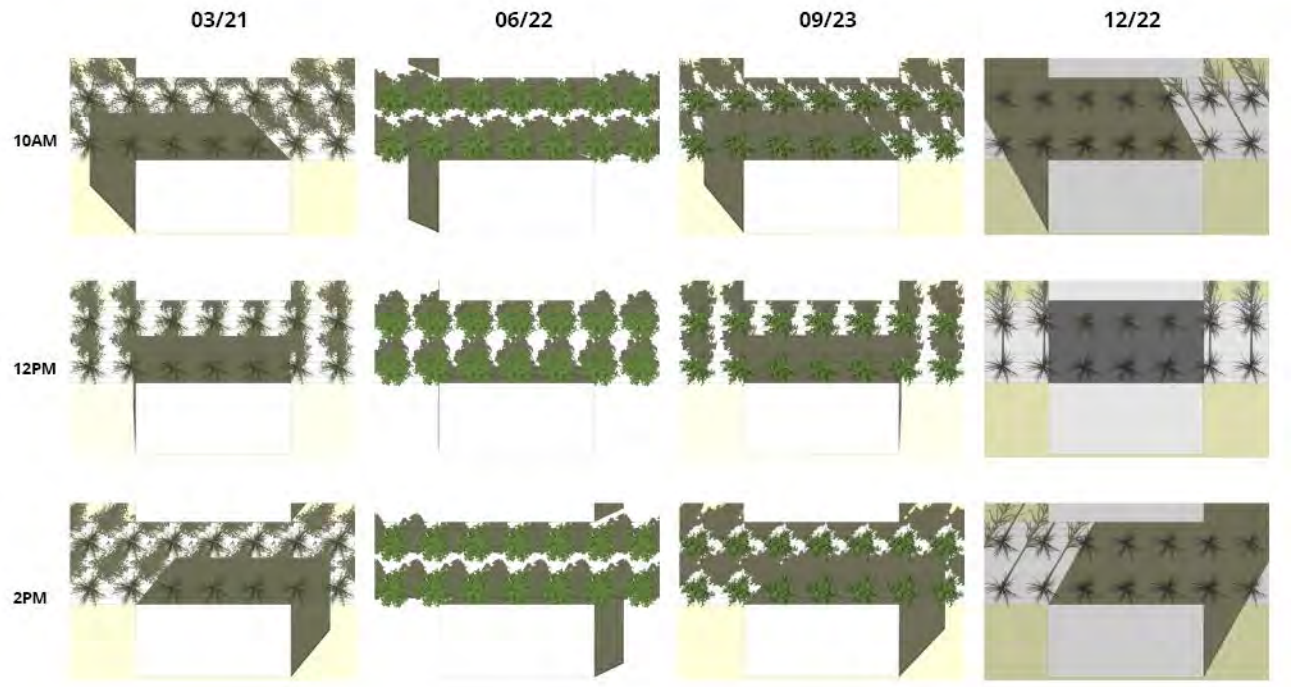
Sources: MAKERS, 2023.

Exhibit 3.6-75. 3-Story Building's Shadows on Street



Sources: MAKERS, 2023.

Exhibit 3.6-76. 5-Story Building's Shadows on Street



Sources: MAKERS, 2023.

Summertime solar access is included in the shadows analysis depictions. However, it is important to note that, during summertime, shadows may be a positive impact. Deciduous trees typically intentionally shade many public spaces to cool the area. With the urban heat island effect and increasingly common instances of extreme heat, building shadows may similarly be considered a positive impact in summertime.

Views

Under all alternatives, new buildings would develop with greater height and bulk, and, with these increases, development may interfere with publicly protected views. Because these views are protected under current regulations, views would remain unobstructed as long as potential impacts are identified during permit review. Of note, the number of SEPA-protected viewpoints, scenic routes, and Seattle-designated historic landmarks means that view corridors impact development capacity on many sites.

Impacts to protected views in many places would likely be fairly minor because most, although not all, SEPA-protected public viewpoints are located away from centers and villages instead capturing scenic views at edges of hillsides, parks, beaches, and schools. Likewise, many shoreline viewpoints are nestled on the coastlines within semi-secluded sites, providing uninterrupted view of the Puget Sound, Lake Washington, and Lake Union.

Views from defined scenic routes are more difficult to generalize but are often views down corridors to distant features (such as Mount Rainier or the Seattle skyline) and/or are episodic in nature, meaning only certain places along the routes have the best scenic qualities that might be adversely affected by future development. The precise nature and degree of potential future view disruptions along scenic routes would depend upon specific locational view qualities and individual project designs.

Landmarks are generally clustered in urban centers with some in urban villages and some dispersed elsewhere. There is no meaningful relationship between the protected viewpoints/scenic routes and the landmarks. Each historic landmark and site has unique conditions and would need to be evaluated at the project, not programmatic, scale.

130th/145th Station Area

The 130th/145th Station Areas will likely redevelop under all alternatives, although the scale, location, and intensity of that development would vary by alternative. Some commonalities include:

- **Height/bulk/scale.** Large superblocks (longer than 600 feet) lacking a connected internal path or street network mean that direct routes to access the station will be challenging without regulations to encourage or require through-connections with redevelopment. Redevelopment at the light rail station would occur in a physically bifurcated, uncomfortable human environment (at 5th Ave NE, Roosevelt Way, and I-5) and could miss an opportunity to celebrate and activate the station entry.
- **Tree canopy.** Plentiful evergreens, steep slopes, Thornton Creek, and environmentally critical areas near the 130th Station Area make development here unique, and perhaps more constrained, than many other Seattle areas. Existing large evergreen trees make residential areas feel set in hillside woods. Tree preservation could impact development capacity, and redevelopment with a loss of existing trees would have a noticeable effect on the human experience and sense of being set in nature.
- **Shadows.** In general, the existing tall evergreens, combined with steep slopes, significantly shade many residential areas. Shadow impacts from increases in building heights would be less noticeable in these residential areas because of those existing shadows. The north-south orientation of 15th Ave NE, as well as to a lesser extent the diagonal orientation of Roosevelt Way NE, allows for greater solar access for longer hours throughout the year, even with increases in building heights.

Specific land use and urban form impacts in the station areas are described under each alternative below.

Equity & Climate Vulnerability Considerations

Housing policy and zoning laws have a history of causing harm to Black, Indigenous, and People of Color in Seattle (see **Racially Restrictive Covenants & Zoning Laws** above). Additionally,

the high cost of housing makes it very difficult for people to find housing near jobs, schools, friends, and family and perpetuates existing inequalities. The land use patterns proposed under each alternative, as well as potential resulting compatibility conflicts, are evaluated below for their likelihood to intensify or lessen these historical inequities.

Height and Density: Relationship to Housing Supply & Affordability

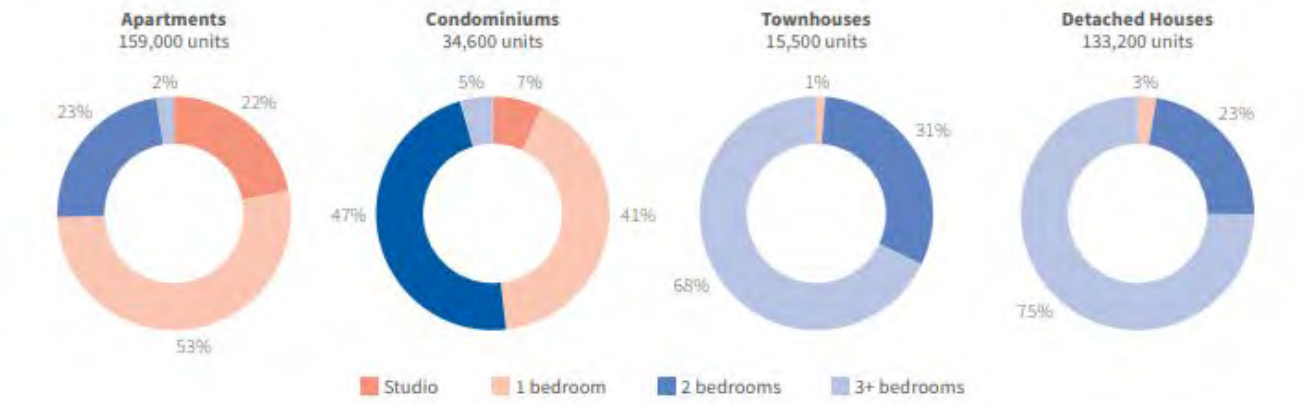
The height of a residential building is an important indicator of how many housing units can fit in one building and is strongly correlated with density. Taller buildings are generally denser and have more units than shorter buildings. Dense housing splits the cost of housing development among more households meaning the cost per household is more economical than low density housing.

The large area (about 80%) of Seattle's residential land being zoned for shorter, low-density housing constricts the choices people have on where they can live in Seattle. A broad, citywide approach to allowing increased density with taller buildings would likely have more equitable impacts to housing choice, a more varied urban form, and more opportunity for vibrant neighborhoods.

See also **Section 3.8 Population, Housing, & Employment** for more discussion of the relationship between housing and equity and climate vulnerability considerations.

The present combinations of allowed height, FAR, and setbacks found in Seattle's zoning regulations generally led to denser housing with many studio and 1-bedroom units over the last 20 years. As **Exhibit 3.6-77** indicates, 2% of apartments and 5% of condominiums in Seattle have 3+ bedrooms (City of Seattle & King County Department of Assessments, 2019). This has meant family size housing or units large enough for households with children is consistently scarce in Seattle and also unaffordable to most households with children or looking to have children. The lack of 3+ bedroom multi-family housing means that children and families are limited in housing choices in the city limits or means that families crowd into smaller units. However, allowing a wide variety of housing types may open up opportunities for more multi-family housing that is child and family friendly.

Exhibit 3.6-77. Bedroom Unit Diversity in Seattle Housing Stock



Source: City of Seattle, Housing Choices Background Report, 2019.

Relationship to Active Transportation

In general, the regional center, urban center, and neighborhood center place types, as well as increased density overall, would allow more people to live in walkable/bikeable/rollable communities with improved access to transit. This would mitigate climate impacts and improve chances at social connectedness:

See also **Section 3.10 Transportation**.

- Density decreases reliance on cars, enables easier mode shift, and lowers vehicle miles traveled (VMT) (IPCC, 2022). A broad, citywide approach to allowing increased density would likely improve Seattle's response to climate change. See **Section 3.2 Air Quality & GHG Emissions**.
- Development that improves conditions for active, human-powered travel and public transportation use decreases social isolation and increases chances for social interaction and wellbeing (Mattison et al., 2015; Holt-Lunstad, 2020; National Academies of Sciences, Engineering, and Medicine, 2020). A broad, citywide approach to allowing increased density would likely have more equitable impacts to human health and wellbeing.

Relationship to Street-level Community-building Spaces

A lively, vibrant neighborhood center is dependent on having a robust residential population nearby. The expected patterns of development, with increased height, bulk, and scale, could improve the ability to gather in public places and cultural anchors (i.e., culturally relevant businesses, services, religious institutions, arts, etc.), as long as commercial space displacement is mitigated and appropriate gathering spaces are provided. Upzones in high displacement risk areas may have a greater immediate impact on the street-level experience with construction impacts and potential displacement of cultural anchors. However, in the long term, with appropriate mitigation, equitable development could improve conditions. The Africatown development at 23rd and Union in the Central District is an example of this, where the Liberty

Bank Building honors Black resilience to redlining, affordable housing is marketed to Black people who had been displaced from the Central District, and affordable commercial space for Black-owned businesses and services and a plaza for community gathering are provided.

Residential Design for Social Wellbeing & Sociability

A lack of social connections increases the risk of many health issues and chronic stress (CDC, 2021). Loneliness is most prevalent in low-density areas where commuting by car reduces opportunities for social interactions and high-rise buildings if residential design does not promote community and relationship building (Mattisson et al., 2015; Kalantari and Shepley, 2021).

To promote social connection, Health Affairs recommends policies such as, "Diversify housing design to incorporate communal and workspaces to encourage social interaction and reduce commute times, urban design that balances public and private space, housing to better serve changing demographics" (Health Affairs, 2020). A broad, citywide approach to allowing increased density would likely support policy recommendations from Health Affairs.

Happy Cities' *Designed to Engage* report and *Happy Homes Interactive Toolkit* offer policy and development standard recommendations for designing multi-family housing to promote sociability, such as missing middle and diverse housing types, social corridors in multi-family buildings, open/amenity space open only to residents, and breaking down the number of households using a shared entrance or corridor (Happy Cities, 2020). Taller, thin, small lot, dense multi-family housing, such as point access block apartments, are building types that align well with residential design for sociability. Seattle's building code allows up to four units off of one stairwell, allowing for opportunities for social interaction with neighbors and the ability to build trust with neighbors. Thinner buildings allow for more open space. A broad, citywide approach to allowing increased density with taller buildings would likely improve residential design for sociability and social wellbeing.

Climate Change

Like the greater Puget Sound region, Seattle is already experiencing extreme climate events consistent with climate change projections. Areas of the city that could pose greater risks to residents and businesses include sea level rise particularly along the Duwamish River as well as along marine waters of Areas 1, 3, 4, and 6. Along the edges of the city and water bodies are geologic hazard areas like landslides or erosion hazard areas where extreme precipitation could increase the land affected (see **Section 3.1 Earth & Water Quality**). Locations where there could be greater exposure to extreme heat include places with more impervious area and less tree canopy. Tree canopy, for example, is largely absent from Downtown and major industrial areas along the Duwamish Waterway and in Interbay (see **Section 3.3 Plants & Animals**). The alternatives vary in their proposed concentration of growth in areas vulnerable to climate risks or in their level of opportunity to incorporate additional climate resilience strategies. Most population will be concentrated in centers or corridors away from most hazards, especially under Alternatives 1, 2, and 4. Distributing more growth in urban

neighborhoods under Alternatives 3 and 5 could increase the potential for populations to be closer to hazards or affected by interruptions in access to their neighborhoods. All action alternatives include a new Environment and Climate Element that incorporate mitigation and adaptation strategies and include policies regarding tree canopy protection or enhancement and critical area regulations. Utility providers are also developing system plans that anticipate climate change effects (e.g., stormwater plans) to help reduce effects.

Impacts of Alternative 1: No Action

Land Use Patterns & Compatibility

Alternative 1, No Action, would maintain the status quo of focusing most housing and jobs within existing centers and villages with limited change to land use patterns outside of those proposed as part of the recent Industrial and Maritime Strategy EIS. See **Exhibit 2.4-4.**

Homes and jobs would be distributed across the city based on observed growth between 2010 and 2020 and the distribution of growth in the Seattle 2035 Comprehensive Plan (current future land use designations are mapped citywide in **Exhibit 3.6-15**). New housing would continue to be primarily rental apartments concentrated in existing mixed-use areas with land outside the centers and villages limited primarily to high-cost detached houses. Most new housing would be in Area 4 encompassing the Downtown and South Lake Union urban centers, followed by Area 1 which contains the Ballard Urban Village and Area 5 which contains the First Hill/Capitol Hill Urban Center. New jobs would continue to be located primarily in existing centers and villages. Over time, infill development and redevelopment would occur throughout the city to accommodate increased growth, gradually increasing the intensity of development in areas not currently developed to their full zoning capacity. Growth would continue to be limited by existing zoned capacity (current generalized zoning is mapped citywide in **Exhibit 3.6-16**).

Future planned activity units per acre in each center and village under the No Action Alternative are listed in **Exhibit 3.6-78**. Like all alternatives, the six urban centers and two MICs would retain their designations as PSRC ~~Metro~~ Regional Growth Centers (RGCs) and Employment MICs, respectively, under the No Action Alternative. Most of the urban villages would meet King County's threshold of 30 future activity units per acre with the exception of Othello and Rainier Beach in Area 8 and South Park in Area 7. No center or village boundary changes are proposed as part of the No Action Alternative—several urban villages would continue to be outside the 160–500 acre size thresholds as described under **Impacts Common to All Alternatives**.

Land use incompatibilities would be similar to those observed today and described under **Impacts Common to All Alternatives** but could become more severe over time with continuing trends. Mixing of new and existing uses could generate adverse localized incompatibilities, either within centers and villages or at their periphery where more intense development could occur adjacent to low-intensity uses outside the center or village (see also the **Transitions** section below). Increased development intensity and the pace of change may

result in localized compatibility conflicts. These conflicts would continue to be managed by the application of existing development regulations and design standards. No significant adverse impacts are anticipated with respect to land use compatibility under the No Action Alternative.

Exhibit 3.6-78. Future Activity Units (AU)—Alternative 1: No Action

Center/Village	Existing AU/Ac.	Alt 1. Acres	Alt. 1 AU	Alt. 1 AU/Ac.
Urban Centers[1]				
Downtown	377.4	952	450,509	473.2
First Hill/Capitol Hill	139.5	916	149,746	163.4
University Community	54.5	753	52,890	70.2
South Lake Union	236.7	340	116,965	344.1
Uptown	131.3	333	53,775	161.3
Northgate	57.3	412	30,946	75.1
Hub Urban Villages[1]				
Ballard	67.7	495	48,030	96.9
Bitter Lake Village	44.0	364	20,147	55.4
Fremont	71.9	214	18,892	88.1
Lake City	57.6	142	10,719	75.4
Mt Baker	36.0	491	23,288	47.4
West Seattle Junction	70.4	269	26,981	100.2
Residential Urban Villages[1]				
23rd & Union-Jackson	38.9	625	29,080	46.5
Admiral	49.2	98	5,943	60.4
Aurora-Licton Springs	44.1	327	16,796	51.4
Columbia City	33.9	335	15,442	46.1
Crown Hill	25.3	271	8,509	31.4
Eastlake	70.2	199	16,337	82.0
Green Lake	70.6	109	9,500	87.4
Greenwood-Phinney Ridge	84.5	94	9,566	101.6
Madison-Miller	65.3	145	12,368	85.1
Morgan Junction	34.1	113	4,711	41.6
North Beacon Hill	28.1	267	9,196	34.5
Othello	23.7	499	14,480	29.0
Rainier Beach	23.0	346	9,015	26.0
Roosevelt	61.4	170	13,819	81.2
South Park	14.7	263]	4,860	18.5
Upper Queen Anne	89.5	53	5,814	110.5
Wallingford	42.2	258	13,274	51.5
Westwood-Highland Park	27.9	275	8,962	32.6

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 the other a~~A~~lternatives ~~2–5~~.
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 densities or size for the hub and residential 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.

Urban Form

Height, Bulk, & Scale

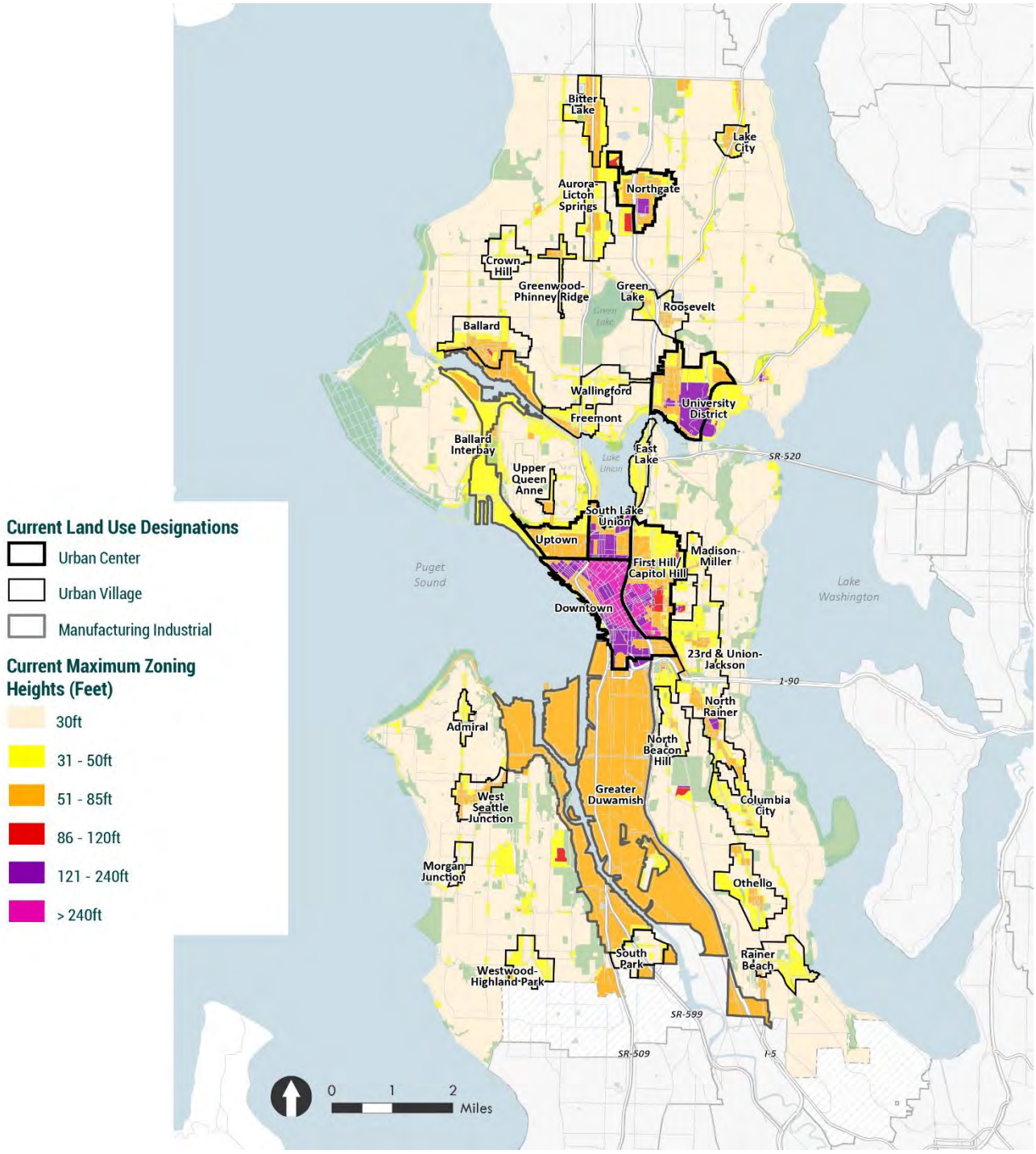
Impacts to height, bulk, and scale under Alternative 1 would be similar to the existing pattern described under Citywide Affected Environment. As growth is directed into existing centers and villages, a moderate amount of additional height and bulk would result from future development in these commercial and mixed-use nodes. The overall height, bulk, and scale implications from such future development would likely be consistent with that experienced during growth over the last twenty years.

As shown on **Exhibit 3.6-79**, urban centers allow the greatest building heights, particularly Downtown and South Lake Union, which results in mid- and high-rise buildings for both housing and employment uses. Urban villages allow a range of moderate and medium scale buildings, with building heights ranging from 30 feet to 85 feet, which results in low- and mid-rise buildings. Areas surrounding centers and villages are primarily zoned neighborhood residential which has a maximum height of 30 feet. Neighborhood residential zones would likely see more development of accessory dwelling units (ADUs) over the next 20 years. **Exhibit 3.6-80** shows 1-4 unit development that could happen in Neighborhood Residential zones under Alternative 1.

Related to the height of buildings, the bulk and size of building are influenced by zoned FAR. Urban centers allow the greatest FARs, followed by urban villages, and neighborhood residential. The relationship between height and FAR in many of Seattle's zones have led to a significant number of buildings developed during the last 20 years to be larger lot developments, which result in bulkier buildings than smaller lot developments. However, the City's existing development regulations and design review process are anticipated to be sufficient to reduce impacts to height, bulk, and scale to less than significant levels.

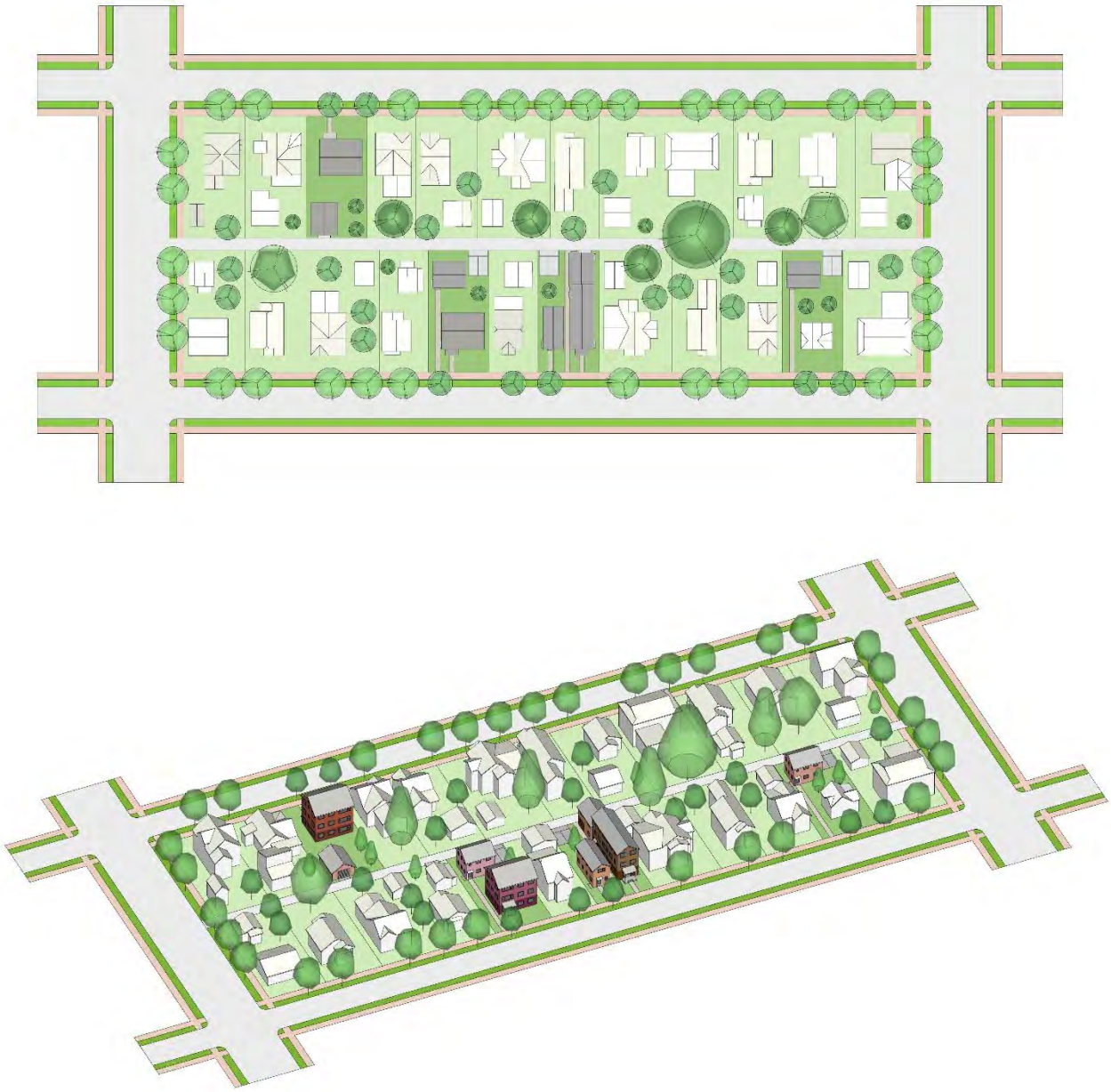
Exhibit 3.6-80, **Exhibit 3.6-81**, and **Exhibit 3.6-82** illustrate likely amounts and types of development in Neighborhood Residential zones over the next 20 years. Building types already allowed in these zones include attached and detached accessory dwelling units and in Residential Small Lot zones, multiple detached houses. The models show prototypical Seattle neighborhood blocks (no precise location) that include alleys, no alleys, and steeper terrain (with and without alleys).

Exhibit 3.6-79. Current Maximum Height Limits—Alternative 1: No Action



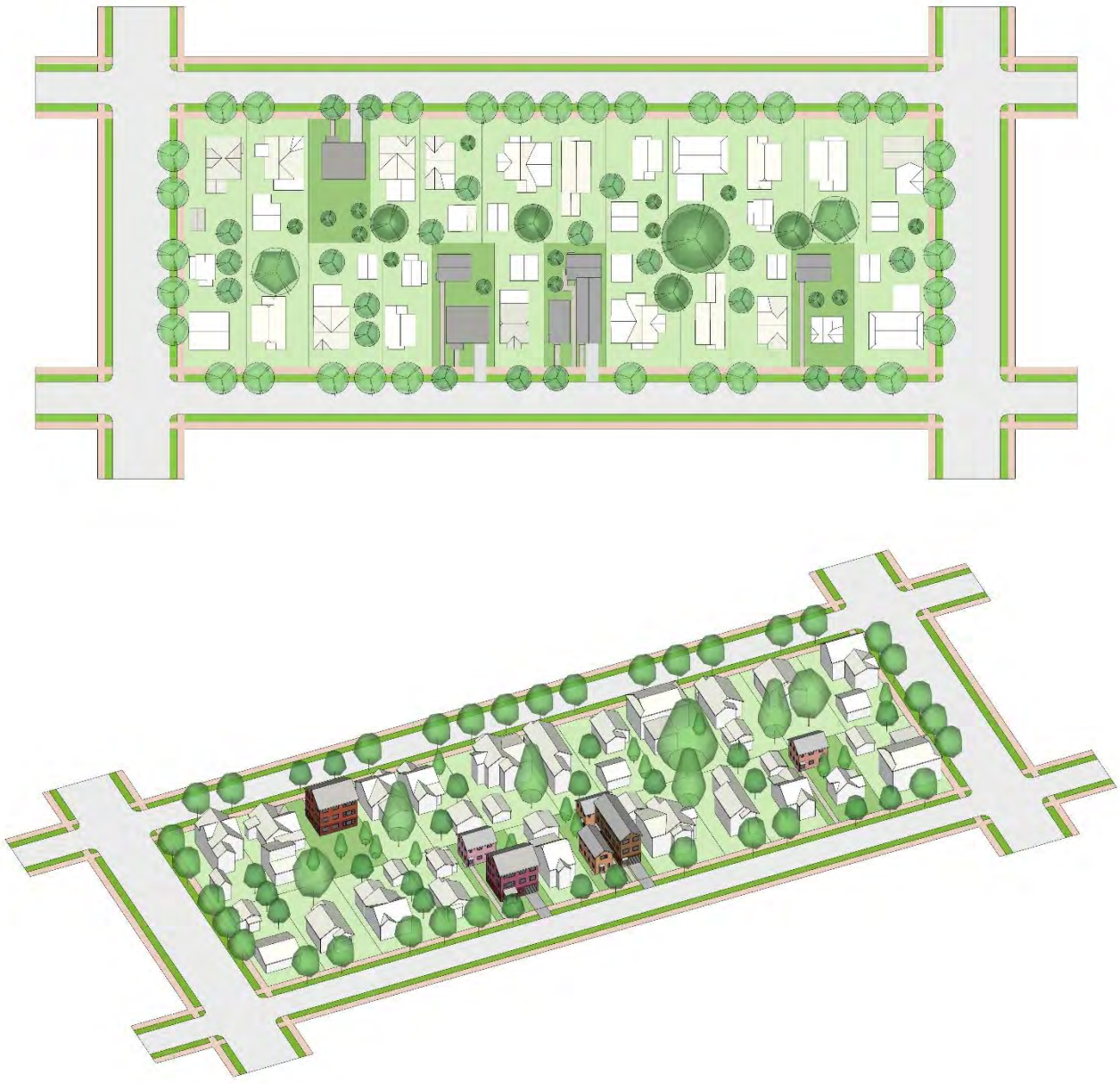
Note: See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle, 2023; MAKERS, 2023.

Exhibit 3.6-80. Example Neighborhood Residential Block with an Alley Redevelopment—Alternative 1: No Action



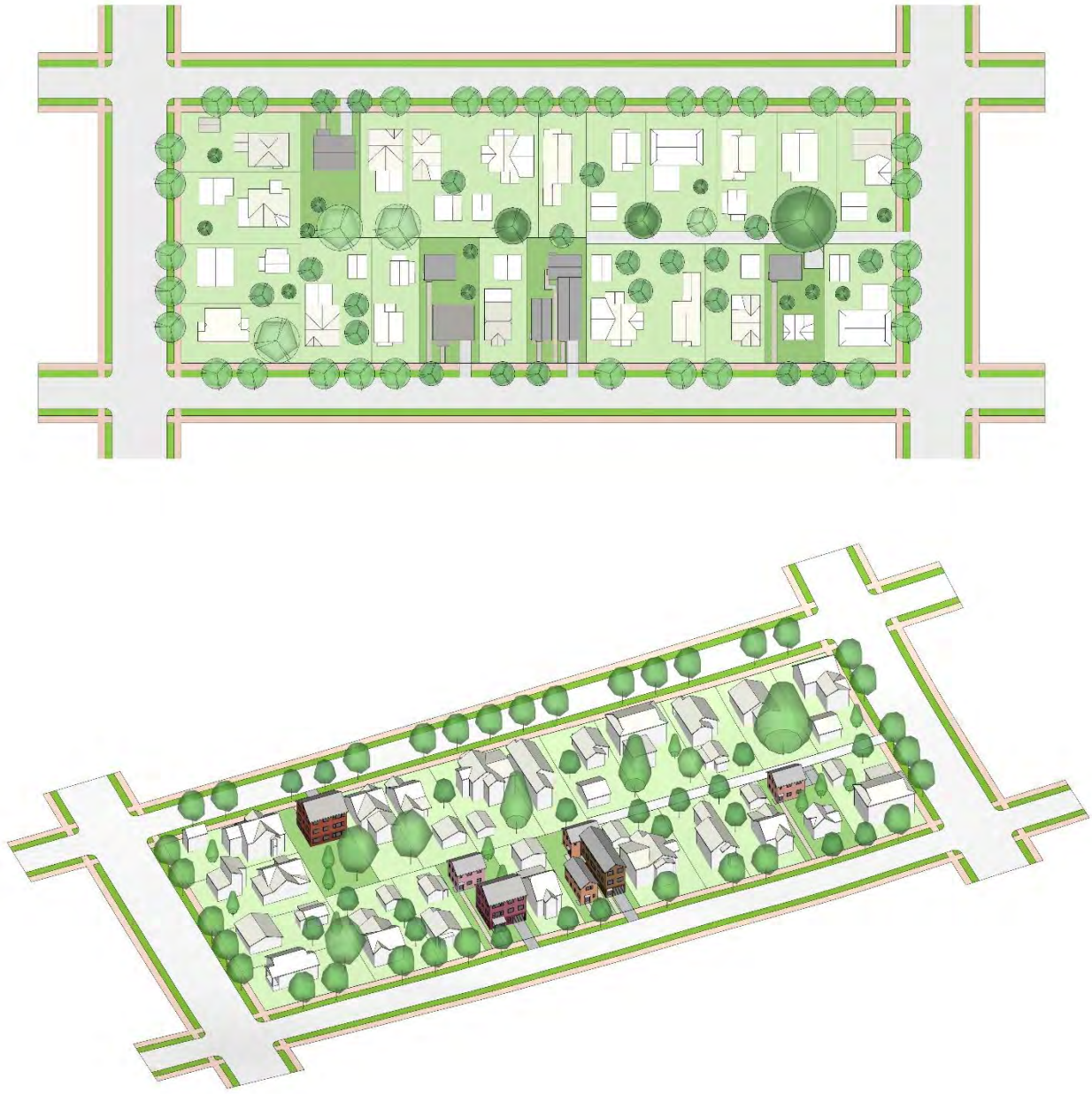
Note: This model illustrates potential redevelopment over the next 20 years under current Neighborhood Residential zoning. It is not intended to show the exact locations of development but that market-driven, incremental redevelopment over time would occur.
Source: City of Seattle, 2023; MAKERS, 2023.

Exhibit 3.6-81. Example Neighborhood Residential Block without an Alley Redevelopment—Alternative 1: No Action



Note: This model illustrates potential redevelopment over the next 20 years under current zoning. It is not intended to show the exact locations of development but that market-driven, incremental redevelopment over time would occur.
Source: City of Seattle, 2023; MAKERS, 2023.

Exhibit 3.6-82. Example Hilly Neighborhood Residential Block Redevelopment—Alternative 1: No Action



Note: This model illustrates potential redevelopment over the next 20 years under current zoning. It is not intended to show the exact locations of development but that market-driven, incremental redevelopment over time would occur.
Source: City of Seattle, 2023; MAKERS, 2023.

Transitions

Continued infill development in established centers and villages would likely create increasingly stark contrasts with surrounding lower-scale areas. In villages with existing RSL and low-rise transition zones, the effect may be less pronounced, but widespread development of townhouses and cottage clusters may show an abrupt shift as one crosses the urban village boundary. Development in centers and villages where parking is required would likely create more abrupt transitions to the low-density residential scale compared to areas where parking is not required.

Tree Canopy

No additional impacts to tree canopy are anticipated under Alternative 1 above those described under **Impacts Common to All Alternatives**.

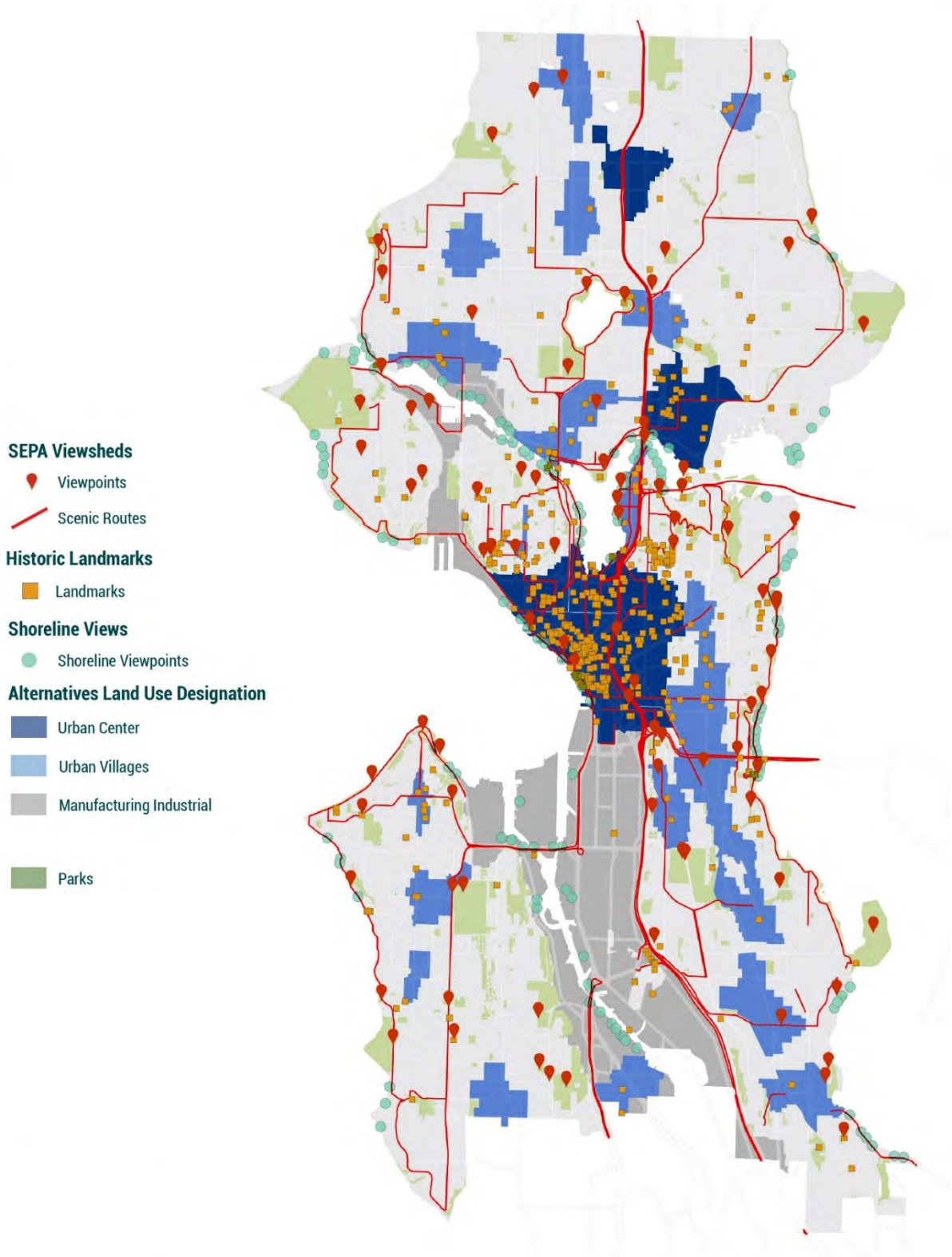
Shadows

Redevelopment in centers and villages would likely have taller heights than existing buildings, and thus cast longer shadows. Urban villages that sit on the north side of a hill, which could then cast shadows further, include northern Queen Anne, Admiral, and Othello. Nearly every center or village contains or is adjacent to parks, so redevelopment may cast longer shadows on parks. Also, urban villages with east-west-oriented main streets will see greater shadows on their central street and any associated public spaces. Most urban villages have north-south orientations, but a few have at least one central street running east-west, including Ballard (Market St) in Area 1, Wallingford (45th St) in Area 1, 23rd and Union-Jackson (Union St) in Area 5, Othello (Othello St and Graham St) in Area 8, and Rainier Beach (Henderson St) in Area 8.

Views

Future development under Alternative 1 would present limited disruptions to public views as growth would continue to concentrate in centers and villages, which tend to contain few viewpoints. Some exceptions include three viewpoints in Downtown that are not along the waterfront, one in Othello, two near West Seattle Junction, one at Ballard High School on the north side of Ballard, one in Bitter Lake, and Rainbow Point north of Green Lake-Roosevelt. See **Exhibit 3.6-83**.

Exhibit 3.6-83. Seattle Views Map—Alternative 1: No Action



Note: 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 the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle, 2023; MAKERS, 2023.

130th/145th Station Area

Land Use Patterns & Compatibility

Current Comprehensive Plan and zoning designations would be retained under the No Action Alternative in the 130th/145th Station Area. Zoning would continue to allow 3-story single-purpose residential development around the future light rail station at 130th and some 4- to 8-story multi-family uses near the 145th BRT station. Housing and job growth around both station areas would be modest and based on existing land use and zoning designations—194 housing units and 109 jobs would be added around NE 130th St and 646 housing units and 607 jobs would be added around 145th. Existing future land use and zoning designations in the station areas are mapped in **Exhibit 3.6-33** and **Exhibit 3.6-34**. Growth would increase activity unit density from 18.4 (existing) to 20.7 around NE 130th Street and from 35.3 (existing) to 64.9 around 15th and 145th. See **Exhibit 3.6-84**.

Exhibit 3.6-84. Station Area Share of Targets 2024-2044—Alternative 1

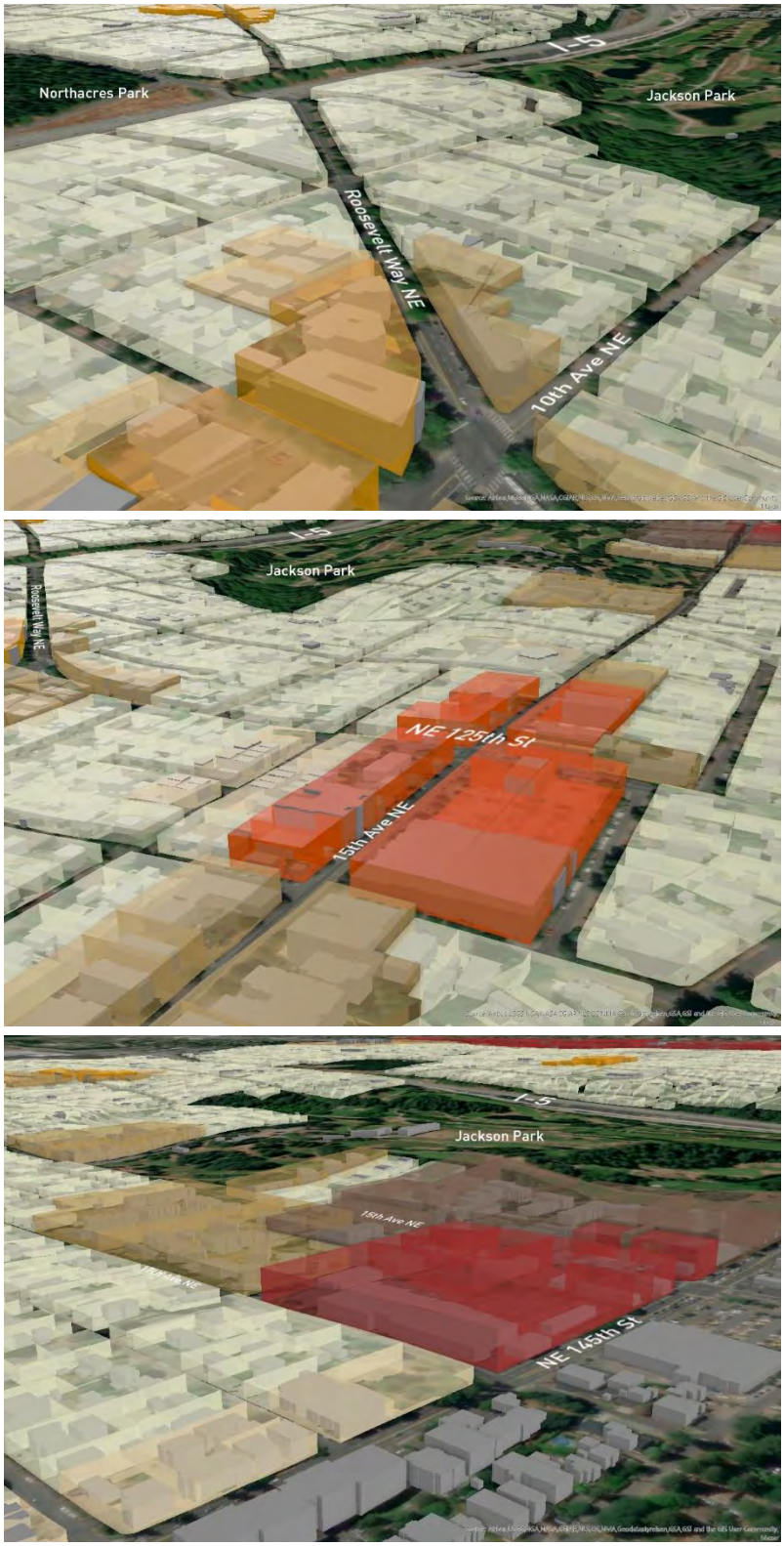
Location	New Housing Units*	New Jobs*	Existing AU/Ac.	Future AU/Ac.
NE 130th Street	194	109	18.4	20.7
15th & 145th	646	607	35.3	64.9

* The growth estimates consider the growth concept under the No Action Alternative within a common maximum boundary (Alternative 5).
Source: City of Seattle, 2023; BERK, 2023.

Urban Form

As seen in **Exhibit 3.6-79**, **Exhibit 3.6-85**, and **Exhibit 3.6-86**, the height around the 130th station would continue to be mostly 1- and 2-story buildings under Alternative 1, with the potential for some residential lots to see 3 stories. Under the existing zoning that offers limited capacity for development, few parcels would be likely to fully redevelop, though more may see additions (e.g., ADUs) and rebuilds. Though a light rail station would sit at the confluence of NE 130th St, Roosevelt Way NE, 5th Ave NE, and I-5, the station area would continue to feel like a low-density residential area and not like an active urban area. Few people would be within walking/biking/rolling distance of the station. Streets would not be activated with commercial uses, many streets would continue to lack sidewalks, and connectivity within the block bounded by 5th Ave NE, NE 130th St, 8th Ave NE, and Jackson Park would continue to be disjointed. In addition, 5th Ave NE would remain an uncelebrated public entry to a major transit investment (see **Exhibit 3.6-87)**. **Exhibit 3.6-85** and **Exhibit 3.6-86** illustrate potential redevelopment over 20 years; exact amount, locations, and design of redevelopment may vary. It would likely happen incrementally (i.e., site by site) as property owners choose to develop their property and/or aggregate properties for larger redevelopments.

Exhibit 3.6-85. 130th/145th Station Area Allowed Building Heights—Alternative 1: No Action



Note: This model illustrates allowed building heights under existing zoning. Building envelopes would also be influenced by FAR, setback, and upper story step back regulations.
Source: MAKERS, 2023.

Exhibit 3.6-86. 130th Station Area Massing Illustration—Alternative 1: No Action



Note: This model illustrates potential redevelopment over the next 20 years and building massings that maximize allowed FAR and heights while adhering to setback and zone transition regulations. Possible redevelopment is shown in pale yellow on an approximate amount of parcels likely to fully redevelop and is not intended to show exact locations of development but that market-driven, incremental redevelopment over time would occur. Additional modest changes (e.g., additions of ADUs, rehabilitation/remodels, and rebuilds) may occur under existing zoning.
Source: City of Seattle, 2023; MAKERS, 2023.

Exhibit 3.6-87. 5th Ave NE and 130th Station under Construction



Source: MAKERS, 2023.

Greater change would occur in the areas currently zoned for more intense development, including the 145th BRT station area and Pinehurst area. The 145th BRT station could incentivize further development in the area. The apartments southwest of the BRT station could redevelop from 3-story buildings to 5- to 8-story buildings. This area includes many established trees (see **Exhibit 3.6-88**). The east side of 15th Ave NE could redevelop with 75-foot tall buildings.

Exhibit 3.6-88. Existing 3-story Apartments Southwest of the 145th BRT Station

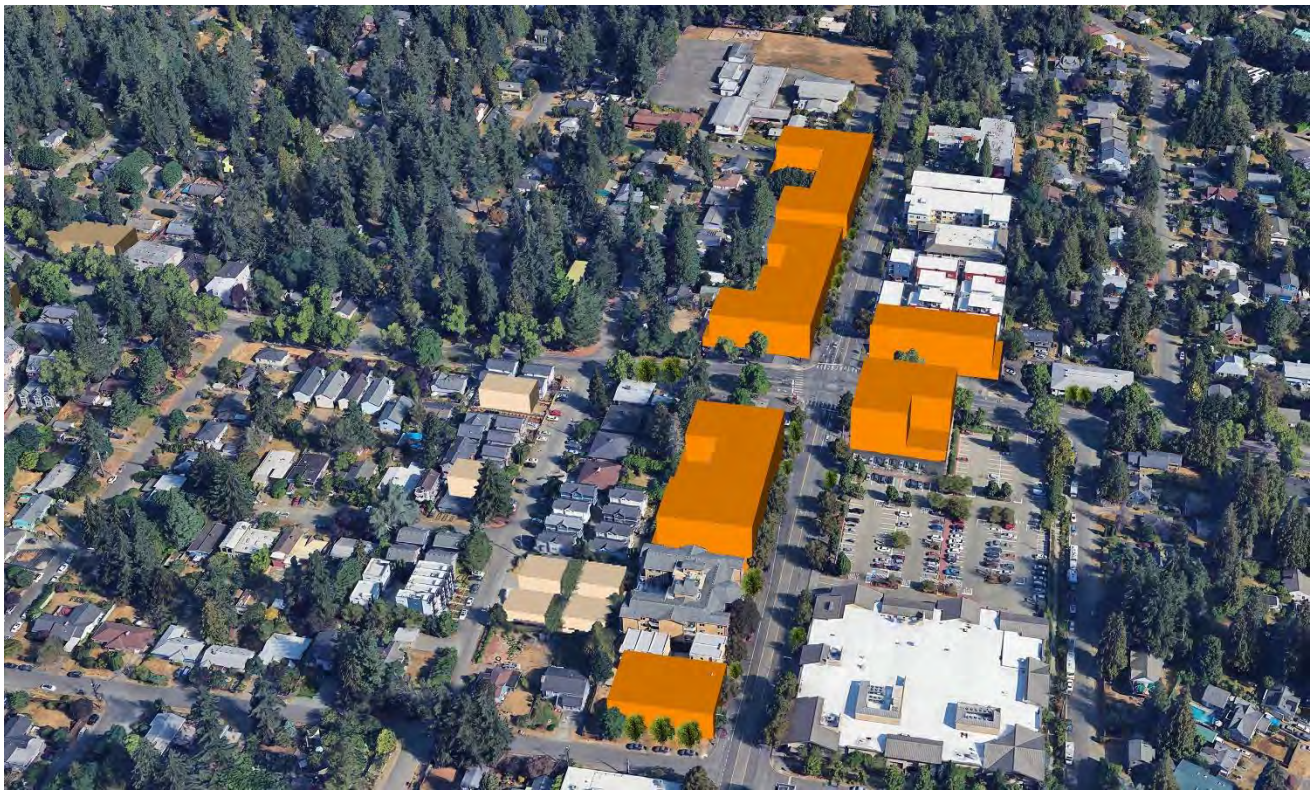


Source: MAKERS, 2023.

The Pinehurst area around 15th Avenue NE and NE 125th Street would continue to see similar development of 5-story mixed-use buildings in the NC3 zone along the main streets and 3- to 5-story residential buildings in the LR zones (**Exhibit 3.6-89**). With an urban center connector street designation on 15th Ave NE and NE 125th St, these streets would likely see street tree gaps filled with redevelopment, although trees may be in small landscape strips or grates with more space given to bus and pedestrian furniture, a protected bike lane, and street parking (if

remaining). Smaller streets off of the main arterials would meet Neighborhood Yield Streets standards, likely adding consistent landscape strips (6-8 feet wide) and street trees.

Exhibit 3.6-89. Pinehurst Massing Illustration—Alternative 1: No Action



Note: This model illustrates potential redevelopment over the next 20 years and building massings that maximize allowed FAR and heights while adhering to setback and zone transition regulations. Possible NC redevelopment is shown in orange and LR redevelopment in beige. It is not intended to show exact locations of development but that market-driven, incremental redevelopment over time would occur.
Source: City of Seattle, 2023; MAKERS, 2023.

Equity & Climate Vulnerability Considerations

Housing Type Variety and Choice

The housing type variety and housing choice under Alternative 1 would be similar to the existing pattern described under Citywide Affected Environment and **Impacts Common to All Alternatives**. Although there would continue to be new housing built over the next 20 years, the mix of housing types under Alternative 1 would likely continue to struggle serving a broad range of households.

Relationship to Active Transportation

Alternative 1's increase in density around transit and amenities would continue to support opportunities for active transportation as described in **Impacts Common to All Alternatives**.

Relationship to Social Wellbeing & Sociability

No additional impacts to social wellbeing and sociability are anticipated under Alternative 1 above those described under **Impacts Common to All Alternatives**. The focus on higher densities in select places could result in more high-rise buildings (as opposed to a greater variety of building types in Alternative 3, 4, and 5) to meet housing needs. This could result in small areas of apartments with small, less expensive units surrounded by large areas with high-cost detached homes. This division could limit social wellbeing and sociability. At the same time, these higher densities close to transit and amenities increase opportunities for active living, which in turn increases chances for sociability and wellbeing.

Climate Change

No additional impacts to climate change are anticipated under Alternative 1 above those described under **Impacts Common to All Alternatives**. Growth under the No Action Alternative would be concentrated in existing centers and villages away from most hazards. The No Action Alternative would not include the new Environment and Climate Element with mitigation and adaptation strategies or policies regarding tree canopy protection or enhancement and critical area regulations.

Impacts of Alternative 2: Focused

Land Use Patterns & Compatibility

Alternative 2 would designate additional areas of focused growth called neighborhood centers to create more housing around shops and services (see **Exhibit 2.4-10**). Neighborhood centers would be similar to urban centers in that they would allow a wide range of housing types and commercial uses with more compact building forms, but with a smaller geographic size and lower intensity of allowed development. About 3,000 acres currently in neighborhood residential zoning would be designated as neighborhood centers.

Alternative 2 studies total housing growth of 100,000 housing units (20,000 more than the No Action Alternative) to account for potential additional housing demand that could be met within the neighborhood centers. As described under **Impacts Common to All Alternatives**, most new growth would be focused within the regional and urban centers currently characterized by higher densities and a more diverse mix of uses than other areas of the city. Housing growth within the regional and urban centers would be the same as the No Action Alternative. Activity levels and activity units per acre would be similar to those described under the No Action Alternative, although future activity units per acre would be marginally lower under Alternative 2 as a result of the slight jobs shift to neighborhood centers (see **Exhibit 3.6-90**). Land use patterns and potential compatibility impacts within the regional and urban centers and at their periphery (where more intense development could occur adjacent to low-intensity uses outside the center) would be similar to those described under **Impacts Common to All Alternatives**. Compared to the No Action Alternative, adverse compatibility impacts at the periphery of regional and urban centers

could be lessened where a new neighborhood center with moderate-scale development abuts an existing center designation (see also the **Transitions** section below).

Under Alternative 2, the new neighborhood centers would accommodate the second highest share of anticipated housing growth behind regional centers (see **Chapter 2**). About half (49%) of housing growth in neighborhood centers would be directed into neighborhood centers with low displacement risk in areas 1 and 2. Area 4 would still receive the greatest overall share of new housing growth (19%) followed by Area 1 and Area 2 (about 18% each). A small number of jobs and commercial space would also shift from the larger centers towards the new neighborhood centers to reflect local demand consistent with the distribution of new housing. All neighborhood centers already contain areas zoned for commercial or mixed-use development. Additional jobs and commercial space in these areas, however, could increase more quickly due to the local demand from new housing.

Over time, overall land use patterns within the neighborhood centers would become more dense and mixed use. This could result in localized land use compatibility impacts within the neighborhood centers or with adjacent urban neighborhood areas where newer development is of greater height and intensity than existing development (see also the **Urban Form** section below). Such impacts would be mitigated through application of the City's existing development regulations and design review process. The SMP would also continue to apply where new neighborhood centers overlap the shoreline jurisdiction (e.g., north of Green Lake in Area 1, on Alki in Area 6, and on Lake Washington in Area 5).

Exhibit 3.6-90. Future Activity Units (AU)—Alternative 2

Center	Existing AU/Ac.	Alt. 1 AU/Ac.	Alt. 2 Acres	Alt. 2 AU	Alt. 2 AU/Ac.
Regional Centers[1]					
Downtown	377.4	473.2	952	448,614	471.2
First Hill/Capitol Hill	139.5	163.4	916	149,645	163.3
University Community	54.5	70.2	753	52,773	70.0
South Lake Union	236.7	344.1	340	116,153	341.8
Uptown	131.3	161.3	333	53,695	161.1
Northgate	57.3	75.1	412	30,860	74.9
Hub Urban Centers[1]					
Ballard	67.7	96.9	495	47,906	96.7
Bitter Lake Village	44.0	55.4	364	20,086	55.2
Fremont	71.9	88.1	214	18,883	88.0
Lake City	57.6	75.4	142	10,700	75.2
Mt Baker	36.0	47.4	491	23,196	47.2
West Seattle Junction	70.4	100.2	269	26,927	100.0
Residential Urban Centers[1]					
23rd & Union-Jackson	38.9	46.5	625	29,059	46.5
Admiral	49.2	60.4	98	5,935	60.3
Aurora-Licton Springs	44.1	51.4	327	16,784	51.3

Center	Existing AU/Ac.	Alt. 1 AU/Ac.	Alt. 2 Acres	Alt. 2 AU	Alt. 2 AU/Ac.
Columbia City	33.9	46.1	335	15,411	46.0
Crown Hill	25.3	31.4	271	8,499	31.4
Eastlake	70.2	82.0	199	16,329	82.0
Green Lake	70.6	87.4	109	9,495	87.3
Greenwood-Phinney Ridge	84.5	101.6	94	9,548	101.4
Madison-Miller	65.3	85.1	145	12,357	85.0
Morgan Junction	34.1	41.6	113	4,706	41.5
North Beacon Hill	28.1	34.5	267	9,175	34.4
Othello	23.7	29.0	499	14,503	29.1
Rainier Beach	23.0	26.0	346	9,007	26.0
Roosevelt	61.4	81.2	170	13,808	81.2
South Park	14.7	18.5	263	4,847	18.4
Upper Queen Anne	89.5	110.5	53	5,806	110.3
Wallingford	42.2	51.5	258	13,258	51.4
Westwood-Highland Park	27.9	32.6	275	8,948	32.5

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 the other a~~A~~lternatives ~~2-5~~.
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 hub and residential urban ~~villages~~ centers 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.

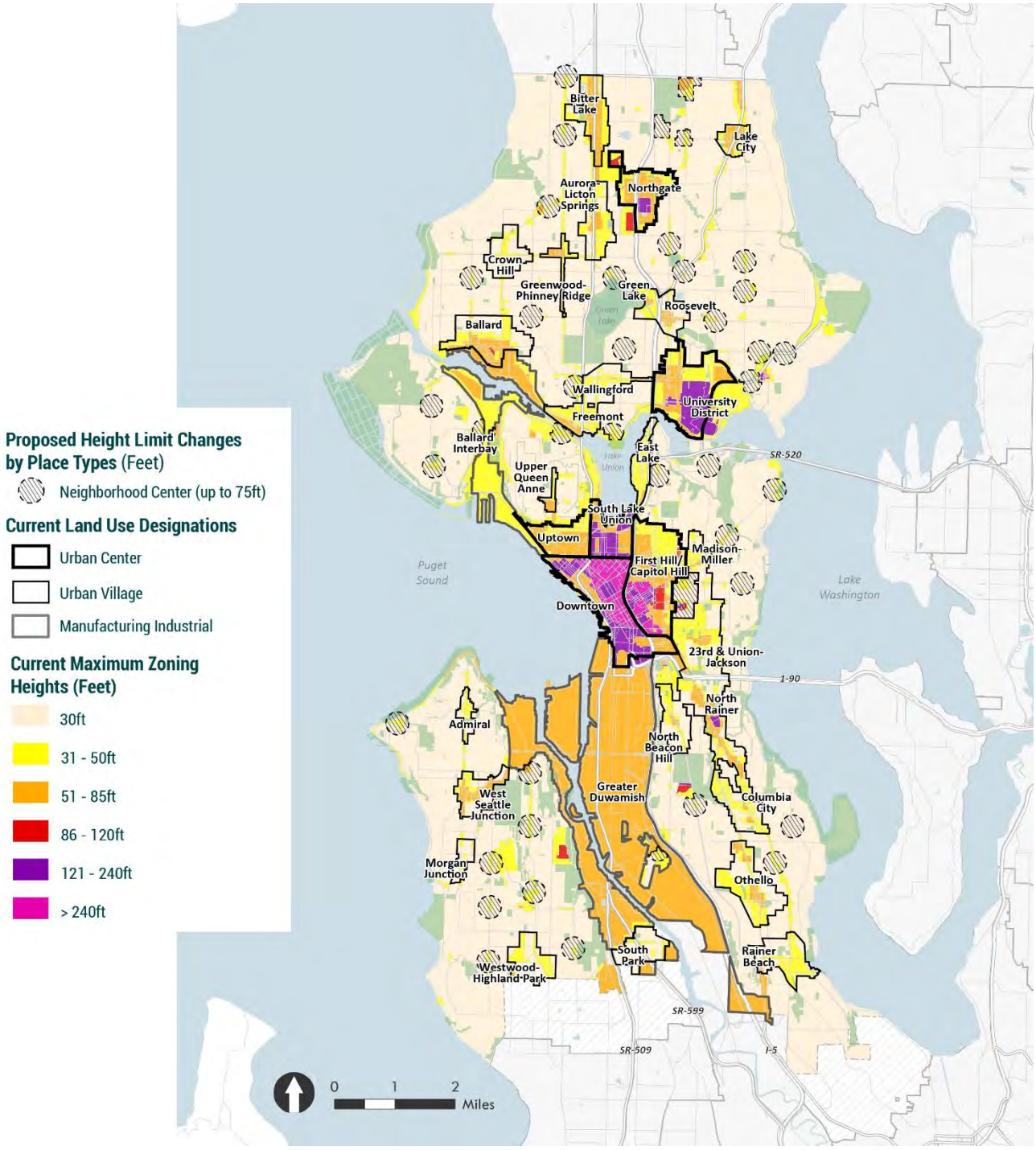
Urban Form

Height, Bulk, & Scale

Neighborhood centers could contain a mix of residential and mixed-use development from townhouses to 7-story apartments and mixed-use buildings. See **Exhibit 3.6-91**. Over time, overall building height and bulk in the new neighborhood center areas would likely increase with new development. Areas that are currently primarily 1- and 2-story buildings would be allowed to develop up to 5- to 8-story buildings. Localized impacts could occur as the areas transition to a more intense development pattern, with this conflict most likely being more pronounced in areas where neighborhood centers are being added.

Alternative 2 could also result in height, bulk, and scale impacts between properties in neighborhood centers where areas that are predominately 1- and 2-story detached houses might experience gradual redevelopment with multifamily homes as tall as 7 stories. Differences in massing on adjacent properties are not likely to be significantly more intense than those already occurring in many regional and urban centers but would occur in new areas.

Exhibit 3.6-91. Proposed Height Limit Changes—Alternative 2



Note: 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 the other a~~Alternatives 2–5~~.
Source: City of Seattle, 2023; MAKERS, 2023.

Transitions

Alternative 2 introduces a new kind of infill area: neighborhood centers. These will bring some moderate-scale development at neighborhood locations where it is not currently allowed, reducing the existing contrast between regional and urban centers (that see widespread development of large buildings) and surrounding areas (with broad areas that see minimal development). Designating neighborhood centers could create new contrasts in building heights and intensity with surrounding areas in the places where they are applied.

Tree Canopy

Increased development pressure in previously low-density residential zones may displace trees on private property faster, while adding street trees.

Shadows

In neighborhood centers, the increase in height limits from 30 feet to 75 feet would mean that existing single-story buildings could be replaced with taller and wider buildings. These would cast longer shadows over a greater portion of the day. As noted in the **Affected Environment**, building shadows can be considered positive for climate adaptation to reduce summertime heat, but can be negative for human health and wellbeing (especially during winter) and the health of existing trees if accustomed to full sun.

Shadows on Public Parks

Neighborhood center upzones that increase height limits above 30 feet that could result in increased shadows on public parks including:

- NE 145th and 15th Ave NE on Jackson Park
- 130th Station Area on Jackson Park
- Holman Rd NW and 3rd Ave NW on Carkeek Park
- 15th Ave NE and Lake City Way on Maple Leaf Reservoir Park
- Sand Point Way and 50th Ave NE on Burke-Gilman Trail and Playground Park
- NE 45th St/Sand Point Way and 36th Ave NE on Burke-Gilman Trail
- Tangletown on Keystone Place
- Lawton Park on Discovery Park
- Magnolia on Magnolia Playfield
- Madison Park on Madison Park and Madison Park Beach
- Washington Park/Broadmoor on Broadmoor Golf Club
- Madrona on Madrona Playground and Alvin Larkins Park
- Alki on Alki Beach Park
- North Delridge on Dragonfly Garden and Pavilion

- Delridge Way SW and SW Brandon St on Cottage Grove Park, Delridge P-Patch Community Gardens, and Greg Davis Park
- Delridge Way SW and Sylvan Way SW on Delridge and Myrtle
- 9th Ave SW and SW Henderson St on Highland Park Playground and Westcrest Park
- Beacon Ave S and S Columbian Way on Jefferson Park Golf Course

Shadows on the Delridge P-Patch are important to note because of their potential impact to plant productivity.

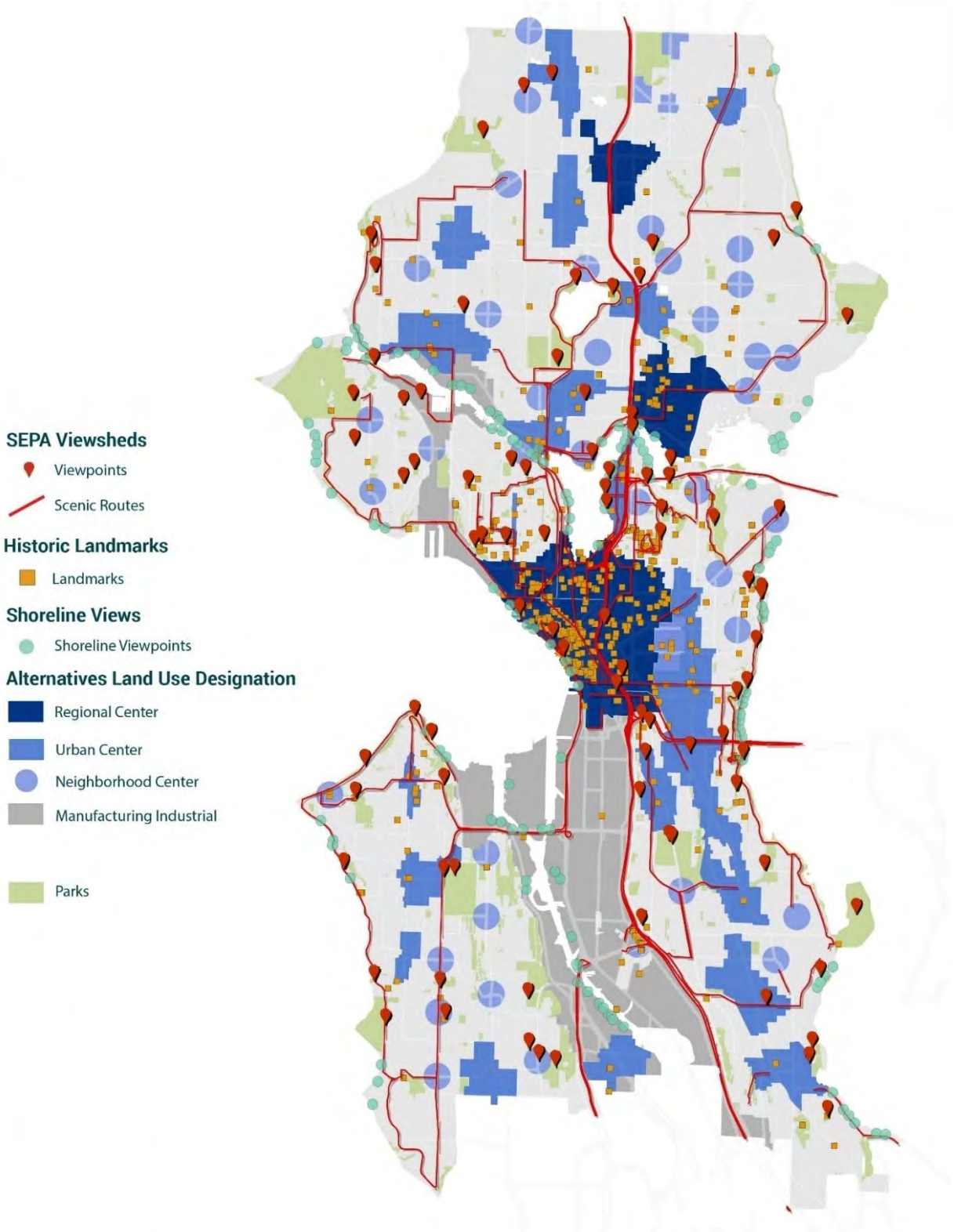
Shadows on Public Rights-of-Way

Impacts would be greatest along east-west-oriented neighborhood main streets with taller developments on the south side, though they would impact any orientation to varying degrees. See **Exhibit 3.6-74**, **Exhibit 3.6-75**, and **Exhibit 3.6-76** for shadow patterns at various times and seasons with different building heights. Many neighborhood main streets have 1-story existing buildings, so the increase to 3- or 5-stories would have noticeable impacts on shadows to the sidewalks. Street trees accustomed to full sun, especially if shorter than new buildings, may be impacted. Selection of future street trees and vegetation would need to consider future solar impacts.

Views

The expected development pattern in neighborhood centers is unlikely to significantly impact protected views beyond the potential impacts of the No Action Alternative. Most public viewpoints, including shorelines and landmarks, are not located within the neighborhood centers, and no zoning changes are proposed between most viewpoints and the landmark view. See **Exhibit 3.6-92**.

Exhibit 3.6-92. Seattle Views Map—Alternative 2



Note: 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 the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle, 2023; MAKERS, 2023.

130th/145th Station Area

Land Use Patterns & Compatibility

Under Alternative 2, there would be three neighborhood centers designated in the station area near 130th Street and Roosevelt Way to the east of I-5, 125th Street and 15th Ave (Pinehurst), and 145th Street and 15th Ave. Zoning to implement the centers would include a combination of Low-rise Residential, Midrise Residential, and Neighborhood Commercial (NC3). Future development would be more mixed use near the 145th Station Area (with NC3) compared to the No Action Alternative and heights would be greater at up to 7 stories, particularly along the 145th Station Area.

Both stations areas would see more growth clustered in the newly designated neighborhood centers under Alternative 2 compared to the No Action Alternative. However, housing and job growth would be relatively modest—1,049 housing units and 284 jobs would be added around 130th Street and 1,159 housing units and 695 jobs would be added around 145th Street. Growth would increase activity unit density from 18.6 (existing) to 29.9 around NE 130th Street and from 35.7 (existing) to 83.3 around 15th and 145th. Land use patterns and compatibility impacts would be similar to those described above within other neighborhood centers.

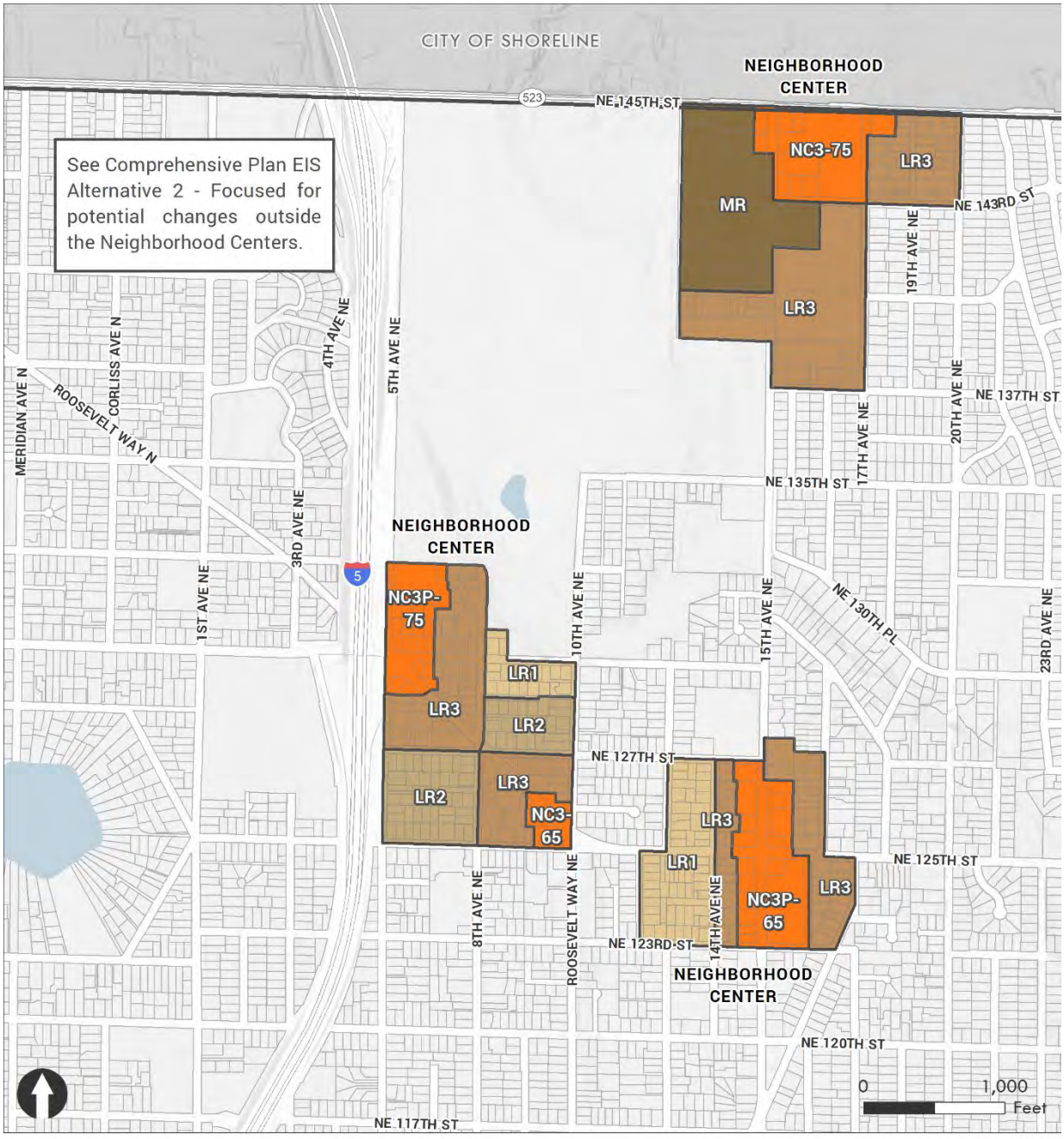
See **Exhibit 3.6-93** and **Exhibit 3.6-94**.

Exhibit 3.6-93. Station Area Share of Targets 2024-2044—Alternative 2

Location	Place Type*	New Place Acres**	New Housing Units**	New Jobs**	Existing AU/Ac.	Future AU/Ac.
NE 130th Street	Neighborhood Center	52	1,049	284	18.4	29.6
15th & 145th	Neighborhood Center	65	1,159	695	35.3	82.4

* 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 the other a~~A~~lternatives ~~2-5~~.
** New place acres are the total acres within the neighborhood center boundary under Alternative 2. The growth estimates consider the proposed growth concept under Alternative 2 within a common maximum boundary (Alternative 5). The 130th Street and Pinehurst Neighborhood Centers in Alternative 2 are both part of the 130th Street Urban Center in Alternative 5 and so are listed under NE 130th Street in this table.
Source: City of Seattle, 2023; BERK, 2023.

Exhibit 3.6-94. 130th/145th Station Area Zoning Concept—Alternative 2



Note: 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 the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle, 2022; BERK, 2022.

Urban Form

Height, bulk, and scale. The station areas could see extensive changes to height, bulk, and scale as a result of proposed zoning capacity increases combined with proximity to the new light rail station. Building heights immediately next to the 130th light rail station would likely redevelop from primarily 1- and 2-story buildings up to 7 stories. The heights of buildings surrounding the 130th station would develop into a mix of 3-story townhomes and 4- and 5-story buildings. **Exhibit 3.6-95** and **Exhibit 3.6-96** illustrate potential redevelopment over 20 years; exact amount, locations, and design of redevelopment may vary. It would likely happen incrementally (i.e., site by site) as property owners choose to develop their property and/or aggregate properties for larger redevelopments.

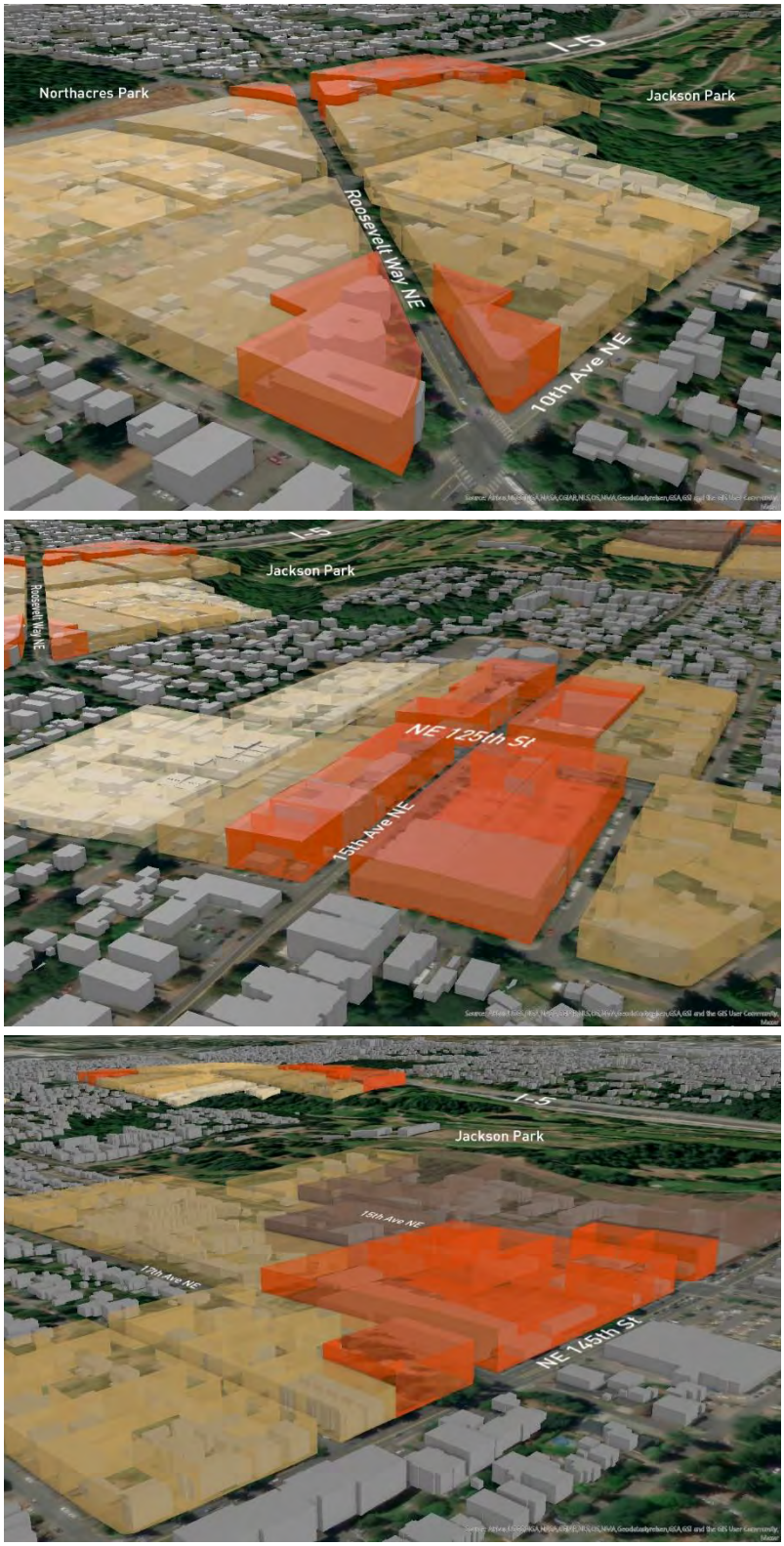
The core of the 145th station area would likely redevelop into a mixed-use node with buildings up to 7 stories, while heights in the surrounding area would be similar to the No Action Alternative. Zoning around Pinehurst would allow for more multi-family than the No Action Alternative but new development would likely continue to see a mix of 3- to 5-story buildings.

Specific impacts include:

- **Urban design and active transportation: Intersite connectivity.** The block bounded by 5th Ave NE, NE 130th St, 8th Ave NE, and Jackson Park is approximately 660 feet by 690 feet and currently has no through access; NE 131st Place is a private access drive and 8th Ct NE is a short dead-end right-of-way. With redevelopment, the lack of an existing finer-grained and connected network of streets means that redevelopment, without requirements for greater connectivity, could result in development that is fractured and doesn't have great connections to existing streets and the light rail station.
- **Street-level community building: Lack of focused public realm.** Similarly, because of the limited street grid, piecemeal redevelopment could result in individual, unrelated, disconnected developments lacking a cohesive orientation toward public streets, a focused public realm, or opportunities for shared social gathering. Building entries could be hidden or facing different directions within a block accessed by long, private driveways.
- **Street level community building: Affordable commercial space.** 15th Ave NE, both in the 145th station area and Pinehurst, as well as NE 125th St at 15th Ave NE and Roosevelt Way NE south of NE 125th St, would likely see greater levels of activity, enlivening the street level experience. However, many small commercial spaces currently exist in strip malls or in adapted houses in these areas. With redevelopment, maintaining affordable commercial space in the area for local and BIPOC-owned businesses may be challenging, impacting the social and cultural ties to these neighborhood centers.

Transitions. Development of high-intensity buildings in the immediate vicinity of the 130th station area under Alternative 2 may create abrupt local transitions in scale between existing detached houses and new larger construction. Over time, an evolution of the station area into more consistently intensely used land, combined with smaller scale redevelopment in surrounding low-rise zones would likely soften these transitions. See **Exhibit 3.6-96** and **Exhibit 3.6-97**.

Exhibit 3.6-95. Proposed 130th/145th Station Area Allowed Building Heights—Alternative 2



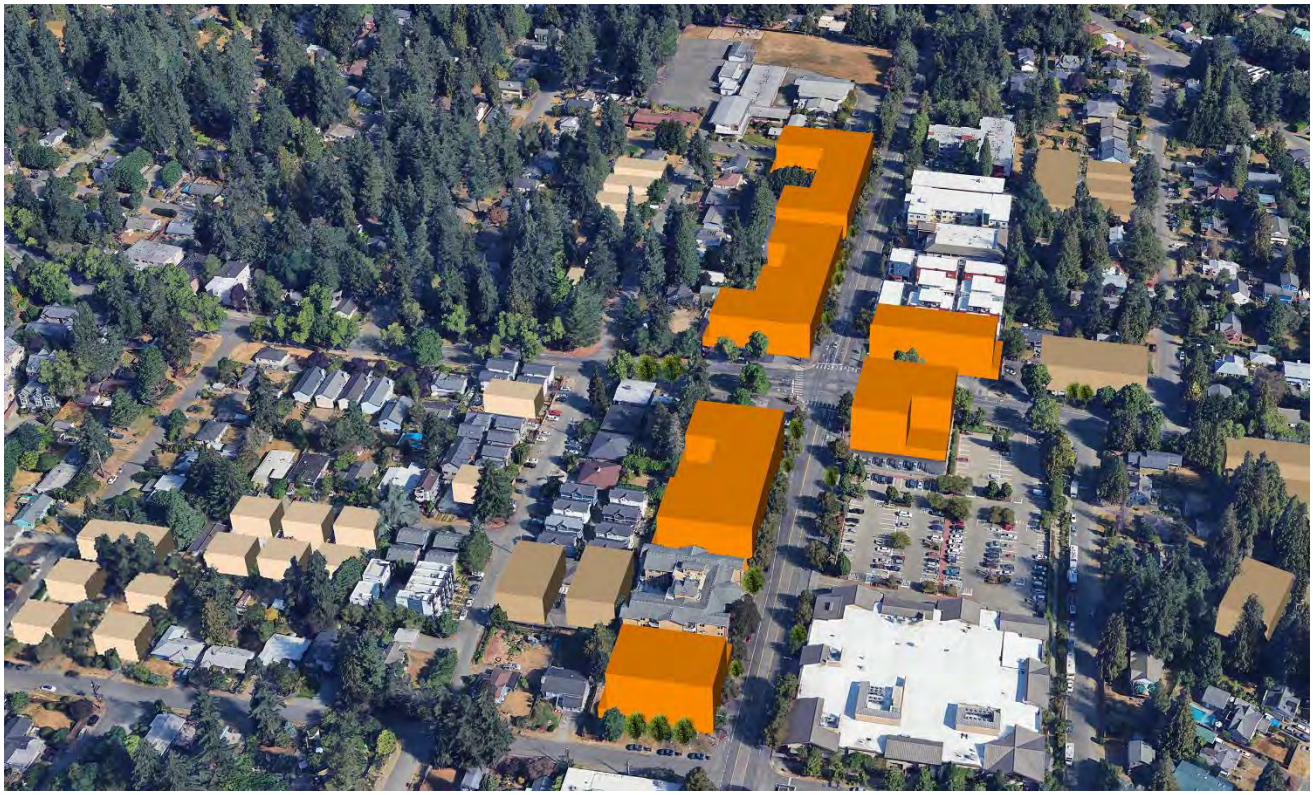
Note: This model illustrates proposed building height limits in proposed neighborhood centers. Building envelopes would also be influenced by FAR, setback, and upper story step back regulations.
Source: City of Seattle, 2023; MAKERS, 2023.

Exhibit 3.6-96. 130th Station Area Massing Illustration—Alternative 2



Note: This model illustrates potential redevelopment over the next 20 years and building massings that maximize allowed FAR and heights while adhering to setback and zone transition regulations. Possible NC redevelopment is shown in orange and LR redevelopment in beige. It is not intended to show exact locations of development but that market-driven, incremental redevelopment over time would occur.
Source: City of Seattle, 2023; MAKERS, 2023.

Exhibit 3.6-97. Pinehurst Massing Illustration—Alternative 2



Note: This model illustrates potential redevelopment over the next 20 years and building massings that maximize allowed FAR and heights while adhering to setback and zone transition regulations. Possible NC redevelopment is shown in orange and LR redevelopment in beige. It is not intended to show exact locations of development but that market-driven, incremental redevelopment over time would occur.
Source: City of Seattle, 2023; MAKERS, 2023.

Tree Canopy. Similar to the No Action Alternative, any redevelopment would fill gaps in street trees along the frontage. In the station areas, large-scale redevelopment would significantly impact the existing tree canopy. Alternatively, if trees are protected "exceptional" trees, development capacity would be constrained.

Shadows on Public Parks. Increased height limits above 30 feet in the NE 145th and 15th Ave NE and 130th Station Area neighborhood centers could result in increased shadows on Jackson Park. However, the human experience of the park would not significantly change as tall evergreens already shade the park boundaries.

Views. The I-5 scenic corridor traverses the 130th Station Area. However, I-5 in this area is below grade and/or has noise barrier walls blocking much of the view. In addition, the light rail infrastructure (above ground) is visually prominent and blocks or impacts much of the eastward views. More buildings would be visible, especially on the east side of I-5 at NE 130th St/Roosevelt Way NE, but they would be a minor part of the view.

Equity & Climate Vulnerability Considerations

Housing Type Variety and Choice

The housing type variety and housing choice under Alternative 2 would be similar to the existing pattern described under **Affected Environment** and **Impacts Common to All Alternatives**.

Relationship to Active Transportation

Alternative 2 would introduce neighborhood centers, which are similar to urban centers but are smaller geographically. The increase in housing types and commercial uses in a more compact urban form could increase the amount of people walking and rolling to their destinations, both in the neighborhood center and to those adjacent to it, helping mitigate climate change.

Relationship to Social Wellbeing & Sociability

Impacts would be similar to Alternative 1, but an increase in compact urban form of more housing and commercial uses could provide more spaces and locations where social interactions can happen than under Alternative 1. See also **Section 3.8 Population, Housing, & Employment** for a discussion of cultural displacement risk and its potential impact on wellbeing.

Climate Change

No additional impacts to climate change are anticipated under Alternative 2 above those described under **Impacts Common to All Alternatives**. Growth under Alternative 2 would be concentrated in existing centers and the new neighborhood centers away from most hazards. Like the other action alternatives, Alternative 2 would include a new Environment and Climate Element with mitigation and adaptation strategies as well as policies regarding tree canopy protection or enhancement and critical area regulations. See Alternative 2's **Tree Canopy** section for impacts related to trees, which would influence urban heat and potentially flooding.

Impacts of Alternative 3: Broad

Land Use Patterns & Compatibility

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**). This alternative studies total housing growth of 100,000 housing units (20,000 more than the No Action Alternative) to account for the potential additional housing demand that could be met with broad zoning changes. As described under **Impacts Common to All Alternatives**, most new growth would be focused within the regional and urban centers currently characterized by higher densities and a more diverse mix of uses than other areas of the city. Housing growth within the regional and urban centers would be the same as the No Action Alternative and Alternative 2. Activity levels and activity units per acre would be similar to those described under Alternative 2 as a result of the slight jobs shift to urban neighborhood areas (see **Exhibit 3.6-98**). Land use patterns and potential compatibility impacts within the regional and urban centers would be similar to those described under **Impacts Common to All Alternatives**. Compared to the No Action Alternative, adverse compatibility impacts at the periphery of most centers could be minimized as the abutting urban neighborhood areas redevelop with denser development patterns (see also the **Transitions** section below).

Under Alternative 3, urban neighborhood areas would accommodate the second highest share of anticipated housing growth behind regional centers (see **Chapter 2**). More than half (53%) of the additional new housing growth in urban neighborhood areas would be directed into areas 1 and 2. However, this growth would be more spread throughout the analysis areas rather than into the focused neighborhood center nodes of Alternative 2. Area 2 would receive the greatest overall share of new housing growth under Alternative 3 (20%), followed by Area 4 (19%) and Area 1 (18%). A small number of jobs and commercial space would shift from the larger centers towards urban neighborhood areas to reflect local demand consistent with the distribution of new housing. Alternative 3 also allows more flexibility for commercial space in these areas (such as allowing corner stores or making it easier to operate at-home businesses) to support the development of neighborhoods where more people can walk to everyday needs.

Over time, overall land use patterns would become denser within the urban neighborhood areas. Most of this development would continue to be residential in nature with limited additional local retail and commercial activity. This could result in localized land use compatibility impacts within the urban neighborhood areas where the height or intensity of new development exceeds existing development (although the maximum height allowed for market-rate development in these zones would remain 30 feet; see also the **Urban Form** section below). Additional flexibility for commercial spaces could also result in localized land use compatibility impacts where commercial uses result in noise, traffic, or other impact due to deliveries, customer traffic, outdoor cafes, or other activities associated with commercial use. Such impacts would be mitigated through application of the City's development regulations.

Exhibit 3.6-98. Future Activity Units (AU)—Alternative 3

Center[1]	Existing AU/Ac.	Alt. 1 AU/Ac.	Alt. 3 Acres	Alt. 3 AU	Alt. 3 AU/Ac.
Regional Centers[1]					
Downtown	377.4	473.2	952	448,614	471.2
First Hill/Capitol Hill	139.5	163.4	916	149,645	163.3
University Community	54.5	70.2	753	52,773	70.0
South Lake Union	236.7	344.1	340	116,153	341.8
Uptown	131.3	161.3	333	53,696	161.1
Northgate	57.3	75.1	412	30,860	74.9
Hub Urban Centers[1]					
Ballard	67.7	96.9	495	47,906	96.7
Bitter Lake Village	44.0	55.4	364	20,086	55.2
Fremont	71.9	88.1	214	18,883	88.0
Lake City	57.6	75.4	142	10,700	75.2
Mt Baker	36.0	47.4	491	23,196	47.2
West Seattle Junction	70.4	100.2	269	26,927	100.0
Residential Urban Centers[1]					
23rd & Union-Jackson	38.9	46.5	625	29,059	46.5
Admiral	49.2	60.4	98	5,935	60.3
Aurora-Licton Springs	44.1	51.4	327	16,784	51.3
Columbia City	33.9	46.1	335	15,411	46.0
Crown Hill	25.3	31.4	271	8,499	31.4
Eastlake	70.2	82.0	199	16,329	82.0
Green Lake	70.6	87.4	109	9,495	87.3
Greenwood-Phinney Ridge	84.5	101.6	94	9,546	101.3
Madison-Miller	65.3	85.1	145	12,357	85.0
Morgan Junction	34.1	41.6	113	4,706	41.5
North Beacon Hill	28.1	34.5	267	9,175	34.4
Othello	23.7	29.0	499	14,503	29.1
Rainier Beach	23.0	26.0	346	9,007	26.0
Roosevelt	61.4	81.2	170	13,808	81.2
South Park	14.7	18.5	263	4,847	18.4
Upper Queen Anne	89.5	110.5	53	5,806	110.3
Wallingford	42.2	51.5	258	13,258	51.4
Westwood-Highland Park	27.9	32.6	275	8,948	32.5

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 the other a~~A~~lternatives ~~2-5~~.
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 hub and residential urban ~~villages~~ centers 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.

Urban Form

Height, Bulk, & Scale

Alternative 3 would allow missing middle housing types such as duplexes, triplexes, fourplexes, sixplexes, and three-story stacked flats in urban neighborhood areas. Seattle is exploring various zoning concepts for middle housing including some focused more on detached and attached housing and others on stacked flats.

While additional housing typologies would be allowed compared to the No Action Alternative, the maximum height allowed for market-rate development in these zones would remain 3-stories for market-rate development. Slight increases in FAR could also allow for slightly bigger buildings and could encourage taller buildings if building taller makes it easier to maximize FAR. See **Exhibit 3.6-99**.

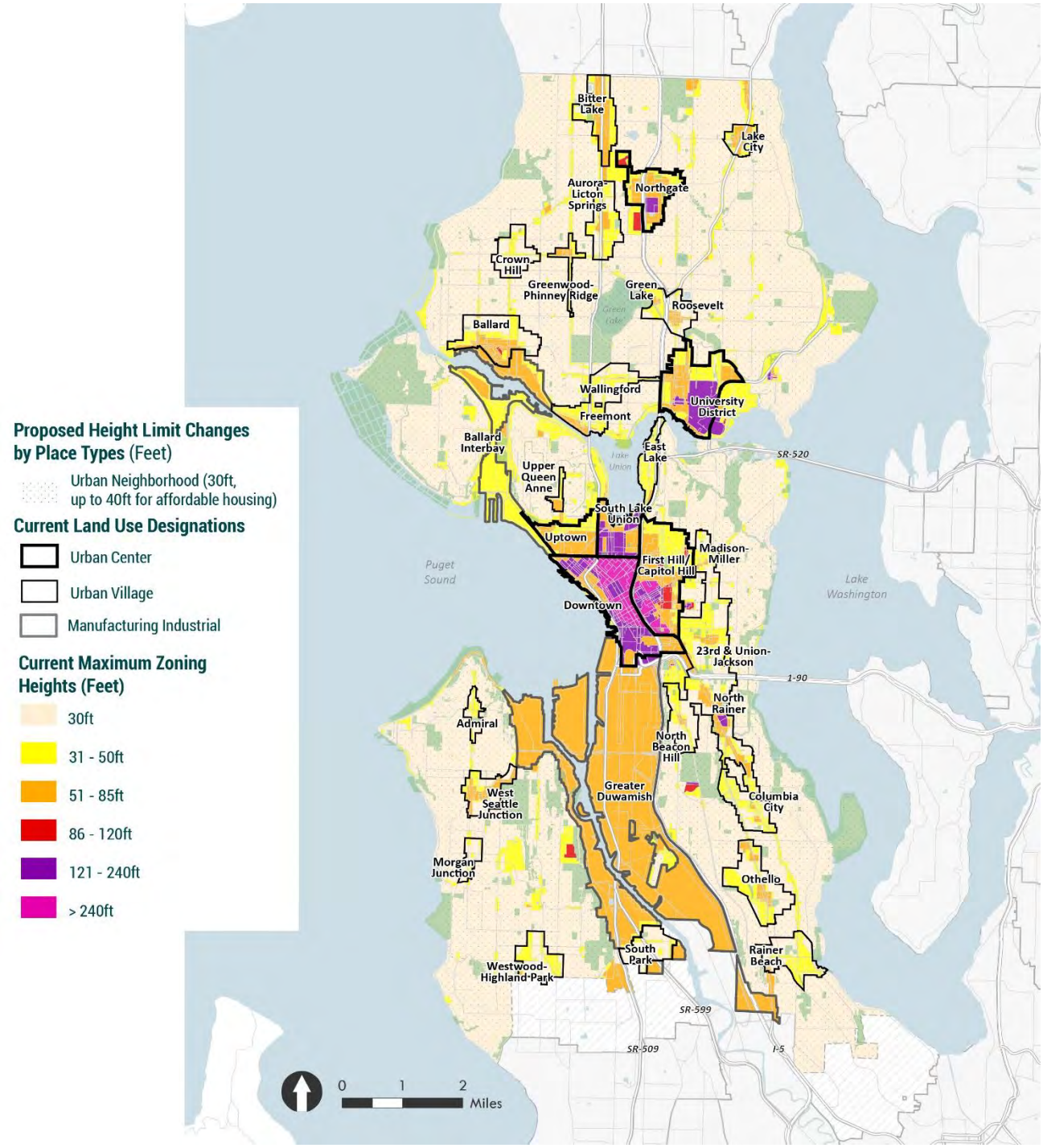
Height, bulk, and scale impacts between buildings on adjacent parcels would be minimal as market-rate development would continue to have a 3-story height limit. However, changes to allow additional housing types could encourage redevelopment in these areas and increase the number of 3-story buildings located next to existing 1- and 2-story buildings. See **Exhibit 3.6-99**.

Alternative 3 would also allow potential height, floor area, or density bonuses for affordable housing projects. This means that some redevelopment may be up to 4 stories, such as 4-story stacked flats.

Middle housing street-level experience. The broad allowances for middle housing proposed in Alternative 3 would change some aspects of how people currently experience neighborhoods, from the street-level/sidewalk experience to how neighbors interact within a development and the larger community. **Exhibit 3.6-100** to **Exhibit 3.6-105** illustrate the types of middle housing expected under a range of concepts. For any middle housing types that would replace existing houses, the increased allowances would likely result in more buildings closer to the street and taller than exist today, which could change the relationship of the building to the sidewalk. When an existing house is preserved and units are added behind it, less change would be experienced from the sidewalk.

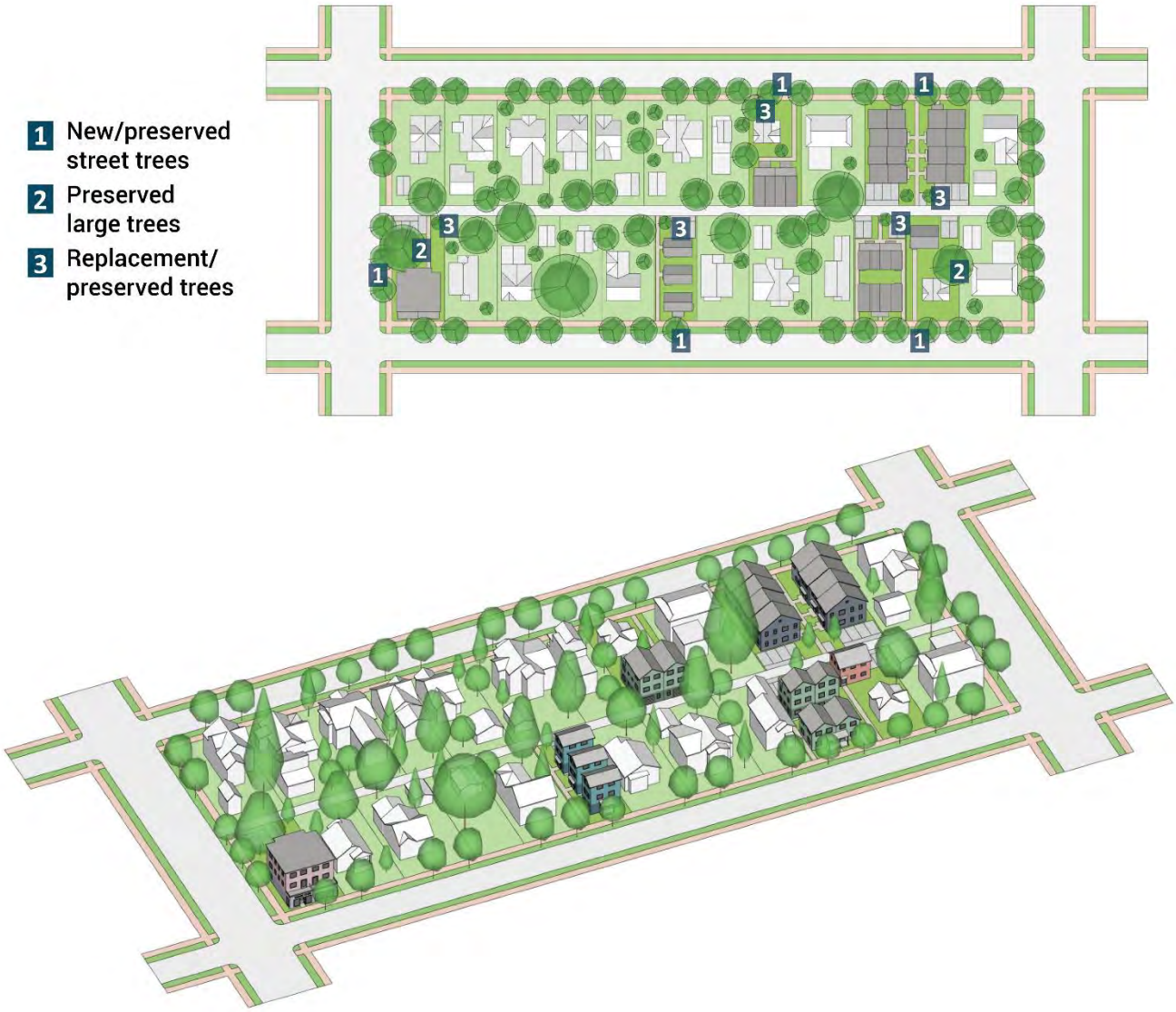
Building-to-street relationship. Existing front setbacks in urban neighborhood areas are generally about 20 feet from the front lot line. The updated Neighborhood Residential zones would require front setbacks of 10 feet. A 10- to 15-foot distance from the sidewalk improves chances for social interactions, providing adequate distance for people to feel comfortable using their front stoop and ground-level rooms facing the street. That distance also keeps upper-story windows and balconies close enough to the street for passive surveillance. Ground-related units with entries facing the street also increase the chances for social interaction at the sidewalk. However, for lots without alleys, an increase in driveways and garages facing the street would reduce these chances (as well as impact general aesthetics). Reduced parking requirements could improve this situation.

Exhibit 3.6-99. Proposed Height Limit Changes—Alternative 3



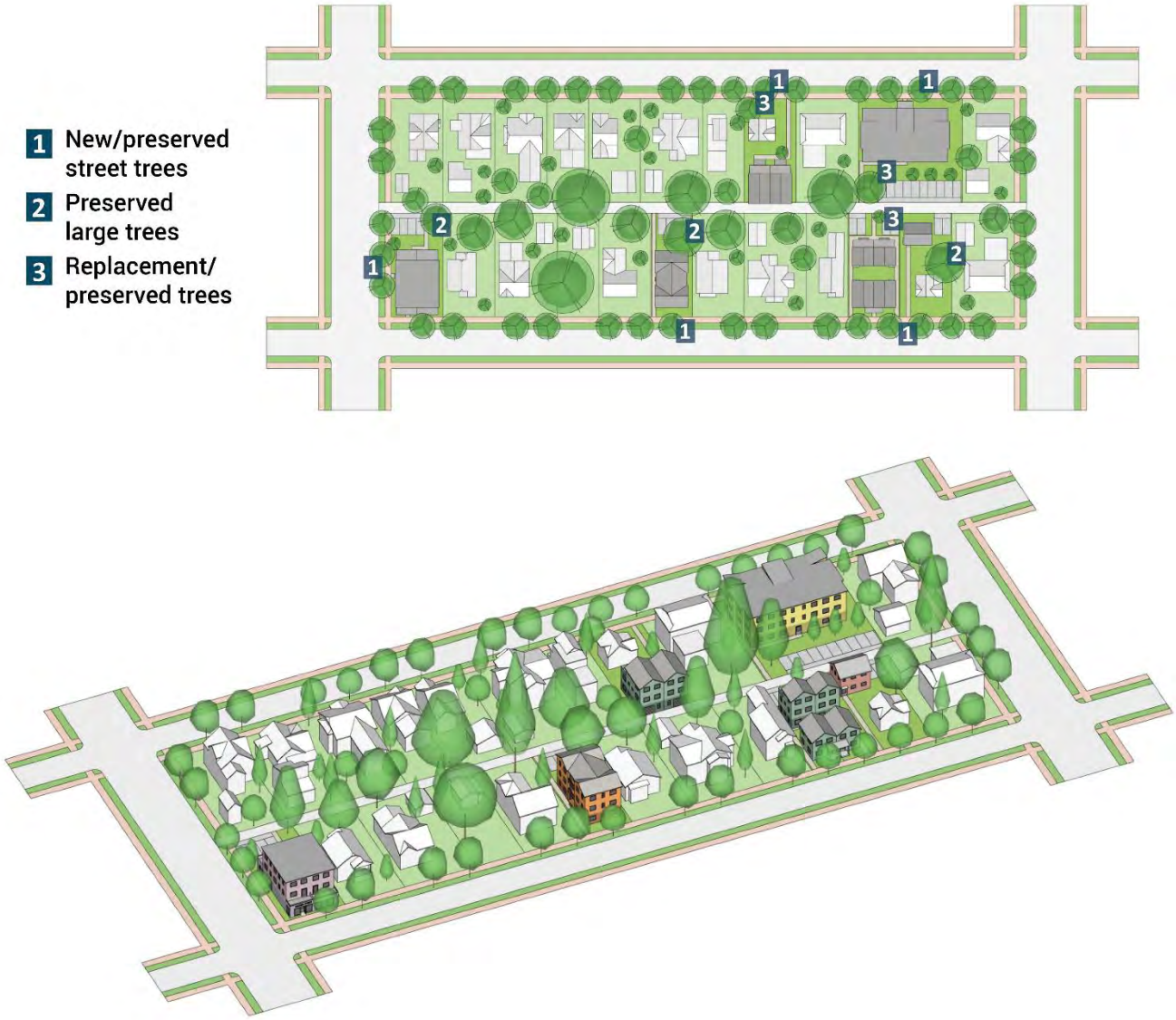
Note: See **Exhibit 2.1-1** in **Chapter 2** for a cross-walk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle, 2023; MAKERS, 2023.

Exhibit 3.6-100. Example Neighborhood Residential Block with an Alley Redevelopment—Detached/Attached Units Focus



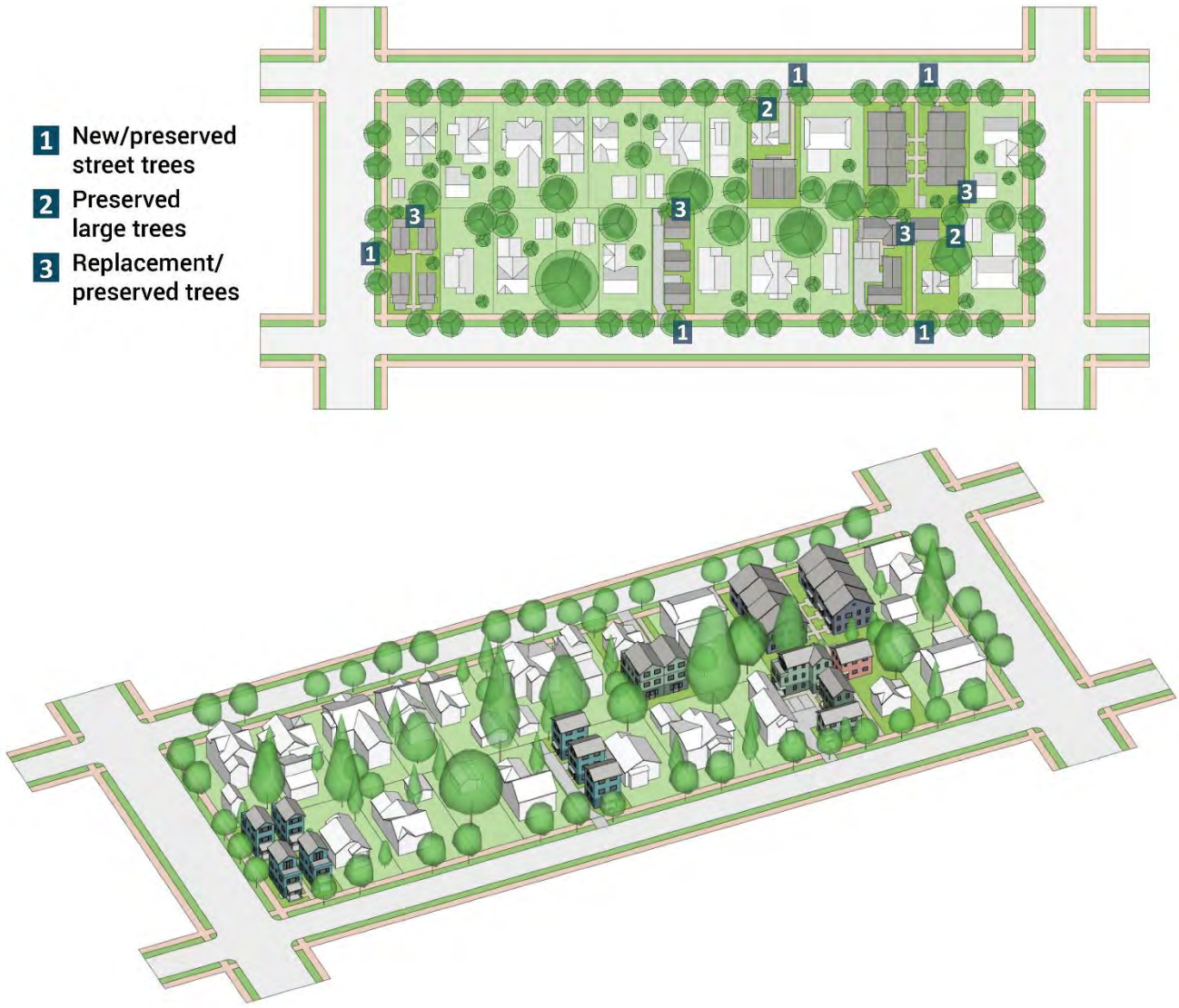
Note: This model illustrates potential redevelopment over the next 20 years with greater allowances for detached unit middle housing types. It is not intended to show exact locations of development but that market-driven, incremental redevelopment over time would occur. This diagram has been updated since the Draft EIS to annotate tree preservation and replacement opportunities.
Source: City of Seattle, 2024~~3~~; MAKERS, 2024~~3~~.

Exhibit 3.6-101. Example Neighborhood Residential Block with an Alley Redevelopment—Stacked Flats Focus



Note: This model illustrates potential redevelopment over the next 20 years with greater allowances for stacked flat middle housing types. It is not intended to show exact locations of development but that market-driven, incremental redevelopment over time would occur. This diagram has been updated since the Draft EIS to annotate tree preservation and replacement opportunities.
Source: City of Seattle, 2024~~3~~; MAKERS, 2024~~3~~.

Exhibit 3.6-102. Example Neighborhood Residential Block without an Alley Redevelopment—Detached/Attached Units Focus



Note: This model illustrates potential redevelopment over the next 20 years with greater allowances for detached unit middle housing types. It is not intended to show exact locations of development but that market-driven, incremental redevelopment over time would occur. This diagram has been updated since the Draft EIS to annotate tree preservation and replacement opportunities.
Source: City of Seattle, 2024~~3~~; MAKERS, 2024~~3~~.

Exhibit 3.6-103. Example Neighborhood Residential Block without an Alley Redevelopment—Stacked Flats Focus



Note: This model illustrates potential redevelopment over the next 20 years with greater allowances for stacked flat middle housing types. It is not intended to show exact locations of development but that market-driven, incremental redevelopment over time would occur. This diagram has been updated since the Draft EIS to annotate tree preservation and replacement opportunities.
Source: City of Seattle, 2024~~3~~; MAKERS, 2024~~3~~.

Exhibit 3.6-104. Example Hilly Neighborhood Residential Block Redevelopment—Detached/Attached Units Focus



Note: This model illustrates potential redevelopment over the next 20 years with greater allowances for detached unit middle housing types. It is not intended to show exact locations of development but that market-driven, incremental redevelopment over time would occur. This diagram has been updated since the Draft EIS to annotate tree preservation and replacement opportunities.
Source: City of Seattle, 2024~~3~~; MAKERS, 2024~~3~~.

Exhibit 3.6-105. Example Hilly Neighborhood Residential Block Redevelopment—Stacked Flats Focus



Note: This model illustrates potential redevelopment over the next 20 years with greater allowances for stacked flat middle housing types. It is not intended to show exact locations of development but that market-driven, incremental redevelopment over time would occur. This diagram has been updated since the Draft EIS to annotate tree preservation and replacement opportunities.
Source: City of Seattle, 2024~~3~~; MAKERS, 2024~~3~~.

Privacy. With more buildings redeveloping up to 3 stories, often stretching further along the side lot lines than existing houses, modest changes to sense of privacy may occur. Because side setbacks would be required, builders would likely include windows along the side lot line, and some balconies may face neighboring properties. Neighbors may feel that more people can look towards their yard or house. This may be mitigated with landscaping and window placement, and impacts would not likely be more significant or adverse than development already allowed in Neighborhood Residential zones.

Usable open space. Greater allowances for the height, bulk, and scale of middle housing buildings in Alternative 3 could impact the amount of usable open space on neighborhood residential lots. For purposes of our analysis, "useable" open space was defined as open space that meets a minimum of 10 feet in both directions or 13 feet in both directions when the open space includes a path leading to multiple units. Existing detached houses often have fairly large rear yards and sometimes large front yards. The usable open space of development prototypes allowed in existing Neighborhood Residential zones that were studied ranged from 21% to 72% of the lot. The useable open space of the middle housing prototypes studied ranged from 22% to 45% of the lot.

The open space configurations vary with some sites having opportunities for shared common outdoor space amongst neighbors and others having smaller outdoor spaces accessible to individual units. In general, attached units and stacked flat types, especially when combined with alley parking and/or low parking ratios, allow for greater contiguous open spaces (as shown in **Exhibit 3.6-101, Exhibit 3.6-103,** and **Exhibit 3.6-105**). These could serve as shared spaces amongst neighbors and provide enough space for a variety of activities, such as children's play and larger group socializing. Detached types generally separate the open space into smaller areas that would provide enough space for activities like barbecues and small group socializing (as shown in **Exhibit 3.6-100, Exhibit 3.6-102,** and **Exhibit 3.6-104**). See **Exhibit 3.6-106** for example open space layouts.

Mixed-use environment. Allowing small commercial uses only on corner lots (as illustrated in **Exhibit 3.6-100** and **Exhibit 3.6-101**) could result in modest visual changes from a residential character to a slightly more mixed-use environment. This change would likely enhance the street level experience with ground floor activities and building design that is more public in nature than private homes, adding visual interest and attractions and allowing for stronger building-to-street relationships.

The following diagrams illustrate likely amounts and types of development over the next 20 years with greater allowances for a range of middle housing types. The models show prototypical Seattle neighborhood blocks (no precise location) that include alleys, no alleys, and steeper terrain (with and without alleys). For each block type, the first model shows concepts focused more on detached units, and the second model shows more detached/attached and stacked flats concepts.

Transitions

Alternative 3 would increase intensity in currently low-intensity neighborhood residential zones but would retain a height gap between neighborhood residential zones and most zoning

in regional and urban centers. In general, transitions under Alternative 3 are likely to be less intense between urban neighborhood areas and regional and urban centers than under the No Action Alternative. Depending on development outcomes, new middle housing may help soften transitions to existing neighborhood commercial zones or in areas with pre-zoning non-conforming uses.

Tree Canopy

The increase in size and number of buildings allowed on a lot in Alternative 3 will likely decrease the amount of space available for trees on neighborhood residential lots. Prototypes that preserve contiguous open space (e.g., stacked flats, small apartments, or attached units) are likely better able to avoid impacts to existing trees and retain more contiguous planting areas for new trees. Detached and semi-attached prototypes tended to have most of their open space in the front, rear, and side setbacks. The narrow (5-foot) side setbacks have limited value for plantings or performing stormwater functions. See **Exhibit 3.6-106**.

Existing trees may also be impacted by construction activities outside of the building and parking area footprints (grading, utility locations, etc.). Prototypes with multiple detached buildings are likely to be more impactful on existing trees due to excavation and foundation construction, multiple utility connections, and other construction impacts.

Impacts to impervious surface coverage is also an important consideration. In the middle housing types studied, we identified the impervious surfaces of structures, surface parking, driveways, outside trash storage areas, and pathways. Of the types studied, the impervious surface area ranged from 47 to 78% percent. In other words, between 22% and 53% of the site remained pervious area to help with water absorption and stormwater runoff. Several prototypes would surpass the existing lot coverage maximum of 35% in Neighborhood Residential zones. Parking areas increased the total impervious surfaces significantly for most prototypes. Requiring new paved surfaces to be permeable, reducing or eliminating parking requirements, and encouraging parking solutions that minimize impervious surface could mitigate some of the additional impervious surface cover change.

Shadows

Height limits do not increase (or only increase modestly with an affordability bonus) under Alternative 3, so shadow impacts would not likely increase significantly over the No Action Alternative. However, greater bulk on more sites may cast shadows on more places.

Views

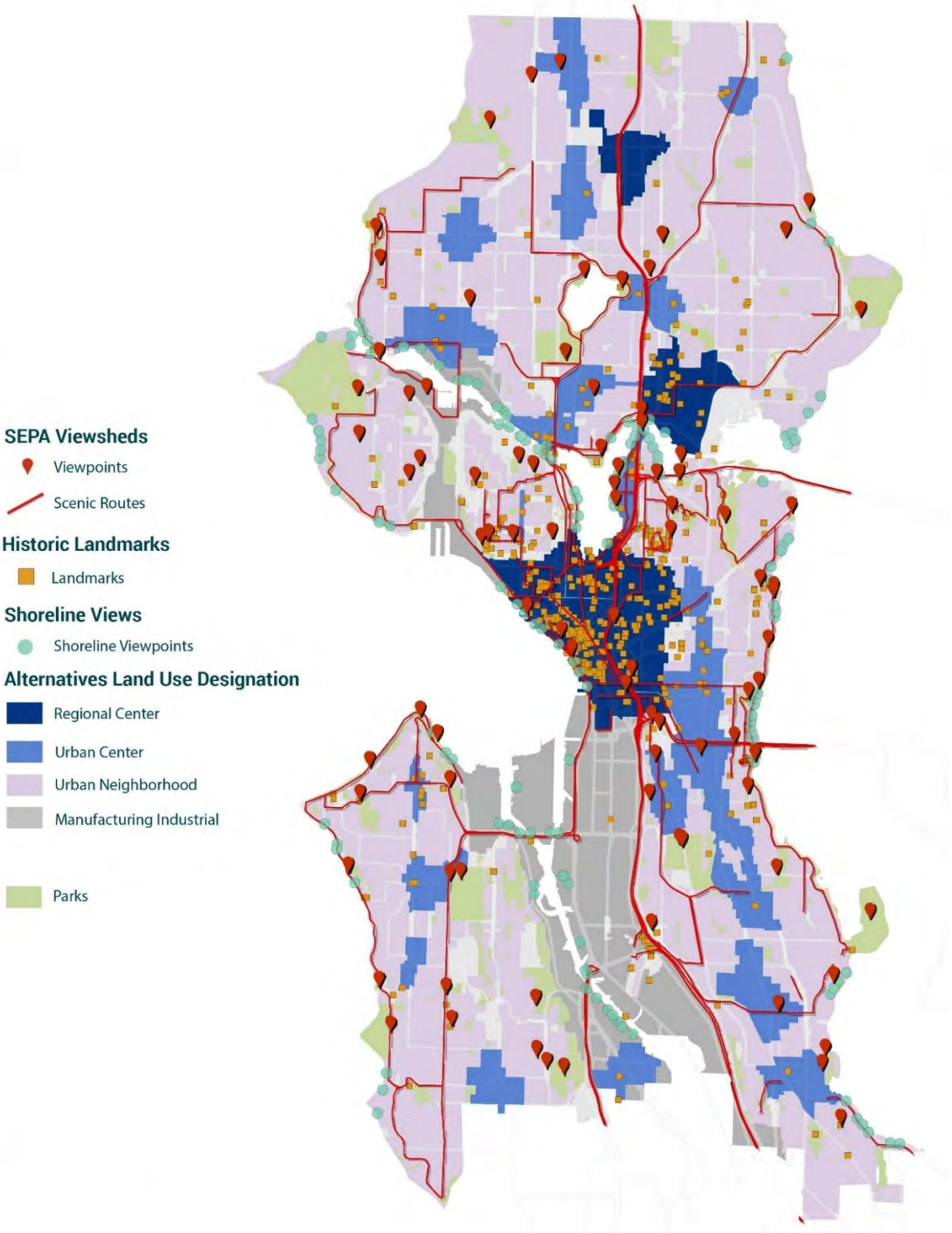
Alternative 3 is unlikely to have impacts on views beyond the No Action Alternative as it would have no height increase for market-rate development and a minimal height increase for affordable housing. The potential for more people to live near the viewpoints may increase awareness and recognition of these public amenities and neighborhood parks. See **Exhibit 3.6-107**.

Exhibit 3.6-106. Relationship of Middle Housing Types and Useable Open Space



Source: MAKERS, 2023.

Exhibit 3.6-107. Seattle Views Map—Alternative 3



Note: 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 the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle and MAKERS, 2023

Equity & Climate Vulnerability Considerations

Housing Type Variety and Choice

Alternative 3 would allow middle housing types such as duplexes, triplexes, fourplexes, sixplexes, and stacked flats in all Neighborhood Residential zones. The likely increase in housing type variety would provide more options for people to stay in their community over a lifetime and across generations as their needs change. Housing configurations that cluster more units together on a site provide more opportunities for intergenerational families to live near each other. Increasing the amount and types of housing allowed across the city also lets more people live in areas from which they are economically excluded in Alternative 1.

Relationship to Active Transportation

Alternative 3 could slightly increase density throughout the city but could also introduce commercial spaces and corner stores into more areas of the city. Nearby commercial spots provide locations where people can walk and roll for their shopping and leisure needs. Such a change would help mitigate climate impacts and improve chances at social connectedness.

Relationship to Social Wellbeing & Sociability

Alternative 3 could change some aspects of how neighborhoods are currently experienced, from the street level/sidewalk experience as described in Alternative 3's **Height, Bulk, & Scale** section and illustrated in **Exhibit 3.6-100** through **Exhibit 3.6-105**. In general, social interaction opportunities would likely increase.

Although possible future development of middle housing may lead to less open space on lots than under Alternative 1, more units would surround and share the available open space, which would increase opportunities for sociability amongst neighbors. See Alternative 3's **Height, Bulk, & Scale** section.

Climate Change

Most growth under Alternative 3 would continue to be concentrated in existing centers, away from most hazards, with additional growth spread throughout the urban neighborhood place type. Compared to the No Action Alternative and Alternative 2, distributing more growth in urban neighborhoods could increase the potential for populations to be closer to areas susceptible to flooding, sea-level rise, or landslides or affected by interruptions in access to their neighborhoods. Alternative 3 may also decrease pervious area and space for tree planting in neighborhood residential zoned areas, which may have impacts on flooding and urban heat (see **Tree Canopy**). Like the other action alternatives, Alternative 3 would include a new Environment and Climate Element with mitigation and adaptation strategies as well as policies regarding tree canopy protection or enhancement and critical area regulations. See also the discussion under **Impacts Common to All Alternatives**.

Impacts of Alternative 4: Corridor

Land Use Patterns & Compatibility

Alternative 4 would introduce corridors as a new place type that focuses a wider range of housing options and growth near transit and amenities (see **Exhibit 2.4-19**). Corridors are defined as areas within a 10-minute walk from a light rail station and a 5-minute walk from frequent bus transit service and entrances to large parks. Under this definition, corridors include about 50% of areas currently zoned Neighborhood Residential, excluding parks. These areas could allow a wide range of housing types ranging from detached homes to duplexes, triplexes, and fourplexes or 5-story buildings closer to transit and limited 6- and 7-story buildings in or adjacent to areas already zoned multifamily or commercial. Corridors also include some areas already zoned for multi-family and commercial use.

Alternative 4 studies total housing growth of 100,000 housing units (20,000 more than the No Action Alternative) to account for potential additional housing demand that could be met within corridors. As described under **Impacts Common to All Alternatives**, most new growth would be focused within existing centers currently characterized by higher densities and a more diverse mix of uses than other areas of the city. Housing growth within the centers would be the same as the No Action Alternative and Alternatives 2 and 3. Activity levels and activity units per acre would be similar to those described under Alternatives 2 and 3 as a result of the slight jobs shift to corridors (see **Exhibit 3.6-108**). Land use patterns and potential compatibility impacts within the centers would be similar to those described under **Impacts Common to All Alternatives**. Compared to the No Action Alternative, adverse compatibility impacts at the periphery of most centers could be minimized as the abutting corridors redevelop with moderate-scale development (see also the **Transitions** section below).

Under Alternative 4, corridors would accommodate the second highest share of anticipated housing growth behind regional centers (see **Chapter 2**). More than half (57%) of the additional new housing growth in corridors would be directed into areas 1 and 2. However, compared to Alternative 3, this growth would be focused to densify corridors rather than all neighborhood residential zones. Area 2 would receive the greatest overall share of new housing growth under Alternative 4 (21%), followed by Area 4 (19%) and Area 1 (17%). A small number of jobs and commercial space would shift from the larger centers towards corridors to reflect local demand with the distribution of new housing.

Over time, overall land use patterns would become denser within the corridors. This could result in localized land use compatibility impacts within the corridors or on the border with adjacent residential areas where newer development is of greater height and intensity than existing development (see also the **Urban Form** section below). Such impacts would be mitigated through application of the City's development regulations (including shoreline regulations) and design review process where applicable.

Exhibit 3.6-108. Future Activity Units (AU)—Alternative 4

Center	Existing AU/Ac.	Alt. 1 AU/Ac.	Alt. 4 Acres	Alt. 4 AU	Alt. 4 AU/Ac.
Regional Centers[1]					
Downtown	377.4	473.2	952	448,614	471.2
First Hill/Capitol Hill	139.5	163.4	916	149,645	163.3
University Community	54.5	70.2	753	52,773	70.0
South Lake Union	236.7	344.1	340	116,153	341.8
Uptown	131.3	161.3	333	53,696	161.1
Northgate	57.3	75.1	412	30,860	74.9
Hub Urban Centers[1]					
Ballard	67.7	96.9	495	47,906	96.7
Bitter Lake Village	44.0	55.4	364	20,086	55.2
Fremont	71.9	88.1	214	18,883	88.0
Lake City	57.6	75.4	142	10,700	75.2
Mt Baker	36.0	47.4	491	23,196	47.2
West Seattle Junction	70.4	100.2	269	26,927	100.0
Residential Urban Centers[1]					
23rd & Union-Jackson	38.9	46.5	625	29,059	46.5
Admiral	49.2	60.4	98	5,935	60.3
Aurora-Licton Springs	44.1	51.4	327	16,784	51.3
Columbia City	33.9	46.1	335	15,411	46.0
Crown Hill	25.3	31.4	271	8,499	31.4
Eastlake	70.2	82.0	199	16,329	82.0
Green Lake	70.6	87.4	109	9,495	87.3
Greenwood-Phinney Ridge	84.5	101.6	94	9,546	101.3
Madison-Miller	65.3	85.1	145	12,357	85.0
Morgan Junction	34.1	41.6	113	4,706	41.5
North Beacon Hill	28.1	34.5	267	9,175	34.4
Othello	23.7	29.0	499	14,503	29.1
Rainier Beach	23.0	26.0	346	9,007	26.0
Roosevelt	61.4	81.2	170	13,808	81.2
South Park	14.7	18.5	263	4,847	18.4
Upper Queen Anne	89.5	110.5	53	5,806	110.3
Wallingford	42.2	51.5	258	13,258	51.4
Westwood-Highland Park	27.9	32.6	275	8,948	32.5

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 the other a~~A~~lternatives ~~2-5~~.
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 hub and residential urban ~~villages~~ centers 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.

Urban Form

Height, Bulk, & Scale

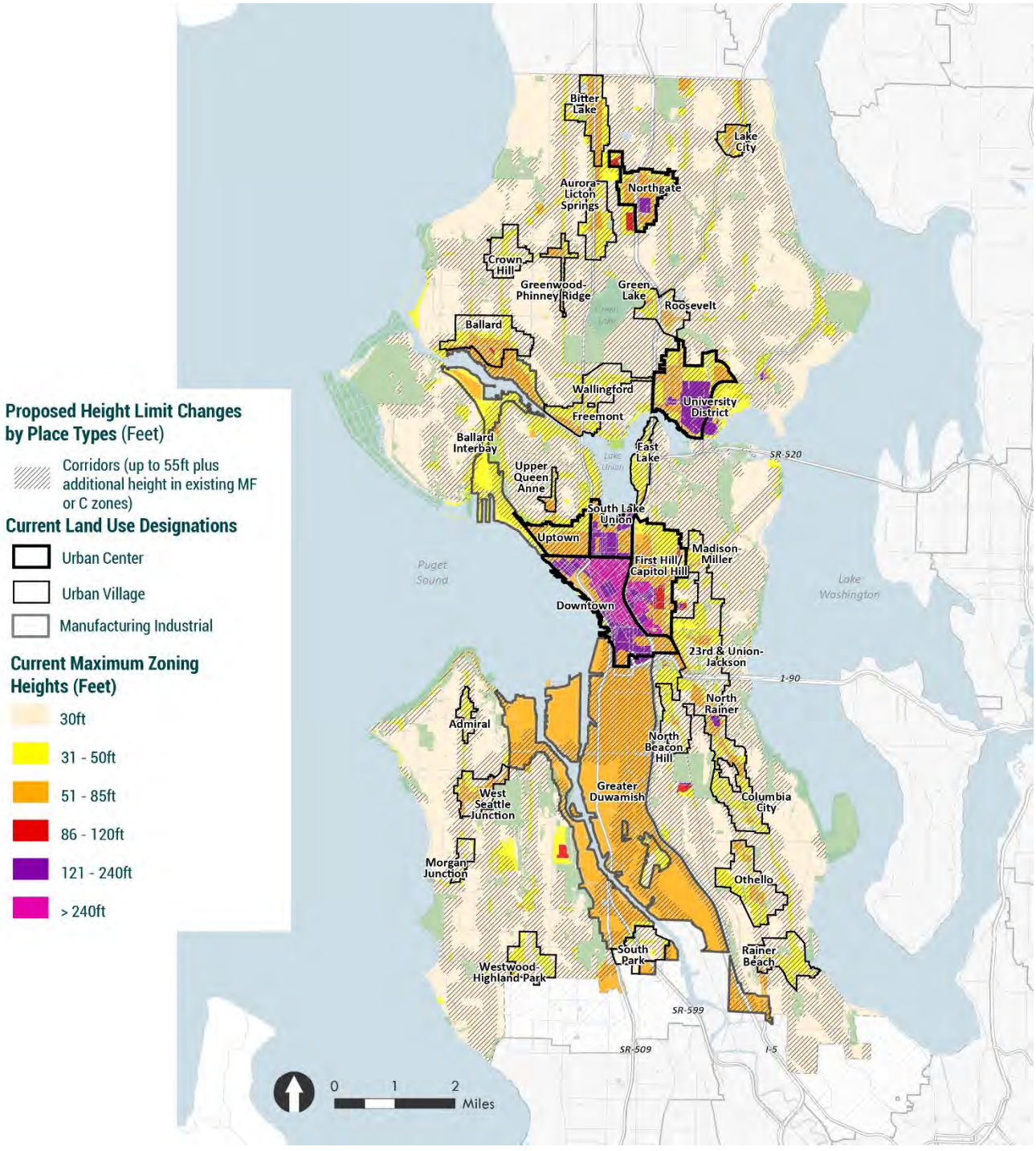
Corridors could contain a mix of residential and mixed-use development from duplex, triplex, and fourplexes to 5-story apartments and mixed-use buildings. Corridors also include some areas already zoned for multi-family and commercial development where height limits could be up to 6- or 7-stories. See **Exhibit 3.6-109**. Over time, overall building height and bulk in the new corridor areas would likely increase with new development. 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. The scale of the area where changes in height and bulk would be allowed is similar to Alternative 3, as about 50% of urban neighborhood area would become a corridor place type. Localized impacts could occur as the areas transition to a more intense development pattern. However, future development in corridors adjacent to regional and urban centers would likely be more similar to current development happening in those areas and register as less stark impacts.

Alternative 4 could also result in height, bulk, and scale impact between properties in corridors where areas that are predominately 1- and 2-story detached homes might experience gradual redevelopment with multifamily homes of 4- and 5-stories on a site-by-site basis. Differences in massing on adjacent properties could be especially larger on sites with existing multifamily and commercial zones where new development could be as high as 7-stories. These transitions between parcels are not likely to be significantly more intense than those already occurring in many regional and urban centers but would occur in new areas.

Like Alternatives 2 and 3, Alternative 4 would introduce a new type of infill area (corridors) on the low end, potentially reducing contrast between regional and urban centers and other areas. Corridor areas already differ from most parts of low-intensity neighborhoods in terms of traffic, noise, impervious surfaces, and in many cases building scale. As a result, Alternative 4 would likely heighten contrasts between corridor areas and adjacent lower intensity areas, especially in parts of the city where few transit corridors are present, like West Seattle. In areas where a high number of transit corridors are already present—like the Central District and Ravenna—the overall effect may be to create smoother transitions because overlapping corridors will create continuous areas of zoning at the scale of 4-6 stories.

Alternative 4 could also lessen transitions along arterial streets where Neighborhood Commercial zoning occupies a half-block along the arterial and Neighborhood Residential zoning exists on the other half of the block. New zoning under this alternative could result in a more gradual transition from Neighborhood Commercial zoning to lower-density areas.

Exhibit 3.6-109. Proposed Height Limit Changes—Alternative 4



Source: City of Seattle and MAKERS, 2023

Transitions

Tree Canopy

With more widespread redevelopment than No Action, private property may see a greater loss of existing tree canopy than No Action. At the same time, street frontage improvements with redevelopment would likely include street tree plantings.

Shadows

Height limits would increase from 30 feet to 55 feet in the corridor areas under Alternative 4. Height limits in areas currently zoned multifamily or commercial could increase to a higher overall height, although the change may be less since these areas are generally zoned for higher heights today. Because corridors cover large swaths of the city, shadow impacts would be widespread.

Shadows on Public Parks

Corridor areas are found on the south, west, and east sides (the sides most impactful to casting long-lasting shadows on the park) of nearly every park in Seattle under Alternative 4. Most parks would likely see increased shadows.

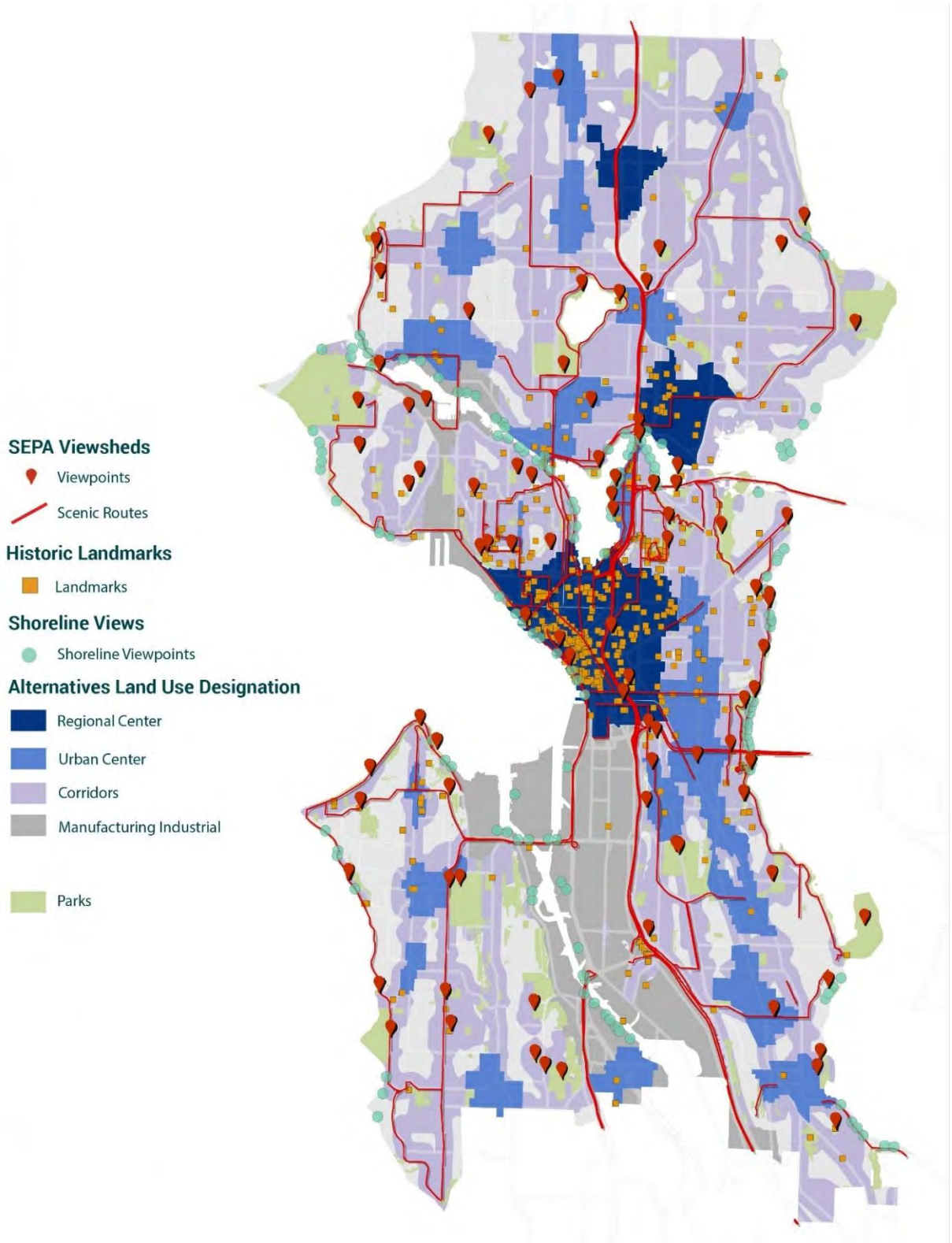
Shadows on Public Rights-of-Way

Taller buildings would likely develop in more areas in Seattle under Alternative 4, increasing the streets that would experience more time in shade. Shadows would particularly impact east-west streets (especially when development is on the south side) and the north faces of hills, with lesser impacts throughout.

Views

Most of the protected viewpoints and scenic routes are within or adjacent to the more intense development expected in the corridor place type. Thus, Alternative 4, with height increases from 30 feet to 45-55 feet may impact protected views. Only limited viewpoints will have minor degrees of potential future view disruptions. The low-impacted sites depend upon specific locational qualities such as along rights-of-way, near bodies of water, and at naturally high elevations. See **Exhibit 3.6-110**.

Exhibit 3.6-110. Seattle Views Map—Alternative 4



Note: 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 the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle, 2023; MAKERS, 2023.

Equity & Climate Vulnerability Considerations

Housing Type Variety and Choice

Alternative 4 offers a wider range of housing types ranging from detached homes, middle housing (e.g., duplexes, fourplexes, etc.), and 5-story buildings close to transit and parks. The likely increase in housing type variety would provide more options for people to stay in their community over a lifetime and across generations as their needs change. Increasing housing type options across half of neighborhood residential zones in the city also increases the opportunities for people to live in parts of the city economically closed off to them in Alternative 1.

Relationship to Active Transportation

Alternative 4 could moderately increase density near transit and large parks. Nearby parks provide locations where people can walk and roll for their play and leisure needs. More people living within a 10-minute walk from light rail and a 5-minute walk from frequent bus transit likely increases the number of people walking, rolling, and using transit. Such a change would help mitigate climate impacts and improve chances at social connectedness.

Relationship to Social Wellbeing & Sociability

More housing within a 5-minute walk to large parks under Alternative 4 would likely increase opportunities for social interactions and social wellbeing. At the same time, the number of people living along inhospitable arterials, where social interactions can be inhibited by traffic's impact on sense of safety, air quality, and noise would likely increase.

Climate Change

Growth under Alternative 4 would be concentrated in existing centers and in corridors away from most hazards. More people living within a 10-minute walk from light rail and a 5-minute walk from frequent bus transit likely increases the number of people walking, rolling, and using transit. Such a change would help mitigate climate impacts. Like the other action alternatives, Alternative 4 would include a new Environment and Climate Element with mitigation and adaptation strategies as well as policies regarding tree canopy protection or enhancement and critical area regulations. Also see Alternative 4's **Tree Canopy** section for potential tree-related impacts, which could impact urban heat and flooding, and the discussion under **Impacts Common to All Alternatives**.

Impacts of Alternative 5: Combined

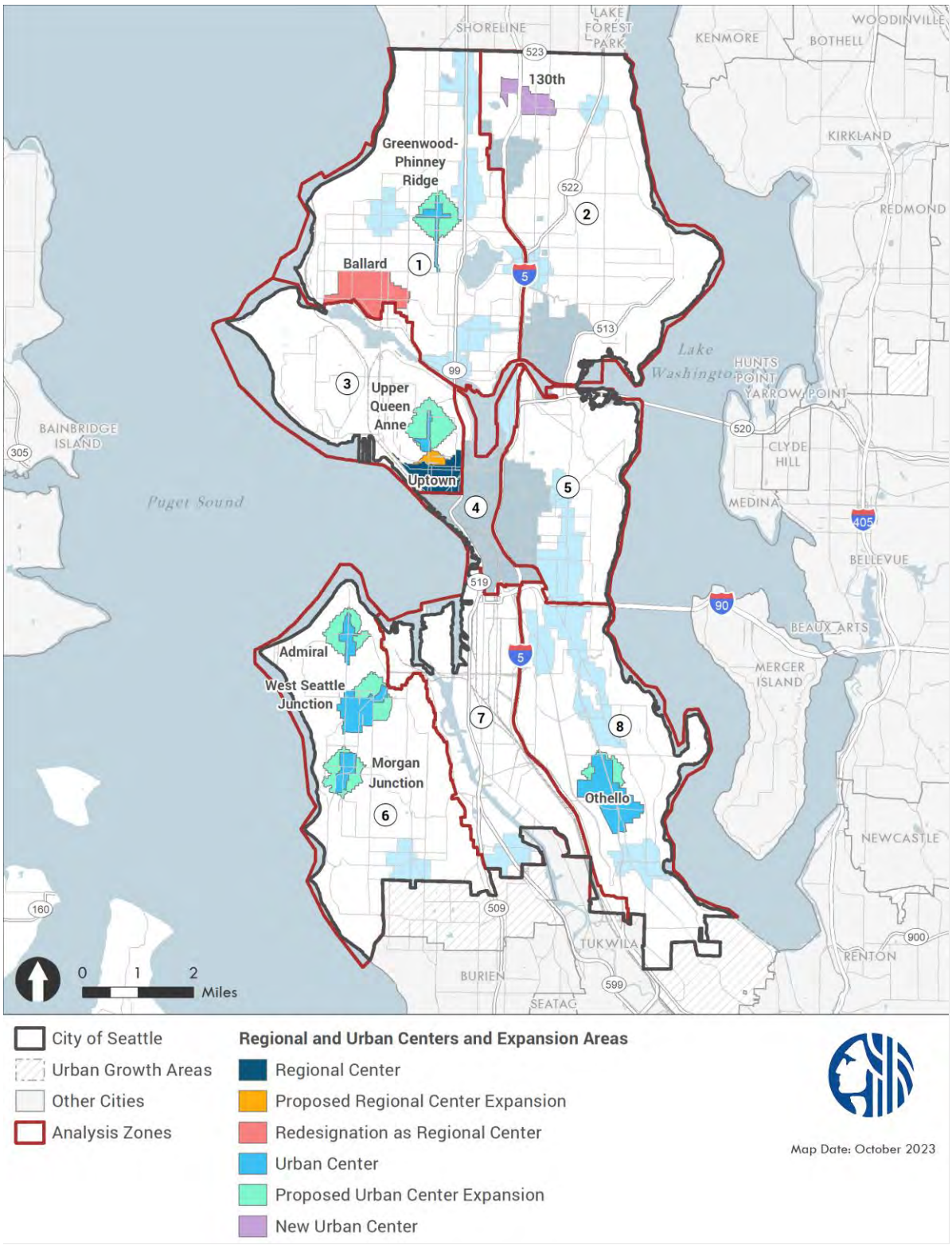
Land Use Patterns & Compatibility

Alternative 5 anticipates the largest increase in supply and diversity of housing across Seattle. It includes the strategies for encouraging housing growth in Alternatives 2, 3, and 4 plus some additional changes to existing center boundaries and changes to place type designations (see **Exhibit 2.4-22**). Alternative 5 also expands the boundaries of seven centers (the Uptown Regional Center~~,~~ and West Seattle Junction, Admiral, Greenwood-Phinney Ridge, Morgan Junction, Othello, and Upper Queen Anne urban centers), designates the NE 130th Street Station Area as a new urban center, and re-designates Ballard as a regional center (see **Exhibit 3.6-111**).

Alternative 5 studies total housing growth of 120,000 housing units (40,000 more than the No Action Alternative and 20,000 more than Alternatives 2, 3, or 4) to account for potential additional housing demand that could be met within the areas of change. As described under **Impacts Common to All Alternatives**, most new growth would still be focused within the centers currently characterized by higher densities, more compact building forms, and a more diverse mix of uses than other areas of the city. Housing growth within the centers under Alternative 5~~, however,~~ would be similar to Alternative 4 (higher than the No Action Alternative or Alternative 3)~~under Alternative 5 than the other alternatives~~. Residential urban centers would accommodate the second highest share of anticipated housing growth behind regional centers (see **Chapter 2**).

Land use patterns and potential compatibility impacts within most of the centers would be similar to those described under **Impacts Common to All Alternatives**. The ~~six~~ seven expanded center boundaries consist primarily of single-family residential areas neighboring mixed-use and commercial development nodes within the existing center boundaries. Over time, these areas would gradually convert to denser multifamily residential and mixed-use patterns of development. The Uptown Regional Center expansion area primarily consists of existing multifamily development—as a result, future land use patterns would likely be similar in scale and intensity to the No Action Alternative even if the area redevelops with more mixed use. Adverse compatibility impacts at the periphery of most centers would be minimized ~~the most~~ under Alternative 5 more than Alternatives 1 through 4 as the abutting neighborhood center, corridor~~s~~, and urban neighborhood areas redevelop (see also the **Transitions** section below).

Exhibit 3.6-111. Expanded, Redesignated, and New Regional and Urban Centers—Alternative 5



Note: See **Exhibit 2.1-1** in **Chapter 2** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other a~~A~~lternatives ~~2–5~~.
Source: City of Seattle, 2023; BERK, 2023.

Activity levels and activity units per acre would vary from the other alternatives as a result of the increased overall growth and change in center boundaries. Under Alternative 5, the redesignated Ballard Regional Center would meet PSRC's ~~Metro~~ Urban Regional Growth Center size and activity unit density criteria. Unlike the ~~other a~~Alternatives 1 through 4, Othello, Rainier Beach, and South Park would also meet King County's minimum density criteria for Countywide Centers. However, Admiral, Morgan Junction, and Upper Queen Anne would fall below planned density criteria and Othello would be above the size threshold as a result of their increased size. 23rd & Union-Jackson, Green Lake, Lake City, and Madison-Miller would also still be outside the size threshold. See **Exhibit 3.6-112**.

PSRC ~~Metro~~ RGCs require a minimum density of 30 existing activity units and 85 planned activity units for Metro RGCs, 18 existing activity units and 45 planned activity units for Urban RGCs, and are expected to be between 320–640 acres in size (or larger if served by an internal, high-capacity transit system). Appendix 6 of the King County CPPs includes higher activity unit thresholds for Metro and Urban RGCs (60 existing/120 planned for Metro RGCs and 30 existing/60 planned for Urban RGCs). Per the CPPs, not meeting existing activity unit thresholds for existing centers (all of Seattle's Regional Centers except for Ballard under the Preferred Alternative) is not grounds for de-designation or re-designation by the Growth Management Planning Council.

King County countywide centers require an existing density of at least 18 activity units and planned density of at least 30 activity units and are expected to be between 160–500 acres in size.

See also **Section 3.7 Relationship to Plans, Policies, & Regulations**.

Under Alternative 5, neighborhood centers would accommodate the third highest share of anticipated housing growth behind regional centers and urban centers (see **Chapter 2**). Like Alternative 2, about half (49%) of housing growth in neighborhood centers would be directed into those with low displacement risk in areas 1 and 2 and about 11% would be directed into neighborhood centers with high displacement risk (notably in Area 6). Housing growth in the corridors and urban neighborhood areas would be focused in Area 2 followed by Areas 8, 6, and 1. Land use patterns and potential adverse compatibility impacts within the new place types would be similar to those described under Alternatives 2, 3, and 4 and the Preferred Alternative.

Overall, Alternative 5 distributes more growth to a greater number of locations than any other alternative. This is likely to result in a denser land use pattern citywide with focused growth in the centers and smaller mixed-use nodes in the new neighborhood centers and along corridors with frequent transit. Impacts would be mitigated through application of the City's development regulations (including shoreline regulations) and design review process.

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.
Regional Centers[1]					
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[2]	131.3	161.3	391	53,723	137.2
Northgate	57.3	75.1	412	30,803	74.7
Ballard[2]	67.7	96.9	495	50,047	101.0
Hub Urban Centers[1]					
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
Mt Baker	36.0	47.4	491	23,135	47.1
West Seattle Junction[2]	70.4	100.2	449	26,934	59.9
Residential Urban Centers[1]					
130th Street[2]	18.4	20.7	218	7,733	35.5
23rd & Union-Jackson	38.9	46.5	625	29,046	46.5
Admiral[2]	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[2]	84.5	101.6	315	9,579	30.4
Madison-Miller	65.3	85.1	145	12,349	85.0
Morgan Junction[2]	34.1	41.6	281	7,169	25.5
North Beacon Hill	28.1	34.5	267	9,161	34.3
Othello[2]	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[2]	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 the other a~~A~~lternatives ~~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 hub and residential urban ~~villages~~ centers 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.

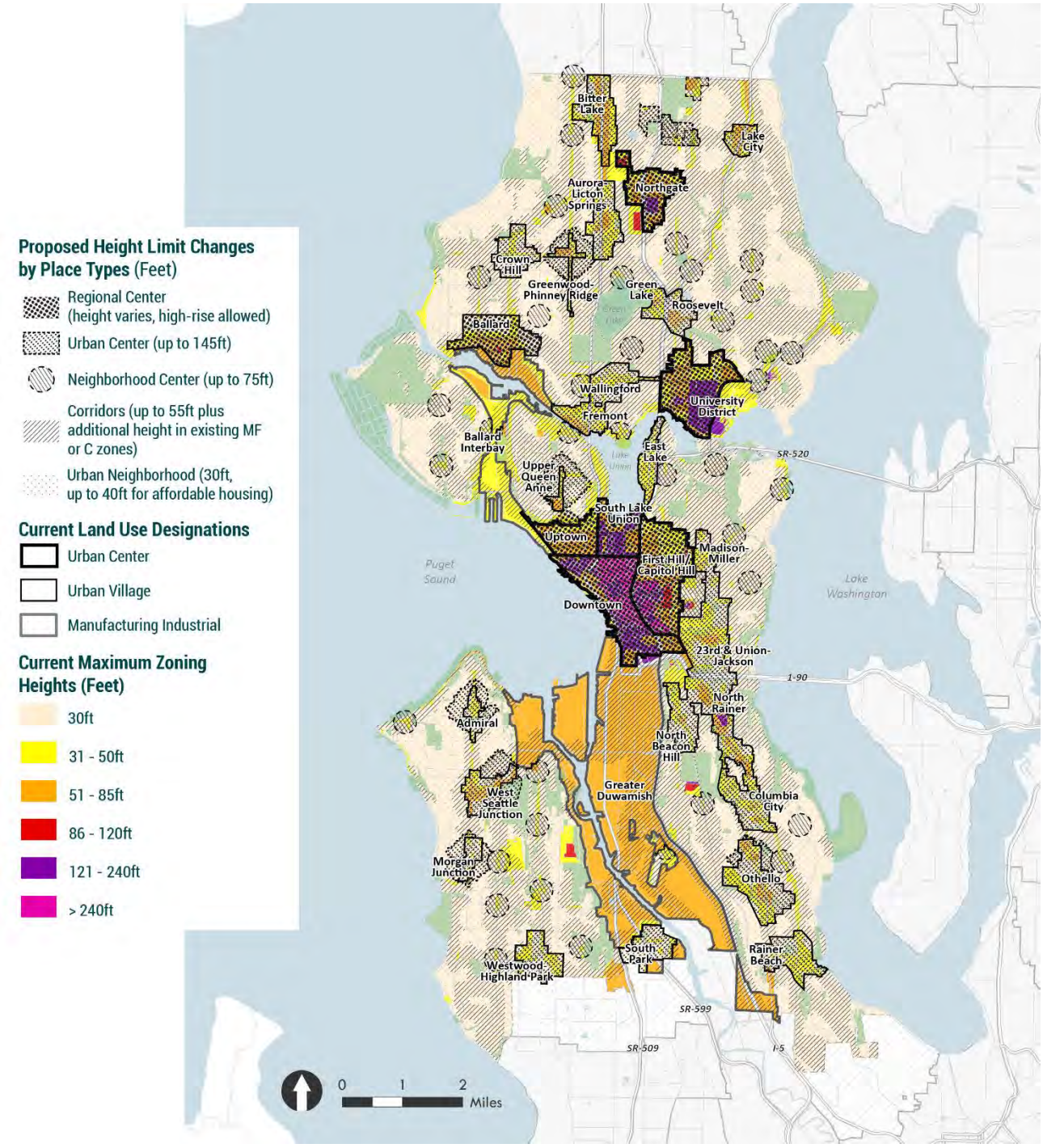
Urban Form

Height, Bulk, & Scale

Alternative 5 is a combination of Alternatives 2, 3, and 4, meaning no residential area in the city would be zoned exclusively for detached housing. Over time, overall building height and bulk in the city would likely increase with new development under Alternative 5 (see **Exhibit 3.6-113**). Under its new designation as a regional center, Ballard could be considered for heights above the current maximum of eight stories as part of future planning work since the Comprehensive Plan designates regional centers as appropriate for high-rise development. Expanded urban centers—such as the three in West Seattle, Greenwood-Phinney Ridge, Othello, and Upper Queen Anne—would allow higher development in areas that are currently zoned neighborhood residential with existing buildings that are predominately 1- and 2-story. Under Alternative 5, localized conflicts could occur as areas transition to a more intense development pattern. However, unlike other alternatives, the changes in height, bulk, and scale under Alternative 5 would occur over a larger area. Consequently, localized impacts may be more distributed throughout the city.

Alternative 5 could also result in height, bulk, and scale impacts between properties in neighborhood centers, corridors, and expanded regional and urban centers where areas that are predominately 1- and 2-story detached homes might experience gradual redevelopment with larger multifamily homes on a site-by-site basis. Differences in massing could be especially larger where affordable housing projects use potential height and floor area bonuses. Differences in massing on adjacent properties are not likely to be significantly more intense than those already occurring in many regional and urban centers, but the area in which they might occur would be the largest among the alternatives.

Exhibit 3.6-113. Proposed Height Limit Changes—Alternative 5



Note: 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 the other a~~A~~lternatives ~~2-5~~.
Sources: City of Seattle, 2023; MAKERS, 2023.

Transitions

The addition of two new types of infill areas (neighborhood centers and corridors) as well as middle housing in urban neighborhood areas will overall create smoother and more varied transitions in intensity throughout the city. As development occurs piecemeal, stark contrasts in building scale may appear, but over time feathered gradations of intensity will fill in around corridors, nodes of activity, neighborhood amenities, and urban villages.

Tree Canopy

With the most redevelopment potential, losses to existing tree canopy on private property could be greatest under Alternative 5. However, required frontage improvements may increase street tree plantings.

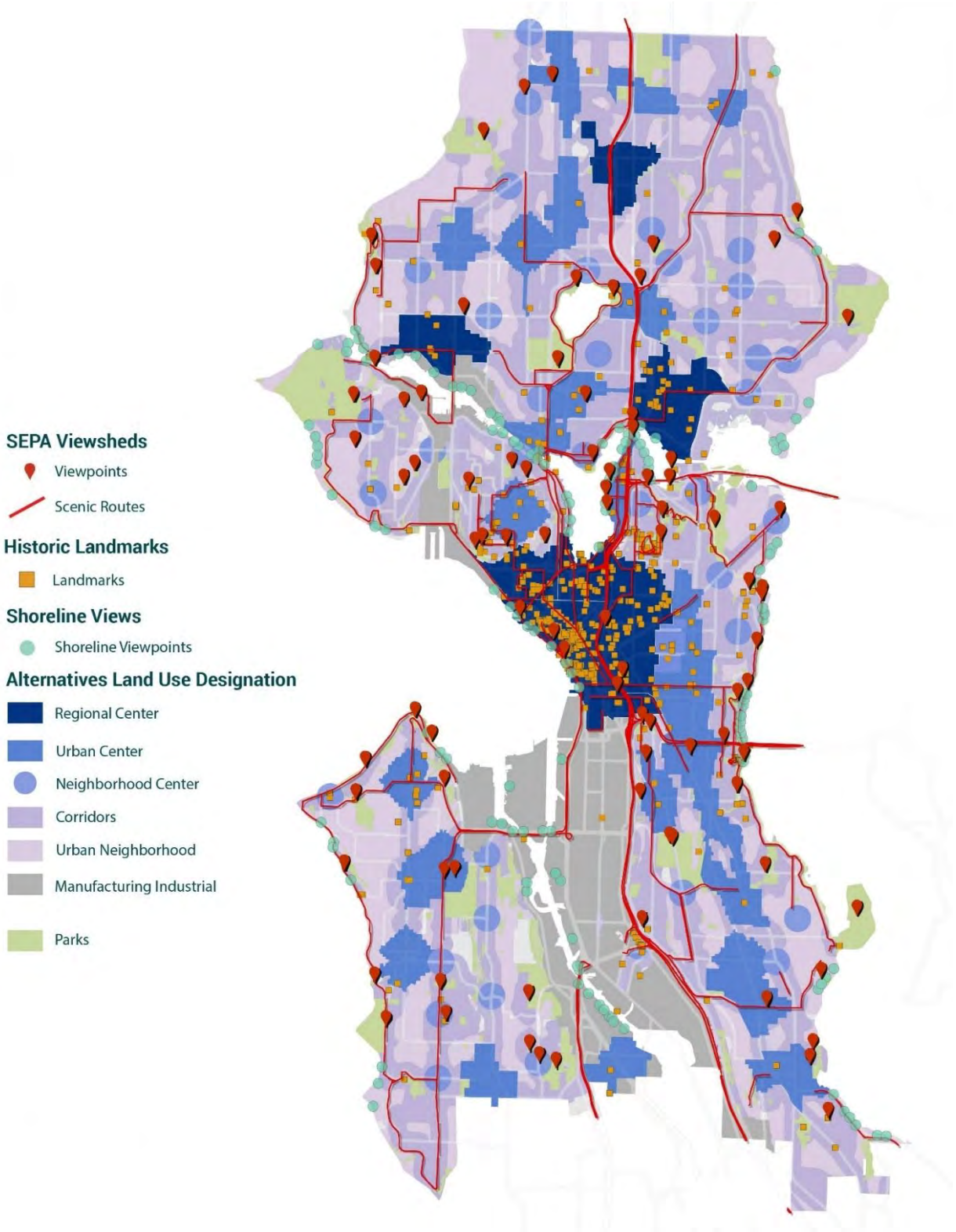
Shadows

Shadow impacts under Alternative 5 would include all the impacts discussed under the other alternatives. In addition, expanded regional and urban center boundaries under Alternative 5 would increase areas with potential shadows on public rights-of-way and parks.

Views

Impacts to views under Alternative 5 would be similar to those described under Alternative 4, with additional effects on scenic and landmark view sites captured in potential expansion and designation of regional and urban centers, such as the proposed extension of three urban centers in West Seattle and newly defined Ballard Regional Center. Allowing additional height for affordable housing development citywide could also create additional view impacts but would be limited by the number of affordable housing projects that are expected to be developed. Adverse impacts to Seattle's view corridors would likely occur under Alternative 5 due to substantial increased growth and development citywide. See **Exhibit 3.6-114**.

Exhibit 3.6-114. Seattle Views Map—Alternative 5



Note: 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 the other a~~A~~lternatives ~~2-5~~.
Source: City of Seattle, 2023; MAKERS, 2023.

130th/145th Station Area

Land Use Patterns & Compatibility

Under Alternative 5, a new urban center would be designated on both the west and east sides of I-5 at the Sound Transit light rail station, with zoning including Low-rise Residential, Midrise Multifamily, and Neighborhood Commercial (2 and 3). This area would include an existing commercial node around Pinehurst and an expanded residential mixed-use area closer to the station. Housing and job growth in the new 130th Street ~~Residential~~ Urban ~~Village~~ Center would be greatest under Alternative 5, with more growth clustered in the newly designated urban ~~village~~center.

Growth in the 145th Station Area would be similar to Alternative 2. Buildings would be denser than Alternative 2 with more mixed-use buildings and a wider variety of housing types allowed.

Over time, the station areas would likely redevelop into mixed-use nodes with a greater intensity of development than any of the other alternatives. Growth would increase activity unit density from 18.6 (existing) to 35.9 around NE 130th Street and from 35.7 (existing) to 79.4 around 15th and 145th. This increased density would represent a potential adverse land use impact of future growth in the station areas under Alternative 5. Such impacts would be mitigated through application of the City's development regulations and design review process. In addition, increased density citywide would lessen potential adverse compatibility impacts on the periphery of all new urban centers and neighborhood centers, including the station areas (see also the **Transitions** section below).

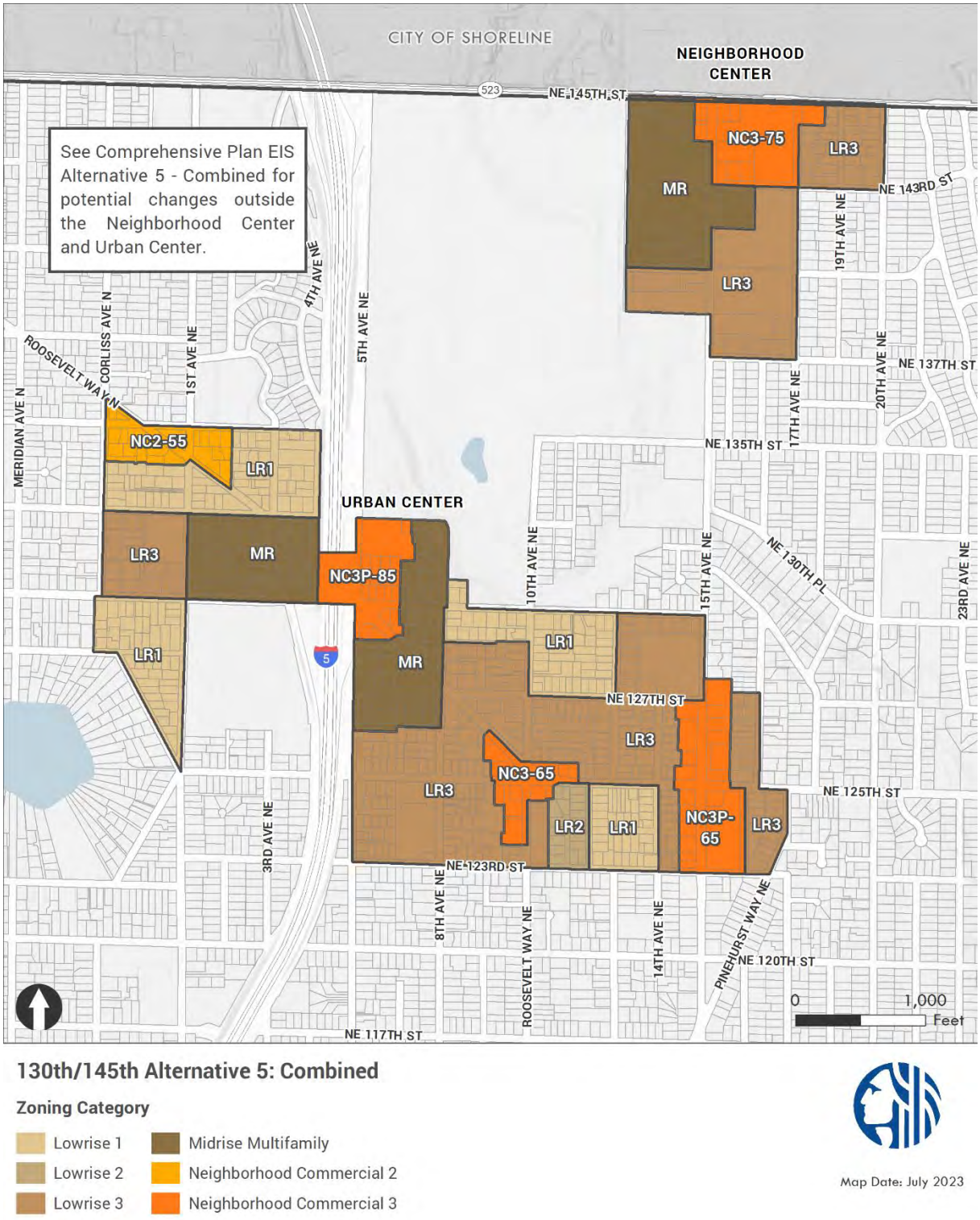
See **Exhibit 3.6-115** and **Exhibit 3.6-116**.

Exhibit 3.6-115. Station Area Share of Targets, 2024-2044—Alternative 5

Location	Place Type	Acres	New Housing Units	New Jobs	Existing AU/Ac.	Future AU/Ac.
NE 130th Street	Urban Center	218	1,644	356	18.4	35.5
15th & 145th	Neighborhood Center—Low Risk*	65	1,059	648	35.3	78.5

Note: The 130th Street and Pinehurst Neighborhood Centers from Alternative 2 are both part of the 130th Street Urban Center in Alternative 5. 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 the other a~~A~~lternatives ~~2-5~~.
*Risk of displacement.
Source: City of Seattle, 2023; BERK, 2023.

Exhibit 3.6-116. 130th/145th Station Area Zoning Concepts—Alternative 5: Combined



Note: 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 the other a~~A~~lternatives ~~2-5~~.
Sources: City of Seattle, 2022: BERK, 2022.

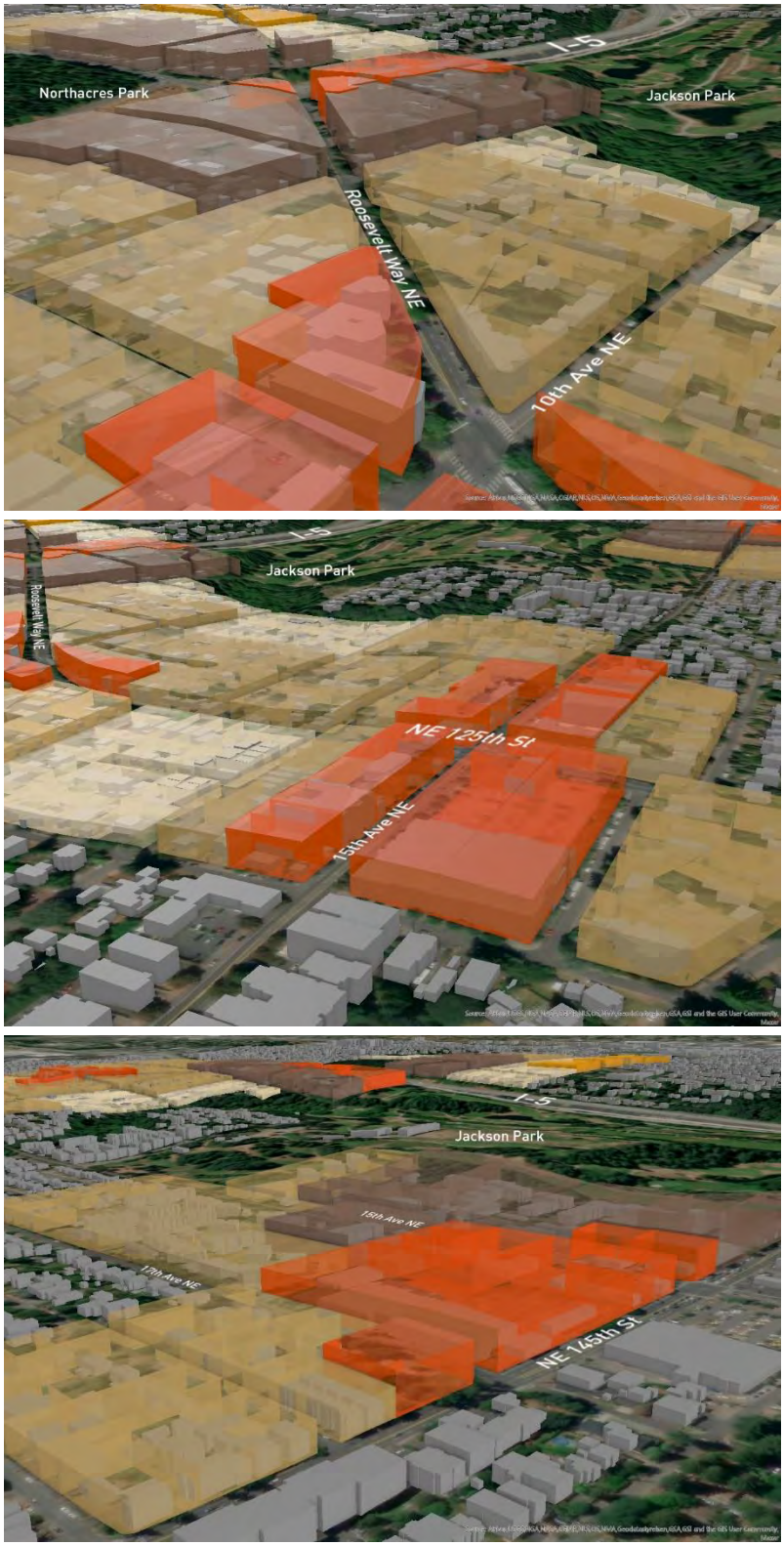
Urban Form

Height, bulk, and scale. Under Alternative 5, the area immediately next to the 130th light rail station could transition from primarily 1- and 2-story buildings up to 7- and 8-story buildings. The heights of buildings surrounding the 130th station, both to the east and the first block west of I-5 along 130th Street, could also develop over time into 6- to 8-story buildings. The core of the 145th station area would likely redevelop into a mixed-use node with buildings up to 7- and 8-stories, while heights in the surrounding area would be similar to the No Action Alternative. In the rest of the new urban center area, many existing 1- and 2-story buildings would likely develop over time into 3- to 5-story buildings. **Exhibit 3.6-117** and **Exhibit 3.6-118** illustrate potential redevelopment over 20 years; exact amount, locations, and design of redevelopment may vary. It would likely happen incrementally (i.e., site by site) as property owners choose to develop their property and/or aggregate properties for larger redevelopments.

Like Alternative 2, specific height/bulk/scale impacts would include:

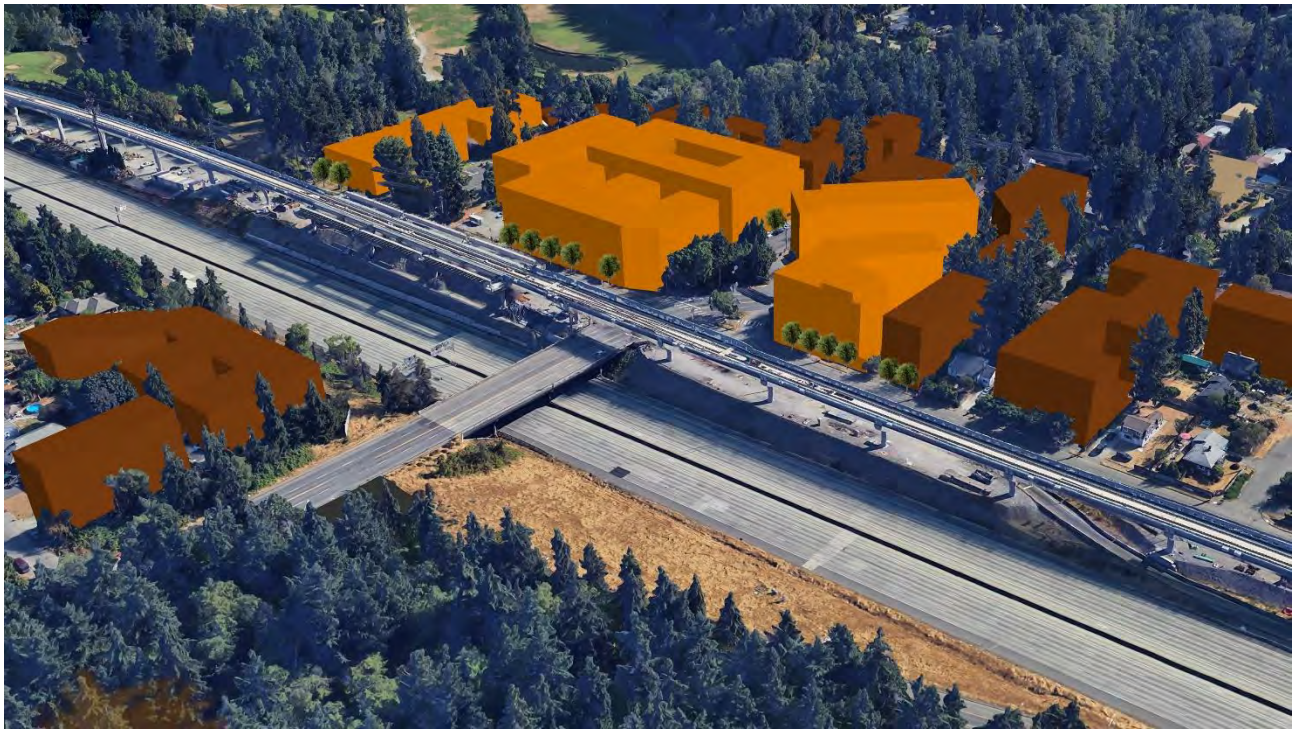
- **Urban design and active transportation: Intersite connectivity.** This challenge may be more pronounced than Alternative 2 as even greater intensities develop near the station without direct routes.
- **Street-level community building: Lack of focused public realm.** Similarly, with more areas expected to redevelop, this challenge may be more widespread as more parcels redevelop without a cohesive street/path network.
- **Street level community building: Affordable commercial space.** With even greater redevelopment expected, the potential displacement of small and BIPOC-owned businesses may impact cultural and social gathering spaces more than Alternative 2.

Exhibit 3.6-117. Proposed 130th/145th Station Area Allowed Building Heights—Alternative 5



Note: These model views illustrate proposed building height limits in proposed neighborhood centers and urban centers. Building envelopes would also be influenced by FAR, setback, and upper story step back regulations.
Source: MAKERS, 2023.

Exhibit 3.6-118. 130th Station Area Massing Illustration—Alternative 5



Note: This model illustrates potential redevelopment over the next 20 years and building massings that maximize allowed FAR and heights while adhering to setback and zone transition regulations. Possible NC redevelopment is shown in orange, MR in brown, and LR in beige. It is not intended to show exact locations of development but that market-driven, incremental redevelopment over time would occur.
Source: City of Seattle, 2023; MAKERS, 2023.

Transitions. Under Alternative 5, development of high-intensity buildings in the immediate vicinity of the 130th station area (proposed NC zone), as well as the larger proposed MR area, may create abrupt local transitions in scale between existing detached houses and new larger construction, even more so than Alternative 2. Over time, an evolution of the station area into more consistently intensely used land, combined with smaller scale development in surrounding low-rise zones would result in a more gradual transition. See **Exhibit 3.6-119**.

Views. Changes to views along the I-5 scenic corridor, which are mostly blocked because of noise walls and/or I-5 being below grade, would be similar to Alternative 2. More buildings would be visible on both sides of I-5, but they would be a minor part of the view.

Exhibit 3.6-119. Pinehurst Massing Illustration—Alternative 5



Note: This model illustrates potential redevelopment over the next 20 years and building massings that maximize allowed FAR and heights while adhering to setback and zone transition regulations. Possible NC redevelopment is shown in orange and LR in beige. It is not intended to show exact locations of development but that market-driven, incremental redevelopment over time would occur.
Source: City of Seattle, 2023; MAKERS, 2023.

Equity & Climate Vulnerability Considerations

Housing Type Variety and Choice

Alternative 5 combines the place types found in Alternatives 2-4 and therefore could provide the most housing type variety and choice amongst all the alternatives. The likely increase in variety would provide more options for people to stay in their community over a lifetime and across generations as their needs change. Housing configurations that cluster more units together on a site could provide more opportunities for intergenerational families to live near each other. Increasing housing type options across the city also increases the opportunities for people to live in parts of the city economically closed off to them ~~in~~ under Alternative 1.

Relationship to Active Transportation

Among all alternatives, Alternative 5 could increase density the most across the city, near transit, and near large parks. Nearby parks, commercial, and office areas provide locations where people can walk and roll for their work, shopping, play, and leisure needs. More people

living within a 10-minute walk from light rail and a 5-minute walk from frequent bus transit likely increases the number of people walking, rolling, and using transit. Such a change would help mitigate climate impacts and improve chances at social connectedness.

Relationship to Social Wellbeing & Sociability

Alternative 5, with the increase in middle housing types and variety throughout the city and fewer concentrated extremes of higher and lower density areas, would likely have overall positive impacts on social wellbeing and social interactions, similar to Alternative 3. Impacts described in Alternative 4's **Relationship to Social Wellbeing & Sociability** section related sociability along arterials would also pertain to Alternative 5, but perhaps to a lesser degree with development opportunities more dispersed in Alternative 5.

Climate Change

No additional impacts to climate change are anticipated under Alternative 5 above those described under the other action alternatives. Growth under Alternative 5 would be concentrated in centers and corridors, away from most hazards, with additional growth spread throughout the urban neighborhoods. Like Alternative 3, distributing more growth in urban neighborhoods could increase the potential for populations to be closer to hazards or affected by interruptions in access to their neighborhoods. Like the other action alternatives, Alternative 5 would include a new Environment and Climate Element with mitigation and adaptation strategies as well as policies regarding tree canopy protection or enhancement and critical area regulations. See also the discussion under **Impacts Common to All Alternatives**.

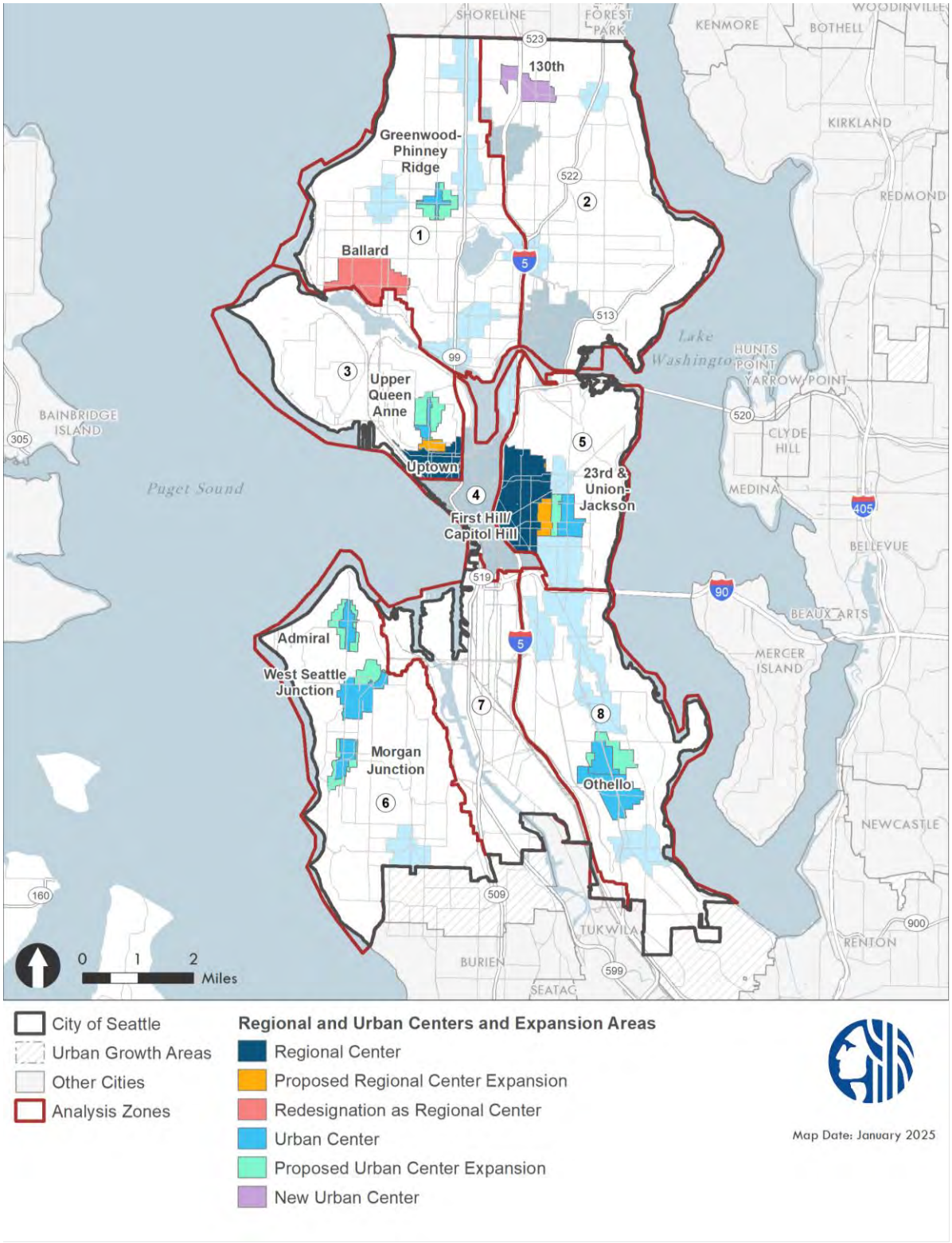
Impacts of Preferred Alternative

Note: The impacts analysis for the Preferred Alternative was added since the Draft EIS.

Land Use Patterns & Compatibility

The Preferred Alternative anticipates an increase in supply and diversity of housing across Seattle similar to Alternative 5. It includes the strategies for encouraging housing growth in the other action alternatives plus some additional changes to existing center boundaries and changes to place type designations beyond Alternative 5 (see **Exhibit 2.4-28**). The Preferred Alternative expands the boundaries of nine centers (the First Hill/Capitol Hill Regional Center, Uptown Regional Center and 23rd & Union Jackson, West Seattle Junction, Admiral, Greenwood-Phinney Ridge, Morgan Junction, Othello, and Upper Queen Anne Urban Centers), designates the NE 130th Street Station Area as a new urban center, and re-designates Ballard as a regional center (see **Exhibit 3.6-120**). 23rd & Union Jackson and Othello would also be split into two urban centers each (Central District, Judkins Park, Othello, and Graham) in addition to the expanded boundaries and South Park would be redesignated as a neighborhood center (previously an urban center under the other alternatives). The Preferred Alternative also includes 30 new neighborhood centers similar to Alternatives 2 and 5. However, boundaries of the neighborhood centers are defined in more detail under the Preferred Alternative, including five with notably expanded or shifted boundaries compared to Alternatives 2 and 5: North Magnolia, High Point, Mid Beacon Hill, Upper Fremont, and Hillman City (these were mostly a combination of neighborhood center and corridor place types with some urban neighborhood under Alternative 5).

Exhibit 3.6-120. Expanded, Redesignated, and New Regional and Urban Centers—Preferred



Note: See **Exhibit 2.1-1** in **Chapter 2** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under the other alternatives.
Source: City of Seattle, 2024; BERK, 2025.

Like Alternative 5, the Preferred Alternative studies total housing growth of 120,000 housing units (40,000 more than the No Action Alternative and 20,000 more than Alternatives 2, 3, or 4) to account for potential additional housing demand that could be met within the areas of change. As described under **Impacts Common to All Alternatives**, most new growth would still be focused within the centers currently characterized by higher densities, more compact building forms, and a more diverse mix of uses than other areas of the city. Housing growth within the centers would be slightly lower under the Preferred Alternative than the No Action Alternative but higher than Alternative 3.

Land use patterns and potential compatibility impacts within most of the centers would be similar to those described under **Impacts Common to All Alternatives**. The nine expanded center boundaries consist primarily of single-family residential areas neighboring mixed-use and commercial development nodes within the existing center boundaries. Over time, these areas would gradually convert to denser multifamily residential and mixed-use patterns of development. The Uptown Regional Center expansion area and expansion area in Squire Park (including First Hill/Capitol Hill, Central District, and Judkins Park) primarily consist of existing multifamily development—as a result, future land use patterns would likely be similar in scale and intensity to the No Action Alternative even if these areas redevelop with more mixed use. Adverse compatibility impacts at the periphery of most centers would be minimized under the Preferred Alternative as the abutting neighborhood center, corridor, and urban neighborhood areas redevelop (see also the **Transitions** section below).

Activity levels and activity units per acre would vary from the other alternatives as a result of the increased overall growth and change in center boundaries. Under the Preferred Alternative, the redesignated Ballard Regional Center would meet PSRC's Urban Regional Growth Center size and activity unit density criteria. University Community and Northgate would also meet PSRC's future activity unit threshold for Urban RGCs (like the other alternatives) as would Uptown which could result in redesignation from Metro to Urban RGC in the future. All urban centers would meet King County's minimum future density criteria for Countywide Centers (including, the split Othello and Graham centers and Rainier Beach). Green Lake, Lake City, and Madison-Miller would still be outside the size threshold. See **Exhibit 3.6-121**.

PSRC RGCs require a minimum density of 30 existing activity units and 85 planned activity units for Metro RGCs, 18 existing activity units and 45 planned activity units for Urban RGCs, and are expected to be between 320–640 acres in size (or larger if served by an internal, high-capacity transit system). Appendix 6 of the King County CPPs includes higher activity unit thresholds for Metro and Urban RGCs (60 existing/120 planned for Metro RGCs and 30 existing/60 planned for Urban RGCs). Per the CPPs, not meeting existing activity unit thresholds for existing centers (all of Seattle's Regional Centers except for Ballard under the Preferred Alternative) is not grounds for de-designation or re-designation by the Growth Management Planning Council.

King County countywide centers require an existing density of at least 18 activity units and planned density of at least 30 activity units and are expected to be between 160–500 acres in size.

See also **Section 3.7 Relationship to Plans, Policies, & Regulations**.

Exhibit 3.6-121. Future Activity Units (AU)—Preferred Alternative

	Draft EIS Analysis[3]		Preferred Alternative Analysis[4]			
Center	Existing AU/Ac.	Alt. 1 AU/Ac.	Existing AU/Ac.	Acres	2044 AU	2044 AU/Ac.
Regional Centers[1]						
Downtown	377.4	473.2	253.3	952	318,003	334.0
First Hill/Capitol Hill[2]	139.5	163.4	111.5	1,015	131,529	129.6
University Community	54.5	70.2	99.5	753	83,950	111.4
South Lake Union	236.7	344.1	275.7	340	125,946	370.6
Uptown[2]	131.3	161.3	81.1	389	39,574	101.9
Northgate	57.3	75.1	46.6	412	25,073	60.8
Ballard[2]	67.7	96.9	57.9	495	41,457	83.7
Hub Urban Centers[1]						
Bitter Lake Village	44.0	55.4	30.3	364	14,975	41.2
Fremont	71.9	88.1	68.3	214	17,331	80.8
Lake City	57.6	75.4	49.2	142	9,453	66.5
Mt Baker	36.0	47.4	28.7	491	19,679	40.1
West Seattle Junction[2]	70.4	100.2	47.9	367	24,822	67.6
Residential Urban Centers[1]						
130th Street[2]	18.4	20.7	17.3	217	7,210	33.2
23rd & Union-Jackson[2]	38.9	46.5	—	—	—	—
Central District	—	—	31.6	232	10,345	44.6
Judkins Park			39.3	467	21,743	46.5
Admiral[2]	49.2	60.4	29.9	219	8,287	37.8
Aurora-Licton Springs	44.1	51.4	33.1	327	13,155	40.2
Columbia City	33.9	46.1	36.7	335	16,692	49.9
Crown Hill	25.3	31.4	26.6	271	9,004	33.2
Eastlake	70.2	82.0	65.5	199	14,930	74.9
Green Lake	70.6	87.4	59.7	109	7,683	70.7
Greenwood-Phinney Ridge[2]	84.5	101.6	42.3	197	10,900	55.3
Madison-Miller	65.3	85.1	55.5	145	10,339	71.2
Morgan Junction[2]	34.1	41.6	26.8	198	6,940	35.1
North Beacon Hill	28.1	34.5	31.8	267	9,963	37.3
Othello[2]	23.7	29.0	—	—	—	—
Graham	—	—	18.3	291	9,328	32.0
Othello			33.4	353	12,632	35.8
Rainier Beach	23.0	26.0	19.9	346	10,553	30.5
Roosevelt	61.4	81.2	55.5	170	12,391	72.8
Upper Queen Anne[2]	89.5	110.5	39.0	208	9,763	46.9
Wallingford	42.2	51.5	40.6	258	12,349	47.9
Westwood-Highland Park	27.9	32.6	25.8	275	8,302	30.2

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 the other alternatives.

2 Proposed new center, redesignated center, or boundary expansion. Ballard would be redesignated as a regional center, a new urban center created at 130th Street, 23rd & Union Jackson split into two urban centers (Central District and Judkins Park), and Othello split into two urban centers (Othello, and Graham).
3 For the Draft EIS analysis, existing housing units and jobs were estimated based on 2022 housing data from OFM, summarized job data from PSRC, and the existing center boundaries (e.g., these are not based on site level data and are used as estimates for comparing the alternatives only). The Draft EIS No Action Alternative added growth to these existing numbers and assumed an average household size of 2.05 across all centers per the King County Growth Management Planning Council to determine future activity units.
4 The Preferred Alternative uses updated and more detailed information to calculate existing and future activity units per acre for each center than Alternatives 1–5. Existing activity units per acre by center are based on OFM's 2023 SAEP April 1 census block estimate of total population and PSRC's 2023 estimate of all jobs (estimated by starting with ESD Q1 Covered Employment and estimating the remaining jobs not covered by unemployment insurance) within the revised center boundaries of the Preferred Alternative. Future 2044 population by center was calculated using OFM's 2023 housing unit estimate, additional housing unit permits issued between April 1, 2023 and June 1, 2024 (since the 2023 OFM estimate), a citywide household occupancy rate of 93%, estimated existing people per household by center (per OFM's 2023 household and population estimates), and housing unit growth targets. Future 2044 jobs by center were calculated using PSRC's 2023 covered employment estimate and job growth targets. Future 2044 activity units per acre for each center are based on the combined estimated 2044 population and jobs and acres within each center (including revised center boundaries under the Preferred Alternative). See **Appendix B**.
Note: Activity units (AU) is the sum of residential population and jobs. Highlighted hub and residential urban centers 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: OFM SAEP April 1 census block estimates, 2022 and 2023; PSRC, 2023; City of Seattle, 2024; BERK, 2024.

Under the Preferred Alternative, urban neighborhood areas would accommodate the second highest share of anticipated housing growth behind regional centers (see **Chapter 2**). Urban neighborhood areas would accommodate a similar share of housing growth as Alternative 3 (20% under the Preferred Alternative and 22% under Alternative 3) but an overall slightly higher amount of housing growth as a result of higher studied growth overall. More than half (58%) of the additional new housing growth in urban neighborhood areas would be directed into areas 1 and 2. A small number of jobs and commercial space would shift from the regional and urban centers towards urban neighborhood areas to reflect local demand consistent with the distribution of new housing. The Preferred Alternative also allows more flexibility for commercial space in these areas (like Alternative 3) to support the development of neighborhoods where more people can walk to everyday needs.

A little less than half (45%) of housing growth in neighborhood centers would be directed into those with low displacement risk in areas 1 and 2 and about 21% would be directed into neighborhood centers with high displacement risk (generally in areas 6, 7, and 8). Housing growth in the corridors would be in between Alternatives 4 and 5 but spread over a smaller share of land area than Alternative 4 or 5—this growth would be focused in Area 2 followed by areas 1, 8, 5, and 6. Land use patterns and potential adverse compatibility impacts within the new place types would be similar to those described under Alternatives 2, 3, and 4.

Overall, Area 1 would receive the greatest overall share of new housing growth under the Preferred Alternative (21%), followed by Area 2 (20%) and Area 4 (16%). The Preferred Alternative distributes growth similar to Alternative 5, although the distribution is slightly

different across the neighborhood center, corridor, and urban neighborhood place types given varied boundaries. This is likely to result in a denser land use pattern citywide with focused growth in the centers and smaller mixed-use nodes in the new neighborhood centers and near corridors with frequent transit. Impacts would be mitigated through application of the City's development regulations (including shoreline regulations) and design review process.

Urban Form

Height, Bulk, & Scale

The Preferred Alternative would have similar impacts as Alternative 5 (see **Exhibit 3.6-113**), except urban neighborhood areas (i.e., Neighborhood Residential and Lowrise zones) would allow 32 feet instead of 30. This additional 2 feet makes 3-story development more feasible and can generally improve aesthetics by accommodating a greater roof pitch or roof form variations, as well as allowing for taller ceiling heights, making units more livable. It would not create negative height, bulk, or scale impacts.

The Preferred Alternative includes several place type boundary changes, none of which create greater impacts than Alternative 5. These changes include the following:

- The zoning boundaries for neighborhood centers are more defined under the Preferred Alternative, but their proposed height limits and bulk standards are no greater than Alternative 5.
- The Preferred Alternative expands the First Hill/Capitol Hill Regional Center and 23rd and Union-Jackson (Central District) Urban Center. This simplifies the Center boundaries and connects similarly scaled urban areas. Proposed zoning in these areas has no taller height limits than Alternative 5.
- The Preferred Alternative redesignates South Park as a neighborhood center, while Alternative 5 showed South Park as an urban center. Zoning proposals show modest upzones consistent with a neighborhood center, with no greater height/bulk/scale impacts than Alternative 5.

Transitions

The Preferred Alternative's impact on transitions between and within zones is similar to Alternative 5. Neighborhood centers and corridors (generally narrower areas than in Alternative 5) will likely see redevelopment that may have stark contrasts in building scale as compared to existing. But as with Alternative 5, these are expected as part of a gradual transition into typical heights, bulks, and scales of urban centers and neighborhoods.

The Preferred Alternative's proposed zoning makes several development standards more consistent between Neighborhood Residential and Lowrise zones—and amongst their various building types, including setbacks, maximum façade length, design standards, FAR bonus for

stacked flats, amenity area, stormwater features in setbacks, and separations between buildings.

Tree Canopy

Overall, the Preferred Alternative's impacts to tree canopy would be similar to Alternative 5. Two zoning proposals clarified in the Preferred Alternative (see **Appendix J Proposed Legislation**) may improve chances at increasing tree canopy:

- The Preferred Alternative's proposed reduction in minimum spacing between buildings in Neighborhood Residential and Lowrise zones from 10 feet to 6 feet may increase opportunities for consolidated open space that is large enough for plantings/trees, rather than narrow, unusable strips of land between buildings.
- The slight reduction in parking space minimum width from 8.5 feet to 8 feet will also improve the chances at larger areas for plantings and tree roots.

Shadows

Shadow impacts would be no greater than Alternative 5. These include modestly increased potential for shadows on public rights-of-way and parks in expanded regional and urban centers, neighborhood centers, and along corridors.

Views

Like Alternative 5, view impacts are expected to scenic routes, view corridors, and landmark views. SEPA-protected views may continue to be protected through project-scale SEPA analysis. Shoreline views are unlikely to be blocked but may change—and potentially become more interesting—with redevelopment.

130th/145th Station Area

Land Use Patterns & Compatibility

Under the Preferred Alternative, a new urban center would be designated on both the west and east sides of I-5 at the Sound Transit light rail station, with zoning including Low-rise Residential (LR1 and LR3), Midrise Multifamily (MR2), and Neighborhood Commercial (NC2). This area would include an existing commercial node around Pinehurst and an expanded residential mixed-use area closer to the station. Housing and job growth in the new 130th Street Urban Center would be similar to but slightly less than Alternative 5 with a little less housing growth and almost the same job growth.

Overall growth in the 145th Station Area would be less than the No Action Alternative. With a similar amount of housing but about half the expected job growth. Zoning would include Low-rise Residential (LR3) and Neighborhood Commercial (NC2 and NC3). Like Alternative 5,

buildings would be denser than Alternative 2 with more mixed-use buildings and a wider variety of housing types allowed.

Over time, the station areas would likely redevelop into mixed-use nodes. Growth would increase activity unit density from 17.3 (existing) to 33.2 around NE 130th Street. Like Alternative 5, this increased density around NE 130th Street would represent a potential adverse land use impact of future growth in the station area. Growth would also increase activity unit density from 39.2 (existing) to 69.6 around 15th and 145th, only slightly higher than the No Action Alternative (64.9; see **Exhibit 3.6-84**). However, growth would be concentrated over a smaller area (53 acres versus 65 acres) with slightly denser mixed-use buildings and a wider variety of housing types which is a potential adverse land use impact of future growth in the station area. Impacts in both station areas would be mitigated through application of the City's development regulations and design review process. In addition, increased density citywide would lessen potential adverse compatibility impacts on the periphery of all new urban centers and neighborhood centers, including the station areas (see also the **Transitions** section below).

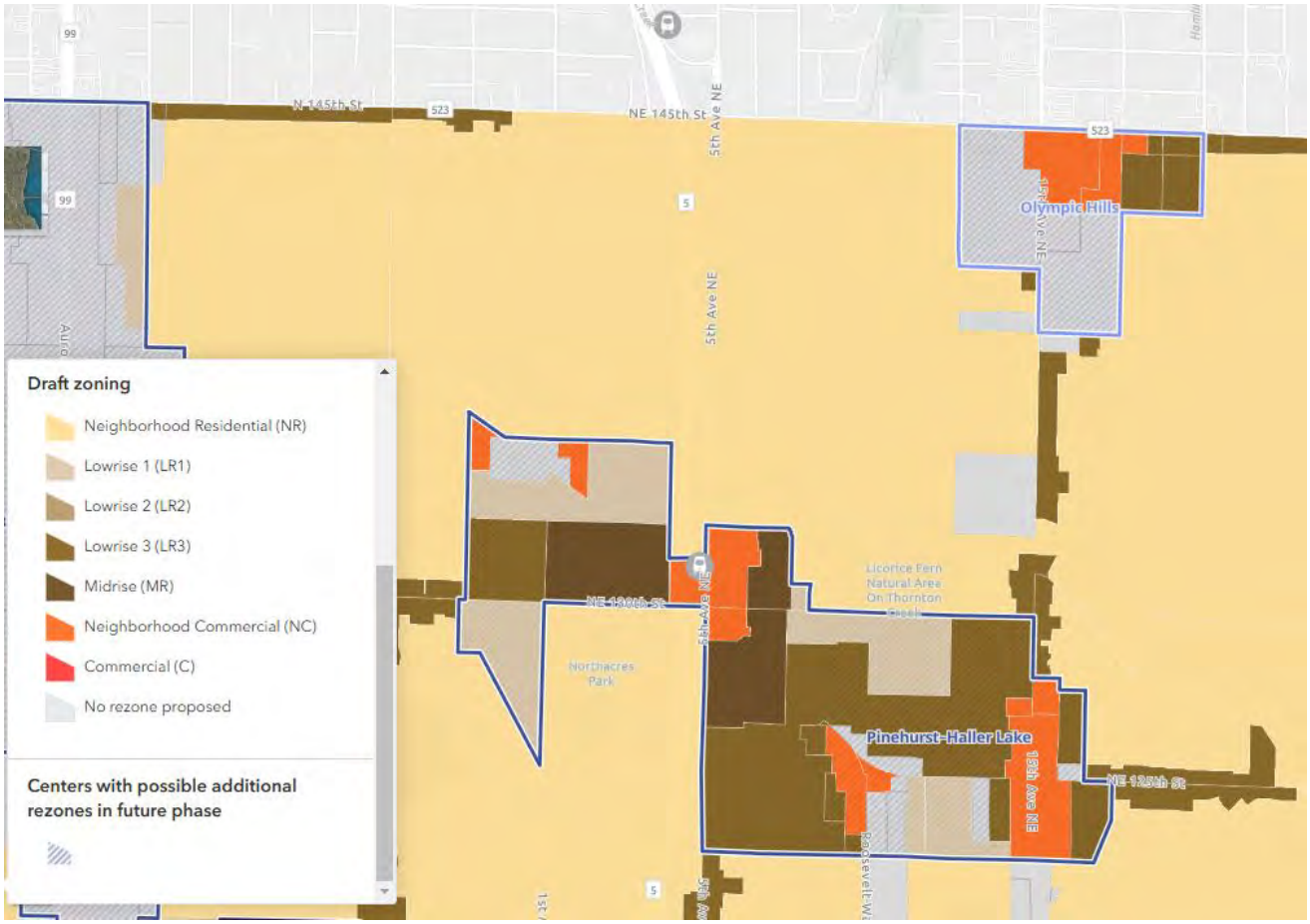
See **Exhibit 3.6-122** and **Exhibit 3.6-123**.

Exhibit 3.6-122. Station Area Share of Targets, 2024-2044—Preferred Alternative

Location	Place Type[1]	Acres	New Housing Units	New Jobs	Activity Units (Existing)/Ac.[2]	Activity Units (Future)/Ac.[2]
NE 130th Street	Urban Center	217	1,500	360	17.3	33.2
15th & 145th[3]	Neighborhood Center	53	652	298	39.2	69.6

1 See **Exhibit 2.1-1** for a crosswalk of existing place types (existing and Alternative 1) versus proposed place type names under Alternatives 25. The 130th Street and Pinehurst Neighborhood Centers from Alternative 2 are both part of the 130th Street Urban Center in Alternative 5.
2 The Preferred Alternative uses updated and more detailed information to calculate existing and future activity units per acre for each center than Alternatives 1–5. Existing activity units per acre by center are based on OFM's 2023 SAEP April 1 census block estimate of total population and PSRC's 2023 estimate of all jobs (estimated by starting with ESD Q1 Covered Employment and estimating the remaining jobs not covered by unemployment insurance) within the revised center boundaries of the Preferred Alternative. Future 2044 population by center was calculated using OFM's 2023 housing unit estimate, additional housing unit permits issued between April 1, 2023 and June 1, 2024 (since the 2023 OFM estimate), a citywide household occupancy rate of 93%, estimated existing people per household by center (per OFM's 2023 household and population estimates), and housing unit growth targets. Future 2044 jobs by center were calculated using PSRC's 2023 covered employment estimate and job growth targets. Future 2044 activity units per acre for each center are based on the combined estimated 2044 population and jobs and acres within each center (including revised center boundaries under the Preferred Alternative). See **Appendix B**.
3 Renamed Olympic Hills under the Preferred Alternative.
Source: OFM, 2023 (estimates of 2023 housing, households, household population, and group quarter population are from OFM's SAEP April 1 census block estimates); PSRC, 2023; City of Seattle, 2024; BERK, 2024.

Exhibit 3.6-123. 130th/145th Station Area Zoning Concepts—Preferred Alternative



Note: 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 the other alternatives.
Source: City of Seattle, 2024.

Urban Form

Height, bulk, and scale. Under the Preferred Alternative, zoning proposals nearly match Alternative 5, with just one area along Roosevelt Way N at 1st Ave NE remaining at NC1-55 instead of Alternative 5's proposed NC2-55. This means that the height, bulk, and scale impacts are very similar to Alternative 5's, with that area surrounding the 130th light rail station transitioning from 1- and 2-story buildings to 6- to 8-story buildings over time. Likewise, the 145th station area would likely redevelop with 7- to 8-story buildings. Other areas may transition from 1- and 2-story buildings to 3- to 5-story buildings. **Exhibit 3.6-117** and **Exhibit 3.6-118** illustrate potential redevelopment over 20 years; exact amount, locations, and design of redevelopment may vary. It would likely happen incrementally (i.e., site by site) as property owners choose to develop their property and/or aggregate properties for larger redevelopments.

Like Alternatives 2 and 5, specific height/bulk/scale impacts would include:

- **Urban design and active transportation: Intersite connectivity.** The block bounded by 5th Ave NE, NE 130th St, 8th Ave NE, and Jackson Park is approximately 660 feet by 690 feet and currently has no through access; NE 131st Place is a private access drive and 8th Ct NE is a short dead-end right-of-way. With redevelopment, the lack of an existing finer-grained and connected network of streets means that redevelopment, without requirements for greater connectivity, could result in development that is fractured and doesn't have great connections to existing streets and the light rail station.
- **Street-level community building: Lack of focused public realm.** Because of the limited street grid, piecemeal redevelopment could result in individual, unrelated, disconnected developments lacking a cohesive orientation toward public streets, a focused public realm, or opportunities for shared social gathering. Building entries could be hidden or facing different directions within a block accessed by long, private driveways.
- **Street level community building: Affordable commercial space.** 15th Ave NE, both in the 145th station area and Pinehurst, as well as NE 125th St at 15th Ave NE and Roosevelt Way NE south of NE 125th St, would likely see greater levels of activity, enlivening the street level experience. However, many small commercial spaces currently exist in strip malls or in adapted houses in these areas. With redevelopment, maintaining affordable commercial space in the area for local and BIPOC-owned businesses may be challenging, impacting the social and cultural ties to these neighborhood centers.

Transitions. Like Alternative 5, development under the Preferred Alternative may create short-term abrupt local transitions in scale, but will likely evolve over time into more consistent scales with gradual transitions into Lowrise and Neighborhood Residential zones.

Views. Changes to views along the I-5 scenic corridor, which are mostly blocked because of noise walls and/or I-5 being below grade, would be similar to Alternative 2 and Alternative 5. More buildings would be visible on both sides of I-5, but they would be a minor part of the view.

Equity & Climate Vulnerability Considerations

Housing Type Variety and Choice

The Preferred Alternative combines the place types found in Alternatives 2-4 and could therefore provide more housing type variety and choice. Like Alternative 5, the likely increase in variety would provide more options for people to stay in their community over a lifetime and across generations as their needs change. Housing configurations that cluster more units together on a site could provide more opportunities for intergenerational families to live near each other. Increasing housing type options across the city also increases the opportunities for people to live in parts of the city economically closed off to them under Alternative 1.

Relationship to Active Transportation

Similar to Alternative 5, the Preferred Alternative could increase density across the city, near transit, near neighborhood commercial centers, and near large parks. Nearby parks,

commercial, and office areas provide locations where people can walk and roll for their work, shopping, play, and leisure needs. More people living within a 10-minute walk from light rail and a 5-minute walk from frequent bus transit likely increases the number of people walking, rolling, and using transit. Such a change would help mitigate climate impacts and improve chances for social connection.

Relationship to Social Wellbeing & Sociability

Impacts on social wellbeing and social interactions under the Preferred Alternative would be similar to those described under Alternative 5. The increase in middle housing types and variety throughout the city and fewer concentrated extremes of higher and lower density areas would likely have overall positive impacts (similar to Alternatives 3 and 5). Likewise, impacts along arterials would be similar to those described under Alternative 4, but with narrower bands of higher intensity zoning along the arterials, a greater proportion of new development may occur immediately along inhospitable arterials—where social interactions can be inhibited by traffic's impact on sense of safety, air quality, and noise—rather than a block or two away where the benefits of transit access are gained without the negative impacts. That said, like Alternative 5, the Preferred Alternative's greater dispersion of development opportunities throughout the city means the impacts along arterials would likely be less than Alternative 4.

Climate Change

Impacts to climate change under the Preferred Alternative would be similar to those described for Alternative 5. Growth under the Preferred Alternative would be concentrated in centers and corridors, away from most hazards, with additional growth spread throughout the urban neighborhoods. Like Alternative 5, distributing more growth in urban neighborhoods could increase the potential for populations to be closer to hazards or affected by interruptions in access to their neighborhoods. Like the other action alternatives, the Preferred Alternative would include a new Environment and Climate Element with mitigation and adaptation strategies as well as policies regarding tree canopy protection or enhancement and critical area regulations. See also the discussion under **Impacts Common to All Alternatives**.

Summary of Impacts

Exhibit 3.6-124, **Exhibit 3.6-125**, and the following text summarize and compare adverse land use impacts citywide and within the 130th/145th station areas under each alternative.

Citywide

Exhibit 3.6-124. Summary of Land Use and Urban Form Impacts by Alternative—Citywide

Impact	No Action	Alt. 2	Alt. 3	Alt. 4	Alt. 5	Preferred
Land Use Patterns	▽	▼	▽	▼	▼	▼
Land Use Compatibility	▽	▼	▼	▼	▽	▽
Height, Bulk, & Scale	▽	▼	▼	▼	▼	▼
Transitions	▼	▽	▲	△	▲	▲
Tree Canopy	▽	▽	▼	▼	▼	▼
Shadows	▽	▼	▽	▽	▼	▼
Views	—	—	—	▽	▽	▽

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative was added to this exhibit since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.
Sources: BERK, 2024~~3~~; MAKERS, 2024~~3~~.

Land use patterns. Growth under all alternatives would increase activity levels and land use intensities across the city resulting in likely adverse impacts to land use patterns. All alternatives focus most future growth into centers currently characterized by higher densities, more compact building forms, and a more diverse mix of uses than other areas of the city. Land use patterns in the neighborhood centers and corridors would intensify more under Alternatives 2 and 4, respectively, than under the No Action Alternative. Under Alternative 3, overall land use patterns would become denser over time within the Neighborhood Residential zones but most of this development would continue to be residential in nature and would be more spread throughout the analysis areas than the other action alternatives. Alternative 5 and the Preferred Alternative includes the most growth overall and incorporates elements of the other action alternatives—the intensity of land use patterns would shift most dramatically under Alternative 5 and the Preferred Alternative as activity levels increase over time.

Land use compatibility. Future growth under all alternatives is likely to increase the frequency of different land use types locating close to one another, and similarly likely to increase the frequency of land use patterns that contain mixes of land uses with differing levels of intensity, both within the centers and, to a varying extent, in other areas of the city. Land use incompatibilities under the No Action Alternative would be similar to those observed today but could become more severe over time with continuing trends. Under the action alternatives, denser and more mixed-use land use patterns in the new place types could result in localized

land use compatibility impacts within the place types or on the border with adjacent residential areas. All neighborhood centers, for instance, already contain areas zoned for commercial or mixed-use development but additional jobs and commercial space could increase more quickly in these areas due to the local demand from new housing. However, adverse compatibility impacts at the periphery of most existing centers would also be minimized as the new place types redevelop with denser development—this would be most noticeable over the long term under Alternative 5 and the Preferred Alternative as the abutting neighborhood center, corridors, and urban neighborhood areas redevelop. See also the summary of transitions below.

Height, bulk, and scale. Height, bulk, and scale impacts would likely occur under all alternatives as development occurs. Future growth and development directed into existing centers under all alternatives would result in a moderate amount of additional height and bulk in these commercial and mixed-use nodes generally consistent with that experienced during growth over the last 20 years. Under the action alternatives, building heights, bulk, and/or scale in the new place types would likely increase with new development. These impacts would be more pronounced in the neighborhood centers and corridors where height limits would be increased up to 5-7 stories. 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. The alternatives vary in the likelihood of localized impacts (Alternative 1, 2, and to some extent 4) versus more distributed impacts (Alternative 3 and 5 and the Preferred Alternative).

Transitions. Continued infill development in established centers and villages under the No Action Alternative would likely create increasingly stark contrasts with surrounding lower-scale areas. The new place types introduced under the action alternatives would generally reduce existing contrasts between centers (that see widespread development of large buildings) and surrounding areas (with broad areas that see minimal development). Over time, edges under Alternatives 3 and 5 and the Preferred Alternative would be softened the most as feathered gradations of intensity fill in around nodes of activity, neighborhood amenities, and existing centers.

Tree canopy. Bulkier development under all alternatives would likely displace some trees on private property, especially in residential zones. At the same time, the number of street trees may increase where they are required with redevelopment. Private property may see a greater loss of existing tree canopy under the action alternatives with more widespread redevelopment. For example, the increase in size and number of buildings allowed on a lot in Alternatives 3 and 5 and the Preferred Alternative will likely decrease the amount of space available for trees on neighborhood residential lots. See **Section 3.3.2** regarding differences parcel acres developed. More parcel acres developed would occur in the Neighborhood Residential place type under Alternatives 3 and the Preferred Alternative, but more would occur under Alternative 3 between the two alternatives.

Shadows. Under any alternative, taller and often bulkier redevelopment will cast longer and/or wider shadows than existing development. Building shadows can be considered positive for

climate adaptation to reduce summertime heat but can be negative for human health and wellbeing (especially during winter) and the health of existing trees if accustomed to full sun. Over time, increased height limits in the neighborhood centers under Alternatives 2, 4, and 5 and the Preferred Alternative would likely result in longer shadows over a greater portion of the day compared to the other alternatives and may be most impactful where shadows would fall downhill or on east-west oriented neighborhood main streets.

Views. Future development under Alternatives 1, 2, and 3 would present limited disruptions to public views. Growth would continue to concentrate in centers (which tend to contain few viewpoints). Most public viewpoints are outside the neighborhood centers in Alternative 2. There would be no height increase for market-rate development and a minimal height increase for affordable housing in the Neighborhood Residential zones under Alternative 3. Most of the protected viewpoints and scenic routes are within or adjacent to the more intense development expected in the corridor place type under Alternatives 4 and 5 and the Preferred Alternative, and a few are in or near the expanded regional and urban centers in Alternative 5 and the Preferred Alternative. Development under these alternatives may disrupt views in more places.

130th/145th Station Areas

Exhibit 3.6-125. Summary of Land Use and Urban Form Impacts by Alternative—130th/145th Station Areas

Impact	No Action	Alt. 2	Alt. 5	Preferred
Land Use Patterns	—	▼	▼	▼
Land Use Compatibility	▼	▼	▽	▽
Height, Bulk, & Scale	▽	▼	▼	▼
Transitions	▼	▽	▲	▲
Tree Canopy	▽	▽	▼	▼
Shadows	▽	▼	▼	▼
Views	—	—	▽	▽

Note: Impacts are considered either unavoidable adverse (▼▼), adverse but able to be mitigated (▼), impact but less than adverse (▽), limited or none (—), moderately positive (△), or positive (▲). The Preferred Alternative was added to this exhibit since the Draft EIS—no changes were made to the impact summary for Alternatives 1–5.
Sources: BERK, 2023; MAKERS, 2023.

Land use patterns and compatibility. No adverse impacts to land use patterns are expected in the station areas under the No Action Alternative. Under this alternative, no new areas would be designated for mixed-use or higher density and building types outside existing commercial zoning would remain primarily single purpose with some multi-family uses near the 145th BRT station. Few parcels around 130th would be likely to fully redevelop under the No Action Alternative, though more may see additions (e.g., ADUs) and rebuilds consistent with the existing land use patterns. However, the area may still see increased activity under the No

Action Alternative over time as people seek to access the light rail station which could result in compatibility impacts with surrounding lower density residential development. Greater change would occur in the areas currently zoned for more intense development, including the 145th BRT station area and Pinehurst area.

Under Alternatives 2 and 5 and the Preferred Alternative, both station areas would likely redevelop into mixed-use nodes with more growth at greater heights clustered in the newly designated neighborhood centers (Alternatives 2 and 5 and the Preferred Alternative) and urban center (Alternative 5 and the Preferred Alternative). Activity levels and land use intensities would increase resulting in greater impacts to land use patterns than the No Action Alternative. Compatibility impacts would be similar to those described citywide for neighborhood and urban centers.

Height, bulk, and scale. Changes to height, bulk, and scale would be limited under the No Action Alternative and primarily within the 145th station area. Under Alternatives 2 and 5 and the Preferred Alternative, the station areas could see extensive changes to height, bulk, and scale as a result of proposed zoning capacity increases combined with proximity to the new light rail station. Heights could reach up to 7-8 stories immediately adjacent to the 130th light rail station and in the core of the 145th station area. 15th Ave NE (both in the 145th station area and Pinehurst) as well as NE 125th St at 15th Ave NE and Roosevelt Way NE south of NE 125th St would likely see greater levels of activity, enlivening the street level experience. However, many small commercial spaces currently exist in strip malls or in adapted houses in these areas.

Under all alternatives, large superblocks (longer than 600 feet) lacking a connected internal path or street network also mean that direct routes to access the station will be challenging without regulations to encourage or require through connections with redevelopment. Redevelopment at the light rail station would occur in a physically bifurcated, uncomfortable human environment (at 5th Ave NE, Roosevelt Way, and I-5) and could miss an opportunity to celebrate and activate the station entry.

Transitions. Transitions impacts in the station areas would be similar to those described citywide for the No Action Alternative and Alternatives 2 and 5 and the Preferred Alternative. Under Alternatives 2 and 5 and the Preferred Alternative, development of high-intensity buildings in the immediate vicinity of the 130th station area may create abrupt local transitions in scale between existing detached houses and new larger construction. Over time, an evolution of the station area into more consistently intensely used land, combined with smaller scale redevelopment in surrounding low-rise zones, would likely soften these transitions.

Tree canopy. Numerous evergreens, steep slopes, Thornton Creek, and environmentally critical areas near the 130th Station Area make development here unique, and perhaps more constrained, than many other Seattle areas. Existing large evergreen trees make residential areas feel set in hillside woods. Tree preservation could impact development capacity, and redevelopment with a loss of existing trees would have a noticeable effect on the human experience and sense of being set in nature. Under all alternatives, any redevelopment would

fill gaps in street trees along the frontage. Large-scale redevelopment under Alternatives 2 and 5 and the Preferred Alternative in the station areas (more so under Alternative 5 and the Preferred Alternative) would significantly impact the existing tree canopy.

Shadows. Under all alternatives, the existing tall evergreens, combined with steep slopes, significantly shade many residential areas. Shadow impacts from increases in building heights would be less noticeable in these residential areas because of those existing shadows. The north-south orientation of 15th Ave NE, as well as to a lesser extent the diagonal orientation of Roosevelt Way NE, allows for greater solar access for longer hours throughout the year, even with increases in building heights. Under Alternatives 2 and 5 and the Preferred Alternative, increased height limits could result in increased shadows on Jackson Park. However, the human experience of the park would not significantly change as tall evergreens already shade the park boundaries.

Views. Impacts to public views in the station areas under the No Action Alternative and Alternative 2 would be limited. Increased height limits near the 130th light rail station under Alternatives 2 and 5 and the Preferred Alternative could have limited impacts on the adjacent I-5 scenic corridor.

3.6.3 Mitigation Measures

Incorporated Plan Features

All alternatives would focus most future growth into the existing urban centers and villages. Compatibility challenges would not be an uncommon or new phenomenon in these areas and can be avoided or mitigated by continuing to implement the Land Use Code (Title 23). New place types and/or expanded housing options in existing Neighborhood Residential zones proposed as part of the action alternatives would introduce localized land use and urban form impacts where newer development is of greater height and intensity than existing development. 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. Overall, the new place types would create smoother and more varied transitions in intensity throughout the city (especially adjacent to urban center and village boundaries).

Existing building and land use policies, programs, and codes that promote compact building forms and energy efficient, low-carbon, green building techniques—such as the City's green building permit incentives for private development and the Sustainable Buildings and Sites policy for City-development—would continue to apply under all alternatives as discussed below under **Regulations & Commitments**. See also **Appendix J** which includes a description of proposed zoning code changes.

Under the action alternatives, the City could also update Comprehensive Plan policies to further address the effects of climate change, particularly for communities more vulnerable to the

effects of climate stress than others or located in areas in the city that may experience larger effects from climate change (including "heat islands" with more pavement and fewer trees, floodplain and landslide hazard areas, and areas with limited access to transit). For example, the action alternatives focus additional residential growth in areas 1, 2, and 6 which have relatively high levels of existing tree canopy cover. Required frontage improvements could increase the number of street trees with redevelopment, though more and bulkier development under all alternatives would likely displace some trees on private property and reduce tree canopy coverage overall. Potential mitigation measures to minimize tree canopy loss are described in **Section 3.3 Plants & Animals** and could include shared open space (see **Other Potential Mitigation Measures** below) or adding open space requirements in Neighborhood Residential zones (see also **Section 3.11 Public Services**).

Regulations & Commitments

Seattle's municipal code contains regulations for land use and urban form. Below is a summary of these regulations as well as existing supporting policies and programs which would serve to mitigate impacts associated with the alternatives.

SEPA Policies. Title 25 of the Seattle Municipal Code contains policies governing the issues to be addressed during development review under the State Environmental Policy Act (SEPA). SMC 25.05.675 contains policies related to specific environmental issues, including land use compatibility, noise, height, bulk, and scale, shadows, and views.

Development Regulations. The Seattle Municipal Code contains zoning and development regulations for the city. These development regulations contain provisions governing the design of buildings, site planning, restrictions within the shoreline jurisdiction, and provisions to minimize land use incompatibilities and impacts associated with height, bulk, and scale. Each zone contains unique provisions for urban design such as setbacks, upper-story setbacks, open space requirements, building height, FAR, screening, and landscaping, etc. They also contain standards for landscaping, tree protection, and stormwater which support the retention and planting of trees and vegetation.

Seattle Design Review Program. The Seattle Design Review Program provides oversight of private development projects in Seattle that meet certain criteria in terms of development size or where a departure from a development standard is requested. As discussed above, the City is currently updating its Design Review program to streamline the process and be consistent with HB 1293 (see **Design Review** under **Major Land Use Policy Changes Recently Adopted or Currently Under Consideration**). Design Review Boards are currently designated for eight areas of the city; each board is responsible for reviewing larger development projects in their defined area for compliance with Seattle's adopted Design Guidelines and recommending design changes to make projects more consistent with the guidelines. Smaller projects are currently reviewed administratively. The Design Guidelines define desirable qualities with regard to architecture, urban design, and public space, and the overall goal of the program is to encourage excellence in the design of new commercial and multi-family development in Seattle.

In addition to citywide standards, several sets of neighborhood-specific design guidelines currently supplement the Citywide and Downtown design guidelines.

Design Standards. Projects below the threshold for Design Review are subject to more prescriptive design standard regulations. These regulations are intended to ensure that smaller projects still meet the City's design objectives without imposing a level of delay and uncertainty that might be inappropriate for small projects.

Streets Illustrated, Seattle's Right-of-Way Improvements Manual. Streets Illustrated establishes and documents the policies, procedures, and practices for how the City manages physical improvements in the street right-of-way. It attempts to provide a comprehensive resource for all procedures, standards, and guidelines affecting physical changes in the street right-of-way. The manual also designates streets throughout Seattle for their modal priorities and purpose in their context, provides design guidance and standards to be implemented with redevelopment, and guides street tree selection and provision.

Green Building Incentives. The City's green building incentives aim to create more efficient buildings that center around clean electric energy, water, and resource conservation with a focus on human health. Projects can gain additional height, floor area, or a faster building permit in exchange for meeting specific green building goals and certification. Incentives include:

- *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.
- *Green Building Standard:* Gives additional development capacity in specific zones in exchange for meeting green building requirements.
- *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.
- *2030 Challenge:* Offers additional height, FAR, and Design Review departure requests for projects that meet the 2030 Challenge.
- *Innovation Advisory Committee:* This group of experts reviews energy efficient proposals not covered in the technical codes.

Sustainable Buildings and Sites Policy. The City's Sustainable Buildings and Sites Policy for municipal facilities aims to maximize the environmental quality, economic vitality, and social health of the city through the design, construction, operation, maintenance, renovation, and decommissioning of City-owned buildings and sites. Sustainable buildings and sites support overall City objectives by making efficient use of energy, water, and material resources; reducing climate change; minimizing pollution and hazardous materials; creating healthy indoor environments; reinforcing natural systems; providing habitat; creating vibrant spaces for people; and contributing to Seattle's neighborhoods. The Policy sets the following goals for City-owned properties:

- New construction and major renovations 5,000 ft^2 or greater must meet LEED Gold as well as key performance requirements for energy and water efficiency, waste diversion, and bicycle facilities.
- Tenant Improvements 5,000 ft^2 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.
- 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.
- All new and existing sites projects shall follow best management practices.

Other Potential Mitigation Measures

Although not required to address identified impacts, the City could pursue the following kinds of actions if it wishes to address possible future land use and urban form conditions.

Urban Form

In addition to the changes to policies and regulations described in **Chapter 2** relevant to urban form (development standards for balconies, roofs, tree protection, ground floor open space, shared open space, reduced residential parking and more), the City could further expand or extend the concepts as follows:

Changes to Development Standards. Changes to development standards such as updated design standards, allowances for porches and balconies, and bonuses for pitched roofs could improve the design of future development and mitigate the impact of new buildings.

Trees on private property. Options for mitigating potential tree loss in Neighborhood residential zones include updating existing requirements for planting trees on private property.

Funding for Trees. Invest in efforts to plant, maintain, and preserve of trees such as:

- Increasing funding to maintain and steward City-owned trees.
- Develop a tree stewardship program to provide expertise to residents on the care and maintenance of their trees.
- Increase stewardship and active management of forested parks through the Green Seattle Partnership.
- Expand partnership approaches to plant and maintain trees on private property like the Trees for Neighborhoods program.
- Plant more trees in the right of way and parks.
- Test technologies like flexible surfaces and expanded tree pits and explore creative uses of the right of way for trees and green infrastructure.

Incentives for Ground Floor Open Space. Allowing additional height (but not FAR) for projects that provide more ground level open space could create more space for trees and make the ground floor environment more open and inviting.

Point access blocks to achieve narrower building footprints. Seattle's building code allows up to 6-story point access block buildings (i.e., each building has just one staircase/elevator core instead of units surrounding a double-loaded corridor) which can support dense housing using narrow floorplates. Raising awareness about this type of housing, as well as allowing more than two per lot, could provide the flexibility for incremental development over time to achieve community needs and urban design goals better and more quickly than traditional processes of parcel assembly and development of large, bulky buildings.

Additionally, tall point access block buildings allow for housing development to have the necessary density to pencil while also allowing for greater unit diversity in the building. This means 3+ bedroom units are more viable to develop and multifamily housing is friendlier to children and families.

New combinations of allowed height, FAR, and setbacks found in Seattle's zoning regulations could lead to denser housing that is taller but still improves wellbeing, livability, and sociability for those living in the housing, while also easing some aesthetic, size, and shade concerns from neighbors. New or adjusted zones that allow 5- to 8-story midrise buildings, while having FARs closer to current low-rise 3- and 4-story buildings, and that relax side and front setbacks, could allow for point access block or single stair buildings.

Accessibility. Potential code changes—such as updates to the City's building code to significantly reduce the size and cost of elevators—would further promote compact building forms, while also increasing accessibility in new housing. See **Appendix J** for more information on proposed legislation.

Shadows

Shadows on street trees. Select future trees and vegetation with future shadow conditions in mind.

Views

Investments to support public viewpoints. Additional funding for viewpoints on public property to draw attention to key viewpoints could help make better use of existing views.

Street trees. Select future trees and vegetation with existing viewpoints in mind.

130th/145th Station Area

- **Urban design and active transportation: Transit celebration**. Incentivize or require development to relate to, enhance, celebrate, and activate the station entry with transit-oriented commercial and public space.

- **Urban design and active transportation: Intersite connectivity.** Incentivize or require new development to provide new paths or streets to break down large blocks and provide direct, short routes to the station.
- **Street-level community building: Lack of focused public realm.** Undertake a community design effort to develop a cohesive approach toward development of public streets, public realm, or opportunities for shared social gathering that could be implemented through a combination of private development and public projects.
- **Street-level community building: Affordable commercial space.** Implement the 130th & 145th Station Area Planning Plan displacement mitigation strategies.
- **Child-friendly city and social wellbeing: Shared open space.** Incentivize or require outdoor gathering spaces, especially children's play areas, that are oriented away from air and noise pollutants. Consider allowing zero-lot line development to allow for incremental development of interlocking buildings that create an active and varied street front—that can also block air and noise—while consolidating privately shared gathering space internally.
- **Sociability: Small social spaces.** Incentivize or require social corridors and/or shared entries amongst a small group of units in residential development to promote trust-building and social connections. Consider allowing more than 2 single-stair buildings per lot to maximize opportunities for shared entries amongst smaller groups of neighbors.

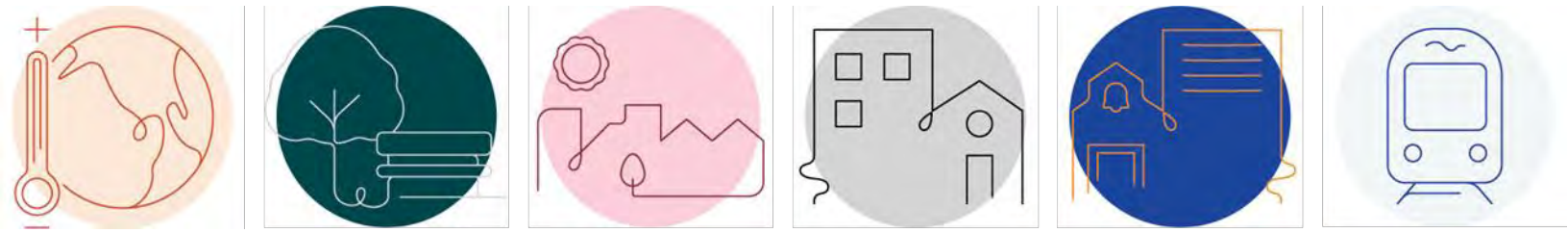
3.6.4 Significant Unavoidable Adverse Impacts

Over time, additional growth and development will occur in Seattle and a generalized increase in development intensity, height, bulk, and scale is expected under all alternatives—this gradual conversion of lower-intensity uses to higher-intensity development patterns is unavoidable but an expected characteristic of urban population and employment growth. No significant unavoidable adverse impacts to land use patterns, compatibility, or urban form are expected under any alternative.

Future growth is likely to result in temporary or localized land use impacts as development occurs. The potential impacts related to these changes may differ in intensity and location in each of the alternatives and many are expected to resolve over time. Application of the City's adopted or new development regulations, zoning requirements, and design guidelines are anticipated to sufficiently mitigate these impacts.

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3.7 Relationship to Plans, Policies, & Regulations





Source: City of Seattle, 2023.

The City of Seattle's last periodic update of the Comprehensive Plan was approved in 2016. The One Seattle Comprehensive Plan Update is the next major periodic review to evaluate the Comprehensive Plan for continued consistency with the latest provisions of the State of Washington Growth Management Act (GMA), Puget Sound Regional Council's (PSRC's) VISION 2050, Countywide Panning Policies (CPPs), and the community's vision. This section reviews adopted state, regional, and City plans and policies that guide growth in Seattle and reviews the proposed alternatives for consistency with the adopted plans and policies—an impact is identified if the proposal would result in an inconsistency with adopted plans and policies. Mitigation measures to address identified adverse impacts and a summary of any significant unavoidable adverse impacts follow the description of existing conditions (affected environment) and impacts analysis.

Thresholds of significance utilized in this impact analysis include:

- Inconsistency with adopted plans and policies.

Per WAC 365-196-210, consistency means: *no feature of a plan or regulation is incompatible with any other feature of a plan or regulation. Consistency is indicative of a capacity for orderly integration or operation with other elements in a system*.

3.7.1 Affected Environment

The current policy and regulatory framework regulating land use in Seattle flows from the GMA, PSRC's Multi-County Planning Policies (MPPs) contained in VISION 2050, King County's CPPs, the City's current Comprehensive Plan, and implementation actions including development standards in the Seattle Municipal Code (SMC) and the Shoreline Master Program (SMP). Several other regulatory measures affect land use including localized overlay districts and design guidelines.

State & Regional Framework

Growth Management Act

Comprehensive Plans and development regulations within the City of Seattle must be consistent with the provisions of the Growth Management Act (GMA). The GMA was adopted in 1990 to address concerns about the impacts of uncoordinated growth on Washington communities and the environment and provides a framework for land use planning and development regulations in the state. The GMA directs coordinated regional and countywide planning, which then inform the locally adopted comprehensive plans and development regulations of individual cities and counties. Key provisions of the GMA include:

- Planning Goals
- Land Designations
- Multicounty Planning Policies (MPPs)

- Buildable Lands Program
- Countywide Planning Policies (CPPs)
- Local Comprehensive Planning

The GMA is primarily codified under Chapter 36.70A RCW. In 2021, GMA goals and element requirements regarding housing were amended to require jurisdictions to plan for and accommodate housing that is affordable to all economic segments of the population and to identify and address racially disparate impacts (see **Section 3.8 Population, Housing, & Employment**). The Washington State Department of Commerce (Commerce) published a summary of amendments to the GMA from 1995 through 2022.[28]



Relationship between the GMA, VISION 2050 and MPPs, CPPs, and local comprehensive plans. Source: PSRC, 2022.

The GMA includes 15 planning goals, in no particular order, to help guide the development and adoption of local comprehensive plans and development regulations. The fifteenth goal references goals and policies of the Shoreline Management Act. These goals direct most population and employment growth to be focused in urban areas to avoid sprawl, provide efficient and effective services and infrastructure within adopted levels of service, and protect environmentally critical areas. See **Exhibit 3.7-1**.

Exhibit 3.7-1. GMA Goals

GMA Goal	Text
(1) Urban growth	Encourage development in urban areas where adequate public facilities and services exist or can be provided in an efficient manner.
(2) Reduce sprawl	Reduce the inappropriate conversion of undeveloped land into sprawling, low-density development.
(3) Transportation	Encourage efficient multimodal transportation systems that will reduce greenhouse gas emissions and per capita vehicle miles traveled and are based on regional priorities and coordinated with county and city comprehensive plans.
(4) Housing	Encourage the availability of affordable housing 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.

[28] Available online at https://www.commerce.wa.gov/about-us/rulemaking/gma-laws-rules/.

GMA Goal	Text
(5) Economic development	Encourage economic development throughout the state that is consistent with adopted comprehensive plans, promote economic opportunity for all citizens of this state, especially for unemployed and for disadvantaged persons, promote the retention and expansion of existing businesses and recruitment of new businesses, recognize regional differences impacting economic development opportunities, and encourage growth in areas experiencing insufficient economic growth, all within the capacities of the state's natural resources, public services, and public facilities.
(6) Property rights	Private property shall not be taken for public use without just compensation having been made. The property rights of landowners shall be protected from arbitrary and discriminatory actions.
(7) Permits	Applications for both state and local government permits should be processed in a timely and fair manner to ensure predictability.
(8) Natural resource industries	Maintain and enhance natural resource-based industries, including productive timber, agricultural, and fisheries industries. Encourage the conservation of productive forestlands and productive agricultural lands and discourage incompatible uses.
(9) Open space and recreation	Retain open space, enhance recreational opportunities, conserve fish and wildlife habitat, increase access to natural resource lands and water, and develop parks and recreation facilities.
(10) Environment	Protect the environment and enhance the state's high quality of life, including air and water quality, and the availability of water.
(11) Citizen participation and coordination	Encourage the involvement of citizens in the planning process, including the participation of vulnerable populations and overburdened communities, and ensure coordination between communities and jurisdictions to reconcile conflicts.
(12) Public facilities and services	Ensure that those public facilities and services necessary to support development shall be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.
(13) Historic preservation	Identify and encourage the preservation of lands, sites, and structures that have historical or archaeological significance.
(14) Climate change and resiliency	~~(14)~~ Ensure that comprehensive plans, development regulations, and regional policies, plans, and strategies … 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.
(15) Shorelines	For shorelines of the state, the goals and policies of the shoreline management act as set forth in RCW 90.58.020 shall be considered an element of the county's or city's comprehensive plan.

Sources: RCW 36.70A.020 and RCW 36.70A.480 (1), 2023.

Jurisdictions planning under the GMA are required to balance these goals in the development and adoption of their comprehensive plans and development regulations. Counties and cities in most parts of the state—including Central Puget Sound—must prepare comprehensive plans that include objectives, principles, standards, and a future land use map. Required elements of the comprehensive plan include land use, housing, capital facilities plan, utilities, rural (for counties), transportation, economic development, parks and recreation, and climate change and resiliency. Local governments may include other elements if they wish. Development

regulations, such as zoning, must be consistent with the local government's Comprehensive Plan. Counties and cities must be up to date with the requirements of the GMA, including the periodic update requirements, to be eligible for grants and loans from certain state infrastructure programs.

VISION 2050 & Multicounty Planning Policies

Puget Sound Regional Council (PSRC) develops policies and coordinates decisions about regional growth, transportation, and economic development planning within King, Pierce, Snohomish, and Kitsap counties. VISION 2050 is the long-range growth management, environmental, economic, and transportation strategy for the four-county Puget Sound region. It was adopted by PSRC in October 2020 and is endorsed by more than 100 member cities, counties, ports, state and local transportation agencies, and Tribal governments within the region. PSRC reviews local plans for consistency with VISION 2050 and the Regional Transportation Plan.

VISION 2050 includes the GMA required multicounty planning policies (MPPs) for the four counties and a regional strategy for accommodating growth through 2050. The MPPs provide direction for more efficient use of public and private investments and inform updates to countywide planning policies and local comprehensive plan updates. VISION 2050 includes 216 MPPs organized by the topic area goals in **Exhibit 3.7-2**.

Exhibit 3.7-2. VISION 2050 Topic Area Goals

Topic Area	VISION 2050 Goal
Regional Collaboration **15 MPPs**	The region plans collaboratively for a healthy environment, thriving communities, and opportunities for all.
Regional Growth Strategy **16 MPPs**	The region accommodates growth in urban areas, focused in designated centers and near transit stations, to create healthy, equitable, vibrant communities well-served by infrastructure and services. Rural and resource lands continue to be vital parts of the region that retain important cultural, economic, and rural lifestyle opportunities over the long term.
Environment **22 MPPs**	The region cares for the natural environment by protecting and restoring natural systems, conserving habitat, improving water quality, and reducing air pollutants. The health of all residents and the economy is connected to the health of the environment. Planning at all levels considers the impacts of land use, development, and transportation on the ecosystem.
Climate Change **12 MPPs**	The region substantially reduces emissions of greenhouse gases that contribute to climate change in accordance with the goals of the Puget Sound Clean Air Agency (50% below 1990 levels by 2030 and 80% below 1990 levels by 2050) and prepares for climate change impacts.
Development Patterns **54 MPPs**	The region creates healthy, walkable, compact, and equitable transit oriented communities that maintain unique character and local culture, while conserving rural areas and creating and preserving open space and natural areas.
Housing **12 MPPs**	The region preserves, improves, and expands its housing stock to provide a range of affordable, accessible, healthy, and safe housing choices to every resident. The region continues to promote fair and equal access to housing for all people.

Topic Area	VISION 2050 Goal
Economy **23 MPPs**	The region has a prospering and sustainable regional economy by supporting businesses and job creation, investing in all people and their health, sustaining environmental quality, and creating great central places, diverse communities, and high quality of life.
Transportation **32 MPPs**	The region has a sustainable, equitable, affordable, safe, and efficient multimodal transportation system, with specific emphasis on an integrated regional transit network that supports the Regional Growth Strategy and promotes vitality of the economy, environment, and health.
Public Services **30 MPPs**	The region supports development with adequate public facilities and services in a timely, coordinated, efficient, and cost-effective manner that supports local and regional growth planning objectives.

Source: PSRC VISION 2050, 2020.

The regional growth strategy in VISION 2050 calls for focusing new housing, jobs, and development within regional growth centers and near high capacity transit. The strategy also aims to keep rural areas, farmland, and forests healthy and thriving. Regional growth centers have been a central strategy of regional planning for decades, although centers have been designated through different procedures depending on when they were first designated. Seattle's six urban centers and two manufacturing industrial centers (MICs) are also designated PSRC Metro Regional Growth Centers (RGCs) and Employment MICs, respectively, in VISION 2050. See **Exhibit 3.7-3**.

Exhibit 3.7-3. PSRC Regional Growth Centers in Seattle

Center	VISION 2050 Center Designation
Downtown	Regional Growth Center—Metro
First Hill/Capitol Hill	Regional Growth Center—Urban
University District	Regional Growth Center—Urban
South Lake Union	Regional Growth Center—Urban
Uptown	Regional Growth Center—Urban
Northgate	Regional Growth Center—Urban
Ballard-Interbay	Manufacturing Industrial Center—Growth
Duwamish	Manufacturing Industrial Center—Growth

Source: PSRC VISION 2050, 2020.

VISION 2050 includes updated regional geographies and modified classifications for cities and unincorporated urban areas based on size, function, and access to high-capacity transit. The updated regional geographies are:

- Metropolitan Cities
- Core Cities
- High-Capacity Transit (HCT) Communities
- Cities & Towns

- Urban Unincorporated Areas
- Rural
- Resource Lands
- Major Military Installations
- Indian Reservation Lands

The City of Seattle is considered a Metropolitan City, which is a civic, cultural, and economic hub with convenient access to high-capacity transit. Per VISION 2050, Metropolitan Cities (including Seattle) are to take a large share of the four-county growth (36% of population and 44% of jobs). VISION 2050 further encourages these cities to accommodate more growth that improves jobs/housing balances, if possible.

Countywide Planning Policies

The GMA requires counties and cities to collaboratively develop countywide planning policies (CPPs) to set the general framework for coordinated land use and population planning between a county and its cities to ensure comprehensive plans are consistent with each other (RCW 36.70A.210). The role of the CPPs is to coordinate comprehensive plans of jurisdictions in the same county regarding regional issues and issues affecting common borders (RCW 36.70A.100).

The King County CPPs were adopted December 14, 2021, and last amended December 6, 2022, and are consistent with PSRC's MPPs and Regional Growth Strategy. The CPPs aim to promote sustainable and equitable growth, protect the environment, and enhance the quality of life for residents. Key topics covered by the CPPs include urban centers, housing, transportation, public facilities, and economic development. The policies encourage compact and coordinated land use patterns, with a focus on preserving open spaces and natural areas. They also promote the use of public transportation and encourage the development of walkable communities.

The CPPs aim to increase the availability of affordable housing for all residents, with a focus on providing housing for low- and moderate-income households. The policies encourage the development of diverse housing options that are accessible to a range of household types, including single-family homes and apartments, as well as middle housing such as townhouses, duplexes, and accessory dwelling units (ADUs). The CPPs' economic vision emphasizes providing opportunities for everyone, including BIPOC[29]-, immigrant-, and women-owned businesses.

The CPPs also set housing and job growth targets for each jurisdiction within the county for the planning period between 2019 and 2044. Other policies related to expanding housing options and neighborhood choice, however, may result in cities needing to increase capacity further to encourage a variety of housing typologies. Seattle's minimum growth targets as set in the CPPs are for 112,000 new housing units and 169,500 new jobs between 2019 and 2044.[30] The City of Seattle has adjusted the growth targets to a 20 year time frame by accounting for constructed

[29] Black, indigenous, persons of color
[30] See Table DP-1 on page 23 of the King County CPPs.

growth in recent years and prorating growth in future years. In spring 2023, a set of amendments to housing affordability targets was developed. For Seattle the units and emergency beds are shared in **Exhibit 3.7-4**. **Section 3.8 Population, Housing, & Employment** provides a discussion of affordable housing.

Exhibit 3.7-4. Net New Housing Units and Emergency Housing Needed, 2019-2044

Total Housing Need	0 To ≤30%		>30 To ≤50%	>50 To ≤80%	>80 To ≤100%	>100 To ≤120%	>120%	Emergency Housing
	Non-PSH	PSH						Beds
112,000	28,572	15,024	19,144	7,986	5,422	6,150	29,702	21,401

Legend: PSH = permanent supportive housing
Source: King County, 2023.

Appendix 6 of the CPPs also includes designation criteria for countywide growth centers. Countywide growth centers are intended to serve important roles as places for equitably concentrating jobs, housing, shopping, and recreational opportunities. These are often smaller downtowns, high-capacity transit station areas, or neighborhood centers that are linked by transit. Countywide growth centers provide a mix of housing and services and serve as focal points for local and county investment. The criteria include an existing density of at least 18 activity units and planned density of at least 30 activity units. Countywide growth centers are also expected to be between 160–500 acres in size, include frequent all-day transit service, and demonstrate evidence of the center's regional or countywide role and future market potential to support the planned densities. No countywide growth centers are formally designated in King County although several have received preliminary approval. See **Section 3.6 Land Use Patterns & Urban Form** for additional analysis of Seattle's existing and proposed urban villages in relation to the activity unit and size designation criteria.

Exhibit 3.7-5. King County Countywide Planning Policies

Chapter/Element	Vision/Goals
Vision for King County 2050	It is the year 2050 and our county has changed significantly in the roughly 60 years that have elapsed since the first Countywide Planning Policies were adopted in 1992. In 2050, ▪ Communities across King County are welcoming places where every person can thrive. ▪ All residents have access to opportunity and displacement from development is lessened. ▪ The cities are vibrant and inviting hubs for people with a safe, affordable, and efficient transportation system that connects people to the places they want to go. ▪ Housing is characterized by a full range of options that are healthy, safe, affordable, and open to all. ▪ The county's critical areas are protected and have been restored. ▪ Open spaces are well distributed and inviting to all users. ▪ The Rural Area is viable and permanently protected with a clear boundary between urban and rural areas. ▪ The county boasts of bountiful agricultural areas and productive forest lands. ▪ The economy provides opportunities to everyone and includes Black, Indigenous, and other People of Color-owned businesses; immigrant- and women-owned businesses; locally owned businesses; and global corporations.

Chapter/Element	Vision/Goals
Environment	Overarching Goal: The quality of the natural environment in King County is restored and protected for future generations.
Development Patterns	Overarching Goal: Growth in King County occurs in a compact, centers-focused pattern that uses land and infrastructure efficiently, connects people to opportunity, and protects Rural and Natural Resource Lands.
Housing	Overarching Goal: Provide a full range of affordable, accessible, healthy, and safe housing choices to every resident in King County. All jurisdictions work to: ▪ preserve, improve, and expand their housing stock; ▪ promote fair and equitable access to housing for all people; and ▪ take actions that eliminate race-, place-, ability-, and income-based housing disparities.
Economy	Overarching Goal: All people throughout King County have opportunities to prosper and enjoy a high quality of life through economic growth and job creation.
Transportation	Overarching Goal: The region is well served by an integrated, multimodal transportation system that supports the regional vision for growth, efficiently moves people and goods, and is environmentally and functionally sustainable over the long term.
Public Facilities and Services	Overarching Goal: County residents in both Urban and Rural Areas have timely and equitable access to the public services needed to advance public health and safety, protect the environment, and carry out the Regional Growth Strategy.

Source: BERK Consulting, Inc.

Local Framework

Seattle's Existing Comprehensive Plan

Seattle's current Comprehensive Plan, *Seattle 2035*, is a 20-year vision and roadmap for Seattle's future. The plan guides City decisions on where to build new jobs and houses, how to improve the transportation system, and where to make capital investments such as utilities, sidewalks, and libraries. Seattle 2035 is the framework for most of Seattle's big-picture decisions on how to grow while preserving and improving the city's neighborhoods.

The Comprehensive Plan was first adopted in 1994 consistent with the GMA. Less extensive revisions and updates are incorporated on an annual basis and major "periodic reviews" were completed in 2004 and 2016. The current plan was last amended in 2022.

The One Seattle Comprehensive Plan Update is the next major periodic review.

Volume 1 of the Comprehensive Plan 2035 consists of fourteen major elements—all of these will be reviewed and updated as part of the proposal:

1. Growth Strategy Element
2. Land Use Element
3. Transportation Element
4. Housing Element
5. Capital Facilities Element
6. Utilities Element

7. Economic Development Element
8. Environment Element
9. Parks and Open Space Element
10. Arts and Culture Element
11. Community Well-Being Element
12. Community Engagement Element
13. Container Port Element
14. Shoreline Element

The four core values of Seattle's Comprehensive Plan are:

- **Race and Social Equity**—limited resources and opportunities must be shared; and the inclusion of under-represented communities in decision-making processes is necessary.
- **Environmental Stewardship**—protect and improve the quality of our global and local natural environment.
- **Community**—developing strong connections between a diverse range of people and places.
- **Economic Opportunity and Security**—a strong economy and a pathway to employment is fundamental to maintaining our quality of life.

Volume 2 of the Comprehensive Plan consists of the City's 38 adopted neighborhood plans.

Urban Villages Strategy & Distribution of Growth

The urban village strategy is the foundation of Seattle's Comprehensive Plan. It is the City's unique approach to meeting the state GMA requirement and is similar to VISION 2050's growth centers approach. This strategy encourages most of the city's expected future growth to occur in specific areas that are best able to absorb and capitalize on that growth. The City has designated four types of areas (represented in Alternative 1, No Action)[31], each of which has a different function and character with varying amounts and intensity of growth and mixes of land uses:

1. **Urban centers** are the densest Seattle neighborhoods. They act as both regional centers and local neighborhoods that offer a diverse mix of uses, housing, and employment opportunities.
2. **Hub urban villages** are communities that offer a balance of housing and employment but are generally less dense than urban centers. These areas provide a mix of goods, services, and employment for their residents and surrounding neighborhoods.
3. **Residential urban villages** are areas of residential development, generally at lower densities than urban centers or hub urban villages. While they are also sources of goods and

[31] 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 the other a~~A~~lternatives ~~2-5~~. Alternative 1 No Action would retain the City's Seattle 2035 urban village strategy and center/village designations—the existing urban centers and villages are categorized here according to the new place types proposed under Alternatives 2-5 for comparison purposes only. Ballard would remain a "Hub Urban Village" under Alternative 1, would be called an "Urban Center" under Alternatives 2-5, and would be redesignated as a Regional Center (as shown here) under Alternative 5.

services for residents and surrounding communities, for the most part they do not offer many employment opportunities.

4. **Manufacturing/industrial centers (MICs)** are home to the city's thriving industrial businesses. Like urban centers, they are important regional resources for retaining and attracting jobs and for maintaining a diversified economy.

The urban village strategy is designed to support the Comprehensive Plan's core values by directing growth to existing urban centers and villages, contributing to the vibrancy of neighborhood centers, and reinforcing the benefits of City investments in transit, parks, utilities, community centers, and other infrastructures.

Land Use Element

The Land Use Element includes goals and policies guiding the physical form and activities allowed in the city. The goals address the City's urban village strategy, housing densities, mixed-use areas, commercial and industrial areas, historic preservation, and critical areas. See **Exhibit 3.7-6**.

Exhibit 3.7-6. Seattle 2035 Land Use Element Goals

Goal	Text
LU G1	Achieve a development pattern consistent with the urban village strategy, concentrating most new housing and employment in urban centers and villages, while also allowing some infill development compatible with the established context in areas outside centers and villages.
LU G2	Provide zoning and accompanying land use regulations that • allow a variety of housing types to accommodate housing choices for households of all types and income levels; • support a wide diversity of employment-generating activities to provide jobs for a diverse residential population, as well as a variety of services for residents and businesses; and • accommodate the full range of public services, institutions, and amenities needed to support a racially and economically diverse, sustainable urban community.
LU G3	Allow public facilities and small institutions to locate where they are generally compatible with the function, character, and scale of an area, even if some deviation from certain regulations is necessary.
LU G4	Provide opportunities for locating radio and television broadcast utilities (major communications utilities) to support continued and improved service to the public and to address potential impacts to public health.
LU G5	Establish development standards that guide building design to serve each zone's function and produce the scale and character desired, while addressing public health, safety, and welfare.
LU G6	Regulate off-street parking to address parking demand in ways that reduce reliance on automobiles, improve public health and safety, reduce greenhouse gas emissions, lower construction costs to reduce the cost of housing and increase affordable housing, create attractive and walkable environments, and promote economic development throughout the city.
LU G7	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 areas with limited access to services, infrastructure constraints, fragile environmental conditions, or that are otherwise not conducive to more intensive development.
LU G8	Allow a variety of housing types and densities that is suitable for a broad array of households and income levels, and that promotes walking and transit use near employment concentrations, residential services, and amenities.
LU G9	Create and maintain successful commercial/mixed-use areas that provide a focus for the surrounding neighborhood and that encourage new businesses, provide stability and expansion opportunities for existing

Goal	Text
	businesses, and promote neighborhood vitality, while also accommodating residential development in livable environments.
LU G10	Provide sufficient land with the necessary characteristics to allow industrial activity to thrive in Seattle and protect the preferred industrial function of these areas from activities that could disrupt or displace them.
LU G11	Promote Downtown Seattle as an urban center with the densest mix of residential and commercial development in the region, with a vital and attractive environment that supports employment and residential activities and is inviting to visitors.
LU G12	Provide flexibility in standard zone provisions or supplement those provisions to achieve special public purposes in areas where unique conditions exist, such as shorelines, historic and special review districts, and major institutions.
LU G13	Encourage the benefits that major institutions offer the city and the region, including health care, educational services, and significant employment opportunities, while mitigating the adverse impacts associated with their development and geographic expansion.
LU G14	Maintain the city's cultural identity and heritage.
LU G15	Promote the economic opportunities and benefits of historic preservation.
LU G16	Promote the environmental benefits of preserving and adaptively reusing historic buildings.
LU G17	Maintain a regulatory system that aims to • protect 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, while permitting reasonable development; • protect the public by identifying seismic and volcanic hazard areas; and • avoid development that causes physical harm to people, property, public resources, or the environment.

Source: Seattle 2035, 2022.

Policies underneath the goals provide direction on how these goals should be implemented.

The Land Use Element also includes a Future Land Use Map with several designations (illustrated in Alternative 1, No Action in **Chapter 2**).[32]

- Urban Center
- Hub Urban Village
- Residential Urban Village
- Manufacturing / Industrial Center
- Neighborhood Residential Areas
- Multi-Family Residential Areas
- Commercial / Mixed Use Areas
- Industrial Areas
- Major Institutions
- Cemetery
- City-Owned Open Space

[32] 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 the other a~~A~~lternatives ~~2-5~~. Alternative 1 No Action would retain the City's Seattle 2035 urban village strategy and center/village designations—the existing urban centers and villages are categorized here according to the new place types proposed under Alternatives 2-5 for comparison purposes only. Ballard would remain a "Hub Urban Village" under Alternative 1, would be called an "Urban Center" under Alternatives 2-5, and would be redesignated as a Regional Center (as shown here) under Alternative 5.

Capital Facilities Element & Capital Improvement Program

The City includes a Capital Facilities Element with goals that are carried forward with specific projects and matching revenues in a Capital Improvement Program:

- CF G1 Develop and manage capital facilities to provide long-term environmental, economic, social, and health benefits for all residents and communities when using public investments, land, and facilities.
- CF G2 Reduce ongoing resource consumption and day-to-day costs of the City's capital facilities, and protect their long-term viability, while serving the needs of the people who use them.
- CF G3 Locate capital facilities to achieve efficient citywide delivery of services, support an equitable distribution of services, minimize environmental impacts, and maximize facilities' value to the communities in which they are located.
- CF G4 Design and construct capital facilities so that they are considered assets to their communities and act as models of environmental, economic, and social stewardship.
- CF G5 Make efficient use of resources when investing in facilities and service delivery that involve other agencies and organizations.

Annually the City adopts a capital improvement program addressing a six-year period and includes major repair and replacement and capacity projects addressing growth. The current one is 2023-2028. It addresses improvements towards:

- Culture & Recreation: Parks and Recreation, Seattle Center, The Seattle Public Library
- Transportation
- Seattle City Light
- Seattle Public Utilities: Drainage & Wastewater, Solid Waste, Water, Technology Projects
- Administration: Finance and Administrative Services, Information Technology

Comprehensive Plan Racial Equity Analysis

The City, in collaboration with the organization PolicyLink, developed an equity evaluation of the 2035 Comprehensive Plan based on a Community Engagement Report using targeted conversations and a Racial Equity Analysis Findings and Recommendations. The review identified persistent racial disparities in Seattle related to:

- Housing affordability, choice, and ownership
- Access to neighborhoods of opportunity (incl. parks, schools, healthy environment)
- Housing insecurity and displacement risk
- Access to Seattle's economic prosperity

PolicyLink identified the following recommendations for Comprehensive Plan update:

- **Growth strategy:** Allow more housing types across the city with equitable access to wealth building and neighborhood opportunities.

- **Affordable housing:** Support tools to increase supply of affordable housing with community control and long-term affordability.
- **Displacement:** More and stronger anti-displacement policies and tools, including preservation of cultural communities.
- **Inclusive economy:** Data-informed tools to promote equitable economic opportunity, e.g., training and hiring preferences.
- **Community engagement:** Provide financial/technical support for sustained BIPOC involvement around comp plan update.

130th/145th Station Area Plan

The *130th and 145th Station Area Plan*, adopted in July 2022, outlines the community and City's concepts for land use, mobility and other policies and investments to support a regional vision for integrating fast and reliable transit with compact walkable communities. The Plan is intended to guide decisions for public and private investment near these high-capacity transit stations. Topics addressed in the plan include land use, mobility, housing, open space, and other community needs. Goals, strategies, and early actions included in the Plan are guided by the following vision:

> *The 130th and 145th Station Area is a lively, walkable and welcoming North Seattle neighborhood. Major streets have roomy, tree-lined sidewalks, and other green infrastructure. Bicycle infrastructure makes everyday trips to transit stations, schools and neighboring urban villages enjoyable and safe. An array of housing offers options affordable to a broad range of incomes and lifestyles. Small shops and cafes near the station cater to locals, commuters, students and visitors. Local and citywide lovers of nature, recreation and culture treasure the abundant greenspaces and unique cultural events so easily reached by walking, biking or transit.*

The station area in the *130th and 145th Station Area Plan* includes the area within ½ mile (about a 10-minute walk) of the 130th and 145th Link stations, and within ¼ mile (about a 5-minute walk) of the 145th/15th Ave Stride bus rapid transit (BRT) station. The Plan also considers a larger study area that includes communities that can access the stations by a longer walk or a short bike or bus ride.

3.7.2 Impacts

Impacts Common to All Alternatives

Growth Management Act

Seattle adopted its Comprehensive Plan complying with the GMA in 1994 and it has been amended periodically since that time. The plan contains the elements required by the GMA and the City has adopted land use and environment regulations (Title 23 and Title 25 in the SMC) that implement the plan.

The action alternatives would each adopt a new growth strategy and each element of the Comprehensive Plan would be updated. The plan would continue to focus growth in an urban area with a range of public services and multimodal transportation options, provide for parks and recreation, and protect critical areas and historic resources consistent with the GMA.

The ~~Draft~~ Final EIS alternatives each accommodate the 2044 growth targets and examine different ways the City could distribute its 2044 forecast growth with varying degrees of concentration. Focusing growth within urban areas in this manner is consistent with GMA policies that seek to prevent sprawl and preserve rural areas and resource lands. All alternatives have sufficient zoned vacant and redevelopable land to accommodate the minimum 20-year population, housing, and job allocations. See **Exhibit 3.7-7**.

Exhibit 3.7-7. Growth Management Act Goals—Alternative Evaluations

GMA Goal	Discussion
(1) Urban growth	Each studied alternative would serve growth with city or municipal services.
(2) Reduce sprawl	Each studied alternative would focus on redevelopment in an urban environment.
(3) Transportation	Each studied alternative would place most growth in centers and around transit investments. Alternatives 2 and 5 and the Preferred Alternative support a station area plan at 130th and 145th Street Station Areas. Alternatives 4 and 5 and the Preferred Alternative further emphasize a range of housing types along corridors.
(4) Housing	All alternatives accommodate housing growth targets and Alternatives 3-5 and the Preferred Alternative add more emphasis on middle housing and other housing types. See also **Section 3.8 Population, Housing, & Employment** for a discussion of how the alternatives impact housing and address new GMA housing requirements in HB 1220.
(5) Economic development	All alternatives accommodate job targets. Most jobs would be located in Area 4 Downtown under all alternatives and the action alternatives spread a slightly higher share of retail/service jobs in neighborhoods in support of greater residents.
(6) Property rights	All alternatives support a reasonable use of property.
(7) Permits	All alternatives would implement City policies promoting fair permitting. Alternatives 2 and 5 and the Preferred Alternative could include a planned action or other facilitated environmental review process for the 130th and 145th Station Areas.
(8) Natural resource industries	There are no designated resource lands in the city limits. Alternatives 2-5 and the Preferred Alternative would concentrate more housing growth in balance with jobs,

GMA Goal	Discussion
	which could help reduce the potential regionally for low-density development outside of the city and other urban areas.
(9) Open space and recreation	All alternatives create a demand for parks and recreation under adopted levels of service. The updated Parks, Recreation, and Open Space Plan ~~Comprehensive Plan could~~ includes an updated level of service standard. See **Section 3.11 Public Services**.
(10) Environment	All alternatives would add redevelopment that could implement improved water quality; see **Section 3.1 Earth & Water Quality**. The potential for tree canopy loss or gain is addressed in **Section 3.3 Plants & Animals**.
(11) Citizen participation and coordination	Alternative 1 No Action was based on an engagement process and annual docket evaluation that involved the public in the last periodic review. Relevant to the action alternatives, the One Seattle public participation plan outlines how the City intends to engage community members in the plan update. See the Summary of the scoping process for this EIS in **Chapter 2 Proposal & Alternatives**.
(12) Public facilities and services	All alternatives would allow for growth that increases demand for public services with Alternative 1 the least and Alternative 5 and the Preferred Alternative the most. The City and municipal providers regularly plan for capital facilities to meet current and projected needs. See **Section 3.11 Public Services** and **Section 3.12 Utilities**.
(13) Historic preservation	Each alternative could result in redevelopment that has the potential to alter eligible historic resources or result in ground disturbing activities that could affect cultural resources. See the evaluation and mitigation measures in **Section 3.9 Cultural Resources**.
(14) Climate change and resiliency	Action alternatives include a new Environment and Climate element to advance GHG reduction and climate adaptation measures. The No Action Alternative would continue existing city plans and programs meant to address climate change but were not designed to meet the new HB 1181 requirements in full.
(15) Shorelines	The City maintains a shoreline master program under the Shoreline Management Act. It is updated periodically under a different timeline. The City must be consistent with the shoreline goals of environmental conservation, public access, and shoreline-oriented uses.

Source: BERK, 2023.

VISION 2050 & Multicounty Planning Policies

VISION 2050 policies and alternatives' consistency are evaluated in **Exhibit 3.7-8**. Highlights are described below.

VISION 2050 Regional Growth Strategy, Development Pattern, and Housing Policies: The action alternatives would update the Comprehensive Plan to meet VISION 2050 policies. The No Action Alternative would not update the Comprehensive Plan policies, though the growth capacity would still meet minimum growth targets expected of a Metropolitan city. The action alternatives provide for more growth and could add capacity to meet additional policies and objectives in VISION 2050 including improved balance of jobs and housing, creating opportunities for middle housing, focusing more growth around transit investments, and contributing to a pattern of growth that supports regional climate goals. See **Section 3.8 Population, Housing, & Employment** for a discussion of how the alternatives impact housing and address new GMA housing requirements in HB 1220.

VISION 2050 Climate Policies: All studied alternatives would increase greenhouse gas emissions associated with buildings and waste. The growth levels of Alternatives 2 through 4 combined with anticipated reductions in fuel emissions would reduce transportation emissions. Alternative 5 would slightly increase transportation emissions. The region-wide benefit of channeling development that might otherwise occur in peripheral areas of the city or region to targeted areas could serve to offset these impacts. Additionally, all alternatives appear to result in lower GHG emissions on a per capita basis compared to existing conditions, and action alternatives would have lower per capita rates compared to the No Action Alternative. See **Section 3.2 Air Quality & GHG Emissions**.

VISION 2050 Environment Policies: All alternatives would result in redevelopment that could improve water quality but depending on design could remove tree canopy. Mitigation measures in **Section 3.1 Earth & Water Quality** and **Section 3.3 Plants & Animals** could reduce such impacts. Growth in Seattle that is more balanced between housing and jobs could be beneficial for overall growth patterns in the region and reduce development pressures in other non-urban areas.

VISION 2050 Public Services Policies: All alternatives would increase the demand for public services and utilities, requiring capital facility planning. The No Action Alternative would increase the demand the least and Alternative 5 the most. See **Section 3.11 Public Services** and **Section 3.12 Utilities**.

Exhibit 3.7-8. VISION 2050—Alternatives Evaluation

Topic Area	VISION 2050 Goal	Evaluation
Regional Collaboration **15 MPPs**	The region plans collaboratively for a healthy environment, thriving communities, and opportunities for all.	All alternatives would plan for growth that meets countywide planning policies, which helps promote consistency with other jurisdictions. All alternatives address growth focused on high-capacity transit and centers. This is further emphasized citywide under Alternatives 4 and 5 and the Preferred Alternative around corridors and the redesignated Ballard Regional Center under Alternative 5 and the Preferred Alternative, as well as the urban center in Alternatives 2 and 5 and the Preferred Alternative for the 130th and 145th Street Station Areas. *MPP-RC-8 Direct subregional funding, especially county-level and local funds, to countywide centers, high-capacity transit areas with a station area plan, and other local centers. County-level and local funding are also appropriate to prioritize to regional centers.*
Regional Growth Strategy **16 MPPs**	The region accommodates growth in urban areas, focused in designated centers and near transit stations, to create healthy, equitable, vibrant communities well-served by infrastructure and services.	All alternatives meet MPP-RGS-9 to focus growth in regional growth centers and meet minimum housing growth targets. The action alternatives increase housing growth above minimum growth targets to better balance jobs and housing and to

Topic Area	VISION 2050 Goal	Evaluation
	Rural and resource lands continue to be vital parts of the region that retain important cultural, economic, and rural lifestyle opportunities over the long term.	provide for middle housing as well as focus growth around high-capacity transit, especially Alternatives 4 and 5 and the Preferred Alternative. This is consistent with MPP-RGS-7 that suggests greater housing in Metropolitan Cities like Seattle and MPP-RGS-12 that shows a priority of growth around high-capacity transit. *MPP-RGS-7 Provide additional housing capacity in Metropolitan Cities in response to rapid employment growth, particularly through increased zoning for middle density housing. Metropolitan Cities must review housing needs and existing density in response to evidence of high displacement risk and/or rapid increase in employment.* *MPP-RGS-9 Focus a significant share of population and employment growth in designated regional growth centers.* *MPP-RGS-12 Avoid increasing development capacity inconsistent with the Regional Growth Strategy in regional geographies not served by high-capacity transit.*
Environment **22 MPPs**	The region cares for the natural environment by protecting and restoring natural systems, conserving habitat, improving water quality, and reducing air pollutants. The health of all residents and the economy is connected to the health of the environment. Planning at all levels considers the impacts of land use, development, and transportation on the ecosystem.	All alternatives would add redevelopment that could implement improved water quality; see **Section 3.1 Earth & Water Quality**. The potential for tree canopy loss or gain is addressed in **Section 3.3 Plants & Animals**.
Climate Change **12 MPPs**	The region substantially reduces emissions of greenhouse gases that contribute to climate change in accordance with the goals of the Puget Sound Clean Air Agency (50% below 1990 levels by 2030 and 80% below 1990 levels by 2050) and prepares for climate change impacts.	Growth could increase emissions such as in buildings and waste sources; transportation emissions would decrease for all alternatives except Alternative 5 and the Preferred Alternative. Overall, the No Action Alternative would decrease per capita greenhouse gas emissions and the action alternatives would smaller rates of per capita emissions than the No Action Alternative. See **Section 3.2 Air Quality & GHG Emissions**.
Development Patterns **54 MPPs**	The region creates healthy, walkable, compact, and equitable transit oriented communities that maintain unique character and local culture, while conserving rural areas and creating and preserving open space and natural areas.	All alternatives would focus growth in centers and near transit investments, especially Alternatives 4 and 5 and the Preferred Alternative. There are no designated resource lands in the city limits. The action a~~A~~lternatives ~~2–5~~ would concentrate more housing growth in balance with jobs, which could help the region to reduce the potential for low-density development outside of urban areas.

Topic Area	VISION 2050 Goal	Evaluation
Housing **12 MPPs**	The region preserves, improves, and expands its housing stock to provide a range of affordable, accessible, healthy, and safe housing choices to every resident. The region continues to promote fair and equal access to housing for all people.	All alternatives meet total housing growth targets and the action aAlternatives ~~2-5~~ add more emphasis on middle housing and other housing types, particularly Alternatives 3-5 and the Preferred Alternative. See also **Section 3.8 Population, Housing, & Employment** for a discussion of how the alternatives impact housing and address new GMA housing requirements in HB 1220. *MPP-H-1 Plan for housing supply, forms, and densities to meet the region's current and projected needs consistent with the Regional Growth Strategy and to make significant progress towards jobs/housing balance.*
Economy **23 MPPs**	The region has a prospering and sustainable regional economy by supporting businesses and job creation, investing in all people and their health, sustaining environmental quality, and creating great central places, diverse communities, and high quality of life.	All alternatives accommodate job targets. Most jobs would be located in Area 4 Downtown. The action alternatives spread a slightly higher share of retail/service jobs in neighborhoods in support of greater residents.
Transportation **32 MPPs**	The region has a sustainable, equitable, affordable, safe, and efficient multimodal transportation system, with specific emphasis on an integrated regional transit network that supports the Regional Growth Strategy and promotes vitality of the economy, environment, and health.	Each studied alternative would place most growth in centers and around transit investments. Alternatives 2 and 5 and the Preferred Alternative support a station area plan at 130th and 145th Street areas. Alternatives 4 and 5 and the Preferred Alternative further emphasize a range of housing types along corridors. Transportation improvements would be multimodal. More investments would be needed with greater growth. See **Section 3.10 Transportation**.
Public Services **30 MPPs**	The region supports development with adequate public facilities and services in a timely, coordinated, efficient, and cost-effective manner that supports local and regional growth planning objectives.	All alternatives would allow for growth that increases demand for public services with Alternative 1 the least and Alternative 5 and the Preferred Alternative the most. The City and municipal providers regularly plan for capital facilities to meet current and projected needs. See **Section 3.11 Public Services** and **Section 3.12 Utilities**.

Source: BERK, 2023.

Countywide Planning Policies

Each alternative would provide capacity to meet minimum growth targets for housing and jobs. See **Exhibit 3.7-9**. The ability to produce housing at affordability levels is described in **Section 3.8 Population, Housing, & Employment**. The ~~County~~ City would also meet minimum

standards for the countywide center of 130th Avenue Station Area by total area and activity units under Alternatives 2 and 5 and the Preferred Alternative.

Exhibit 3.7-9. Countywide Planning Policies, Major Goals—Alternatives Evaluation

Chapter/ Element	Goals	Evaluation
Environment	Overarching Goal: The quality of the natural environment in King County is restored and protected for future generations.	All alternatives would add redevelopment that could implement improved water quality; see **Section 3.1 Earth & Water Quality**. The potential for tree canopy loss or gain is addressed in **Section 3.3 Plants & Animals**.
Development Patterns	Overarching Goal: Growth in King County occurs in a compact, centers-focused pattern that uses land and infrastructure efficiently, connects people to opportunity, and protects Rural and Natural Resource Lands.	In general, all alternatives[33] would focus the majority of future growth into urban centers and villages. An additional 80,000 housing units would be added consistent with past growth and existing plan goals which would occur primarily in existing urban centers and villages under all alternatives. The additional 20,000 or 40,000 housing units added under the action alternatives would be accommodated within new place types or expanded urban center and village boundaries located throughout the city depending on the alternative.
Housing	Overarching Goal: Provide a full range of affordable, accessible, healthy, and safe housing choices to every resident in King County. All jurisdictions work to: ▪ preserve, improve, and expand their housing stock; ▪ promote fair and equitable access to housing for all people; and ▪ take actions that eliminate race-, place-, ability-, and income-based housing disparities.	The Countywide Planning Policies include housing targets by affordability bands. ▪ 0-30% Area Median Income (AMI): 6% ▪ 31-50% AMI:10% ▪ 51-80% AMI: 17% ▪ Over 80% AMI: 66% All alternatives meet total housing growth targets. Considering the match of unit types to income bands, action alternatives perform better particularly Alternatives 5 and the Preferred Alternative with the greatest opportunity to provide a range of housing types at different income levels. Please see **Section 3.8 Population, Housing, & Employment** for a discussion of how the alternatives impact housing.
Economy	Overarching Goal: All people throughout King County have opportunities to prosper and enjoy a high quality of life through economic growth and job creation.	All alternatives would accommodate job targets and would promote economic opportunity in the city and region. Most jobs would be located in Area 4 Downtown and the action alternatives spread a slightly higher share of retail/service jobs in neighborhoods in support of greater residents. The action alternatives would include additional policies related to workforce development, supporting and growing neighborhood commercial districts, sustaining a healthy climate for growing and emerging industries, and supporting the city's competitive advantage in the industrial and maritime sectors. The action alternatives

[33] 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 the other a~~A~~lternatives ~~2-5~~. Alternative 1 No Action would retain the City's Seattle 2035 urban village strategy and center/village designations. Ballard would remain a "Hub Urban Village" under Alternative 1, would be called an "Urban Center" under Alternatives 2-5, and would be redesignated as a Regional Center under Alternative 5.

Chapter/ Element	Goals	Evaluation
		would also incorporate policies to ensure equitable access to living-wage careers for all residents, and particularly BIPOC communities to be able to share equally in the benefits of Seattle's growing economy.
Transportation	Overarching Goal: The region is well served by an integrated, multimodal transportation system that supports the regional vision for growth, efficiently moves people and goods, and is environmentally and functionally sustainable over the long term.	Each studied alternative would place most growth in centers and around transit investments. Alternatives 2 and 5 and the Preferred Alternative support a station area plan at 130th and 145th Street areas. Alternatives 4 and 5 and the Preferred Alternative further emphasize a range of housing types along corridors. Transportation improvements would be multimodal. More investments would be needed with greater growth. See **Section 3.10 Transportation**.
Public Facilities and Services	Overarching Goal: County residents in both Urban and Rural Areas have timely and equitable access to the public services needed to advance public health and safety, protect the environment, and carry out the Regional Growth Strategy.	All alternatives would allow for growth that increase demand for public services with the least amount of growth and new demand under the No Action Alternative and the most under Alternative 5 and the Preferred Alternative. The City and municipal providers regularly plan for capital facilities to meet current and projected needs. See **Section 3.11 Public Services** and **Section 3.12 Utilities**.

Source: BERK, 2023.

130th/145th Station Area

Each alternative differs in its treatment of the 130th/145th Station Area Plan. See the discussions below.

Equity & Climate Vulnerability Considerations

The action alternatives would adopt a new Comprehensive Plan with a new growth strategy and new Housing Element incorporates the newest requirements to address racially disparate impacts in housing and provide opportunities for housing under a range of income categories per HB1220. The growth strategies under the alternatives would respond to HB1220 requirements as well as PolicyLink recommendations to allow "more housing types across the city with equitable access to wealth building and neighborhood opportunities."

The action alternatives allocate a similar or greater amount of growth to villages as the No Action Alternative. Additional growth over the No Action Alternative is planned in Neighborhood Residential areas and is either clustered (in neighborhood centers under Alternative 2 or in corridors under Alternative 4) or distributed across single family areas with middle housing types (Alternatives 3 and 5 and the Preferred Alternative).

In addition, the action alternatives include new climate policies focused on reducing emissions from buildings and transportation and making the city more capable of withstanding the impacts of climate change. The action alternatives would allow more growth and could increase

emissions locally per **Section 3.2 Air Quality & GHG Emissions**; however, the region-wide benefit of channeling development that might otherwise occur in peripheral areas of the city or region to targeted areas could serve to offset these impacts.

Long-range policies are meant to bring Seattle closer to being carbon neutral by 2050 and help to build a city that adapts and is resilient to rising seas, heat waves, flooding, and more extreme storms. Seattle is committed to working with partners to reach county, regional, and statewide goals (City of Seattle, 2022).

Impacts of Alternative 1: No Action

Alternative 1, No Action, would meet GMA goals regarding compact growth served by multimodal transportation and municipal services. It would not meet new GMA requirements to amend the Housing Element to address new requirements in HB1220 regarding housing opportunities by income band and the removal of racially disparate impacts. Likewise, new housing targets by income band and special needs housing required in Countywide Planning Policies would not be met. Alternative 1 could perhaps conflict with Countywide Planning Policies that direct cities to provide a full range of affordable, accessible, healthy, and safe housing choices to every resident in King County as it would continue to limit the range of housing options in many areas of Seattle.

The No Action Alternative would provide capacity to minimum housing and growth targets consistent with VISION 2050, but other elements of the Comprehensive Plan would not reflect more recent VISION 2050 policies regarding equity, climate change, and others. The No Action Alternative would not include a new climate element to meet GMA requirements or VISION 2050 policies nor address the findings of the equity evaluation of Seattle 2035 plan.

Greenhouse gas emissions could increase for buildings and waste and less so for transportation under the No Action Alternative; per capita air emissions would be slightly higher than under the action alternatives but still lower than existing per capita rates. See **Section 3.2 Air Quality & GHG Emissions**.

130th/145th Station Area

The *130th and 145th Station Area Plan* and its vision and strategies would not be implemented under the No Action Alternative. Housing and job growth around both station areas would be minimal.

Impacts of Alternative 2: Focused

Policies: All the action alternatives, including Alternative 2, would update the Comprehensive Plan policies to meet state and regional requirements. Areas of focus include the following:

- **Climate Change:** The Comprehensive Plan will include new climate policies focused on reducing emissions from buildings and transportation and making the city more capable of

withstanding the impacts of climate change. Long-range policies will bring Seattle closer to being carbon neutral by 2050 and adapt to climate exposures despite rising seas, heat waves, flooding, and more extreme storms. Seattle is committed to collaborating with partners to reach county, regional, and statewide goals.

- **Economic Development:** The Economic Development Element will seek to support and grow neighborhood commercial districts, sustain a healthy climate for growing and emerging industries, and support the city's competitive advantage in the industrial and maritime sectors. The update will include policies to ensure equitable access to living-wage careers for all residents and allow BIPOC communities to be able to share equally in the benefits of Seattle's growing economy.
- **Housing:** A new element would meet new GMA requirements and address additional housing types and affordability levels. The intent is to address the City's severe housing shortage and increasing rents and home sales prices, provide resources for low-income housing, address the underproduction of smaller and lower cost homes, remove racial disparities in housing access and homeownership, reduce displacement risks, and reduce the risks of becoming homeless.
- **Parks and Open Space:** The City will develop strategies that expand, connect, improve, and maintain Seattle's public space network. The effort centers racial equity to support the health and well-being of all communities. The work will include identifying how public space can help provide resilience to climate change. The Plan will also look at ways Seattle can deliver green improvements to neighborhoods that are vulnerable to displacement in ways that support community stability.
- **Transportation:** The Transportation Element contains broad policy guidance for a transportation system that meets the city's mobility needs and advances climate, safety, and equity goals. The element will address growth across Seattle by supporting improvements to benefit walking, biking, transit, and freight mobility. The Comprehensive Plan is being updated at the same time as the Seattle Transportation Plan, which will provide more details about strategies and actions Seattle will take to fulfill a collective transportation vision.
- **Environment and Climate Element:** A chapter of the plan will address new requirements of HB 1181 to provide a climate change and resiliency element including GHG reduction and resiliency sub-elements. Goals include becoming carbon neutral by 2050 and being prepared for direct and indirect impacts of climate change and other natural hazards.

Growth Targets and Strategies: Alternative 2 would provide more housing in areas of focused growth than Alternative 1 which would support an improved jobs/housing balance.

Allowing for greater growth in Metropolitan Cities to provide more housing types and support transit is consistent with VISION 2050. See also **Section 3.8 Population, Housing, & Employment** for a discussion of how Alternative 2 impacts housing and addresses new GMA housing requirements in HB 1220.

Consistency with State and Regional Environmental Goals: Alternative 2 would allow for improved water quality where new development implements modern stormwater standards.

More growth could accelerate loss of tree canopy unless development standards are modified as noted in **Section 3.3 Plants & Animals** and **Section 3.6 Land Use Patterns & Urban Form**. Air quality results show slightly reduced per capita emissions compared to the No Action Alternative including reduced transportation emissions (see **Section 3.2 Air Quality & GHG Emissions**).

130th/145th Station Area

Land use designations, zoning, and policies under Alternative 2 would implement the *130th and 145th Station Area Plan* vision and strategies. Both stations areas would see more growth clustered in the newly designated neighborhood centers compared to the No Action Alternative and existing conditions. Growth would increase activity units from 18.6 (existing) to 29.9 around NE 130th Street and from 35.7 (existing) to 83.3 around 15th and 145th.

Impacts of Alternative 3: Broad

Impacts under Alternative 3 are similar to those described under Alternative 2, except that more attention to middle housing types would occur in Neighborhood Residential Areas. This could help implement VISION 2050 policies that allow for more housing capacity in Metropolitan cities to support middle housing types.

130th/145th Station Area

Not applicable. The *130th and 145th Station Area Plan* would not be implemented.

Impacts of Alternative 4: Corridor

Impacts under Alternative 4 are similar to those described under Alternative 2. Allowing for additional housing types around high-capacity transit corridors would help implement VISION 2050 policies that allow for more housing capacity in Metropolitan cities to address transit investments.

130th/145th Station Area

Not applicable. The *130th and 145th Station Area Plan* would not be implemented.

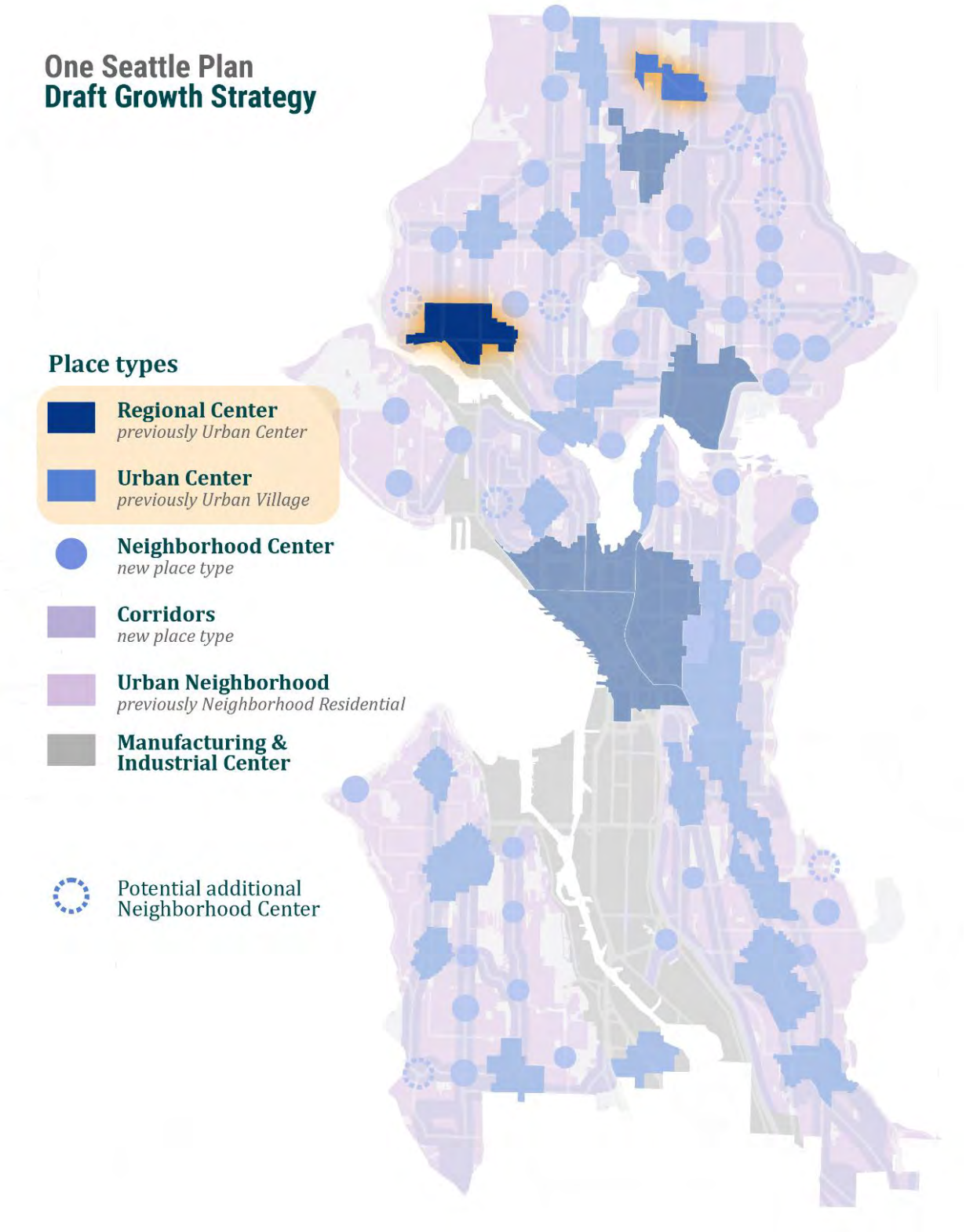
Impacts of Alternative 5: Combined

Alternative 5 would update the Comprehensive Plan to meet state and regional requirements. Alternative 5 and the Preferred Alternative ~~It~~ would also provide the greatest capacity for housing to meet affordability and jobs/housing balance goals, benefiting the region's environmental conservation goals.

The City intends to designate two new centers under Alternative 5—one under PSRC's VISION 2050 plan and one under the CPP countywide centers, though it must be nominated in the countywide planning policies (DP-32). See **Exhibit 3.7-10** and **Section 3.6 Land Use Patterns & Urban Form**:

- The existing **Ballard** Hub Urban Village would be redesignated as a regional center. It would likely be proposed to be designed as an Urban RGC ~~regional center~~ by the Puget Sound Regional Council as part of future processes. The proposed regional growth center in Ballard would meet PSRC designation criteria for size and existing and planned future activity units with a study area of 495 acres and 67.7 existing and 101.0 planned activity units by 2044.
- The **NE 130th Street Station Area** would be designated a new urban center. It would likely be proposed to be designated as a Countywide Center as part of future processes. The proposed center at NE 130th Street Station Area would meet countywide center designation criteria for existing and planned future activity units with 18.4 exiting and 35.5 planned activity units by 2044.

Exhibit 3.7-10. Proposed Redesignated and New Centers—Alternative 5



Source: City of Seattle, 2023.

The Alternative also expands existing urban centers and villages.[34] The boundary expansions for regional and urban centers are intended to allow them to comply with Countywide Center criteria for size. The Admiral, Morgan, and Upper Queen Anne centers do not meet activity units for Countywide Centers (30 activity unit threshold) in Alternative 5 though their size would meet standards. A preferred alternative, if included in the Final EIS, could allocate more growth in those center locations such as by moving housing and job allocations from corridors or other place types. See **Exhibit 3.7-11** and **Exhibit 3.7-12**.

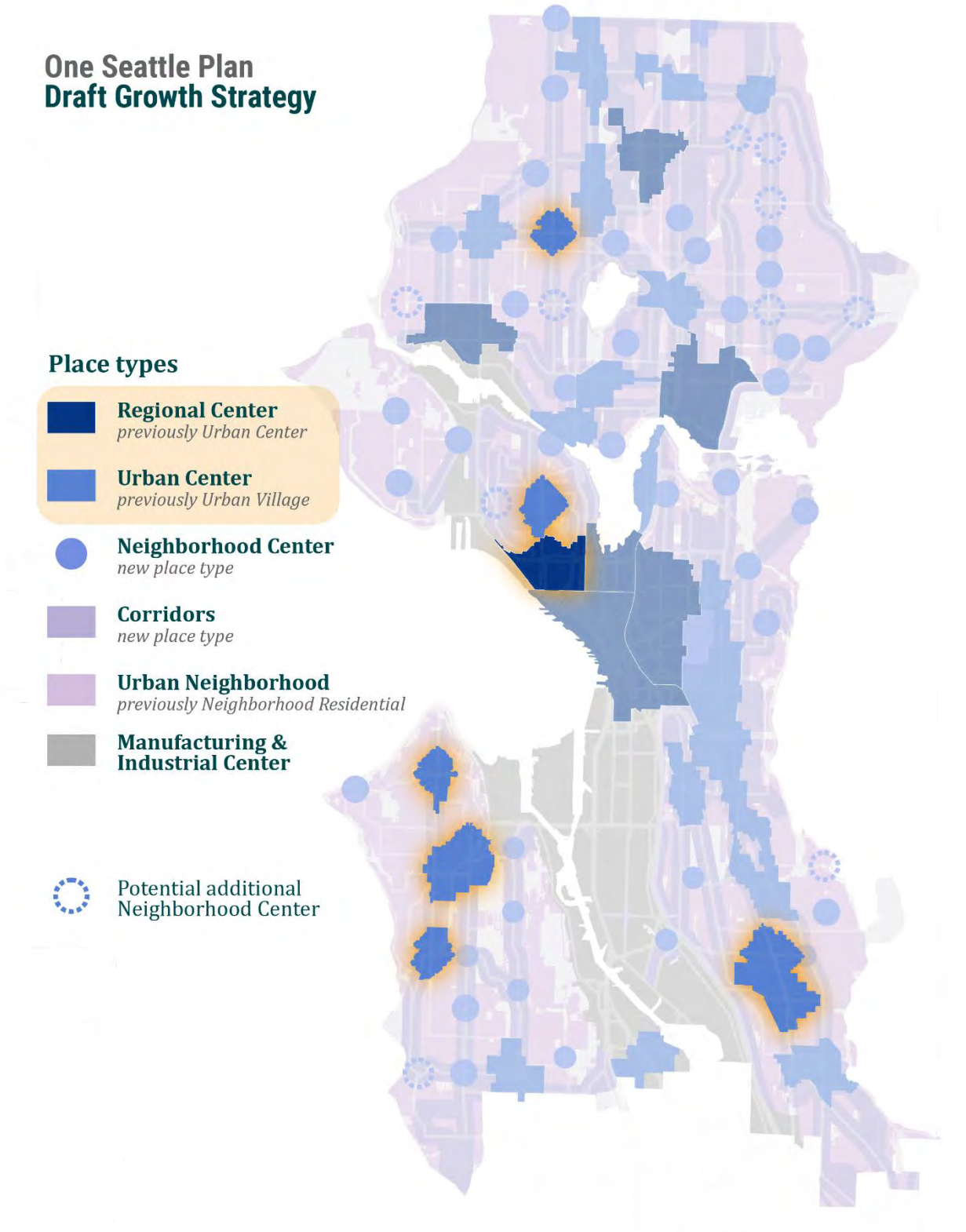
Exhibit 3.7-11. Proposed Center Expansions—Alternative 5

Type of Expansion	Centers	Size and Future Activity Units/Acre
Expand centers too small to meet **Countywide Center criteria** to include all areas within a 7.5-minute walk (2,000 feet) of central intersection	▪ Greenwood–Phinney Ridge ▪ Upper Queen Anne ▪ Admiral ▪ Morgan Junction	▪ Greenwood–Phinney Ridge: 315 Acres, 30.4~~7~~ Activity Units ▪ Upper Queen Anne: 329 Acres, 17.8 Activity Units ▪ Admiral: 288 acres, 23.9 Activity Units ▪ Morgan Junction: 281 acres, 25.5 Activity Units
Expand centers with **new light rail stations** to include all areas within a 10-minute walk (half-mile) of light rail station	▪ Uptown ▪ Graham Street (Othello) ▪ West Seattle Junction at Avalon if station approved by ST board	▪ Uptown: 391 acres, 137.2 Activity Units ▪ Graham Street (Othello): 584 acres, 30.6 Activity Units ▪ West Seattle Junction at Avalon: 449 acres, 59.9 Activity Units

Source: City of Seattle, 2023; BERK 2023.

[34] 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 the other a~~A~~lternatives ~~2-5~~. Alternative 1 No Action would retain the City's Seattle 2035 urban village strategy and center/village designations—the existing urban centers and villages are categorized here according to the new place types proposed under the other a~~A~~lternatives ~~2-5~~ for comparison purposes only. Ballard would remain a "Hub Urban Village" under Alternative 1, would be called an "Urban Center" under Alternatives 2-4~~5~~, and would be redesignated as a Regional Center (as shown here) under Alternative 5 and the Preferred Alternative.

Exhibit 3.7-12. Expanded Regional & Urban Centers—Alternative 5



Source: City of Seattle, 2023.

The City may also seek countywide center designation for all urban centers under Alternative 5 to help facilitate infrastructure investments and be locations for facilitated environmental review. This includes responding to SB 5412 which allows for an infill exemption for housing and mixed-use development when considered in an EIS for a Comprehensive Plan. As part of this EIS process state agencies including WSDOT have been consulted and mitigation measures both current regulations and other proposed mitigation could apply to reduce impacts. See **Appendix C** for a list of codes providing mitigation for environmental impacts.

See also **Section 3.8 Population, Housing, & Employment** for a discussion of how Alternative impacts housing and affordability.

130th/145th Station Area

The 130th and 145th Station Areas would have a high intensity of growth around the transit investment under Alternative 5 that would help fulfill the station area plan vision and strategies. A Planned Action Ordinance or other SEPA facilitation options could help advance the vision and implementation of strategies as development occurs.

Impacts of Preferred Alternative

Note: The impacts analysis for the Preferred Alternative was added since the Draft EIS.

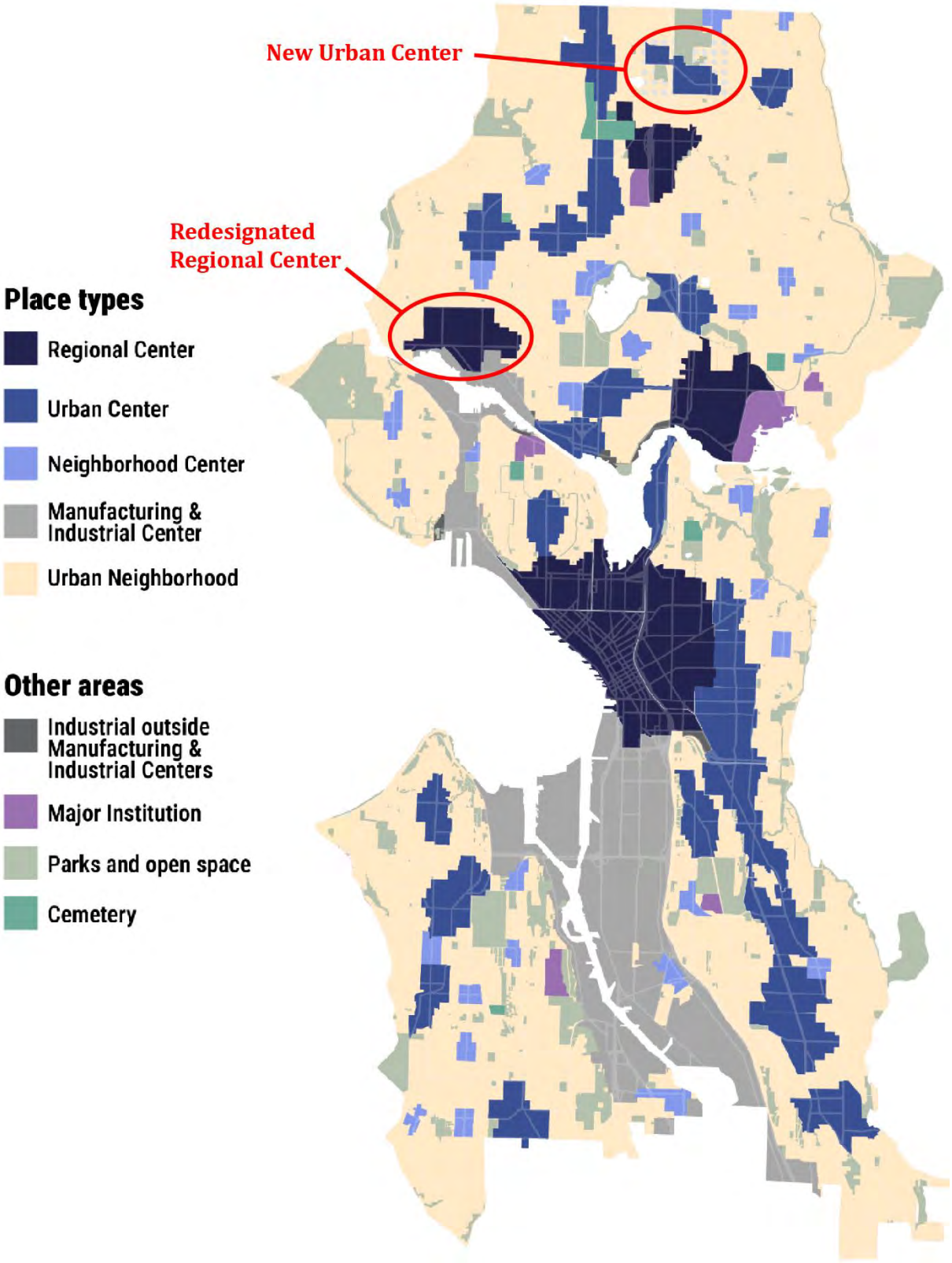
Impacts under the Preferred Alternative are similar to those described under Alternative 5. Like Alternative 5, the Preferred Alternative would update the Comprehensive Plan to meet state and regional requirements and would provide the greatest capacity for housing to meet affordability and jobs/housing balance goals, benefiting the region's environmental conservation goals.

The City intends to designate the same two new centers under the Preferred Alternative as Alternative 5—one under PSRC's VISION 2050 plan and one under the CPP countywide centers, though it must be nominated in the countywide planning policies (DP-32). See **Exhibit 3.7-13** and **Section 3.6 Land Use Patterns & Urban Form**:[35]

- The existing **Ballard** Hub Urban Village would be redesignated as a regional center. It would likely be proposed to be designed as an Urban RGC by the Puget Sound Regional Council as part of future processes. The proposed regional growth center in Ballard would meet PSRC designation criteria for size and existing and planned future activity units with a study area of 495 acres and 57.9 existing and 83.7 planned activity units by 2044.
- The **NE 130th Street Station Area** would be designated a new urban center. It would likely be proposed to be designated as a Countywide Center as part of future processes. The proposed center at NE 130th Street Station Area would meet countywide center designation criteria for planned future activity units with 33.2 planned activity units by 2044. However, existing activity units are slightly below countywide center designation criteria at 17.3.

[35] The Preferred Alternative uses updated and more detailed information to calculate existing and future activity units per acre for each center than Alternatives 1–5. See **Exhibit 3.6-121** in **Section 3.6 Land Use Patterns & Urban Form** and **Appendix B**.

Exhibit 3.7-13. Proposed Redesignated and New Centers—Preferred Alternative



Source: City of Seattle, 2024.

University Community and Northgate would be below PSRC's future activity unit threshold for Metro RGCs but be above the threshold for Urban RGCs (like the other alternatives) as would Uptown which could result in redesignation from Metro to Urban RGC in the future. The Preferred Alternative also expands the boundaries of nine existing centers and splits 23rd and Union Jackson and Othello into two urban centers each.[36] The boundary revisions for regional and urban centers are intended to allow them to comply with Countywide Center criteria for size and activity unit thresholds. All urban centers would meet King County's minimum future density criteria for Countywide Centers (including, the split Othello and Graham centers and Rainier Beach) but Green Lake, Lake City, and Madison-Miller would still be below the size threshold. The Preferred Alternative also redesignates South Park as a neighborhood center (previously an urban center under the other alternatives).

See **Exhibit 3.7-14** and **Exhibit 3.7-15**.

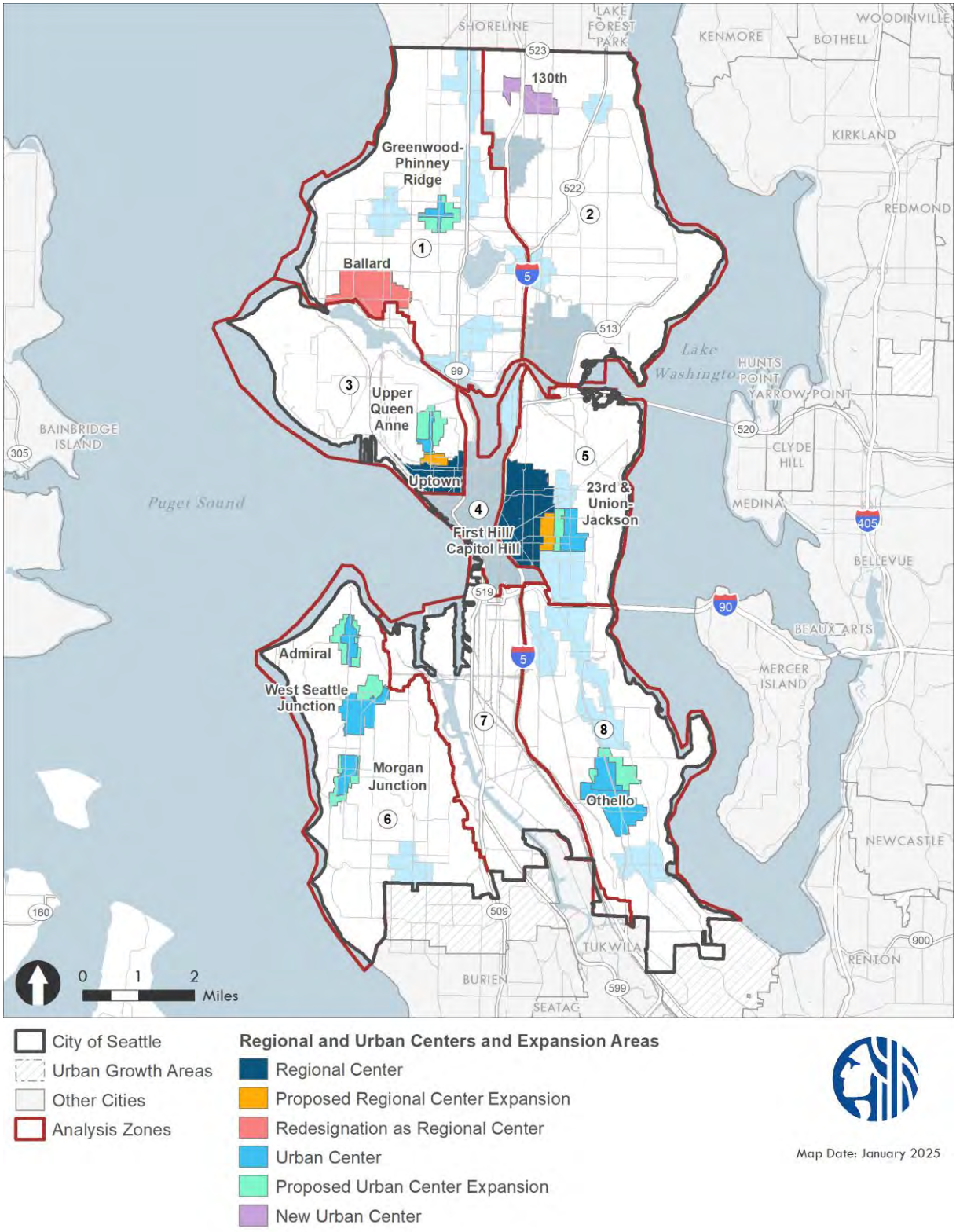
Exhibit 3.7-14. Proposed Center Expansions and Splits—Preferred Alternative

Type of Expansion	Centers	Size and Future Activity Units/Acre
Expand centers too small to meet **Countywide Center criteria**	▪ Greenwood–Phinney Ridge ▪ Upper Queen Anne ▪ Admiral ▪ Morgan Junction	▪ Greenwood–Phinney Ridge: 197 Acres, 55.3 Activity Units ▪ Upper Queen Anne: 208 Acres, 46.9 Activity Units ▪ Admiral: 219 acres, 37.8 Activity Units ▪ Morgan Junction: 198 acres, 35.1 Activity Units
Expand centers with **new light rail stations** to include all areas within a 10-minute walk (half-mile) of light rail station	▪ Uptown ▪ First Hill/Capitol Hill ▪ West Seattle Junction at Avalon if station approved by ST board	▪ Uptown: 389 acres, 101.9 Activity Units ▪ First Hill/Capitol Hill: 1,015 acres, 129.6 Activity Units ▪ West Seattle Junction at Avalon: 367 acres, 67.6 Activity Units
Expand centers with **new light rail stations** to include all areas within a 10-minute walk (half-mile) of light rail station ***and*** split center too large to meet **Countywide Center criteria**	▪ 23rd & Union Jackson, split into Central District and Judkins Park ▪ Othello, split into Othello and Graham	▪ Central District: 232 acres, 44.6 Activity Units ▪ Judkins Park: 467 acres, 46.5 Activity Units ▪ Othello: 353 acres, 35.8 Activity Units ▪ Graham: 291 acres, 32.0 Activity Units

Note: See **Exhibit 3.6-121** in **Section 3.6 Land Use Patterns & Urban Form** for the size and existing and planned activity units per acre by center under the Preferred Alternative.
Source: City of Seattle, 2024; BERK 2024.

[36] 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 the other alternatives. Alternative 1 No Action would retain the City's Seattle 2035 urban village strategy and center/village designations—the existing urban centers and villages are categorized here according to the new place types proposed under the other alternatives for comparison purposes only. Ballard would remain a "Hub Urban Village" under Alternative 1, would be called an "Urban Center" under Alternatives 2-4, and would be redesignated as a Regional Center (as shown here) under Alternative 5 and the Preferred Alternative.

Exhibit 3.7-15. Expanded Regional & Urban Centers—Preferred Alternative



Source: City of Seattle, 2025; BERK, 2025.

The City may also seek countywide center designation for all urban centers under the Preferred Alternative to help facilitate infrastructure investments and be locations for facilitated environmental review. This includes responding to SB 5412 which allows for a SEPA exemption for housing and mixed-use development when considered in an EIS for a Comprehensive Plan. As part of this EIS process state agencies including WSDOT have been consulted and mitigation measures both current regulations and other proposed mitigation could apply to reduce impacts. See **Appendix C** for a list of codes providing mitigation for environmental impacts.

See also **Section 3.8 Population, Housing, & Employment** for a discussion of how Alternative impacts housing and affordability.

130th/145th Station Area

The 130th and 145th Station Areas would have a high intensity of growth around the transit investment under the Preferred Alternative that would help fulfill the station area plan vision and strategies. A Planned Action Ordinance or other SEPA facilitation options could help advance the vision and implementation of strategies as development occurs.

3.7.3 Mitigation Measures

Incorporated Plan Features

The action alternatives propose a new growth strategy with the following goals:

- **Growth**: Accommodate new housing and jobs over the next 20 years and beyond
- **Housing**: Increase the supply, diversity, and affordability of housing to reduce upward pressure on prices and expand choices for diverse households
- **Equity**: Redress harms from neighborhood exclusion and housing discrimination, meet the housing needs of BIPOC households, and support wealth building opportunities
- **Displacement**: Prevent the displacement of existing residents due to direct impacts and market forces.
- **Complete, climate-friendly neighborhoods**: Create and support communities where more people can access transit, shops, and services by walking and biking.
- **Encourage a diverse mix of businesses and jobs** in neighborhoods across the city and help existing business remain in place.

The action alternatives also propose new housing and place types to help meet affordable housing needs and address racially disparate impacts in support of the City's response to HB1220 (see **Section 3.8 Population, Housing, & Employment**). The action alternatives promote housing types in other bills relevant to middle housing HB 1110 and accessory dwelling units in HB 1137.

A new Environment and Climate Element would meet requirements of HB 1181.

Regulations & Commitments

As required by GMA, the City must submit proposed Comprehensive Plan amendments and updated regulations for review and comment by the State prior to final adoption.

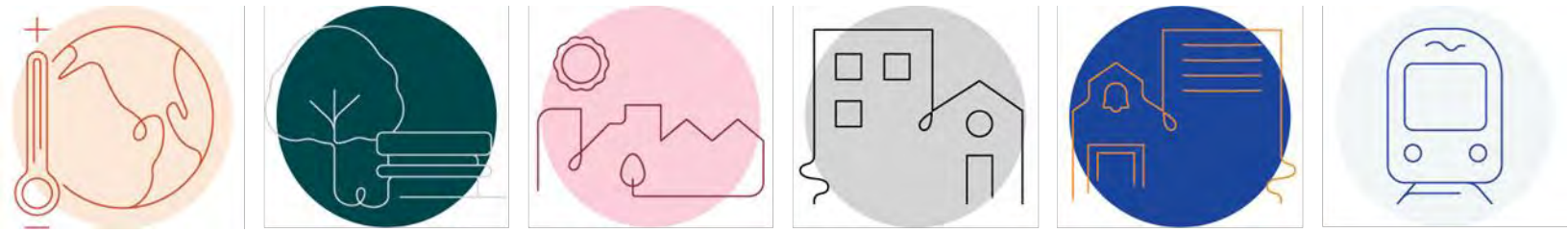
Other Potential Mitigation Measures

~~When a Preferred Alternative is developed, it should be evaluated for conformity to state and regional plans and policies. It may include reallocating growth assumptions in place types while being in the range of the studied alternatives (e.g. to meet Countywide Center or Regional Growth Center criteria).~~ In this Final EIS, the Preferred Alternative is evaluated for conformity to state and regional plans and policies. Activity units would be met; however, some adjustments to center designation type or acreage may be appropriate (e.g., to meet Countywide Center or Regional Growth Center criteria). See **Section 3.6.2** regarding the Preferred Alternative.

3.7.4 Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts are anticipated with respect to plans and policies. Inconsistencies with new regional plans and state requirements and the regional growth strategy under the No Action Alternative would be avoided through amendments to the Comprehensive Plan proposed under the action alternatives.

3.8 Population, Housing, & Employment





Source: City of Seattle, 2023.

This section addresses population, employment, and housing, as well as the historical context of racial segregation that has contributed to today's demographic patterns. A review of these aspects of the affected environment—on a citywide scale and for each analysis area—will serve as a baseline for analyzing the impacts of the five alternatives.

The analysis of impacts addresses likely outcomes of each alternative on Seattle's population, employment, and housing stock. A primary focus of this analysis is the evaluation of how effectively each alternative achieves three objectives:

- Increase the supply, diversity, and affordability of market-rate housing.
- Increase the supply of income-restricted housing.
- Reduce residential displacement.

This analysis also evaluates the potential for increased physical displacement compared to the No Action Alternative. Such an adverse impact is considered significant if the projected number of physically displaced renter households exceeds the projected number of new income-restricted affordable housing units that would be created through Seattle's Mandatory Housing Affordability (MHA) and Multifamily Tax Exemption (MFTE) programs.

Mitigation measures and a summary of any significant unavoidable adverse impacts are included following the impacts analysis.

3.8.1 Affected Environment

Citywide

Population

The City of Seattle's population as of 2022 was 762,500.[37] Population growth in Seattle has been rapid compared to previous decades. Between 2010 and 2020 the city's population grew by more than 20%. In the previous decade, Seattle experienced population growth of 8% (see **Exhibit 3.8-1**).

Exhibit 3.8-1. Total Population of Seattle, 2000-2020

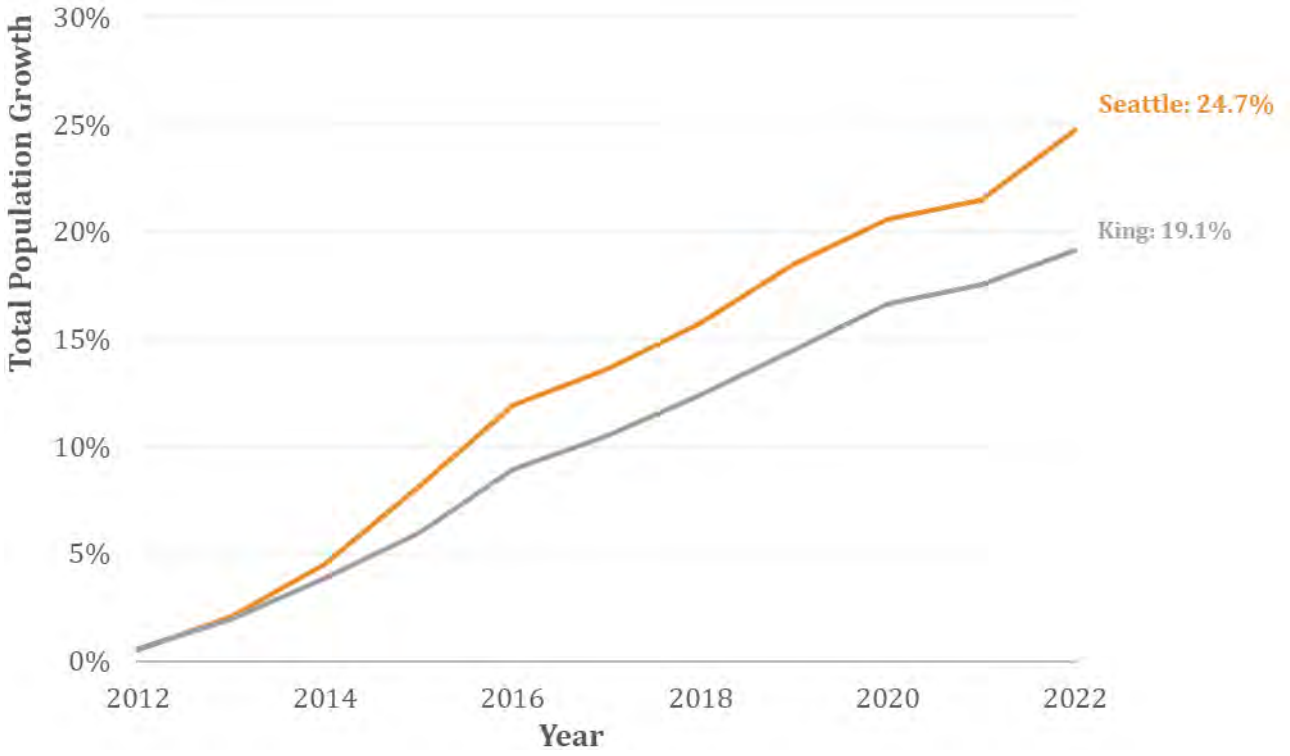
Census Year	Population	% Increase over previous 10 years
2000	563,374	
2010	608,660	8%
2020	737,015	21%

Sources: US Census Bureau, 2000, 2010, 2020.

[37] Washington State Office of Financial Management, 2022.

Over the last decade, Seattle's has grown faster than King County as a whole (about 25% from 2012 to 2022 compared to 19%; see **Exhibit 3.8-2**). Seattle's rapid population growth has been driven in large part by strong job growth and in-migration. Between 2010 and 2020, Seattle gained nearly 176,000 net new jobs. Many of these new jobs attracted foreign-born workers. As of 2021, Seattle's foreign-born population was over 140,000 people (almost one in five Seattle residents) of whom 46% were naturalized U.S. citizens.[38]

Exhibit 3.8-2. Population Growth in Seattle and King County, 2012-2022



Sources: Washington Office of Financial Management, 2022; BERK, 2023.

Exhibit 3.8-3 shows population by analysis area. The population is not evenly distributed among the areas. Areas 1 (Northwest Seattle) and 2 (Northeast Seattle) each have approximately 150,000 residents, compared to under 9,000 in Area 7, which includes the maritime and industrial areas along the Duwamish River. Slightly less than half (46%) of Seattle's residents live in Neighborhood Residential zones, where the predominant housing type is detached homes. The remainder live in zones that feature a greater diversity of housing types, such as apartments or townhomes.

[38] Source: American Community Survey 5-Year Estimates (2017-2021): S0502 SELECTED CHARACTERISTICS OF THE FOREIGN-BORN POPULATION BY PERIOD OF ENTRY INTO THE UNITED STATES

Exhibit 3.8-3. Population by EIS Analysis Area, 2020

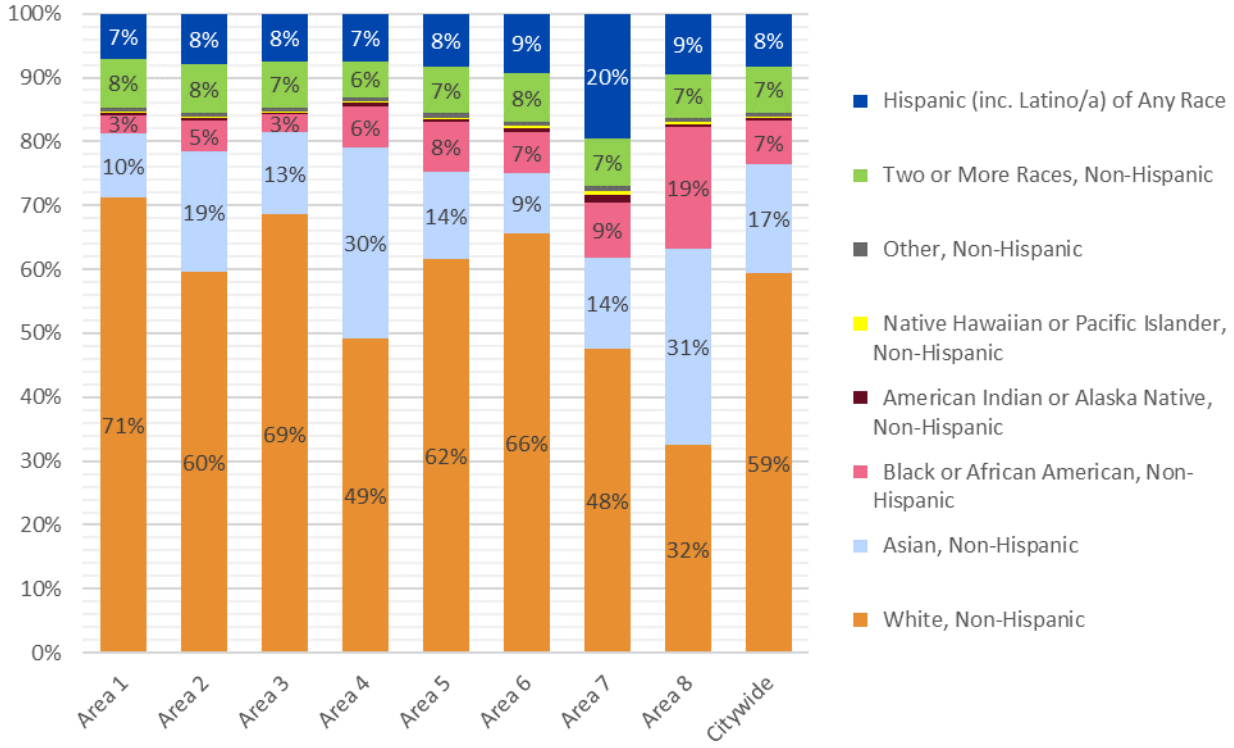
	Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Area 7	Area 8	Citywide
Population	151,708	148,334	68,927	63,298	108,053	93,220	8,767	94,708	737,015
Percent of total population	21%	20%	9%	9%	15%	13%	1%	13%	

Source: 2020 U.S. Census, Table P2: Hispanic or Latino, and Not Hispanic or Latino by Race; City of Seattle, 2023.

Race & Ethnicity

In 2020, approximately two in five Seattle residents (41%) and more than half of youth under 18 (51%) were people of color.[39] This includes all residents who identify as a race or ethnicity other than White Non-Hispanic.[40] As of 2020, 8% of Seattle residents identified as Hispanic or Latino, 7% as Black or African American, Non-Hispanic; 17% as Asian, Non-Hispanic, and more than 10% as Two or More Races, Non-Hispanic, as shown in **Exhibit 3.8-4**.

Exhibit 3.8-4. Shares of Population by Race and Ethnicity, 2020



Note: Percentage values less than 2% are not labeled for readability.
Sources: US Census (Table P2: Hispanic or Latino, and Not Hispanic or Latino by Race), 2020; City of Seattle, 2023.

[39] Source: 2020 U.S Census, Table P2: Hispanic or Latino, and Not Hispanic or Latino by Race.
[40] Note, the Census group people who identify as "Hispanic" and "Latino" in a single category. References to "Hispanic" in this report are inclusive of persons who identify as Latino or Latina.

The breakdown of population by race varies across the city, as shown in **Exhibit 3.8-4**. The percentage of population that identifies as White, Non-Hispanic ranges from 34% in Area 8 (Southeast Seattle) to 73% in Area 1 (Northwest Seattle). There is also variation by place type. About 67% of residents in Neighborhood Residential zones identify as White, Non-Hispanic, compared to 54% of residents living outside of these zones.[41]

Historical Context of Racial Segregation

Seattle and the Puget Sound Region have a long history of discrimination shaping where people of color could live, own property, and sustain their culture, beginning with the arrival of white European settlers in the Pacific Northwest in the 1840s. At that time, Washington was part of the Oregon Territory and therefore subject to Black exclusion laws, which effectively prohibited Black people from settling or owning property in the territory as a way of ensuring the region's early development was primarily white. In 1855, the Treaty of Point Elliott was signed, establishing tribal reservations and guaranteeing the Tribes hunting and fishing rights in exchange for ceding tens of thousands of acres of their land to European-American settlers. Just ten years later, one of the City of Seattle's first laws after incorporation (Ordinance 5) barred Native people from living within City limits unless employed by a non-Native person.

Exclusion and forced relocation of certain groups continued through the end of the 19th and into the 20th century with anti-immigrant, especially anti-Asian, policies: the 1882 Chinese Exclusion Act and subsequent anti-Chinese riots in Seattle; the Alien Land Law enshrined in Washington's first constitution that prohibited land ownership by "aliens ineligible for citizenship," targeting Asian people whom Congress ruled in 1875 could not become citizens; and forced incarceration of Japanese and Japanese-Americans during World War II. Displacement also resulted from various city building efforts. The creation of the Ship Canal and Ballard Locks in the 1910s lowered the level of Lake Washington by more than eight feet and caused the Black River, on which many Duwamish lived and depended for fishing, to disappear. The construction of Interstate 5 through downtown Seattle resulted in the loss of homes, businesses, and cultural anchors in the Chinatown–International District.

The 20th century saw both the public and private sector turn to land use and housing as tools to protect and concentrate property ownership and wealth within white communities. Zoning was one of the first contemporary practices used to establish and solidify exclusion. In the early 1900s, U.S. cities began to control the type and intensity of land use in cities across the U.S., with Los Angeles and New York as early adopters of standards to separate uses and regulate building form. Shortly after, first Baltimore and then other cities began employing zoning to segregate neighborhoods explicitly on the basis of race. After this practice was ruled unconstitutional in 1917, city officials substituted other 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.

[41] Sources: US Census (Table P2: Hispanic or Latino, and Not Hispanic or Latino by Race), 2020; City of Seattle, 2023.

While Seattle never had explicit racial zoning, its first zoning ordinance, adopted in 1923, was promoted by the City's own zoning commission as a way to prevent "lowering…the standard of racial strength and virility" and crafted by a planner who touted zoning's power to "preserve the more desirable residential neighborhoods" and prevent movement into "finer residential districts … by colored people." Before the advent of zoning, Seattle's building code regulated development, and dwellings with multiple families were allowed citywide. The 1923 zoning ordinance established and mapped the "First Residence District" where only "detached buildings occupied by one family" were allowed. In the subsequent decades, periodic downzoning expanded the extent of restrictive zoning into areas that previously allowed a mix of housing types. For a century, zoning in Seattle has curtailed access to many neighborhoods by barring lower-cost, denser housing like apartments, thus raising the financial bar to afford housing and reinforcing racial segregation since people of color have disproportionately lower incomes and less wealth due to structural racism.

Furthering this pattern of exclusion were racially restrictive covenants, the use of which arose in response to the Supreme Court's ruling on municipal racial zoning. Racial covenants were enforceable contract language written into deeds, plats, and homeowners association bylaws restricting the sale and use of property based on someone's race, ethnicity, and religion. As some residential areas began to diversify in the 1910s, racial covenants became widespread in Seattle, especially after the Supreme Court validated their use in 1926. Many neighborhoods prohibited the sale or occupancy of property to Asian Americans, Jewish people, and Black people, or even more broadly to anyone "other than one of the White or Caucasian race." One such covenant for the Windermere neighborhood said, "No person or persons of Asiatic, African or Negro blood, lineage or extraction, shall be permitted to occupy a portion of said property, or any building thereon; except domestic servant or servants may be actually and in good faith employed by white occupants of such premises." This practice excluded people of color from much of Seattle and from the opportunity to pursue homeownership, which was emerging in the 20th century as a common pathway to stability and wealth.

Alongside private deeds defining where people of color could not live, the Federal practice of redlining rendered them ineligible for government-backed home mortgages in the few areas where they could. As the U.S. emerged from the Great Depression, the National Housing Act was adopted in 1934 to boost housing stability and expand homeownership by underwriting and insuring home mortgages. To determine eligibility for those loans and delineate ideal areas for bank investment, the Home Owners Loan Corporation (HOLC), a Federal agency, created maps that appraised the creditworthiness of entire neighborhoods based in part on their racial composition. Areas deemed too risky for mortgage lending were shaded in red or "redlined," with a rationale explicitly referencing their racial composition. The neighborhood of Windermere, for example, was touted as "protected…by racial restrictions," while the Central Area redlined because "it is the Negro area of Seattle" and "composed of mixed nationalities." In appraisal standards that undergirded its lending decisions, the Federal Housing Administration (FHA) also employed a "whites-only" requirement, making racial segregation an official requirement of the federal mortgage insurance program and depriving people of color of the opportunity to own a home and build and pass on wealth.

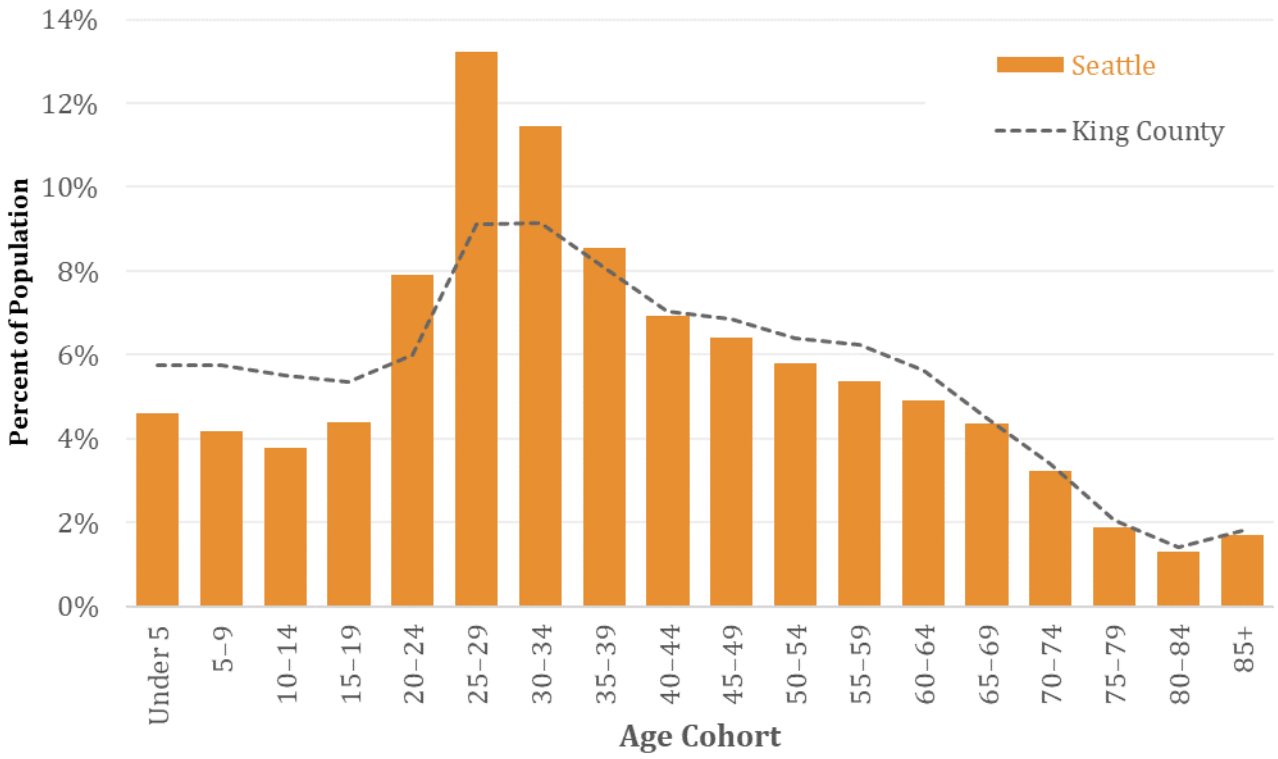
Informal practices and unwritten rules also contributed to housing discrimination. Real estate agents typically didn't show houses in predominantly white neighborhoods to people of color, and, even if they did, purchasing that housing was difficult for a buyer of color. Discrimination in the sale or rental of housing was legal until Congress passed the Fair Housing Act in 1968. But earlier in the decade, local discussions had begun of a potential City ordinance prohibiting housing discrimination. In 1963, Seattle's newly created Human Rights Commission drafted an open housing ordinance with criminal penalties for acts of housing discrimination on the basis of race, ethnic origin, or creed. The City Council referred the legislation to a public vote. Opponents organized and advertised heavily, and in March 1964 the measure failed two-to-one. Seattle eventually adopted Open Housing legislation in 1968, extending its protections against discrimination first in 1975 and as recently as 2017 to other identities and groups.

The legacy of these practices persists in several quantifiable ways that reveal where lasting exclusion and inequality remain. In areas with NR zoning where detached homes predominate, residents are disproportionately White, Non-Hispanic. Households of color generally and Black households in particular are much less likely to own their home compared to White, Non-Hispanic households (35% and 26% compared to 51%, respectively), and in recent years homeownership among people of color has declined faster than for white households, especially for Black households, whose homeownership rate dropped from 37% in 1990 to 23% in 2020. Similarly, Black households in Seattle today are twice as likely as white households to have zero or negative net worth (17.7% versus 33.1%, respectively). These and myriad other disparities originated in the explicit racism of the 19th and 20th centuries, hardened through 100 years of exclusionary zoning, and today persist in large part due to the market pressures of an increasingly unaffordable city.

Age Profile

Exhibit 3.8-5 shows Seattle's population by age range in 2020, with comparison to the age profile of King County. Seattle has a notably higher concentration of young adults, with about a third of its total population in the 19- to 34-year-old range. King County as a whole has a slightly greater share of its population under age 19 or between 45 and 64.

Exhibit 3.8-5. Shares of Population by Age in Seattle and King County, 2020

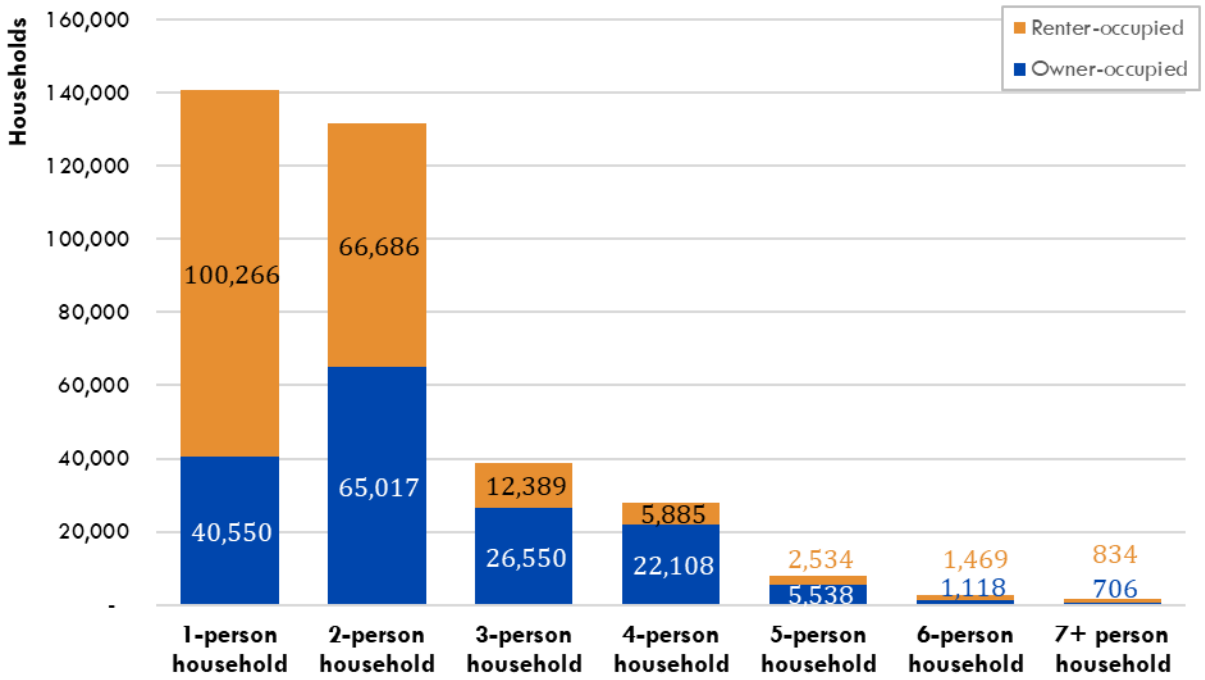


Source: ACS 5-Year Estimates, 2016-2020.

Household Characteristics

In 2021, Seattle had 337,361 households, with an average household size of 2.08.[42] After declines between 1980 and 2000, household size in Seattle has remained relatively steady over the last two decades. In 2021, about 45% of housing units were owner-occupied and 55% renter-occupied,[43] while in 2010 about 49% of households owned their homes.[44] This decline in homeownership rate is at least partly a reflection of new housing in Seattle, three-quarters of which are apartments (see **Exhibit 3.8-7**, below). **Exhibit 3.8-6** breaks down all households in Seattle by tenure and household size. More than three-quarters of Seattle households have only one or two members.

Exhibit 3.8-6. Households by Tenure and Household Size, 2021

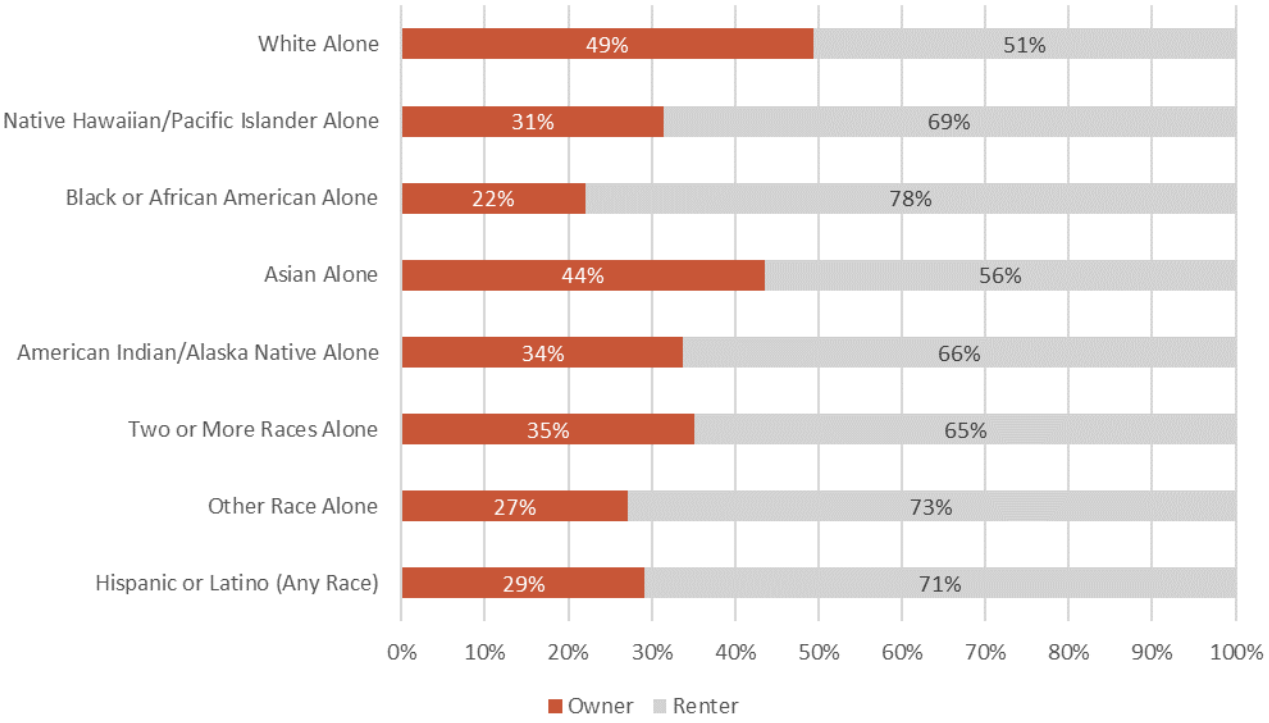


Sources: ACS 5-Year Estimates, 2017-2021 (Table B25009: Tenure by Household Size); BERK, 2023.

Homeownership bestows important benefits for stabilizing housing costs and providing long-term wealth generation potential. However, considerable disparities exist in Seattle's homeownership rate by householder race and ethnicity, as shown in **Exhibit 3.8-7**. Nearly half (49%) of White households in Seattle are homeowners, compared to only 22% of Black households and 29% of Hispanic or Latino households.

[42] Source: American Community Survey 5-Year Estimates (2017-2021): S1101 Households and Families
[43] Source: American Community Survey 5-Year Estimates (2017-2021): B25003: Tenure
[44] Source: American Community Survey 5-Year Estimates (2006-2010): B25003: Tenure

Exhibit 3.8-7. Housing Tenure by Householder Race and Ethnicity, 2021

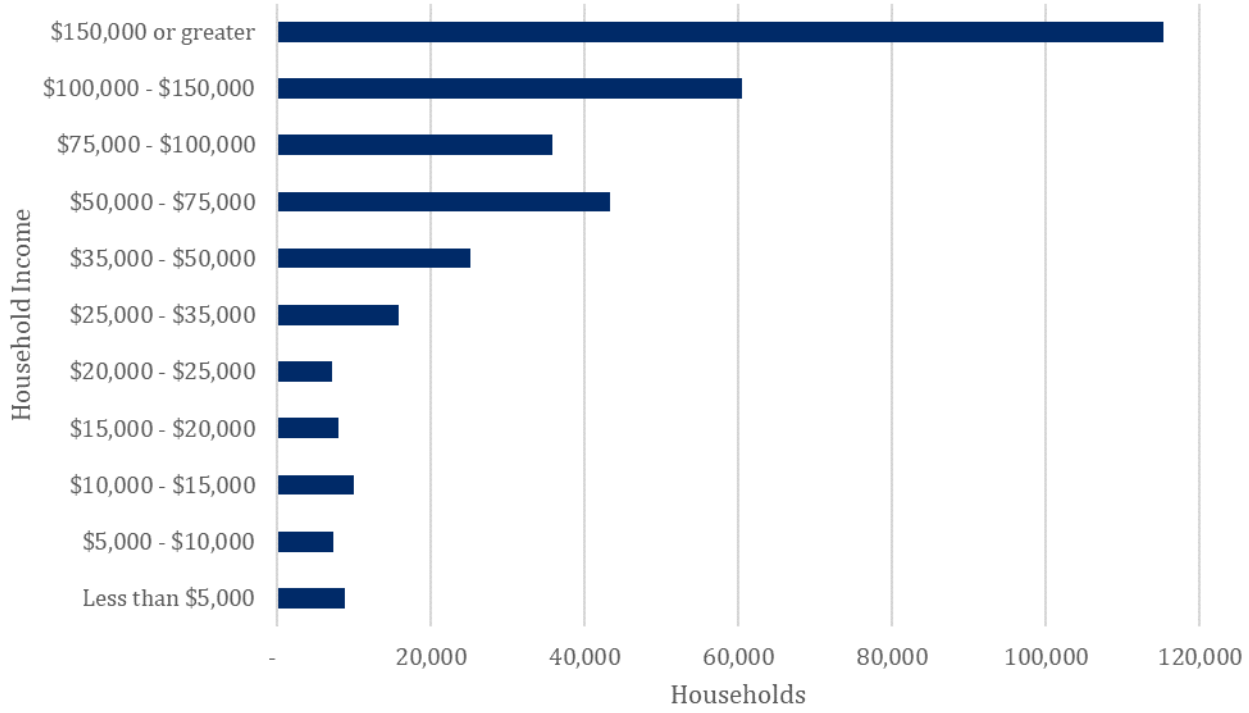


Sources: ACS 5-Year Estimates, 2017-2021 (Table S2502: Demographic Characteristics for Occupied Housing Units); BERK, 2023.

In 2021, the median income of all households in Seattle was $105,391.[45] **Exhibit 3.8-8** shows the distribution of Seattle households by income level. **Exhibit 3.8-9** shows the wide variation in incomes by race and ethnicity of householder. The median income for both Black households and American Indian or Alaskan Native households is less than half that of non-Hispanic White and Asian households.

[45] Source: American Community Survey 5-Year Estimates (2017-2021): S1901 Income in the past 12 months (in 2021 inflation-adjusted dollars).

Exhibit 3.8-8. Seattle Households by Income Level, 2021



Sources: ACS 5-Year Estimates, 2017-2021, Table S1901: Income in the past 12 months (in 2021 inflation-adjusted dollars); BERK, 2023.

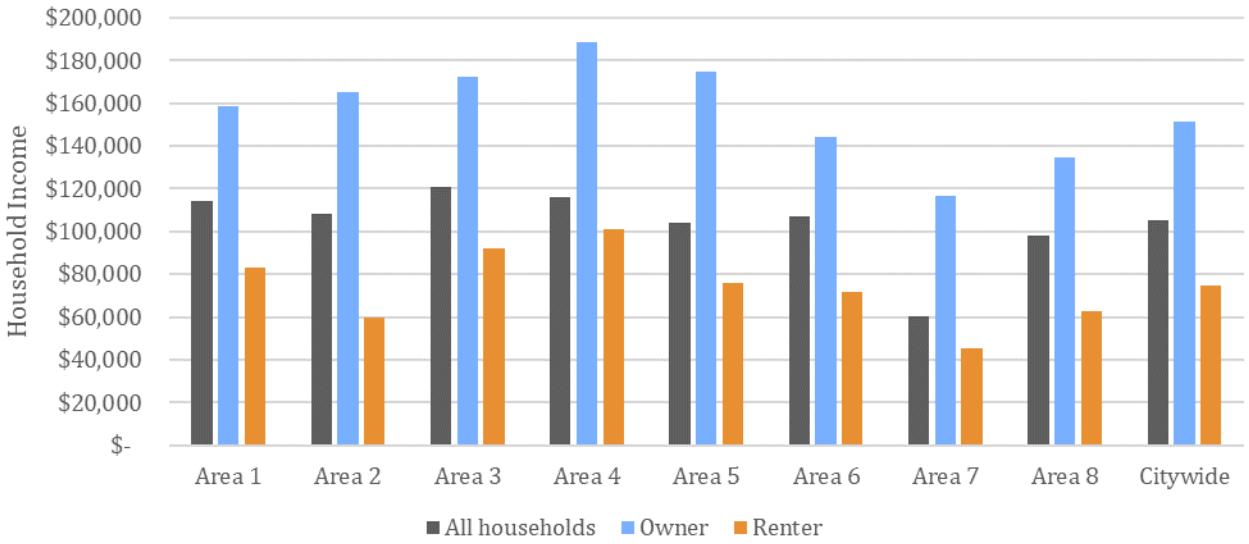
Exhibit 3.8-9. Median Income by Householder Race or Ethnicity, 2021



Sources: ACS 5-Year Estimates, 2017-2021, Table B19013: Median Household Income in the past 12 months (in 2021 Inflation-Adjusted Dollars); BERK, 2023.

Household income also varies substantially across the city and by tenure. **Exhibit 3.8-10** below shows median household income for owner, renter, and all households by analysis area. For all households, average income ranges from $60,000 for the roughly 3,500 occupied units in Area 7 (Port of Seattle and Harbor Island) to more than $180,000 in Area 4 (Downtown Seattle), which has about 40,000 occupied units. Citywide, the median income of owner households ($151,430) is more than twice the median income of renter households ($74,580).

Exhibit 3.8-10. Median Household Income by Tenure and EIS Analysis Area, 2021

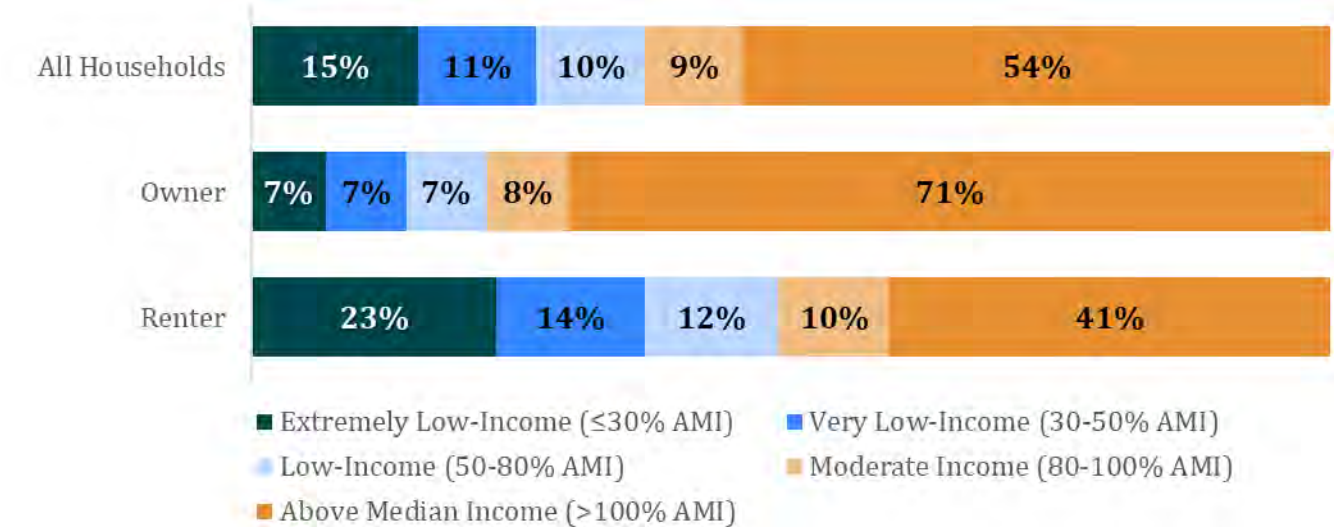


Sources: ACS 5-Year Estimates, 2017-2021 (Table B25119: Median Household Income the past 12 months (in 2021 inflation-adjusted dollars) by Tenure); City of Seattle, 2023; BERK, 2023.

The 2022 HUD Median Family Income (also known as Area Median Income, or AMI) in the Seattle metropolitan area was $134,600.[46] AMI is typically higher than median income reported by the ACS because AMI is based only on the incomes of family households (which may have multiple working-age adults rather than a single person living alone) and is projected forward to the current year. Income limits are typically set relative to AMI when determining eligibility for income-restricted affordable housing. These income limits are also adjusted for household size. **Exhibit 3.8-11** presents the percentage of all households by income level relative to AMI and by tenure. It shows significant income disparities between owner and renter households, with a much higher percentage of owner households having incomes above AMI.

[46] Source: HUD, 2022. https://www.huduser.gov/portal/datasets/il/il2022/2022MedCalc.odn.

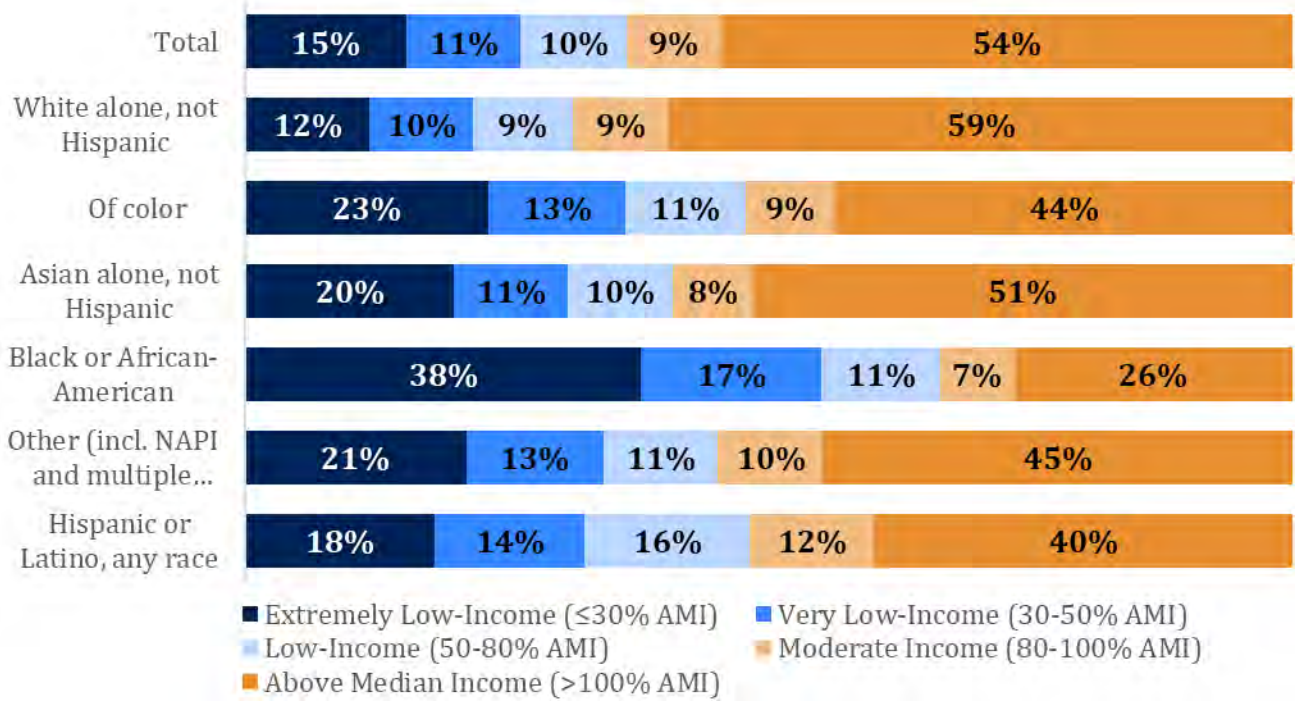
Exhibit 3.8-11. Household Income Level by Tenure, 2015-2019



Sources: US HUD CHAS data, 2015–2019; BERK, 2023.

Household income in Seattle varies considerably by race and ethnicity, as shown in **Exhibit 3.8-12**. As of 2019, only 41% of White, non-Hispanic households had incomes below AMI, compared to 74% of Black or African American households and 64% of all households of color.

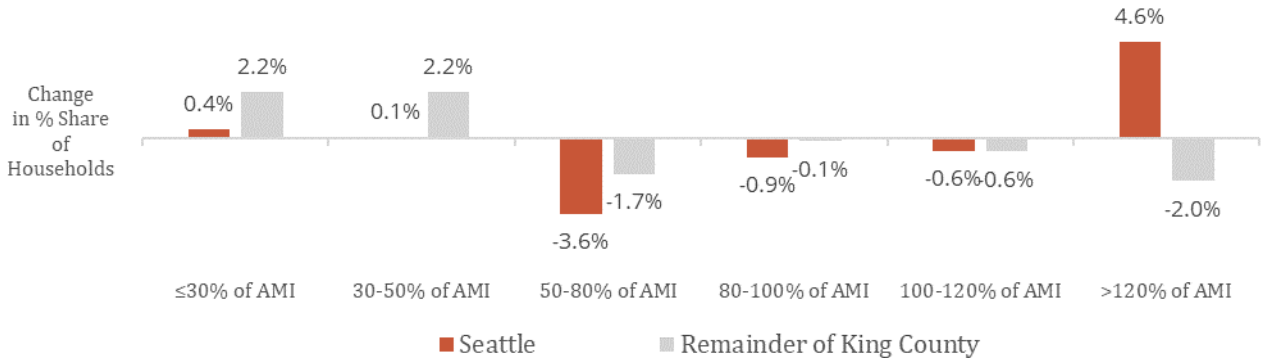
Exhibit 3.8-12. Household Income Level by Race and Ethnicity, 2019



Sources: US HUD CHAS data, 2015–2019; BERK, 2023.

Over the past decade, the distribution of households by income level has changed. **Exhibit 3.8-13** shows the percent change in share of households by income level in both Seattle and the remainder of King County.[47] It shows that much of the increase in new households in Seattle has been among those at the highest income level, while the remainder of King County saw a reduction in the share of these households. During the same period, the share of households with incomes between 50% and 120% of AMI declined in both Seattle and the remainder of King County, although the declines among 50-80% AMI households were much more significant in Seattle. The lowest income bands (0-50% AMI) remained mostly steady in Seattle as a share of total households but increased dramatically in the remainder of King County. These trends suggest that lower-income households are increasingly looking to the remainder of King County for housing, possibly due to the lack of affordable options in Seattle.

Exhibit 3.8-13. Change in Household Income Distribution 2010 5-Year Period to 2019 5-Year Period, Seattle and Remainder of King County



Source: CHAS tabulations of 2006-2010 and 2015-2019 ACS 5-year estimates, U.S. Census Bureau and HUD.

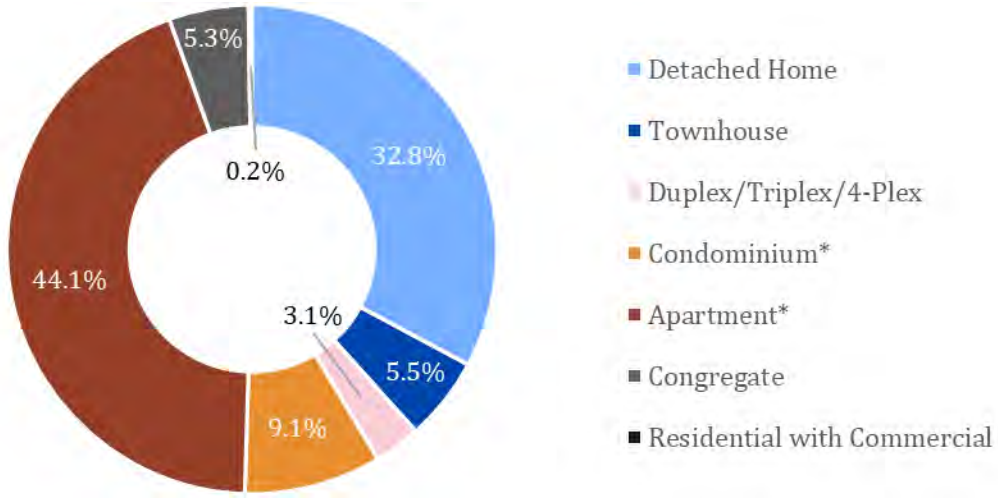
Housing Supply

As of 2022, Seattle had 385,745 housing units and 21,402 congregate residences, such as dormitories, group homes, and certain kinds of senior housing. **Exhibit 3.8-14** breaks down Seattle's housing inventory by type. More than three-quarters of all homes are detached homes (33%) and apartments (44%).

Between 2018 and 2022, more than 46,000 new housing units were built in Seattle.[48] **Exhibit 3.8-15** breaks down these newly constructed homes by housing type. More than three-quarters were apartment units, while townhouses and accessory dwelling units (ADUs) combined comprised 17% of the new inventory. Detached homes accounted for 5%.

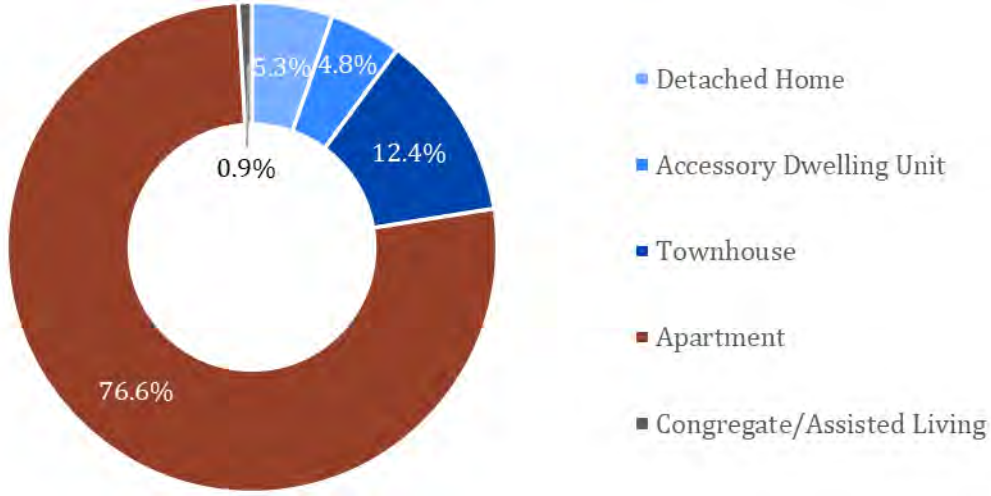
[47] Note that this chart does not show the absolute percentage gain or loss of households by income level. Rather it shows the change in percentage share of total households. So, for example, Seattle may have had a slight decline in share of households at 100-120% AMI while seeing a growth in the total number of these households overall.
[48] Source: Seattle OPCD summary of permit completions from Department of Construction and Inspections, Permit Tracking System. Residential Permitting Trends, 2023.

Exhibit 3.8-14. Housing Unit Inventory by Housing Type, 2022



Note: Condominiums in apartment use are categorized as apartments in this summary. Duplex/Triplex/4-Plex refers to all lots with 2-4 units that are not unit lot subdivided. This includes a combination of detached and attached units.
Sources: King County Department of Assessments, compiled by City of Seattle, July 2022; BERK 2023.

Exhibit 3.8-15. Units in Completed Housing Permits by Housing Type, 2018-2022



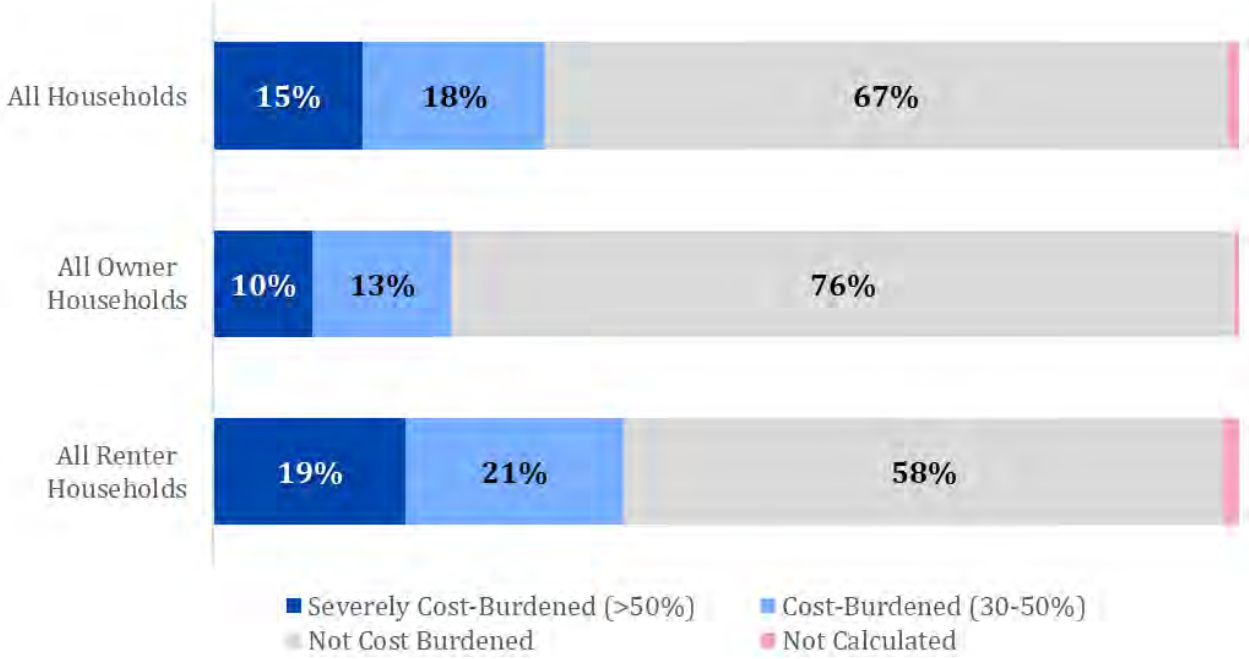
Sources: Seattle OPCD summary of permit completions from Department of Construction and Inspections, Permit Tracking System. Residential Permitting Trends, 2023; BERK, 2023.

Housing Affordability

The affordability of housing depends on two factors: the cost of the housing and the income of the household living there. A broadly used standard considers housing costs that consume 30% or less of a household's income to be affordable. Households paying more than 30% of their gross income for housing costs may have difficulty affording necessities such as food, clothing, transportation, and medical care. HUD considers households to be "cost burdened" if they spend more than 30% of their gross income on housing costs and "severely cost burdened" if they spend more than 50%.

The most recent data about housing cost burden reflects conditions between 2015 and 2019. During that period, about one-third of all Seattle households were cost-burdened, and 15% of all households were severely cost-burdened. Renter households were almost twice as likely to be cost-burdened than owner households, as shown in **Exhibit 3.8-16**.

Exhibit 3.8-16. Proportion of Households by Cost Burden Status and Housing Tenure, 2019



Note: "Not Calculated" refers to households with no or negative income, and therefore degree of cost-burden cannot be calculated.
Sources: US HUD CHAS data, 2015–2019; BERK, 2023.

Rental Housing Affordability

Exhibit 3.8-17 breaks down renter household cost burden by income category. Not surprisingly, households with incomes at or below 50% AMI were most likely to experience cost burden. More than four out of five of these households were cost burdened, including those with no or negative income. Though these very low- and extremely low-income households represent 36% of all households, they represent 70% of cost-burdened households, suggesting substantial need to production and access to affordable housing for this segment of the population.

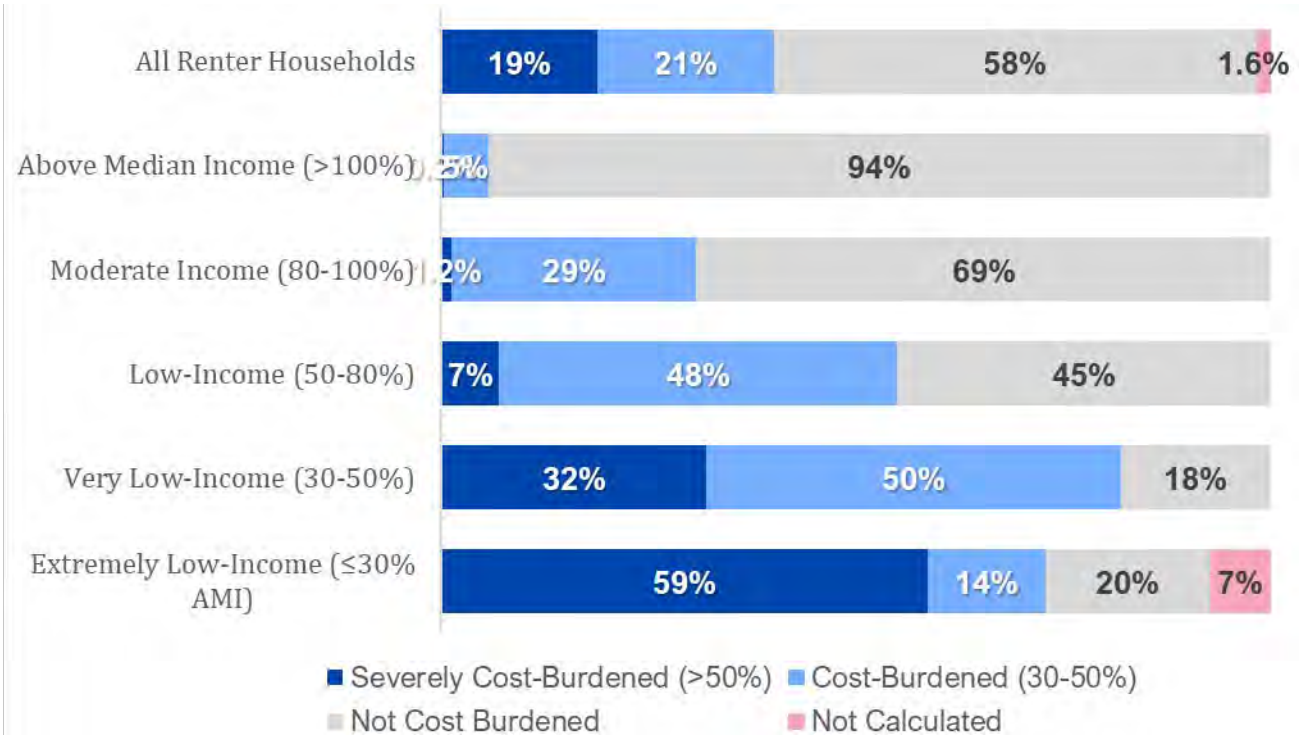
More than half of low-income renter households (50-80% AMI) were cost-burdened, and even in the moderate-income category (80-100% AMI), about a third of renter households experienced cost burden. We can conclude that gaps in affordable rental housing availability exist up to median family income levels. See **Exhibit 3.8-18**.

Exhibit 3.8-17. Renter Households by Income Level and Cost Burden Status, 2019

Income category (% of AMI)	Not cost burdened	Cost burdened (30-50% of income)	Severely cost burdened (>50% of income)	Not calculated	Total households
Extremely low-income (≤30%)	8,110	5,805	23,895	2,955	**40,760**
Very low-income (30-50%)	4,505	12,450	7,970	0	**24,925**
Low-income (50-80%)	9,975	10,655	1,545	0	**22,175**
Moderate-income (80-100%)	12,865	5,475	230	0	**18,570**
Above median income (>100%)	69,540	3,980	155	0	**73,675**
All renter households	**104,995**	**38,365**	**33,795**	**2,955**	**180,105**

Note: "Not calculated" refers to households with no or negative income, and therefore degree of cost-burden cannot be calculated.
Source: US HUD CHAS data, 2015–2019.

Exhibit 3.8-18. Share of Renter Households by Income Level and Cost Burden Status, 2019

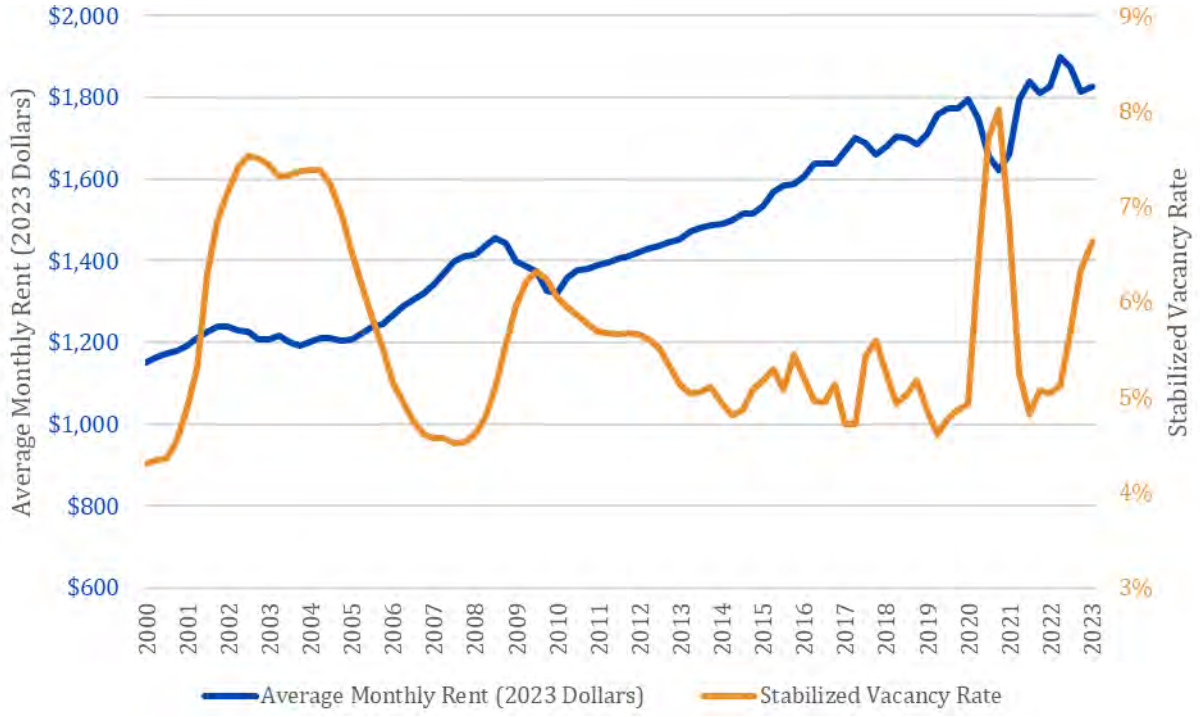


Note: "Not Calculated" refers to households with no or negative income, and therefore degree of cost-burden cannot be calculated.
Source: US HUD CHAS data, 2015–2019; BERK, 2023.

Substantial increases in rents are a key reason for the rise in the share of renter households that are cost burdened. Between 2012 and 2022, average monthly rents rose 32% after adjusting for inflation, from $1,430 to $1,897. Market housing rents typically rise when housing supply is insufficient to meet high demand. In Seattle, high housing demand is being driven in

large part by rapid job growth in Seattle and increased household preferences for in-city living. **Exhibit 3.8-19** shows inflation-adjusted rents in 2023 dollars and the stabilized rate of apartment vacancy.[49] Over the past 23 years, rents have increased most steeply during or slightly after periods when vacancy rates dipped to around 5% or lower. This is visible from 2000 to 2001, 2006 to 2009, 2012 to early 2020, and much of 2021.

Exhibit 3.8-19. Average Monthly Rent and Vacancy Rate, 2000-2022



Note: Rents are adjusted for inflation and are shown in 2023 dollars. The stabilized vacancy rate excludes properties that were still new and in the lease-up stage to ensure the sample is more representative of the full renter housing market.
Sources: CoStar, 2023; BERK, 2023.

Market rents typically vary by the age of the structure. **Exhibit 3.8-20** shows the affordability of apartment rents by age of structure and analysis area, as a percentage of AMI. On average, older apartments are more affordable than newer units. Citywide, the median rent for a one-bedroom apartment in a building constructed before 1994 is affordable at 57% AMI, compared to 86% AMI in newer buildings constructed after 2013.

[49] The stabilized vacancy rate excludes properties that were still new and in the lease-up stage to ensure the sample is more representative of the full rental housing market.

Exhibit 3.8-20. Percent of AMI Needed to Afford a Median Rent for a One-Bedroom Apartment by Year Built and EIS Analysis Area

	Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Area 7	Area 8	Citywide
All apartments	76%	65%	73%	91%	76%	69%	28%	71%	77%
Built 2013-2023	84%	74%	80%	98%	82%	79%	39%	79%	86%
Built prior to 1994	52%	54%	61%	70%	61%	57%	28%	52%	57%

Note: Percent AMI calculation assumes 1.5 person household, consistent with HUD methodology (Joice 2014).
Source: CoStar, 2023; City of Seattle, 2023; BERK, 2023.

Ownership Housing Affordability

Homeownership costs are far out of reach for the vast majority of Seattle and King County households. Most owner households in Seattle live in detached homes, the median sales price of which was $1,060,000 in 2022, as shown in **Exhibit 3.8-21**. Assuming a 20% down payment ($212,000)—which already excludes many households lack these resources—a household needs an annual income of at least $261,499 to afford this median-priced home. For a four-person household this is equivalent to 194% of AMI. A lower down payment would increase the income necessary to afford such a home.

Exhibit 3.8-21. Summary of Detached and Townhouse Sales Prices, 2022

	75th percentile sales price	Median sales price	25th percentile sales price	Average number of bedrooms	Assumed household size for AMI	Household Income required to purchase median home (% AMI)
Detached homes	$1,495,000	$1,060,000	$835,000	3.31	4	194%
Townhouses	$975,000	$816,250	$709,950	2.65	3	166%

Note: Affordability estimates assume 20% down payment and assumed household size. For households who lack the 20% down payment, the percentage of AMI needed to buy the home would be higher.
Sources: King County Assessor, 2023; City of Seattle, 2023.

The cost of housing varies by age. **Exhibit 3.8-22** shows the average affordability of detached homes by age of structure and analysis area as a percentage of AMI. The lowest value is for older homes (built before 1994) in Area 7, where the median sales price is equivalent to 122% of AMI. While older homes cost less than newer homes, in no area of the city is an older median value detached home affordable for a moderate-income household (80-120% AMI).

Exhibit 3.8-22. Percentage of AMI Needed to Afford a Median-Price Detached Home by Year Built

	Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Area 7	Area 8	Citywide
All detached homes	202%	202%	284%	276%	280%	163%	117%	155%	194%
New homes (built 2013-2023)	343%	312%	454%	237%	367%	227%	169%	209%	299%
Older homes (built before 1994)	192%	187%	264%	277%	257%	155%	110%	147%	182%

Note: Affordability level calculation assumes availability of a 20% down payment and 4-person household. For households who lack the 20% down payment, the percentage of AMI needed to buy the home would be higher.
Sources: King County Assessor, 2023; City of Seattle, 2023; BERK, 2023.

About 9% of Seattle's housing stock are condominiums that can also provide homeownership options. Most condominiums are in multifamily buildings similar to apartments. In 2022, the median sales price for this type of condominium in Seattle was $512,500. A household would need an annual income of at least $126,432 to afford this condo, assuming availability of a 20% down payment ($102,500). For a two-person household, this is equivalent to 117% of AMI.[50] Households that do not have $102,500 for a down payment would require higher income to afford the median-priced condo.

In recent years many new detached homes have included one or two accessory dwelling units on the same lot. These principal and accessory units are sometimes sold separately as a condominium units. In this study, these kinds of condominiums are referred to as non-stacked housing to differentiate them from condominiums that are stacked vertically in multistory buildings. **Exhibit 3.8-23** summarizes all non-stacked condominium units sold in 2022 by unit size. The affordability of these units is closely correlated with unit size, though even the 25th percentile sales price for small units was not affordable to moderate-income households.

[50] Since income thresholds are adjusted for household size, a smaller household (e.g., 1 or 2 people) would require a greater percentage of AMI to afford this purchase price.

Exhibit 3.8-23. Summary of Non-Stacked Homes Sold in 2022 by Unit Size

	Over 2,000 Sq. Ft.	>1,200-2,000 Sq. Ft.	≤1,200 Sq. Ft.
Number of units sold	378	111	114
Average sale price	$1,987,014	$1,044,382	$754,627
Average size (square feet)	3,114	1,624	995
Average number of bedrooms	3.96	3.05	2.10
Assumed household size for affordability analysis	4	4	3
75th percentile sales price	$2,499,999	$1,200,000	$825,000
Median sales price	$1,800,000	$981,000	$757,500
25th percentile sales price	$1,400,000	$787,950	$678,713
Household income required to purchase median home (% AMI)			
75th percentile sales price	458%	220%	168%
Median sales price	330%	180%	154%
25th percentile sales price	**257%**	**144%**	**138%**

Note: Affordability level calculation assumes availability of a 20% down payment and assumed household size. For households who lack the 20% down payment, the income needed to buy the home would be higher.
Sources: King County Assessor, 2023; City of Seattle, 2023; BERK, 2023.

The housing costs of many owner households exceeds HUD's definition of affordability. As shown in **Exhibit 3.8-24,** more than 35,000 owner-occupied households were cost burdened between 2015 and 2019,nearly a quarter of all owner-occupied households in Seattle. A much larger share of lower-income owner-occupied households experienced housing cost burden than households with incomes above AMI.

Exhibit 3.8-24. Owner-Occupied Households by Cost Burden Status, 2019

Income category (% of AMI)	Not cost burdened	Cost burdened (30-50% of income)	Severely cost burdened (>50% of income)	Not calculated	Total households
Extremely low-income (≤30%)	1,325	1,670	6,625	815	10,435
Very low-income (30-50%)	4,090	2,970	4,225	0	11,285
Low-income (50-80%)	6,260	3,225	1,825	0	11,310
Moderate-income (80-100%)	6,730	3,825	1,025	0	11,580
Above median income (>100%)	97,355	8,775	990	0	107,120
All owner households	**115,760**	**20,465**	**14,690**	**815**	**151,730**

Note: "Not calculated" refers to households with no or negative income, and therefore degree of cost-burden cannot be calculated.
Source: US HUD Comprehensive Housing Affordability Strategy (CHAS) data, 2015–2019.

Displacement

Displacement refers to a process wherein households are compelled to move from their homes involuntarily due to the termination of their lease, rising housing costs, or other factors. This is a different phenomenon than when a household voluntarily makes a choice to move from their home. Three kinds of displacement are occurring in Seattle. Physical displacement is the result of eviction, acquisition, rehabilitation, or demolition of property, or the expiration of covenants on rent- and income-restricted housing. Economic displacement occurs when residents can no longer afford rising rents or the costs of homeownership like property taxes. Cultural displacement occurs when residents are compelled to move because the people and institutions that make up their cultural community have left or are leaving the area.

The City has some data related to the physical displacement of lower income households with incomes earning up to 50% of AMI. Economic displacement is much more difficult to measure directly. Analysis of census data can provide important insights and a sense of the extent of displacement that is likely occurring. No formal data currently exists to measure cultural displacement quantitatively, despite signs that it is occurring in some neighborhoods. Previous studies have examined changes in cultural populations over time at a neighborhood level, like the sustained and significant loss of Black residents in the Central Area (Seattle OPCD, 2016; City of Seattle, 2017), and more recent data suggests that these trends are continuing. These phenomena are interrelated, and cultural displacement can result from and accelerate physical and/or economic displacement, with root causes in the rising cost of housing and real estate and income and wealth inequality.

Physical Displacement

Various circumstances can cause physical displacement. These circumstances include demolition of existing buildings to enable the construction of new buildings on the same site, rehabilitation of existing buildings, and expiration of rent restrictions. Strong demand for housing can encourage demolition to create new housing and the rehabilitation of existing buildings to attract higher-income tenants. Between 2015 and 2022, an average of 629 housing units were demolished each year.[51] However, not all demolitions resulted in the displacement of a household. For example, in some cases the owner-occupant of a home chose to sell the home to a developer or demolished it themselves to build a larger home.

The best data available about households that experienced physical displacement in Seattle comes from records of households eligible for tenant relocation assistance.[52] Seattle's Tenant

[51] Source: City of Seattle Department of Construction and Inspections, Permit Tracking System, 2023. Note that this data underestimates total demolition because some demolition permits never get "finaled" despite the demolition occurring. So, the permit ultimately expires without being counted.

[52] Not all households eligible for relocation assistance complete the TRAO application process. Factors complicating the process to complete a TRAO application may include language barriers or mental health. Data on the rate at which TRAO-eligible households complete the application process is not available. It should also be noted that TRAO data does not include all instances of eviction. Therefore, eviction as a cause of physical displacement is beyond the scope of this analysis. Furthermore, no information is available regarding what portion of households receiving TRAO are able to find other housing in the neighborhood or city. However, it is likely that many households displaced from a building also leave the neighborhood or city.

Relocation Assistance Ordinance (TRAO) requires developers to pay relocation assistance to tenants with incomes at or below 50% of AMI who must move because their rental will:

- Be torn down or undergo substantial renovation
- Have its use changed (for example, from apartment to a commercial use or a nursing home)
- Have certain use restrictions removed (for example a property is no longer required to rent only to low-income tenants under a Federal program)

Between 2015 and 2022, 1,200 households were eligible to receive assistance through TRAO, as shown in **Exhibit 3.8-25**. This was about 171 households per year on average, or about 2.6 out of every 1,000 renter households with incomes at or below 50% AMI.[53] Just over half of these displacements were due to the demolition of a housing unit, with substantial rehabilitation being the next most common cause.

Exhibit 3.8-25. Cause of Displacement among TRAO-Eligible Households, 2015-2022

EIS Analysis Area	Demolition	Substantial rehabilitation	Removal of use restrictions or change of use	Total
Area 1	126	77	—	203
Area 2	171	87	67	325
Area 3	56	49	1	106
Area 4	27	27	16	70
Area 5	113	126	16	255
Area 6	34	52	—	86
Area 7	16	15	—	31
Area 8	77	47	—	124
Total	**620**	**480**	**100**	**1,200**
% of total	**52%**	**40%**	**8%**	

Sources: Seattle Department of Construction & Inspections, 2023; BERK, 2023.

On average, about 14% of units demolished each year result in a TRAO-eligible displacement.[54] However, TRAO records do not cover every instance of physical displacement caused by demolition of a rental unit. For example, the program does not track displacement of households with incomes above 50% of AMI. In addition, until recently the program did not have mechanisms to deter developers from economically evicting tenants prior to applying for a permit to avoid paying relocation benefits, nor did it provide additional assistance to ensure households with language or other barriers can successfully navigate the application process.

[53] Source: US HUD Comprehensive Housing Affordability Strategy (CHAS) data, 2015-2019; BERK, 2023.
[54] Source: City of Seattle Department of Construction and Inspections, Permit Tracking System, 2023 and BERK calculations. Note that permit data underestimates total home demolition because some demolition permits never get "finaled" despite the demolition occurring. So, the permit ultimately end up expiring and not being counted. Therefore, the percent~~%~~age of demolished units that result in TRAO-eligible displacement is likely to be lower.

Finally, this data does not reflect the physical displacement of SHA tenants who receive relocation benefits outside of the TRAO process, generally relating to the redevelopment of public housing.

Economic Displacement

As discussed in the housing affordability section, market-rate housing costs are largely driven by the interaction of supply and demand in the regional housing market. Lower-income households living in market-rate housing are at greater risk of economic displacement when housing costs increase. This vulnerability disproportionately impacts households of color, whose incomes tend to be lower compared to non-Hispanic white households, as shown in **Exhibit 3.8-9**. This is particularly true for Black and Indigenous households, which have the lowest median household income among all major racial and ethnic groups. These disparities are rooted in the history described earlier of redlining, racially restrictive covenants, and other forms of discrimination that contributed to racialized housing patterns and long-lasting wealth inequality. This history, the economic disparities that remain to this day, and racial bias in the real estate, finance, and development systems together result in greater risks of economic displacement among communities of color (Seattle OPCD, 2016).

At the citywide scale, new housing development is critical for addressing Seattle's housing shortage. Increasing housing supply reduces the upward pressure on housing costs that otherwise results when a growing population competes for a finite number of homes. Given Seattle's historic underproduction of housing relative to demand and population growth, a substantial expansion of housing supply is necessary to address economic displacement pressures.

At a neighborhood level, however, the relationship between new development and displacement pressure is less straightforward and can vary in different types of neighborhoods. Growth can increase housing choices and support creation of income-restricted affordable housing, both of which make a neighborhood more accessible to low- and moderate-income households, particularly in areas where housing costs are very high and access has historically been limited for lower-income households and households of color. However, development can also contribute to economic displacement pressure at a local scale if new housing increases the desirability of a neighborhood, attracts higher-income households and businesses catering to them, and rents and home prices rise as a result.

The City has previously examined the historical relationship at a neighborhood scale between housing growth and changes in low-income households (Appendix M of Mandatory Housing Affordability Final EIS). This section presents an updated version of this statistical analysis, which compares the amount of market-rate housing production in a Seattle census tract between 2010 and 2017 to the gain or loss of households at a particular income level in that census tract during that time. For each income level, **Exhibit 3.8-26** presents correlation coefficients that represent the strength of the relationship between market-rate housing production and the change in households. Market-rate housing production is calculated as total net housing units permitted between 2010 and 2017 minus income-restricted affordable housing built during that period. Coefficients have a range of -1 to 1. The closer the coefficient

value is to 1 or -1, the stronger the relationship, while coefficients closer to 0 have a weaker relationship. For instance, a value of ±0.7 indicates a strong relationship between variables. A value of ±0.5 indicates a moderate relationship. A value of ±0.3 indicates a weak relationship.

Exhibit 3.8-26. Correlation between Market-Rate Housing Production and Changes in Households by Income Level, 2010-2017

Household income	Correlation coefficient
0-30% AMI	0.12
0-50% AMI	0.22
0-60% AMI	0.18
0-80% AMI	0.19
50-80% AMI	-0.03
60-80% AMI	0.03
80-120% AMI	0.45
>120% AMI	0.81

Sources: HUD CHAS (based on ACS 5-year estimates 2008-2012 and 2005-2019); City of Seattle, 2023; King County, 2023

Overall, **Exhibit 3.8-26** and the scatterplot of the same data shown in **Exhibit 3.8-27** show that housing production tends to have a weak positive relationship with changes in low-income households at the neighborhood scale. This means that census tracts with relatively higher market-rate housing production during the 2010-2017 period were somewhat more likely than tracts with less housing production to retain or gain low-income households. The strength of this relationship varies when looking at specific income bands. For example, when focusing on households with incomes of 50-80% AMI, there is essentially no statistically significant relationship (positive or negative) between housing production and change in the number of these households between 2010 and 2017 (see **Exhibit 3.8-28**). This suggests that factors other than housing production may be affecting Seattle's ability to retain households at this income level.

Exhibit 3.8-27. Correlation between Market-Rate Housing Production and Changes in Households with Incomes of 0-50% of AMI, 2010-2017

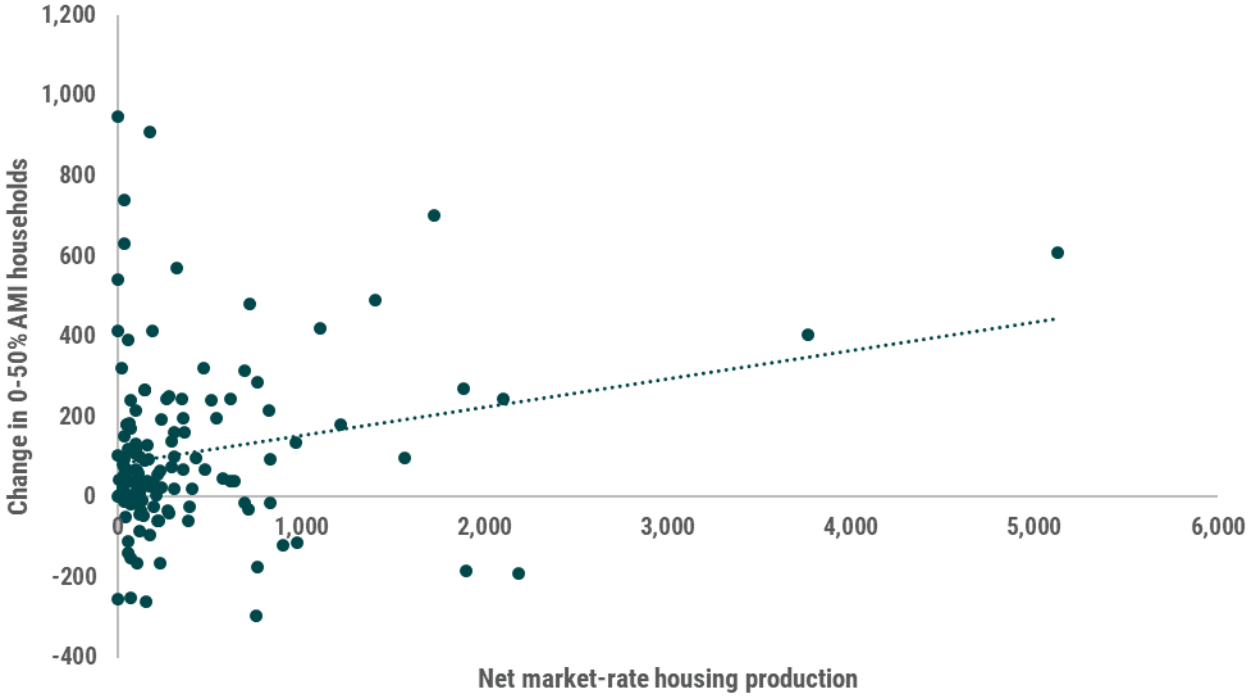
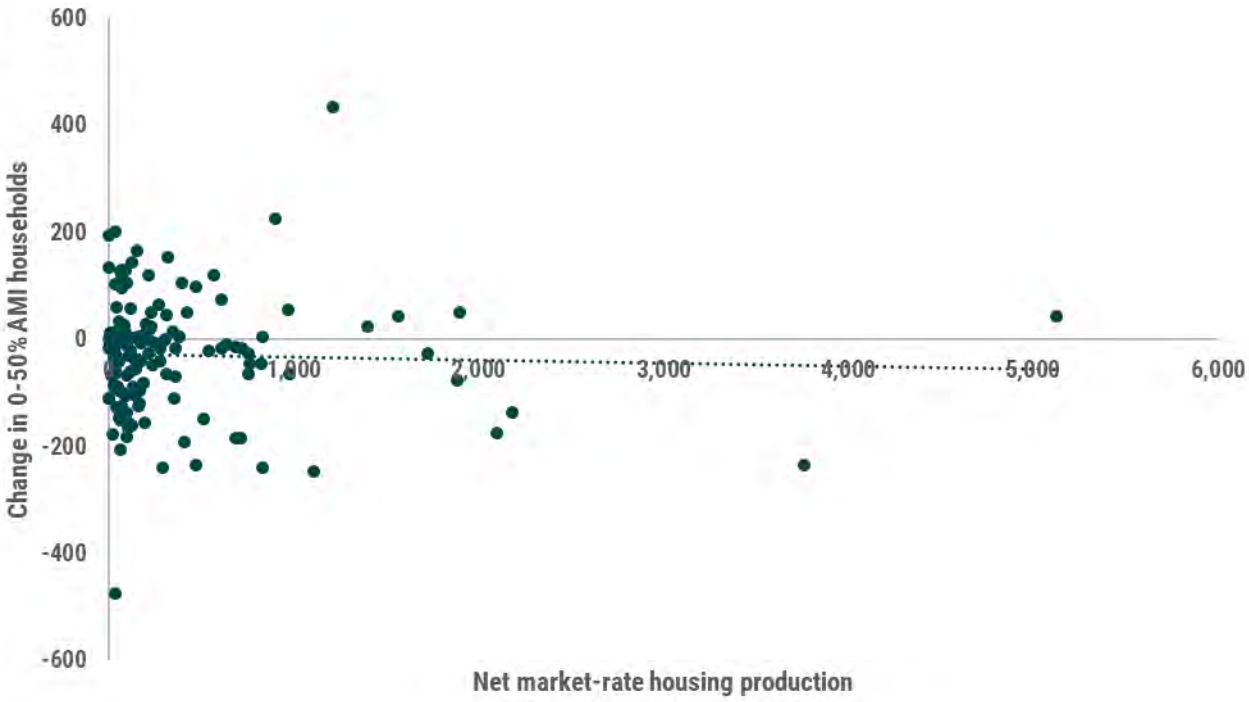


Exhibit 3.8-28. Correlation between Market-Rate Housing Production and Changes in Households with Incomes of 50-80% of AMI, 2010-2017



For middle- and higher-income households, market-rate housing production unsurprisingly has a strong positive correlation. This underscores that much of Seattle's new housing stock is relatively more affordable to and most directly serves relatively higher-income households. Overall, this historical analysis affirms previous findings that net market-rate housing production has not been associated with a loss of low-income households at a census tract level.

Cultural Displacement

Cultural displacement is even more challenging to quantify than physical and economic displacement. Because cultural displacement is caused by a confluence of factors and is driven by decisions about belonging and community, it is not practical to quantify the extent to which it is occurring. However, conversations with current and former residents of Seattle reveal that it is occurring. The City does track changes in population by race and ethnicity. While this information does not track the movement of individual households or why they might be moving, it can identify overall population shifts. The most current data available shows that, while the overall number of people of color in Seattle increased between 2010 and 2020 in absolute terms and as a percentage of Seattle's total population, the increase has been slower than in the rest of King County, and some racial and ethnic groups grew more slowly than others or lost population (see **Exhibit 3.8-29**). The Black population grew less than seven percent in Seattle but more than 40% in the remainder of King County. Populations that decreased or grew more slowly could reflect the impacts of physical displacement, economic displacement, and/or other factors. The physical or economic displacement of members of a community can also precipitate the cultural displacement of other members of the same community.

Exhibit 3.8-29. Change in Racial and Ethnic Composition of Seattle and Remainder of King County, 2010-2020.

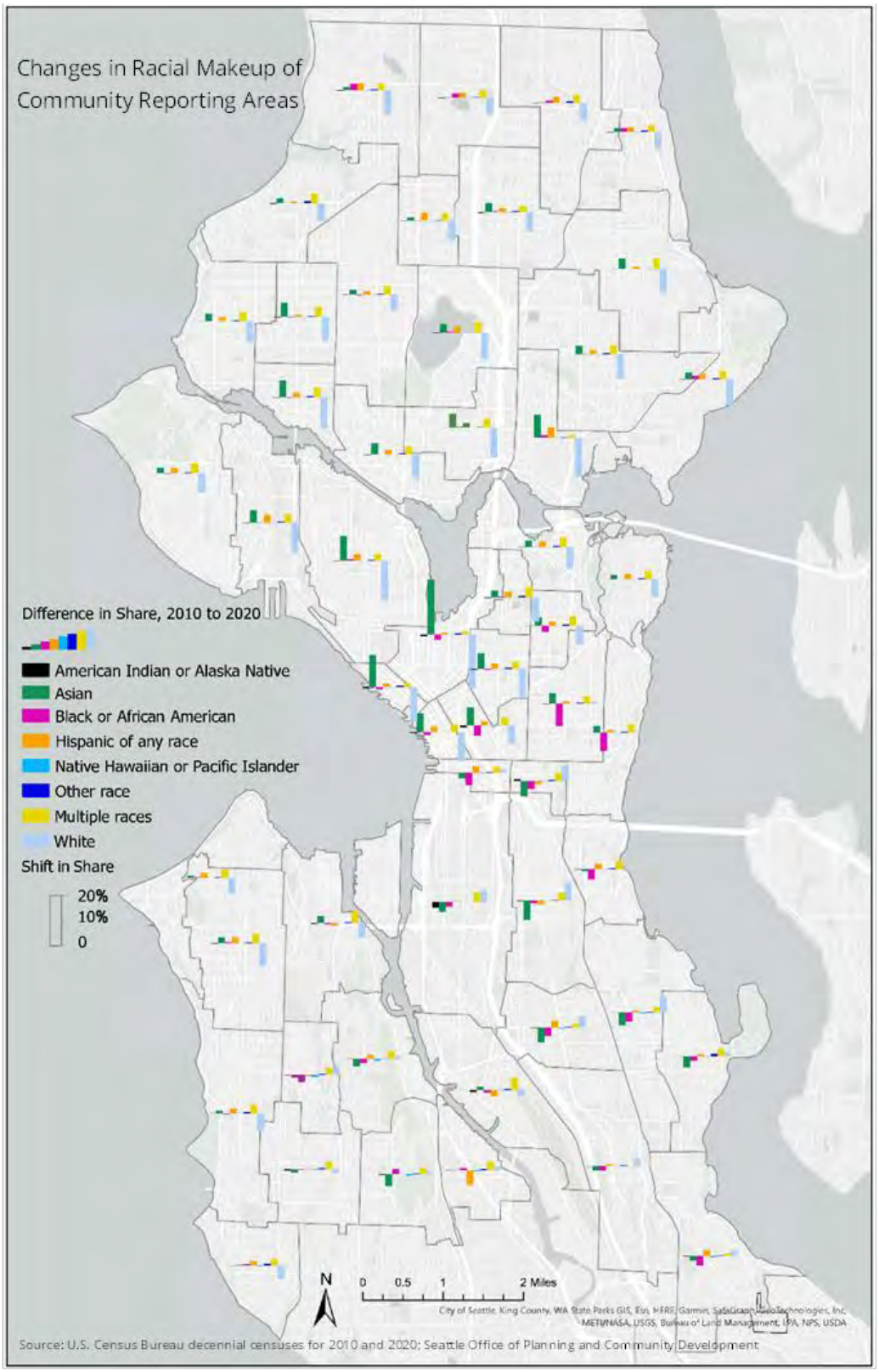
	Seattle		Remainder of King County	
	2010 to 2020 Growth	2020 Population	2010 to 2020 Growth	2020 Population
Total population	21.1%	737,015	15.9%	1,532,660
People of Color	45.7%	298,847	55.9%	740,240
Black	6.6%	50,234	41.0%	97,597
Native American	-15.8%	3,268	49.3%	8,542
Asian	49.3%	124,696	65.4%	325,033
Pacific Islander	-13.6%	1,941	47.7%	17,458
Another race	205.5%	4,473	181%	9,065
Two or more races	102.4%	53,672	88.8%	100,087
Hispanic/Latino, of any race	50.2%	60,563	38.2%	182,458
White	8.6%	438,168	-6.5%	792,420

Sources: Decennial Census estimates, U.S. Census Bureau

Exhibit 3.8-30 shows neighborhood-level change in the racial and ethnic composition in Seattle between 2010 and 2020. Notable changes include a pronounced decline in the Black or African American population share in the Central Area, reduction in the Asian population share in Beacon Hill and marked increase in South Lake Union and Belltown, and a lower Hispanic/Latino population share in South Park.

The neighborhoods in **Exhibit 3.8-30** are Community Reporting Areas (CRAs), groupings of census tracts the City uses to track population trends over time. Identifying demographic change at this scale is valuable given the historical and ongoing importance of certain neighborhoods to the development and preservation of some of Seattle's non-white cultural communities. Many of these communities originated during various phases of population growth, starting in the 19th century, as people migrated and immigrated to Seattle and established businesses and cultural organizations that drew others to those areas. During the 20th century, racially restrictive real estate covenants and redlining combined to further consolidate these communities. While this reduced access to housing and contributed to gaps in generational wealth along lines of race, it also spurred the creation of neighborhoods, networks, and institutions that specifically met the needs of some of Seattle's communities of color. Examples of culturally significant neighborhoods in Seattle include, among others, the Central District as a hub of Seattle's Black community; Chinatown–International District as a cultural hub for several Asian and Asian-American communities; much of Rainier Valley, which has concentrations of businesses and institutions owned by and serving immigrant and refugee communities; and South Park, which has become Seattle's largest Hispanic/Latinx community in recent decades. Some communities arise around communities with other shared identity, including the LGBTQ+ community in Capitol Hill, where change over time may be harder to measure with quantitative data sources. Finally, Native and Coast Salish people may view the natural environment overall, as well as specific locations and the Seattle region broadly, as places of cultural and historical importance.

Exhibit 3.8-30. Change in Racial and Ethnic Composition, 2010-2020

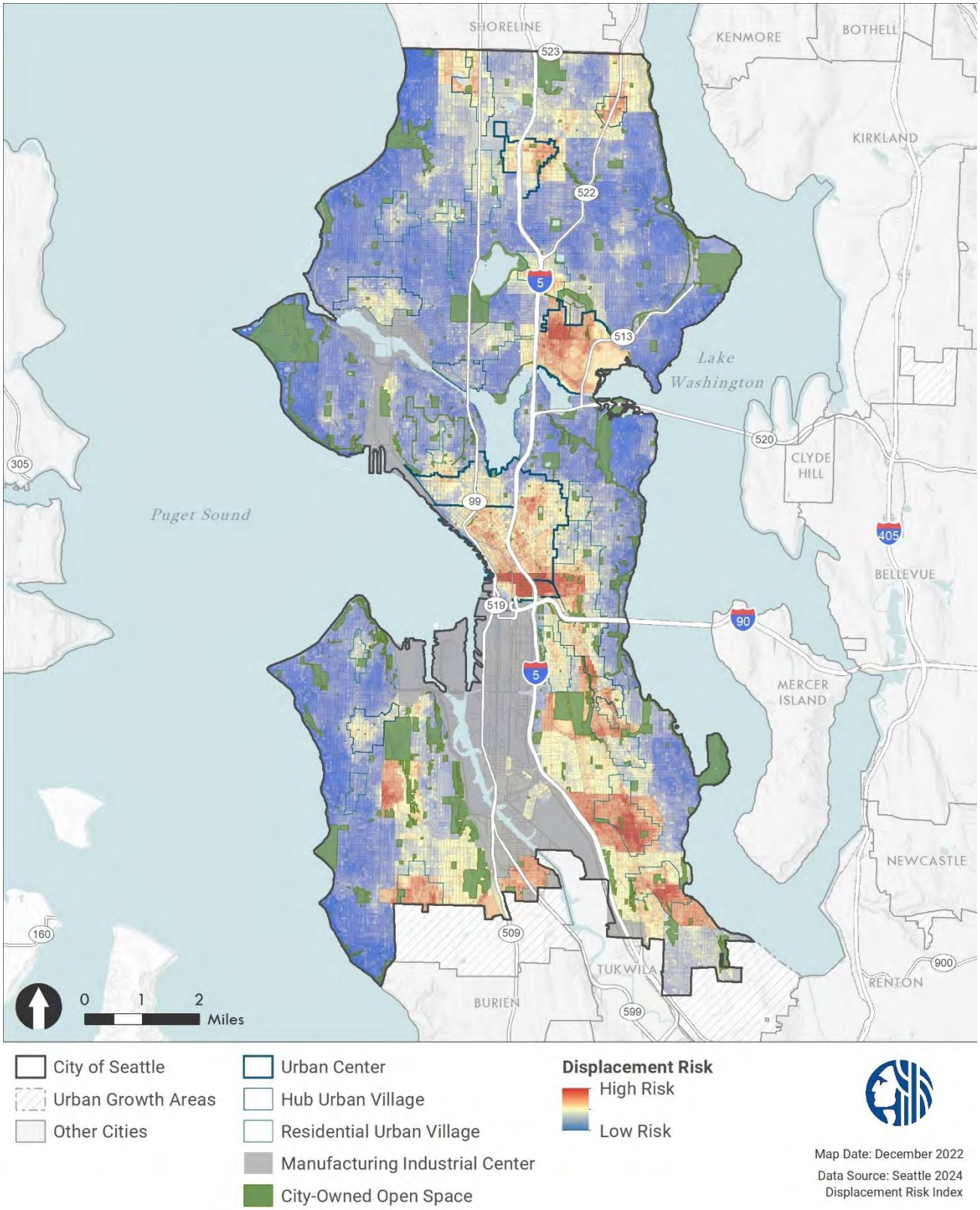


Source: City of Seattle, 2023.

Displacement Risk Index

Not all households are equally vulnerable to displacement pressure, and the factors that contribute to displacement risk are not equitably distributed throughout the city. Therefore, the City in 2016 developed in 2022 updated a Displacement Risk Index (shown in **Exhibit 3.8-31**) to identify where displacement of people of color, low-income people, renters, and other vulnerable populations may be more likely. The Displacement Risk Index provides a longer-term view of displacement risk based on neighborhood characteristics like the presence of vulnerable populations, rent and market factors, and infrastructure and amenities that tend to increase real estate demand. Neighborhoods with the highest displacement risk in Seattle include the Chinatown–International District, Central District, Rainier Valley, Rainier Beach, South Park, High Point, and the University District.

Exhibit 3.8-31. Seattle Displacement Risk Index, 2022

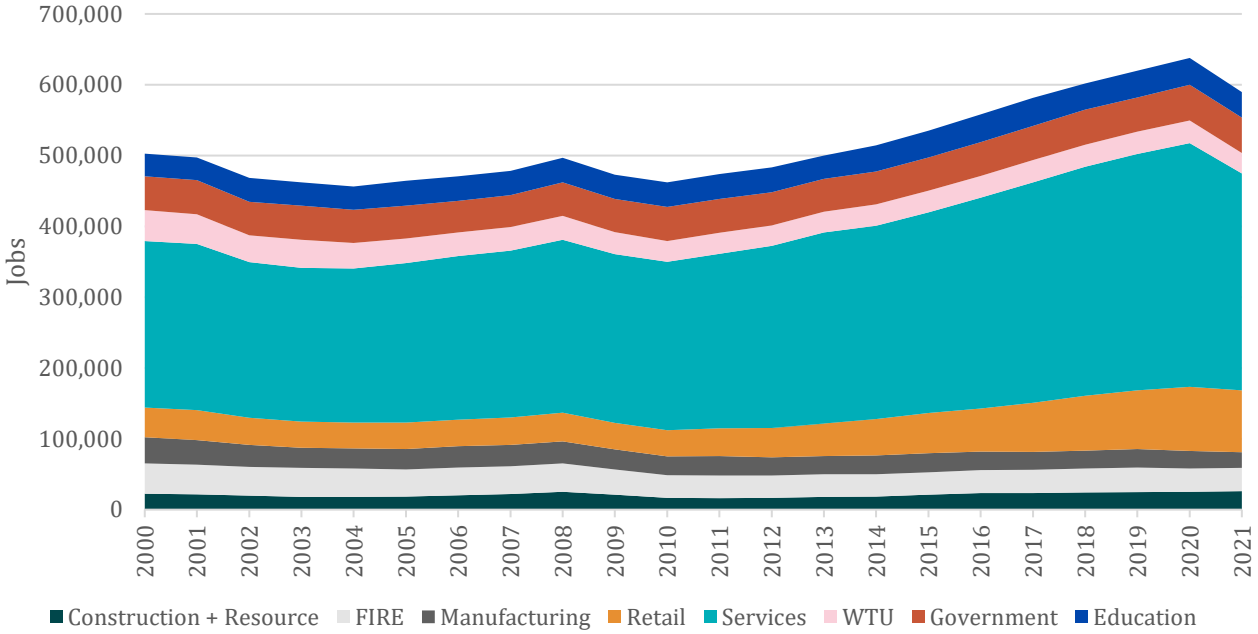


Sources: City of Seattle, 2022; BERK, 2023.

Employment

Between 2010 and 2020 Seattle experienced a rapid period of job growth, as shown in **Exhibit 3.8-32**. Much of that net growth was among services and retail sector jobs. As of March 2021, Seattle had 589,793 jobs, following a steep decline from the pre-pandemic peak in March 2020.

Exhibit 3.8-32. Seattle Employment by Sector, 2000-2021

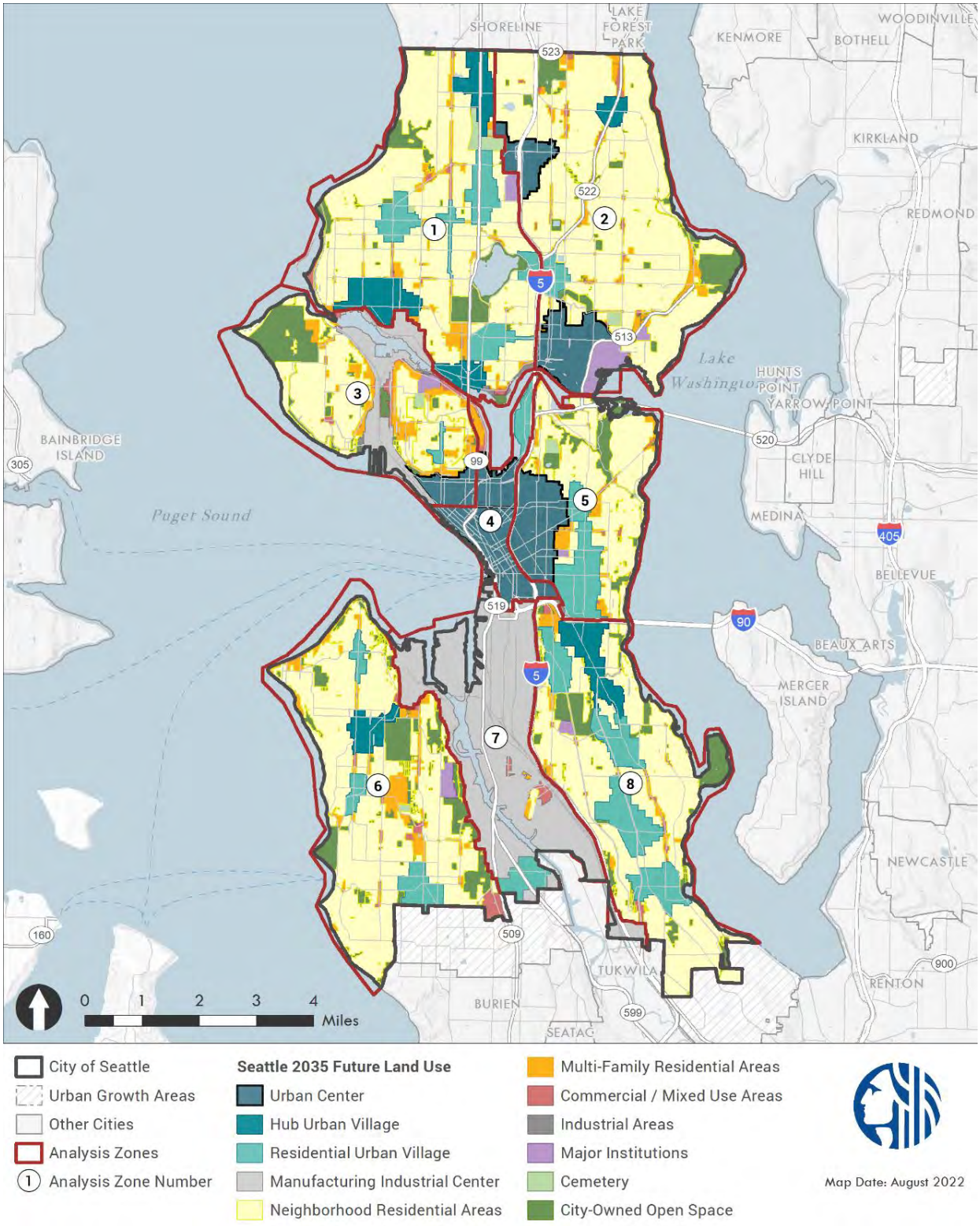


Sources: PSRC Covered Employment Estimates, 2022; BERK, 2023.

Analysis Areas

This section describes the unique population, employment, and housing characteristics of each analysis area. A map of the analysis areas is shown in **Exhibit 3.8-33**. This is followed by demographic and housing related statistics for each area in **Exhibit 3.8-34**, **Exhibit 3.8-35, Exhibit 3.8-36**, **Exhibit 3.8-37**, and **Exhibit 3.8-38.** The descriptions of each analysis area that follow refer to statistics in these exhibits as well as the displacement risk map in **Exhibit 3.8-31**.

Exhibit 3.8-33. EIS Analysis Areas



Note: 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 the other a~~A~~lternatives ~~2–5~~.
Sources: City of Seattle, 2022; BERK, 2022.

Exhibit 3.8-34. Demographics and Selected Household Characteristics by EIS Analysis Area

	Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Area 7	Area 8	Citywide
Total population	153,131	146,658	69,681	63,803	106,416	95,061	9,726	92,539	737,015
% People of color	28.8%	40.5%	31.4%	50.8%	38.4%	34.3%	52.4%	67.6%	40.5%
American Indian or Alaska Native, Non-Hispanic	0.4%	0.4%	0.4%	0.6%	0.4%	0.5%	1.2%	0.4%	0.4%
Asian, Non-Hispanic	10.1%	18.9%	13.0%	29.9%	13.7%	9.3%	14.3%	30.9%	16.9%
Black or African American, Non-Hispanic	2.9%	4.8%	2.6%	6.4%	7.8%	6.6%	8.5%	19.0%	6.8%
Hispanic of Any Race	7.0%	7.9%	7.5%	7.4%	8.2%	9.2%	19.6%	9.5%	8.2%
Native Hawaiian or Pacific Islander, Non-Hispanic	0.2%	0.2%	0.2%	0.2%	0.2%	0.4%	0.7%	0.4%	0.3%
Other, Non-Hispanic	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%	0.6%
Two or More Races, Non-Hispanic	7.7%	7.6%	7.1%	5.7%	7.4%	7.7%	7.5%	6.8%	7.3%
White, Non-Hispanic	71.2%	59.5%	68.6%	49.2%	61.6%	65.7%	47.6%	32.4%	59.5%
Total population under 18 years	15.5%	15.4%	14.4%	4.9%	9.7%	18.3%	14.2%	19.8%	14.5%
Total households	74,815	54,901	34,227	36,389	55,466	42,679	2,076	36,808	337,361
% owner households	48%	50%	45%	19%	34%	60%	45%	58%	45%
% renter households	52%	50%	55%	81%	66%	40%	55%	42%	55%
Average household size	2.10	2.36	1.88	1.52	1.81	2.25	2.38	2.61	2.08

Source: City of Seattle analysis of U.S. Census 2020; American Community Survey 5-Year Estimates (2017-2021): S1101 Households and Families; and American Community Survey 5-Year Estimates (2017-2021): B25012 Tenure by Families and Presence of Own Children.

Exhibit 3.8-35. Demographics of Neighborhood Residential (NR) Zones by EIS Analysis Area

	Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Area 7	Area 8	Citywide
Population in NR zones	76,063	75,728	27,918	1,110	26,729	54,283	1,196	49,769	312,796
% Total population in NR zones	50%	52%	40%	2%	25%	57%	12%	54%	42%
People of color as % of NR population	24%	31%	24%	27%	28%	30%	47%	63%	33%
People of color as % of population *outside* NR zones	33%	51%	37%	51%	42%	40%	53%	73%	46%

Notes: Neighborhood Residential zones are determined by the City of Seattle and zoned primarily for detached homes.
Source: City of Seattle analysis of U.S. Census 2020; American Community Survey 5-Year Estimates (2017-2021): S1101 Households and Families; and American Community Survey 5-Year Estimates (2017-2021); BERK, 2023.

Exhibit 3.8-36. Average Rent and Rental Affordability by EIS Analysis Area

	Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Area 7	Area 8	Citywide
Average rent, 1-bedroom apartment	$1,912	$1,635	$1,854	$2,301	$1,911	$1,737	$715	$1,791	$1,940
Affordability of 1-bedroom apartment (% AMI)	76.0%	65.0%	73.0%	91.0%	76.0%	69.0%	28.0%	71.0%	77.0%

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

Exhibit 3.8-37. Housing Units by Type by EIS Analysis Area

	Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Area 7	Area 8	Citywide
Total housing units	79,576	64,581	36,514	52,062	70,170	46,500	2,287	39,704	391,394
Total detached homes	32,371	29,712	11,207	451	12,445	24,905	1,212	22,183	134,486
% detached homes	41%	46%	31%	1%	18%	54%	53%	56%	34%
Total multifamily homes	47,205	34,869	25,307	51,611	57,725	21,595	1,075	17,521	256,908
% multifamily homes	59%	54%	69%	99%	82%	46%	47%	44%	66%

Sources: King County Department of Assessments, compiled by City of Seattle, July 2022.

Exhibit 3.8-38. Displaced TRAO-Eligible Households by EIS Analysis Area

	Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Area 7	Area 8	Citywide
Total renter households	38,577	27,317	18,795	29,450	36,785	17,197	1,139	15,606	184,866
Total TRAO* displacements, 2015-22	203	325	106	70	255	86	31	124	1,200
TRAO displacement rate (annual per 10,000 renter households)	8	17	8	3	10	7	39	11	9

Sources: Seattle Department of Construction & Inspections, 2023; BERK, 2023.

Area 1: Northwest Seattle

Area 1 is in northwest Seattle, including the urban villages of Ballard, Fremont, Wallingford, Greenwood, Bitter Lake, and Aurora–Licton Springs. This area is relatively affluent and less diverse than other parts of Seattle, except the north end of the area, around Bitter Lake and Aurora–Licton Springs, which have higher displacement risk.

Population: Area 1 has a population of 153,131, with half (50%) living in Neighborhood Residential zones. Nearly three-quarters of the population of Area 1 (71%) identifies as White, Non-Hispanic, substantially higher than this proportion citywide (59%). The percentage of Area 1 residents identifying as BIPOC is 29%, much lower than the citywide 41%. This area has a smaller share of residents who identify as Black or Asian, compared to citywide. Fifteen percent of the population of this area is under 18 years old, just above the city average of 14%.

Housing: Area 1 has 79,576 housing units, of which 41% are detached homes and 59% are multifamily. Slightly less than half (48%) of households in Area 1 own their homes, and the average household size is 2.1 people, comparable to the citywide average.

Rental housing costs in Area 1 are the highest in the city outside downtown. The average rent for a 1-bedroom apartment in Area 1 is $1,914, which is affordable for a household whose income is 76% of AMI (see **Exhibit 3.8-20**). Ownership housing costs are slightly higher than the citywide average. A 3-person household needs an income 224% of AMI to afford a median priced detached home, compared to 216% citywide.

Mixed-use and multifamily housing production between 2009 and 2022 was most robust in low displacement risk areas (such as Fremont, Ballard, and Greenwood) and at the junction of Holman Road and Greenwood Avenue. Less new development has occurred in areas with higher displacement risk.

Based on Seattle's TRAO data, at least 203 low-income renter households in Area 1 were displaced between 2015 and 2022, an average annual rate of approximately 8 per 10,000 renter households, close to the average citywide.

Employment: Area 1 is primarily residential but has several urban villages and small sections of industrial activity at its southern border along the Ship Canal. Most jobs are located in and adjacent to that industrial concentration (which continues south across the canal into Area 3), along retail corridors (15th Ave NW, Aurora Ave NW, Greenwood Ave NW, and Holman Road NW), or in services like schools. North Seattle College sits on the eastern border of Area 1, next to the Northgate Urban Center in Area 2.

Area 2: Northeast Seattle

Area 2 comprises northeast Seattle, including the University of Washington (UW) main campus, Seattle Children's Hospital, the University District and Northgate Urban Centers, the Lake City and Roosevelt Urban Villages. The UW area to the south and Northgate and Lake City areas to the north both have moderate to high rates of displacement risk, while the middle section of Area 2, which includes neighborhoods like Maple Leaf, View Ridge, and Laurelhurst, is affluent, more residential, and scores lower on vulnerability to displacement.

Population: One in five Seattle residents live in Area 2. More than half (52%) of its population of 146,658 resides in Neighborhood Residential zones. Approximately 60% of the population of Area 2 identifies as White, Non-Hispanic, and 40% identify as BIPOC, similar to citywide. The population distribution by race is also similar to citywide demographics. Fifteen percent of the population of this area is under 18 years old, just above the city average of 14%.

Housing: Area 2 has 64,581 housing units, of which 46% are detached homes and 54% are multifamily. Area 2 has a homeownership rate of about 50% and an average household size of 2.36 people.

Rental housing costs in Area 2 are somewhat lower than the Seattle average. The average rent for a 1-bedroom apartment in Area 1 is $1,635, which is affordable for a household whose income is 65% of AMI. Ownership housing costs are slightly higher compared to the citywide average. A 3-person household needs an income 224% of AMI to afford a median priced detached home, compared to 216% citywide.

Based on Seattle's TRAO data, at least 325 low-income renter households in Area 2 were displaced between 2015 and 2022, an average annual rate of approximately 17 per 10,000 renter households, nearly double the citywide average of 9.

Employment: Employment centers in Area 2 include the UW main campus and University District, Seattle Children's Hospital, and the urban center surrounding Northgate Mall, as well as the commercial center in the Lake City Urban Village. Most other land in Area 2, however, is large residential areas predominated by detached housing and few services.

130th/145th Station Area

These anticipated stations are a locus of current and anticipated development in Area 2. Currently primarily residential, this sub-area will increasingly serve as a connector between Lake City to the east and Bitter Lake and Aurora–Licton Springs to the west when the light rail stations open in 2024-2025. The residential areas within the half-mile buffer around NE 130th St Station are assessed to have low to moderate displacement risk according to Seattle's Displacement Risk Index (see **Exhibit 3.8-31**). Pockets of the broader Station Area have higher displacement risk: within the Lake City Urban Village, along 15th Ave NE south of NE 130th St, and on the west side of Aurora (SR 99) north of NE 130th St.

Area 3: Queen Anne/Magnolia

Area 3 covers western (but not West) Seattle south of the ship canal but north of downtown. This area includes Magnolia to the west and Queen Anne to the east, split by the Interbay industrial and manufacturing area. The Queen Anne section includes the Upper Queen Anne Urban Village and Uptown (Lower Queen Anne) Urban Center.

Population: Area 3 has a population of 69,681 (approximately 1 in 10 Seattle residents), with slightly less than half (40%) living in Neighborhood Residential zones. Approximately 69% of the population of Area 3 identifies as White, Non-Hispanic, and 31% identify as BIPOC, making it less diverse than the city as a whole. This area has a relatively smaller share of residents who identify as Black or Asian, compared to citywide. The population of this area under 18 years old is similar to the citywide rate at 14%.

Housing: Areas 3 has 36,514 housing units, of which 31% are detached homes and 69% are multifamily. Area 3 has a homeownership rate of about 45% and average household size of 1.88 people, lower than the citywide average of 2.08.

Rental housing costs in Area 3 are slightly lower than the Seattle average. Citywide the average rent for a 1-bedroom apartment is $1,940, versus $1,854 in Area 3, which is affordable for a household whose income is 73% of AMI. Ownership housing costs are substantially higher compared to the citywide average. A 3-person household needs an income 316% of AMI to afford a median priced detached home, compared to 216% citywide.

Based on TRAO data, at least 106 low-income renter households in Area 3 were displaced between 2015 and 2022, an average annual rate of approximately 8 per 10,000 renter households.

Employment: Employment centers in Area 3 include the Ballard–Interbay–North End Manufacturing and Industrial Center; the Uptown Urban Center northwest of Seattle Center; and Seattle Pacific University along the south edge of the ship canal. However, west of Interbay, which bisects Area 3, most of Magnolia is residential and lacks substantial services.

Area 4: Downtown/Lake Union

Area 4 comprises central and downtown Seattle, including the Westlake neighborhood and the Eastlake Urban Village that flank Lake Union and the South Lake Union and Downtown Urban Centers. It also includes the Chinatown International District.

Population: Area 4 has a population of 63,803 (about 9% of the city total), residing primarily in multifamily apartment buildings in the densest part of Seattle. Just 2% live in Neighborhood Residential zones due to the small amount of that zone in Area 4. Compared with other areas, Area 4 has relatively fewer people who identify as White, Non-Hispanic(approximately half of the population of Area 4). Thirty percent identify as Asian alone, nearly double the Seattle average. Many of these Asian residents live in the Chinatown-International District. Approximately half of Area 4 residents identify is BIPOC, significantly higher than the citywide (41%). Few families live in Area 4: only 5% of the population of this area is under 18 years old, around a third of the percentage for Seattle overall (14%).

Housing: Area 4 has 52,062 housing units, of which just one percent are detached homes and 99% are multifamily. Nearly 10% of those apartments are vacant, the highest vacancy rate of any EIS Area. Area 4 also has the highest percentage of renters (4 out of 5 households rent), and the smallest average household size (1.5 people) in the city.

Rental housing costs in Area 4 are the highest in Seattle. The average rent for a 1-bedroom apartment in Area 4 is $2,301, which is affordable only to households with incomes of at least 91% of AMI. Nearly all ownership housing supply is in condominiums in larger multifamily buildings, and the housing cost for this kind of unit is higher than any other area of the city.

Based on TRAO data, at least 70 low-income households in Area 4 were displaced between 2015 and 2022, for an average annual rate of approximately 3 per 10,000 households, markedly lower than elsewhere in the city.

Employment: Area 4 has a high concentration of commercial activity. In addition to corporate and professional offices throughout downtown, Area 4 houses the Seattle's civic campus (City of

Seattle, King County, and other government facilities and offices); Amazon's headquarters in South Lake Union; dining, nightlife, and cultural institutions; hotels and tourist facilities; and downtown and waterfront retail, including the Pike Place Market. While this area has higher job volume and capacity than elsewhere in Seattle, it has been hit especially hard by the COVID-19 pandemic.

Area 5: Capitol Hill/Central District

Area 5 is central and eastern Seattle, including the First Hill/Capitol Hill Urban Center and the Madison–Miller and 23rd & Union–Jackson Urban Villages. This area is more densely populated than most and includes the historic centers of Seattle's Black (Central District) and LGBTQ+ (Capitol Hill) communities.

Population: Area 5 has a population of 106,416 (approximately 14% of Seattle residents), with about 1 in 4 living in Neighborhood Residential zones. About 62% of the population of Area 5 identifies as White, Non-Hispanic and 38% identify as BIPOC, making Area 5 slightly less diverse than citywide. About 8% of residents identify as Black, Non-Hispanic, just slightly higher than the percentage citywide (7%). Only 10% of Area 5 residents are under 18 years old, compared to 10% citywide.

Housing: Area 5 has 70,170 housing units, of which 18% are detached homes and 82% are multifamily, the highest share of multifamily housing outside downtown. Correspondingly, Area 5 has a lower homeownership rate (about 1 in 3 households) than other EIS Areas. The average household has 1.8 people.

Rental housing costs in Area 5 are roughly equal to the Seattle average. The average rent for a 1-bedroom apartment in Area 5 is $1,911, which is affordable for a household whose income is 76% of AMI. Ownership housing costs are substantially higher compared to the citywide average. A 3-person household needs an income 311% of AMI to afford a median priced detached home, compared to 216% citywide.

Based on TRAO data, at least 255 low-income renter households in Area 5 were displaced between 2015 and 2022, an average annual rate of approximately 10 per 10,000 renter households.

Employment: Area 5 is home to much of the city's healthcare institutions (including Swedish, Virginia Mason, and Harborview hospitals) on First Hill, part of an urban center that extends north through Capitol Hill. The 23rd & Union–Jackson Urban Village, which spans much of the historically Black Central District of Seattle, has a few locations with neighborhood serving commercial uses. Neighborhood-serving businesses also exist in parts of Capitol Hill and Madison Valley. Other neighborhoods in Area 5 are predominantly high-cost residential areas with limited services, like Montlake, Leschi, Broadmoor, Madrona, and Portage Bay.

Area 6: West Seattle

Area 6 comprises southwest Seattle, including West Seattle's Admiral, West Seattle Junction, and Morgan Junction Urban Villages and the Westwood–Highland Park Urban Village.

Population: Area 6 has a population of 95,061, of which 57% lives in Neighborhood Residential zones, more than any other EIS Area. More than two-thirds of the population identifies as White, Non-Hispanic, and 38% identify as BIPOC, compared to 41% BIPOC citywide. About 18% of Area 6 residents are under 18 years old, compared to 14% citywide.

Housing: Area 6 has 46,500 housing units, of which 54% are detached homes and 46% are multifamily. At roughly 60%, Area 6 has the highest homeownership rate of any EIS Area. The average household size is 2.25 people, slightly above the citywide average.

Rental housing costs in Area 6 are slightly below the city average. The average rent for a 1-bedroom apartment in Area 6 is $1,737, which is affordable for households whose income is a 69% of AMI. Ownership housing costs are somewhat lower compared to the citywide average. A three-person household needs an income of 181% of AMI to afford a median priced detached home, compared to 216% citywide.

Based on TRAO data, at least 86 low-income renter households in Area 6 were displaced between 2015 and 2022, an average annual rate of approximately 7 per 10,000 renter households.

Employment: Area 6 has limited commercial development overall. The southern portion has access to services at Westwood Village, near Highland Park, and in White Center in unincorporated King County. Many residential areas in West Seattle down to Fauntleroy and Arroyo Heights have limited services. Area 6 is also home to South Seattle Community College.

Area 7: Duwamish

Located in south Seattle between Area 6 to the west and Area 8 to the east, Area 7 comprises primarily industrial-zoned land along the Duwamish river, including Port of Seattle land, the Seattle Intermodal facility (railyard), Boeing Field, the Georgetown neighborhood, and the South Park Urban Village. This area is sparsely populated, with far less residential land than other EIS areas apart from Georgetown and South Park. Given its smaller residential population, statistics about this area are suggestive and less reliable, as small changes in the limited sample could have large effects.

Population: Area 7 has a population of 9,726 (just 1.3% of the City's population), of which about 12% reside in Neighborhood Residential zones. Less than half of the population of Area 7 identifies as White, Non-Hispanic and 52% identify as BIPOC, compared to 41% citywide. Nearly 20% of residents in Area 7 identify as Hispanic or Latino, over double the rate citywide (8%). About 14% of Area 7 residents are under 18 years old, equivalent to the citywide share.

Housing: Area 7 has only 2,287 housing units, of which just over half (53%) are detached homes primarily in South Park. The homeownership rate is 45%, and the average household size is 2.38 people, larger than the Seattle average of 2.08.

Rental housing costs in Area 7 are the lowest in the city. The average rent for a 1-bedroom apartment in Area 7 is $715, which is affordable for household whose income is 28% of AMI, though this data reflects a limited sample, with no newly developed units and only one building

that was substantially rehabilitated between 2013 and 2022. Ownership housing costs are substantially lower compared to the citywide average. A three-person household needs an income of 130% of AMI to afford a median priced detached home, compared to 216% citywide.

Based on TRAO data, at least 31 low-income renter households in Area 7 were displaced between 2015 and 2022, an average annual rate of approximately 39 per 10,000 renter households, more than four times the citywide average.

Employment: Area 7 is primarily industrial, with small commercial clusters in the Georgetown and South Park neighborhoods. Boeing Field / King County International Airport is located in Area 7.

Area 8: Southeast Seattle

Area 8 covers southeast Seattle, including the North Beacon Hill, Mt. Baker, Columbia City, Othello, and Rainier Beach Urban Villages. This area includes some of the most racially diverse neighborhoods in Seattle and is home to mixed-income planned housing developments like Holly Park.

Population: Area 8 has a population of 92,539, similar to Area 6, with 54% living in Neighborhood Residential zones. More than two-thirds of the population identifies as BIPOC. Asian (31%) and Black (19%) identifying residents are overrepresented compared to their shares citywide (17% and 7%, respectively). Almost 20% of Area 8 residents are under 18 years old, the highest rate of any EIS Area.

Housing: Area 8 has 39,704 housing units, of which 56% are detached homes and 44% are multifamily. The homeownership rate is 58%, second only to Area 6. The average household size is 2.61 people, the highest of any EIS Area by a substantial margin.

Rental housing costs in Area 8 are slightly lower than the city average and on par with Area 6 and Area 3 on a per-square-foot basis. The average rent for a 1-bedroom apartment is $1,791, which is affordable for a household whose income is 71% of AMI. Ownership housing costs are somewhat lower compared to the citywide average. A three-person household needs an income 172% of AMI to afford a median priced detached home, compared to 216% citywide.

Based on TRAO data, at least 124 low-income renter households in Area 8 were displaced between 2015 and 2022, an average annual rate of approximately 11 per 10,000 renter households.

Employment: Area 8 has mixed-use and commercial development primarily along the main arterials of Rainier Ave S, Beacon Ave S, and Martin Luther King Jr. Way S. However, large residential areas away from these corridors, including nearly the entire Rainier Beach neighborhood to the south, have limited or no services. Area 8 is also home to the Veterans' Affairs Puget Sound Health Care campus.

3.8.2 Impacts

Impacts Common to All Alternatives

Housing Capacity

As described in **Section 3.7**, changes to the GMA in 2021 added new requirements for jurisdictions to "plan for and accommodate housing affordable to all economic segments of the population of this state." To comply with these requirements, King County identified projected countywide housing needs by income level and allocated these needs down to individual jurisdiction. These allocated housing needs for Seattle are shown above in **Exhibit 3.7-4**.

Washington State Department of Commerce (Commerce) provides guidance for analyzing buildable land capacity for residential development to determine whether there is adequate capacity for housing types that have potential to address housing needs at each income level. The Draft Housing Technical Appendix for the One Seattle Plan details the methodology used to relate individual zones to potential income levels served, consistent with Commerce guidance. **Exhibit 3.8-39** shows the results of this analysis for the No Action Alternative. The zone-based matching approach showed a potential deficit in housing affordable at >80 to 120% of AMI, but a cumulative surplus when considering results of a market analysis[55] indicating that unsubsidized housing development in Zones with 50 to 85 ft. height limits can serve households with incomes >80 to 120% of AMI.

Exhibit 3.8-39. Existing Zoning Compared to Needs by Income Band

Income Level (% AMI) & Special Housing Needs	Projected Housing Need (2019-2044)*	Zone Categories Serving These Needs**	Aggregated Housing Needs	Total Capacity	Discrete Capacity Surplus/Deficit	Cumulative Capacity Surplus
0 - 30%, PSH***	15,024	Zones with 50 to 85 ft. height limits	70,726	94,641	+23,915	+23,915
0 - 30%, Non-PSH	28,572					
> 30 - 50%	19,144					
> 50 - 80%	7,986					
> 80 - 100%	5,422	Zones with < 50 ft. height limits	11,572	7,001	-4,571	+19,344
> 100% - 120%	6,150					
> 120%	29,702	Zones with > 85 ft. height limits, Neighborhood Residential, Residential Small Lot, Lowrise 1 and 2, ADUs	29,702	66,444	+36,742	+56,086
Total	**112,000**		**112,000**	**168,086**	**+56,086**	**+56,086**

Notes: This exhibit is new since the Draft EIS.
*Projected housing needs reflect the period of 2019 through 2044.
**Housing capacity in Industrial zones, primarily limited to caretaker units, not included in affordability analysis.

[55] See One Seattle Plan, Mayor's Proposed Plan, January 2025, Appendix 2 Housing: https://www.seattle.gov/documents/Departments/OPCD/SeattlePlan/OneSeattlePlanMayorsPlanAppendices2025.pdf.

***PSH = Permanent Supportive Housing.
Source: City of Seattle, 2024.

Data to perform this analysis is available for the Preferred Alternative and is presented in **Exhibit 3.8-40**.[56] It shows greater total housing capacity due to the proposed zoning changes. As with the No Action Alternative, there is a discrete capacity deficit in housing affordable at >80 to 120% of AMI, but a cumulative surplus when considering market analysis for unsubsidized housing development in zones with 50 to 85 foot height limits can serve households with incomes >80 to 120% of AMI.

Exhibit 3.8-40. Proposed Zoning Compared to Needs by Income Band

Income Level (% AMI) & Special Housing Needs	Projected Housing Need (2019-2044)*	Zone Categories Serving These Needs**	Aggregated Housing Needs	Total Capacity	Discrete Capacity Surplus/Deficit	Cumulative Capacity Surplus
0 - 30%, PSH***	15,024	Zones with 50 to 85 ft. height limits	70,726	188,004	+117,278	+117,278
0 - 30%, Non-PSH	28,572					
> 30 - 50%	19,144					
> 50 - 80%	7,986					
> 80 - 100%	5,422	Zones with < 50 ft. height limits	11,572	2,459	-9,113	+108,165
> 100% - 120%	6,150					
> 120%	29,702	Zones with > 85 ft. height limits, Neighborhood Residential, Residential Small Lot, Lowrise 1 and 2, ADUs	29,702	140,470	+110,768	+218,933
Total	**112,000**		**112,000**	**330,933**	**+218,933**	**+218,933**

Notes: This exhibit is new since the Draft EIS.
*Projected housing needs reflect the period of 2019 through 2044.
**Housing capacity in Industrial zones, primarily limited to caretaker units, not included in affordability analysis.
***PSH = Permanent Supportive Housing. Source: City of Seattle 2024
Source: City of Seattle, 2024.

In summary, both alternatives have sufficient capacity to meet all requirements under GMA. However, the Preferred Alternative provides additional capacity to support additional housing growth and accommodate a greater diversity of housing needs.

Housing Supply

Seattle's housing supply would continue to increase under all five alternatives. What distinguishes the alternatives is the total amount of housing growth each would accommodate, the distribution of housing growth in different place types across the city, and the types of new

[56] Data is not available to perform this analysis for Alternatives 2-5.

housing likely to unfold in each place type given their zoning. Different kinds of housing can best support different kinds of households due to the size and affordability of units. **Exhibit 3.8-41** summarizes the amount and type of housing likely to be developed under each alternative. These projections are based on the amount of housing growth expected in each place type (detailed in **Chapter 2**) and assumptions about the kinds of housing most likely to be developed in each place type. These assumptions are based on recent housing production trends in zones similar to each proposed place type.

All action alternatives are expected to increase total housing supply more than No Action. The Preferred Alternative would increase total supply by 120,000 units. It would also result in the greatest amount of non-stacked housing (such as townhomes) compared to other alternatives. In Alternative 2 (Focused) and 5 (Combined), a greater share of new housing would be in stacked housing such as apartment buildings. ~~Alternative 3 (Broad) would produce the greatest diversity of housing types, particularly detached and attached homes.~~

Washington State law now requires that Seattle allow unit lot subdivision in Neighborhood Residential zones. This change would impact all action alternatives and is expected to result in more homes intended for sale on separate lots (as is common for townhomes) rather than as condominiums. While unit lot subdivision is not likely to change the size or shape of new buildings, it might make redevelopment more feasible since creating a condo association requires more work for developers and condominiums may be less desirable for some prospective buyers.

Exhibit 3.8-41. Projected Net New Housing Units by Housing Type

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred
Stacked Housing						
Condominiums	2,261	2,977	3,730	3,127	3,626	3,322
Apartments	73,109	93,815	76,652	88,662	110,079	91,106
Attached and Detached Housing						
>2,000 sq. ft.	1,389	698	1,111	1,111	1,111	4,132
>1,200 – 2,000 sq. ft.	648	533	4,260	1,578	1,128	14,766
≤1,200 sq. ft.	2,593	1,977	14,247	5,522	4,056	6,675
Total Net New Housing	**80,000**	**100,000**	**100,000**	**100,000**	**120,000**	**120,000**

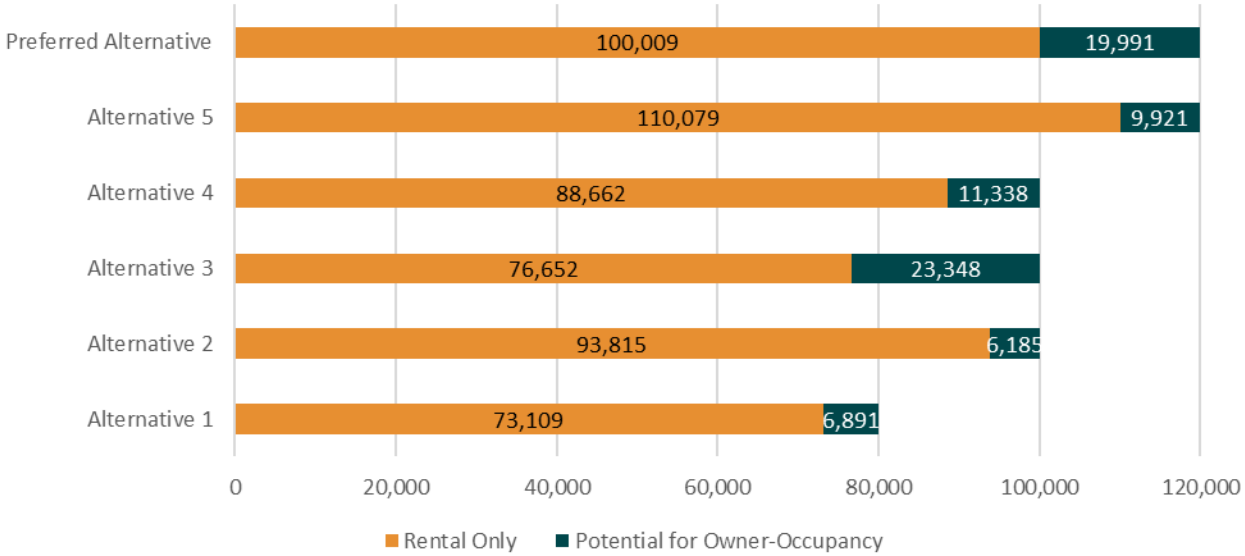
Note: Attached and detached housing refers primarily to unit types expected to be built in urban neighborhood areas. These include detached homes, attached, or detached accessory dwelling units, townhomes, or other low- to moderate-density formats that may be created through unit lot subdivision. All of these units could be sold separately or as condominiums to support homeownership opportunities. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024; BERK, 2024.

All five alternatives are expected to add substantially more renter-occupied housing than owner-occupied housing to the city's housing supply. This is consistent with recent housing production trends where most housing growth is in new apartment buildings. However, the

alternatives vary substantially in the amount and potential tenure of projected new housing, as shown in **Exhibit 3.8-42**. These projections are based on the types of new housing expected to be produced in each alternative. They assume all attached and detached housing can be sold separately as either a condominium or on its own lot. For stacked housing, they assume that 60% would be built as condos in urban neighborhood areas, and 3% would be built as condos in all other place types.[57] However, any individual condominium or house on its own lot could be either owner- or renter-occupied.

Despite its higher overall housing growth estimate, Alternative 2 would produce fewer units that could be owner-occupied compared to Alternative 1 (No Action) due to its emphasis on zones that allow multifamily housing, which tend to be rental. The Preferred Alternative and Alternative 3 would produce the most units that could be owner-occupied due to ~~its~~ their emphasis on growth in small-scale detached and attached housing typically offered for sale. Over time, changes in consumer preference, housing costs, or laws governing condominium construction could result in changes in the percentage of units that are owner-occupied.

Exhibit 3.8-42. Projected Net New Housing Units by Tenure



Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Affordability of New Market Housing Supply

As discussed earlier, the balance of housing supply with the demand for housing in Seattle is a major contributing factor to market housing costs. Rising demand for new housing creates competition for a limited supply of homes. This causes upward pressure on rents and sales prices. In all alternatives, demand for housing in Seattle is likely to remain very high. However,

[57] Analysis by City of Seattle indicates that about 3% of all multifamily housing constructed in recent years were condominiums. However, trends indicate a much higher percentage of new attached and detached homes in Neighborhood Residential zones are being sold separately as condos. Therefore, in alternatives where stacked housing types are allowed in Neighborhood Residential zones, a higher percentage of those new units are expected to be available as condominiums.

the alternatives vary in the total amount of net new housing that would result. In general, the action alternatives would be expected to reduce competition for housing compared to No Action due to the increased housing growth that they accommodate. Alternative 5 and the Preferred Alternative 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.

New housing tends to be more expensive than older housing, as shown in **Exhibit 3.8-20** and **Exhibit 3.8-22**. However, this trend is due in part to the fact that new housing built in Neighborhood Residential zones has tended to be much larger than existing homes. As shown in **Exhibit 3.8-20**, **Exhibit 3.8-21**, and **Exhibit 3.8-23**, the affordability of new housing varies substantially by housing type and size. As of 2022, purchasing a median-priced detached home built between 2013 and 2022 requires nearly 300% of AMI, and even a median-priced detached home built before 1994 is affordable only to households with an income of at least 182% of AMI. By contrast, new apartments (built 2013-2022) were typically affordable to households with incomes of 80-100% of AMI. Among for-sale housing, new townhouses are typically affordable to households with incomes of 166% of AMI, smaller non-stacked condos less than 1,200 sq ft are affordable at 138% of AMI, and stacked condos are affordable at 117% of AMI. These affordability levels could change in the future, depending on the amount and type of housing created in Seattle, as well as other factors. Additionally, changes to density limits in Neighborhood Residential zones could result in smaller units that are comparatively lower cost.

Production of New Affordable Units through MHA & MFTE

Seattle has two programs that support the production of new income-restricted affordable housing through developer contributions or incentives alongside housing growth: Mandatory Housing Affordability (MHA) and the Multifamily Tax Exemption (MFTE). Under all alternatives, Seattle is expected to gain additional income-restricted units through these programs. However, the alternatives differ in the likely number of affordable units produced. This section briefly describes each program and then compares projected outcomes.

Mandatory Housing Affordability

MHA supports the development of new income-restricted affordable housing in Seattle. To provide affordable housing and mitigate the impacts of development, new commercial, residential, and live–work projects in designated zones must contribute to affordable housing by including affordable units within new development (performance option) or paying into a City fund that supports the creation and preservation of affordable housing (payment option). Specific requirements vary both geographically and by the scale of zoning change that implemented MHA, which in most cases is reflected as a suffix in the zone name.

Development in many areas of Seattle is already subject to MHA requirements. All action alternatives include proposals to rezone areas of the city, which would modify existing MHA requirements or trigger new MHA requirements in those areas. Additionally, the higher total housing growth estimates of the action alternatives mean more overall housing development would be subject to MHA requirements. **Exhibit 3.8-43** compares the projected number of net

new income-restricted units expected under each alternative from the application of MHA on residential development. These projections assume that the City will not extend MHA requirements in any Neighborhood Residential (NR) zone.[58] They show that Alternative~~s 2, 4, and~~ 5 would most substantially increase the number of new income-restricted units produced, compared to No Action~~.~~. The Preferred Alternative would have a smaller positive impact, somewhat lower than Alternatives 2 and 4. ~~while~~ Alternative 3 would have no~~a smaller~~ impact.

Exhibit 3.8-43. Projected New Income-restricted Affordable Units through MHA-Residential (Excluding NR Zones for all Alternatives)

	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Performance Units	1,131	1,614	1,131	1,400	1,787	1,524
Payment Units	9,891	13,544	9,891	13,142	15,505	12,338
Total	**11,022**	**15,158**	**11,022**	**14,542**	**17,293**	**13,862**

Note: These projections assume that the city will not apply MHA requirements in Neighborhood Residential zones. Assumption was 75% payment for stacked flats and 100% payment for attached and detached housing based roughly on recent development. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Source: City of Seattle, 2024~~3~~.

The City ~~is~~ was considering whether to extend MHA requirements to include development in some or all NR zones but is not considering MHA for NR zones in the Preferred Alternative.[59] **Exhibit 3.8-44** shows the ~~likely~~ potential impacts of this change on the production of income-restricted units in Alternatives 1–5 if we assume that MHA requirements in NR zones resemble the existing MHA requirements in other zones. It shows the potential for more income-restricted units produced ~~for~~ in the action alternatives, compared to a scenario where MHA requirements do not apply in ~~Urban~~ Neighborhood Residential zones.

Exhibit 3.8-44. Projected New Income-restricted Affordable Units through MHA-Residential (Including NR Zones where Updated in Alternatives 1-5, Preferred Alternative Does Not Apply MHA to NR Zones)

	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Performance Units	1,131	1,614	1,163	1,400	1,800	N/A
Payment Units	9,891	13,544	13,066	13,142	16,758	N/A
Total	**11,022**	**15,158**	**14,229**	**14,542**	**18,558**	**N/A**

Note: With the exception of the Preferred Alternative, t~~T~~hese projections assume that the City ~~will apply~~ applies MHA requirements in NR zones. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Source: City of Seattle, 2024~~3~~.

[58] NR zones currently are one of the only areas of Seattle where MHA requirements do not apply to residential development.
[59] Note: The Preferred Alternative does not include expanding MHA requirements to NR zones.

Multifamily Tax Exemption

MFTE is a developer incentive that provides a tax exemption on eligible multifamily housing in exchange for setting aside a portion of units as income- and rent-restricted affordable housing. This exemption lasts 12 years, at which point the property owner can renew the tax exemption and affordability requirements or rent those units at market rates. Therefore, new affordable units are added to Seattle's housing supply each year as developers opt-in to the program, while other affordable units come offline when property tax exemptions expire. **Exhibit 3.8-45** shows projections of net new affordable housing units produced through MFTE under each alternative. These projections are based on current trends in use of the program, and the expected new housing production by zone under each alternative. Alternatives 1 and 3 are not expected to increase net MFTE units overall as the number of new affordable units produced with MFTE would equal the number expiring and returning to market rates. Alternatives 2, 4, and 5 and the Preferred Alternative expect modest growth in the total supply of MFTE units.

Exhibit 3.8-45. Projected Net Gain of Affordable Housing Units through MFTE

	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Total	**0**	~~600~~**725**	**0**	~~450~~**636**	~~525~~**1,129**	**865**

Note: The Preferred Alternative was added to this exhibit since the Draft EIS. Based on calculation errors, edits to correct errors for Alternatives 2, 4, and 5 are shown in tracks.
Source: City of Seattle, 2024~~3~~.

Loss of Housing Stock through Demolition

Between 2009 and 2022, more than 600 housing units were lost due to demolition each year in Seattle. Demolition of older housing is expected to continue under all alternatives as lots with older homes are redeveloped with newer and higher-density housing. However, the number of units demolished is expected to vary widely by alternative, from 5,030 units in Alternative 1 to ~~9,148~~11,086 units in the Preferred Alternative ~~3~~, as shown in **Exhibit 3.8-46**. This table also shows the ratio of net new units per demolished unit. Here Alternatives 1 and 2 have the highest ratio, while the Preferred Alternative and Alternative 3 have~~s~~ the lowest. The reason for this variation is discussed in detail below.

Exhibit 3.8-46. Projected Housing Units Demolished by EIS Analysis Area and Alternative

Area	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Area 1	871	1,192	1,662	1,330	1,758	2,970
Area 2	1,103	1,391	2,636	2,202	2,274	2,657
Area 3	389	534	484	473	565	923
Area 4	810	810	810	810	810	797

Area	Alternative 1: No Action	Alternative 2: Focused	Alternative 3: Broad	Alternative 4: Corridor	Alternative 5: Combined	Preferred Alternative
Area 5	685	929	735	745	915	1,213
Area 6	565	767	1,404	1,070	1,374	1,492
Area 7	80	85	48	87	140	144
Area 8	527	637	1,369	918	1,284	890
Total units demolished	5,030	6,345	9,148	7,635	9,120	11,086
Total net new units	80,000	100,000	100,000	100,000	120,000	120,000
Ratio of net new units to units demolished	**15.9**	**15.8**	**10.9**	**13.1**	**13.2**	**10.8**

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Source: City of Seattle, 2024~~3~~. BERK, 2024~~3~~.

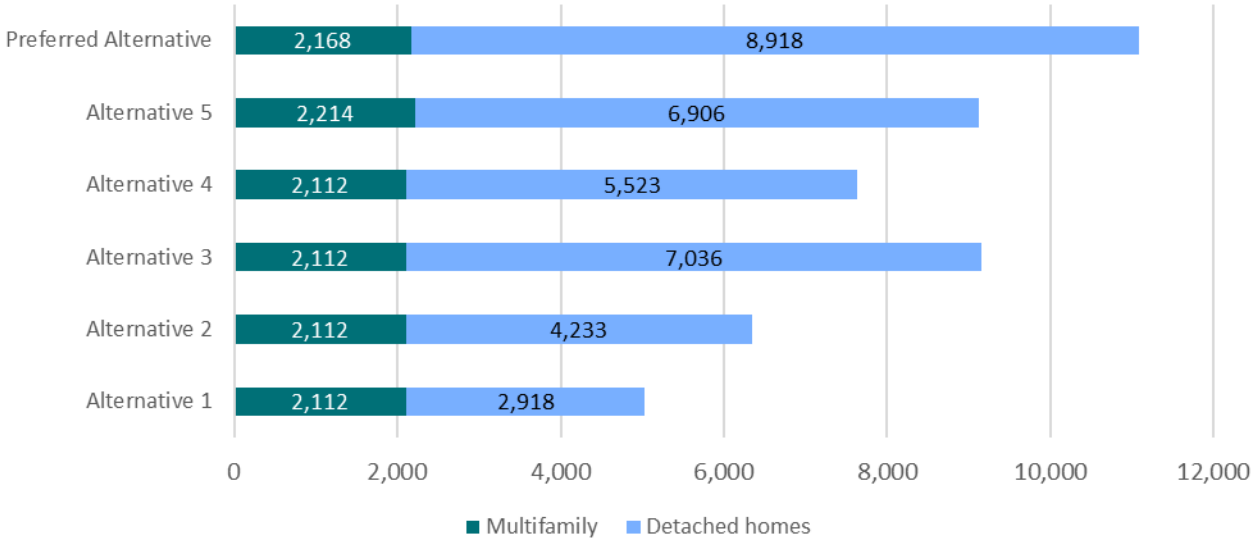
Two factors play the largest role in determining projected demolitions. The first is the total amount of housing growth. Alternatives with more projected growth typically have higher rates of demolition, given that more lots would redevelop to accommodate the additional growth. This explains why Alternative 1, which would have the least housing production, is projected to have the fewest total demolished units~~tions~~.

The second factor is the amount of housing growth by place type. Alternatives 1 and 2 focus more growth in regional centers, urban centers, and, for Alternative 2, neighborhood centers and therefore are expected to see much of the net new housing produced as higher-density apartment and condominium buildings. Many of these buildings would be constructed on lots that were formerly in commercial use and therefore do not include housing units. Additionally, this ~~N~~new housing ~~built at~~would be relatively higher densities and therefore ~~require fewer parcels to redevelop to accommodate a given amount of growth, and~~ more net new units are produced for every home demolished. On the other hand, the Preferred Alternative, as well as Alternatives 3~~, 4~~, and 5 all anticipate more low- and moderate-density housing produced outside centers. The parcels redeveloped for this housing are more likely to include older detached homes. Additionally, ~~G~~given its lower density, new development in these areas would produce fewer net new units for every older unit demolished. For example, an existing detached home demolished and replaced with a new detached home and two ADUs produces two net new units for every one demolished unit. But if that same home is replaced instead with a six-plex, five net new units occur for one demolished unit.

The type of housing demolished would also vary. **Exhibit 3.8-47** shows the projected number of detached homes and multifamily housing units that would be demolished by alternative. Almost no variation exists in the number of multifamily units demolished across alternatives, with the exception that the Preferred Alternative and Alternative 5 are~~is~~ expected to result in slightly more demolitions. This is because the alternatives vary primarily in the amount of growth expected in new place types located where detached homes currently predominate. As a

consequence, most demolitions are expected to be older detached homes, and the total number of detached homes expected to be demolished varies substantially across alternatives.[60]

Exhibit 3.8-47. Projected Housing Units Demolished by Housing Type and Alternative

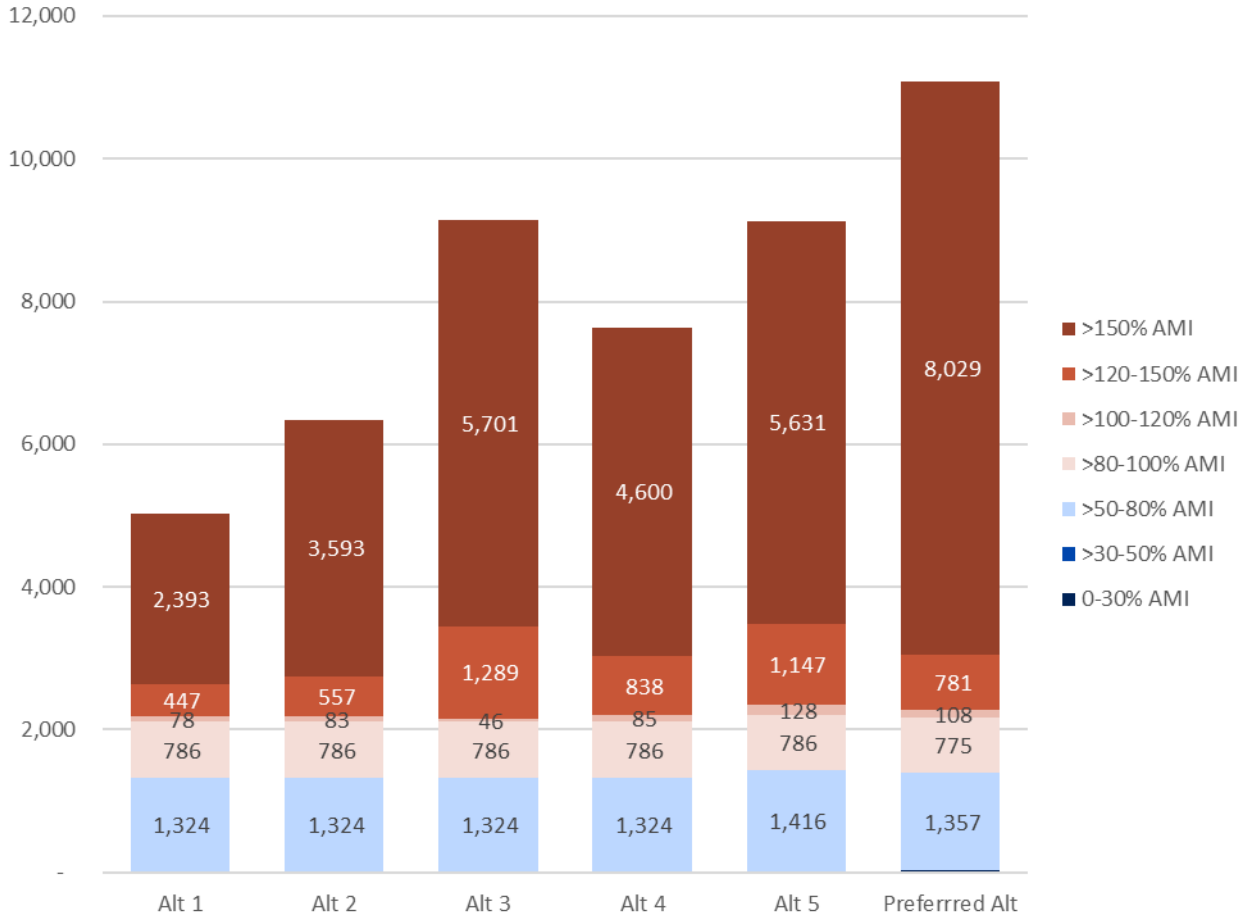


Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Exhibit 3.8-48 presents projections of housing lost due to demolition by affordability level. For detached homes, these projections are based on analysis of median sales price for older detached homes by analysis area (see **Exhibit 3.8-22**). For units in multifamily buildings, these projections are based on the affordability of apartment rents in older structures (see **Exhibit 3.8-20**). This analysis shows that all alternatives are expected to result in the demolition of a similar number of units affordable at 120% AMI or below. The alternatives vary primarily in the number of detached homes demolished, which tend to be affordable only to households with incomes above 120 or 150% AMI, as shown in **Exhibit 3.8-48**.

[60] To develop these projections, the City of Seattle used King County Assessor data to identify parcels most likely to redevelop in the future based on characteristics such as the year built, density of development relative to what is allowed under current zoning, and the ratio of improvement value to land value. Next, the City classified the type of housing currently on redevelopable parcels as single family (detached) or multifamily. Then, for each place type it calculated the percentage of units on redevelopable parcels that are single family or multifamily. Finally, these percentages were applied to the estimate of total demolished housing units by place type to calculate single family and multifamily units demolished. For all growth outside the place types defined in Alternative 1, this analysis assumes all demolished units are detached homes.

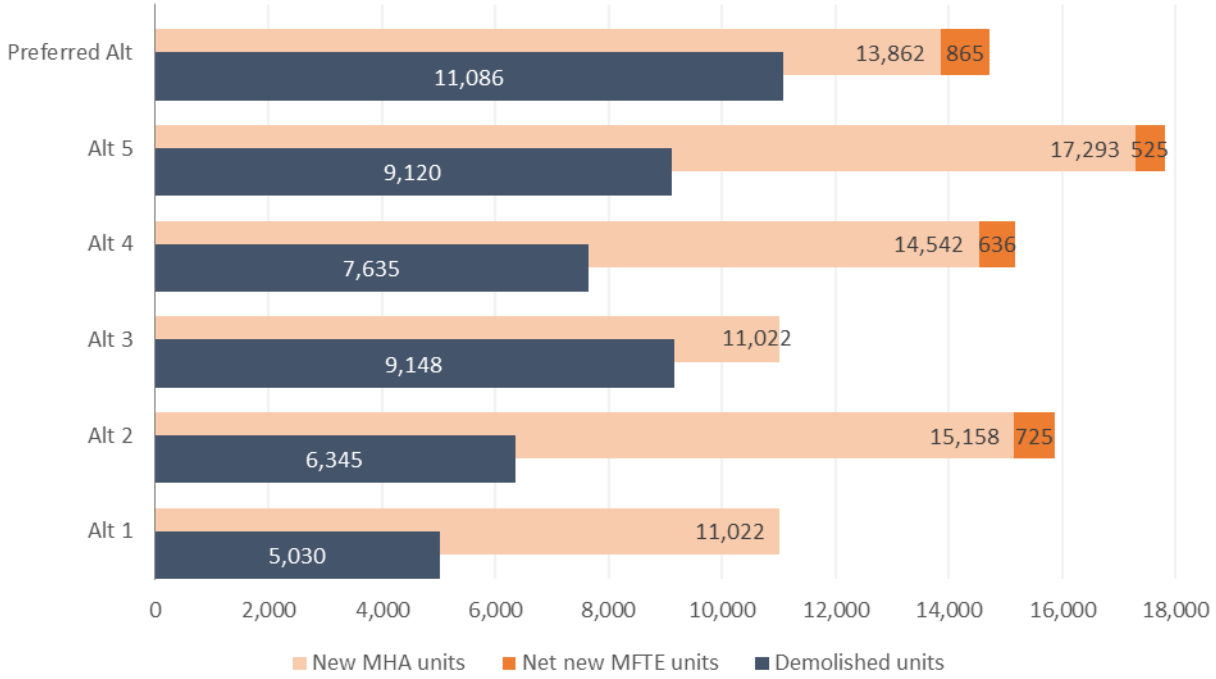
Exhibit 3.8-48. Projected Housing Units Lost to Demolition by Affordability Level



Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5. No units from affordable at 30-50% AMI are projected to be demolished in any alternative. A very small number of 0-30% AMI units (2-40~~12~~) could be demolished. These counts are not shown in the chart.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Exhibit 3.8-49 compares the projected number of demolished units to the projected number of new income-restricted affordable units produced through MHA and MFTE combined. In Alternatives 1, 2, 4, and 5 the number of new affordable units substantially exceeds the number of units demolished. In Alternative 3, new affordable units only slightly exceed demolitions, in part because of the assumption that MHA would not apply in NR zones. Alternatives 2 and 5 are expected to create the most new affordable units per unit demolished.

Exhibit 3.8-49. Comparison of Demolished Units to New Affordable Housing from MHA and MFTE



Note: The Preferred Alternative was added to this exhibit and net new MFTE units revised for Alternatives 2 and 4 (see **Exhibit 3.8-45**) since the Draft EIS—no other edits were made to Alternatives 1–5. This chart does not show total new housing supply. Alternative 5 and the Preferred Alternative would provide 120,000 net new units, Alternatives 2-4 would provide 100,000 net new units, and Alternative 1 would provide 80,000 net new units. Additionally, these projections assume that the City will not apply MHA requirements in any NR zone. Applying MHA would result in additional production of new income-restricted affordable housing.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Displacement

This section evaluates the potential for displacement of Seattle households under each alternative. The first part estimates physical displacement associated with demolished housing units. This is followed by a discussion of how economic and cultural displacement pressures may vary by alternative.

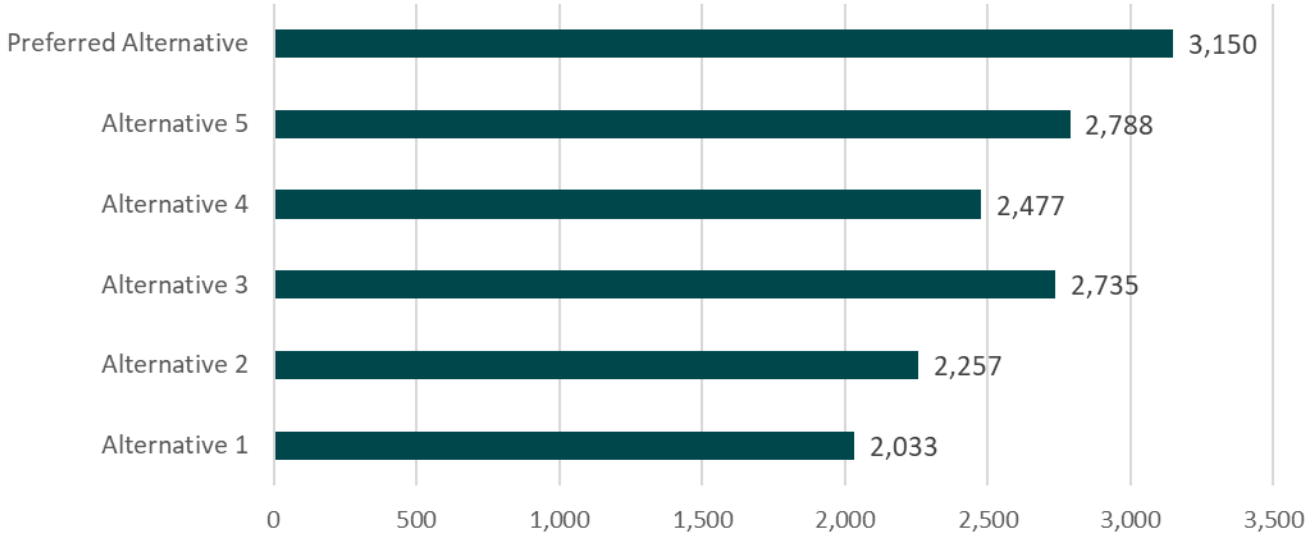
Physical Displacement

Not all demolitions result in the physical displacement of a household. For example, a homeowner may choose to sell their home to a developer or demolish it themselves in order to build a larger home. Renter households, however, are more likely to be physically displaced if the owner of their building decides to demolish the building they occupy. In some circumstances a renter household whose unit is demolished may not be considered physically displaced (e.g., they voluntarily ended their lease and the building owner subsequently decided to demolish the building). Similarly, in some circumstances a renter household might be physically displaced from their unit but relocate within the same neighborhood. This renter would be physically displaced from their unit but not from their neighborhood. Conversely, a

renter household might be physically displaced under circumstances apart from demolition, like eviction or the expiration of rent restrictions. Overall, estimating the number of renter households residing in units projected to be demolished is one way to conservatively estimate how many households could be physically displaced in each alternative.

Using Census data about the household characteristics of detached and multifamily housing occupants in each analysis area, projections of demolished units by housing type (**Exhibit 3.8-47**), and vacancy rates by housing type, it is possible to roughly estimate how many renter households could be physically displaced in each alternative. The results of this analysis are shown in **Exhibit 3.8-50**. The number of renter households varies less than the total number of units demolished (see **Exhibit 3.8-47**) because the occupants of detached homes are more likely to be homeowners, and much of the variation in demolition by alternative was due to the number of detached homes demolished. Nonetheless, ~~Alternative 5~~the Preferred Alternative would be expected to result in the greatest potential for renter households displaced due to demolitions, while Alternative 1 would be expected to see the fewest.

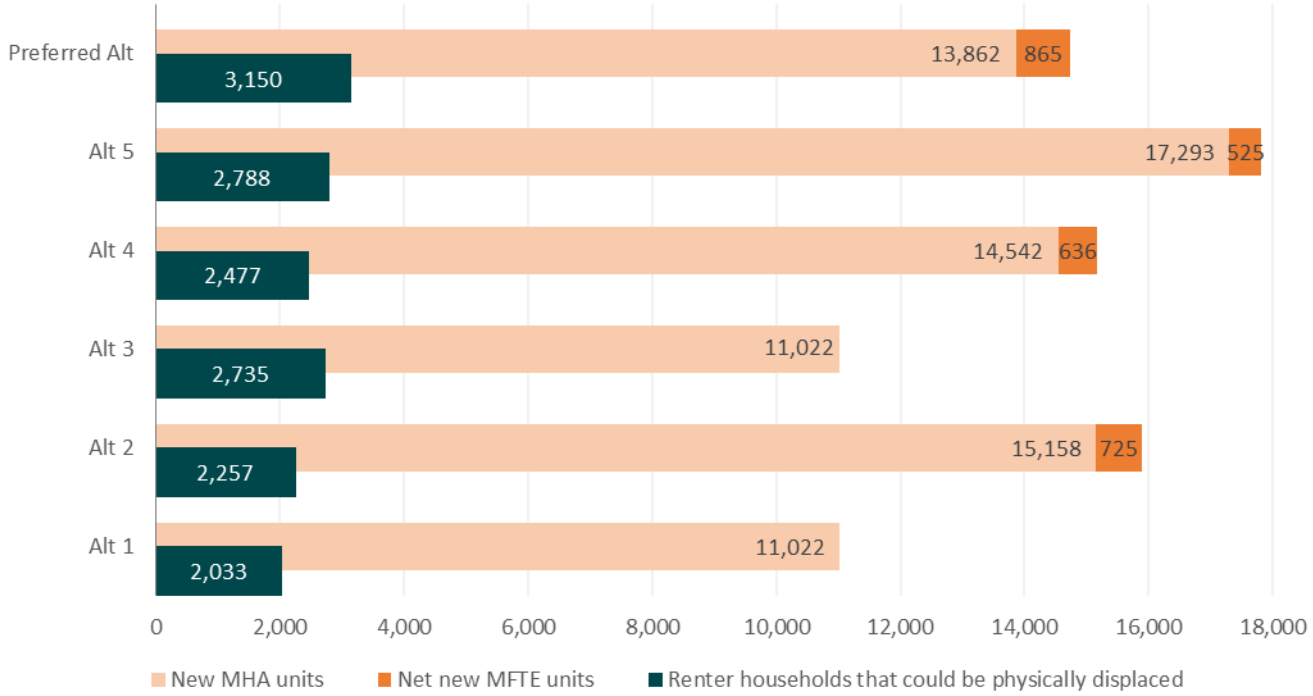
Exhibit 3.8-50. Renter Households Physically Displaced by Alternative



Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: City of Seattle, 2024~~3~~; BERK, 2024~~3~~.

Exhibit 3.8-51 compares the projected number of renter households that could be physically displaced through demolition to the number of new income-restricted affordable units expected to be generated by MHA or MFTE. Across all alternatives, this conservative estimate of physically displaced renter households is much lower than the amount of new affordable housing that would be built during the planning period.

Exhibit 3.8-51. Renter Households Physically Displaced Compared to New Income-Restricted Affordable Units from MHA or MFTE

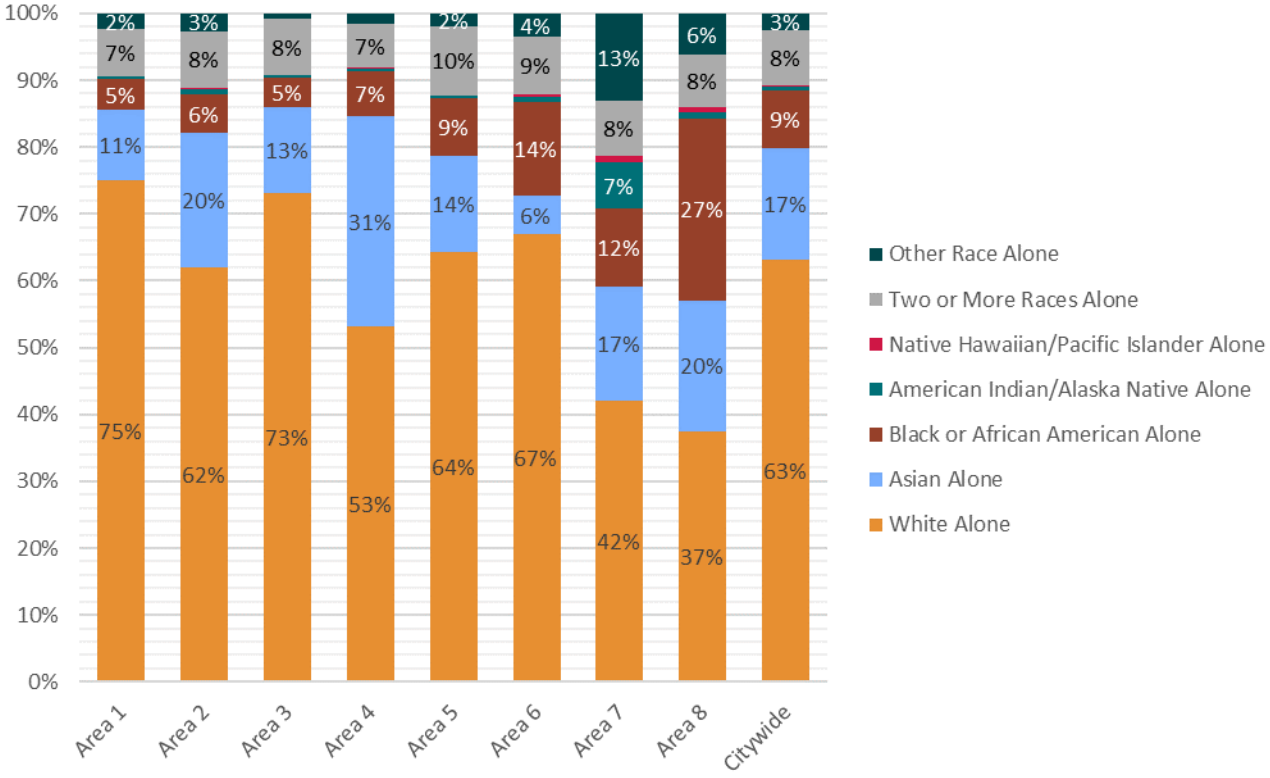


Note: The Preferred Alternative was added to this exhibit and net new MFTE units revised for Alternatives 2 and 4 (see **Exhibit 3.8-45**) since the Draft EIS—no other changes were made to Alternatives 1–5. These projections assume that the City will not apply MHA requirements in any Neighborhood Residential zone. Applying MHA would result in additional new income-restricted affordable housing production.
Sources: City of Seattle, 2023~~3~~4; BERK, 2024~~3~~.

While it is impossible to predict exactly which kinds of renter households are most likely to be displaced in each alternative, information about the characteristics of today's renter households is available. **Exhibit 3.8-52** shows the breakdown of renter households by the race of householder[61] and analysis area. **Exhibit 3.8-53** breaks down renter households by ethnicity. Citywide, about 40% of all renter households are BIPOC, and these households are more likely to be vulnerable to displacement than White, Non-Hispanic households.[62] Areas with a higher proportion of BIPOC householders may see these households displaced at a disproportionately high rate compared to households with White householders.

[61] The Census term householder refers to "the person (or one of the people) in whose name the housing unit is owned or rented (maintained) or, if there is no such person, any adult member, excluding roomers, boarders, or paid employees." Source: https://www.census.gov/programs-surveys/cps/technical-documentation/subject-definitions.html#householder
[62] Source: American Community Survey 5-Year Estimates (2017-2021): S2502—Demographic Characteristics for Occupied Housing Units.

Exhibit 3.8-52. Race of Householder for Renter Households, by EIS Analysis Area



Note: Percentage values less than 2% are not displayed for readability.
Source: American Community Survey 5-Year Estimates (2017-2021): S2502—Demographic Characteristics for Occupied Housing Units; City of Seattle, 2023.

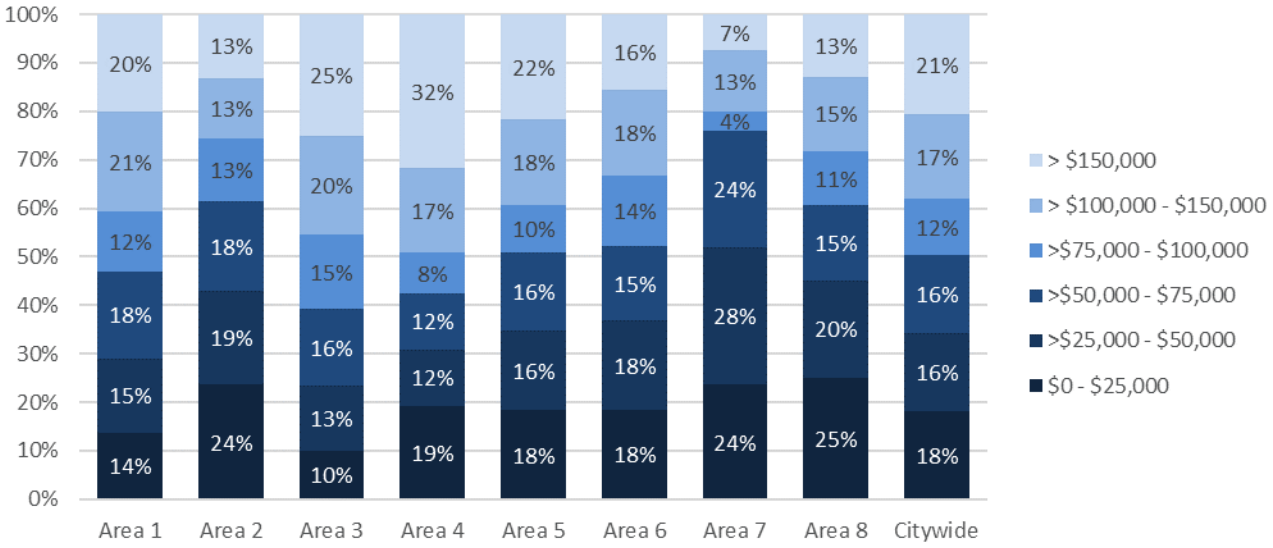
Exhibit 3.8-53. Ethnicity of Householder for Renter Households by EIS Analysis Area

	Area 1	Area 2	Area 3	Area 4	Area 5	Area 6	Area 7	Area 8	Citywide
Hispanic or Latino	7.3%	7.9%	7.6%	6.8%	7.4%	8.5%	27.7%	10.4%	7.9%
Not Hispanic of Latino	92.7%	92.1%	92.4%	93.2%	92.6%	91.5%	72.3%	89.6%	92.1%

Source: American Community Survey 5-Year Estimates (2017-2021): S2502—Demographic Characteristics for Occupied Housing Units; City of Seattle, 2023.

The impact of physical displacement on a renter household would vary based on household income. Compared to higher-income households, lower-income households who are displaced would be ~~much~~ less likely to find adequate housing they can afford within the same neighborhood. **Exhibit 3.8-54** shows household income for renter households across all EIS Analysis Areas and citywide. Just over a third of renter households citywide have incomes at or below $50,000. Some of these households live in income-restricted housing units unlikely to be demolished. Others live in older market-rate housing that may be at risk of demolition.

Exhibit 3.8-54. Household Income for Renter Households by EIS Analysis Area



Source: American Community Survey 5-Year Estimates (2017-2021): B25118—Tenure by Household Income in the past 12 months (in 2021 inflation-adjusted dollars); City of Seattle, 2023.

As discussed in the Affected Environment section above, records from Seattle's TRAO program indicate that about 89 households with incomes 50% of AMI or less are displaced each year due to demolition. This is about 13.5 for every 10,000 renter households at this income level (or 0.1%). While this percentage doesn't account for all physical displacement,[63] it does provide a sense of scale of impact to compare to other trends like economic displacement.

Economic Displacement

Under all alternatives, economic displacement is expected to continue having a much greater impact on Seattle residents than physical displacement, consistent with recent historic trends. This is because demand for housing in Seattle is expected to remain strong, and high demand for housing leads to competition that pushes up market-rate housing prices. However, alternatives that provide more additional housing supply are expected to reduce competition for exiting units and therefore reduce the upward pressure on market-rate housing costs, compared to Alternative 1 (No Action). Alternative 5 (Combined) and the Preferred Alternative are ~~is~~ expected to have the greatest impact on reducing economic displacement pressure because it anticipates the largest increase in housing supply.

The kinds of households economically displaced would also vary by alternative, given that housing produced under each alternative is expected to vary by location, type, and tenure (ownership or rental). For example, Alternative 3 (Broad) is expected to produce considerably more new ownership units than other alternatives. This may provide more options for moderate-income households seeking homeownership and who may otherwise move outside

[63] See discussion under Physical Displacement in **Section 3.8.1 Affected Environment** above.

Seattle to find affordable options. Alternatives 2 (Focused), 4 (Corridors), and 5 (Combined) all provide much more rental housing than No Action and therefore could be expected to see less economic displacement among renter households. As noted earlier, Alternative 5 and the Preferred Alternative would result in the largest increase in overall housing supply and therefore have the greatest potential to reduce market pressures at the root of economic displacement.

Cultural Displacement

Cultural displacement will remain a challenge in Seattle under all alternatives. However, impacts on cultural displacement under each alternative could vary in two main ways. First, alternatives that reduce economic displacement pressures may also reduce cultural displacement pressures. This is because economic displacement often precipitates cultural displacement due to the impacts to social networks that result when members of a cultural community cannot weather rising housing costs. For communities of color, immigrants, and refugees, social cohesion often plays a bigger role in location decisions than for other populations. When community members are pushed out due to economic pressures, other residents, businesses, and institutions may also choose to relocate as well.

The alternatives may also vary in the likelihood of demolition or displacement of cultural assets such as businesses or institutions that serve specific racial or ethnic communities. Since cultural anchors, gathering spaces, arts organizations, small businesses, and religious institutions are not ubiquitous throughout the region, the presence of these cultural assets in certain neighborhoods or areas can have particular importance for racial or ethnic minority households in their location decisions. The zoning changes and patterns of growth proposed under some alternative could affect the likelihood that cultural assets are demolished in favor or redevelopment or replaced by new businesses that cater to the tastes of new residents who do not share the same cultural background. For example, Alternatives 2, 4, ~~and~~ 5, and the Preferred Alternative focus more growth in neighborhood centers or corridors that may currently include older commercial buildings where cultural community-serving businesses and institutions are located.

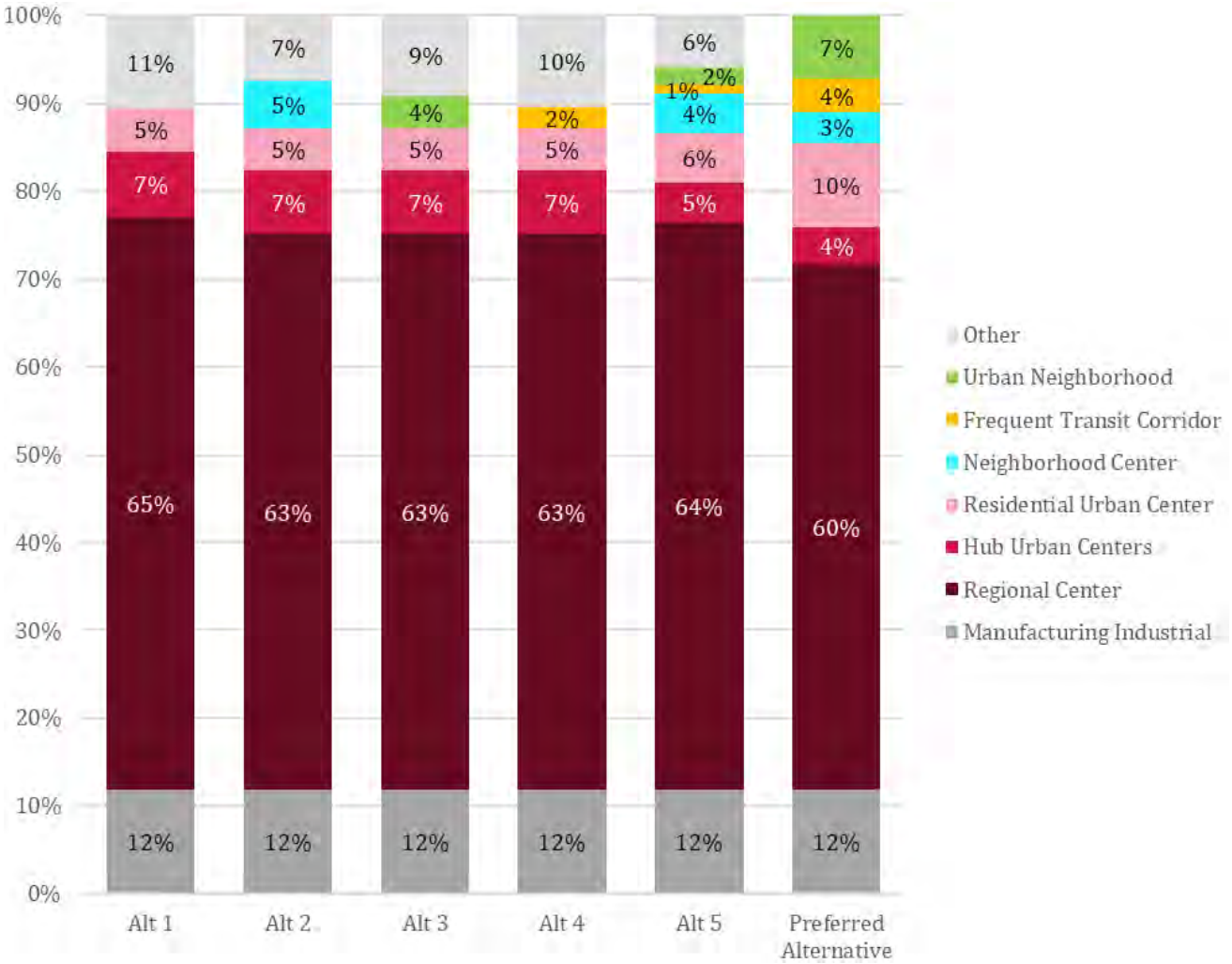
Businesses and institutions serving different communities are also subject to economic displacement pressure regardless of whether their building is demolished. Given the complexity in how people define and access their cultural community, it is difficult to predict the relative impacts of different alternatives on cultural displacement.

Employment

Seattle's total employment is expected to increase by 158,000 jobs in all alternatives. However, the alternatives differ in the pattern of new growth across the city. **Exhibit 3.8-55** compares the share of citywide employment growth expected by place type in each alternative. In all alternatives, most employment growth is expected to occur in ~~urban~~ regional centers such as Downtown, South Lake Union, University District, and Northgate. All alternatives assume 12%

of growth will be in manufacturing industrial areas. The greatest variation across alternatives is in the distribution of growth in the remaining place types. For instance, job growth in neighborhood centers, ~~and~~ frequent transit corridors, and urban neighborhood has the potential to provide more neighborhood-serving businesses and services in areas of the city that currently have few options. The Preferred Alternative ~~2~~ would focus about 14~~5~~% of job growth in these place types ~~new neighborhood centers~~, higher than all other alternatives. It also focuses the most growth in residential urban centers. The result is a pattern of job growth that is more dispersed across the city than expected under No Action and the other action alternatives.~~Alternative 5 would distribute about 5% of jobs across neighborhood centers and corridors combined. Alternatives 1, 3, and 4 offer relatively less job growth in these areas.~~

Exhibit 3.8-55. Employment Growth by Place Type



Note: The Preferred Alternative was added to this exhibit since the Draft EIS and place type names revised to reflect the action alternatives—no changes were made to Alternatives 1–5. "Other" refers to areas outside designated place types. 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 the other alternatives.
Source: City of Seattle, 2023.

Equity & Climate Vulnerability Considerations

See also **Section 3.6 Land Use Patterns & Urban Form** and **Section 3.10 Transportation**.

Seattle's housing affordability crisis disproportionately impacts communities of color and lower-income residents.

Beyond producing cost burden, economic displacement, and housing insecurity, Seattle's rising housing costs limit the amount of money available for other expenses and can curtail a person's ability to access resources necessary for economic success such as education or equity to start a business. High housing costs can also force people to live further from jobs, schools, or social support such as friends and family. This can impact social connection and the community resiliency these connections support. It also has health implications due to increased car dependency and reduced opportunity for active transportation.

Households moving away from Seattle due to displacement or the search for housing they can afford also has climate implications. When households are more dependent on driving and forced to travel further to reach jobs, schools, and local services, they produce more greenhouse gas emissions. Increased demand for housing options on the periphery of the Seattle region also creates pressure to convert more natural areas for residential development.

Alternatives that increase housing supply compared to No Action have greater potential to limit escalating housing costs that cause displacement and provide more opportunities for households to live closer to jobs, schools, social supports, and other amenities in Seattle. However, the types of housing produced also have potential implications for equity. A dearth of moderately priced ownership housing options prevents pathways to homeownership and wealth generation for both low- and moderate-income households. Achieving homeownership often requires moving outside Seattle to find more affordable ownership housing options. However, as discussed already, relocating outside Seattle can have negative impacts not only for the households that moved but also for the climate.

Impacts of Alternative 1: No Action

If the City takes no action, current trends are expected to continue. Housing costs would most likely continue to rise faster than AMI. This would result in the highest economic displacement pressure of all alternatives. This pressure would have disproportionate impact on communities of color, particularly Black and Indigenous residents who are most likely to be vulnerable given their lower median household income (see **Exhibit 3.8-9**). While this alternative is expected to result in the fewest demolished housing units and lowest potential for physical displacement of renter households, it would also yield the lowest production of new affordable housing through MHA and MFTE and the smallest increase in overall housing supply.

Employment growth would continue to be focused in urban centers and urban villages, with more limited change in other areas. As a result, areas with limited neighborhood-serving retail

and commercial development would see little change, and their residents would continue to have very limited options for local services within walking or biking distance.

130th/145th Station Area

Both housing and employment growth would be much lower in the station area compared to the other alternatives. This would limit the number of households and businesses that can benefit from nearby access to the light rail stations. It would also limit the variety of housing choices available.

Equity & Climate Vulnerability Considerations

Housing Affordability

Housing affordability challenges under Alternative 1 would be similar to the existing trends described under Citywide Affected Environment and Impacts Common to All Alternatives. Although there would continue to be new housing built over the next 20 years, the rate of new housing production would likely continue to fall far short of demand, contributing to rising housing costs and disproportionately inequitable outcomes for low-income and BIPOC community members.

Impacts of Alternative 2: Focused

In this alternative, Seattle would grow by 20,000 additional housing units compared to Alternative 1 (No Action). This additional growth would occur in new neighborhood centers, which would increase the number and variety of housing options in existing Neighborhood Residential zones. About 94% of the new housing is expected to be exclusive available for rent and only 6% could support homeownership. This alternative provides the fewest new ownership housing options among all the alternatives, including No Action.

Much of this new growth would be focused in neighborhoods that the City determined have relatively lower risk of displacement (see **Exhibit 3.8-31** above), including parts of EIS Analysis Areas 1, 2, 3, 5, and 6. This could limit the negative impacts of physical displacement while allowing more households to live in areas of higher opportunity. Compared to the other action alternatives, Alternative 2 would result in the fewest units demolished and fewest physically displaced renter households. Alternative 2 would produce more new income-restricted units through MHA and MFTE than any alternative other than Alternative 5.

Alternative 2 will also allow for shops and services in new neighborhood centers. This would result in more Seattle residents living within a short walk or bike ride of these local amenities.

130th/145th Station Area

Alternative 2 would support transit-oriented development in these station areas at higher levels of density than allowed under current zoning. It is expected to more than double the number of new housing units compared to No Action and increase overall housing supply more than any alternative other than Alternative 5. This would allow many more households to live near light rail transit.

Equity & Climate Vulnerability Considerations

Housing Affordability

Except for Alternative 5, Alternative 2 would provide the greatest benefit for low-income renter households. This is due to the emphasis on increased rental housing production and its potential impact on moderating rental housing cost escalation as well as increased affordable housing production through MHA. However, Alternative 2 would provide the least benefit for moderate-income households seeking to access the homeownership market and associated wealth generation opportunities. In some cases, households will choose to move out of Seattle to find ownership housing they can afford. This kind of economic displacement has financial, social, health, and climate implications, as discussed under Impacts Common to All Alternatives.

Impacts of Alternative 3: Broad

Like Alternative 2, in Alternative 3 Seattle would grow by 20,000 more housing units than Alternative 1 (No Action). This additional growth would unfold across all Neighborhood Residential zones. Much of this new housing would be duplexes, triplexes, fourplexes, and stacked flats. Nearly a quarter of all new units produced could be available for homeownership, a much higher share than all other alternatives. This would result in a greater diversity of housing options in areas of Seattle where detached homes currently predominate.

With the exception of the Preferred Alternative, which includes more growth overall, Alternative 3 is expected to result in the most demolitions among all alternatives and the greatest potential for physical displacement of renter households. However, many demolished units would be older detached homes that tend to be relatively less affordable than other housing types. Alternative 3 also produces the fewest new income-restricted units through MHA and MFTE among all action alternatives.[64]

Alternative 3 would increase options for corner shops and flexibility for at-home businesses in Neighborhood Residential zones. This would result in some additional businesses and services in areas where they are currently scarce.

[64] This projection assumes that MHA does not apply in Neighborhood Residential zones. If the City applied MHA in Neighborhood Residential zones, the number of units would be substantially higher (13,043 rather than 9,489 net new affordable units) but still less than expected in all other action alternatives.

130th/145th Station Areas

The station area plan would not be implemented under Alternative 3; the area would grow based on the applicable citywide place types.

Equity & Climate Vulnerability Considerations

Housing Affordability

Except for No Action, Alternative 3 would provide the least benefit for low-income renter households. That is because rental housing supply and new affordable housing through MHA would only see modest increases compared to No Action. However, Alternative 3 would provide the greatest benefit for moderate income-households seeking to access the homeownership market and associated wealth generation opportunities. This is due to the emphasis on increased supply and diversity of housing types offered for sale. This could result in less economic displacement pressure for moderate-income households that wish to remain in the city.

Impacts of Alternative 4: Corridor

Like Alternatives 2 and 3, in Alternative 4 Seattle would grow by 20,000 more housing units than Alternative 1 (No Action). This additional growth would be focused in corridors where transit and amenities are located. About 89% of overall new housing production would be exclusively rental, with the large majority in apartment buildings in regional centers, urban centers, and corridors. However, compared to No Action, this alternative would also increase the supply of ownership housing types.

Alternative 4 is expected to result in more housing units demolished than No Action or Alternative 2 (Focused). However, many demolished units would be older detached homes that are relatively higher cost than other housing types. Alternative 4 would also produce much more new income-restricted affordable housing units than units demolished.

Compared to No Action ~~and other alternatives~~, Alternative 4 would focus more employment growth in corridors near residential areas, with the potential to increase neighborhood-serving businesses and services where they don't exist today.

130th/145th Station Areas

The station area plan would not be implemented under Alternative 4; the area would grow based on the applicable citywide place types.

Equity & Climate Vulnerability Considerations

Housing Affordability

Compared to No Action, Alternative 4 would provide benefits for both low-income renter households as well as moderate-income households that seek to access the homeownership market and associated wealth generation opportunities. This is due to an expected increase in rental housing supply, affordable housing production through MHA, and supply of for-sale housing types.

Impacts of Alternative 5: Combined

In this alternative, Seattle would grow by 40,000 additional housing units compared to Alternative 1 (No Action). Alternative 5 and the Preferred Alternative ~~This is~~have the largest increase in housing supply ~~among any alternative and would result in the greatest expansion of housing diversity of any alternative~~. Like all alternatives, most new housing is expected to be rental, but Alternative 5 would also produce more new ownership housing than ~~all alternatives except~~ Alternatives ~~3~~ 1 and ~~4~~2. Like Alternative 4, much of this new ownership housing would be in small-scale developments in Neighborhood Residential zones.

Alternative 5 is expected to result in more demolished housing units than all other alternatives except Alternative 3 and the Preferred Alternative. However, those demolished units would tend be older detached homes that are relatively higher cost than other housing types. Alternative 5 would produce the most new income-restricted affordable housing units through MHA and MFTE. This alternative, along with the Preferred Alternative, is also expected to have the biggest impact on reducing economic displacement by providing the largest increase in the supply of housing.

Compared to No Action, Alternative 5 would distribute employment growth across more areas of the city, including in new neighborhood centers and corridors where neighborhood-serving businesses and services are currently scarce.

130th/145th Station Area

This alternative would create a new urban center around the NE 130th St station area. This change would support transit-oriented development and the most housing and job growth compared to the other alternatives.

Equity & Climate Vulnerability Considerations

Housing Affordability

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. Compared to No Action, it would also provide benefits for moderate income-households seeking to access the homeownership market and associated wealth generation opportunities. This is due to the increased supply and diversity of housing types that can be sold to homeowners. However, ~~both~~ the Preferred Alternative as well as Alternatives 3 and 4 are expected to produce more ownership housing.

Impacts of Preferred Alternative

Note: The impacts analysis for the Preferred Alternative was added since the Draft EIS.

Under the Preferred Alternative, Seattle would grow by 40,000 additional housing units compared to Alternative 1 (No Action). Along with Alternative 5, the Preferred Alternative would have the largest increase in housing supply. Like all alternatives, most new housing is expected to be rental, but the Preferred Alternative would also produce the most new ownership housing among all alternatives. Much of this new ownership housing would be in small-scale developments in Neighborhood Residential zones.

The Preferred Alternative is expected to result in more demolished housing units than all other alternatives. However, those demolished units would tend be older detached homes that are more likely to be owner-occupied and relatively higher cost than other housing types, and the Preferred Alternative is expected to produce significantly more income-restricted affordable housing units through MHA and MFTE than units demolished. Additionally, this alternative, along with Alternative 5, is expected to have the biggest impact on reducing economic displacement by providing the largest increase in the supply of housing.

Compared to No Action, the Preferred Alternative would distribute employment growth across more areas of the city, including in new neighborhood centers and corridors where neighborhood-serving businesses and services are currently scarce.

130th/145th Station Area

This alternative would create a new urban center around the NE 130th St station area. This change would support transit-oriented development and the most housing and job growth compared to the other alternatives.

Equity & Climate Vulnerability Considerations

Housing Affordability

The Preferred Alternative would benefit low-income renter households compared to the No Action Alternative due to its impact on increasing rental housing supply and new affordable housing through MHA and MFTE. However, this benefit would be somewhat smaller than Alternative 5, which focuses more growth into rental housing. The Preferred Alternative would provide the greatest benefits for moderate income-households seeking to access the homeownership market and associated wealth generation opportunities. This is due to the

increased supply and diversity of housing types that can be sold to homeowners. The Preferred Alternative is expected to produce the greatest amount and diversity of new ownership housing among all alternatives.

3.8.3 Mitigation Measures

Incorporated Plan Features

All action alternatives would increase the supply of housing in Seattle, most significantly Alternative 5 (Combined) and the Preferred Alternative, which would reduce competition for housing and slow housing cost increases over time. The action alternatives also focus relatively more future housing production in areas with low displacement risk to reduce development pressure in areas with high displacement risk where rapid market-driven housing production can have localized impacts on households and communities vulnerable to displacement.

Under the action alternatives, the City could also update Comprehensive Plan policies to further address current and future risk of displacement. For example, the Housing Element would add new policies around addressing displacement.

Regulations & Commitments

Seattle's municipal code contains regulations for housing and tenant protections. Below is a summary of these regulations and of existing policies and programs that would mitigate impacts associated with the alternatives. See also **Appendix C** for other state and county measures that reduce impacts such as displacement.

Mandatory Housing Affordability (MHA)

Commercial and multifamily residential development in Seattle is generally subject to MHA, which requires a contribution to affordable housing as a condition of permit issuance. Developers have a choice between reserving a portion of units at affordable prices for low-income households or making a payment to the City's affordable housing fund. Most development in all alternatives would occur in zones that currently have MHA. This would result in production of affordable units on-site (through the performance option) and in investments in production and preservation of affordable housing (through the payment option).

Multifamily Tax Exemption (MFTE)

Since its adoption in 1998, the MFTE program has produced affordable units by incentivizing builders to reserve 20 or 25% of the dwelling units in new multifamily structures at affordable rents or sales prices for low- and moderate-income households. In exchange for on-site affordable housing, the City provides a partial property tax exemption for up to 12 years, with

an option to extend the affordability commitment for a continued tax exemption. MFTE is available in all zones that allow multifamily development. The affordability level of rental dwelling units reserved for income-eligible households varies according to unit size as follows:

- 40% of AMI for congregate residence sleeping rooms
- 40-50% of AMI for small efficiency dwelling units (SEDUs)
- 60% of AMI for studio units
- 70% of AMI for one-bedroom units
- 85% of AMI for two-bedroom units
- 90% of AMI for three-bedroom and larger units

Ownership units provided through MFTE must be affordable at 100% or 120% of AMI depending on unit size.

All alternatives are expected to see a substantial portion of future housing growth in zones where MFTE is available.

Affordable Housing Funding Programs

In addition to MHA and MFTE, which produce units with rent and sales price restrictions through development, several other sources of funding produce and preserve affordable housing and stabilize low-income households in Seattle. The primary funding source is the Federal low-income housing tax credit (LIHTC) program. Locally, the City has a Housing Levy, a voter-approved property tax passed most recently in 2016. ~~Later i~~In 2023, voters approved~~will consider~~ a ~~proposed~~ $970 million Housing Levy renewal. Funds from these and other sources sustain several housing programs operated by the Office of Housing, including:

- The **Rental Housing Program** funds production and preservation of rental housing that serves low-income Seattle residents for a minimum of 50 years.
- The **Homeownership Program** funds the development of new for-sale housing stock sold to low-income, first-time homebuyers at affordable prices for a minimum of 50 years.
- The **Home Repair Program** funds critical health and safety repairs that help low-income homeowners preserve their asset and remain in their homes.
- The **Weatherization Program** funds energy conservation and indoor air quality improvements that support health, enhance living conditions, and lower utility bills for low-income homeowners and renters.

Tenant Protections

Seattle has adopted a suite of tenant protections in recent years. In 2016, the City Council passed legislation banning discrimination against prospective tenants who use alternative forms of income to pay rent, like social security, child support, or unemployment benefits. This expanded existing protections for tenants paying for rent with Federal Section 8 housing vouchers. Renters in Seattle also have protection under the Just Cause Eviction Ordinance,

which requires landlords to have one of 16 "Just Cause reasons" if they want to terminate a tenancy. Other tenant protections help to ensure safe and healthy rental housing, uphold Fair Housing law, and prohibit rent increases in units with housing and building maintenance code violations.

Relocation Assistance

Seattle has two forms of relocation assistance for tenants who are forced to move. The Tenant Relocation Assistance Ordinance (TRAO) provides relocation assistance to low-income households who are considered displaced due to their housing being torn down, substantially renovated, undergoing a change of use, or removing certain rent and income restrictions. In these cases, property owners and developers must obtain a Tenant Relocation License, and income-eligible renters receive relocation assistance of $4,486, paid equally by the property owner the City.

More recently, in 2022 the City Council established Economic Displacement Relocation Assistance (EDRA), which provides financial support to income-eligible tenants if their landlord increases housing costs by 10% or more during a 12-month period. This provides assistance to low-income households displaced not through physical alteration of their housing but housing cost increases.

Equitable Development Initiative (EDI)

EDI was created in 2016 to address displacement resulting from inequitable growth in Seattle. Since then, EDI has awarded funding to dozens of community-driven anti-displacement projects in neighborhoods at high risk of displacement. Funding supports property ownership among Seattle's diverse cultural communities through site acquisition, capital projects, and capacity building.

Other Potential Mitigation Measures

Although not required to address identified impacts, the City could pursue the following kinds of actions to address possible population, employment, and housing conditions.

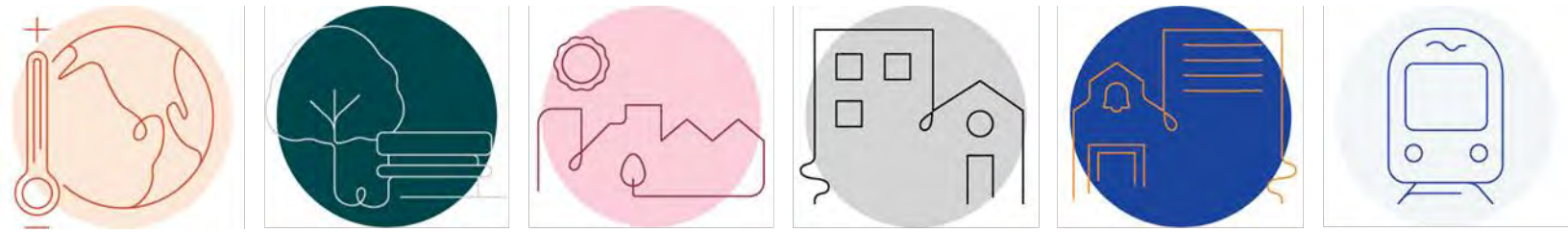
- ~~**Implement MHA requirements in Neighborhood Residential zones.** The City could apply MHA requirements through changes in NR zones. This would increase affordable housing production in Alternatives 3 and 5, which contemplate allowing a greater amount and variety of housing in NR zones.~~
- **Develop an acquisition strategy for naturally occurring affordable housing.**
- **Increase funding for programs combating displacement.** To address the potential for residential, commercial, and cultural displacement under any alternative, the City could pursue various actions that support the stability and retention of existing households, and the preservation and creation of new, cultural institutions and businesses. Examples of potential anti-displacement actions include:

  - Increasing funding for Seattle's Equitable Development Initiative (EDI) to expand the ability of community organizations to acquire and development property in neighborhoods at high risk of displacement.
  - Supporting low-income homeowners to add housing on their property to stay in place and build wealth. Homeowners who have low or fixed incomes may struggle with the rising costs of property ownership, including taxes and maintenance costs, and may also face challenges to adding housing to their property that could generate income or meet their household needs despite current or future zoning capacity that allows additional density. The City could fund programmatic efforts to help homeowners overcome awareness, financing, design, permitting, or other barriers.
  - Strengthen the Office of Economic Development's (OED) small business support programs. OED has provided a range of support services for small businesses, including access to capital, storefront repair, a stabilization fund pilot, and a tenant improvement fund pilot. Resources for these or similar programmatic efforts could mitigate potential commercial displacement pressure.
  - Establish and fund a program that supports tenant or community ownership of rental housing when it becomes available for purchase.
- **Strengthen relocation assistance programs.** As described above, TRAO and ERDA provide relocation assistance to low-income households displaced due to removal or alteration of their housing or increasing housing costs. The City could pursue policy or funding changes that would increase the number of households receiving assistance or the amount of assistance received.
- **Density bonuses:** The City could allow projects that set aside a significant portion of their units as income-restricted affordable housing to receive extra height or floor area.

3.8.4 Significant Unavoidable Adverse Impacts

Over time, additional growth and development will occur in Seattle, and much of this growth will occur through redevelopment. The alternatives vary based on the amount, types, and geographic pattern of existing housing and businesses that may be demolished to make way for new growth. While this can contribute to the risk of physical displacement, that risk is not significantly higher in the action alternatives. Moreover, the benefits in terms of reduced economic displacement pressure and increased production of affordable units offered by the action alternatives outweigh any increased risk of physical displacement. Therefore, no significant unavoidable adverse impacts to population, employment, or housing are expected under any alternative.

3.9 Cultural Resources





Source: Sunita Martini via City of Seattle, 2023.

This section describes the current conditions (affected environment), analyzes the alternatives' potential impacts on cultural resources (which includes historic-period architectural resources and precontact and historic-period archaeological resources), details the current cultural resources policy and regulatory frameworks, and suggests possible mitigation measures. Finally, it summarizes any significant unavoidable adverse impacts.

What are Cultural Resources?

Cultural resources are:

- **Architectural resources** (buildings, structures, sites, landscapes, objects, and districts) that are of the historic period, which is generally 25 years old or older (under the Seattle Landmarks program) or 40 years old or older (National Register of Historic Places)
- **Archaeological resources**, including precontact Native American artifacts, features, and sites; Traditional Cultural Properties; and historic-period artifacts, features, and sites.

Adverse effects or impacts to cultural resources are defined by the Advisory Council on Historic Preservation as impacts that alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register of Historic Places (NRHP) in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association (36 CFR 800.5). Adverse impacts may include reasonably foreseeable impacts caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative. Below are some examples of adverse impacts on cultural resources:

- Physical destruction or damage to all or part of the resource;
- Moving the resource from its historic location;
- Change of the character of the property's use or of physical features within the resource's setting that contribute to its historic significance; or
- Introduction of visual, atmospheric, or audible elements that diminish the integrity of the resource's significant historic features.

Impacts of the alternatives on cultural resources are considered significant if they result in:

- Substantial changes to or alteration of features or characteristics, or loss (removal or demolition) of a cultural resource that that prevent their eligibility for inclusion as a designated Seattle Landmark (SL), or inclusion in the NRHP, National Historic Landmark (NHL) program, or the Washington Heritage Register (WHR).
- More than a moderate adverse impact (potential loss of or alterations to the physical evidence or tangible evidence of cultural history) to Culturally Important Resources (CIR), which for the purposes of this EIS are important to certain cultural groups or communities, whether or not they are listed or eligible for the SL, NRHP, or WHR.

Resources that have been officially determined not eligible for these registers or considered CIR will not be adversely impacted by the proposed alternatives.

3.9.1 Affected Environment

This section describes the precontact, ethnographic, and historic contexts of the areas within the city as background by which to address the potential for impacts to cultural resources.

Indigenous Settlement Context

Based upon current scientific understandings of the archaeological record, the earliest human occupations in the Pacific Northwest were characterized by highly mobile bands of broad-spectrum foragers. The widespread Clovis culture, the first well-defined cultural complex in North America, has been dated to between 12,800 and 13,200 calibrated years before present (cal. B.P.) (Ames and Maschner 1999:65–66; Kirk and Daugherty 2007:13). Recent research suggests that large stemmed projectile points (i.e., Western Stemmed complex) may have been produced by populations pre-dating Clovis (e.g., Jenkins et al. 2012). Such points have been identified at the Cooper's Ferry site in western Idaho, which has been dated to between 16,560 and 15,280 cal. B.P. (Davis et al. 2019). These early Paleoindian cultures consisted of small, nomadic bands that specialized in hunting a variety of small- to large-sized game animals, including megafauna that went extinct across North America at the end of the Pleistocene (e.g., wooly mammoth [*Mammuthus primigenius*], mastodon [*Mammut americanum*], ancient bison [*Bison antiquus*]) (Kirk and Daugherty 2007:13).

Following the Clovis period, early and middle Archaic populations across western Washington produced large, willow leaf-shaped ("Olcott" phase) projectile points, in addition to lanceolate points and scrapers (Ames and Maschner 1999; Kopperl et al. 2016; Nelson 1990:483). Similar projectile points have been found in sites from the Fraser River Valley in British Columbia down to the margins of the Columbia River, indicating the wide dispersal of related groups across the broader Northwest Coast during this period. Sites containing Olcott material are most commonly documented well inland from the coast along rivers, suggesting that these populations were likely still subsisting largely upon terrestrial plant and animal resources and had not yet developed the extensive reliance upon riverine and coastal food resources observed among later Coast Salish peoples (Kopperl et al. 2016; Nelson 1990:483).

Between approximately 6400 and 2500 cal. B.P., there was a gradual shift across the Northwest Coast to an increasingly heavy reliance on marine and riverine resources for subsistence. This shift coincided with a general trend toward increasing sedentism as more sites were settled along river courses, estuaries, and productive marine environments (Ames and Maschner 1999:93–94; Nelson 1990:483). During this period, settlements began to be occupied on a seasonal basis. Larger, denser artifact concentrations have been identified within sites dating from 6400 to 2400 cal. B.P., and deep shell middens have been dated to as early as 5,200 years ago (Larson and Lewarch 1995; Mierendorf 1986:57; Wessen 1988). It was during this time that coastal and neighboring inland communities developed their complex suites of lithic, bone, and antler tool technologies suited for marine mammal hunting, riverine fishing, and the

further exploitation of terrestrial plant and animal resources (Ames and Maschner 1993:93–95; Blukis Onat et al. 1980:29–30; Kopperl et al. 2016:117–118).

Along with steady population growth and increasingly intensive resource utilization across the broader Northwest Coast, Late Pacific (2400–200 cal. B.P.) precontact archaeological sites in the region demonstrate the emergence of status differentiation and complex social hierarchies (Ames and Maschner 1999:95–96). Increased reliance on stored foods and controlled access to resources, including salmon and shellfish, also developed during this period. By this time, the general ethnographic (prior to Euroamerican influence) pattern observed along the Northwest Coast had become well-developed, although these societies saw swift and dramatic changes with the arrival of Euroamerican explorers, traders, and settlers beginning in the late 1700s (Ames and Maschner 1999:95–96, 112).

The EIS study area is within the traditional territory of the Lushootseed-speaking Duwamish people. The settlements of this ethnographically documented Coast Salish group were principally located along the Duwamish, Black, and Cedar Rivers, as well as along the coasts of Puget Sound and Lake Washington in the vicinity of present-day Seattle (Duwamish Tribal Services 2018; Ruby and Brown 1992:72). The Duwamish were part of the broader Southern Coast Salish culture, which was generally adapted toward the intensive utilization of marine and riverine resources (Suttles and Lane 1990). A principal division among the Duwamish existed between the Sxwaldja'bc ("saltwater dwellers") who lived in settlements on Puget Sound and the Xatcua'bc ("lake dwellers") who lived along the shores of Lake Washington. The latter, as well as Duwamish groups living along the interior rivers of the region, were considered to be poorer and lower-status than the coastal communities (Hilbert et al. 2001:45; Ruby and Brown 1992:72–73; Suttles and Lane 1990:485–486; Swanton 1952:26). The three main peoples with winter settlements within the Seattle area were the dùd¢w...abí ("People of the Inside"), who lived primarily along the Duwamish River; the Hachooabsh ("Lake People"), who lived along the shores of Lake Washington; and the Shilshoolabsh ("People of Tucked Away Inside"), who lived primarily around Salmon Bay in what is today the Ballard neighborhood. The anglicized version of the first of these groups, Duwamish, was eventually applied as a general name covering all of the distinct populations living in the greater Seattle area (Duwamish Tribal Services 2018; Hilbert et al. 2001:45–50; Thrush 2007:23).

While Seattle represents the ancestral lands of the Duwamish, Hachooabsh, and Shilshoolabsh, Coast Salish groups living throughout Puget Sound, including the Snoqualmie, Suquamish, Muckleshoot, Stillaguamish, and Tulalip, routinely visited the area. These groups utilized Elliott Bay and the surrounding environment for hunting, gathering, and fishing purposes, as well as to trade with resident communities (Haeberlin and Gunther 1930; Spier 1936; Swanton 1952).

Like other Southern Coast Salish peoples, the Duwamish relied heavily upon salmon and other fish for subsistence and utilized a diverse suite of technologies to harvest them in different settings. They made use of trolling, seine, and gill net technologies to harvest fish in Puget Sound, while weirs, nets, gaff hooks, harpoons, and spears were all employed in rivers (Suttles and Lane 1990:488–489). Terrestrial mammals, especially black-tailed deer and elk were also

hunted by the Duwamish and neighboring Tribes using the bow and arrow, and they gathered a great variety of plant foods, including edible roots, bulbs, and berries (Duwamish Tribal Services 2018; Gunther 1945; Suttles and Lane 1990:489).

The Duwamish lived a semi-sedentary lifestyle, spending part of the year in permanent winter settlements and the warmer months in temporary encampments from which they fished, hunted, and gathered plant resources. Smaller bands would travel across their territory to hunt and forage for plant resources during the summer months, returning to their permanent settlements for the ceremonially rich winter season and to intensively fish in the spring and autumn (Duwamish Tribal Services 2018; Suttles and Lane 1990).

In 1855, members of the Duwamish and neighboring Puget Sound Tribes signed the Treaty of Point Elliott, which directed the removal of Tribal members to reservations. The Duwamish were ordered to relocate to the Port Madison Reservation, along with the Suquamish (Lane 1975:3–4). Created by ships dumping their ballast at the Seattle waterfront before loading their cargoes, Ballast Island (45KI1189) became an important gathering place for Tribal members from across Washington, British Columbia, and Alaska, as well as a permanent residence for Duwamish peoples forced from their homes elsewhere by the 1880s. Following the 1865 passage of an ordinance banning Tribal members from residing within the city limits, Ballast Island was a location in Seattle that the Duwamish and visiting Native peoples were grudgingly permitted to inhabit because it was not considered to be a part of the city proper. Following repeated attempts by the city government to expel the Tribal occupants of the island in the 1890s, waterfront developments eventually encroached on Ballast Island in 1898 and Tribal peoples residing there were forced to leave (Curti et al. 2020; Duwamish Tribal Services 2018; Elder 2014). The site is today recognized as a traditional cultural property (TCP) for numerous Tribes of the Puget Sound region and is listed in the NRHP and WHR (Curti et al. 2020). Many Duwamish had also remained along the Black River in defiance of federal government orders but were likewise removed from their ancestral lands by the early 1900s (Lewarch et al. 1996:3–13).

The Duwamish Indian Tribe petitioned for federal recognition in 1979. In 2001, the federal government rejected the petition, reversing the decision of the previous administration to recognize its Tribal status. The Duwamish Indian community continues to pursue recognition, build their community, and maintain their cultural traditions (Duwamish Tribal Services 2018; Thrush 2007:196–197).

At least 11 Indigenous winter settlements were located within the Seattle area when non-Indigenous explorers and settlers first began arriving in Puget Sound. Several of these settlements were located around the mouth of the Duwamish River and the expansive tidal marshes that once stretched across the area now occupied by downtown Seattle, as well as along the lower reaches of the Duwamish River. The settlement of tõ...ul...altù (“where herring live” or “herring house”), was situated to the west of the mouth of the Duwamish River under the West Seattle bluff. An unknown Euroamerican settler burned the town down in 1893, and its name was eventually given to Terminal 107 Park (Hilbert et al. 2001:46; Thrush 2007:234).

The winter settlement of y¢l•çad (“basketry cap”) was named for the distinctive woven hats worn by peoples such as the Yakama, perhaps because its residents participated in trade networks that spanned the Cascades. This settlement was located along the west bank of the Duwamish River west of Kellogg Island (Dailey 2020; Hilbert et al. 2001:119; Thrush 2007:236–237). A third settlement, dùç•ó¢d (“Place of the Fish Spear”), was located atop a large flat next to the Duwamish River at what is presently the north end of Boeing Field (Hilbert et al. 2001:47; Thrush 2007:240). To the north, in the vicinity of the Old Rainier Brewery along U.S. Interstate 5 (I-5), the settlement of tutõ¿aqs (“Little-Bit-Straight Point”) included three longhouses as well as a small stockade and lookout used to guard settlements up the Duwamish River (Hilbert et al. 2001:61; Thrush 2007:235).

Three winter settlements were located in the area of present-day downtown Seattle between the SoDo and Belltown neighborhoods. The large settlement of sä•ä¢l...ali• (“Little Crossing-Over Place”) was situated on both sides of a promontory overlooking a tidal marsh in the vicinity of present King Street Station and included up to eight longhouses (Hilbert et al. 2001:46; Thrush 2007:229). The smaller settlement of ß¢l½‹qabiù (“Grounds of the Leader’s Camp”) was located between Cherry and Seneca Streets and First and Second Avenues, while the settlement of bab‹çab (“prairies”) was located in the vicinity of the present-day Belltown neighborhood (Hilbert et al. 2001:60–64; Thrush 2007:228–229).

The settlement of íilíul (“Tucked Away Inside”) included two large longhouses measuring 60 by 120 feet and a larger potlatch house along the north shore of Salmon Bay. It was inhabited by the Shilshoolabsh, or Shilshole, people, who continued living there until it was destroyed during the construction of the Hiram M. Chittenden Locks in the 1910s (Hilbert et al. 2001:45–46; Thrush 2007:222-223). An archaeologically well-documented settlement at West Point, paß‹ca¿•u (“Brush Spread on the Water”) was used in the nineteenth century by Duwamish peoples displaced from elsewhere in the area (Thrush 2007:226). Situated along the north shore of Elliott Bay before the lowering of Lake Washington in 1916, the settlement of s¿uw•¿ (“Little Canoe Channel”) included up to five longhouses and an extensive fishing weir at the mouth of Ravenna Creek (Hilbert et al. 2001:78; Thrush 2007:251). The settlement of dù½õb¢d (“Silenced Place”), at the mouth of Thornton Creek along the west shore of Lake Washington, included at least one longhouse (Thrush 2007:254).

The City of Seattle’s namesake is the respected leader siʔał. The first ləliʔaʔkʷbixʷ (non-Indigenous colonizers) built this young village upon the ancient inter-Tribal trade, commercial, cultural, and governmental hub of the Northwest Coast, dᶻidᶻəlaĺič. The connection the ʔaciłtalbixʷ (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, since time immemorial (Spiry, Martin, and Moses 2024).

Non-Indigenous Settlement Context

Early Non-Indigenous Settlement

Non-Indigenous peoples began visiting the Puget Sound Region in 1792 when George Vancouver and his crew explored the area. Within the next 100 years, Native populations plummeted due to repeated outbreaks of introduced diseases such as smallpox, influenza, and typhoid fever (Boyd 1990; Suttles and Lane 1990). The Treaty of Washington in 1852 conveyed the territory to the United States, and the Donation Land Claim Act drew settlers into land occupied by the Duwamish and their neighbors. In 1855, members of the Duwamish and neighboring Puget Sound tribes signed the Treaty of Point Elliott, which provided for the removal of Tribal members to reservations, including the Port Madison Reservation (Suquamish/Fort Kitsap), Lummi, Swinomish, and Tulalip. Some Duwamish people continued to live in and around Seattle, maintaining friendly relations, working for, and trading with incoming settlers. Many others, meanwhile, relocated to the Port Madison Reservation, but due to undesirable conditions were compelled to leave. Many then attempted to return to their ancestral lands, and a few were able to claim or purchase land (Ruby and Brown 1992; Thrush 2007).

As non-Indigenous settlement increased, Tribal lands and fishing rights continued to be eroded through the late 1800s and 1900s. Non-Indigenous settlers purchased lands that were used by Natives as fishing areas and prevented access, and, as the commercial fishing industry grew, the State applied fishing regulations and fees not only to the industry but to the Tribes. These and other such actions culminated in the late 1900s, in a series of lawsuits and court cases that upheld certain treaty rights (Dougherty 2020; Marino 1990; Ruby and Brown 1992). The federally recognized Muckleshoot, Snoqualmie, Suquamish, and Tulalip Tribes are the descendant Tribes that represent the various tribes and bands with territorial interests in Seattle, that were signers of the Point Elliott Treaty. The Duwamish Tribe is not currently federally recognized but continues to fight for this distinction.

It was in 1851 that the first non-Indigenous settlers arrived in the Seattle area. In the Duwamish area (Area 7), a party that included Luther Collins, Jacob Maple, Samuel Maple, and Henry Van Asselt filed claims along the Duwamish River on lands that now make up Georgetown. Farming became the main industry in this area (Wilma 2001a).

Soon after, in what is now downtown Seattle (Area 4), the Denny Party arrived. They included Arthur A. Denny and his brother David T., John N. Low, Carson D. Boren, William N. Bell, Charles C. Terry and his brother Lee, and their families. These early settlers moved to the east shore of Elliott Bay in 1852, to take advantage of the deep-water harbor, and filed donation land claims. They encouraged additional settlement by adjusting their land claims to accommodate new arrivals, such as sawmill owner, Henry L. Yesler, and filed the first plat for the town of Seattle (Denny 1888:7–13, 16–17; Fiset 2001a; U.S. Surveyor General [USSG] 1856, 1863).

Some of these earliest non-Indigenous settlers in what is now the southern end of the Queen Anne/Magnolia area (Area 3), included members of the Denny party, David T. Denny and his

wife, Louisa Boren Denny, who filed a donation land claim for just over 320 acres. Their neighbor to the north, Thomas Mercer, filed for a land claim on 160 acres (General Land Office [GLO] 1866a, 1866b). Dr. Henry Smith, with his wife, mother, and sister, and Erasmus M. Smithers settled in what is now the Interbay area of the Queen Anne/Magnolia area, establishing small farms, while David Standler settled on land to the north along Salmon Bay, and John Ross and William A. Strickler (alternately spelled Sticken) settled to the northeast near the north end of Lake Union, all filing land claims (GLO 1866c, 1871a, 1871b, 1872, 1877; Wilma 2001b; USSG 1871).

The earliest land claims in the NW Seattle area (Area 1) were Edmund Carr, who filed a donation land claim for 137 acres at the southwestern end of what is now the Ballard neighborhood and Ira W. Utter, who filed a land claim for 156.60 acres at the north shore of Salmon Bay (GLO 1871c, 1871d). In the Capitol Hill/Central District (Area 5), John H. Nagel (also spelled Nagle) filed a land claim for 161 acres south of present-day Volunteer Park, while Henry L. Yesler's 185.74-acre claim with his wife Sarah B. Yesler was in what is now the Central District, centered on the present-day Garfield Playfield (GLO 1866d, 1871e).

Two land claims in the northern end of the SE Seattle area (Area 8), were filed by John C. Holgate and Edward Hanford and his wife, Abigail Jane (Holgate) Hanford. Each was for 320 acres in what is now the Beacon Hill neighborhood (GLO 1867, 1871f; Lange 2000a).

More settlers followed in the 1850s, made claims, and supported themselves by farming and logging, or by establishing small retail or commercial enterprises (Wilma 2001a). Most of these earliest farms in the Seattle area were small family operations that raised some fruit, vegetables (potatoes), and a few chickens or livestock; these farms were used primarily to sustain the family, not for resale. In the Duwamish, some farmers grew hops and hired local Indigenous peoples to work the harvest (Gregory 2009; Wilma 2001c). Logging, which began with local men working with oxen and small timber mills, became the primary industry of this period (Caldbick 2014; Denny 1888:16–22; Fiset 2001a). Over time, larger mills were constructed in the area and the industry offered steady employment for incoming settlers, and much of the Seattle neighborhoods were logged off (Sanborn Map Co. 1884, 1888, 1893).

Also in 1852, King County was established, with Seattle as the county seat, and the following year, Congress split the Washington Territory out of Oregon Territory (Crowley 2006).

Other non-Indigenous settlers arrived from the east and opened small shops in the nascent city, providing services to other settlers. At least two of these non-Indigenous settlers were African Americans. One was Manuel Lopez, who came to Seattle in 1852 and established a barber shop, and another was William Grose (or Groce or Gross) who arrived in 1859 and opened a restaurant (Long 2006; Raftery 2021). For more information about Grose, see the Capitol Hill/Central District (Area 5).

Around 1855, the U.S. Navy anchored the sloop *Decatur* just offshore in Puget Sound to defend the settlers who feared attacks from Native peoples. The settlers also built blockhouses and hosted militias in response to skirmishes with frustrated Natives, dissatisfied with the

reservations. After the Battle of Seattle in 1856, the government established the Muckleshoot Reservation southeast of Seattle on the White River in 1857 (Crowley and Wilma 2006; Williams 2015; Muckleshoot Indian Tribe 2023). In 1861, Seattle won the right to build the Territorial University. The school would develop into the University of Washington (UW) (Crowley 2006; Williams 2015). In 1865, the Board of Trustees of the Town of Seattle passed an ordinance banning Native Americans from living in Seattle, and although the law was not readopted when Seattle was reincorporated in 1869, discrimination against Native Americans continued. By that time, the population of settlers in Seattle had risen to 302, and many of them were working to grow the town into something more substantial. While most of the early industry and commercial activity had grown along the eastern shore of Elliott Bay, sparse residential and family farms were beginning to pop up in the areas surrounding Seattle's central core (Bagley 1929; Ott 2014).

Development of Seattle

In the 1870s, the discovery of large deposits of coal near present-day Newcastle and Renton created a need for transportation to Seattle docks on Elliott Bay. Initially, the coal was transported on barges across Lake Washington, then unloaded to wagons and transported overland to Lake Union, where it would be loaded back onto barges and shipped southwest across the lake. Then the coal was once again unloaded onto wagons for the final leg of the route to Elliott Bay. In an attempt to simplify this onerous shipping system, a narrow-gauge rail line was constructed in 1872 between Lake Union's south shore and the coal dock on Elliott Bay. Five short years later, the line was abandoned as the Seattle and Walla Walla Railroad (S&WW) was constructed by the enterprising locals in Seattle from Elliott Bay south to the coal fields near Renton and then north to those near present-day Newcastle (Link 2004:3; MacIntosh and Crowley 1999).

The S&WW was incorporated as a response to Northern Pacific Railroad's choice for its western terminus. In the early 1870s, Northern Pacific Railroad representatives toured the Puget Sound area looking at locations for their transcontinental line west coast terminus. Seattle, Tacoma, and other towns made substantial offers to the railroad company in hopes of enticing them to choose their town. In 1873, the railroad selected Commencement Bay near Tacoma. Angered, Seattle's leaders and residents responded by forming the S&WW. When complete, the S&WW line carried vast quantities of coal from the mining region in southern King County to Seattle for export. In 1880, successful railroad magnate, Henry Villard, purchased the S&WW and renamed it the Columbia & Puget Sound Railroad (C&PS). In 1884, the Northern Pacific Railroad built a spur line to Seattle, and the following year, in 1885, the Seattle, Lake Shore & Eastern (SLS&E) built a rail line from Smith Cove to Newcastle and Issaquah, spurring additional growth (Chesley 2009; MacIntosh and Wilma 1999; Lange 2000b; Williams 2013).

Seattle's economy boomed with shipping, railroads, timber extraction and milling, coal mining and shipping, commercial and industrial manufacturing such as iron works, and service industry support. At this time, Seattle's economy was closely tied to other Pacific ports, especially those in California. At various times, a substantial percentage of lumber shipped from

Seattle went to San Francisco to aid in its reconstruction from catastrophic fires and, later, the 1906 earthquake that was accompanied by a fire that destroyed some 25,000 buildings. The close connection between these ports can be seen in the creation of Ballast Island, an artificial landform on the Seattle waterfront, which was largely made up of rock mined from outcrops in San Francisco and dumped in Elliott Harbor to make space for the Seattle products shipped in return sailings. Ballast Island is a traditional cultural property (TCP) that is important to the area's Tribes (Curti, et al. 2020). This rise in production created jobs and encouraged population growth (Fiset 2001a).

In response to Seattle's growth, the pace of construction in the surrounding neighborhoods began accelerating in the late 1880s and early 1890s. Over time, additional sawmills were constructed, and existing mills were enlarged throughout the area with the addition of planing mills, molding cutters, and other specialty manufacture. The industry offered steady employment for incoming settlers and much of the Seattle neighborhoods were logged off (Sanborn Map Co. 1884, 1888, 1893). Mills and other commercial ventures were built on the available lands, manufacturing companies expanded, and support services such as restaurants, hotels, breweries, laundries, creameries, soap works, and other similar enterprises were established throughout the neighborhoods. In addition, houses were constructed to accommodate increasing numbers of employees, both management and labor, and business owners (Fiset 2001a; Sanborn Map Co. 1884, 1888, 1893).

At first many people in Seattle welcomed the city's Chinese residents for their labor. The Chinese had built many of Seattle's streets and railroads, operated shops and businesses, worked in mills, logging camps, mining, and the fishing industry, and were domestic workers. By the 1880s, they faced increased discrimination and abuse, as other laborers perceived greater competition for jobs. Following the passage of the Federal Chinese Exclusion Act in 1882, hostilities continued to rise against the area's remaining Chinese inhabitants. Many Chinese living in Seattle lost jobs and many left town fearing violence. Then, in 1886 an angry crowd of Seattle residents swarmed into Chinatown, forced more than 300 of the city's Chinese population to leave the city via ship, and destroyed many Chinese homes. The governor declared martial law and imposed a curfew, which was enforced by patrolling military troops. Later, crowds forced an additional 110 Chinese to leave town and many more left on their own. By the time Martial law was rescinded, fewer than 30 Chinese residents remained (Dougherty 2013; Riddle 2014). The Chinese Exclusion Act was extended for 10 years in 1892, made permanent in 1902, and was finally repealed in 1943 (National Archives and Records Administration [NARA] 2023).

Cable cars and electric streetcars crisscrossed Seattle's neighborhoods, ferries transported passengers across Lake Union, and systems of staircases, first constructed of wood and later of concrete, were built for ease of travel over the area's hilly topography (Fiset 2001a; Thompson and Marr 2013). According to Sanborn maps, in 1884 the population of Seattle was 7,000 persons; this number more than doubled by 1888 to 16,000 (Sanborn Map Co. 1884, 1888).

Like many cities in the United States, Seattle was devastated by fire. The Great Seattle Fire occurred in 1889 and leveled the city's 18-block waterfront and 40 blocks of the city center. The fire destroyed wood-frame buildings and structures, and those constructed of brick and stone, including wharves, piers, depots, mills, warehouses, businesses, offices, banks, stores, hotels, apartment buildings, and some residences. Rebuilding began almost immediately. The City widened some streets and raised others, implemented a new building code, banned wood buildings in the fire zone, and established a city water works (Caldbick 2020a, 2020b). Many of Seattle's sawmills that had been destroyed in the fire relocated to the north side of Salmon Bay, to what is now Ballard (Wilma 2001b).

After the fire, in 1892, the Great Northern Railway Company's president, James J. Hill, constructed his line to Seattle that crossed Salmon Bay and Interbay to Seattle, and built docks, a grain terminal, grain elevator and warehouse at Smith Cove to facilitate maritime commerce with the Far East. Other private docks and warehouses were also built in the area (McClary 2013). In 1895, the UW relocated from the downtown area to the Brooklyn neighborhood in NE Seattle (Crowley 2006). For more information about the UW, see NE Seattle (Area 2).

The discovery of gold in 1896 in the Klondike region of the Yukon Territory, in western Canada, impacted Seattle's development with long-lasting economic benefits. Seattle was uniquely positioned as the jumping-off point for thousands of miners headed to the gold fields, and as a supplier to those miners with the provisions they needed for the trek. The Klondike gold rush triggered a great need for Seattle's shipbuilders, merchants, steamships, and railroads, and in return, millions of dollars flooded into Seattle's economy and were used by individuals to open shops and stores, create transportation services, and construct buildings, and by the municipality to fund infrastructure improvements such as roads, sewer and water systems, and ports. The Klondike gold rush cemented Seattle's reputation as a successful port city and hub for shipbuilding, transportation, and business (Tate 2004).

Around the turn of the twentieth century, construction in Seattle's neighborhoods included educational buildings, religious facilities, and multi-unit apartment buildings in support of the rapidly expanding population (Baist 1905; Fiset 2001a). Additionally, religious organizations, commercial enterprises, and industrial operations began upgrading their wood-frame buildings with more substantial masonry versions in the wake of the fire (Link 2004:6). Industry boomed as well, spreading north and south of Seattle to more accommodating topography and expansive rail and waterway transportation systems (Langloe 1946). Private wharves, piers, warehouses, and mills were built south of the city, many were linked to the Northern Pacific lines to handle freight shipped into and out of Seattle. It was around 1900 that Seattle's Chinese population finally recovered, and Chinatown began to prosper once again (Dougherty 2013; Sanborn Map Co. 1905, 1928; Wilma 2001a).

After the turn of the twentieth century, the City of Seattle embraced the progressive era with a series of planned projects, including annexing a series of suburban towns, hiring the famed Olmsted Brothers landscape architects to create plans for parks, scenic boulevards, and playgrounds, built utilities and schools in the outlying neighborhoods, and began paving roads.

(Crowley 2006). Although Seattle established a park commission in 1890 and had purchased parks over the years, the commission was unable to create a citywide parks plan. In 1903, Seattle hired the Olmsted Brothers Landscape Architects firm to develop plans for Seattle parks. That same year, John Charles Olmsted, his assistant Percy Jones, and park commissioners toured and surveyed the city for a month. When Olmsted submitted his report to the City Council, it laid out a citywide system of parks interconnected by parkways and boulevards and included playgrounds and meadows. The report stressed the importance of purchasing land across the city that had access to water and wooded areas, and that contains important views of mountains, water, and forests. The report recommended certain properties to purchase and included design recommendations for the city's existing parks. The plan was approved by the City Council in November 1903. Olmsted continued to advise the city over the years on its development of the parks system, and also worked with the UW board of regents on improvements for the campus (Beckner and Perrin 2016; Williams 1999). In 2016, *Seattle's Olmsted Parks and Boulevards (1903–68)* was listed in the NRHP under a Multiple Property Documentation form (Beckner and Perrin 2016).

By 1904, Seattle's increasingly diverse population swelled to over 150,000. The city was ethnically diverse, with established Chinese, Japanese, Italian, and Jewish communities just outside the downtown area. Between 1905 and 1910, Seattle annexed many of the small towns and neighborhoods north and south of the city center, nearly tripling the size of the city. Many of these communities had petitioned for annexation due to their inability to keep up with infrastructure and safety concerns. Progressive city leaders funded projects for public benefit including paving roads, constructing utilities, and building schools. They established the Pike Place Public Market in 1907 and in 1908 again hired the Olmsted Brothers for a report on the newly annexed areas of the city (Beckner and Perrin 2016; City of Seattle 2023a; Crowley 2006; Sanborn Map Co. 1905; Williams 1999; Wilma 2001a).

In 1909, Seattle hosted a world's fair on the campus of the UW in the Brooklyn neighborhood. The 250-acre fairgrounds was designed by the Olmsted Brothers. The fair's planners requested the Olmsted Brothers firm develop landscaping plans for the fair's 250-acre grounds on the UW campus. Seattle residents celebrated the city's accomplishments with nearly four million visitors at the Alaska-Yukon-Pacific Exposition (Beckner and Perrin 2016; Williams 1999).

The onset of the 1910s saw big changes for the now booming Seattle. Between 1912 and 1917, the U.S. Army Corps of Engineers (USACE) constructed a canal between Puget Sound and Lake Washington following Ross Creek, which had been widened ca. 1885 for use as a log canal (Chrzastowski 1983:6). The Hiram M. Chittenden/Ballard Locks was completed in 1917, opening a major shipping route that connected Lake Washington, Lake Union, and Salmon Bay Waterway to Puget Sound. The project was funded by King County and the federal government. Simultaneous to the construction of the Canal, the City of Seattle completed bridge construction, street grading, and built the Third Avenue West Tunnel to provide a route for utilities to pass under the new Canal (Fiset 2001a; Walton Potter 1977:12).

Other large projects during that time included the flattening of Denny Hill and streets north of downtown Seattle, known as regrades, which allowed for easier transportation routes in and out of the city (Link 2004:8). Much of the earth removed in the regrades was used to fill in wetlands and tidal flats. In 1912, the Great Northern docks at Smith Cove were sold to the newly created Port of Seattle for construction of a deep-sea terminal. The Port's comprehensive plan also included the construction of Fisherman's Terminal on Salmon Bay, the Bell Street Pier, wharves and warehouses on the East Waterway pier and a second pier on the East Waterway, a public wharf and warehouse at the end of Bell Street, a grain elevator at Hanford Street, and a new ferry service on Lake Washington (Oldham 2020).

Additionally, man-made alterations along the Duwamish River beginning in 1913—rerouting, straightening, and channelizing the river, and draining, dredging, and filling tidelands—and extensive logging, created land for agriculture and industry. These actions destroyed the Duwamish Tribe's traditional uses of the river to fish, gather and hunt. The dredged material was used to construct Harbor Island, which split the mouth of the river into two channels. The Port of Seattle would later plan extensive terminals on Harbor Island (Oldham 2020; Updegrave 2016; Wilma 2001c). This industrial growth created additional employment opportunities and more residences and apartment buildings were constructed in Seattle's neighborhoods to house the influx of needed workers. Seattle's population rose to 456,000 by 1928 (Crowley 2006; Sanborn Map Co. 1905, 1928).

In 1923, Seattle City Council passed the city's first zoning ordinance. Prior to its passage, the city had relied on the irregular issuance and amendment of Building Ordinances, that were largely building codes. These building ordinances defined building terminology, specified construction materials and methods by building class, described the role of the building inspector and Fire Marshall, laid out permitting procedures, and spelled out mandatory requirements for each class of building (fireproof, mill, masonry, and frame buildings), and type of building (residential, business, commercial, manufacturing, and industrial) (Seattle Building Code Commission 1909:1–10, 11–94). Conforming to these building ordinances, developers constructed a mix of single- and multi-family residences alongside boarding and lodging houses, and small commercial strips outside of the downtown core in neighborhoods across the city (Eliason 2018).

In January 1920, the city council passed Ordinance 40407, which established the City Zoning Commission and defined its role. The first members of the commission consisted of the City Engineer, Superintendent of Buildings, a Park Trustee, and six members appointed by the Mayor. The commission's first job was to divide the city into zones or districts and write ordinances that would "specify the uses to which property in each district may be devoted" (Seattle City Council 1920:2; Seattle Zoning Commission 1920a).

Through 1920, the commission heard testimony on neighborhood concerns and gathered information about zoning. Residents requested the commission address issues caused by meat packing plants and stockyards adjacent to residential neighborhoods, and tackle parking issues. The commission collected zoning data from cities around the country, including Portland, St.

Louis, Cincinnati, Memphis, New York, Washington D.C., and others (Seattle Zoning Commission 1920a, 1920b, 1920c). In January the following year, the commission hired Harland Bartholomew a "zoning expert" and city planning engineer from St. Louis, Missouri, and a public meeting was held in February to introduce Bartholomew and discuss city zoning (Seattle Zoning Commission 1921a).

Bartholomew suggested that Seattle be divided into five districts by use and recommended that the commission consider building height, building area per parcel, and density of occupancy within each of the districts (Seattle Zoning Commission 1921a). Working with the Building Code Commission, the zoning commission developed a proposed zoning report, presented the report to the City Council, and held public meetings to share each neighborhood's proposed zoning (Seattle Zoning Commission 1921b). Throughout 1922, the commission received petitions from numerous university, hospital, ecclesiastic, and industry representatives, improvement clubs, property owners, neighborhood groups, and business owners requesting changes to zoning that affected them; some of these were approved by the commission and some were denied (Seattle Zoning Commission 1922a, 1922b).

In January 1923, the zoning commission approved the draft zoning ordinance and presented it to the City Council. During the months that followed, the commission continued to review petitions for changes and make amendments to the draft, which they forwarded to the City Council (Seattle Zoning Commission 1923). In June 1923, the Council signed the zoning ordinance (Ordinance 45382), presented it to the mayor who approved it that same month (Seattle City Council 1923).

The ordinance divided the city into six different "use districts," which included the First Residence, Second Residence, Business, Commercial, Manufacturing, and Industrial Districts. Permitted in the First Residence Districts were single family dwellings, schools, churches, parks, playgrounds, art galleries, libraries, private conservatories, educational housing, and railroad stations. In the Second Residence Districts, zoning allowed for all First Residence uses plus dwellings, flats, apartments, boarding and lodging houses, hotels, clubs or fraternal organizations, and medical and philanthropic institutions. Within the Business Districts, both First and Second Residence uses were permitted plus stores, offices, banks, restaurants, service stations, police or fire stations, printing office, telephone/telegraph office, theaters, dance halls, skating rinks, retail trades or shops, automobile salesrooms and garages, hand laundries, and the like. In Commercial Districts, the zoning ordinance permitted all of the First and Second Residence, and Business uses, and allowed for any trade or industry except for 75 specific manufacturing industries that were enumerated in the ordinance. In the Manufacturing Districts, the ordinance allowed all of the First Residence, Second Residence, Business, and Commercial uses except for a list of 16 industries. Most of the excepted industries were listed as "objectionable" due to "the emission of dangerous, unwholesome, foul, nauseous or offensive gases, odors or fumes" (Seattle City Council 1923). Finally, in the Industrial Districts, all lawful uses were permitted under the zoning ordinance. Between its passage in 1923 and its repeal and replacement in 1957, the zoning ordinance was amended over 600 times (Seattle City Clerk 2023).

In many new neighborhood subdivisions, discriminatory racial restrictions were entered into the deeds. These restrictions that prohibited the use, sale, or lease of a property to persons of color and other such discriminatory classifications became common after a 1926 U.S. Supreme Court case, *Corrigan et al. v. Buckley*, ruled that such covenants were not prohibited by law. In 1948, in *Shelley v. Kraemer*, the court reversed its earlier opinion and found that such racial deed restrictions violated the Equal Protection Clause of the Fourteenth Amendment. However, it remained legal to discriminate on the basis of race or ethnicity in the rental or sale of housing until 1968, when Congress passed the Housing Rights Act. Although now illegal, such racially restrictive language remains in many deeds in many of Seattle's neighborhoods (LII 2021, 2023; University of Washington [UW] 2020a). For more specific information about racially restrictive covenants in Seattle's neighborhoods, see each of the analysis areas below.

Like most of the United States, the Great Depression hit Seattle hard, as the area's industries faltered, jobs were lost, and subsequently, the population fell. The arrival of World War II and the corresponding growth in war-supporting industries slowed the decline. In 1942, all the Japanese residents on the West Coast—including over 7,000 Japanese Americans in Seattle—were forcibly removed and incarcerated for the duration of World War II by President Roosevelt's executive order 9066. After the war, many never returned to the area, many lost their businesses and homes, and over time, many of their former farmlands were developed (Studio TJP 2021).

During this time, the city's earliest residential neighborhoods were in flux due to pressure of commercial and industrial interests. Additionally, the 1949 earthquake, which damaged numerous buildings, hastened the shift away from mixed residential and commercial neighborhoods towards those with a mix of commercial and industrial, as city officials sought to protect people from falling debris of unreinforced masonry buildings. The gradual rebuilding began in the late 1950s, in part stimulated by the rezoning of some of Seattle's neighborhoods to general manufacturing (Fiset 2001a; Link 2004:14; Thompson and Marr 2013).

In June 1957, the 1923 zoning ordinance was repealed and replaced with Comprehensive Zoning Ordinance 86300 (Seattle City Council 1957). One of the biggest zoning changes implemented under this ordinance included the classification of eight residential zones (R zones), which allowed for a mix of housing types and population densities plus some essential public services' facilities. These comprised three categories of single-family residence zones to "promote and protect various densities and uniformity of development within each" zone; two classes of duplex residence zones; and two classes of multiple family residence zones (Seattle City Council 1957). The ordinance also included three categories of shopping and business zones (B zones); two classes of commercial zones (C zones); and three categories of manufacturing zones (M, IG, and IH zones) (Seattle City Council 1957). The City Council amended Ordinance 86300 over 22,000 times before 1980 (Seattle City Clerk 2023).

As in many parts of the country, in 1957, the city implemented an Urban Renewal Program (Ordinance 86767) that altered the character of some of Seattle's neighborhoods. Defining areas as "blighted" due to what was perceived as deteriorated housing or unsanitary living

conditions, the Planning Commission sought to use eminent domain to clear and redevelop areas of the city (City of Seattle 2023b). These projects were financed by federal funds authorized under the Washington State's Urban Renewal Law that passed in 1957. Even though the city found that these actions would unequally displace more persons of color, the plan moved forward, touting the benefits of eradicating blight and revitalizing communities. The city found nearly 1,400 acres of the city met the various classifications of blight and would need some form of urban renewal as treatment. By mid-1968, over 1,000 structures had been demolished due to "code noncompliance" (City of Seattle 2023c). Public hearings found residents in support of and in opposition to the program, and by 1974, the Federal Urban Renewal program was ended. In 1984, the City reported that the program failed to meet many objectives and in 2021, the City Council apologized, condemned the displacement of persons of color caused by the program, and directed city departments to make amends for the injustices caused by the program (City of Seattle 2023b).

Years in the planning, work on I-5 through Washington began in 1959. The freeway aligned north–south along the east side of Eastlake Avenue E, cutting many neighborhoods in half, disrupting traffic patterns and routes, and introducing visual and auditory impacts. Much of I-5 through Seattle was completed in 1967, but the entire I-5 project was completed in 1969 (Dougherty 2010).

While not targeted by the Urban Renewal program, some of Seattle's neighborhoods such as Queen Anne pushed back against zoning changes in the 1960s–1970s, as they sought to protect their neighborhood character and historic buildings. In 1968 and 1970, voters approved a series of capital improvement bonds initiatives put forward by the Forward Thrust Committee, that included funding for a multipurpose stadium (Kingdome), historic preservation, arterial highways, neighborhood improvements, and parks and recreation, among others. In 1971, the Washington legislature created the Washington Heritage Register, and in 1973, the city passed a Landmarks Preservation Ordinance, establishing the Seattle Landmark designation (Williams and Miller 2015). In 1973, the City passed an ordinance that established the International Special Review District (ISRD) and ISRD Board, to "promote, preserve, and perpetuate the cultural, economic, historical, and otherwise beneficial qualities of the area" (Seattle Department of Neighborhoods 2023). The Seattle Chinatown-International Historic District, which is located within the ISRD, was listed in the NRHP in 1986 (Kreisman 1986).

In the 1970s, Seattle saw a drop in the city's population after a series of layoffs at the Boeing plant. Due to an influx of successful companies like Microsoft, Starbucks, and Costco, and research institutions at the UW, neighborhoods began to see rising populations and a corresponding growth in construction of new housing units, including mixed-use buildings along arterials but mostly single-family dwellings along residential streets (Williams and Miller 2015). In 1980, the City Council approved Ordinance 109560, which compiled and codified City ordinances that were passed on or prior to November 19, 1979, into the Official Code of The City of Seattle (Seattle City Clerk 2023). In 1984, Seattle's City Council passed an ordinance (111571) to pay reparations to five Japanese American city employees who were "terminated,

laid off, or dismissed" due to President Roosevelt's executive order 9066 during World War II (Long 2001).

By the late 1990s, the rise in high-technology and knowledge sectors brought an influx of diverse, talented workers from around the world. The city by 2010 had just over 600,000 residents and by 2020, Seattle's population had soared to 735,015 (U.S. Census Bureau 2022).

Although Seattle began as a sparsely populated region whose settlers supported nearby lumber mills, by the turn of the twentieth century, it had become the Pacific Northwest's powerhouse city with considerable commercial, transportation, industrial, and maritime industries. Seattle's Chinatown-International District is a racially diverse cultural center for Chinese Americans, Japanese Americans, and Filipino Americans, as well as others. Today the city is home to modern hi-tech, retail, commercial, and multi-family infill construction in villages. While some single-family homes and small commercial ventures make way for denser urban infill, most of the city's acres are still in low density residential use.

Development in Seattle Neighborhoods

Area 1: NW Seattle

Around 1870, David Denny purchased 160 acres in the area now known as the Licton Springs neighborhood and built a summer home there. The area was, and continues to be, an important cultural location for the Duwamish, Muckleshoot, Snoqualmie, Suquamish, Tulalip, and other Puget Sound region Tribes, and was known as líq'təd. The area contained forests, bogs, marshes, and mineral springs. The spring water contained minerals that colored the mud a coppery red. The Tribes used the red-colored mud in ceremonies and for other traditional purposes and harvested the native plants throughout the area (Remle and Howard 2019; Simpson 2021).

After the area along the shore north of Lake Union was logged around 1881, non-Indigenous people began settling there. In 1882, William Ashworth built a small cabin for his family on land he purchased from Corliss P. Stone at the northern end of Lake Union, in the area of present-day Wallingford. Also in the early 1880s, John and Mary Jane Ross moved north across the Outlet, which is what non-Indigenous settlers called the small stream that drained Lake Union into Salmon Bay, to the area now known as Ross/Fremont, where a few other settlers lived, including William and Mary Crawford. The settlers farmed and built a school for their children (Krafft 2010a; Veith 2005).

In 1883, the Lake Washington Improvement Company hired the Wa Chong Company to excavate canals connecting Salmon Bay and the Puget Sound with Lake Washington (see below Downtown/Lake Union [Area 4], for more information about the Wa Chong Company). The Wa Chong Company completed the canals in 1886, allowing for passage of shallow-draft boats and log booms through the Fremont and Montlake Cuts. That same year, David T. Denny and Judge

John P. Hoyt platted the Denny & Hoyt's Addition, which encompassed land on both sides of the Outlet (Krafft 2010a; Riddle 2014; Veith 2005).

By the late 1880s, much of the present-day neighborhoods of Northlake, Edgewater, Fremont, and Wallingford had been logged over, and the Seattle Lake Shore and Eastern Railroad (SLS&E) connected the area with Seattle. By 1890, real estate investors had platted a number of subdivisions and sold lots for residential development, lumber and shingle milling companies set up operations, the Seattle Electric Railway and Power Company had established an electric trolley service, and a fleet of steamers plied the waters of Lake Union transporting passengers and supplies (Krafft 2010a).

The present-day neighborhood of Ballard developed on the Utter lands in the early 1880s, after real estate investors from Seattle purchased the property. By 1887, the West Coast Improvement Company combined a series of neighboring tracts with the Utter property and platted the unit as Gilman Park. Most of the parcels were designated residential and commercial, but larger plots along the waterfront were allocated for industrial uses, which attracted shingle and lumber mills (Walton Potter 1976).

After the Great Fire of 1889 leveled much of downtown Seattle, investors and entrepreneurs established additional industrial, commercial, and retail operations in the burgeoning community of Fremont, including an iron works, a tannery and machine works, a hotel, hardware store, grocery, dairy, cigar stores, cafes, fraternal organizations, and a meat market. A number of residences and churches were also built during this prosperous time (Krafft 2010a).

It was in the late 1880s that a real estate developer platted 600 acres around Green Lake, built an amusement park on the northwestern shore of the lake, and worked to extend a railway line to the lake. At around the same time, a developer named Guy Phinney platted the Woodlands Estate subdivision in what became the Woodland Park neighborhood, built the Woodlands Hotel, and installed his own streetcar line to connect with Fremont (Studio TJP 2021; Veith 2005).

As growth continued and the area thrived, Ballard incorporated in 1890, while Seattle annexed Fremont, Green Lake, and much of North Seattle in 1891. Soon after annexation, Seattle established an elementary school in Fremont. In 1899, Seattle purchased and annexed the Phinney property. Shortly after the turn of the twentieth century, Fremont's street railways expanded north to Greenwood and later to Green Lake, Ballard, and east to Meridian and Wallingford, spurring residential growth with accompanying small commercial and retail centers (Krafft 2010a; Veith 2005; Walton Potter 1976).

In Ballard, by 1904 there were 15 shingle mills, iron foundries, shipyards for the fishing fleet, drop forge works, wood pipe works, and boiler works, and its population was around 10,000. Much of the residential stock constructed in Ballard during this time was worker housing around the industrial areas. That same year, Ballard received a Carnegie Library, which was listed in the NRHP in 1979 (Morrison Beals 1979; Walton Potter 1976).

In 1905, farther to the north, Theodore N. Haller purchased the land John Welch homesteaded, in what became known as the Haller Lake neighborhood. Haller then platted tracts around the lake for sale. The area, along with the neighboring community of Bitter Lake, slowly developed with a sparse population of small farms and summer cabins (Fiset 2001b).

In 1906, the Seattle Gas Light Company opened its gas manufacturing plant, originally called Lake Station, on the headland that protrudes south into Lake Union. Over the years, the plant delivered gas to Seattle, Renton, Kent, and Tukwila through 1,071 miles of pipes; the plant closed in 1956. In 1962, the site was purchased by the City of Seattle, and between 1969 and 1978, Gas Works Park, designed by Richard Haag, was developed. The park was listed in the NRHP in 2012. Also in 1906, the Seattle–Everett Interurban line was installed through Fremont, and reached Haller Lake by 1910, which contributed to another surge in population and residential housing growth. Likely hoping to see their faltering water and sewer systems upgraded, Ballard's citizens approved annexation to Seattle in 1907. In 1910, a Carnegie Library was constructed in Green Lake, which was listed in the NRHP in 1981 (Krafft 2010a; Tusa Fels and Edstrom O'Hara 2012; Vandermeer 1981a; Walton Potter 1976).

In the early 1910s, as planning was underway for the construction of the Chittenden Locks and Lake Washington Ship Canal to connect Lake Washington with Puget Sound, Seattle engineers also planned for a new bridge to cross the channel at Fremont Avenue. Completed in 1917, the Fremont Bridge, a double-leaf trunnion bascule bridge, was listed in the NRHP in 1982. The Hiram M. Chittenden Locks and Related Features of the Lake Washington Ship Canal, also completed in 1917, were listed in the NRHP in 1978 (Soderberg 1980; Walton Potter 1977).

Although discrimination limited job opportunities for people of color, in the mid- to late 1910s, the Ballard shingle mills employed some African Americans, who were recruited by James A. Roston. A former Army officer, Roston helped other Black and sometimes Filipino Seattle residents find employment in mills, as cooks for the Admiral Lines, and in other industries (Mumford 1985:30–32).

In 1919, the Lakeside Boys School opened in Haller Lake, and two years later, the area's residents established a community club. Clare E. Huntoon, who purchased 200 acres of land in the Haller Lake area, never platted her land. After her death, developers acquired the land and built commercial, educational, and cultural properties, such as the Playland amusement park at Bitter Lake (built in 1930 and demolished in 1961), Ingraham High School (built in 1959 and designated an SL in 2016), and the Jewish cemetery, Bikur Cholim Cemetery (built in 1890) on N 115th Street. The Bikur Cholim is King County's oldest Sephardic cemetery (Bikur Cholim Machzikay Hadath [BCMH] 2023; Fiset 2001b; Sundberg 2010; The Johnson Partnership [TJP] 2016).

Some first-generation Japanese immigrants—Issei—settled on farms around Green Lake. Many farmed fruit, berries, flowers, and vegetables, which they sold to wholesalers or transported for sale at Pike Place Market. Other Japanese residents operated small commercial or retail enterprises. By the mid-1930s, there were about 300 Issei living in the area. In 1942, all the Japanese residents on the West Coast were forcibly removed and incarcerated for the duration

of World War II by President Roosevelt's executive order 9066. After the war, many never returned to the area, and over time, their former farmlands were developed (Studio TJP 2021).

Throughout the 1920s and up until the onset of the Great Depression, residential development in the NW Seattle area remained strong. Most residential buildings (single family homes, duplexes, and apartments) were constructed near commercial districts and expanded outward from there, usually following streetcar lines. In the NW Seattle area, racially restrictive covenants were found in a number of residential developments. One example of such covenants was found in the Overland Park subdivision. Built by the Peoples Realty Company, the covenants covered about 990 properties. The covenant restricted the renting, leasing, or selling of the lots or buildings to African Americans or Asian Americans (UW 2020).

In 1921, a Carnegie Library was built in Fremont; the property was listed in the NRHP in 1981 (Vandermeer 1981b). Like many areas of Seattle, the depression slowed real estate development through the end of World War II, when returning soldiers caused a residential and commercial construction boom, and a transformation to an automobile driven urban form in NW Seattle (Krafft 2010a).

The 1950s saw many changes in industrial and economic activity. In 1954, the city annexed the northern end of NW Seattle out to N 145th Street, which brought improvements in infrastructure and new residential development. During this time, many lumber mills declined and closed, and industrial development shifted south of Seattle in King County, which caused commercial and waterfront areas to deteriorate in NW Seattle. In preparation for the construction of Interstate 5, WSDOT purchased and demolished numerous buildings along the proposed two-block wide route through NW and NE Seattle. (Dorpat 2001a; Fiset 2001b; Tobin and Sodt 2002; Veith 2005; Wilma 2001d).

In the 1960s, the City purchased the Licton Springs property for a city park and filled in the bathing area. Improvements in the 1970s and 1980s included the creation of a pond, construction of a comfort station, and installation of stone or concrete ring around the iron oxide spring. The area continues to be a significant Tribal sacred place for gathering, healing, and ceremony, and was designated a SL in 2019 (Remle and Howard 2019; Simpson 2021).

After many years of decline, the 1970s and 1980s brought an influx of art, social services, and community development to Fremont and Ballard, causing a resurgence of the area. During this time of change, the Seattle School District's desegregation program bussed African American students to Lincoln High School. In response to desegregation, some parents pulled their students out of integrated public schools, and Lincoln closed in 1981 due to declining enrollment. After sitting unused for nearly 40 years, the school reopened in 2019. It currently serves approximately 1,700 students. In 1976, Seattle purchased the 11-acre site of the House of the Good Shepherd and transferred the deed to Historic Seattle. The property now includes the Meridian Playground, and the building is used as a multi-purpose community center. The Good Shepherd property was listed in the NRHP in 1977 and designated a Seattle Landmark in 1981. Throughout the 1980s, new residential and mixed-use development increased in the area

(Alexander and Layman 1977; Krafft 2010a; Office of Urban Conservation 1981; Seattle Public Schools 2023; Veith 2005).

Area 2: NE Seattle

Development of the NE Seattle area closely followed the development in the NW Seattle area. In 1867, Christian and Harriet Brownfield, the earliest known non-Indigenous settlers in the NE Seattle area, filed a land claim for 174 acres, receiving their land patent in 1873. Northeast of the Brownfields claim, in the present-day Laurelhurst neighborhood, William H. Surber, Henry Nathan Jr., John Hildebrand, James and Alex Elder, Terresa Feltofer, and many others filed claims. The Brownfields and their neighbors farmed and improved their land (Rochester 2001a; Tobin and Sodt 2002). Farther to the north, in what is now the Lake City area, agricultural and residential development remained slow, with lumber mills and logging operations along the shoreline (Wilma 2001d).

Two events would open the area for settlement and development. By 1887, the SLS&E reached Union Bay and Laurelhurst, creating easier access to the area. And, in 1888, Henry Yesler purchased some of William Surber's land, established a sawmill near what is now Union Bay Boglands, and logged the surrounding area. With railroad access and cleared land, small farms and orchards developed. In 1889, William W. and Louise Beck platted tracts in the present-day Ravenna neighborhood, and James A. Moore platted tracts in what is now the Latona neighborhood. In 1891, the City of Seattle annexed the Brooklyn neighborhood (Tobin and Sodt 2002).

The biggest boon to the NE Seattle area was the relocation of the UW campus from downtown to Brooklyn in 1895. With a student enrollment of over 600 students by 1900, the UW drove development in the area. Between 1900 and 1910, all the tracts north of campus were platted and subdivided (Tobin and Sodt 2002). A number of buildings and structures on the UW campus are listed in the WHR, including Denny Hall, Parrington Hall, Bagley Hall, and Lewis Hall, all of which were listed in 1971, while the UW Faculty Center was listed in the NRHP in 2009 (DAHP 2023)

In 1900, the Seattle Golf and Country Club purchased 40 acres in Laurelhurst and luxury real estate development soon followed, with the largest waterfront lots set aside for public-use maritime facilities, such as boat launches, to attract buyers (Rochester 2001a). In 1902, the University Heights School was completed, and a wing was added in 1907. The school was listed in the NRHP in 2010 (Lengyel 2010).

In 1906, after receiving approval and funding from the Washington state legislature on their proposal for Seattle to host a world's fair in 1909, the Board of Trustees for the Alaska–Yukon–Pacific Exposition reached out to the Olmsted Brothers. They requested the firm develop landscaping plans for the fair's 250-acre grounds on the UW campus (Beckner and Perrin 2016; Williams 1999). At the exposition the buildings represented industries, states and countries, including Washington, Oregon, Alaska, Hawaii, and New York, the Philippines, Japan, and Europe, among many others, and were arranged around a central fountain and landscaped area

with views to Mount Rainier. Contemporaneous fair maps show two locations featuring the Philippines: the Philippine Building and the "Igorrote" (Igorot) Village (Cordova, et al. 2009). Located in the fair's so-called entertainment area, the village, which featured members of the Bontoc Igorot, from Northern Luzon's Cordillera mountain provinces, contained traditional huts and fenced enclosures (Cordova, et al. 2009). Also located in the entertainment section of the fair, were both a Japanese Village and a Chinese Village. The manager of the Chinese Village was a Seattle merchant, Ah King. The village pavilion showcased Chinese shops, a temple, restaurant, and a performance stage (Ho and Bronson 2023). After the fair ended, UW used many of the former buildings and structures for classrooms and other campus uses. Over time most were removed. Today only Drumheller Fountain (originally Geyser Basin), Rainier Vista, remnants of the Olmsted landscape, the curving W and E Stevens Way NE (originally Pacific Avenue), Architecture Hall (originally the Fine Arts Building), and Cunningham Hall/Alene Moris Women's Center (the Woman's Building), which was relocated to George Washington Lane NE in 2009 (Andrews 1998; Frykman 1962; Sanborn Map Company 1909; UW 2023).

By 1910, most of the residential area around the UW had been platted and the area had a thriving commercial district, influenced by the Alaska–Yukon–Pacific Exposition. Many who came to Seattle for the fair stayed to purchase homes and establish businesses. In 1910, the Brooklyn area was annexed by the City of Seattle (Dorpat 2001a;Rochester 2001a; Tobin and Sodt 2002).

In 1920, in an industrial area on the Sand Point peninsula, King County, through purchase and condemnation, obtained slightly more than 400 acres to establish an airfield. In 1926, the U.S. Navy accepted the deed and began building the Naval Air Station Seattle. The station was decommissioned in 1970, and the base is now used as a Naval air reserve station, Magnuson Park, and a National Oceanic and Atmospheric Administration (NOAA) site. Naval Air Station Seattle was listed in the NRHP in 2010 (Howard et al. 2009).

In the 1920s and 1930s, in the NE Seattle area, racially restrictive covenants were found in a number of residential developments. One example of such covenants was found in the Maple Leaf Addition to Green Lake Circle subdivision. Built by A. F. Nichols Company, the covenants covered about 720 properties. The covenant restricted the renting, leasing, or selling of the tracts or buildings to anyone "other than one of the white race" (UW 2020).

The 1950s saw shifts in development. At the northern end of the NE Seattle area, in 1950, the Northgate Mall opened. The property was the first shopping mall in the United States. The construction of the mall hastened declines in the area's small neighborhood commercial corridors. Also, in preparation for the construction of I-5, WSDOT purchased and demolished numerous buildings along the proposed two-block wide route through NE and NW Seattle. In 1953, Seattle Children's Orthopedic Hospital opened its new campus in the Laurelhurst neighborhood. In 1954, the area that includes Haller Lake neighborhood and the Lake City community were annexed by the City of Seattle (Andrews 1999; Dorpat 2001a; Fiset 2001b; Tobin and Sodt 2002; Veith 2005; Wilma 2001d).

The post-World War II period saw a boom in the student population at UW, with returning service members taking advantage of the G.I. Bill to enroll in college. During this time, the UW expanded its campus to the south and southwest. But it was the construction of I-5 that caused a massive shift in the area. The freeway divided the University District from its historic western neighbors, the Latona and Wallingford neighborhoods (Dorpat 2001a; Tobin and Sodt 2002).

By the 1960s, Children's Orthopedic Hospital had expanded as a teaching hospital. The UW Medical School pediatrics program was located in the hospital. In 1970, the hospital opened the Odessa Brown Children's Clinic in the Central District (Andrews 1999).

After years of decline, the 1970s and 1980s brought an influx of art, social services, and community development to NE Seattle. The post-war baby boom, urban flight, desegregation, and the Boeing Bust moved residents out of the city into the suburbs, where development had slowed. As development picked up, smaller, older buildings were demolished and replaced. During this time, UW continued to have high enrollment and increased its student body in the 1970s (Dorpat 2001a; Meisner and Krafft 2015; Tobin and Sodt 2002).

In 1997, the Children's Orthopedic Hospital became Children's Hospital and Regional Medical Center, was allied with a number of regional hospitals and clinics, and had expanded clinics in Bellevue, Federal Way, and Olympia (Andrews 1999).

Area 3: Queen Anne/Magnolia

Residential development on lower Queen Anne Hill began in the 1870s and boomed in the 1880s, as the early non-Indigenous settlers subdivided and sold off portions of their land holdings. Infrastructure such as private water systems and electrical power service were available in Queen Anne in the 1880s, as well as some public transportation, such as cable cars, a ferry on Lake Union, and horse-drawn trolleys. The southern portion of Queen Anne was annexed by the City in 1883 (Lentz and Sheridan 2005).

While the Queen Anne neighborhood grew rapidly due to its proximity to central Seattle, growth in Magnolia was due to the construction of the West Point Lighthouse and later, Fort Lawton. Built in 1881, the lighthouse was originally a manned station, with two lighthouse keepers' houses built just east of the lighthouse structure. The lighthouse was remote and accessible only by water until 1883 when a horse trail was built connecting it to a wagon road. In 1985, the lighthouse was automated, and in 2002, the Federal government declared it surplus. The City obtained the deed to the property, restored the structure, and incorporated the property into Discovery Park. The West Point Lighthouse was listed in the NRHP in 1977 and is a resource within the Maritime Washington National Heritage Area (MW NHA) (Anderson 2023; Williamson 1977).

Fort Lawton was established in 1898 at the westernmost tip of Magnolia Bluff. Originally, it was part of a 700-acre land donation by local landowners. As one of a series of coastal military forts, Fort Lawton was an infantry headquarters and a strategic defense for the Puget Sound Naval Shipyard at Bremerton and the Port of Seattle. Around 1901, African American soldiers were

garrisoned at Fort Lawton and helped to fight fires in national parks and forests, although some locals complained to the War Department about the presence of these troops. Army Sergeant Frank Jenkins, with his wife Rufina Clemente Jenkins, were stationed at Fort Lawton in 1909. They were the first Filipino family to homestead in Seattle. Over time, the Fort was used for National Guard training, troop processing and embarkation to the Pacific and Far East combat zones during World War II, and a German prisoner of war camp. In 1972, ownership of 391 acres of land around the fort was transferred to the City and became Discovery Park, which is now home to a visitor's center, playground, hiking trails, beach access, the West Point Lighthouse (1881), and the Daybreak Star Indian Cultural Center (1977). In 2007, additional portions of the Fort property were turned over to the City. The Fort was listed in the NRHP and designated a Seattle Landmark (Boyle and Sokol Fürész 2007; Cordova 2009; Kavanaugh 1978; Mumford 1985; Williamson 1977).

Between the 1890s and early twentieth century, the Queen Anne neighborhood blossomed. Residential infill construction followed extensive logging on the south side and the top of Queen Anne Hill. Other improvements during this time included the construction of the West Queen Anne Elementary School (listed in the NRHP in 1975), installation of a municipal sewer system, a municipal water service, the construction of the Great Northern Railway's terminal at Smith's Cove, and the addition of streetcar and trolley lines. In 1907, Charles R. Collins built the Chelsea Family Hotel on the hill across from Kinnear Park. Listed in the NRHP in 1978, the Chelsea Family Hotel is a significant example of an early twentieth century apartment house (Walton Potter 1975a; Sutermeister 1978).

Most residential growth in Magnolia occurred after 1900. In those early years, some scattered residential and commercial developments appeared in the vicinity of the Fort, butut in 1905, the neighborhood began to see additional development after a streetcar line was constructed to the area. Residences, small farms, dairies, and orchards grew up along the line. Two years later, the Magnolia area was annexed to the City (Boyle and Sheridan 2015).

The completion of the Port of Seattle in 1911 and the Chittenden/Ballard Locks and Lake Washington Ship Canal in 1917 cemented the industrial, manufacturing, and maritime use of the area in and around Interbay, Lake Union, and Salmon Bay (Boyle and Sheridan 2015; Lentz and Sheridan 2005).

By the 1920s and 1930s, the Magnolia/Queen Anne area began to see further commercial development with additional small commercial districts built at the southern end of Magnolia and residences constructed on its ridges to the east and south. In 1927, the Magnolia School was built (Boyle and Sheridan 2015). In the Queen Anne/Magnolia area, racially restrictive covenants were found in a number of residential developments. One example of such covenants was found in the 832 property deeds of the Carleton Park subdivision, which was a residential development built by Charles F. Clise in 1928. The covenant restricted the renting, leasing, or selling of the tracts or buildings to anyone of the Asian American or African American "lineage" (UW 2020).

In 1940, the build-up to World War II increased jobs and the need for housing in Magnolia, and changes in public transportation brought a bus system to the neighborhoods transitioning

away from street cars. The U.S. Navy takeover of much of Interbay brought the biggest changes to the Queen Anne/Magnolia area. The Navy filled in the tidal flats and constructed a supply depot, warehouses, barracks, and other buildings in Interbay, creating jobs and housing units, as the port sent thousands of troops to the war in the Pacific theater (Boyle and Sheridan 2015; Williams and Miller 2015). Like most parts of the city, at the end of the war, both Magnolia and Queen Anne neighborhoods saw a corresponding housing boom, with Magnolia seeing new neighborhoods develop around Fort Lawton (Boyle and Sheridan 2015; Wilma 2001b).

The Century 21 Exposition, the World's Fair of 1962, brought almost ten million attendees, and left an indelible mark on the Queen Anne neighborhood. A number of innovative, significant buildings and structures were designed for the Expo, including the Science Pavilion, Monorail, Space Needle, and the Century 21 Coliseum. The Science Pavilion was designed by Minoru Yamasaki and is today the Pacific Science Center, which was designated an SL in 2010 (Peterson 2010). The Monorail was designed by Germany's Alweg Company and was designated an SL in 2003 (Boyle 2003). The Space Needle was designed by John Graham, Jr., Victor Steinbrueck, and John Ridley and designated an SL in 1999 (Boyle 1998). The Century 21 Coliseum (designed by Paul Thiry) transitioned to a civic and multi-purpose convention and sports center and has remained an important architectural resource for Seattle. The building, now known as Climate Pledge Arena, was renovated in 1995 and listed in the NRHP in 2017 (Lazzaretto et al. 2017; Stein 2000).

Prior to the mid-1960s, Seattle's neighborhoods, commercial, and industrial enterprises discharged raw effluent into Puget Sound. In 1966, the City built the West Point Treatment Plant just east-northeast of the West Point Lighthouse. Secondary treatment tanks were installed in 1995. The plant was a necessary upgrade in infrastructure and now treats approximately 90 million gallons of wastewater per day from Seattle, Shoreline, north Lake Washington, north King County, and south Snohomish County (King County 2023; Long 2018; Wilma 2000).

In the 1970s, additional neighborhood amenities were built in the Queen Anne neighborhood. In 1972, the Queen Anne Recreation Center playfield was redeveloped, and in 1978, the City built the Queen Anne Pool. The pool was designed by Benjamin McAdoo Jr., the first African American to own an architecture firm in Seattle and the first to operate a long-term architectural practice in the state (Williams and Miller 2015).

Area 4: Downtown/Lake Union

The Denny Party, who arrived in 1852, were the first non-Indigenous settlers who landed in the area that would become Pioneer Square. The party included Arthur A. Denny and his brother David T., John N. Low, Carson D. Boren, William N. Bell, Charles C. Terry and his brother Lee, and their families. Later that year, Henry L. Yesler and David S. Maynard joined them. Yesler set up his steam-powered sawmill at the foot of what is now Yesler Way (Crowley and McRoberts 1999; Denny 1888:7–13, 16–17; Fiset 2001a).

In the hopes that the Northern Pacific Railway (NP) would choose to terminate its transcontinental line in Seattle, the inhabitants set about clearing trees, filling tidal marshes, constructing wood-frame residential and commercial buildings, blockhouses, and a wharf at the harbor. In 1861, Seattle lost the campaign to become Washington Territory's new capitol but won the right to build the Territorial University in Seattle. In the early 1860s, Bell, after returning from a sojourn in California, platted his claim into town lots. Shortly after Seattle was incorporated in 1869, the 1870 Census counted around 1,000 residents. In 1874, to the disappointment of the town, NP chose Tacoma over Seattle for its terminus (Bagley 1916; Crowley 2006; Williams 2015).

In 1868, Chun Ching Hock, who was likely Seattle's first Chinese immigrant, and his business partner, Chun Wa, opened the Wa Chong Company near the Yesler Mill. The company operated a general merchandise store and contracted Chinese laborers for jobs in Seattle and for the railroads. By the mid-1870s, around 250 Chinese settlers lived in the "Chinese quarter" or Chinatown (Kreisman 1986; Riddle 2014).

By 1878, Seattle's population had grown to about 3,000 inhabitants (Williams 2015). By the 1880s, development had spread east to the south end of Lake Union, where entrepreneurs established industries there such as sawmills, brick manufacturing, shipbuilding, tanneries, and iron works (Tusa Fels and Edstrom O'Hara 2012).

During the 1880s, two of Seattle's main industries were logging and the transportation of coal. Around Lake Union, a number of sawmills opened along its shores to process the timber harvested around the lake and a number of piers for offloading of coal (Link 2004). By 1884, the horse-drawn cars of Frank Osgood's Seattle Street Railway were operating in the downtown area. Osgood extended his line to the southern shore of Lake Union and built a wharf there for steamships ferrying passengers and supplies (Veith 2005). That same year, David Denny donated land for the first public park within the city. Although originally a cemetery, in 1884, the remains were disinterred and reinterred in Lakeview Cemetery (formerly the Washelli Cemetery), and the land became a park (Beckner and Perrin 2016; Corley 1969a).

In the 1880s, many Chinese worked in downtown Seattle. Although they faced discrimination and abuse from many in Seattle, Chinese laborers built streets and railroads, operated downtown businesses, worked in mills and the fishing industry, and were domestic workers. Following the passage of the Federal Chinese Exclusion Act in 1882, anti-Chinese sentiment continued to rise against the area's remaining Chinese inhabitants as other laborers perceived greater competition for jobs. Four years after the law passed, an angry crowd of Seattle residents swarmed into Chinatown and forced many Chinese to leave the city. Those who stayed and those who arrived later, relocated to a regraded area east of the railroad tracks, creating a new Chinatown. The Chinese established shops, businesses, social organizations, schools, hotels, and apartments there. The Chinese Exclusion Act was finally repealed in 1943. The Chinatown-International District was listed in the NRHP in 1986 (Kreisman 1986; NARA 2023; Riddle 2014).

The Japanese community also worked in Seattle's downtown. Kyuhachi Nishii was the first known Japanese resident in Seattle. After arriving in town from Oregon in 1888, he opened the Star Restaurant with his business partner, Azuma. Many other Japanese settlers worked in sawmills, canneries, shops, and on the railroads, while others took jobs as domestic help. The Japanese quarter known as Nihonmachi ("Japanese town") grew just north of Chinatown (Link 2007; Takami 1998).

The SLS&E was incorporated by a group of 13 investors comprising Thomas Burke, Daniel Gilman, James R. McDonald, T. T. Minor, John Leary, Henry L. Yesler, David T. Denny, George Kinnear, G. Morris Haller, Griffith Davies, William Cochrane, James W. Currie, and Frank Osgood. Construction began in 1887 at the depot near the waterfront with a line that ran northwest along Elliott Bay to Interbay, then north to Ballard, east to Lake Union, Ross and Fremont, Wallingford, Brooklyn (now the University District), to Union Bay, then on to Yesler, and finally to Bothell by November that same year. By 1888, the eastern branch line reached into Snohomish County and finally to the coal mines of Gilman (now Issaquah), and the northern branch extended to Arlington. In 1901, the SLS&E was acquired by the NP and became its Seattle Division (Veith 2005).

Like many cities in the late nineteenth century, Seattle was susceptible to fire. Seattle's commercial core was nearly leveled by the "Great Seattle Fire" in 1889, which destroyed 64 acres of commercial, industrial, and residential buildings and the city's wharves, piers, depots, mills, and warehouses. The fire initiated a rebuilding effort that resulted in new stone and brick buildings, the widening and regrading of streets, and a phase of infrastructure improvements such as a public water system and cable car lines across the city to the suburbs (Caldbick 2020a, 2020b; Crowley 2006; Schultze et al. 2017). By 1891, a birds-eye image of Seattle, prepared by Augustus Koch, showed development spreading from the waterfront east to the banks of Lake Washington, which were still mostly forested but beginning to fill with scattered development in the clearings (Koch 1891). By 1893, the Great Northern Railway's transcontinental line terminated in Seattle, creating more opportunities for growth and development (Crowley 2006).

In 1895, the UW campus relocated from downtown to the Brooklyn neighborhood. The city also undertook a series of regrades, beginning in 1898, to flatten Denny Hill and others north of downtown. The regrades created easy access to the Belltown, Queen Anne, and Lake Union neighborhoods (Sheridan 2007). Much of the dirt removed in the regrades was used to fill in wetlands and tidal flats, as well as the depression known as the Belltown Ravine (Link 2004:8; Thomas Street History Services [TSHS] 2006; Tobin and Sodt 2002; Williams 2015).

After the turn of the twentieth century, the City of Seattle embraced the progressive era with a series of planned projects, including annexing a series of suburban towns, hiring the famed Olmsted Brothers landscape architects to create plans for parks, scenic boulevards, and playgrounds, built utilities and schools in the outlying neighborhoods, and began paving roads. (Crowley 2006). As a part of this progressive mindset, the City Council gave James J. Hill reclaimed tidal flats for construction of the Great Northern depot. City engineer Reginald H.

Thomson objected to Hill's plans and insisted on a tunnel under the business district to reduce congestion. After the tunnel was complete in 1904, Great Northern built the King Street Station, which was finished in 1906 and was listed in the NRHP in 1969 (Corley 1969b; McClary 2002; TSHS 2006). It was city engineer Thomson who designed the east–west alignment for piers built in the 1900s along the waterfront (TSHS 2006).

Additionally, the City founded the Pike Place Public Market in 1907 (City Ordinance 16636). Located on Seattle's waterfront, the market was developed in response to widespread price gouging by wholesalers who raised the costs to consumers while minimizing payments to farmers. The market was an instant success. Shortly after the market opened, neighboring businessman Frank Goodwin constructed a large two-story building to house market stalls out of the weather. By 1909, the market was attracting over 60 farmers a day to sell their products, and each month the market drew 300,000 visitors and stimulated additional commercial development in the downtown area (City of Seattle 2022; PikePlaceMarket.org 2021). Developed as a unique public-private partnership, the Pike Place Public Market was listed in the NRHP in 2010 (Krafft 2010b).

Just prior to this booming time, the Philippines came under colonial control of the United States following the Spanish-American War of 1898. After a three-year battle, the devastating Philippine-American War ended in 1902, and many Filipinos migrated to the United States, with some coming to Seattle. Many Filipinos, who could not become citizens or own property at the time, worked installing telegraph and telephone lines and attended college (Chinn 2011; Cordova 2009; Hedden 2013).

In 1909, when the city hosted the world's fair, the Alaska–Yukon–Pacific Exposition, Seattle surpassed expectations and impressed visitors as a major port city. In preparation for the influx of visitors to the Expo, the Seattle Park Board updated the 1890s-era Pioneer Square Park with a Chief Seattle fountain, a pergola, and a comfort station. The Pioneer Square-Skid Road National Historic District and the Pioneer Building, Pergola, and Totem Pole were listed in the NRHP in 2007 and 1977, respectively (Crowley 2006; Link 2007; Pitts 1977).

The city's commercial core shifted north of pioneer Square by 1910, as industries moved south (Crowley 2006). As rents increased for Chinese Americans, they moved farther east. One such move was the Wa Chong Company, which moved operations into the East Kong Yick Building in 1910 and would remain in business there until 1953. The building reopened in 2008 as the Wing Luke Museum of the Asian Pacific American Experience (Riddle 2014).

The construction of the Chittenden Locks and Lake Washington Ship Canal in 1917 triggered an expansion of Lake Union's boat yards. Some of the boat yards repaired ocean sailing ships, as they could now enter the canal to access Lake Union, while other shipbuilders built a fleet of wooden boats for World War I. The fleet never joined the war effort (Becker 2007).

Beginning in the 1920s, automobile-related enterprises, warehouses, light manufacturing plants, and construction-related businesses were constructed in South Lake Union (Krafft and Meisner 2014). The regrades of the Downtown/Lake Union area continued into the 1920s and

1930s, including the area of Denny Park. The project lowered the park grade by over 60 feet, and it was landscaped with walkways on the diagonal and cardinal directions, and planted with lawn, shrubs, flowers, and trees. Denny Park was listed in the NRHP in 1969 (Corley 1969a).

While most of the Chinese, Filipino, and Japanese immigrants to Seattle lived in the Chinatown area and Nihonmachi, by the 1920s and 1930s, some had moved farther out from the downtown area into the Central District onto larger properties where they grew fruits and vegetables to sell at Pike Place Market (Riddle 2014; Tobin 2004a). During the Great Depression, commercial construction in the downtown area slowed and commercial enterprises in the Pioneer Square area declined, but some industries rebounded during World War II in support of the war effort (Crowley and McRoberts 1999).

In 1940, construction began on the Naval Reserve Armory at the south end of Lake Union. The building and others at the site were completed in mid-1942 and was used to train thousands of U.S. Navy sailors, range finders, ammunition handlers, welders, electrician's mates, and others. The site was decommissioned after the war and some of the buildings removed. In 1991, the property was redeveloped as Lake Union Park and maritime heritage center. The Naval Reserve Armory was listed in the NRHP in 2009 (Sokol Fürész and Boyle 2009)

During World War II, the residents of Japanese ancestry who lived in the Nihonmachi, were forcibly removed and incarcerated for the duration of the war. After the war ended, many Japanese residents never returned to the area, and many lost their businesses and homes (Kreisman 1978; Studio TJP 2021; Tobin 2004a).

Also in the 1940s, in the Downtown/Lake Union area, racially restrictive covenants were found in some residential developments. One example of such covenants was found in the Haggardts Addition subdivision. Built by Oren H. and Agnes M. Haggardt in 1946, the covenants covered about eight properties. The covenant restricted the renting, leasing, or selling of the tracts or buildings to anyone "other than one of the white or Caucasian race" except as domestic servants (UW 2020).

The post-war years allowed for some commercial and industrial growth in Seattle and led to a series of construction projects in the downtown area. The automobile-related businesses in South Lake Union expanded, and in 1947, the city passed a new zoning ordinance that rezoned most of the Cascade neighborhood and South Lake Union area for light industrial, manufacturing, and commercial use only (Krafft and Meisner 2014). The Alaska Way Viaduct project was designed to move traffic off Seattle city streets and bypass the downtown area, thus alleviating congestion. The first section opened in 1953, with the final section opening the following year (Veith 2005). Also, during this time period, work began on I-5 through Washington in 1959. The freeway bisected many neighborhoods, disrupted traffic patterns and routes, and introduced visual and auditory impacts downtown. The I-5 project was completed in 1969 (Dougherty 2010). During the 1950s, as the Cascade and South Lake Union neighborhoods shifted increasingly to commercial development, numerous residential buildings were demolished, and the neighborhoods were greatly affected by the construction of I-5 (Becker 2007).

In 1969, Pike Place Market was set to be demolished and replaced by multi-story buildings and a parking garage as an Urban Renewal project. Citizens were outraged and put forth an initiative in 1971 to create a Pike Place Market historic district and a historical commission to protect it. The initiative passed, and today the Market is celebrated as an iconic Seattle and tourist destination (City of Seattle 2022; PikePlaceMarket.org 2021).

In 1974, the 12th Avenue Bridge (1912) that links the International District to Beacon Hill was renamed in honor of Dr. Jose P. Rizal. Dr. Rizal was a nineteenth century Filipino patriot, artist, historian, and writer who was executed by the Spanish for his anti-colonial efforts on behalf of all Filipinos. After a campaign begun in 1960 by Filipino American civil rights activists Tinidad Rojo and Vic Bacho, the bridge was renamed, and in 1981, the Dr. Jose P. Rizal Park in Beacon Hill was constructed in his honor (Hedden 2013).

In 1989, voters approved a land use plan, Citizens' Alternative Plan (CAP) (Initiative 31), which established height and density limits for new construction in the downtown area. In 2006, the City altered those regulations by rezoning the downtown area to allow for greater height and density limits (City of Seattle 2023d; Wilma and Crowley 2001). In the 1990s, the downtown area underwent a period of redevelopment with revitalized stores and theaters, and increased residential and cultural development, including the building of a museum and a symphony hall (Crowley and McRoberts 1999). By the end of the twentieth century, the downtown area was booming.

Area 5: Capitol Hill/Central District

In 1869, Harvey Pike platted Union City on the isthmus between Lake Washington and Lake Union (at the northern end of present-day Montlake), reserving a 20-foot-wide strip of land for a future connecting canal between the lakes. Two years later, Pike transferred the property to the Lake Washington Canal Company, which built a tram rail for portage between the lakes. In 1875, Charles Coppin dug a well in the First Hill area that had been logged by Henry Yesler. The well became a source of drinking water for the development that followed. Also in 1875, the first plat was filed in the Central Area for the Edes & Knight's Addition (Dorpat 2001b; Veith 2005, 2009).

One of the earliest African Americans to settle in Seattle was William Grose. Before moving to Seattle, Grose enlisted in the Navy, worked as a gold miner in California, aided the western branch of the Underground Railroad, and served as a community leader. While the date of his arrival in Seattle is unclear, Grose cooked in a number of downtown restaurants before opening his own restaurant in 1876, on Yesler Way near the wharf. In 1882, Grose purchased 12 acres of land from Henry Yesler in what is now the Madison Valley area of the Central District. The following year, he built a hotel and restaurant on Yesler Wharf that catered to working men, which also housed Grose and his family. After the Great Fire in 1889 destroyed his hotel, the Grose family moved to the Central District property. The Grose house still stands at 1733 24th Avenue (Long 2006; Mumford 1985; Raftery 2021; Veith 2009).

In the 1880s, likely triggered by Grose's land purchase and construction of his home, other African Americans moved into the Central District. This influx later spurred residential development that included the construction of apartment buildings for African Americans. One such apartment building was the one built by Zechariah and Irene Francis Woodson in 1908 (Mumford 1985). Between 1919 and 1923, African American businesspeople were operating a number of commercial enterprises in the Central Area (Mumford 1985; Raftery 2021; Veith 2009).

By the mid-1880s, Seattle's leaders, such as Colonel Granville and Henrietta Haller, Morgan and Emily Carkeek, and a number of the Dennys, moved to First Hill to escape the boomtown that they had helped to create. In First Hill, along 14th Avenue, they built expansive mansions (Dorpat 2001b). The Millionaire's Row Historic District was listed in the NRHP in 2020 (Kurlander 2020). Some row houses and duplexes were also built in the area during this time period (Dorpat 2001b).

Easily accessible transportation sparked growth in commercial, residential, and institutional development in the Central District. The first of three cable car lines was installed in 1888 to First Hill, with the others completed by 1891. A commercial strip grew along Madison Street, and residential tracts expanded east of Broadway into the Cherry Hill and Squire Park neighborhoods. In 1890, King County built its courthouse at the southern end of First Hill, and by 1891, the City built three schools, Rainier, Randell/Madrona, and T. T. Minor (Dorpat 2001b).

The first Jewish services for the Chevra Bikur Cholim temple were held in 1889, in the downtown Seattle area, before moving into a building in the Central District. The temple incorporated in 1891. In 1898, the congregation built a new temple at 13th Avenue and Washington Street. By 1909, the Jewish population outgrew the temple. In 1915, the Chevra Bikur Cholim Synagogue No. 3 was completed. In the early 1960s, the congregation moved to Seward Park, merged with Congregation Machzikay Hadath in 1971, and sold Synagogue No. 3 to the City of Seattle, which repurposed the building as the Langston Hughes Performing Arts Center, in honor of the renowned poet, social activist, and leader of the Harlem Renaissance. The Langston Hughes Cultural Arts Center was designated an SL in 1982 (BCMH 2023; Michelson 2023).

The Capitol Hill/Central District contains a number of parks that were discussed in the Olmsted Brothers' reports to the City of Seattle. One of these was Volunteer Park, which is often referred to as the "centerpiece" of the Olmsted Brothers' plan for Seattle (Walton Potter 1975b). Originally purchased by the City in 1876, the land that became Volunteer Park was used as a cemetery. In 1887, the remains were disinterred and moved to an adjacent parcel to the north, and the land became Lake View Park. By 1901, the park was renamed Volunteer Park and had a greenhouse, nursery, caretaker's cottage, walking paths, lawn, picnic areas, some play equipment, and a recently constructed in-ground reservoir. In their 1903 report to the City, the Olmsted Brothers, anticipating development around the park, recommended an observation tower from which to view distant important sights and a full design plan by the firm. Their plan for Volunteer Park

included a second reservoir, bandstand, music pavilion and pergola, and a conservatory, expansive lawns, undulating walkways, and various plantings. Construction began that same year (Beckner and Perrin 2016; Walton Potter 1975b). Volunteer Park was listed in the NRHP in 1975 (Walton Potter 1975b). In 1932, the Seattle Art Museum was constructed in Volunteer Park at the former location of the pavilion. The Art Moderne building was completed and opened in 1933. In 1994, the museum was renamed the Seattle Asian Art Museum, and in 2016, listed in the NRHP (Boyle 2016; Seattle Art Museum [SAM] 2023).

In the 1920s and 1930s, in the Capitol Hill/Central District area, racially restrictive covenants were found in a number of residential developments. One example of such racially restrictive covenants was found in 958 property deeds of the Capitol Hill subdivision, which was one of the largest subdivisions in the Capitol Hill/Central District (Area 5). Developed by the Capitol Hill Community Club in 1927 or 1928, this covenant was included in the deeds, restricting the sale, conveyance, lease, rent, or gift by the property owner or their "heirs and assigns," to anyone of African American heritage (UW 2020).

While most early Japanese immigrants originally settled in what is now known as the International District, in the 1920s and 1930s, many Japanese Americans moved out of the city into the Central District and Beacon Hill, as they found fewer racially restrictive covenants and more affordable housing. One of the most culturally important buildings in the community is the Japanese Language School at 1414 S Weller Street in the Atlantic neighborhood, just east of the Chinatown-International District. The school was established in 1902 and moved into its new building in 1913. The Japanese Language School (Nihon Go Gakko) was listed in the NRHP in 1982 (Dubrow 2002; Tobin 2004a).

In 1931, Harborview Hospital was built on the site of the former King County Courthouse, and a medical zone has been built up around it over time (Dorpat 2001b).

In 1959, work began on I-5 through Washington. The freeway bisected many neighborhoods, disrupted traffic patterns and routes, and introduced visual and auditory impacts downtown. The I-5 project was completed in 1969 (Dougherty 2010). During the 1950s, as the Cascade and South Lake Union neighborhoods shifted increasingly to commercial development, numerous residential buildings were demolished, and the neighborhoods were greatly affected by the construction of I-5 (Becker 2007).

In 1974, the 12th Avenue Bridge (1912) that links the International District to Beacon Hill was renamed in honor of Dr. Jose P. Rizal. Dr. Rizal was a nineteenth century Filipino patriot, artist, historian, and writer who was executed by the Spanish for his anti-colonial efforts on behalf of all Filipinos. After a campaign begun in 1960 by Filipino American civil rights activists Tinidad Rojo and Vic Bacho, the bridge was renamed, and in 1981, the Dr. Jose P. Rizal Park was constructed in his honor (Hedden 2013).

Area 6: West Seattle

Shortly after the Denny Party arrived at Alki Point in 1851, most of them moved to the east shore of Elliott Bay to escape the grueling spring storms. Only one settler, Charles C. Terry, remained, and he platted the town of Alki in 1853, and opened a general store, sawmill, and post office. Three years later, Terry traded his land to David S. Maynard for land downtown, and left Alki behind. In 1868, Maynard sold the land to Hans M. Hanson, when he found it could not support farming (Corley 1969c; Sherrard 2016; Tate 2001).

By the late 1870s, a number of industries were established along what is now Harbor Avenue at Elliott Bay, including a salmon cannery, sawmill, and shipbuilders. Industrial workers lived in the mill town of Freeport (now Delridge), which provided housing and other services (City of Seattle 2023e; Tate 2001).

During the 1880s and 1890s, the West Seattle area began to see residential and commercial development. In 1885, the West Seattle Land & Improvement Company (WSL&IC) purchased most of the land in the Admiral district, replatted it, and in 1888, the company developed a residential area they called "West Seattle" (City of Seattle 2023e; Tate 2001). The WSL&IC made transportation and other improvements to the area. They operated a ferry that carried passengers and supplies to and from Seattle and ran a cable car line up the hill into town. In 1898, the cable car ceased operation. In response, the City of West Seattle established a municipal streetcar system, which was operational by 1905. The City operated the streetcars for about a year, then sold the system to the Seattle Electric Company. They expanded the system to the south into a sparsely populated area of the peninsula, sparking a real estate boom (City of Seattle 2023e; Tate 2001).

Around 1895, the U.S. Army Corps of Engineers started to dredge the Duwamish River, which spurred additional industrial development in the area. The dredged material was dumped near the mouth of the river, creating Harbor Island. By this time, a business district was thriving near the ferry dock and the industrial area along the northeast shore (City of Seattle 2023e; Tate 2001; Wilma 2001c). Also, around this time, the NP constructed a trestle bridge to carry the rail line across the Duwamish River and connect to the WSL&IC ferry (Tate 2001).

In 1902, the residents of West Seattle incorporated as the City of West Seattle after the WSL&IC failed to continue making improvements. The city shared the peninsula with the unincorporated residential communities of Fauntleroy, Gatewood, Highland Park, Arbor Heights, Spring Hill, Youngstown, and Alki, which was a burgeoning summer recreation spot. Wealthy residents from Seattle began purchasing lots and building vacation homes in the area. One such buyer was William Bernard. In 1903, Bernard and his wife Gladys built their home, Fir Lodge at Alki Point, where they entertained frequently. After a few years, the Bernards sold the building, which was used over the years as a public event space, rental home, clubhouse, private residence, and finally as a restaurant by the 1950s. The Fir Lodge was listed in the NRHP in 2020 (Johnson 2020; Tate 2001).

By 1906, Alki had transformed into a summer playground and resort with residential tracts for sale along the beach and west of the point. The area boasted a small neighborhood filled with summer homes overlooking Puget Sound, a natatorium, an amusement park, bandstand, outdoor dining, swimming, boating, and other seasonal attractions. A steamship delivered passengers from Seattle to Alki Point, and a streetcar line extended into the area. Such amenities triggered additional residential and hotel development in the surrounding neighborhoods. In 1907, the City of West Seattle annexed Alki, Youngstown, and Spring Hill, and within a month, the City of Seattle annexed most of the West Seattle peninsula (City of Seattle 2023e; Sherrard 2016; Tate 2001). The area commonly known as Alki Beach Park, encompassing Alki Point and Duwamish Head, was listed in the WHR in 1969 (Corley 1969c).

Beginning in 1908, residents in the Alki area, including Ferdinand Schmitz, donated land to the City for a park, as great swaths of area forests were logged over for development. Originally named Forest Park, the 53-acre Schmitz Preserve Park contains old growth timber and nearly 2 miles of trails. In the Olmsted Brothers' 1908 report for Seattle's parks and boulevards, they recommended construction of a picnic shelter, pergola, trails, scenic water feature, and waterfall in the park (Beckner and Perrin 2016; Friends of Seattle's Olmsted Parks 2023a).

In 1911, the U.S. Lighthouse Service purchased Alki Point from Hans Hanson's son Edward (or Edmund). Although a lighthouse at the point was initially requested in 1895, Congress appropriated the funds in 1913, and the U.S. Lighthouse Service built the Alki Point Lighthouse comprising a concrete fog signal building and octagonal lighthouse. The lighthouse was originally a manned station, with two lighthouse keepers' houses built just east of the lighthouse structure. In 1984, the lighthouse was automated, and in 2002, the federal government declared it surplus. The lighthouse continues to function as a navigation aid at the present time and is managed by the U.S. Coast Guard (Anderson 2023).

Infrastructure improvements were needed after the ferry was discontinued in 1921. Within a span of a few years, the City Council approved funding for two bridges across the Duwamish River. One was completed in 1924 and the other in 1930. In 1984, a high bridge was built, replacing the two earlier bridges (Tate 2001).

In the 1920s and 1930s, like many neighborhoods in Seattle, racially restrictive covenants were found in a number of residential developments in the West Seattle area. One example of such racially restrictive covenants was found in 28 property deeds of the Williams Alki Addition subdivision. Developed by Franklin and Mary Williams between 1926 and 1929, this covenant was included in the deeds, restricting the sale or rental of the property to Asian Americans, Filipino Americans, and African Americans (UW 2020).

In 1934, the last of three Natatoriums on Alki Beach was constructed by a private developer, north of the lighthouse on the shore. The Alki Natatorium was an indoor swimming pool housed within a glass-roofed building. Initially closed in 1939 after a tragic accident, the property was taken over by the City of Seattle and reopened in 1942. The property closed and was demolished in 1953, as renovation costs were deemed too high. The site was filled and landscaped (Corley 1969c; Sherrard 2016).

Area 7: Duwamish

The first non-Indigenous settlers in the Duwamish area were Luther Collins, Jacob Maple, Samuel Maple, and Henry Van Asselt, who filed land claims in the early 1850s. In 1871, developer Julius Horton purchased some of the Collins claim, and platted Georgetown (Wilma 2001a).

The Duwamish area soon became the industrial powerhouse of Seattle. In 1874, enterprising locals in Seattle built the S&WW from its start at Steele's Landing in Georgetown to the coal fields near Renton and then north to those near present-day Newcastle (Link 2004:3; MacIntosh and Crowley 1999; Smith 1983; Wilma 2001a).

In 1883, Andrew Hemrich and John Kopp founded Bay View Brewery overlooking Elliott Bay. The brewery was renamed Seattle Brewing and Malting Company Brewery Bay View Branch in 1893, Bay View Milling Company in 1919, Century Brewing Association in 1933, and finally in 1936, Rainier Brewery. Over the years, the Bay View Brewery expanded numerous times, was one of the area's largest employers and the historic property was listed in the NRHP in 2012 (Howard and Chase 2012).

Around 1895, the U.S. Army Corps of Engineers started to dredge the Duwamish River, which spurred additional industrial development in the area. The dredged material was dumped near the mouth of the river, creating Harbor Island (Tate 2001; Wilma 2001c).

By the turn of the twentieth century, agriculture was the main industry in the Duwamish area and in 1904, Georgetown was incorporated (Smith 1983; Wilma 2001a). In 1907, the Georgetown Steam Plant began operation as a "standby" electrical plant, only switching on during peak demands for power. In 1951, Seattle City Light purchased the property, and it was last operated in 1972. The Georgetown Steam Plant was listed in the NRHP in 1984 (Caldbick 2016). In 1910, Seattle annexed Georgetown (Wilma 2001a).

In the Olmsted Brothers' 1908 report for Seattle's parks and boulevards, they recommended a playfield in the South Park neighborhood. By 1910, just over 5 acres of land was purchased, and two years later, the City began construction of the ballfield (Beckner and Perrin 2016; Friends of Seattle's Olmsted Parks 2023b).

In order to create more land along the Duwamish River for agriculture and industry, beginning in 1913 the area was logged; the river was rerouted, straightened, and channelized; and the tidelands were drained, dredged, and filled. The renamed Duwamish Waterway supported large industrial complexes, such as shipbuilders, foundries, clay and coal plant, terracotta factory, an antimony smelting and refining plant, iron works, flour mill, meat packer and slaughterhouse, creosoting works, lumber mills, warehouses, and Boeing Company Plant 1, which was constructed in 1916 to build aircraft for the military (Oldham 2020; Updegrave 2016; Wilma 2001c).

Founded by William E. Boeing, the Boeing Company struggled financially after World War I. Boeing began manufacturing furniture, power boats, and sea sleds. The company organized a subsidiary company to deliver mail and began making fast, powerful aircraft for mail delivery.

1928, King County established Boeing Field after Boeing threatened to leave the Seattle area (Crowley 2003).

In 1932, another industrial complex, the Ford Motor Company Assembly Plant, was built in the Duwamish area. The plant, designed by Albert Kahn, promised to employ 2,000 workers in automobile production. However, due to the economic impacts of the Great Depression, the plant shut down after six months and was operated as a Ford sales and service facility until 1941. Ford sold the plant to the U.S. military, who expanded the property to be used as an U.S. Army Depot. The property was leased to and then purchased by Boeing for a missile production center and finally sold back to the federal government for military use. The Ford Motor Company Assembly Plant was listed in the NRHP in 2013 (Lamprecht and Hetzel 2013).

This industrial growth created additional employment opportunities, and additional residences and apartment buildings were constructed in the surrounding residential neighborhoods to house the influx of workers (Oldham 2020; Updegrave 2016).

Like most of the United States, the Great Depression hit Seattle hard, as the area's industries faltered, jobs were lost, and subsequently, the population fell. The arrival of World War II and the corresponding growth in war supporting industries slowed the decline. Also, during World War II, the U.S. Government created the Bracero Program to create a pathway for Mexicans to migrate to the U.S. to fill a labor shortage in the agriculture and war industries. Boeing was one of those industries that thrived during the war. By 1944, the company expanded to employ tens of thousands of workers, who made thousands of aircraft in support of the war effort. Many of these workers were from Mexico. They were originally brought to work in the central and eastern Washington's agricultural regions through the Bracero Program; some then migrated to western Washington to obtain jobs in the higher-wage war industries, such as Boeing. Many of these workers and their families settled in the South Park neighborhood. Boeing's support continued through the Cold War and Korean War, then in the 1960s began manufacturing domestic airliners. During the Boeing Bust beginning in 1969, Boeing laid off a total of 86,000 workers. The Bust caused a regional economic decline, but by 1972, Boeing was back on track manufacturing for the military and airlines across the globe (Gamboa 2019; Kershner 2015; Sanchez 2011).

Area 8: SE Seattle

The neighborhood of Beacon Hill had its beginnings on Henry Van Asselt's land claim, which early non-Indigenous settlers called Maple Hill. These settlers harvested timber and farmed, and many platted their lands between 1869 and 1878. One of the first African Americans to purchase land in the Beacon Hill area was businessman George Riley, who, backed by a group of Portland investors, bought land in 1869. These lands were platted in 1875 as Riley's Additions to South Seattle. The northern side of Beacon Hill was annexed to Seattle in 1883 (Tobin 2004a; Wilma 2001e).

The first non-Indigenous settler in the area that would become Rainier Beach was Joseph Dunlap and his family. Like many other early settlers, he built a cabin, farmed, logged, and sold land to other settlers, and in 1904, Dunlap donated land for a school (Tobin 2004b).

By 1889, the north end of SE Seattle was dotted with small farms. Residential growth was stimulated when streetcars reached newly platted neighborhoods. The installation of a streetcar line between downtown and north Beacon Hill in the early 1890s led to residential construction in the area. Along the Rainier Valley, residential development boomed when J. K. Edmiston built the Rainier Avenue Electric Railway in 1891. By 1896, the line covered 12 miles and was renamed the Seattle, Renton and Southern Railway. The line opened up the area for additional settlement, and farmers used it to deliver crops into the Seattle markets. Hillman Investment Company bought some of Dunlap's land and platted the Atlantic City Addition in Rainier Beach in 1905. (Crowley 1999; Tobin 2004a; Wilma 2001e, 2001f).

In 1898, the City bought 235 acres from the state on the north side of Beacon Hill and, in 1911, built two water reservoirs there. This property became Jefferson Park in 1915 (Tobin 2004a; Wilma 2001e). In 1907, the City of Seattle annexed the Rainier Valley communities and the south side of Beacon Hill (Tobin 2004a, 2004b).

In 1904, Seattle Public Schools built the Beacon Hill School, and in 1912, the school was expanded to handle a growing student population. In 1909, Seattle Public Schools built the Colman Elementary School and later expanded it in 1940. Beacon Hill and Rainier Valley saw moderate development until about 1920 and into the 1930s, when a number of Italian and Japanese immigrants built homes on large lots and put in expansive gardens. Some of these landowners sold their produce at markets downtown, while others opened local community shops and restaurants (Handy et al. 2019; Tobin 2004a, 2004b).

In the Olmsted Brothers 1903 report for Seattle's parks and boulevards, Olmsted recommended the development of the Mt. Baker ravine into Mount Baker Park with a connecting parkway linking the park with present-day Jefferson Park, and construction of a boathouse and pier (Beckner and Perrin 2016; Friends of Seattle's Olmsted Parks 2023c).

In the 1920s and 1930s, in the SE Seattle area, racially restrictive covenants were found in a number of residential developments. One example of such racially restrictive covenants was found in 622 property deeds of the Ladd's 2nd Addition and Jefferson Park Addition #2 subdivisions. Developed by George Spencer between 1927 and 1930, the covenant restricted occupancy of the properties by anyone "other than one of the white or Caucasian race" except as domestic servants (UW 2020).

In 1931, the U.S. Public Health Service built the U.S. Marine Hospital on the north end of Beacon Hill. This monumental building anchors the north end of the SE Seattle area and was listed in the NRHP in 1978 (Kreisman 1978). As Boeing expanded during the lead up to World War II, wartime housing in the nearby Beacon Hill boomed, and the Seattle Housing Authority built projects such as the Rainier Vista and Holly Park developments. During World War II, the residents of Japanese ancestry who lived in the area, were forcibly removed and incarcerated

for the duration of the war. After the war ended, many Japanese residents never returned to the area, and many lost their businesses and homes, and their former farmlands were developed (Kreisman 1978; Studio TJP 2021; Tobin 2004a).

Also, during World War II, the U.S. Government created the Bracero Program to create a pathway for Mexicans to migrate to the U.S. to fill a labor shortage in the agriculture and war industries. While originally brought to work in the central and eastern Washington's agricultural regions through the Bracero Program, some of these workers migrated to western Washington to obtain jobs in the higher-wage war industries, such as Boeing. Some of these workers and their families settled in the SE Seattle area (Gamboa 2019; Kershner 2015; Sanchez 2011).

After World War II, development in the SE Seattle area began again with a new Veterans Hospital (built in 1951) in Beacon Hill, new schools in many communities, and an influx of single-family homes and multi-family residential apartments across the communities. Around the same time, African Americans, Filipino Americans, Mexican Americans, Chinese Americans, and Southeast Asians began moving into the Beacon Hill area, creating a diverse community. In the South Beacon Hill neighborhood, Chinese American architect Jimmie S. Eng, who emigrated from China in the mid-1920s, designed and built a home for his family in 1966. The home was listed in the NRHP in 2019 (Chinn 2022; Cook 2019; Tobin 2004a).

The area's population that had stagnated during the Great Depression began to climb after World War II. By the 1960s, the post-war baby boom, urban flight, desegregation, and the Boeing Bust moved residents out of the city into the suburbs, which prompted the city to build new schools in the suburbs, including in Beacon Hill. The area's students were moved to new schools, and by 1971, the old Beacon Hill School building was vacant (Handy et al. 2019; Wilma 2001e). On October 11, 1972, frustrated by discrimination and lack of solutions to the challenges they faced, a coalition of the area's community leaders, including Roberto Maestas from the Chicano community, Larry Gossett from the African American community, Bernie Whitebear from the Native American community, and Bob Santos from the Asian American community, occupied the vacant school with over 100 supporters. It took until May 1973 for the City to sign a lease with the group, who then established El Centro de la Raza, a social service, civil rights organization, and community resource center. In 1999, El Centro purchased the building, which was listed in the NRHP in 2019 (Handy et al. 2019; Wilma 2001e, 2001f).

In the early 1960s, the Chevra Bikur Cholim congregation moved to Seward Park. After merging with Congregation Machzikay Hadath in 1971, they sold Synagogue No. 3 in the Central District to the City of Seattle. The following year, in 1972, Congregation Bikur Cholim—Machzikay Hadath completed Synagogue No. 4 in Seward Park (BCMH 2023; Michelson 2023).

In 1965, the Filipino Community Center opened on what is now Martin Luther King Jr. Way South, in Hillman City neighborhood (Chinn 2011).

The Colman Elementary School closed in 1973, as enrollment had plummeted. The school was used for a short time as a temporary, alternative school facility, before closing permanently in

1985. That year, a group of African American activists occupied the building, hoping to convince the City to allow them to create the Northwest African American Museum on the lower floor, with 36 lower-income apartments on the upper floor. The move was successful, and in 2008 the project was completed. The Colman School was designated a Seattle Landmark and listed in the WHR in 2005 (Johnson Partnership 2005a, 2005b).

In 1974, the 12th Avenue Bridge (1912) that links the International District to Beacon Hill was renamed in honor of Dr. Jose P. Rizal. Dr. Rizal was a 19th century Filipino patriot, artist, historian, and writer who was executed by the Spanish for his anti-colonial efforts on behalf of all Filipinos. After a campaign by Filipino American civil rights activists, the bridge was renamed, and the Dr. Jose P. Rizal Park was constructed in his honor (Hedden 2013).

Acronym Definitions

BSO—Buildings, Structures, Objects

DAHP—Washington Department of Archaeology and Historic Preservation

GLO—General Land Office

HPI—Historic Property Inventory forms

NHL—National Historic Landmark (the Nation's highest level of significance)

NRHP—National Register of Historic Places

SL—Seattle Landmarks

TCP—Traditional Cultural Properties

WHBR—Washington Heritage Barn Register

WHR—Washington Heritage Register

WISAARD—Washington Information System for Architectural and Archaeological Records database

Current Conditions

Data & Methods

To establish the presence and location of known historic and cultural resources in the study areas, for the purposes of this report, a GIS Specialist gathered building data from the King County Assessor's website, reviewed DAHP's online database, WISAARD, and Seattle City Landmarks online database for:

- Historic-period aged parcels;
- cultural resource survey reports;
- archaeological site records;
- HPIs;
- TCPs; and
- NHL-listed, WHBR-listed, NRHP- and WHR-listed and eligible resources; and
- SLs.

Cultural Data Sources

City of Seattle Landmarks List

- Established by City's Landmark Preservation Ordinance in 1973.

- Landmarks Preservation Board reviews and approves nominations, negotiates a Controls and Incentives Agreement with the property owner, and issues designations. The City Council issues a designating ordinance. The Board also reviews proposed alterations to Landmarks and issues Certificates of Approval.
- Affords the highest protection for designated historic properties.
- Landmarks List database contains a property's Landmark nomination form, designation reports, and the designating ordinance imposing controls upon the property.
- Landmarks List contains over 400 designated improvements (buildings and structures), objects, and sites.
- Landmarks Map shows location of each Landmark and each Landmark District.
- To be considered for designation, resources must meet certain designation standards. The resource must be at least 25 years old; must have significant character, interest, or value as part of the development, heritage or cultural characteristics of the city, state, or nation under one or more of the six criteria for designation; and must have sufficient integrity to convey its significance.
- For more information, go to https://www.seattle.gov/neighborhoods/historic-preservation/city-landmarks.

City of Seattle Landmark Districts

- Established by the City's Landmark Preservation Ordinance.
- There are eight historic Landmark Districts, each is regulated by a District Board or the Landmarks Preservation Board, per the District's Ordinance.
- Landmark Districts website links to each District's page with a short history, boundary map, link to the District Ordinance, guidelines, forms, FAQs, and Board meeting schedules, agendas, and minutes, and other information.
- For more information, go to https://www.seattle.gov/neighborhoods/historic-preservation/historic-districts.

King County Assessor's website

- Data includes GIS locational data (parcel number and address), year built, and year renovated for each building/structure on each parcel. Parcels that contain a building that is 40 years old or older are indicated on the "Historic-Aged Parcels and NRHP-Eligible Properties" maps.
- This data is updated regularly with information from renovation and demolition permits.
- For more information, go to https://kingcounty.gov/services/gis/Maps/parcel-viewer.aspx.

Washington Department of Archaeology and Historic Preservation (DAHP) WISAARD database

- The state's repository for public cultural resource data (NRHP-, WHR-, and NHL-listed and NRHP-eligible (for listing) historic properties/districts, cultural resource survey reports, historic property inventory (HPI) forms, and archaeological predictive model) and non-

public archaeological data (archaeological site forms, most TCPs, and archaeological inventory reports).

- Data is updated as surveys and inventories are performed, and new information is entered.
- Some HPI forms were created by data transfer for a series of Assessors Data Projects for a few counties in the state. The resources were not formally surveyed and recorded, have neither eligibility recommendations nor determinations of eligibility, and the forms contain no survey data.
- For more information, go to https://wisaard.dahp.wa.gov/.

Black Historic Sites Survey

- Sponsored by the National Park Service (NPS), DAHP, and the City of Tacoma.
- Initiated by the 1985 work of Esther Mumford, *Black Heritage Survey of Washington State*.
- Work continues on identifying and documenting Black Historic Sites by a team comprising Guided Methods with project lead, Monette Hearn, and Studio TJP.
- The study identifies Black creators, including architects, designers, engineers, artists, builders, etc. whose work contributes to the history of Washington.
- Survey includes public outreach and extensive research and documentation, HPI forms, biographies, and the identification of up to 50 significant sites.
- Additional goals include the nomination of two sites to the NRHP and the identification of other important Black History sites across the state.
- For more information, go to https://www.blackhistoricsiteswa.com/.

Latino Heritage Survey Sites

- Sponsored by NPS, the Washington Trust for Historic Preservation (WTHP), and DAHP in 2015 and 2018.
- Study by Artifacts Consulting in the greater Seattle area and the Yakima Valley.
  - The study included oral interviews with community members, 37 HPIs, two NRHP nominations, and a report Latino Heritage of Greater Seattle: Intensive Level Survey Documentation and Illustrated Historic Context Statement (2019), with the historic context, "King County Latino Heritage: WWII–1980s" written by Dr. Erasmo Gamboa.
  - 20 sites were identified in Seattle.
- For more information, go to https://dahp.wa.gov/sites/default/files/Seattle_Latino_ContextStudy_2019.pdf.

To plot the location of architectural resources for this EIS, a GIS Specialist created maps, using Alternative 5 as the base map because it was the most extensive amount of change studied in the Draft EIS and it allows for the maximum impact analysis. These maps show~~ing~~ the locations of parcels that meet the following criteria:

- Include SL designated historic properties and districts;

- Include NRHP-listed or NRHP-eligible historic properties or are included in NRHP-listed historic districts; and
- Include built resources 40-years-old or older (old enough to require evaluation for listing in the NRHP, WHR, WHBR and NHL).

The Seattle Historic Resources Survey Database was not utilized in the creation of the architectural resources maps. This database was compiled from survey and inventory projects that began in the late 1970s–1980s, were revived again in 2000, and although funding was discontinued in 2011, some survey work continued for a few years after that. The approximately 8,000 resources entered in the database have varying levels of documentation. Some have been surveyed and inventoried, and contain background research, description of the resource, brief discussion of the resource's integrity, and evaluation of its significance. Some database entries have little to no information about the resources, contain no discussions of integrity or significance, and make no evaluation recommendations. None of the resources in the database have formal evaluations for eligibility to the SL, NRHP, or WHR. Very few of the resources have been updated since their initial documentation—some of which were written over 30 years ago. Additionally, due to the lack of updating, it is unknown if resources have sustained alterations over time that may have led to loss of original character-defining features including style, design, form, materials, site/landscaping. It is also unknown how many of the resources are still standing or how many were demolished. Thus, the database does not contain data useful for analysis for this EIS and these resources were not added to the maps in this report. However, the database remains a useful tool when performing property research.

To prepare historic contexts for the project areas, which can be used to assist researchers in analyzing the significance of cultural resources, the consultants reviewed published and online sources, gathering information on the environmental, archaeological, and historical context of the project vicinity. As part of the Seattle Historic Resources Survey projects, a number of historic contexts were developed about many of Seattle's neighborhoods. They were written between 1997 and 2015 and were utilized for this EIS. The consultants reached out to a number of cultural community experts to gather information on culturally important resources within their community. Research staff also examined historic-period maps and aerial photographs, including GLO plats, which are nineteenth-century maps available online through the Bureau of Land Management (BLM) website. They can be used to locate potential historical features including former structures, trails, and transportation routes. Although these features may no longer be extant, these maps indicate where historic-period cultural resources, including archaeological materials, may be encountered. Other historic maps (e.g., U.S. Geological Survey [USGS] maps, Sanborn Fire Insurance maps, County atlases) were reviewed through online resources.

Based on environmental characteristics, ethnographic data, and the distribution of previously recorded cultural resources, HRA formulated initial expectations about the sensitivity of the analysis areas for containing cultural resources. DAHP's statewide predictive model layer was also reviewed for probability estimates of the presence of precontact cultural resources.

Citywide

Cultural resources identified in the full study area (including architectural resources such as districts, sites, buildings, landscapes, structures, or objects, and archaeological resources such as precontact Native American artifacts, features, and sites; Traditional Cultural Properties; and historic-period artifacts, features, and sites) that are 40 years old or older, and listed or eligible for listing in the NHL program, NRHP, WHR, WHBR, or in the SL program, whose age threshold for inclusion is 25 years old or older.

Architectural Resources

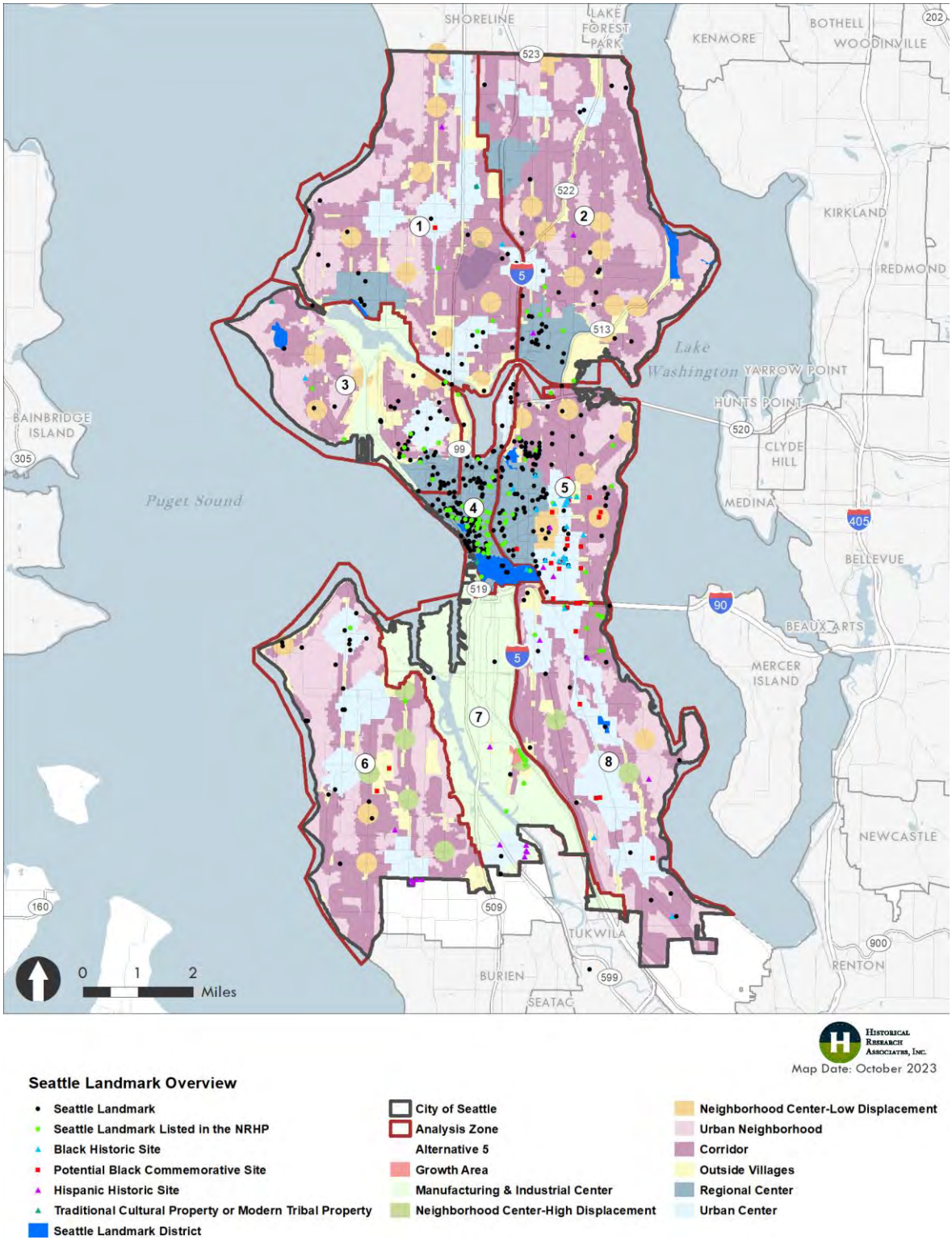
Within the Citywide study area, there are 7 NHL properties and several properties that are listed in the SL, NRHP, and WHR. There are 8 Seattle Landmark Districts, 24 NRHP-listed historic districts, and 1 WHR-listed historic district in the full study area. Citywide there are 474 properties that are designated Seattle Landmarks, 200 NRHP-listed historic properties, and 48 WHR-listed properties. Additionally, there are 31 Black Historic Sites, 28 Potential Black Commemorative Sites, and 20 Hispanic Historic Sites (Culturally Important Resources) within the citywide study area (**Exhibit 3.9-1** and **Exhibit 3.9-2**) (Sources: the Washington State Black Historic Sites Survey and the 2018 Latino Heritage Survey). There are no historic agricultural barns listed in the WHBR within the study area.

Current King County Tax Assessor's data provides one indication of how many historic-period, built-environment resources are located within the study area. For the purposes of this EIS, the historic period refers to buildings that are 40 years old or older. According to the King County Tax Assessor, there are 135,367 historic-period buildings within the full study area, of which 124,037 are residential buildings (single-family dwellings, townhouses, duplexes, triplexes, fourplexes, apartment buildings, and condominiums), and the remaining 11,330 are commercial, industrial, and governmental buildings (**Exhibit 3.9-3**).

In contrast, DAHP's WISAARD database provides another indication. WISAARD records show 104,492 built resources within the full study area that were 50 years old or older in 2011. Of these, 1,208 were determined NRHP-eligible by DAHP or a federal agency (**Exhibit 3.9-3**). In 2011, WISAARD was updated for an Assessors Data Project for King County to provide a snapshot of buildings that were constructed in 1961 or earlier. These buildings were issued historic property identification numbers and HPI forms. The HPI forms created by the Assessors Data Project were not formally surveyed and recorded, have neither eligibility recommendations nor determinations of eligibility, and the forms contain no survey data of any kind.

The discrepancy between the Assessor's and DAHP's records are likely due in part to demolitions that alter County Tax Assessor's records but do not change the records in DAHP's WISAARD database, and/or a lack of up-to-date survey and recordation of historic-period resources on HPI forms in WISAARD.

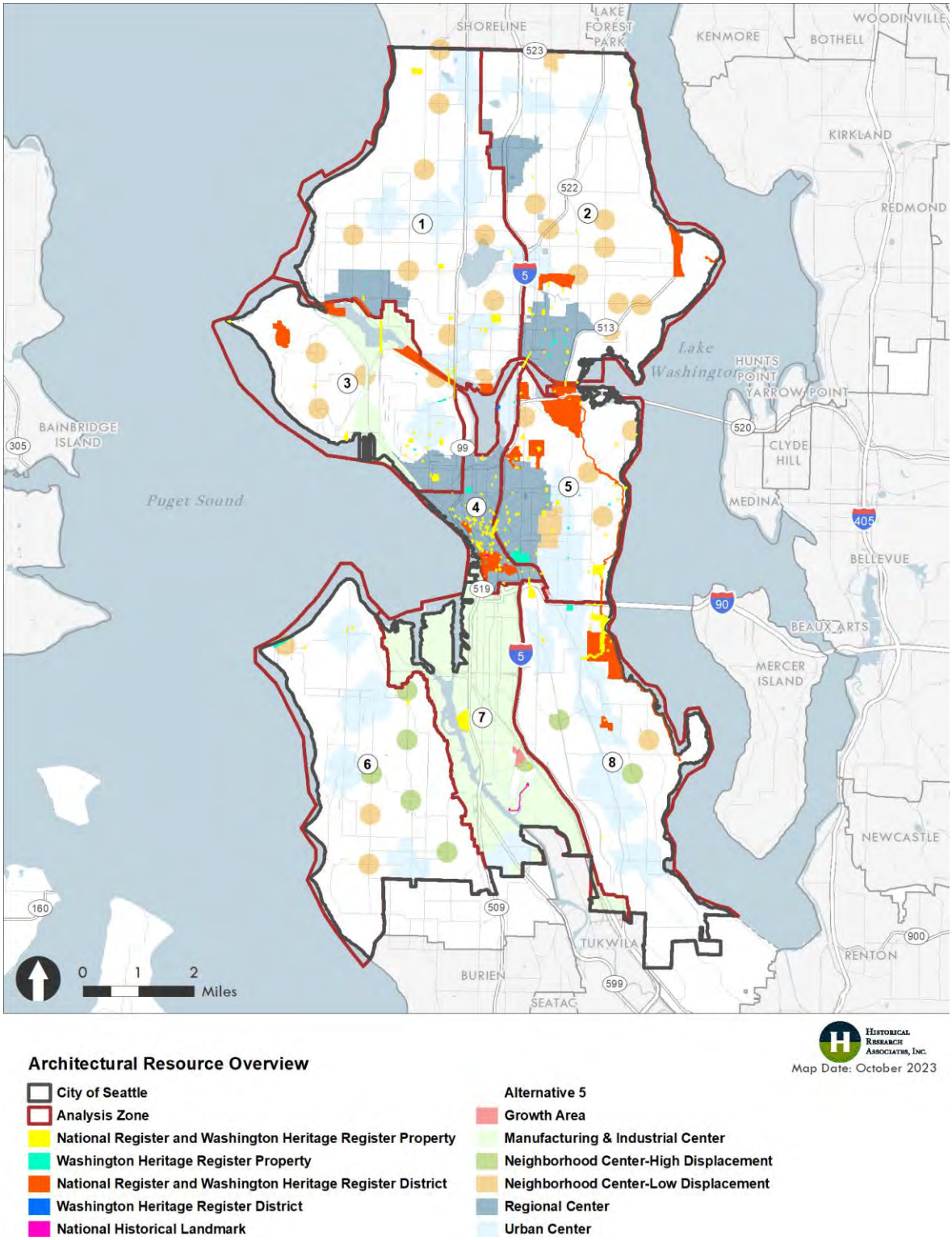
Exhibit 3.9-1. Designated Seattle Landmarks, Seattle Historic Districts, and Culturally Important Resources—Citywide



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

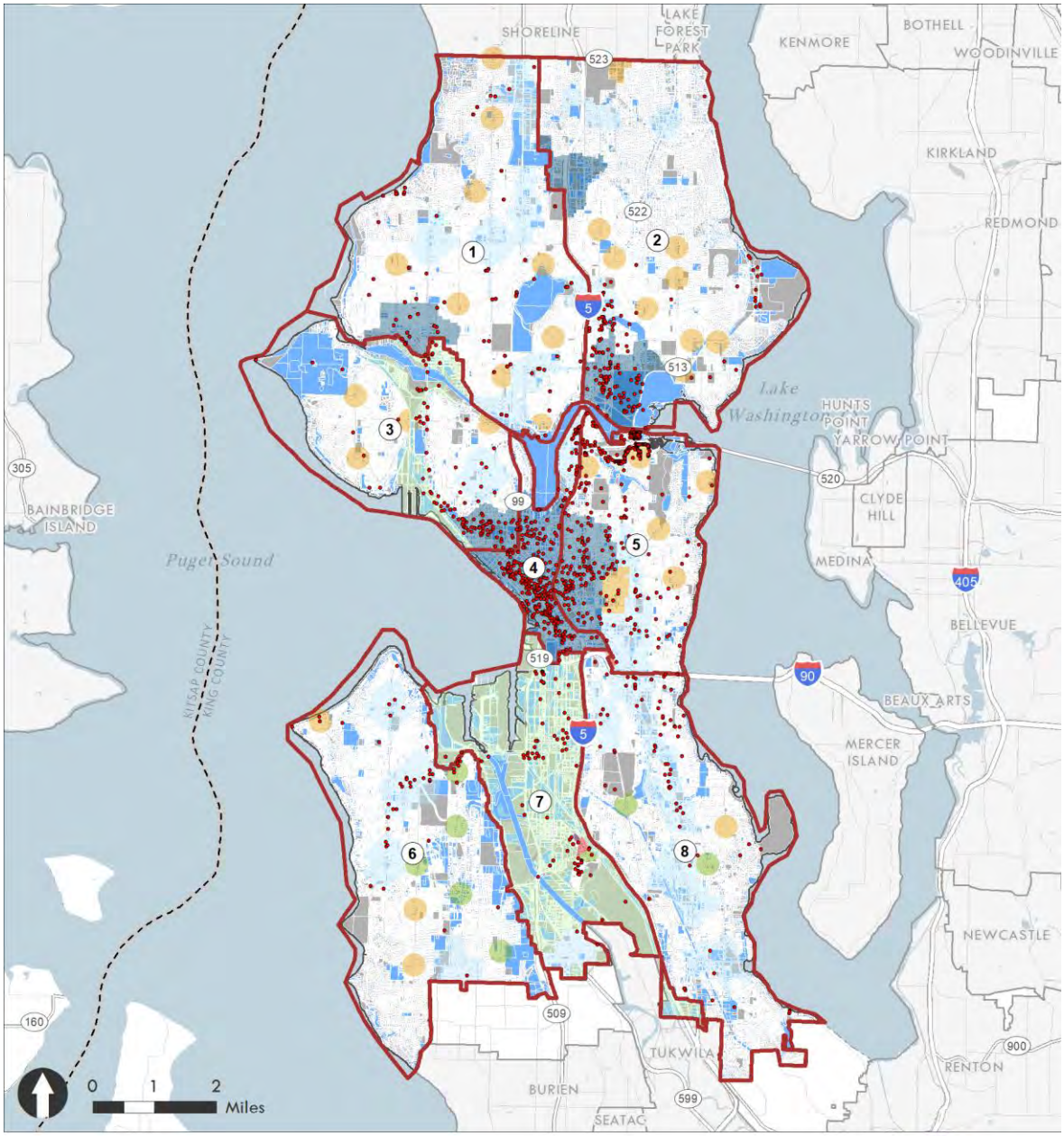
Exhibit 3.9-2. NRHP- and WHR-Listed Architectural Districts and Properties—Citywide



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

Exhibit 3.9-3. Historic-Aged Parcels and NRHP-Eligible Properties—Citywide



Historical Research Associates, Inc.
Map Date: October 2023

Register-Eligible Properties and Parcels

- Register-Eligible Property
- Historic-Aged Parcel
- Non-Historic-Aged Parcel
- Analysis Zone
- Alternative 5
- Growth Area
- Manufacturing & Industrial Center
- Neighborhood Center-High Displacement
- Neighborhood Center-Low Displacement
- Regional Center
- Urban Center

Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.
Source: HRA, 2023.

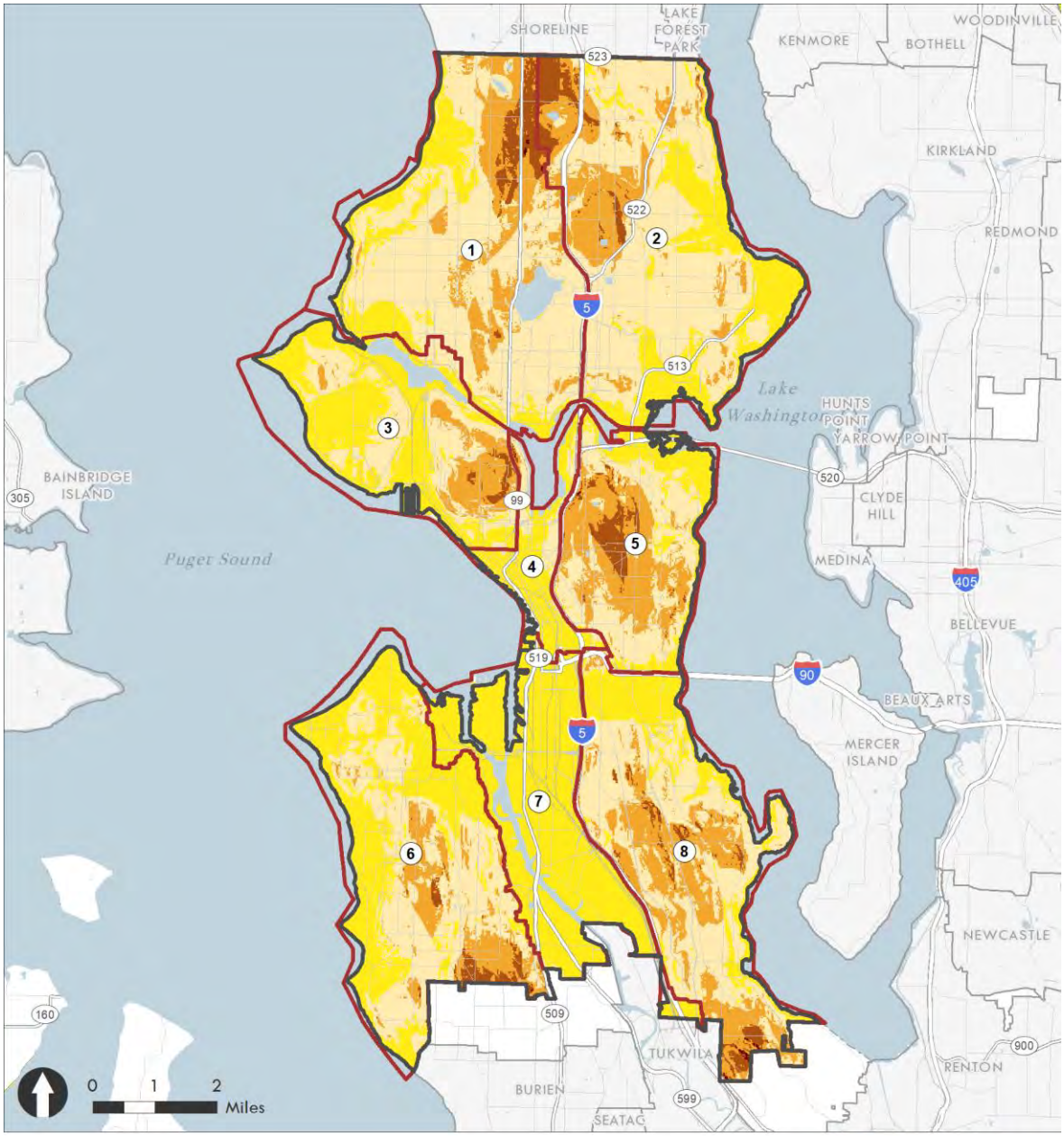
Archaeological Resources

Within the full study area, there are 135 previously documented archaeological sites. A total of 294 previous studies have been conducted within the full study area since 1995 that included archaeological investigations. One precontact site and two historic-period sites are listed in the NRHP and WHR. One of those historic-period sites is also a TCP. Two precontact sites and three historic-period sites have been determined eligible for inclusion in the NRHP. Two precontact sites and thirty-three historic-period sites have been determined not eligible for inclusion in the NRHP. The remaining thirteen precontact sites, seventy-five historic-period sites, and six multicomponent sites have not been formally evaluated. No TCPs were identified in WISAARD, however one, Ballast Island (45KI1189), is known to be within the full study area (Curti, et al. 2020; Elder and Cascella 2014; HRA 2018).

Per Washington state law (RCW 42.56.300), the locations of these sites are exempt from public disclosure in order to prevent their looting or depredation.

A majority of the area within each of the project subareas is considered of High or Very High Risk to contain precontact archaeological resources by DAHP's precontact archaeological site probability model, while areas of Moderately Low to Moderate Risk are typically located in hilly settings farther from permanent water sources (**Exhibit 3.9-4**).

Exhibit 3.9-4. Map Showing Archaeological Sensitivity from DAHP Model—Citywide



Source: HRA, 2023.

Maritime Washington National Heritage Area

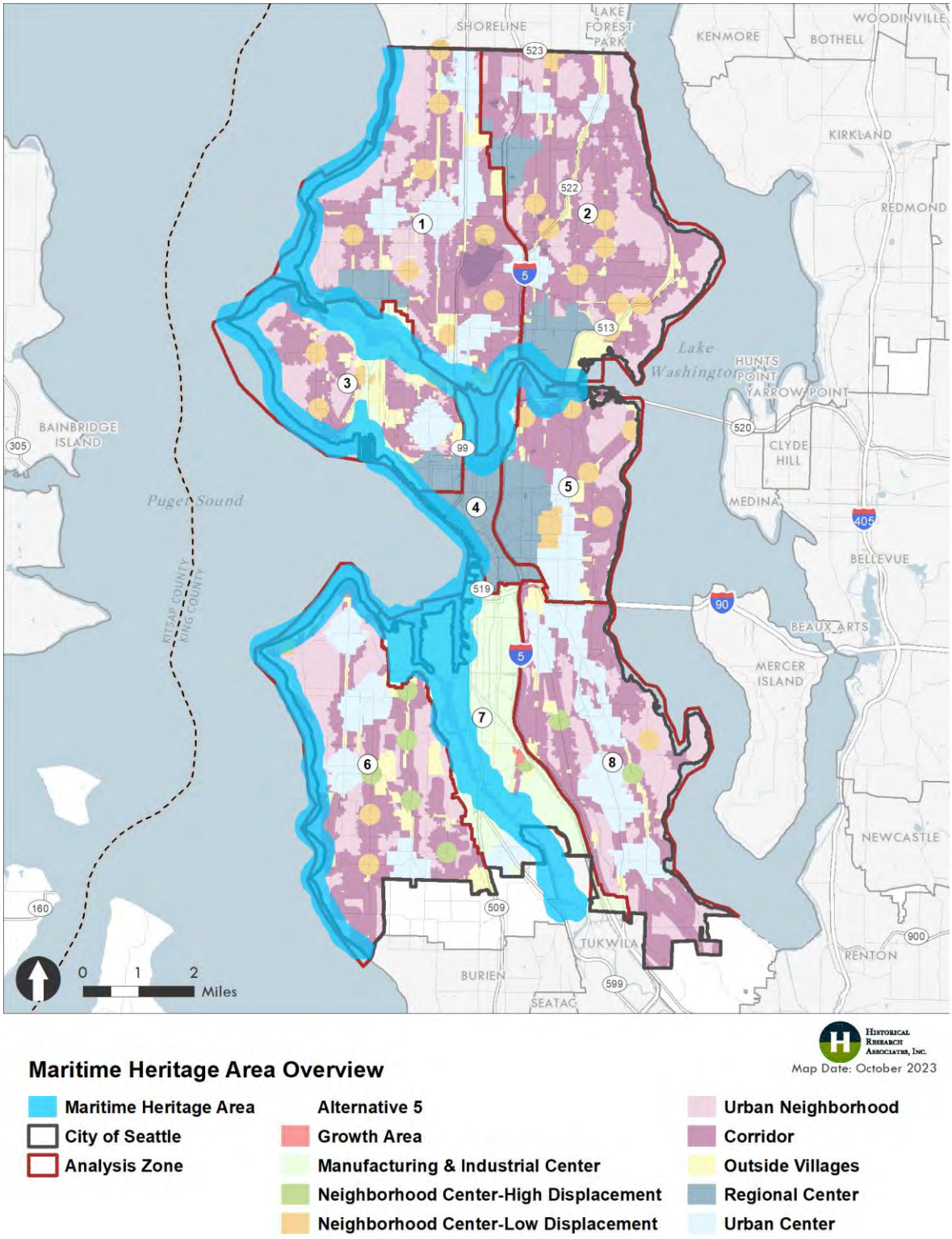
Congress designated the Maritime Washington National Heritage Area (MW NHA) in 2019 as a place recognized for its nationally important natural, cultural, historic, and recreational resources, which combine to form a nationally important landscape. The MW NHA stretches along 3,000 miles of saltwater shoreline from Grays Harbor County to the Canadian border. The MW NHA encompasses 18 federally recognized Tribes, 13 counties, 32 incorporated cities, and 33 port districts in Washington state. The MW NHA is a non-regulatory program coordinated by the Washington Trust for Historic Preservation (WTHP), Washington's statewide nonprofit historic preservation organization. The program will be guided by the Washington Trust Board of Directors, a Maritime Washington Advisory Board, and a Maritime Washington Tribal Working Group, with technical assistance and funding from the National Park Service (NPS). The MW NHA is a cooperative organization with regional representation that is supportive of tourism and economic development, and functions to build partnerships to support communities in maintaining and sharing their unique resources and telling the stories of those places (Maritime Washington 2022).

After receiving designation, the WTHP, with partners and community stakeholders developed a management plan that was submitted to the U.S. Department of the Interior and accepted in 2022. The plan includes the strategies, policies, and plans for the MW NHA program, guided by five key strategic goals:

- Goal One: Build a network of cross-sector partners dedicated to advancing, honoring, and stewarding Washington's maritime stories and resources.
- Goal Two: Provide support and resources for organizations, communities, and Tribes working to preserve, enhance, and share maritime heritage.
- Goal Three: Share diverse stories and increase visibility of Washington's maritime heritage, past and present.
- Goal Four: Encourage sustainable experiences of maritime heritage for residents and visitors alike.
- Goal Five: Preserve our region's unique maritime identity, resources, and lifeways.

The plan is an implementation framework that will guide the MW NHA's actions over the next five to fifteen years, and which includes directional guidance, interpretive plan framework, key sites from resources inventories, branding and marketing plan, business plan, and an implementation plan with short- and long-range actions and performance goals for the MW NHA (Maritime Washington 2022). **Exhibit 3.9-5** shows the portion of the MW NHA that occurs within the study area of this EIS. For more Information, go to the WTHP website, https://preservewa.org/programs/mariti--national-heritage-area/.

Exhibit 3.9-5. Maritime Washington Heritage Area that Occurs Within the Study Area



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

Analysis Areas

Area 1: NW Seattle

There are 1 Seattle Landmark District and 3 NRHP-listed historic districts found in the NW Seattle analysis area (**Exhibit 3.9-6**). There are 32 designated Seattle Landmarks in the NW Seattle area. Of these, 10 are education-related buildings, 6 are residential buildings, 5 are commercial buildings, 3 are former libraries, 3 are fire stations, 2 are bridges, 2 are parks, and 1 is a pool building. These resources are significant under a variety of the six standards for designation (**Exhibit 3.9-7**).

Exhibit 3.9-6. Area 1: NW Seattle—SL-designated and NRHP-listed Districts

Property Name, Type	Register/List Date/Significance	Period of Significance
Ballard Avenue Historic District	SL / 1976 / Criterion A for Contributions to the Development of Seattle, Criterion B for Commercial Development in Ballard, and Criterion C for Architecture	1890–1940s
Ballard Avenue Historic District	NRHP / 1976 / Criterion A for Industry, Commerce, Transportation, Politics/Government, and Criterion C for Architecture	1890–1930
Chittenden Locks and Lake Washington Ship Canal, Historic District	NRHP / 1978 / Criterion A for Commerce, Politics/Government, and Criterion C for Architecture, Engineering, and Landscape Architecture	1906–1917
Gas Works Park, Historic District	NRHP / 2013 / Criterion A for Industry, and Criterion C for Landscape Architecture	1973–1978

Sources: DAHP, 2023.

There are 14 NRHP-listed resources and 2 WHR-listed resources found in the NW Seattle analysis area. Of these, 2 are former schools, 2 are fire stations, 2 are residential buildings, 1 is a garden, 1 is a commercial building, 1 is a religious institution, 1 is a ship, and 3 are bridges, which were listed in the NRHP under the *Historic Bridges and Tunnels in Washington State MPD,* and, finally, 3 are Carnegie libraries, which were listed in the NRHP under the *Carnegie Libraries of Washington TR* (**Exhibit 3.9-8**).

Current King County Tax Assessor records show that within the NW Seattle area, there are 34,045 historic-period buildings. Of these, 31,588 are residential, including 30,325 residential buildings (single family dwellings, townhouses, duplexes, triplexes, and fourplexes), 1,104 apartment buildings, and 159 condominiums. The remaining 2,457 buildings are commercial, industrial, and governmental (**Exhibit 3.9-9**).

In contrast, DAHP records show 25,709 individual historic-period architectural resources have been entered on HPI forms within the NW Seattle area. Of these, only 59 were determined NRHP-eligible by DAHP or a federal agency and are plotted on the map (**Exhibit 3.9-9**). Many of the 25,709 HPI forms were created by data transfer for an Assessors Data Project for King

County. The resources in these HPIs were not formally surveyed and recorded, have neither eligibility recommendations nor determinations of eligibility, and the forms contain no survey data of any kind.

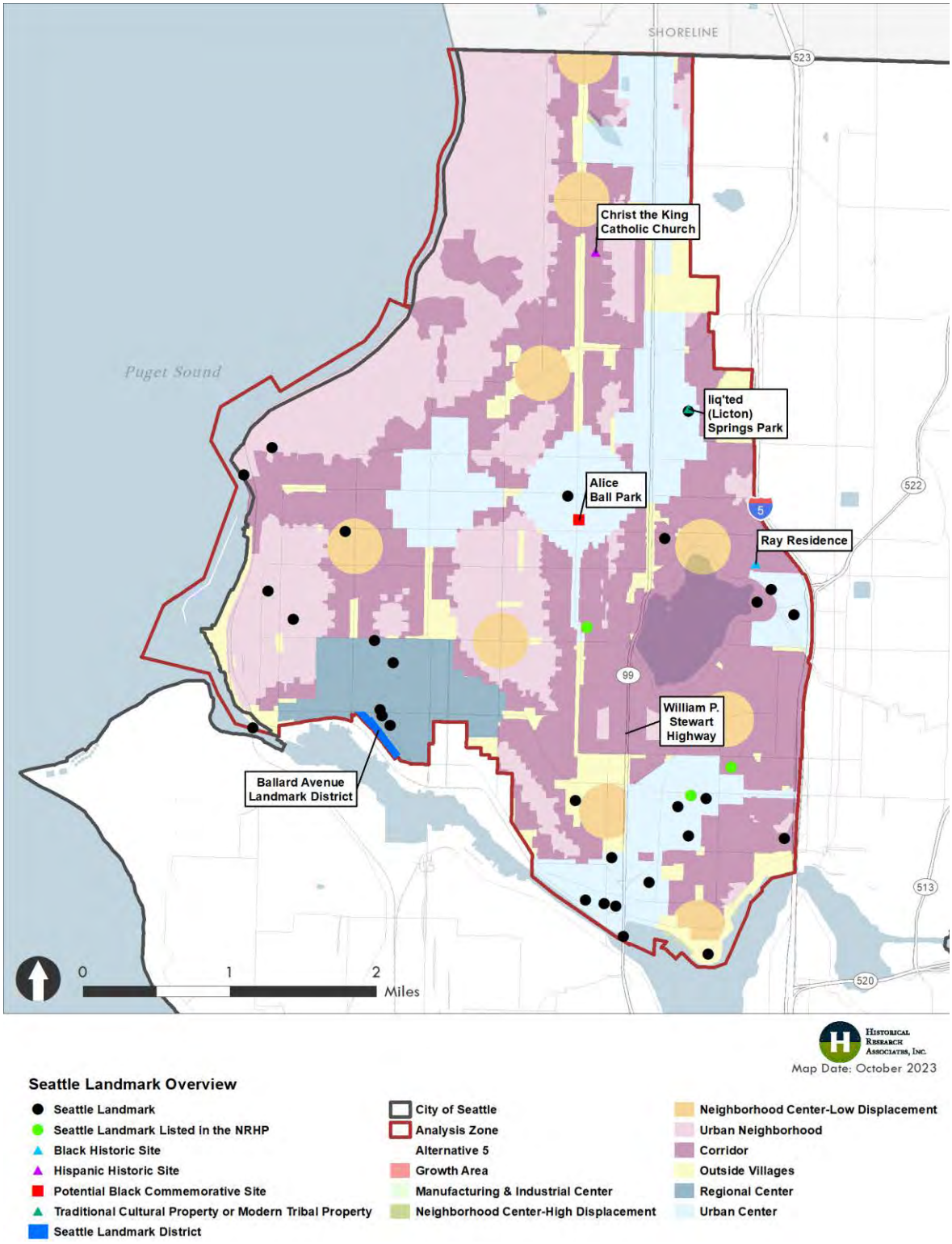
The discrepancy between the Assessor's and DAHP's records are likely in part due to demolitions that alter County Tax Assessor's records but do not change the records in DAHP's WISAARD database, and/or a lack of up-to-date survey and recordation of historic-period resources on HPI forms in WISAARD.

DAHP records show 40 cultural resources studies that included archaeological resources investigations that have been conducted within Analysis Zone 1 since 1995. One precontact site, six historic-period sites, and one multicomponent site have been recorded within Analysis Zone 1, none of which have been formally evaluated for listing in the NRHP. Most of the area within Analysis Zone 1 is considered of High or Very High Risk to contain precontact archaeological resources by DAHP's precontact archaeological site probability model. Areas of Moderately Low to Moderate Risk are located in upland settings to the west and southwest of Green Lake, as well as across the northeastern portion of Analysis Zone 1 (**Exhibit 3.9-10**).

Culturally Important Resources

There are 1 Black Historic Site (the Ray Residence), 2 Potential Black Commemorative Sites (Alice Ball Park, and the William P. Stewart Highway), and 1 Hispanic Historic Site (Christ the King Catholic Church) within Analysis Zone 1. Traditionally utilized as a clay source for the creation of red paint, a rust-red springs known as *l•qt¢d* ("Red Paint") is an important Tribal cultural resource located within present-day Licton Springs Park in Analysis Zone 1 (**Exhibit 3.9-7**) (Sources: the Washington State Black Historic Sites Survey and the 2018 Latino Heritage Survey; Thrush 2007:250–252).

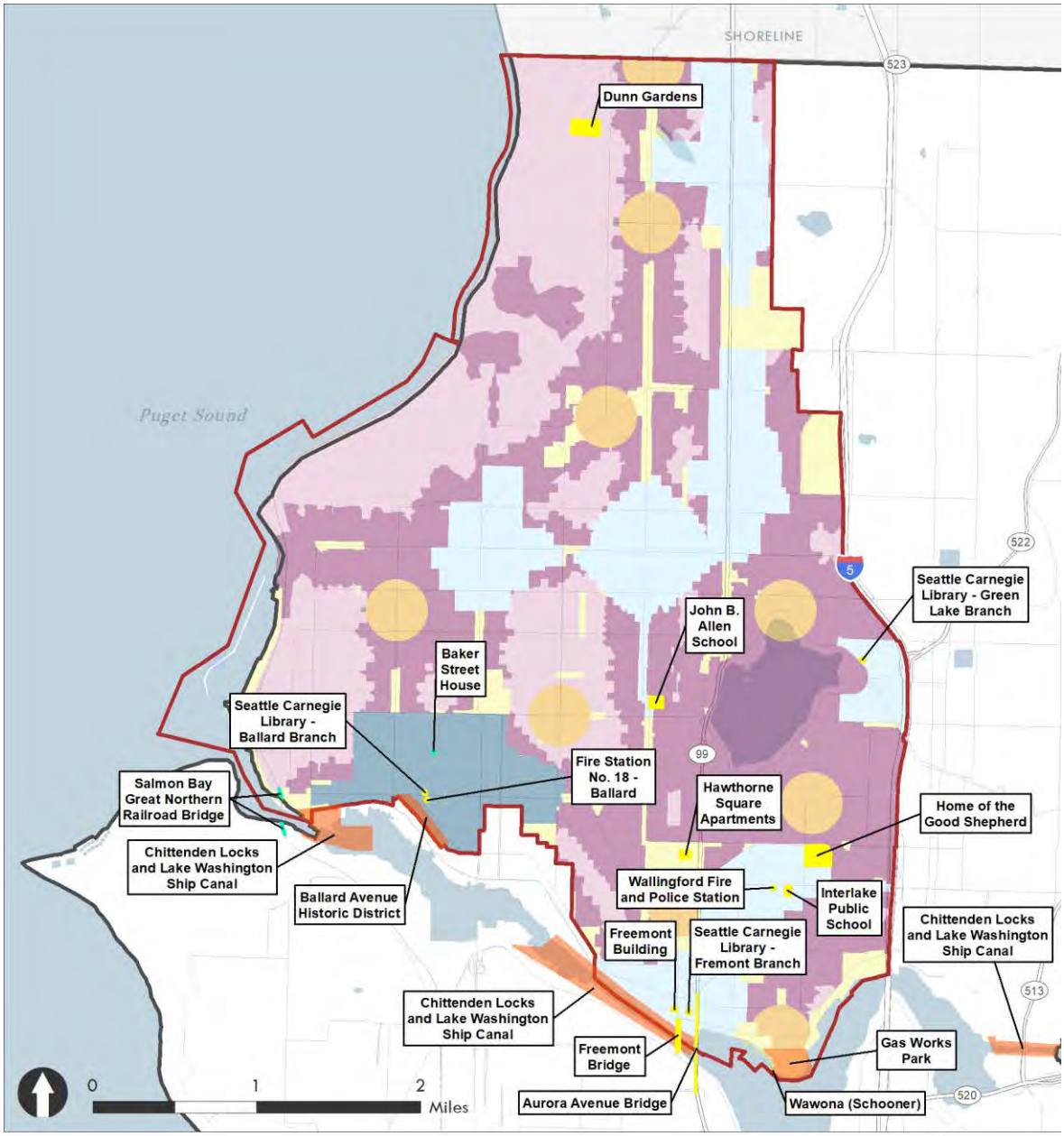
Exhibit 3.9-7. Area 1: NW Seattle—Designated Seattle Landmarks, Seattle Historic Districts, and Culturally Important Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

Exhibit 3.9-8. Area 1: NW Seattle—NRHP- and WHR-Listed Architectural Districts and Properties



Historical Research Associates, Inc.
Map Date: October 2023

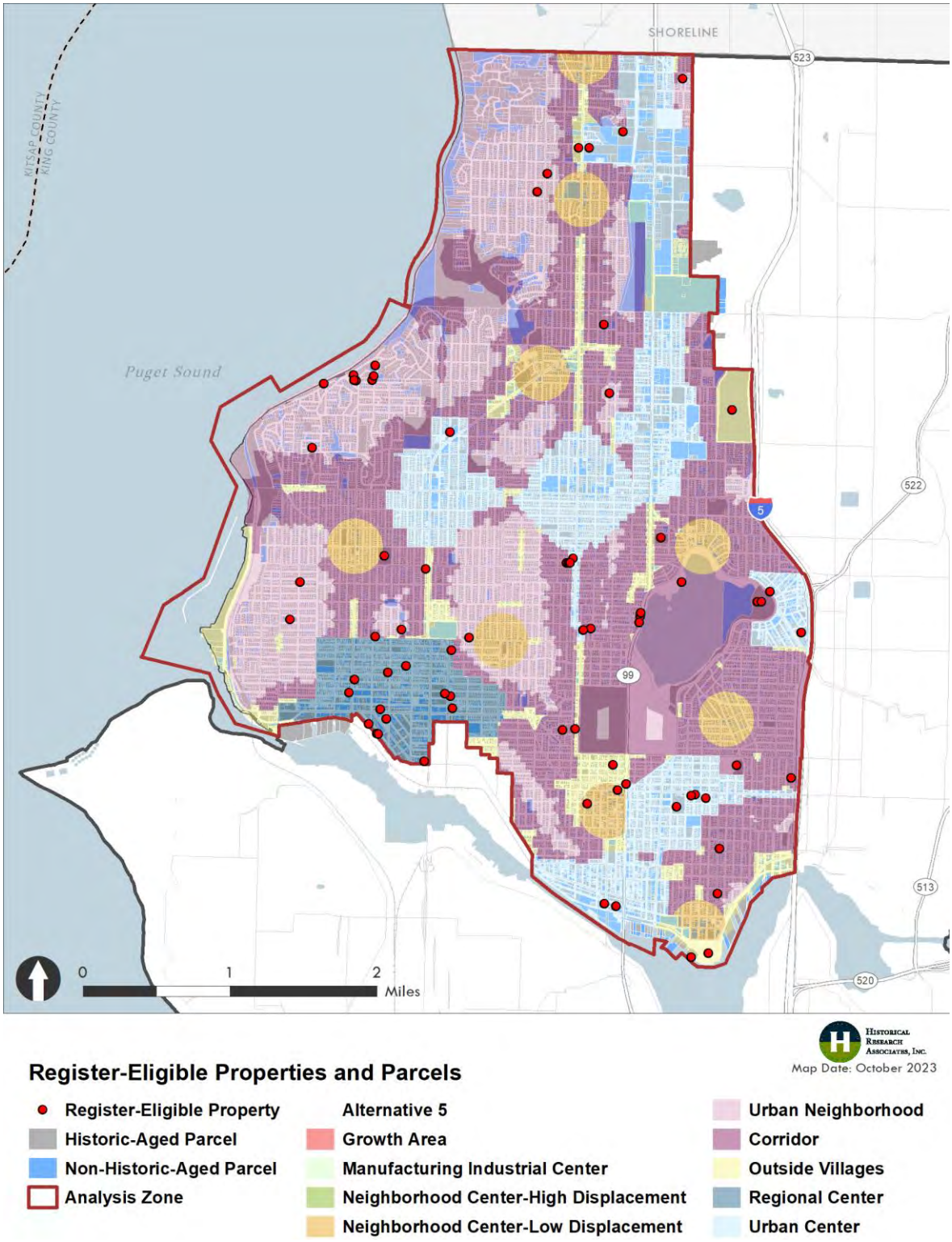
Architectural Resource Overview - Analysis Zone 1

- City of Seattle
- Analysis Zone
- National Register and Washington Heritage Register Property
- Washington Heritage Register Property
- National Register and Washington Heritage Register District
- Alternative 5
- Growth Area
- Manufacturing & Industrial Center
- Neighborhood Center-High Displacement
- Neighborhood Center-Low Displacement
- Urban Neighborhood
- Corridor
- Outside Villages
- Regional Center
- Urban Center

Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

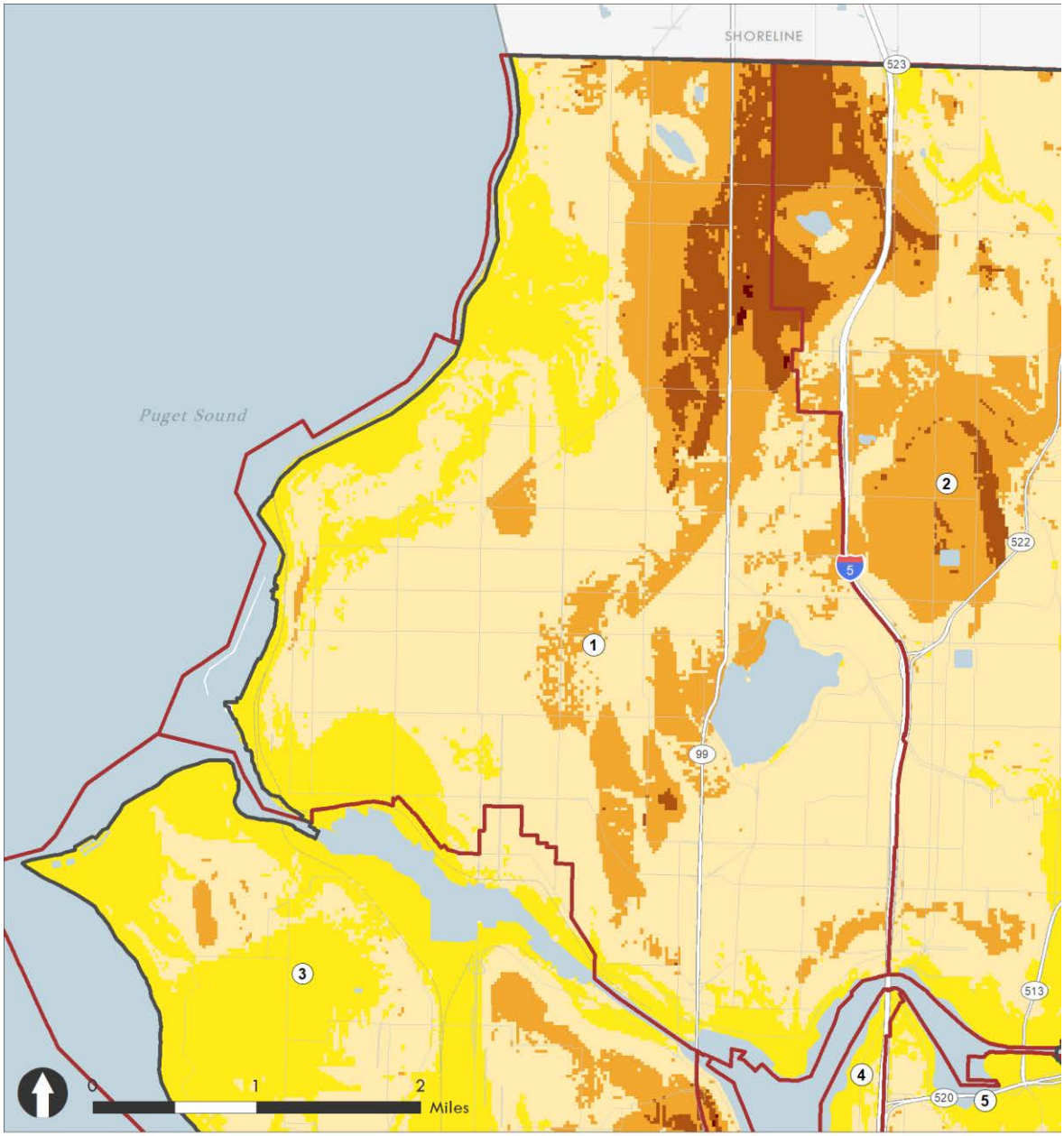
Exhibit 3.9-9. Area 1: NW Seattle—Historic-Aged Parcels and NRHP-Eligible Properties



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

Exhibit 3.9-10. Area 1: NW Seattle—Map Showing Archaeological Sensitivity from DAHP Model



Source: HRA, 2023.

Area 2: NE Seattle

There are 1 Seattle Landmark District and 3 NRHP-listed historic districts found in the NE Seattle analysis area (**Exhibit 3.9-11**). There are 39 designated Seattle Landmarks in the NE Seattle area. Of these, 13 are education-related buildings, 11 are residential buildings, 3 are religious institutions, 3 are former libraries, 2 are commercial buildings, 2 are fire stations, 2 are bridges, 1 is a hangar, 1 is a street clock, and 1 is a science and technology conference center. These resources are significant under a variety of the six standards for designation (**Exhibit 3.9-12**).

Exhibit 3.9-11. Area 2: NE Seattle—SL-designated and NRHP-listed Districts

Property Name, Type	Register/List Date/Significance	Period of Significance
Ravenna-Cowen North Historic District	NRHP / 2018 / Criterion A for Community Planning and Development, and Criterion C for Architecture	1906–1969
Chittenden Locks and Lake Washington Ship Canal, Historic District	NRHP / 1978 / Criterion A for Commerce, Politics/Government, and Criterion C for Architecture, Engineering, and Landscape Architecture	1906–1917
Sand Point Naval Air Station Landmark District, Historic District	SL / 2011 / Criterion A for Military, Criterion C for Political, Criterion for Architecture, and Criterion F as a Distinctive Visual City Feature.	1926–1953
Naval Air Station (NAS) Seattle, Historic District	NRHP / 2010 / Criterion A for Military, and Criterion C for Architecture	1929–1945

Sources: DAHP, 2023.

There are 18 NRHP-listed resources and 9 WHR-listed resources within the NE Seattle analysis area. Of the 26 individually listed resources, 10 are collegiate buildings, 4 are residences, 2 are religious buildings, 2 are commercial buildings, 1 is a school, 1 is a site, 1 is an object, and 4 are bridges, which were listed in the NRHP under the *Historic Bridges and Tunnels in Washington State MPD,* and, finally, 1 is a Carnegie library, which was listed in the NRHP under the *Carnegie Libraries of Washington TR* (**Exhibit 3.9-13**).

Current King County Tax Assessor records show that within the NE Seattle area, there are 28,352 historic-period buildings. Of these, 26,690 are residential, including 26,057 residential buildings (single family dwellings, townhouses, duplexes, triplexes, and fourplexes), 554 apartment buildings, and 79 condominiums. The remaining 1,662 buildings are commercial, industrial, and governmental (**Exhibit 3.9-14**).

In contrast, DAHP records show 21,298 individual historic-period architectural resources have been entered on HPI forms within the NE Seattle area. Of these, only 140 were determined NRHP-eligible by DAHP or a federal agency and are plotted on the map (**Exhibit 3.9-14**). Many of the 21,298 HPI forms were created by data transfer for an Assessors Data Project for King County. The resources in these HPIs were not formally surveyed and recorded, have neither

eligibility recommendations nor determinations of eligibility, and the forms contain no survey data of any kind.

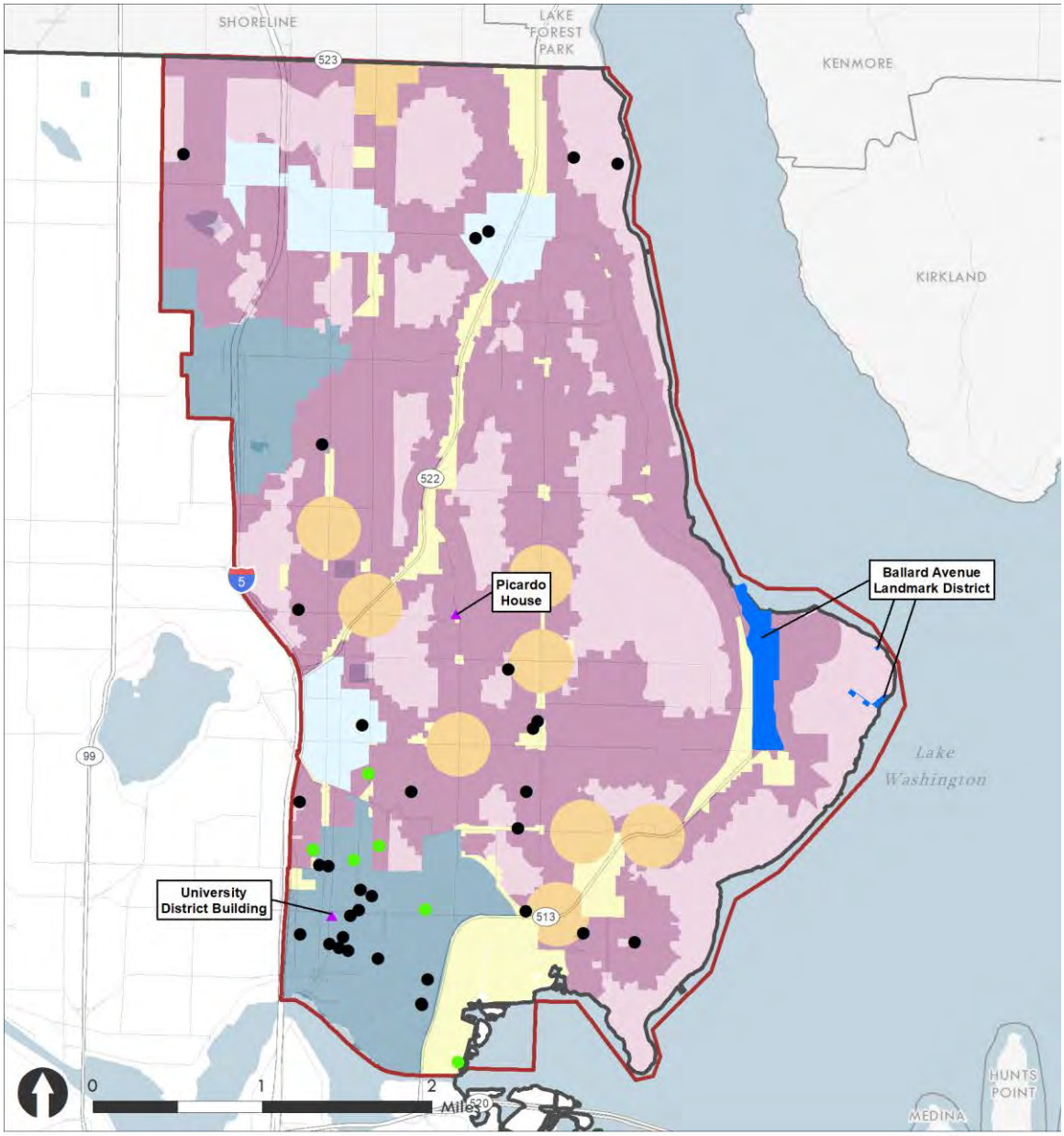
The discrepancy between the Assessor's and DAHP's records are likely in part due to demolitions that alter County Tax Assessor's records but do not change the records in DAHP's WISAARD database, and/or a lack of up-to-date survey and recordation of historic-period resources on HPI forms in WISAARD.

DAHP records show 42 cultural resources studies that included archaeological resources investigations that have been conducted within Analysis Zone 2 since 1995. Two precontact sites and nine historic-period sites have been recorded within Analysis Zone 2. Both precontact sites and one of the historic-period sites were determined not eligible for listing in the NRHP. The remaining historic-period sites have not been formally evaluated for listing in the NRHP. Most of the area within Analysis Zone 2 is considered of High or Very High Risk to contain precontact archaeological resources by DAHP's precontact archaeological site probability model, with areas of Very High Risk predominating along the shorelines and drainages. Areas of Moderately Low to Moderate Risk are located in scattered upland settings throughout the Analysis Zone 2, particularly within its northwestern portion (**Exhibit 3.9-15**).

Culturally Important Resources

There are 2 Hispanic Historic Sites (the Picardo House and the University District Building) within Analysis Zone 2 (**Exhibit 3.9-12**) (Source: the 2018 Latino Heritage Survey).

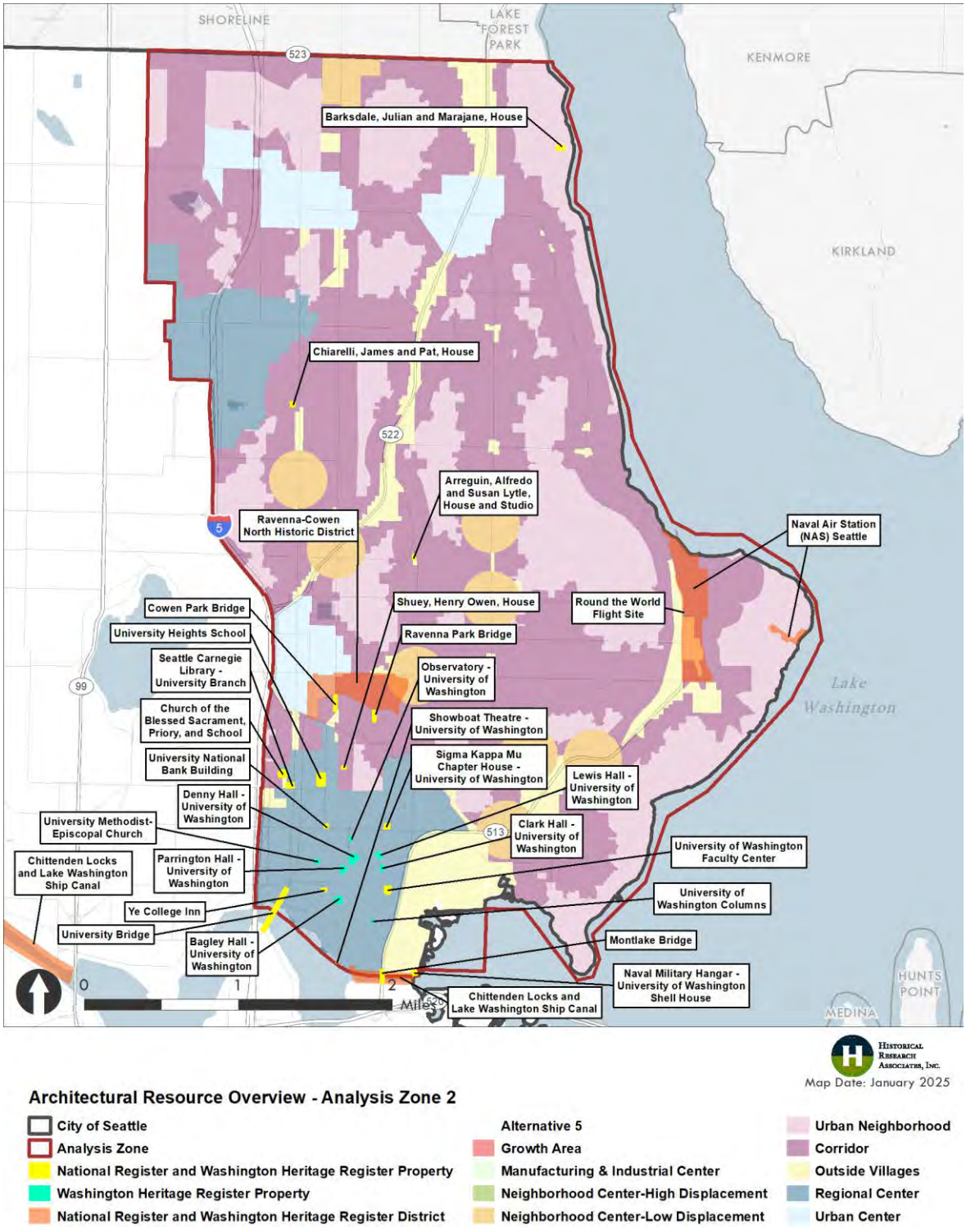
Exhibit 3.9-12. Area 2: NE Seattle—Designated Seattle Landmarks, Seattle Historic Districts, and Culturally Important Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

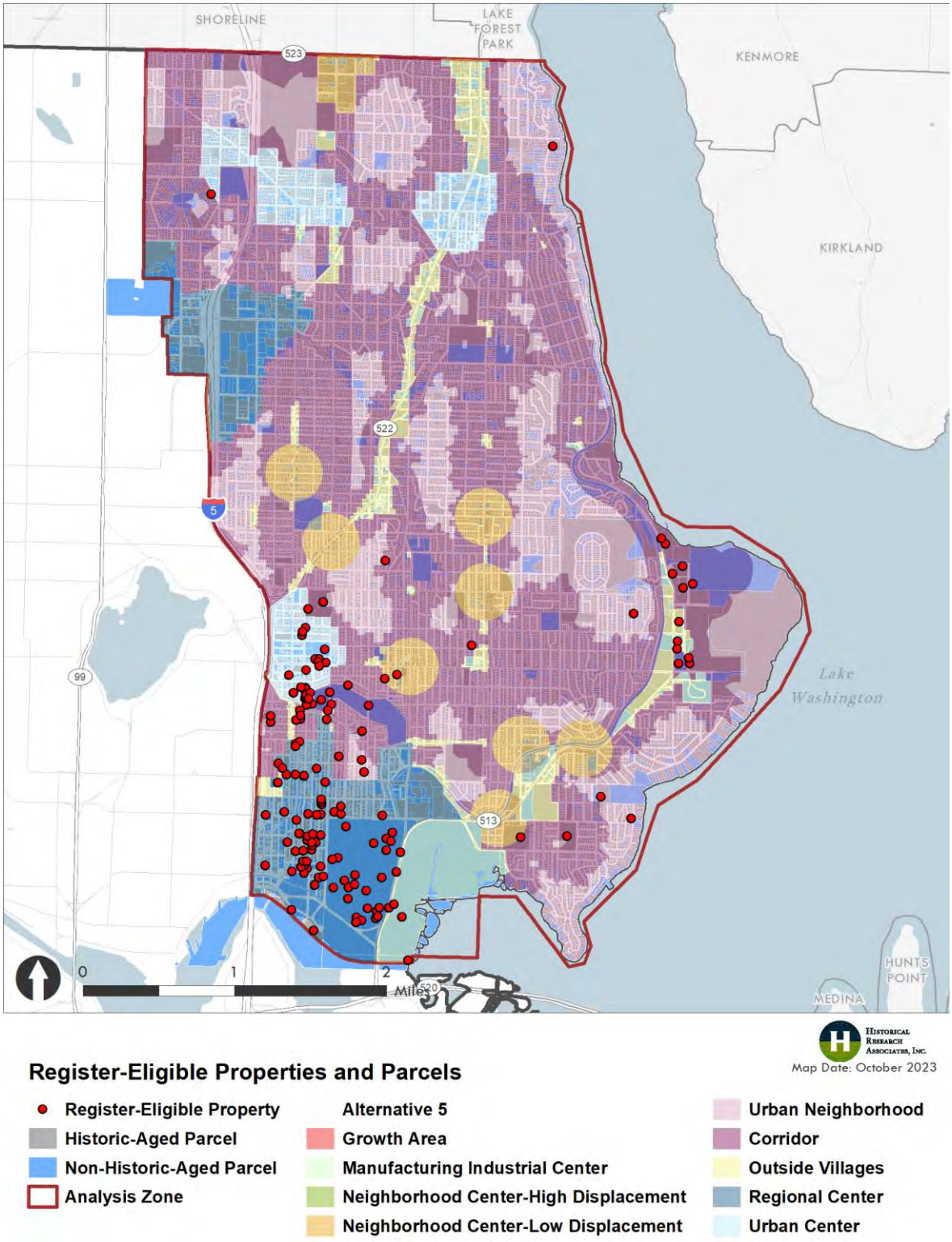
Source: HRA, 2023.

Exhibit 3.9-13. Area 2: NE Seattle—NRHP- and WHR-Listed Architectural Districts and Properties



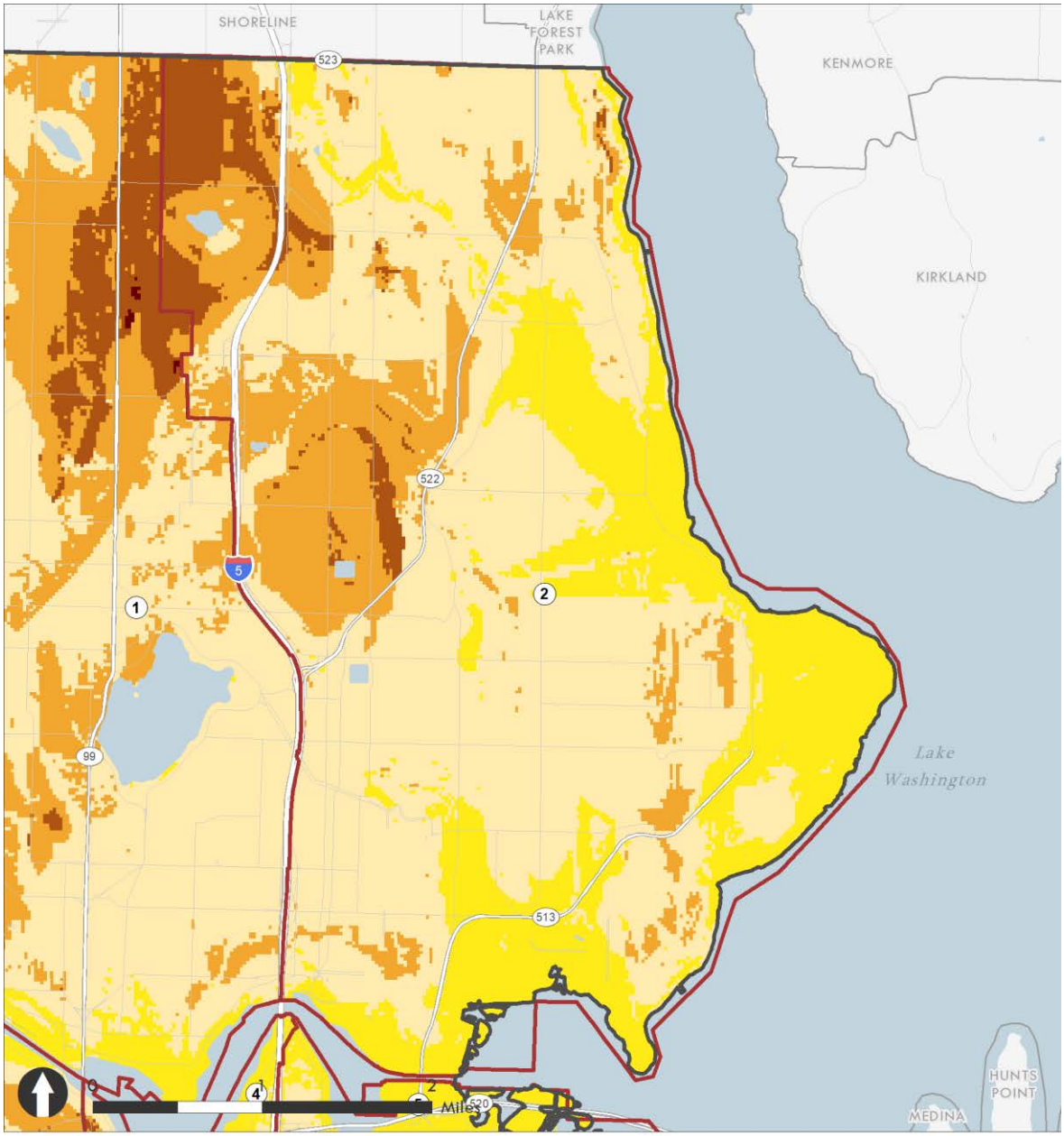
Notes: Map corrected since the Draft EIS. Nuclear Reactor Building at UW was listed in the National Register but it was demolished by UW in 2016. Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.
Source: HRA, 2024~~3~~.

Exhibit 3.9-14. Area 2: NE Seattle—Historic-Aged Parcels and NRHP-Eligible Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.
Source: HRA, 2023.

Exhibit 3.9-15. Area 2: NE Seattle—Map Showing Archaeological Sensitivity from DAHP Model



Source: HRA, 2023.

130th/145th Station Area

There are 3 designated Seattle Landmarks in the 130th/145th Station Area. The first is Ingraham High School, which was designated in 2017. Built in 1958, the school is significant under Standard D, for its Mid-Century Modern style school architecture. The second is Lake City School, which was designated in 2009. The school was built in 1931 and is significant under Standard C for its association with the heritage of the community, Standard D for its Georgian style architecture, and under Standard F as a prominent feature of the neighborhood. Finally, the third Seattle Landmark within the 130th/145th Station Area is Lake City Library. Built in 1965, the library is significant under Standard D, for its Mid-Century Modern style architecture, and under Standard E as an outstanding work of the architect, John Morse (**Exhibit 3.9-16**). There are no NRHP- or WHR-listed historic districts or individually listed resources found in the 130th/145th Station Area.

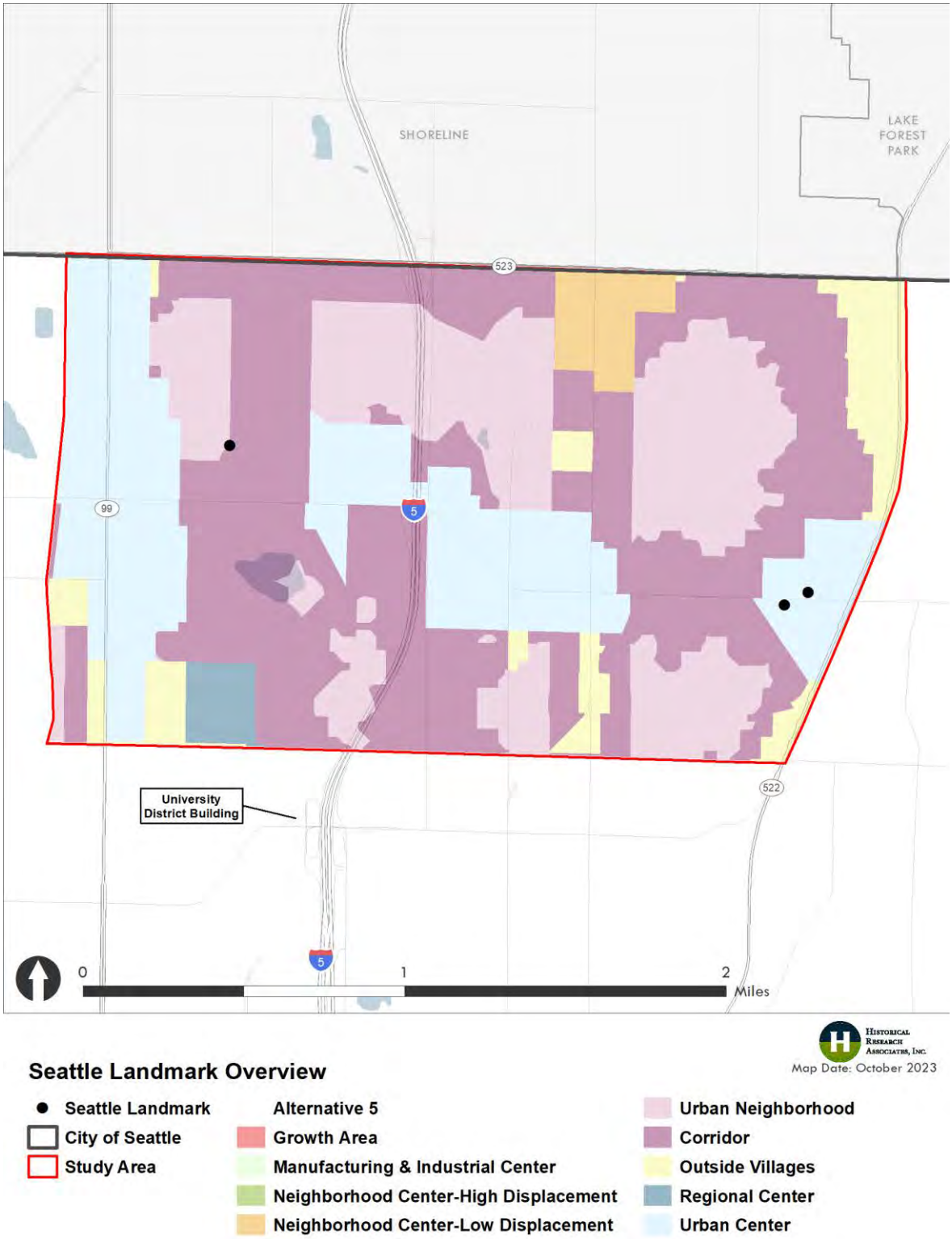
Current King County Tax Assessor records show that within the 130th/145th Station Areas, there are 5,260 historic-period buildings. Of these, 4,933 are residential, including 4,826 residential buildings (single family dwellings, townhouses, duplexes, triplexes, and fourplexes), 90 apartment buildings, and 17 condominiums. The remaining 327 buildings are commercial, industrial, and governmental (**Exhibit 3.9-17**).

In contrast, DAHP records show 3,789 individual historic-period architectural resources have been entered on HPI forms within the 130th/145th Station Areas. Of these, only 2 were determined NRHP-eligible by DAHP or a federal agency and are plotted on the map (**Exhibit 3.9-17**). Many of the 3,789 HPI forms were created by data transfer for an Assessors Data Project for King County. The resources in these HPIs were not formally surveyed and recorded, have neither eligibility recommendations nor determinations of eligibility, and the forms contain no survey data of any kind.

The discrepancy between the Assessor's and DAHP's records are likely in part due to demolitions that alter County Tax Assessor's records but do not change the records in DAHP's WISAARD database, and/or a lack of up-to-date survey and recordation of historic-period resources on HPI forms in WISAARD.

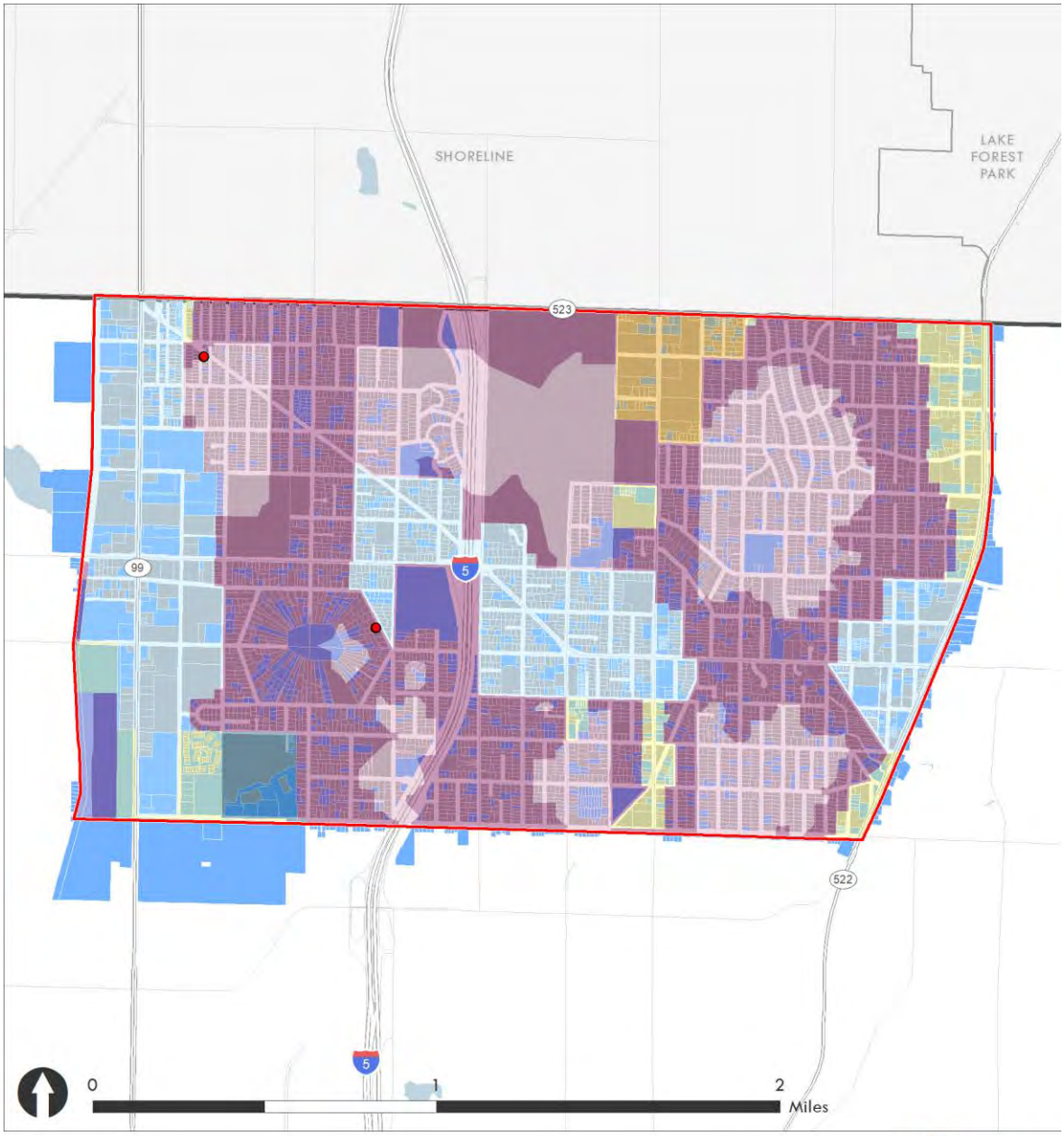
DAHP records show seven cultural resources studies that included archaeological resources investigations have been conducted within the 130th/145th Station Area since 1995. One historic-period site has been recorded within the 130th/145th Station Area. The site has not been formally evaluated for listing in the NRHP. Most of the eastern half of the 130th/145th Station Area is considered High to Very High Risk to contain precontact archaeological resources by DAHP's precontact archaeological site probability model. Areas of Moderately Low to Moderate Risk are primarily located in hilly upland settings across the western half of the 130th/145th Station Area (**Exhibit 3.9-18**).

Exhibit 3.9-16. Area 2: NE Seattle—Designated Seattle Landmarks



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.
Source: HRA, 2023.

Exhibit 3.9-17. Area 2: NE Seattle—Historic-Aged Parcels and NRHP-Eligible Resources



Historical Research Associates, Inc.
Map Date: October 2023

Register-Eligible Properties and Parcels

- Register-Eligible Property
- Historic-Aged Parcel
- Non-Historic-Aged Parcel
- Study Area

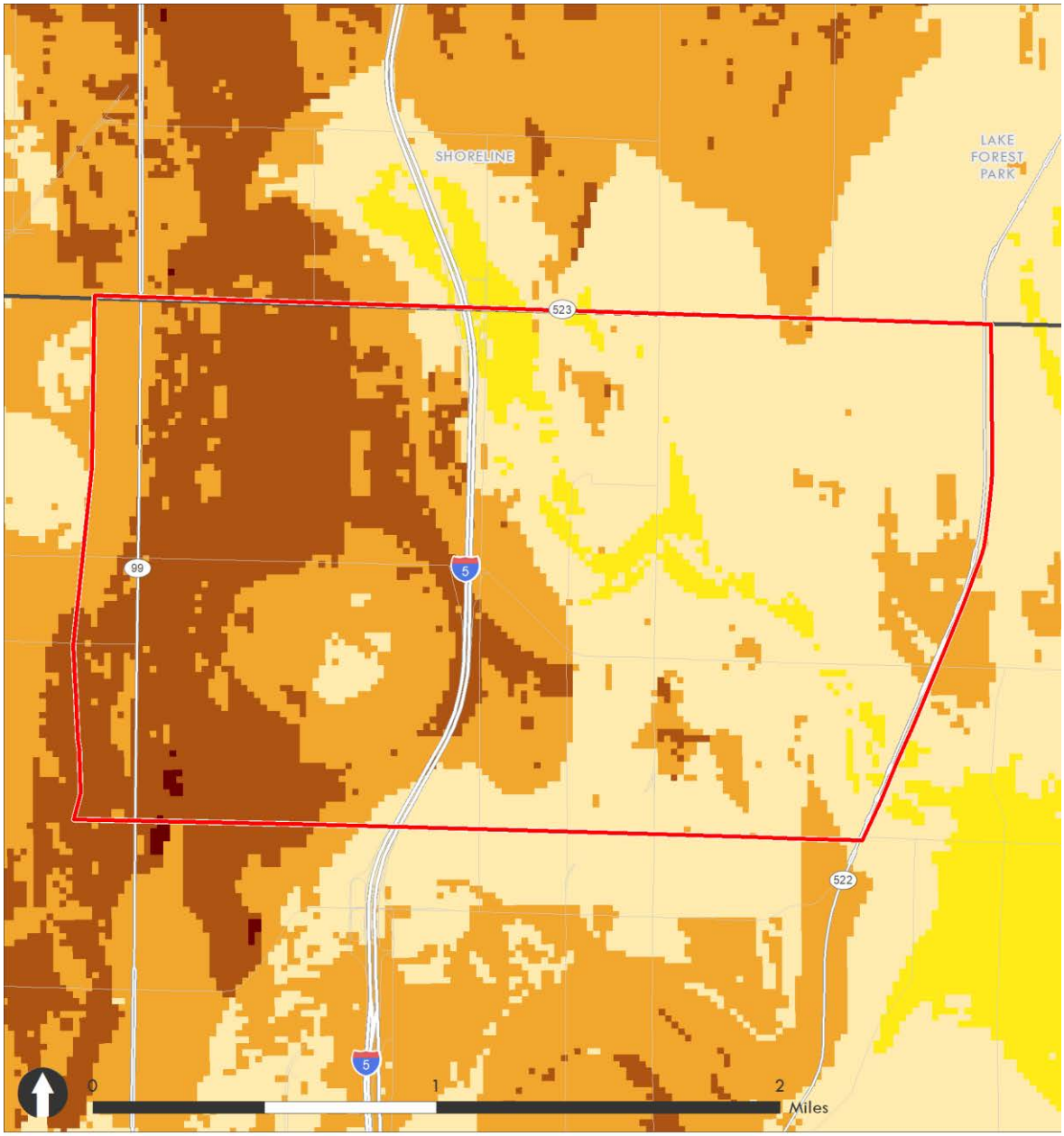
Alternative 5

- Growth Area
- Manufacturing Industrial Center
- Neighborhood Center-High Displacement
- Neighborhood Center-Low Displacement
- Urban Neighborhood
- Corridor
- Outside Villages
- Regional Center
- Urban Center

Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

Exhibit 3.9-18. Area 2: NE Seattle—Map Showing Archaeological Sensitivity from DAHP Model



Source: HRA, 2023.

Area 3: Queen Anne/Magnolia

There are 1 Seattle Landmark District and 3 NRHP-listed historic districts found in the Queen Anne/Magnolia analysis area. These resources are listed in the table below (**Exhibit 3.9-19**).

There are 59 designated Seattle Landmarks in the Queen Anne/Magnolia area. Of these, 25 are residential buildings, 5 are transportation-related, 4 are education-related buildings, 4 are commercial buildings, 3 are religious institutions, 2 are electrical power-related resources, 2 are former libraries, 2 are telephone-related buildings, 2 resources are Seattle World's fair-related, 2 are parks/gardens, 2 are bridges, 1 is a fire station, 1 is sports arena, 1 is a mural, 1 is a bell, 1 is a retaining wall, and 1 is a space needle. These resources are significant under a variety of the six standards for designation (**Exhibit 3.9-20**).

Exhibit 3.9-19. Area 3: Queen Anne/Magnolia—SL-designated and NRHP-listed Districts

Property Name, Type	Register/List Date/Significance	Period of Significance
Fort Lawton Landmark District, Historic District	SL / 1988 / Criterion A for Development of the City, Criterion C for Military, Criterion D for Architecture and Landscape	1898–1945
Fort Lawton, Historic District	NRHP / 1978, updated in 2008 / Criterion A for Military, and Criterion C for Architecture	1899–1945
Chittenden Locks and Lake Washington Ship Canal, Historic District	NRHP / 1978 / Criterion A for Commerce, Politics/Government, and Criterion C for Architecture, Engineering, and Landscape Architecture	1906–1917

Sources: DAHP, 2023.

There are 19 NRHP-listed resources and 4 WHR-listed resources within the Queen Anne/Magnolia area. Of the 23 individually listed resources, 6 are residential, 3 are commercial buildings, two are schools, 1 is a light station, 1 is an object, 1 is a Post Office, 1 is a library, 1 is a coliseum, 1 is a collegiate building, and 5 are bridges, which were listed in the NRHP under the *Historic Bridges and Tunnels in Washington State MPD,* and, finally, 1 is a Carnegie library, which was listed in the NRHP under the *Carnegie Libraries of Washington TR* (**Exhibit 3.9-21**).

Current King County Tax Assessor records show that within the Queen Anne/Magnolia area, there are 12,546 historic-period buildings. Of these, 11,083 are residential, including 10,285 residential buildings (single family dwellings, townhouses, duplexes, triplexes, and fourplexes), 622 apartment buildings, and 176 condominiums. The remaining 1,463 buildings are commercial, industrial, and governmental (**Exhibit 3.9-22**).

In contrast, DAHP records show 9,588 individual historic-period architectural resources have been entered on HPI forms within the Queen Anne/Magnolia area. Of these, only 120 were determined NRHP-eligible by DAHP or a federal agency and are plotted on the map (**Exhibit 3.9-22**). Most of the 9,588 HPI forms were created by data transfer for an Assessors Data Project for King County. The resources in these HPIs were not formally surveyed and recorded, have

neither eligibility recommendations nor determinations of eligibility, and the forms contain no survey data of any kind.

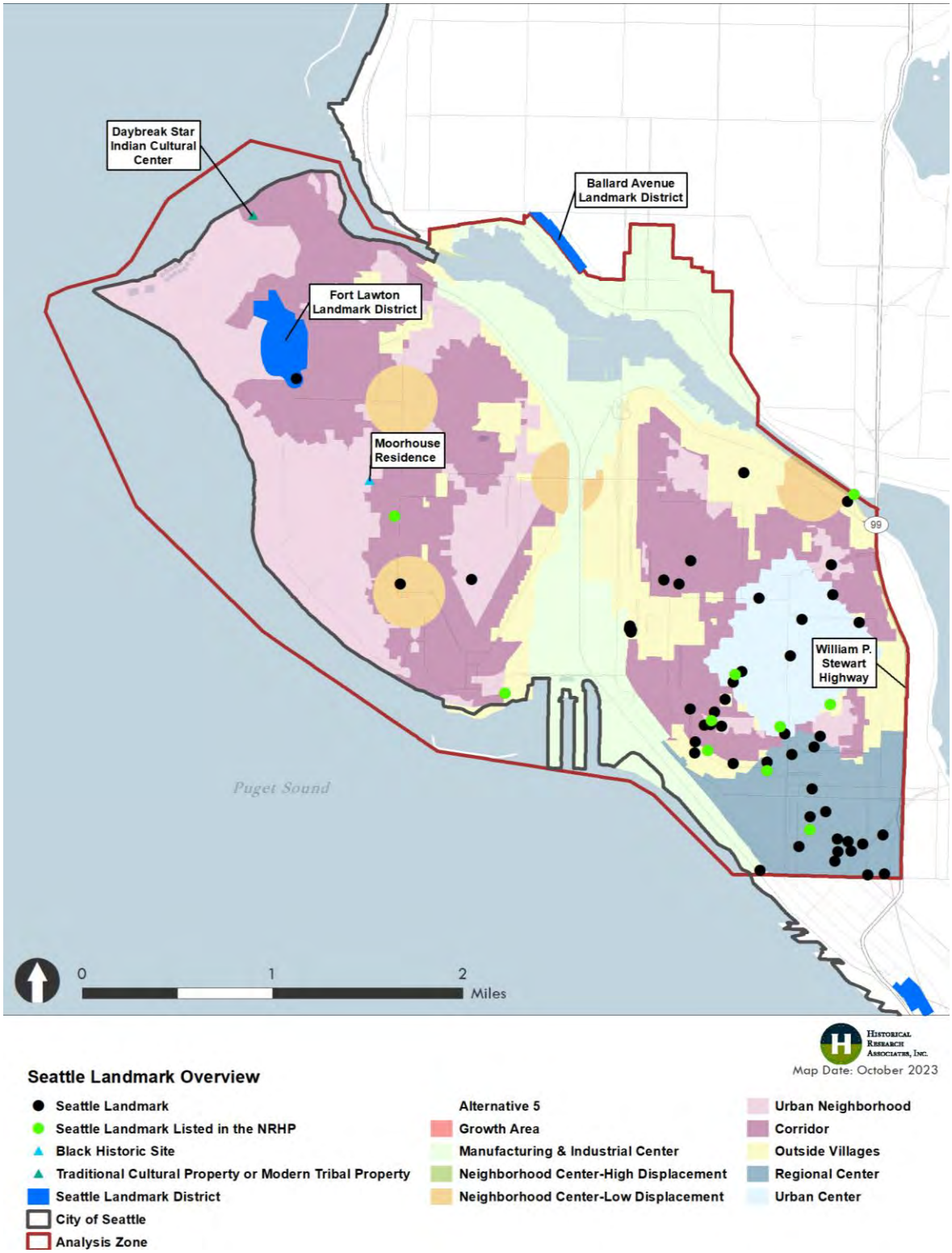
The discrepancy between the Assessor's and DAHP's records are likely in part due to demolitions that alter County Tax Assessor's records but do not change the records in DAHP's WISAARD database, and/or a lack of up-to-date survey and recordation of historic-period resources on HPI forms in WISAARD.

DAHP records show 43 cultural resources studies that included archaeological resources investigations that have been conducted within Analysis Zone 3 since 1995. Three precontact sites, ten historic-period sites, and one multicomponent site have been recorded within Analysis Zone 3. One of the precontact sites was determined eligible for listing in the NRHP, three of the historic-period sites were determined not eligible for listing in the NRHP, and the remaining ten sites have not been formally evaluated for listing in the NRHP. Most of the area within Analysis Zone 3 is considered of High or Very High Risk to contain precontact archaeological resources by DAHP's precontact archaeological site probability model. Areas of Moderately Low to Moderate Risk are located in a small upland portion of the Magnolia neighborhood and across much of the hilly Queen Anne neighborhood (**Exhibit 3.9-23**).

Culturally Important Resources

There are 1 Black Historic Site (Moorhouse Residence) and 1 Potential Black Commemorative Site (William P. Stewart Highway), within Analysis Zone 3 (**Exhibit 3.9-20**) (Source: the Washington State Black Historic Sites Survey).

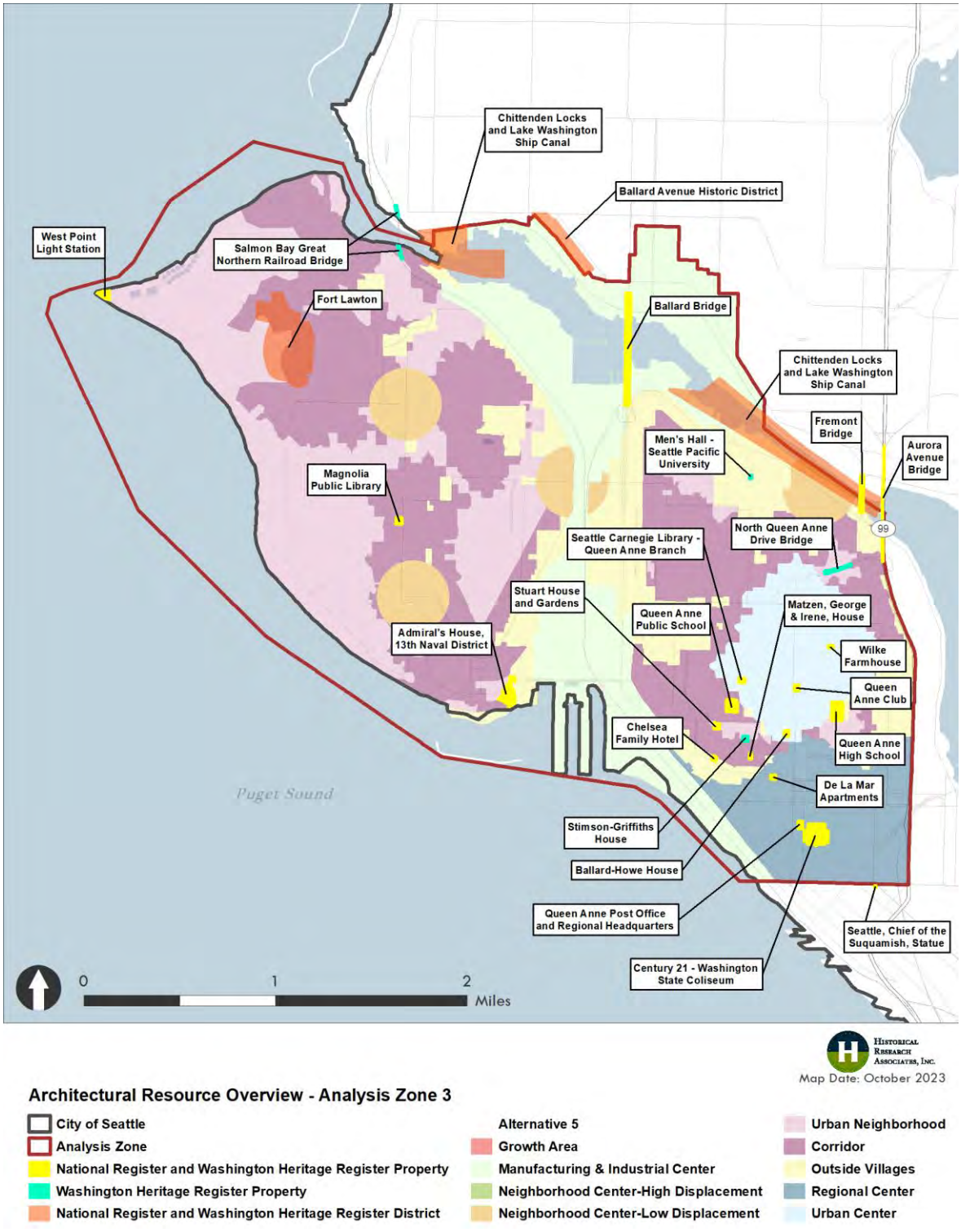
Exhibit 3.9-20. Area 3: Queen Anne/Magnolia—Designated Seattle Landmarks, Seattle Historic Districts, and Culturally Important Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

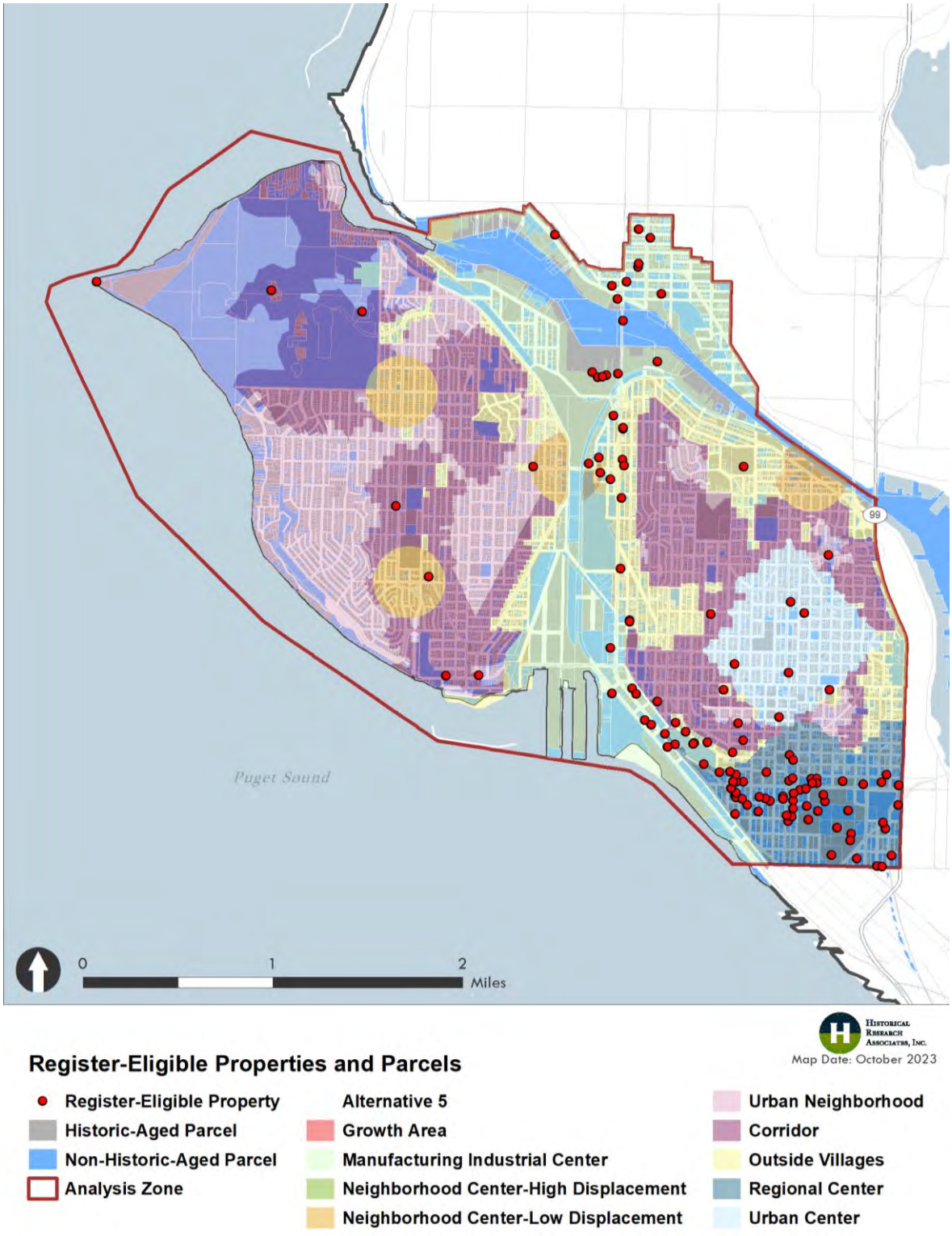
Exhibit 3.9-21. Area 3: Queen Anne/Magnolia—NRHP- and WHR-Listed Architectural Districts and Properties



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

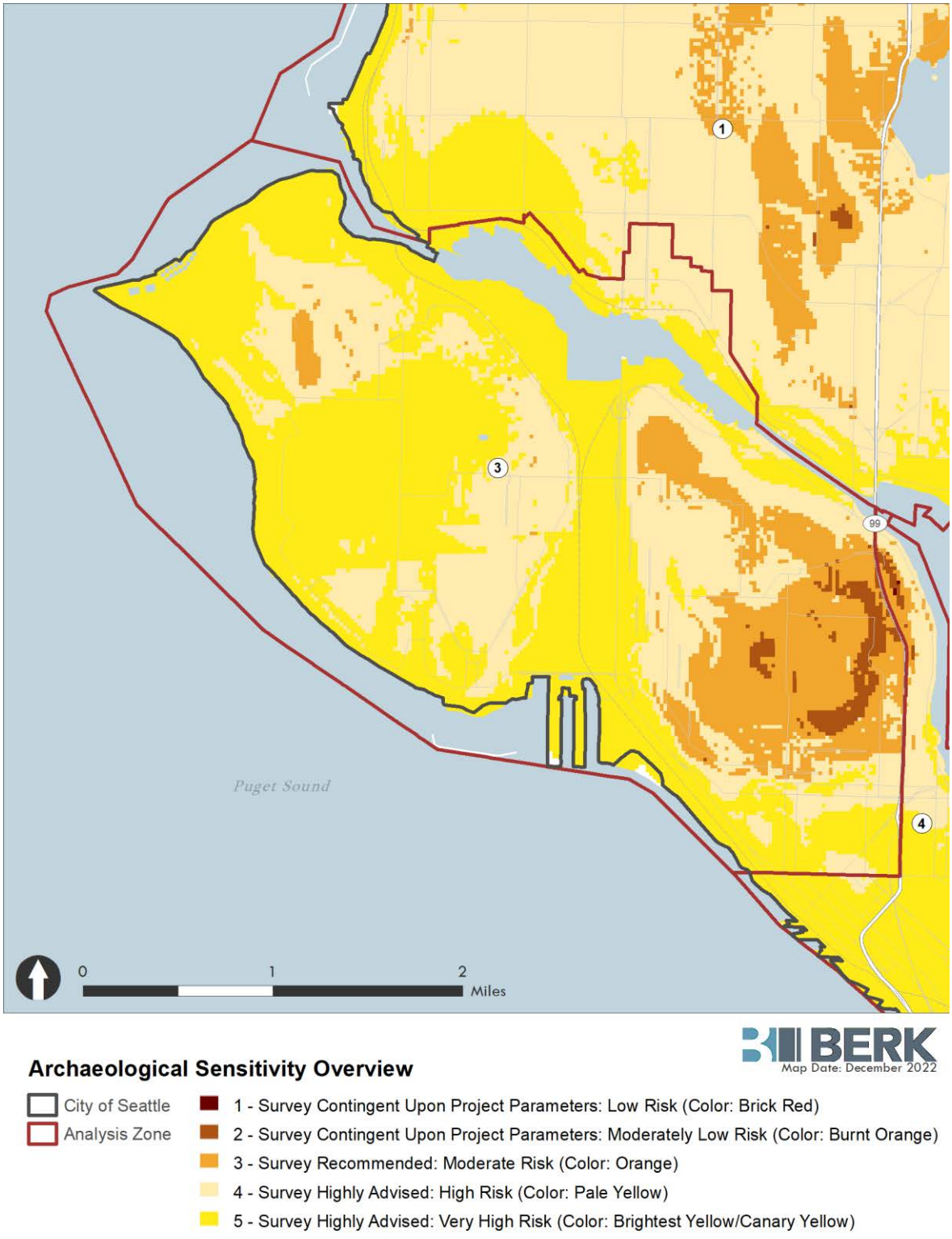
Exhibit 3.9-22. Area 3: Queen Anne/Magnolia—Historic-Aged Parcels and NRHP-Eligible Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

Exhibit 3.9-23. Area 3: Queen Anne/Magnolia—Map Showing Archaeological Sensitivity from DAHP Model



Source: HRA, 2023.

Area 4: Downtown/Lake Union

There are a very large number of historic properties and districts in the Downtown/Lake Union Area. Found in the Downtown/Lake Union analysis area are 3 Seattle Landmark Districts, 3 NRHP-listed historic districts, 1 WHR-listed historic district, and notably, there are 6 National Historic Landmarks, which are also listed in the NRHP. These resources (districts and NHLs) are listed in the table below (**Exhibit 3.9-24**).

There are 155 designated Seattle Landmarks in the Downtown/Lake Union area. Of these, 15 are residential buildings, 15 are transportation-related, 2 are education-related buildings, 77 are commercial buildings, 12 are hotels, 8 are maritime-related, 6 are fraternal organization/club buildings, 5 are street clocks, 3 are religious institutions, 2 are power-related resources, 3 are theater buildings, 2 are fire station buildings, 2 are memorial sculptures, 1 is a Naval armory, and 1 is a YMCA. These resources are significant under a variety of the six standards for designation (**Exhibit 3.9-25**).

Exhibit 3.9-24. Area 4: Downtown/Lake Union—SL-designated and NHL-listed Districts, and NHL-listed Properties

Property Name, Type	Register/List Date/Significance	Period of Significance
Pioneer Square Preservation District, District	SL / 1970 / Criterion A for the Development of Seattle, Criterion C for the Economic Heritage of Seattle, Puget Sound, and Washington, Criterion D for Architecture	1889–1931
Pioneer Square-Skid Road Historic District, (Including Boundary Increases), District	NRHP / 2008 / Criterion A for Community Planning and Development, Industry, Commerce, Transportation, Politics/Government, and Social History, and Criterion C for Architecture, Landscape Architecture, and Engineering	1889–1931
Pike Place Market Historical District, District	SL / 1971 / Criterion A for Development of Seattle, Criterion C for Cultural and Economic Heritage, Criterion D for Architecture, and Criterion F as a Distinctive Neighborhood Feature	1907–1971
Pike Place Public Market Historic District, District	NRHP / 2011 / Criterion A for Agriculture, Commerce, Politics/Government, and Ethnic Heritage, and Criterion C for Architecture	1907–1971
International Special Review District (ISRD), District	SL / 1973 / Criterion A for Development of Seattle, Criterion C for Economic Heritage of the Community and Culture, and Criterion D for Architecture	1910
Seattle Chinatown Historic District, District	NRHP / 1986 / Criterion A for Commerce, Social/Humanitarian, and Ethnic History	1907–1936
Tenas Chuck Houseboat Moorage Historic District, District	WHR / 2000 / Criterion A for Early Settlement and Community, and Criterion C for Land Use and Architecture/Engineering	1910–1965
Pioneer Building, Pergola, and Totem Pole—Seattle, District	NHL / 1977 / Criterion 1 for Social History, and Criterion 4 for Architecture	1875–1899, 1900–1924

Property Name, Type	Register/List Date/Significance	Period of Significance
Schooner *Adventuress,* Structure	NHL / 1989 / NHL Criterion 1 for Maritime History, and Criterion 4 for Naval Architecture	1914
Virginia V, Structure	NHL / 1992 / Criterion 1 for Maritime Transportation, and Criterion 4 for Architecture	1922–1944
Relief (Lightship), Structure	NHL / 1989 / Criterion 1 for Maritime Transportation, and Criterion 4 for Naval Architecture, Lightship	1905–1960
Duwamish, Structure	NHL / 1989 / Criterion 1 for Maritime Business, Shipping and Transportation, and Criterion 4 for Naval Architecture	1909–1949
Panama Hotel, Building	NHL / 2006 / Criterion 1 for Ethnic Heritage: Asian, and Criterion 4 for Architecture	1910–1942

Sources: DAHP, 2023.

There are 80 NRHP-listed resources and 20 WHR-listed resources within the Downtown/Lake Union area (for more information see the WISAARD map with the "Register Public" layer turned on, at https://wisaard.dahp.wa.gov/Map). As adding these resources to the table would create a table that spans a number of pages, they will be only briefly mentioned here. Of the 80 NRHP-listed resources, 30 are commercial buildings, 13 are hotels, 8 are ships/boats, 5 are apartment buildings, 5 are federal government-related buildings, 3 are transportation-related, 3 are churches, 3 are club facilities, 2 are theaters, 2 are art objects, 1 is a stables, 1 is a park, 1 is a YWCA, and 3 are bridges, which were listed in the NRHP under the *Historic Bridges and Tunnels in Washington State MPD*. Of the 20 WHR-listed resources, 15 are historic sites, 2 are ships, 1 is a school, 1 is a commercial block, and 1 is a park (**Exhibit 3.9-26**).

Current King County Tax Assessor records show that within the Downtown/Lake Union area, there are 1,711 historic-period buildings. Of these, 599 are residential, including 246 residential buildings (single family dwellings, townhouses, duplexes, triplexes, and fourplexes), 260 apartment buildings, and 93 condominiums. The remaining 1,112 buildings are commercial, industrial, and governmental (**Exhibit 3.9-27**).

In contrast, DAHP records show 1,853 individual historic-period architectural resources have been entered on HPI forms within the Downtown/Lake Union area. Of these, only 278 were determined NRHP-eligible by DAHP or a federal agency and are plotted on the map (**Exhibit 3.9-27**). Many of the 1,853 HPI forms were created by data transfer for an Assessors Data Project for King County. The resources in these HPIs were not formally surveyed and recorded, have neither eligibility recommendations nor determinations of eligibility, and the forms contain no survey data of any kind.

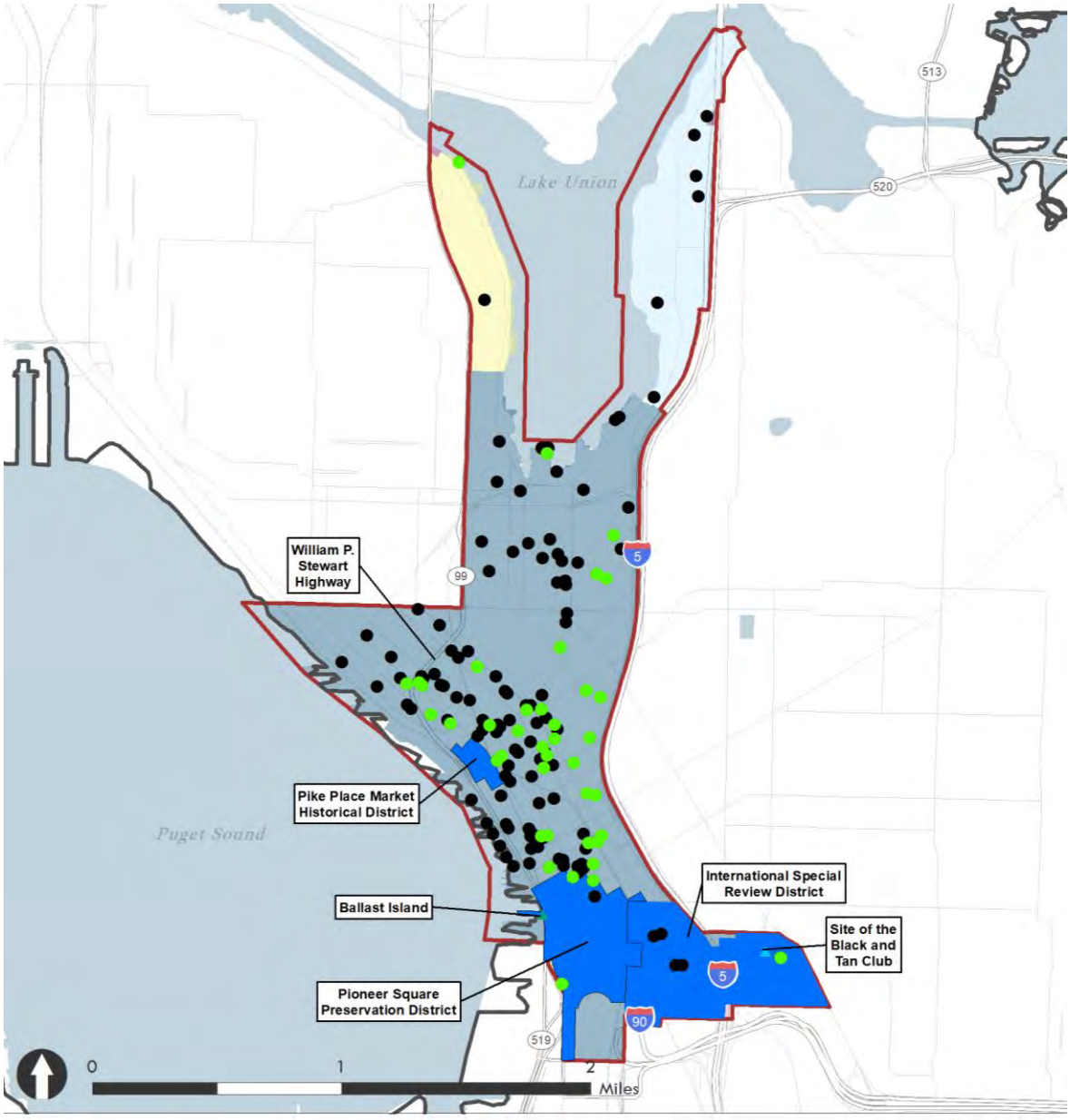
The discrepancy between the Assessor's and DAHP's records are likely in part due to demolitions that alter County Tax Assessor's records but do not change the records in DAHP's WISAARD database, and/or a lack of up-to-date survey and recordation of historic-period resources on HPI forms in WISAARD.

DAHP records show 81 cultural resources studies that included archaeological resources investigations that have been conducted within Analysis Zone 4 since 1995. Thirty-four historic-period sites and two multicomponent sites have been recorded within Analysis Zone 4. two of the historic-period sites are listed in the NRHP, two historic-period sites were determined eligible for listing in the NRHP, ten historic-period sites were determined not eligible for listing in the NRHP, and the remaining twenty-one sites have not been formally evaluated for listing in the NRHP. One of the NRHP-listed historic-period sites, Ballast Island, is a TCP (45KI1189) (Curti, et al. 2020). Nearly all of Analysis Zone 4 is considered of High or Very High Risk to contain precontact archaeological resources by DAHP's precontact archaeological site probability model. Small areas of Moderate Risk are located along I-5 east of the South Lake Union neighborhood (**Exhibit 3.9-28**).

Culturally Important Resources

There are 1 Black Historic Site (the site of the Black and Tan Club) and 1 Potential Black Commemorative Site (the William P. Stewart Highway), in Analysis Zone 4 (**Exhibit 3.9-25**) (Source: the Washington State Black Historic Sites Survey).

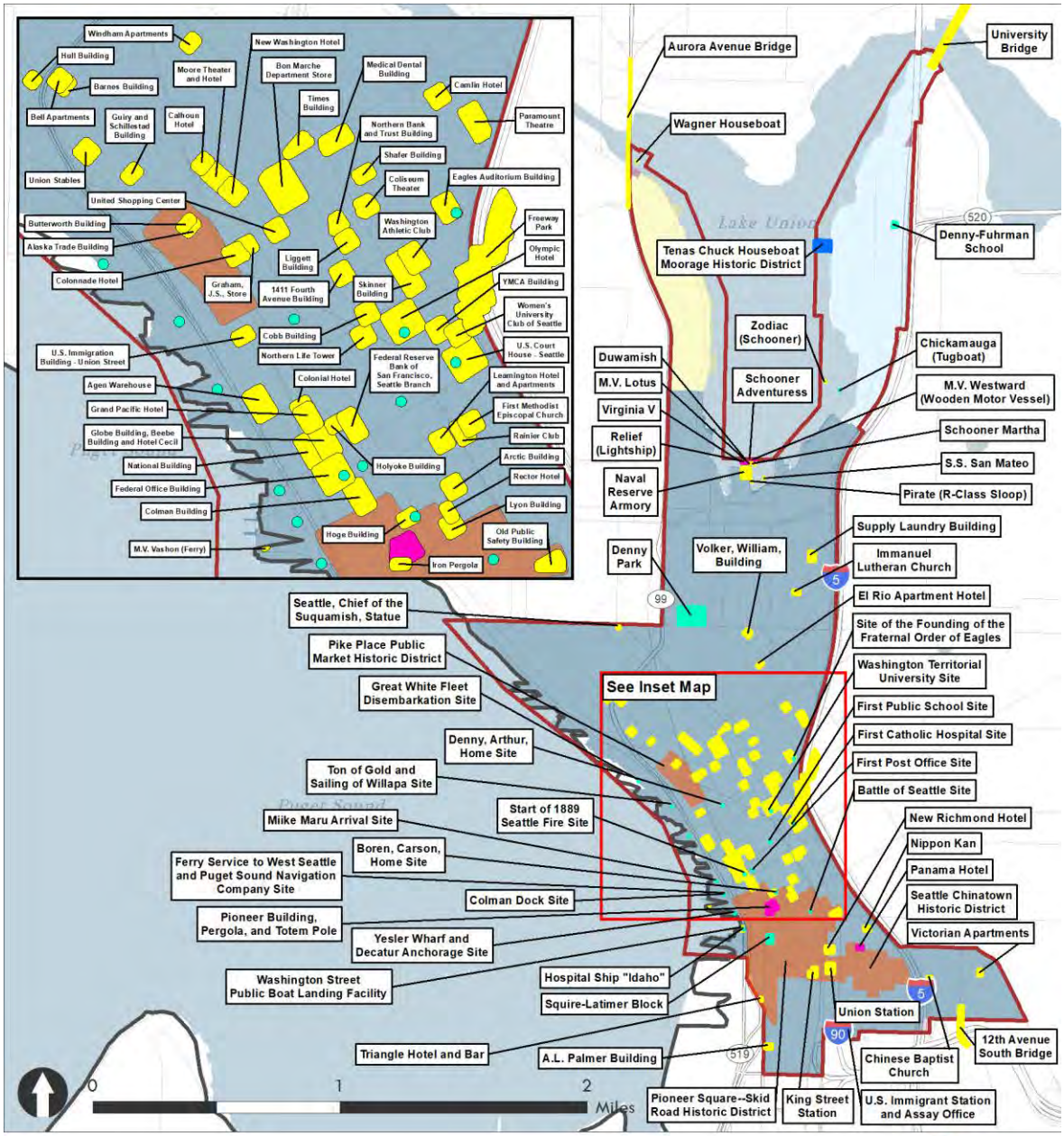
Exhibit 3.9-25. Area 4: Downtown/Lake Union—Designated Seattle Landmarks, Seattle Historic Districts, and Culturally Important Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

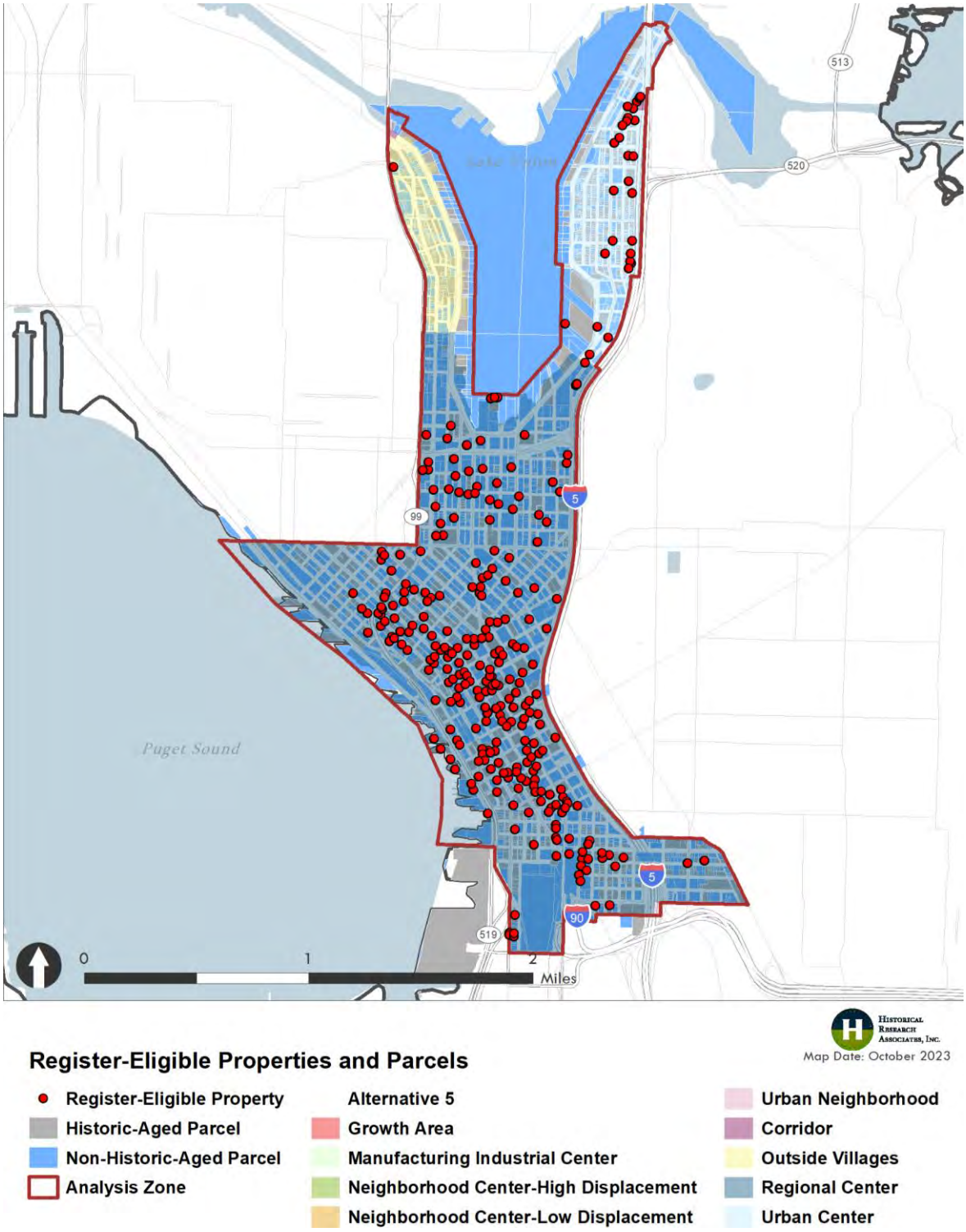
Exhibit 3.9-26. Area 4: Downtown/Lake Union—NHL-, NRHP- and WHR-Listed Architectural Properties and Districts



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

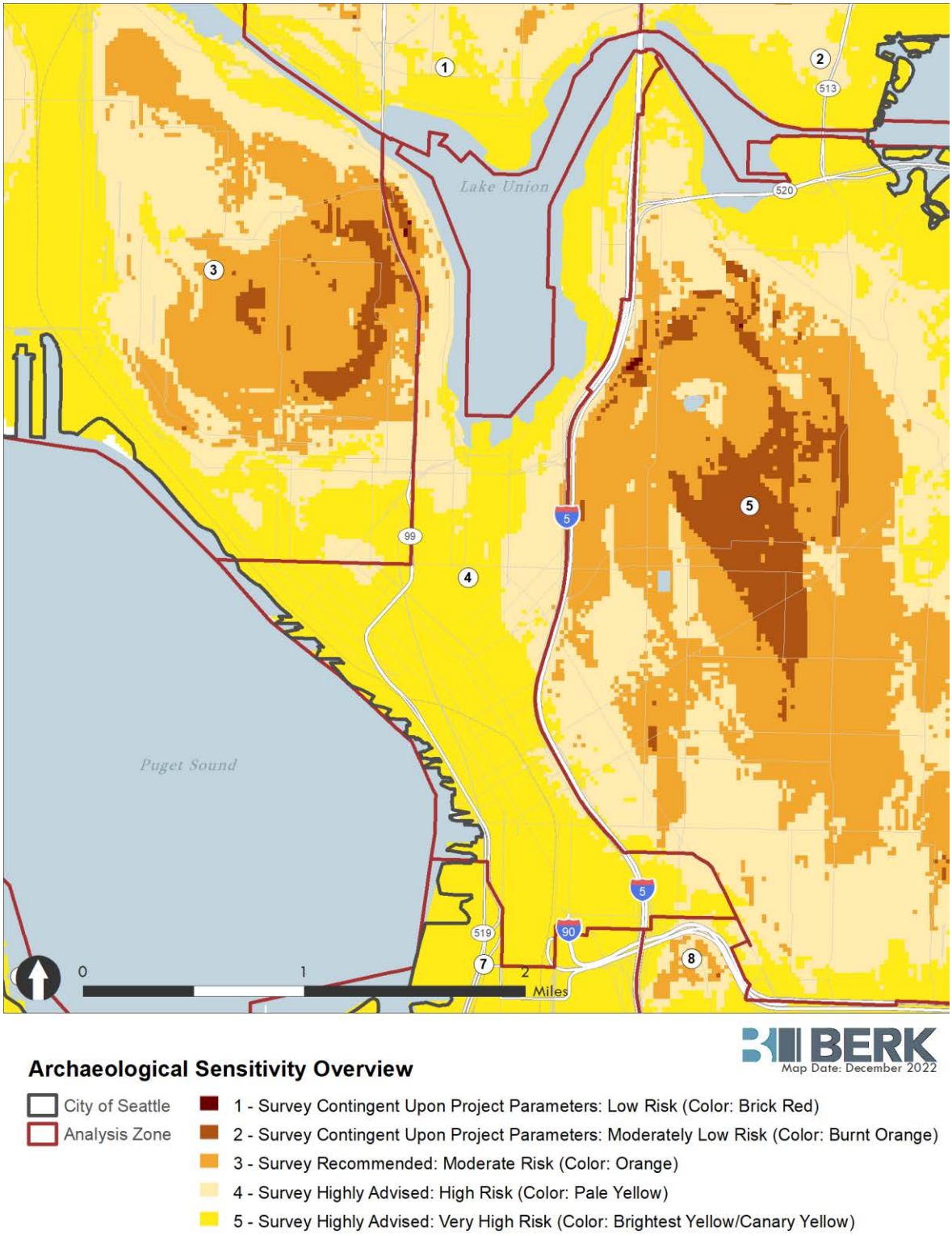
Source: HRA, 2023.

Exhibit 3.9-27. Area 4: Downtown/Lake Union—Historic-Aged Parcels and NRHP-Eligible Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.
Source: HRA, 2023.

Exhibit 3.9-28. Area 4: Downtown/Lake Union—Map Showing Archaeological Sensitivity from DAHP Model



Source: HRA, 2023.

Area 5: Capitol Hill/Central District

There are 1 Seattle Landmark district, 7 NRHP-listed historic districts, and 1 WHR-listed historic district located in the Capitol Hill/Central District analysis area. These resources are listed in the table below (**Exhibit 3.9-29**).

There are a large number of historic properties in the Capitol Hill/Central District. Adding these resources to the table would create a table that spans a number of pages, so they will be only briefly mentioned here. There are 117 designated Seattle Landmarks in the Capitol Hill/Central District area. Of these, 33 are residential buildings, 17 are religious institutions, 16 are Volunteer Park resources, 14 are apartment buildings, 9 are education-related buildings, 7 are clubs/community-related resources, 4 are fire stations, 3 are transportation-related buildings, 2 are medical buildings, 2 are hotels, 1 is a manufacturing building, 1 is a library, 1 is a garden, 1 is a bottling plant, 1 is a substation, 1 is a steam plant, 1 is a reservoir, 1 is a bike path, 1 is a bridge, and 1 is a stairway. These resources are significant under a variety of the six standards for designation (**Exhibit 3.9-30**).

Exhibit 3.9-29. Area 5: Capitol Hill/Central District—SL-designated, NRHP-, and WHR-listed Districts

Property Name, Type	Register/List Date/Significance	Period of Significance
Volunteer Park—Seattle, District	NRHP / 1976 / Criterion A for Community Planning, and Criterion C for Architecture, Landscape Architecture, and Engineering	1903–1912
Harvard-Belmont Landmark District, District	SL / 1980 / Criterion D for Architecture and Landscape Architecture	Ca. 1900–1940
Harvard-Belmont District, District	NRHP / 1982 / Criterion A for Education and Social History, and Criterion C for Architecture and Landscape Architecture	Ca. 1900–1930
Chittenden Locks and Lake Washington Ship Canal, District	NRHP / 1978 / Criterion A for Commerce, Politics/Government, and Criterion C for Architecture, Engineering, and Landscape Architecture	1906–1917
Roanoke Park Historic District, District	NRHP / 2009 / Criterion A for Commerce, Law, and Politics/Government, and Criterion C for Architecture	1899–1939
Lake Washington Boulevard, District	NRHP / 2017 / Criterion A for Community Planning and Development, Recreation and Culture, and Transportation, and Criterion C for Landscape Architecture	1904–1963
Montlake Historic District, District	NRHP / 2015 / Criterion C for Architecture	1904–1959
Millionaire's Row Historic District, District	NRHP / 2021 / Criterion A for Community Planning and Development, and Criterion C for Architecture	1902–1967
Row Houses on 23rd Avenue—Seattle, District	WHR / 1970 / Criterion A for Social History and Community Planning and Development, and Criterion C for Architecture	1893–1970

Sources: DAHP, 2023.

There are 46 individually listed resources within the area that are listed in the NRHP and 7 WHR-listed properties (for more information see the WISAARD map with the "Register Public" layer turned on). Of these 18 are residential buildings, 5 are religious facilities, 3 are apartment buildings, 3 are fire stations, 5 are club facilities, 3 are schools, 2 are parks, 1 is an assay office, 1 is a commercial building, 1 is a hotel, 1 is an art museum, and 3 are bridges, which were listed in the NRHP under the *Historic Bridges and Tunnels in Washington State MPD* (**Exhibit 3.9-31**).

Current King County Tax Assessor records show that within the Capitol Hill/Central District area, there are 14,100 historic-period buildings. Of these, 12,355 are residential, including 11,158 residential buildings (single family dwellings, townhouses, duplexes, triplexes, and fourplexes), 984 apartment buildings, and 213 condominiums. The remaining 1,745 buildings are commercial, industrial, and governmental (**Exhibit 3.9-32**).

In contrast, DAHP records show 11,887 individual historic-period architectural resources have been entered on HPI forms within the Capitol Hill/Central District area. Of these, only 399 were determined NRHP-eligible by DAHP or a federal agency and are plotted on the map (**Exhibit 3.9-32**). Many of the 11,887 HPI forms were created by data transfer for an Assessors Data Project for King County. The resources in these HPIs were not formally surveyed and recorded, have neither eligibility recommendations nor determinations of eligibility, and the forms contain no survey data of any kind.

The discrepancy between the Assessor's and DAHP's records are likely in part due to demolitions that alter County Tax Assessor's records but do not change the records in DAHP's WISAARD database, and/or a lack of up-to-date survey and recordation of historic-period resources on HPI forms in WISAARD.

DAHP records show 38 cultural resources studies that included archaeological resources investigations that have been conducted within Analysis Zone 5 since 1995. Three precontact sites and eleven historic-period sites have been recorded within Analysis Zone 5. One of the historic-period sites was determined eligible for listing in the NRHP, eight historic-period sites were determined not eligible for listing in the NRHP, and the remaining five sites have not been formally evaluated for listing in the NRHP. The shorelines, adjacent low-elevation areas, and much of the southwestern (i.e., the First Hill, Yesler Terrace, and Atlantic neighborhoods) and northwestern (i.e., Arboretum and Washington Park neighborhoods) portions of Analysis Zone 5 are considered of High or Very High Risk to contain precontact archaeological resources by DAHP's precontact archaeological site probability model. The remainder of Analysis Zone 5, including most of the Capitol Hill neighborhood and other upland areas, are considered of Moderately Low to Moderate Risk (**Exhibit 3.9-33**).

Culturally Important Resources

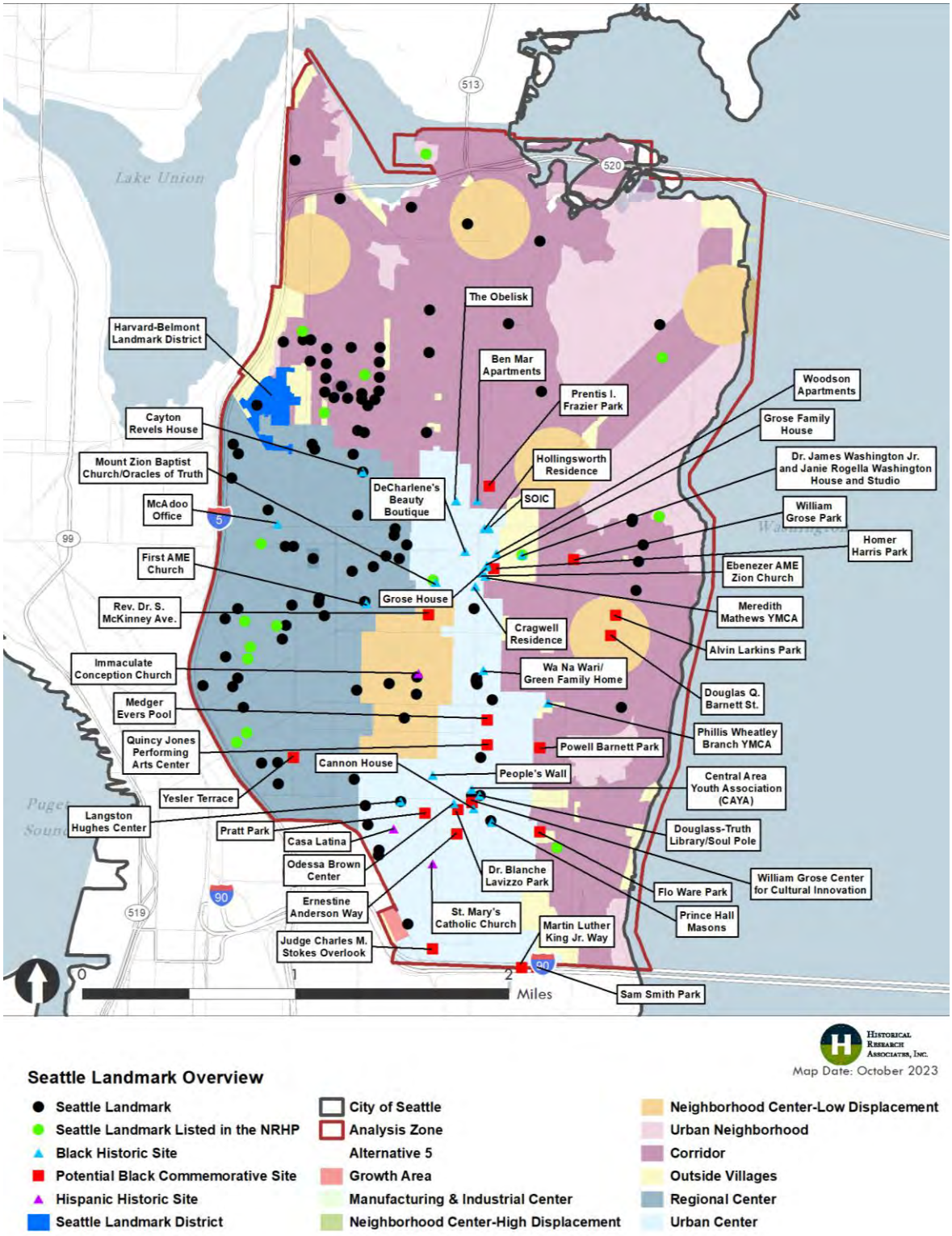
There are 25 Black Historic Sites in Analysis Zone 5, including the Ben Mar Apartments, Cannon House, Cayton Revels House (which is a designated SL), Central Area Youth Association (CAYA), Cragwell Residence, DeCharlene's Beauty Boutique, Douglass-Truth Library/Soul Pole (which is a designated SL), the Ebenezer AME Zion Church, First AME Church (which is a designated SL),

Grose House, Grose Family House, Hollingsworth Residence, Langston Hughes Center (which is a designated SL), Meredith Mathews YMCA, McAdoo Office, Mount Zion Baptist Church/Oracles of Truth (which is a designated SL), Odessa Brown Center, People's Wall, Prince Hall Masons (which is a designated SL), SOIC, The Obelisk, Wa Na Wari/Green Family Home, Dr. James Washington Jr. and Janie Rogella Washington House and Studio (which is a designated SL and listed in the NRHP), Phillis Wheatley Branch YWCA, and the Woodson Apartments (**Exhibit 3.9-30**) (Source: the Washington State Black Historic Sites Survey).

Additionally, there are 16 Potential Black Commemorative Sites, including Alvin Larkins Park, Flo Ware Park, Dr. Blanche Lavizzo Park, Homer Harris Park, Powell Barnett Park, Judge Charles M. Stokes Overlook, Pratt Park, Prentis I. Frazier Park, William Grose Park, Medgar Evers Pool, Ernestine Anderson Way, Rev. Dr. S. McKinney Avenue, Douglas Q. Barnett Street, Quincy Jones Performing Arts Center, Yesler Terrace, Sam Smith Park, Martin Luther King Jr. Way, and the William Grose Center for Cultural Innovation (**Exhibit 3.9-30**) (Source: the Washington State Black Historic Sites Survey).

There are 3 Hispanic Historic Sites in Analysis Zone 5, including the Immaculate Conception Church, Casa Latina, and St. Mary's Catholic Church (**Exhibit 3.9-30**) (Source: the 2018 Latino Heritage Survey).

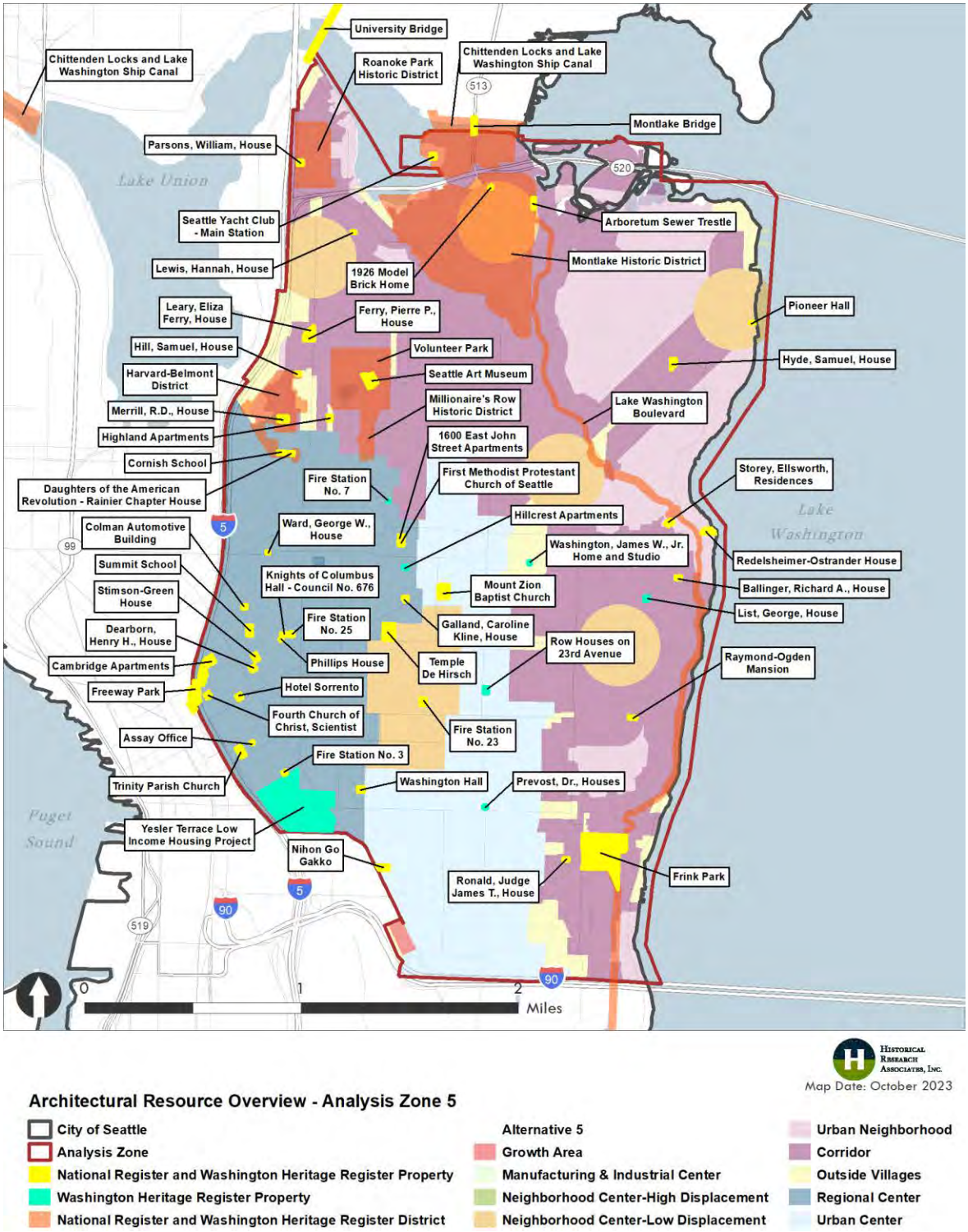
Exhibit 3.9-30. Area 5: Capitol Hill/Central District—Designated Seattle Landmarks, Seattle Historic Districts, and Culturally Important Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

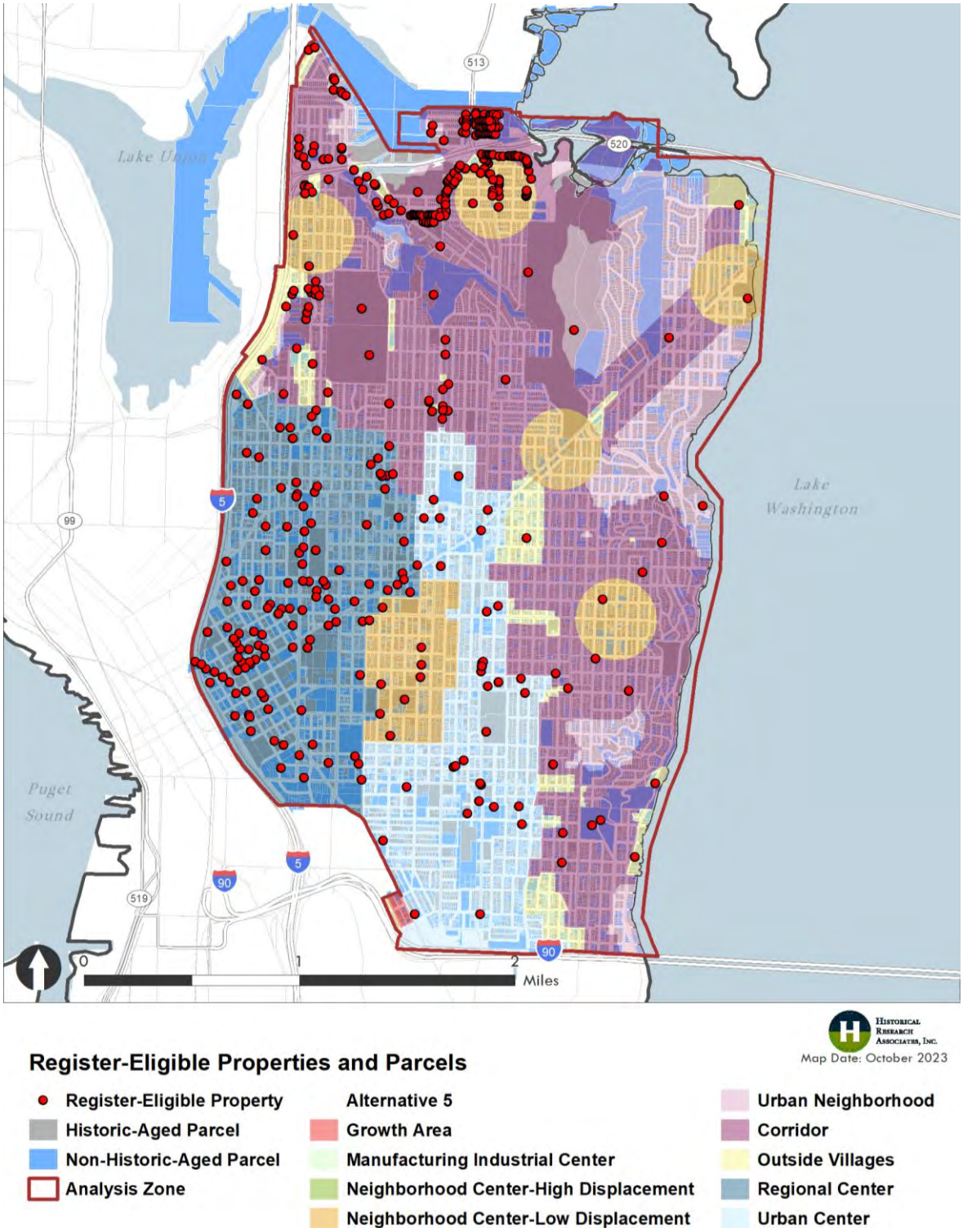
Exhibit 3.9-31. Area 5: Capitol Hill/Central District—NRHP- and WHR-Listed Architectural Properties and Districts



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

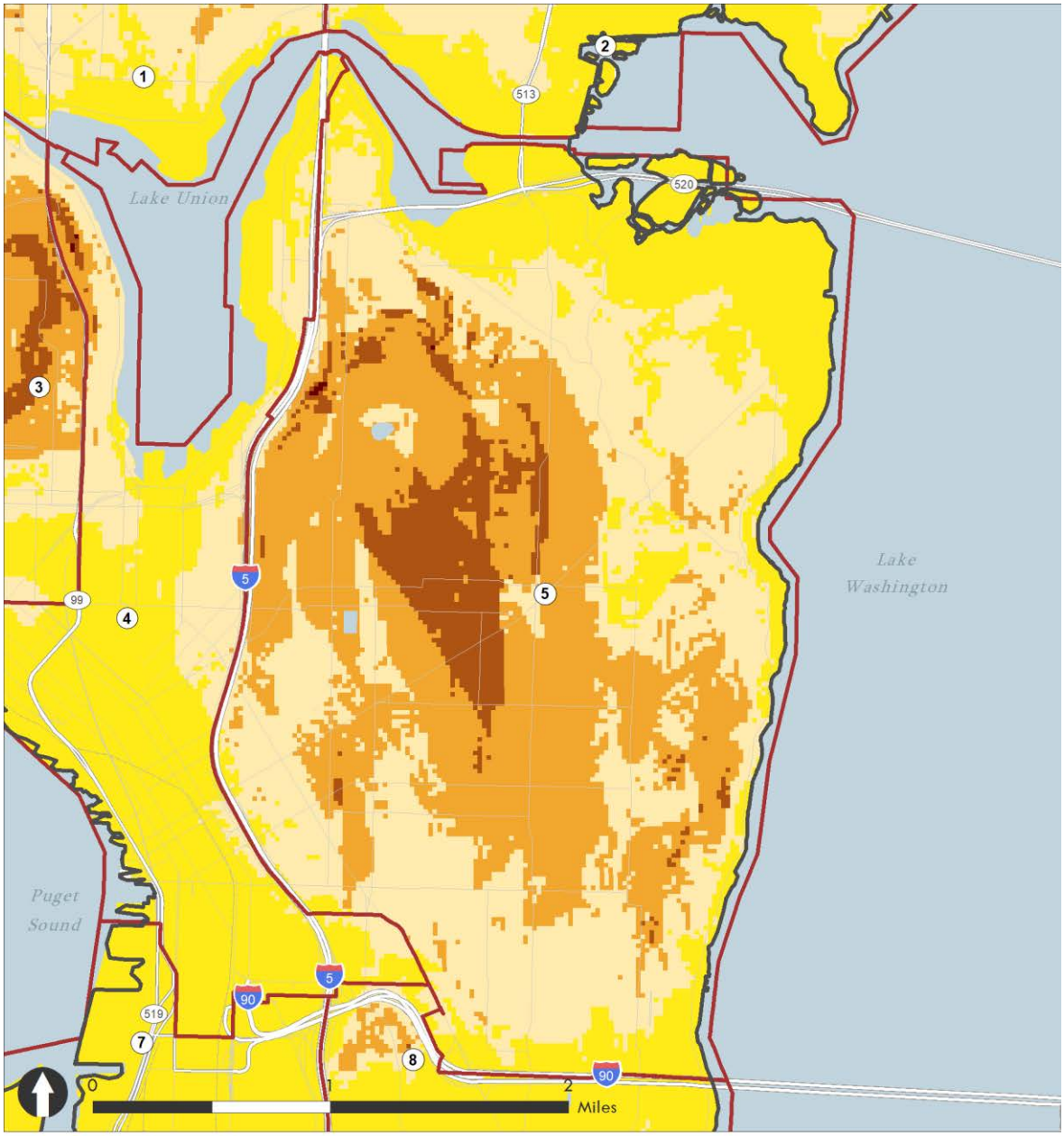
Exhibit 3.9-32. Area 5: Capitol Hill/Central District—Historic-Aged Parcels and NRHP-Eligible Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

Exhibit 3.9-33. Area 5: Capitol Hill/Central District—Map Showing Archaeological Sensitivity from DAHP Model



Source: HRA, 2023.

Area 6: West Seattle

Within the West Seattle analysis area, there are a large number of designated Seattle Landmarks. There are no SL-designated or NRHP- or WHR-listed historic districts in the area. As there only a few NRHP- and WHR-listed properties, these resources are listed in the table below (**Exhibit 3.9-34**).

There are 24 designated Seattle Landmarks in the West Seattle area. Of these, 6 are residential buildings, 5 are education-related buildings, 5 are commercial buildings, 2 are parks, 2 are religious institutions, 1 is a library, 1 is a theater, 1 is a fire station, and 1 is a bridge. These resources are significant under a variety of the six standards for designation (**Exhibit 3.9-35**).

Exhibit 3.9-34. Area 6: West Seattle—NRHP- and WHR-listed Properties

Property Name, Type	Register/List Date/Significance	Period of Significance
Seattle Carnegie Library—West Seattle Branch, Building	NRHP / 1982 / Criterion A for Education and Social History, and Criterion C for Architecture	1910
Schmitz Park Bridge, Structure	NRHP / 1982 / Criterion C for Engineering	1936
Frank B. Cooper Elementary School, Building	NRHP / 2003 / Criterion A for Education and Ethnic Heritage—African American, Criterion B for its association with Thelma Fisher Dewitty, and for Criterion C for Architecture	1917–1953
Fir Lodge, Building	NRHP / 2020 / Criterion A for Community Planning and Development, and Criterion C for Architecture	1903–1970
Alki Point and Duwamish Head, Site	WHR / 1970 / Criterion A for Education, Conservation, Science, and Urban Planning	1851–present

Sources: DAHP, 2023.

As noted in the table above, within the West Seattle analysis area there are 4 NRHP-listed resources and 1 WHR-listed resource. Of these, 1 is a bridge, which was listed in the NRHP under the *Historic Bridges and Tunnels in Washington State MPD,* and 1 is a Carnegie library, which was listed in the NRHP under the *Carnegie Libraries of Washington TR* (**Exhibit 3.9-36**).

Current King County Tax Assessor records show that within the West Seattle area, there are 22,764 historic-period buildings. Of these, 21,843 are residential, including 21,373 residential buildings (single family dwellings, townhouses, duplexes, triplexes, and fourplexes), 396 apartment buildings, and 74 condominiums. The remaining 921 buildings are commercial, industrial, and governmental (**Exhibit 3.9-37**).

In contrast, DAHP records show 16,777 individual historic-period architectural resources have been entered on HPI forms within the West Seattle area. Of these, only 48 were determined NRHP-eligible by DAHP or a federal agency and are plotted on the map (**Exhibit 3.9-37**). Many of the 16,777 HPI forms were created by data transfer for an Assessors Data Project for King

County. The resources in these HPIs were not formally surveyed and recorded, have neither eligibility recommendations nor determinations of eligibility, and the forms contain no survey data of any kind.

The discrepancy between the Assessor's and DAHP's records are likely in part due to demolitions that alter County Tax Assessor's records but do not change the records in DAHP's WISAARD database, and/or a lack of up-to-date survey and recordation of historic-period resources on HPI forms in WISAARD.

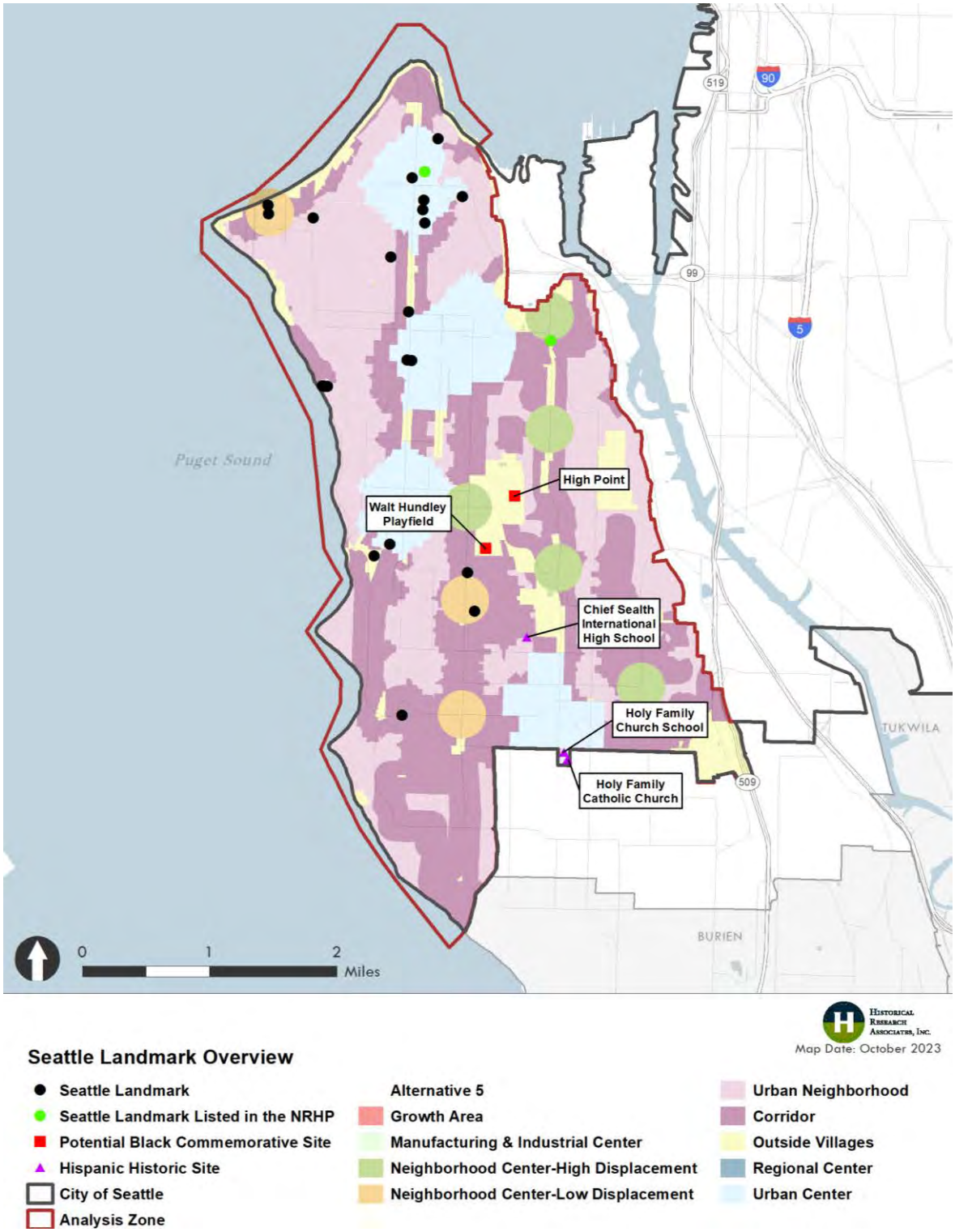
DAHP records show 33 cultural resources studies that included archaeological resources investigations that have been conducted within Analysis Zone 6 since 1995. Two precontact sites, six historic-period sites, and one multicomponent site have been recorded within Analysis Zone 6. One of the historic-period sites was determined not eligible for listing in the NRHP and the remaining eight sites have not been formally evaluated for listing in the NRHP. Most of Analysis Zone 6 is considered of High or Very High Risk to contain precontact archaeological resources by DAHP's precontact archaeological site probability model. Areas of Moderately Low to Moderate Risk are primarily located in upland settings in the central and southern portions of Analysis Zone 6 (**Exhibit 3.9-38**).

Culturally Important Resources

There are 2 Potential Black Commemorative Sites in Analysis Zone 6, including Walt Hundley Playfield and High Point neighborhood (**Exhibit 3.9-35**) (Source: the Washington State Black Historic Sites Survey).

There are 3 Hispanic Historic Sites in Analysis Zone 6, including Chief Sealth International High School, Holy Family Church School, and the Holy Family Catholic Church (**Exhibit 3.9-35**) (Source: the 2018 Latino Heritage Survey).

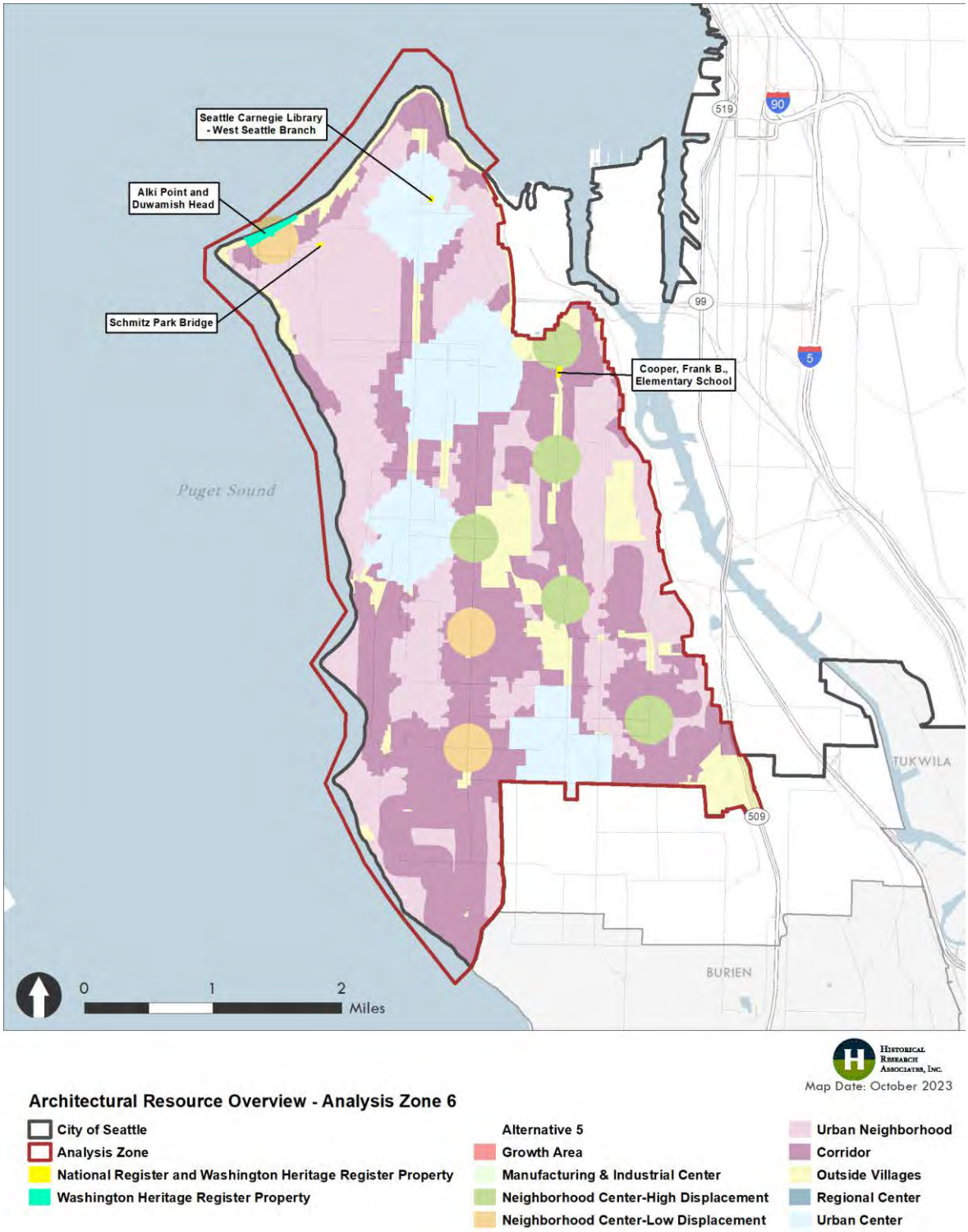
Exhibit 3.9-35. Area 6: West Seattle—Designated Seattle Landmarks, Seattle Historic Districts, and Culturally Important Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

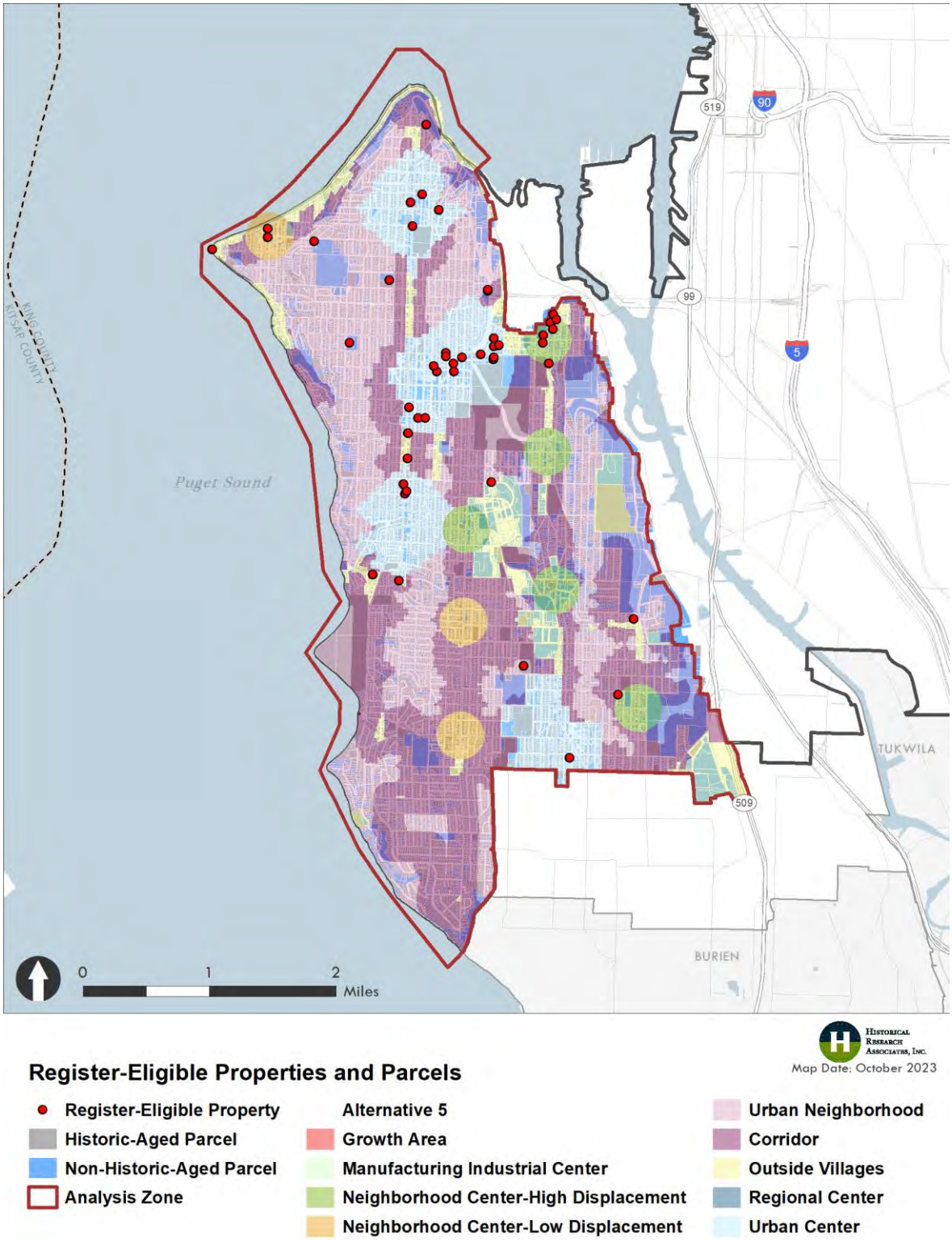
Source: HRA, 2023.

Exhibit 3.9-36. Area 6: West Seattle—NRHP- and WHR-Listed Architectural Properties and Districts



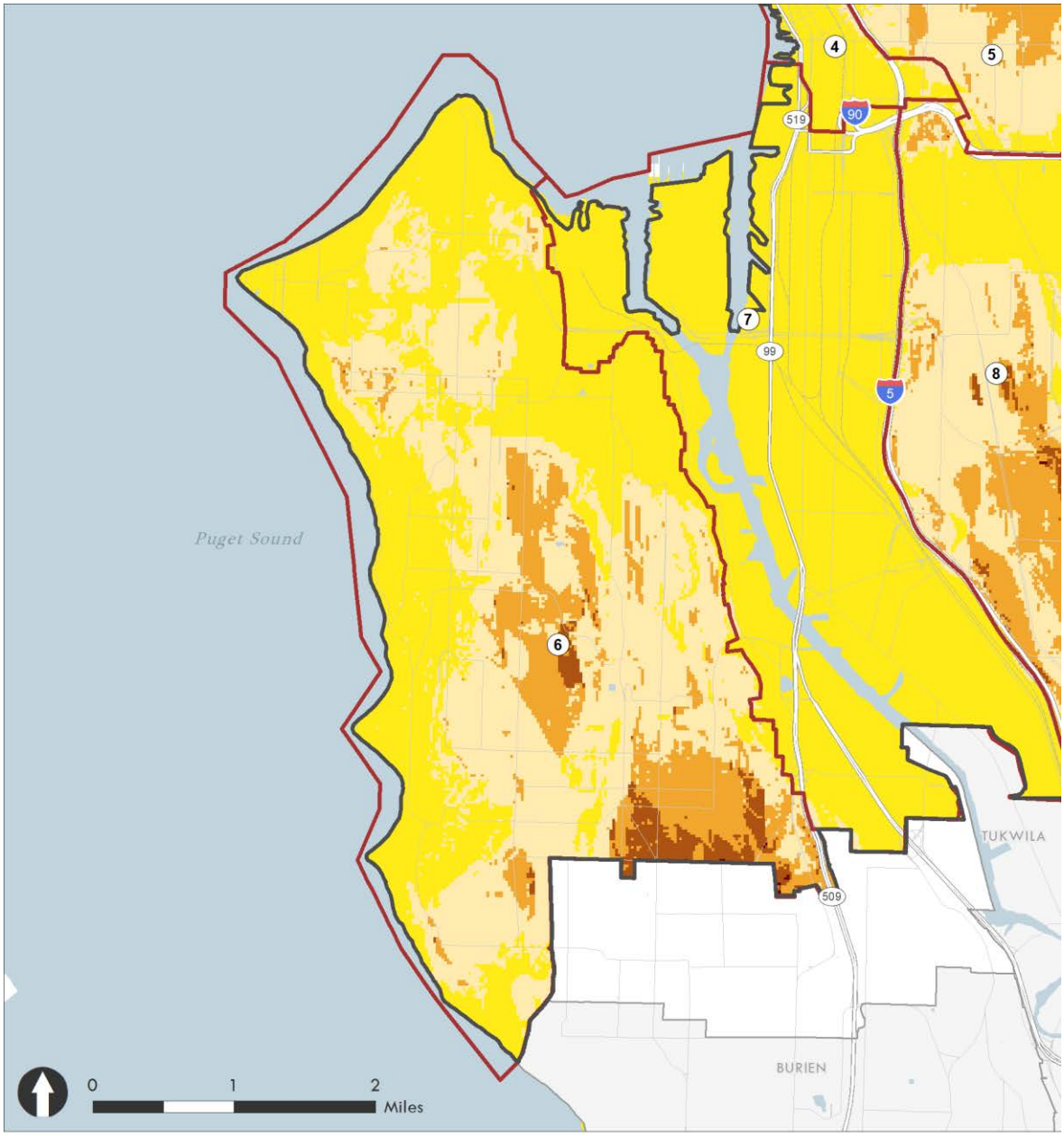
Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.
Source: HRA, 2023.

Exhibit 3.9-37. Area 6: West Seattle—Historic-Aged Parcels and NRHP-Eligible Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.
Source: HRA, 2023.

Exhibit 3.9-38. Area 6: West Seattle—Map Showing Archaeological Sensitivity from DAHP Model



Source: HRA, 2023.

Area 7: Duwamish

Within the Duwamish analysis area, there are a large number of designated Seattle Landmarks, but there are no Seattle Landmark districts. As there are only a few National Historic Landmark, NRHP- and WHR-listed properties, these resources are listed in the table below (**Exhibit 3.9-39**).

There are 14 designated Seattle Landmarks in the Duwamish area. Of these, 6 are related to the Rainier Cold Storage & Ice/Seattle Brewing & Malting Company, 2 are fire stations, 2 are related to the Georgetown Steam Plant, 1 is a gas station, 1 is an educational facility, 1 is a residential building, and 1 is a railroad bridge. These resources are significant under a variety of the six standards for designation (**Exhibit 3.9-40**).

Exhibit 3.9-39. Area 7: Duwamish—NHL-listed Properties, and NRHP- and WHR-listed Districts and Properties

Property Name, Type	Register/List Date/Significance	Period of Significance
Seattle Electric Company Georgetown Steam Plant, Building	NHL / 1984 / Criterion C for Engineering	1906–1908, 1917
Pioneer Square--Skid Road Historic District (Including Boundary Increases), District	NRHP / 2008 / Criterion A for Community Planning and Development, Industry, Commerce, Transportation, Politics/Government, and Social History, and Criterion C for Architecture, Landscape Architecture, and Engineering	1889–1931
Triangle Hotel and Bar, Building	NRHP / 1976 / Criterion A for Commerce, and Criterion C for Architecture	1909–1910
Old Georgetown City Hall, building	NRHP / 1983 / Criterion A for Politics/Government	1909
A.L. Palmer Building, Building	NRHP / 2008 / Criterion A for Commerce and Industry, Criterion B for its association with Alfred L. Palmer, and Criterion C for Architecture	1910
Bay View Brewery, Building	NRHP / 2013 / Criterion A for Industry and Commerce, Criterion B for its association with Andrew Hemrich and Emil Sick, and Criterion C for Architecture	1886–1962
Ford Motor Company Assembly Plant, Building	NRHP / 2013 / Criterion A for Industry, and Criterion C for Architecture	1932
U.S.S. Nebraska Launching (Skinner and Eddy Shipyard), Site	WHR / 1974 / Criterion A for Industry, Transportation, Maritime History, and Military (Naval History)	1904, 1916–1920
First Service Station Site—Seattle, Site	WHR / 1970 / Criterion A for Commerce, Industry, and Transportation	1907
Maple Donation Claim, Site	WHR / 1970 / Criterion A for Local History (Settlement)	1851
Gorst Field, Site	WHR / 1970 / Criterion A for Industry, Commerce, and Transportation, and Criterion C for Engineering	Ca. 1920

Sources: DAHP, 2023.

As noted in the table above, there are 1 National Historic Landmark, which is also listed in the NRHP, 1 NRHP-listed historic district, 5 individually NRHP-listed resources, and 4 WHR-listed resources found in the Duwamish analysis area (**Exhibit 3.9-41**).

Current King County Tax Assessor records show that within the Duwamish area, there are 2,115 historic-period buildings. Of these, 1,052 are residential, including 994 residential buildings (single family dwellings, townhouses, duplexes, triplexes, and fourplexes), 55 apartment buildings, and 3 condominiums. The remaining 1,063 buildings are commercial, industrial, and governmental (**Exhibit 3.9-42**).

In contrast, DAHP records show 2,217 individual historic-period architectural resources have been entered on HPI forms within the Duwamish area. Of these, only 84 were determined NRHP-eligible by DAHP or a federal agency and are plotted on the map (**Exhibit 3.9-42**). Many of these HPI forms were created by data transfer for an Assessors Data Project for King County. The resources in these HPIs were not formally surveyed and recorded, have neither eligibility recommendations nor determinations of eligibility, and the forms contain no survey data of any kind.

The discrepancy between the Assessor's and DAHP's records are likely in part due to demolitions that alter County Tax Assessor's records but do not change the records in DAHP's WISAARD database, and/or a lack of up-to-date survey and recordation of historic-period resources on HPI forms in WISAARD.

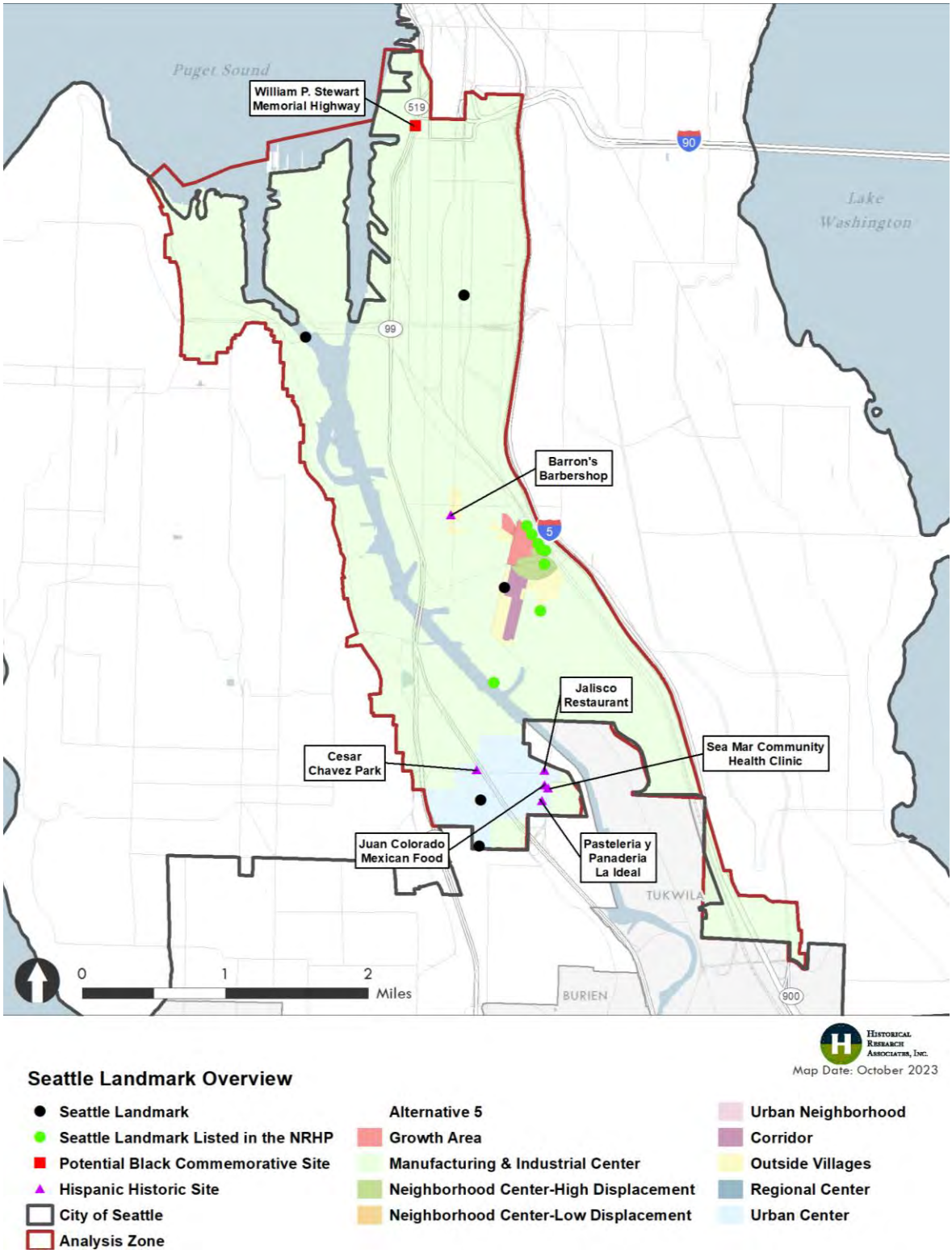
DAHP records show 70 cultural resources studies that included archaeological resources investigations that have been conducted within Analysis Zone 7 since 1995. Seven precontact sites, twenty-nine historic-period sites, and one multicomponent site have been recorded within Analysis Zone 7. One of the precontact sites is listed in the NRHP, one of the precontact sites was determined eligible for listing in the NRHP, nine of the historic-period sites were determined not eligible for listing in the NRHP, and the remaining twenty-six sites have not been formally evaluated for listing in the NRHP. All of Analysis Zone 7 is considered of Very High Risk to contain precontact archaeological resources by DAHP's precontact archaeological site probability model (**Exhibit 3.9-43**).

Culturally Important Resources

There is 1 Potential Black Commemorative Site in Analysis Zone 7: the William P. Stewart Highway (**Exhibit 3.9-40**) (Source: the Washington State Black Historic Sites Survey).

There are 6 Hispanic Historic Sites in Analysis Zone 7, including Barron's Barbershop, Cesar Chavez Park, Jalisco Restaurant, Sea Mar Community Health Clinic, Juan Colorado Mexican Food, and Pasteleria y Panaderia La Ideal (**Exhibit 3.9-40**) (Source: the 2018 Latino Heritage Survey).

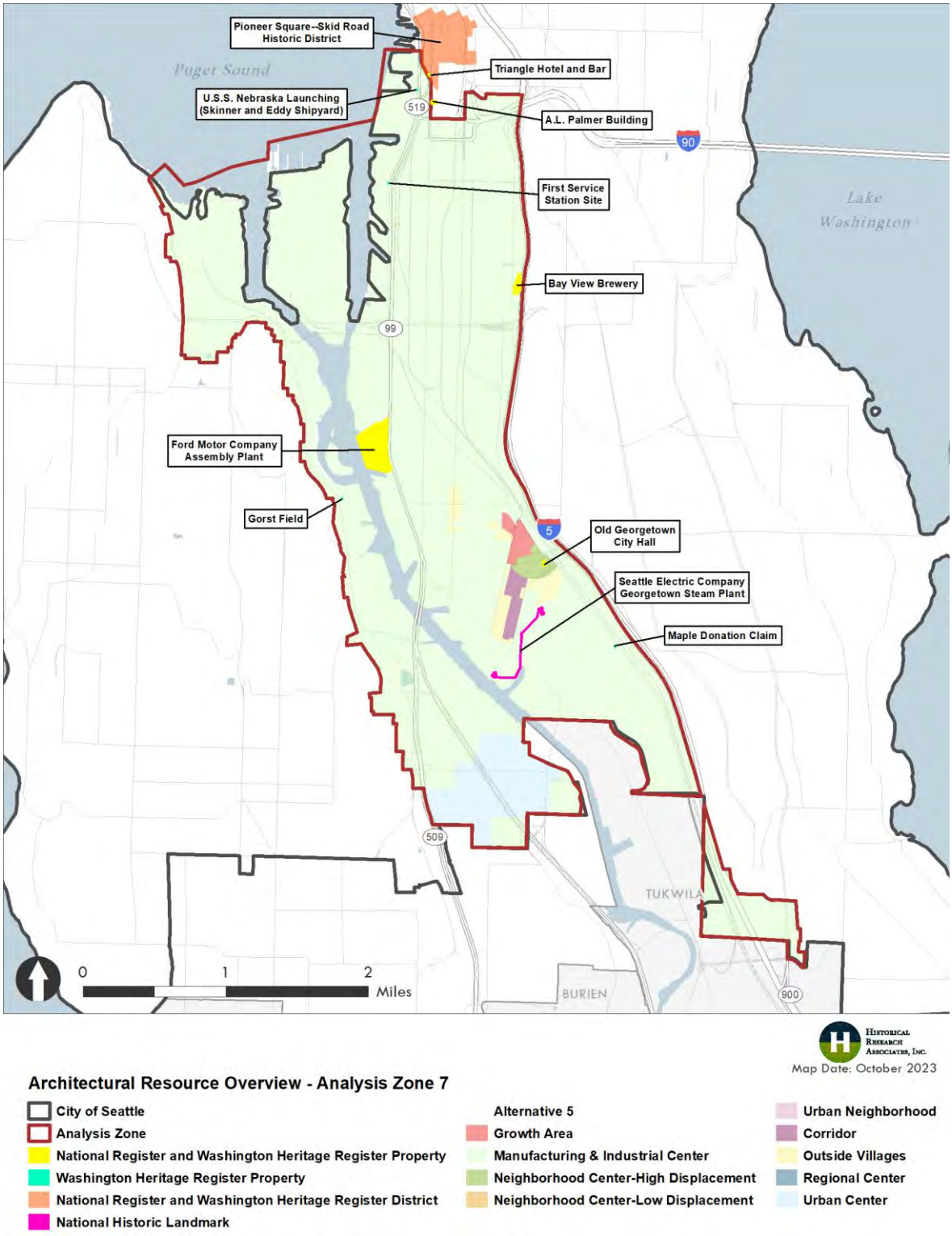
Exhibit 3.9-40. Area 7: Duwamish—Designated Seattle Landmarks, Seattle Historic Districts, and Culturally Important Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

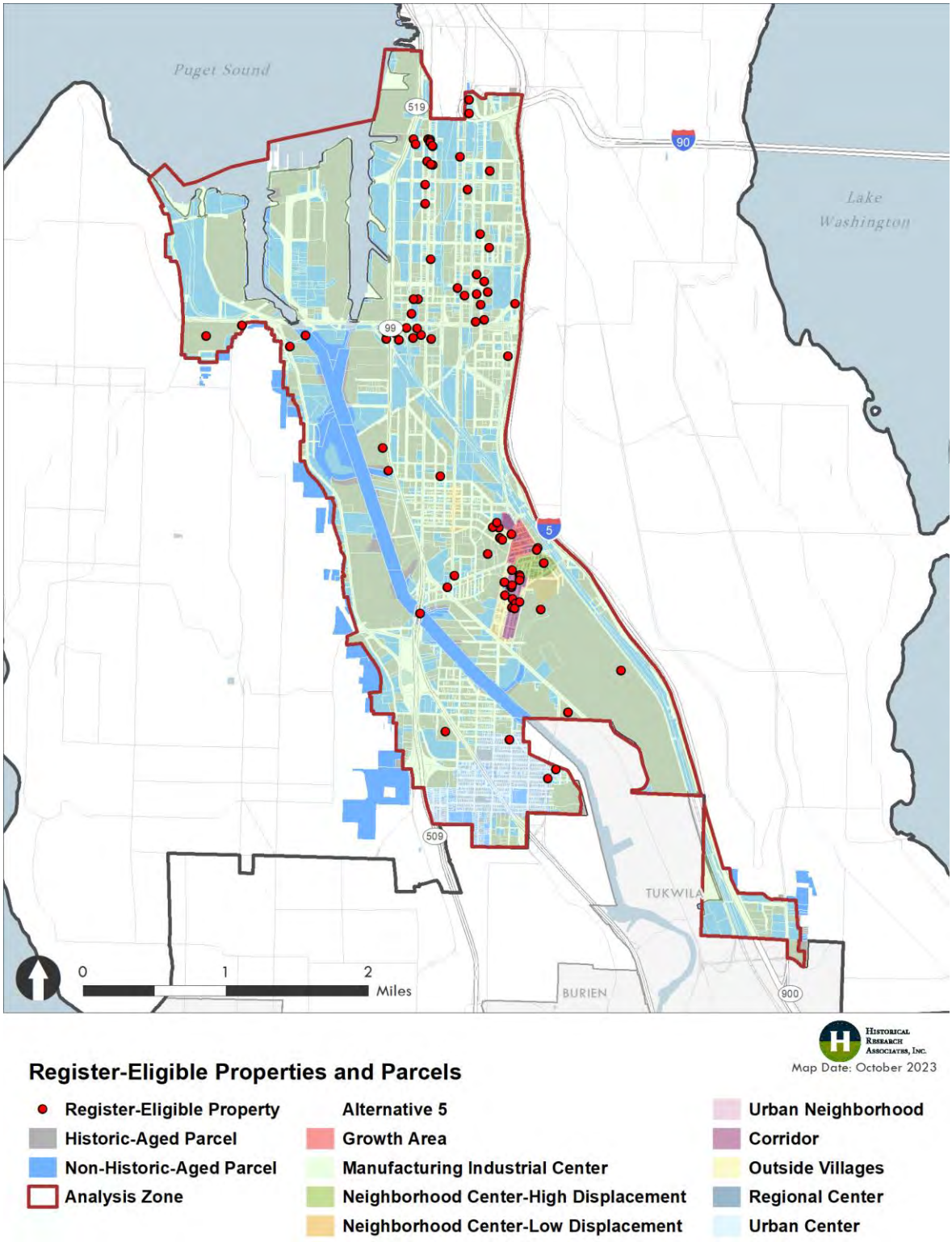
Source: HRA, 2023.

Exhibit 3.9-41. Area 7: Duwamish—NHL-, NRHP- and WHR-Listed Architectural Properties and Districts



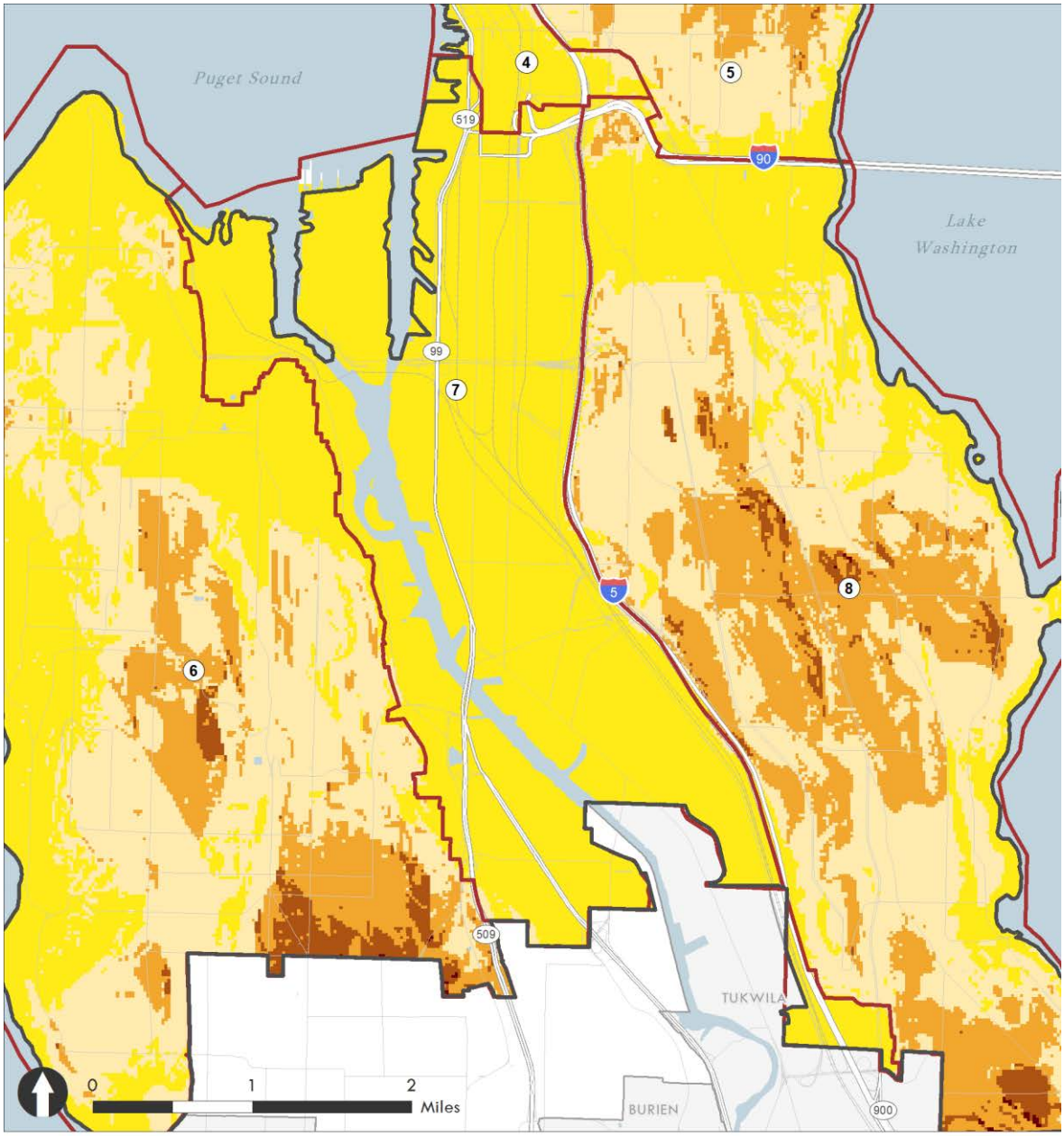
Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.
Source: HRA, 2023.

Exhibit 3.9-42. Area 7: Duwamish—Historic-Aged Parcels and NRHP-Eligible Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.
Source: HRA, 2023.

Exhibit 3.9-43. Area 7: Duwamish—Map Showing Archaeological Sensitivity from DAHP Model



Source: HRA, 2023.

Area 8: SE Seattle

There are 1 Seattle Landmark district and 4 NRHP-listed historic districts located in the SE Seattle analysis area. These resources are listed in the table below (**Exhibit 3.9-44**).

There are a large number of Seattle Landmarks in the SE Seattle area. Adding these resources to the table would create a table that spans a number of pages, so they will be only briefly mentioned here. There are 34 designated Seattle Landmarks in the SE Seattle area. Of these, 17 are residential buildings, 6 are education-related buildings, 2 are religious institutions, 2 are fire stations, 1 is a hospital, 1 is a boulevard, 1 is a street clock, 1 is a bridge, 1 is a garden, 1 is a clubhouse, and 1 is an inn. These resources are significant under a variety of the six standards for designation and **Exhibit 3.9-45**).

Exhibit 3.9-44. Area 8: SE Seattle—SL-designated and NRHP-listed Districts

Property Name, Type	Register/List Date/Significance	Period of Significance
Columbia City Landmark District, District	SL / 1978 / Criterion A for Development of Seattle, Criterion C for Cultural and Economic Heritage of the Community, and Criterion D for Architecture	1893–1936
Columbia City Historic District, District	NRHP / 2005 / Criterion A for Community Planning and Development, Commerce, Transportation, and Social History, and Criterion C for Architecture	1891–1937
Ellsworth Storey Cottages Historic District, District	NRHP / 1976 / Criterion C for Architecture and Landscape Architecture	1912–1916
Lake Washington Boulevard, District	NRHP / 2017 / Criterion A for Community Planning and Development, Recreation and Culture, and Transportation, and Criterion C for Landscape Architecture	1904–1963
Mount Baker Park Historic District, District	NRHP / 2018/ Criterion A for Community Planning and Development, and Social History, and Criterion C for Architecture and Landscape Architecture	1907–1968

Sources: DAHP, 2023.

There are 14 NRHP-listed and 1 WHR-listed resources found in the SE Seattle analysis area. Of the 15 individually listed resources, 6 are residences, 2 are schools, 2 are sites, 1 is a clubhouse, 1 is a hospital, 1 is a tunnel and 1 is a bridge, which were listed in the NRHP under the *Historic Bridges and Tunnels in Washington State MPD,* and, finally, 1 is a Carnegie library, which was listed in the NRHP under the *Carnegie Libraries of Washington TR* (**Exhibit 3.9-46**).

Current King County Tax Assessor records show that within the SE Seattle area, there are 19,734 historic-period buildings. Of these, 18,827 are residential, including 18,481 residential buildings (single family dwellings, townhouses, duplexes, triplexes, and fourplexes), 319 apartment buildings, and 27 condominiums. The remaining 907 buildings are commercial, industrial, and governmental (**Exhibit 3.9-47**).

In contrast, DAHP records show 15,163 individual historic-period architectural resources have been entered on HPI forms within the SE Seattle area. Of these, only 80 were determined NRHP-eligible by DAHP or a federal agency and are plotted on the map (**Exhibit 3.9-47**). Many of the15,163 HPI forms were created by data transfer for an Assessors Data Project for King County. The resources in these HPIs were not formally surveyed and recorded, have neither eligibility recommendations nor determinations of eligibility, and the forms contain no survey data of any kind.

The discrepancy between the Assessor's and DAHP's records are likely due in part to demolitions that alter County Tax Assessor's records but do not change the records in DAHP's WISAARD database, and/or a lack of up-to-date survey and recordation of historic-period resources on HPI forms in WISAARD.

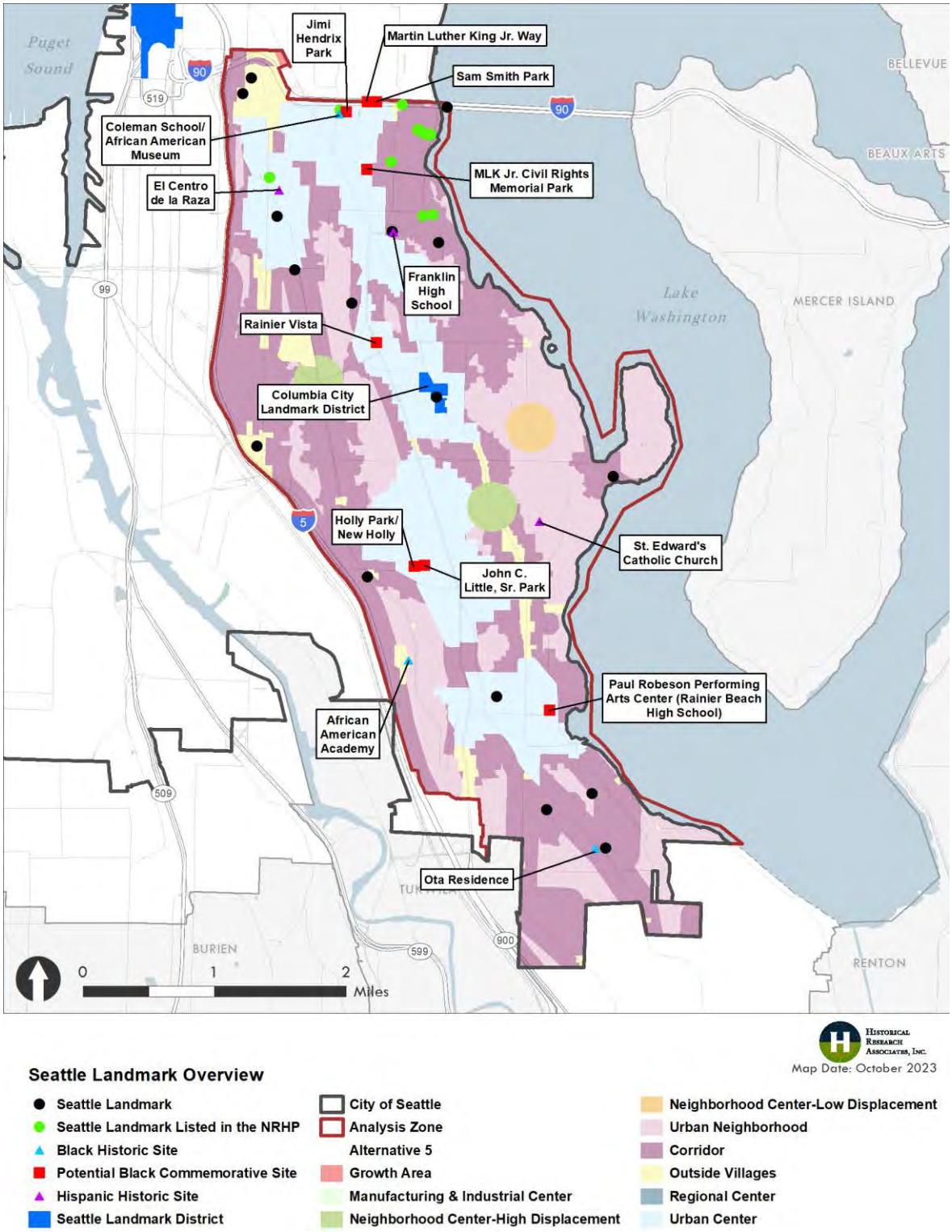
DAHP records show 16 cultural resources studies that included archaeological resources investigations that have been conducted within Analysis Zone 8 since 1995. Seven historic-period sites have been recorded within Analysis Zone 8. One of the sites was determined not eligible for listing in the NRHP and the remaining six sites have not been formally evaluated for listing in the NRHP. Much of Analysis Zone 8 is considered of High to Very High Risk to contain precontact archaeological resources by DAHP's precontact archaeological site probability model. Areas of Moderately Low to Moderate Risk are located in upland settings across the central portion and south end of Analysis Zone 8 (**Exhibit 3.9-48**).

Culturally Important Resources

There are 3 Black Historic Sites in Analysis Zone 8, including the African American Academy, Coleman School/African American Museum (which is a designated Seattle Landmark), and the Ota Residence. There are 8 Potential Black Commemorative Sites in Analysis Zone 8, including John C. Little, Sr. Park, Jimi Hendrix Park, MLK Jr. Civil Rights Memorial Park, Paul Robeson Performing Arts Center (Rainier Beach High School), Rainier Vista, Holly Park/New Holly, Sam Smith Park, and Martin Luther King Jr. Way (**Exhibit 3.9-45**) (Source: the Washington State Black Historic Sites Survey).

There are 3 Hispanic Historic Sites in Analysis Zone 8, including El Centro de la Raza, Franklin High School, and St. Edward's Catholic Church **Exhibit 3.9-45**) (Source: the 2018 Latino Heritage Survey).

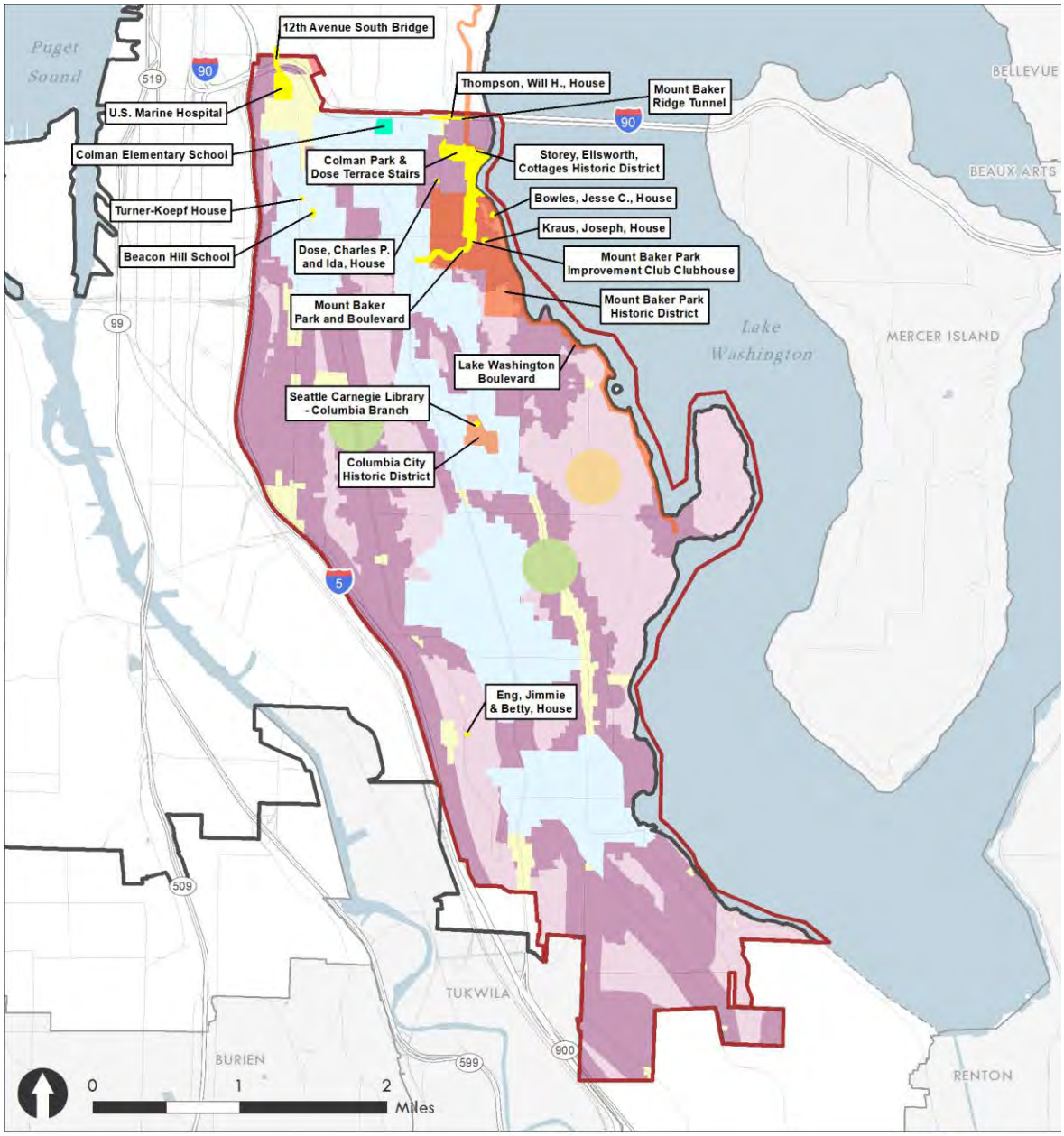
Exhibit 3.9-45. Area 8: SE Seattle—Designated Seattle Landmarks, Seattle Historic Districts, and Culturally Important Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

Exhibit 3.9-46. Area 8: SE Seattle—NRHP- and WHR-Listed Architectural Properties and Districts



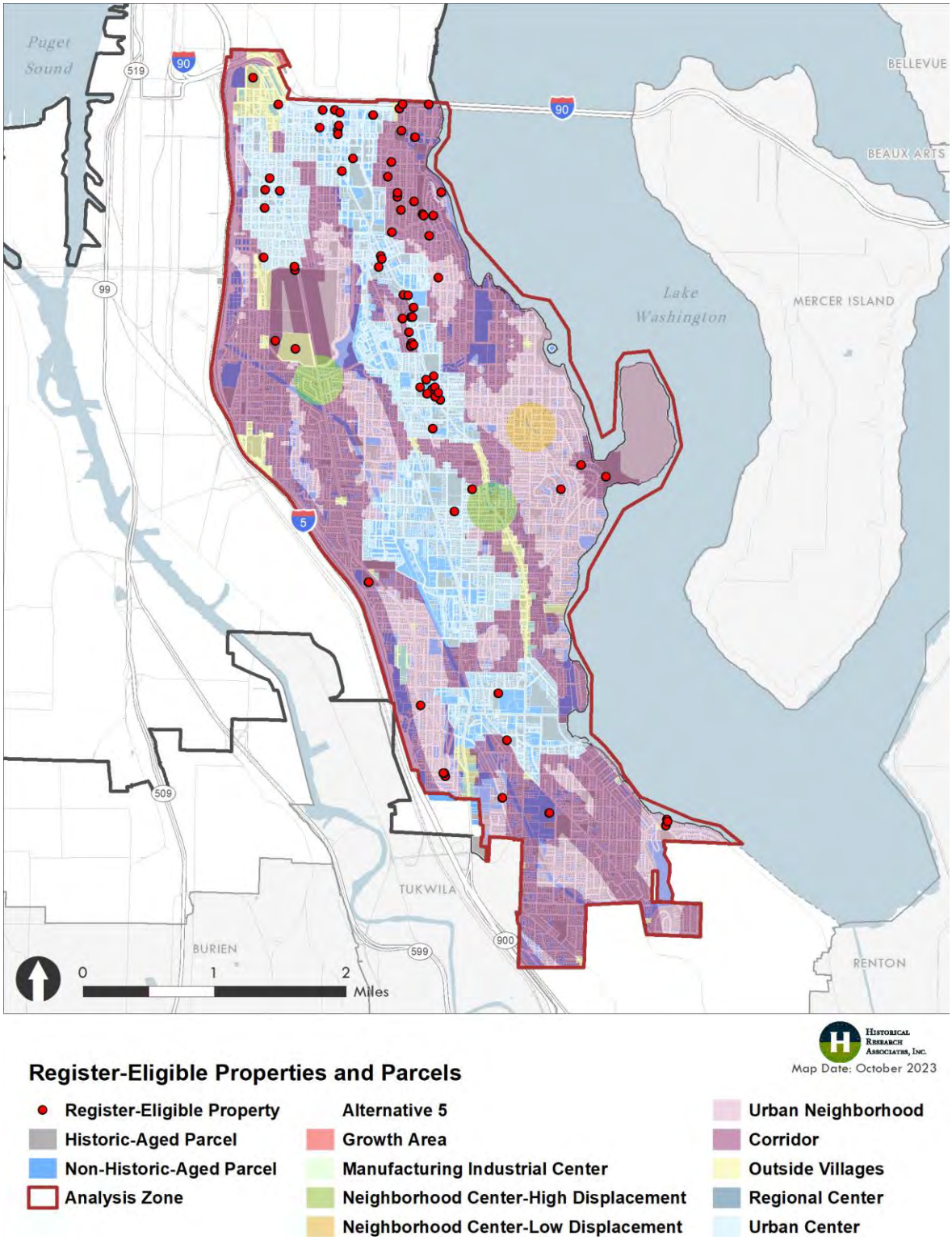
Historical Research Associates, Inc.
Map Date: October 2023

Architectural Resource Overview - Analysis Zone 8

- City of Seattle
- Analysis Zone
- National Register and Washington Heritage Register Property
- Washington Heritage Register Property
- National Register and Washington Heritage Register District
- Alternative 5
- Growth Area
- Manufacturing & Industrial Center
- Neighborhood Center-High Displacement
- Neighborhood Center-Low Displacement
- Urban Neighborhood
- Corridor
- Outside Villages
- Regional Center
- Urban Center

Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.
Source: HRA, 2023.

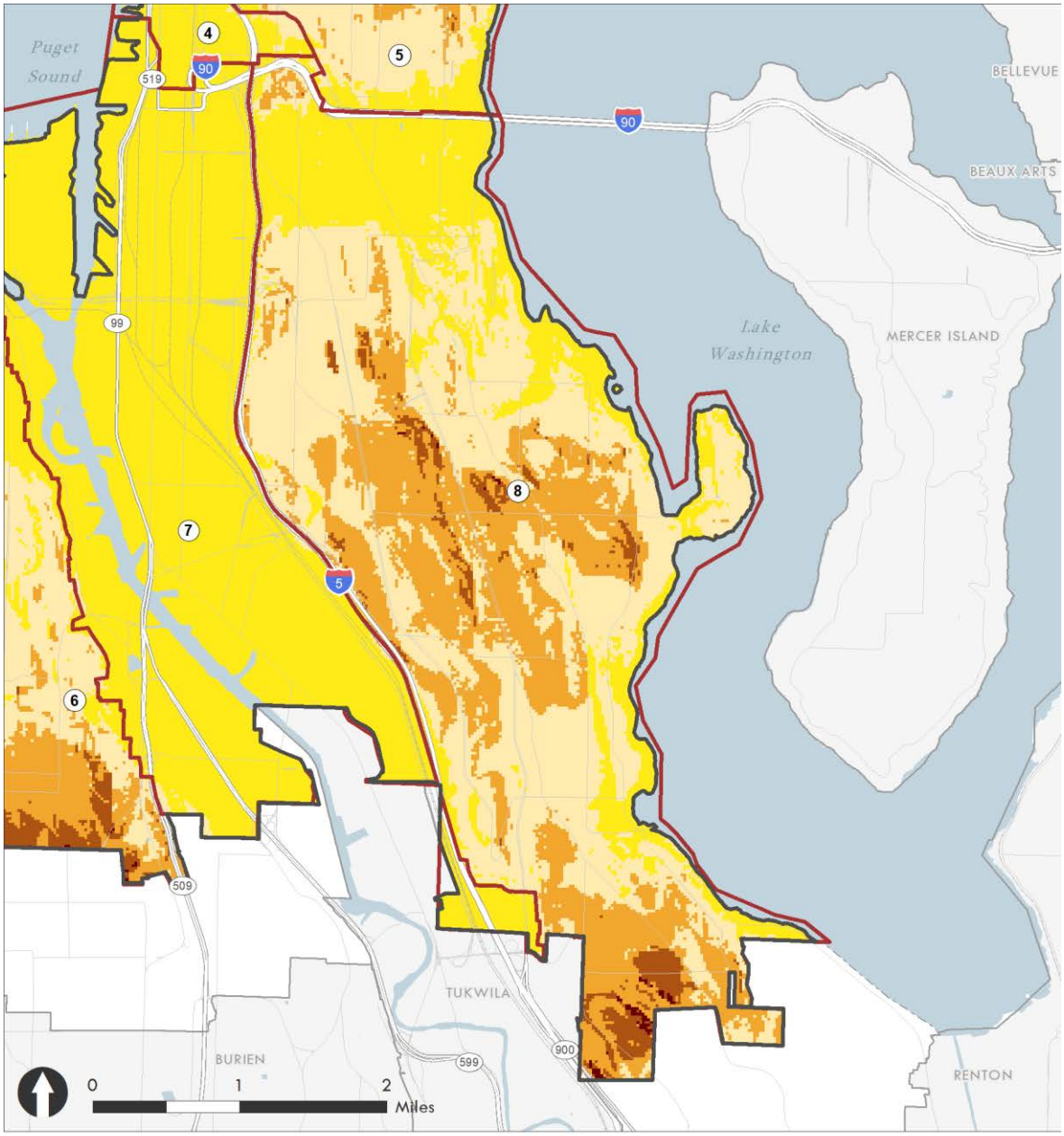
Exhibit 3.9-47. Area 8: SE Seattle—Historic-Aged Parcels and NRHP-Eligible Resources



Note: Base map shown for the cultural maps is Alternative 5, as it was the most extensive amount of change studied in the Draft EIS and allowed for the maximum impact analysis.

Source: HRA, 2023.

Exhibit 3.9-48. Area 8: SE Seattle—Map Showing Archaeological Sensitivity from DAHP Model



Source: HRA, 2023.

3.9.2 Impacts

This section considers the impacts of the alternatives on cultural resources within the study area.

Impacts of the alternatives on cultural resources are considered significant if they result in:

- Substantial adverse changes to, alteration, or loss of a resource that impacts its eligibility for inclusion as an SL, or in the NRHP, NHL program, or the WHR.
- Adverse impacts (potential loss of or alterations to the physical evidence or tangible evidence of cultural history) to Culturally Important Resources (CIR), which for the purposes of this EIS are important to certain cultural groups or communities, whether or not they are listed or eligible for the SL, NRHP, or WHR.

Resources that have been officially determined not eligible for these registers or considered CIR will not be adversely impacted by the proposed alternatives.

Impacts Common to All Alternatives

Full Study Area

All the alternatives have the potential to affect districts, sites, landscapes, or buildings, structures, objects (BSOs) that have been designated as an SL or listed in the NRHP and WHR, and those resources that have been determined eligible for listing in the NRHP. Additionally, the alternatives could potentially affect the numerous BSOs and unidentified archaeological sites that have yet to be surveyed and assessed for potential eligibility for listing in the registers.

Impacts to cultural resources in the study areas from the No Action Alternative and ~~four~~ five action alternatives were identified by assessing potential for both above- and below-ground changes. Such impacts generally include physical alteration, damage, or destruction of all or part of a resource; alteration of the characteristics of the surrounding environment that contribute to the property's significance; the introduction of visual or audible elements that are out of character with the property; and in the case of designated SLs, obstruction of protected public views of historic landmarks designated by the Landmarks Preservation Board. In other words, impacts are actions that would alter, directly or indirectly, any of the characteristics of a historic property in such a way that would diminish its integrity of location, design, setting, materials, workmanship, feeling, and association, and would affect its eligibility to qualify for inclusion in the NRHP or other historic registers have the potential to impact cultural resources.

Some of the action alternatives include proposed land-use changes such as allowing a wider range of housing options in residential zones and expanding housing choices; incentivizing development and densification of housing with stacked flats and multi-story, multi-family buildings; and some areas of mixed-use residential construction in selected locations (see **Exhibit 3.9-3**). Historic-period BSOs located in the study area could be subject to demolition

for new construction, incompatible alterations/additions, and inappropriate renovation of existing buildings for reuse under all alternatives. Such demolition and construction projects could require substantial below-ground work, thus negatively and irreversibly impacting below-ground archaeological and cultural resources. DAHP's archaeological predictive model, used to establish probabilities for precontact cultural resources, depicts much of the land within the study area as within a High or Very High Risk area, primarily because of proximity of Puget Sound, Salmon Bay, Lake Union, Elliott Bay, and the Duwamish River, and the use-history throughout the precontact and historic periods.

Additionally, Washington SEPA allows some projects to be exempt from SEPA review. SEPA exemptions vary by location, zone, and use. While SEPA review considers impacts from alterations to an SL (project must be reviewed and a Certificate of Approval issued by the Department of Neighborhoods [DON]/SL District Board) and impacts for projects that are adjacent to SLs (or across the street), some exempted projects are not subject to the same review and could impact cultural resources (Seattle Department of Construction and Inspections [SDCI] 2022; Seattle Department of Neighborhoods 2015).

Since development may occur in any location in the study area under any alternative, it is possible that cultural resources could be impacted under each alternative. Changes to zoning that allow a wider range of residential and/or commercial growth could spur redevelopment in those locations. This could occur, for example, where the focused growth within neighborhood centers would allow for a wide range of housing types and commercial space or within Neighborhood Residential zones where the ~~broad~~ expansion of housing options would allow for and possibly incentivize increased density on larger lots throughout the study area. Even where there are no formally designated historic properties, there are numerous properties with historic-period buildings, many of which have never been formally surveyed and evaluated for eligibility but could potentially qualify for designation as an SL or listing in the NRHP. Many are located in an area with a High or Very High Risk of archaeological resources.

Development or redevelopment is likely to impact cultural resources. The main differences among the alternatives are the level of residential development. Considering acres that may be affected by residential development in **Exhibit 3.3-4** and **Appendix G**, the total acres affected are highest under the Preferred Alternative overall, followed by Alternative 3 and Alternative 5. Generally, more development/redevelopment could impact more cultural resources. However, as described above, under any of the action alternatives there could be similar impacts to cultural resources due to variability in the location and timing of redevelopment, lack of full cultural surveys or assessments of historic resources, development exempt from SEPA review, and individual development applicant preferences regarding historic preservation.

Area 1: NW Seattle

All alternatives have the potential to affect the known and unknown cultural resources in the NW Seattle area. The NW Seattle area contains 3 NRHP-listed historic districts, 14 individually listed resources, 2 WHR-listed resources, 32 SL-designated resources, and 34,045 historic-

period buildings and structures, 59 of which have been determined eligible for listing in the NRHP. Survey has identified 1 Black historic site, 2 potential Black commemorative sites, and 1 Hispanic historic site within the NW Seattle area. Due to the area's concentration of historic-period BSOs—many of which have yet to be surveyed and evaluated for eligibility—it is plausible that many could potentially be determined eligible for listing in the NRHP and local registers, and additional CIRs. In the NW Seattle area, 8 known archaeological sites have been previously recorded; however, due to the area's mix of Moderate to Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

Area 2: NE Seattle

All alternatives have the potential to affect the known and unknown cultural resources in the NE Seattle area. The NE Seattle area contains 3 NRHP-listed historic districts, 18 individually listed resources, 9 WHR-listed resources, 39 SL-designated resources, and 28,352 historic-period buildings and structures, 140 of which have been determined eligible for listing in the NRHP. Survey has identified 2 Hispanic historic sites within the NE Seattle area. Due to the area's concentration of historic-period BSOs—many of which have yet to be surveyed and evaluated for eligibility—it is plausible that many could be determined eligible for listing in the NRHP and local registers, and additional CIRs. In the NE Seattle area, 10 archaeological sites have been previously recorded; however, due to the area's mix of Moderate to Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

130th/145th Station Area

All alternatives have the potential to affect the known and unknown cultural resources in the 130th/145th Station Area. While there are no NRHP- or WHR-listed historic districts or individually listed resources found within the 130th/145th Station Area, there are 3 SL-designated resources. Within the station area there are 5,260 historic-period buildings and structures, 2 of which have been determined eligible for listing in the NRHP. Due to the area's concentration of historic-period BSOs—most of which have yet to be surveyed and evaluated for eligibility—it is plausible that many could be determined eligible for listing in the NRHP and local registers. In the 130th/145th station area, 1 archaeological site has been previously recorded. However, due to the area's Moderate to Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

Area 3: Queen Anne/Magnolia

All alternatives have the potential to affect the known and unknown cultural resources in the Queen Anne/Magnolia area. The Queen Anne/Magnolia area contains 3 NRHP-listed historic districts, 19 individually listed resources, 4 WHR-listed resources, 59 SL-designated resources, and 12,546 historic-period buildings and structures, 120 of which have been determined eligible for listing in the NRHP. Survey has identified 1 Black Historic Site and 1 Potential Black Commemorative Site within the Queen Anne/Magnolia area. Due to the area's concentration of

historic-period BSOs—many of which have yet to be surveyed—it is plausible that many could be determined eligible for listing in the NRHP and local registers, and additional CIRs. In the Queen Anne/Magnolia area 14 archaeological sites have been previously recorded; however, due to the area's Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

Area 4: Downtown/Lake Union

All alternatives have the potential to affect the known and unknown cultural resources in the Downtown/Lake Union area. Found within the Downtown/Lake Union area are 6 NHLs, 3 NRHP-listed historic districts, 80 individually listed resources, 1 WHR-listed historic district, 20 individually listed WHR resources, 155 SL-designated resources, and 1,711 historic-period buildings and structures, 278 of which have been determined eligible for listing in the NRHP. Survey has identified 1 Black Historic Site and 1 Potential Black Commemorative Site within the Downtown/Lake Union area. Due to the area's concentration of historic-period BSOs—many of which have yet to be surveyed—it is plausible that many could be determined eligible for listing in the NRHP and local registers, and additional CIRs. In the Downtown/Lake Union area 1 historic archaeological site was listed in the NRHP and WHR and 35 historic-period sites have been previously recorded. Of these, 2 have been determined eligible for the NRHP. Due to the area's Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

Area 5: Capitol Hill/Central District

All alternatives have the potential to affect the known and unknown cultural resources in the Capitol Hill/Central District area. The Capitol Hill/Central District area contains 7 NRHP-listed historic districts, 46 individually listed resources, 7 WHR-listed resources, 117 SL-designated resources, and 14,100 historic-period buildings and structures, 399 of which have been determined eligible for listing in the NRHP. Survey has identified 25 Black Historic Sites, 16 Potential Black Commemorative Sites, and 3 Hispanic Historic Sites within the Capitol Hill/Central District area. Due to the area's concentration of historic-period BSOs—many of which have yet to be surveyed—it is plausible that many could be determined eligible for listing in the NRHP and local registers, and additional CIRs. In the Capitol Hill/Central District area, 14 archaeological sites have been previously recorded, with 1 determined eligible for listing in the NRHP. However, due to the area's Moderate to Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

Area 6: West Seattle

All alternatives have the potential to affect the known and unknown cultural resources in the West Seattle area. The West Seattle area contains 4 individually NRHP-listed resources, 1 WHR-listed resource, 24 SL-designated resources, and 22,764 historic-period buildings and structures, 48 of which have been determined eligible for listing in the NRHP. Survey has

identified 2 Potential Black Commemorative Sites and 3 Hispanic Historic Sites in the West Seattle Area. Due to the area's concentration of historic-period BSOs—many of which have yet to be surveyed—it is plausible that many could be determined eligible for listing in the NRHP and local registers, and additional CIRs. In the West Seattle area, 8 archaeological sites have been previously recorded, with none yet determined eligible for listing in the NRHP. However, due to the area's High to Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

Area 7: Duwamish

All alternatives have the potential to affect the known and unknown cultural resources in the Duwamish area. Found within the Duwamish area is 1 NHL, 1 NRHP-listed historic district, 5 individually listed resources, 4 WHR-listed resources, 14 SL-designated resources, and 2,115 historic-period buildings and structures, 84 of which have been determined eligible for listing in the NRHP. Survey has identified 1 Potential Black Commemorative Site and 6 Hispanic Historic Sites in the Duwamish area. Due to the area's concentration of historic-period BSOs—many of which have yet to be surveyed—it is plausible that many could be determined eligible for listing in the NRHP and local registers, and additional CIRs. In the Duwamish area, 38 archaeological sites have been previously recorded, with 1 precontact site listed in the NRHP and 1 precontact site determined eligible for listing in the NRHP. However, due to the area's Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

Area 8: SE Seattle

All alternatives have the potential to affect the known and unknown cultural resources in the SE Seattle area. Found within the SE Seattle area are 4 NRHP-listed historic districts, 14 individually listed resources, 1 WHR-listed resource, 34 SL-designated resources, and 19,734 historic-period buildings and structures, 80 of which have been determined eligible for listing in the NRHP. Survey has identified 3 Black Historic Sites, 8 Potential Black Commemorative Sites, and 3 Hispanic Historic Sites in SE Seattle area. Due to the area's concentration of historic-period BSOs—many of which have yet to be surveyed—it is plausible that many could be determined eligible for listing in the NRHP and local registers, and additional CIRs. In the SE Seattle area, 7 archaeological sites have been previously recorded, with none determined eligible for listing in the NRHP. However, due to the area's Moderate to Very High Risk for archaeological and cultural resources, many more as yet unknown sites could be present.

Equity & Climate Vulnerability Considerations

In 2015, Seattle established the City of Seattle Equity and Environment Initiative (EEI) to address the connection between race and social justice and the environment. The Community Partners Steering Committee (CPSC), working with City staff, defined EEI populations as people of color, immigrants, refugees, people with low incomes, and people with limited-English

proficiency (CPSC 2016:1–8). Studies by the National Trust for Historic Preservation (NTHP) have noted that while rezoning and redevelopment can address some of the particular issues in neighborhoods with high EEI populations of historically marginalized communities, such as poor air and water quality, soil contamination, noise pollution, climate change, and unsafe, disconnected, and inaccessible neighborhoods, some of the land use strategies could lead to adverse impacts such as the loss of historic and culturally important resources (CIRs) that have yet to be identified and documented within these communities (Canaan et al. 2021:54–55; NTHP 2021:10; Rypkema 2004).

Under all alternatives, should redevelopment occur within high EEI population neighborhoods in the study areas, benefits could be realized such as reinvestment in aging buildings, increased levels of homeownership/business ownership in newly rehabilitated buildings, and renovation/adaptive re-use of vacant and abandoned properties. However, there could also be adverse impacts from these benefits such as rising rents and property taxes, loss of "power" and "ownership" by long-term residents, and rising potential for conflicting priorities between new and long-term residents (Ryberg 2010:265–266; Rypkema 2004). These adverse impacts disproportionately affect EEI populations.

Analysis indicates that all alternatives have the potential to affect historic and cultural resources through development/redevelopment in historically marginalized neighborhoods in the study areas. Specifically, impacts to historic-period architectural resources could occur under all alternatives as a result of alteration, demolition, damage, or destruction to historic buildings associated with increased economic activity. Reinvestment may raise the cost of living, displacing long-term residents and weakening cultural cohesion. In addition, development under all alternatives could increase the probability of inadvertent discovery of archaeological and cultural resources because of foundation, circulation, and landscaping work.

Additionally, Indigenous populations may lose access to both known and potentially unrecorded cultural or spiritual sites due to redevelopment on their traditional lands in the study areas. As the locations of such resources are considered restricted information, specifics will not be discussed here without permission from the appropriate Tribes.

The Seattle area has experienced intensified weather events including heat, rain, snow, and flooding. These trends will doubtless continue due to Seattle's proximity to waterways. Impacts associated with intensified weather events (sea level rise, flooding, extreme storms, erosion, etc.) can potentially damage historic and cultural resources—both previously identified and as yet unknown (Calhoun 2023; CIG 2009:6–20; de Leon 2022; Seattle City Light 2015).

Impacts of Alternative 1: No Action

Alternative 1, No Action, maintains the status quo, with no changes to current Comprehensive Plan policies, development standards, or zoning, and with most housing and jobs remaining within existing regional centers (previously urban centers) and urban centers (previously urban villages) with no change to land use patterns. Under this alternative, new housing will continue to

be primarily rental apartments concentrated in existing mixed-use areas. Most of the land outside of the regional centers and urban centers will remain limited to detached houses.

Development projects due to market pressures under Alternative 1, No Action, would continue to affect cultural resources, with such impacts as alteration, demolition, damage, or destruction. Alternative 1, No Action, includes no additional protections or improvements in planning for consideration of impacts to cultural resources.

130th/145th Station Area

In the 130th/145th Station Area, NR zoning would continue to allow three-story, single-purpose residential development around the future light rail station at 130th Street and some four- to eight-story, multifamily development near the 145th Street BRT station. The blocks around 130th Street would see an additional 194 housing units and 646 units would be developed at 145th Street.

Development projects due to market pressures under Alternative 1, No Action, would continue to affect cultural resources, with such impacts as alteration, demolition, damage, or destruction. Alternative 1, No Action, includes no additional protections or improvements in planning for consideration of impacts to cultural resources.

Impacts of Alternative 2: Focused

Alternative 2 identifies specific locations for areas of focused growth (known as neighborhood centers) creating more housing around shops and services. Within neighborhood centers (previously neighborhood anchors), this alternative would allow a variety of housing options including duplexes, triplexes, fourplexes, sixplexes/three-story stacked flats, townhouses/rowhouses, and up to seven-story apartment buildings. Similar to urban centers (previously urban villages), which also allow for a wide range of housing types and commercial space, neighborhood centers would have a smaller geographic size and lower intensity of allowed development than urban centers. This alternative would result in a greater range of housing options with amenities and services in many neighborhoods with more constraints on growth than Alternatives 3, 4, ~~and~~ 5, and the Preferred Alternative. Regional centers (previously urban centers) and urban centers (previously urban villages), would gain up to 80,000 housing units, while neighborhood centers could gain up to 20,000 housing units with a mix of residential and mixed-use development. All neighborhood centers already contain areas zoned for commercial or mixed-use development; however, the City expects additional jobs and commercial space in these areas might increase more quickly due to the local demand for new housing.

Alternative 2 focuses housing growth around existing retail/commercial spaces. Typically, the neighborhood centers will be located in places where similar commercial, neighborhood commercial, and low-rise multi-family zoning is applied today but with expanded use allowances and development standards. These new neighborhood centers could incentivize

development to increase floor area and height limits allowing construction of dense multi-story buildings. Most residential growth under Alternative 2 would be in regional centers and neighborhood centers (low displacement risk), with most growth located in areas 4 (Downtown/Lake Union), 1 (NW Seattle), and 2 (NE Seattle). As described in the Affected Environment and mapped in **Exhibit 3.9-1,** some new neighborhood centers contain or abut listed historic properties or recorded archaeological resources, or contain mapped resources sensitivity areas (e.g., High to Very High Risk of archaeological and cultural sensitivity), such as within the Loyal Heights and Upper Fremont (NW Seattle), Wedgwood and Sand Point Way (NE Seattle), Magnolia and Nickerson (Queen Anne/Magnolia), Montlake, Madrona, and Squire Park (Capitol Hill/Central District), Alki, North Delridge/Youngstown, and Gatewood (W Seattle), and Georgetown (Duwamish) neighborhood centers.

Impacts to cultural resources could occur under Alternative 2 as a result of alteration, demolition, damage, or destruction. In addition, development under Alternative 2 could increase the probability of inadvertent discovery of below-ground archaeological and cultural resources as compared to Alternative 1, No Action, because of substantial foundation work needed for multi-story buildings. Alternative 2 includes no additional protections or planning improvements to account for impacts to cultural resources. Additionally, some allowed adaptive reuse projects could impact historic-period architectural resources by allowing for inappropriate alterations, changes, additions, and loss of character-defining features and historic building materials that could diminish the building's ability to qualify as a designated SL or for listing in the NRHP.

130th/145th Station Area

In the 130th/145th Station Area, Alternative 2 would designate three neighborhood centers near 130th Street and Roosevelt Way, 125th Street and 15th Avenue, and 145th Street and 15th Avenue, clustering denser, taller buildings and growth near transit. These neighborhood centers would include a mix of low-rise residential, mid-rise residential, and neighborhood commercial (NC3), which includes commercial, office, multi-story mixed use, and residential building types, with no size limits for most commercial uses. Development would be more mixed-use near the 145th Station Area (with NC3) compared to Alternative 1. Building heights would be allowed up to 75 feet. The area would see 2,208 new housing units and 979 new jobs. Development projects under Alternative 2 could affect cultural resources, with such impacts as alteration, demolition, damage, or destruction.

Impacts of Alternative 3: Broad

Alternative 3 allows a wider range of low-scale housing options, such as detached and attached homes (duplexes, triplexes and fourplexes), as well as three-story stacked flats such as sixplexes on larger lots in all NR zones across the city. A three-story height limit will continue to apply to market-rate development in these areas; however, the City will also study potential height, floor area, or density incentives for affordable housing projects. Existing regional centers (previously urban centers) and urban centers (previously urban villages) would gain

up to 80,000 housing units, while the urban neighborhood areas would see up to 20,000 additional housing units in new housing types. Additionally, the distribution of jobs and commercial space may shift toward existing urban neighborhood areas to reflect local demand. The City will also consider allowing more flexibility for commercial space in these areas, such as corner stores, or easing the way for at-home businesses.

Alternative 3 includes some areas of zoning change such as increased or altered boundaries of urban centers, which could incentivize development to increase floor area and height limits allowing construction of dense multi-story buildings. Most residential growth under Alternative 3 would be in regional centers and neighborhood centers (low displacement risk), with most growth located in areas 2 (NE Seattle), 4 (Downtown/Lake Union), and 1 (NW Seattle). As described in the Affected Environment and mapped in **Exhibit 3.9-1,** growth will occur in the areas that contain or abut listed historic properties or recorded archaeological resources, or contain mapped resources sensitivity areas (e.g., High to Very High Risk of archaeological and cultural sensitivity) in NR zones across the city. Insufficient formal survey and inventory has been undertaken in many of the NR zones across the city, leaving broad swaths of historic-period single-family and small-scale multi-family residential buildings as-yet unidentified or evaluated, and thus vulnerable to impacts from development.

As described in the Affected Environment and mapped in **Exhibit 3.9-1,** there are designated SLs, NRHP- and WHR-listed properties and mapped resources sensitivity areas (e.g., High to Very High Risk of archaeological and cultural sensitivity) across the city within the NR zones (previously NR zones), such as Dunn Gardens (NRHP-listed) (NW Seattle), James and Pat Chiarelli House (designated SL and NRHP-listed) and the Julian and Marajane Barksdale House (NRHP-listed) (NE Seattle), Fort Lawton Landmark District (designated SL) (Queen Anne/Magnolia), Harvard-Belmont Historic District (designated SL and NRHP-listed) and Frink Park (NRHP-listed) (Capitol Hill/Central District), Schmitz Park Bridge (designated SL and NRHP-listed) (W Seattle), and Joseph Kraus House (designated SL and NRHP-listed) (SE Seattle).

Impacts to cultural resources could occur under Alternative 3 as a result of alteration, demolition, damage, or destruction. In addition, development under Alternative 3 could increase the probability of inadvertent discovery of below ground archaeological and cultural resources as compared to Alternative 1, No Action, because of substantial foundation work needed for multi-story buildings. Alternative 3 includes no additional protections or planning improvements to account for impacts to cultural resources. Additionally, some allowed adaptive reuse projects could impact historic-period architectural resources by allowing for inappropriate alterations, changes, additions, and loss of character-defining features and historic building materials that could diminish the building's ability to qualify as a designated SL or for listing in the NRHP.

130th/145th Station Area

In the 130th/145th Station Area, Alternative 3 would develop based on the citywide framework. Current regional centers and urban centers would remain in the study area with more flexibility in urban neighborhood areas for "missing middle" housing and small areas of commercial/residential. As with other alternatives, development projects under Alternative 3 could affect cultural resources, with such impacts as alteration, demolition, damage, or destruction. Alternative 3 includes no additional protections or improvements in planning for consideration of impacts to cultural resources.

Impacts of Alternative 4: Corridor

Alternative 4 will allow a wider range of housing options than other action alternatives but only in corridors**,** which can focus growth near transit, shops, large parks, and services. Under this alternative, corridors include about half the areas currently zoned NR. Within corridors, this alternative would allow a variety of housing options including detached homes, duplexes, triplexes, fourplexes, sixplexes/3-story stacked flats, townhouses/rowhouses, and up to 5-story apartments. The proposed corridors also include some areas currently zoned for multifamily and commercial development that could allow increases in building height. Existing regional centers (previously urban centers) and urban centers (previously urban villages)would gain up to 80,000 housing units, while the corridors would see up to 20,000 additional housing units in new housing types. Additionally, the distribution of jobs and commercial space may shift toward transit corridors to correspond with the location of housing growth.

Alternative 4 focuses residential growth along corridors in close proximity to transit stations, commercial and retail spaces, parks, and services, and includes some areas of zoning change such as increased or altered boundaries for urban centers, which could incentivize development to increase floor area and height limits, allowing construction of dense multi-story buildings. Most residential growth under Alternative 4 would be in urban centers and corridors, with most growth located in areas 2 (NE Seattle), 4 (Downtown/Lake Union), and 1 (NW Seattle). As described in the Affected Environment and mapped in **Exhibit 3.9-1,** growth will occur in the areas that contain or abut listed historic properties or recorded archaeological resources, or contain mapped resources sensitivity areas (e.g., High to Very High Risk of archaeological and cultural sensitivity), possibly impacting such cultural resources as the John B. Allen School (designated SL and NRHP-listed) and the Christ the King Catholic Church (CIR) (NW Seattle), the Bryant Elementary School (designated SL) and the Henry Owen Shuey House (designated SL and NRHP-listed) (NE Seattle), Magnolia Public Library (designated SL and NRHP-listed) and the (former) Seventh Church of Christ (designated SL) (Magnolia/Queen Anne), Samuel Hyde House (designated SL and NRHP-listed), Volunteer Park (designated SL and NRHP-listed), Millionaire's Row Historic District (NRHP-listed), Moore Mansion and Bordeaux House (designated SLs) (Capitol Hill/Central District), Fauntleroy Community Church and YMCA (designated SL) (W Seattle), Hat 'n Boots (designated SL) (Duwamish), and Van

Asselt School and Old Fire Station #33 (designated SLs), Ota Residence (CIR), and the Jimmie and Betty Eng House (NRHP-listed) (SE Seattle).

Impacts to cultural resources could occur under Alternative 4 as a result of alteration, demolition, damage, or destruction. In addition, development under Alternative 4 could increase the probability of inadvertent discovery of below ground archaeological and cultural resources as compared to Alternative 1, No Action, because of substantial foundation work needed for multi-story buildings. Alternative 4 includes no additional protections or planning improvements to account for impacts to cultural resources. Additionally, some allowed adaptive reuse projects could impact historic-period architectural resources by allowing for inappropriate alterations, changes, additions, and loss of character-defining features and historic building materials that could diminish the building's ability to qualify as a designated SL or for listing in the NRHP.

130th/145th Station Area

The station areas would develop based on the citywide framework. As with other alternatives, development projects under Alternative 4 could affect cultural resources, with such impacts as alteration, demolition, damage, or destruction. As described in the Affected Environment and mapped in **Exhibit 3.9-1,** growth will occur in the corridors that contain or abut listed historic properties or recorded archaeological resources, or contain mapped resources sensitivity areas (e.g., High to Very High Risk of archaeological and cultural sensitivity), possibly impacting such cultural resources as Ingraham High School (designated SL). Alternative 4 includes no additional protections or improvements in planning for consideration of impacts to cultural resources.

Impacts of Alternative 5: Combined

Alternative 5 will allow the largest increase in supply and diversity of housing throughout the city, similar to the Preferred Alternative. It combines the strategies in Alternatives 2, 3, and 4, and expands the boundaries of the city's existing regional centers (previously urban centers) and urban centers (previously urban villages), such as Admiral, Greenwood–Phinney Ridge, Morgan Junction, and Upper Queen Anne. Alternative 5 would change the place type designations of Ballard from an urban center (previously urban village) to a regional center (previously urban center), giving the area a greater share of residential and job growth. Additionally, under Alternative 5, the NE 130th Street Station Area would be redesignated as an urban center resulting in a larger share of residential and job growth. Regional centers (previously urban centers) and urban centers (previously urban villages) including Northgate, Crown Hill, Othello, Rainier Beach, South Park, and Westwood–Highland Park, would be studied for potential growth. Existing regional centers and urban centers would gain up to 80,000 housing units, while other areas would see up to 40,000 additional housing units in new housing types. Additionally, the distribution of jobs and commercial space would be a combination of the other alternatives and may shift toward transit corridors to correspond with the location of housing growth.

Alternative 5 applies the proposed land-use concepts of ~~all~~ alternatives 2-4, which could incentivize development to increase floor area and height limits, allowing for the construction of dense, multi-story buildings. Most residential growth under Alternative 5 would be in regional centers, residential urban centers, and neighborhood centers (low displacement risk), with most growth located in areas 2 (NE Seattle), 1 (NW Seattle), 4 (Downtown/Lake Union), and 5 (Capitol Hill/Central District). As described in the Affected Environment and mapped in **Exhibit 3.9-1,** growth under Alternative 5 will occur in the areas that contain or abut listed historic properties or recorded archaeological resources, or contain mapped resources sensitivity areas (e.g., High to Very High Risk of archaeological and cultural sensitivity), such as within the neighborhood centers (previously neighborhood anchors) of Upper Fremont (NW Seattle), Ravenna (NE Seattle), Squire Park (Capitol Hill/Central District), Alki and Gatewood (W Seattle), and Georgetown (Duwamish), and within the neighborhoods of Loyal Heights, Phinney, and Wallingford (NW Seattle), Haller Lake, Ravenna, and Sandpoint (NE Seattle), Ft. Lawton, Magnolia, and Queen Anne (Magnolia/Queen Anne), Capitol Hill, Montlake, Washington Park, Madrona, Central District, and Leschi (Capitol Hill/Central District), Delridge, Lincoln Park, and Fauntleroy Park (W Seattle), Georgetown (Duwamish), and Mount Baker, Beacon Hill, Columbia, South Beacon Hill, Seward Park, and Rainier Beach (SE Seattle). Impacts to cultural resources could occur under Alternative 5 as a result of alteration, demolition, damage, or destruction. In addition, development under Alternative 5 could increase the probability of inadvertent discovery of below ground archaeological and cultural resources as compared to Alternative 1, No Action, because of substantial foundation work needed for multi-story buildings. Additionally, some allowed adaptive reuse projects could impact historic-period architectural resources by allowing for inappropriate alterations, changes, additions, and loss of character-defining features and historic building materials that could diminish the building's ability to qualify as a designated SL or for listing in the NRHP.

130th/145th Station Area

In the 130th/145th Station Area, Alternative 5 would create an expansive urban center (previously urban village) at the Sound Transit light rail station along both sides of I-5, with zoning including low-rise residential, mid-rise multifamily, and neighborhood commercial (NC2 and NC3), linking Pinehurst's existing commercial area to an expanded residential/mixed-use area near the station. Development would be denser than Alternative 2, with more mixed-use, retail, and commercial buildings, and a wider variety of housing types. Building heights in the urban center would be allowed up to 95 feet, while in the nodes and corridors, building heights could be up to 80 feet. The urban center at NE 130th Street would see the highest residential growth of up to 1,644 housing units, while the neighborhood center at 145th Street and 15th Avenue would receive up to 1,059 housing units. The Station Area would see up to a total of 1,004 new jobs. As with other alternatives, development projects under Alternative 5 could affect cultural resources, with such impacts as alteration, demolition, damage, or destruction. As described in the Affected Environment and mapped in **Exhibit 3.9-1,** growth will occur in the areas that contain or abut listed historic properties or recorded archaeological resources, or contain mapped resources sensitivity areas (e.g., Moderately Low to High Risk of archaeological and cultural sensitivity),

possibly impacting such cultural resources as Ingraham High School, Lake City School, or Lake City Library (designated SLs). Alternative 5 includes no additional protections or improvements in planning for consideration of impacts to cultural resources.

Impacts of Preferred Alternative

Note: The impacts analysis for the Preferred Alternative was added since the Draft EIS.

The Preferred Alternative combines the strategies of all the action alternatives and includes the Mayor's Recommended Growth Strategy contained in the new One Seattle Comprehensive Plan, resulting in growth similar to Alternative 5. The Preferred Alternative will allow the largest increase in supply and diversity of housing throughout the city with 120,000 new residences and job growth of 158,000 new jobs, along with Alternative 5. Similar to Alternative 5, the Preferred Alternative would designate Ballard as a regional center giving the area a greater share of residential and job growth. The Preferred Alternative would expand boundaries at new light rail stations, such as Squire Park, and in other small centers, and would expand the boundaries of the city's existing regional centers (previously urban centers) such as First Hill/Capitol Hill Regional Center and 23rd & Union–Jackson Urban Center, and urban centers (previously urban villages), such as Admiral, Greenwood–Phinney Ridge, Morgan Junction, and Upper Queen Anne. Like Alternatives 2 and 5, the Preferred Alternative will create five new neighborhood centers including North Magnolia, High Point, Mid Beacon Hill, Upper Fremont, and Hillman City. South Park is redesignated to a neighborhood center under the Preferred Alternative. Urban Neighborhoods, a new place type will include a mix of low- to moderate-density housing and commercial development along arterials with access to transit. Existing regional centers and urban centers would gain up to 80,000 housing units, while other areas would see up to 40,000 additional housing units in new housing types. Additionally, the distribution of jobs and commercial space would be a combination of the other alternatives and may shift toward transit corridors to correspond with the location of housing growth.

Like Alternative 5, the Preferred Alternative applies the land-use concepts of all alternatives, which could incentivize development with increased floor area and building heights, allowing for the construction of dense, multi-story buildings. Most residential growth under the Preferred Alternative would be in regional centers, residential urban centers, and neighborhood centers (low displacement risk), with most growth located in North Seattle in Areas 1 (NW Seattle) and 2 (NE Seattle), followed by Area 4 (Downtown/South Lake Union), and then Area 5 (Capitol Hill/Central District). As noted in Alternative 5 above and described in the Affected Environment and mapped in **Exhibit 3.9-1,** growth under the Preferred Alternative will occur in areas that contain or abut listed historic properties or recorded archaeological resources, or contain mapped resources sensitivity areas (e.g., High to Very High Risk of archaeological and cultural sensitivity), such as within the neighborhood centers (previously neighborhood anchors) of Upper Fremont and Loyal Heights (NW Seattle), Ravenna, Wedgwood and Sandpoint Way (NE Seattle), Squire Park (Capitol Hill/Central District), Alki and Gatewood (W Seattle), and Georgetown (Duwamish), and within the neighborhoods of Loyal Heights, Phinney, and Wallingford (NW Seattle), Haller Lake, Ravenna,

and Sandpoint (NE Seattle), Ft. Lawton, Magnolia, and Queen Anne (Magnolia/Queen Anne), Capitol Hill, Montlake, Washington Park, Madrona, Central District, and Leschi (Capitol Hill/Central District), Delridge, Lincoln Park, and Fauntleroy Park (W Seattle), and Mount Baker, Beacon Hill, Columbia, South Beacon Hill, Seward Park, and Rainier Beach (SE Seattle). Impacts to cultural resources could occur under the Preferred Alternative as a result of alteration, demolition, damage, or destruction. In addition, development under the Preferred Alternative could increase the probability of inadvertent discovery of below ground archaeological and cultural resources as compared to Alternative 1, No Action, because of substantial foundation work needed for multi-story buildings. Additionally, some allowed adaptive reuse projects could impact historic-period architectural resources by allowing for inappropriate alterations, changes, additions, and loss of character-defining features and historic building materials that could diminish the building's ability to qualify as a designated SL or for listing in the NRHP.

130th/145th Station Area

In the 130th/145th Station Area, the Preferred Alternative, like Alternative 5, would create a large urban center (previously urban village) along both sides of I-5 at the NE 130th Street Light Rail Station area, with zoning that includes low-rise residential, mid-rise residential, and neighborhood commercial (NC2 and NC3). Under the Preferred Alternative, this urban center would see the highest residential and job growth. The 145th Station Area would be designated as a neighborhood center and would see similar zoning, growth in housing units, and somewhat less job growth. The neighborhood center would link Pinehurst's existing commercial area to an expanded residential/mixed-use area near the station. Under the Preferred Alternative, development would be dense, with the greatest increase in housing and job growth in the 130th Station Area urban area, and with slightly fewer jobs in the 145th Station Area Neighborhood Center. Building heights in the urban center would be allowed up to 95 feet, while in the nodes and corridors, building heights could be up to 80 feet. The urban center at NE 130th Street would see residential growth of up to 1,500 housing units and 360 new jobs, while the neighborhood center at 145th Street and 15th Avenue would receive up to 652 housing units and 298 new jobs. As with other alternatives, development projects under the Preferred Alternative could affect cultural resources, with such impacts as alteration, demolition, damage, or destruction. As described in the Affected Environment and mapped in **Exhibit 3.9-1**, growth will occur in the areas that contain or abut listed historic properties or recorded archaeological resources, or contain mapped resources sensitivity areas (e.g., Moderately Low to High Risk of archaeological and cultural sensitivity), possibly impacting such cultural resources as Ingraham High School, Lake City School, or Lake City Library (designated SLs). The Preferred Alternative includes no additional protections or improvements in planning for consideration of impacts to cultural resources.

3.9.3 Mitigation Measures

Incorporated Plan Features

The action alternatives are designed to incorporate some land-use concepts that may help to mitigate adverse impacts to cultural resources, such as updates to land-use policies to anticipate future innovations and trends that may incentivize adaptive reuse of historic-period architectural resources.

Regulations & Commitments

Projects implemented under the Comprehensive Plan and development regulations evaluated in this EIS may be required to comply with a number of federal, state, and local regulations, including the National Historic Preservation Act of 1966, as amended; Archaeological Resources Protection Act of 1979; National American Graves Protection and Repatriation Act; National Environmental Protection Act of 1969, as amended; Washington Executive Order 21-02 (formerly 05-05); or the Washington State Environmental Protection Act. Additionally, the City of Seattle, the state of Washington, and the United States government all maintain lists of historic properties.

For projects that may adversely impact or affect historic properties listed in or eligible for listing in the NRHP, additional public coordination and consultation with DAHP, area Tribes, and other consulting parties may be required. Such coordination could include mitigation.

Federal

Federal regulations that guide cultural resource management activities include the following:

- National Historic Preservation Act (NHPA) of 1966, as amended, 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.
  - The NHPA authorized the NRHP as the program to coordinate and support the Act. To be considered a historic property, a resource must be determined eligible for listing in the NRHP by meeting at least one of the four established Criteria of Evaluation and retaining sufficient integrity to express significance.
  - The NHL program functions to honor historic properties that are nationally and exceptionally significant in American history and culture. Properties must meet one of six NHL Criteria and possess a high degree of integrity.
- Archaeological Resources Protection Act (ARPA) of 1979 protects archaeological resources.
- National American Graves Protection and Repatriation Act (NAGPRA) creates protections for Native American burial sites, remains, and cultural objects.

- The National Environmental Protection Act (NEPA) of 1969, as amended, 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.

State

Washington state regulations that guide cultural resource management activities include the following:

- Washington Executive Order 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 Environmental Policy~~rotection~~ Act (SEPA) has a process to identify and analyze environmental impacts to cultural resources associated with governmental decisions such as issuing permits, constructing public facilities, or adopting regulations, policies, and plans. This is accomplished through the SEPA Checklist.
- Washington State Archaeological Sites and Resources Protection Act (RCW 27.53) 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 (25-46 WAC) establishes to establish 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.
- The WHR is an official state listing of significant sites and properties and is administered by DAHP. The list is honorary and the effects of listing in the WHR are parallel to the NRHP. Properties listed in the NRHP are automatically listed in the WHR.
- The WHBR honors the barns of the State that are historically significant. Administered by DAHP, the heritage barn designation allows the property owners access to matching grant funds (RCW 27.34.400).

Local

The City of Seattle also maintains city ordinances and city-run programs that guide cultural resource management activities within city boundaries. These include:

- City of Seattle's Historic Preservation Program, through the SL program, protects designated landmark sites, buildings, structures, objects, and districts city wide. 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).
- Seattle's Municipal Code (SMC) 25.05 Environmental Policies and Procedures, subsection 25.05.675.H provides Historic Preservation policies for the protection of historic buildings,

special historic districts, and sites of archaeological significance that are found within Seattle, but that are not yet designated Seattle Landmarks.

- The policy describes special historic districts that were established to protect their unique historical and cultural significance. These districts are subject to development controls and project review by special district review boards.
- The policy also includes a limited list of mitigation measures. Additionally, under SMC 25.05.675.P.2.b.i, the policy provides protection for Public View of historic landmarks designated by the Landmarks Preservation Board that, that, because of their prominence of location or contrasts of siting, age, or scale, are visual features of their neighborhood or the city, and contribute to the distinctive quality or identity of their neighborhood or the city.

Potential Mitigation Measures

Some examples of avoidance or mitigation for impacts for architectural resources, might include:

- Modifying demolition review process so that historic review occurs even if SEPA thresholds are increased.
- Reusing buildings instead of demolition;
- Preparing DAHP Level I (Historic American Building Survey/Historic American Engineering Record [HABS/HAER]) Documentation;
- Preparing DAHP Level II Documentation for submission to local archives and libraries;
- Prioritizing historic properties when the City funds seismic retrofits for Unreinforced Masonry (URM) buildings;
- Developing cultural landscape contexts, including within historically marginalized communities;
- Preparing histories of the area prioritizing Indigenous perspectives; the City could work with Tribes and others to develop context statements;
- Funding the collection of oral histories from within the historically marginalized communities and creating a repository for them;
- Funding City-initiated, community-led thematic historic context survey and inventory projects that focus on marginalized or underrepresented immigrant communities and preparing thematic context statements relating to those resources;
- Including development incentives for the preservation of architectural resources including adaptive reuse projects. These may include exemptions from the floor area ration calculation, or flexibility for allowable uses within the structure; such adaptive reuse projects should follow the *Secretary of the Interior Standards for Rehabilitation,* or the City should develop new rehabilitation guidelines for adaptive reuse;

Mitigation for adverse impacts to archaeological or cultural resources, could include:

- Prior to commencing site-specific subsurface investigations of soils, notifying the local Indigenous Tribes so an archaeologist can observe the work;
- Funding survey and inventory of archaeological sites.

- Updating tree removal requirements for archaeological sites.
- Employing standard archaeological techniques such as archaeological testing, excavation and data recovery/collection of artifacts, documentation, analysis, sharing evidence with the local Indigenous Tribes, and archiving, possibly in a repository for future research;
- Funding public education and outreach, including interpretive signage and/or a museum exhibit;
- Funding interpretive signage and educational programs for BIPOC communities' historic neighborhoods; or
- Funding development of digital and other media content, including film, to share holistic stories of the impacted resource(s).

The development of a preservation action plan for Seattle's lands affected by rising sea levels and erosion could help to protect the city's resources located near the waterfront and in riverine or low-lying areas. The plan could include vulnerability/risk assessment tools/mapping (that communities could use to assess climate vulnerability/risks to their significant historic and cultural resources), performance indicator tools (to see how historic structures would perform during intense storms), and resilience guidance (a "roadmap" to advise how to create/increase resilience of particular building types) (O'Donnell 2022). Another helpful tool for Seattle's historic property owners could be the development of a publicly accessible website for resilience treatments and strategies for building components/materials and landscapes (O'Donnell 2022; UTSA 2022).

Additionally, the City could consider broadening the historic and cultural resources consideration section of the Seattle All-Hazards Mitigation Plan (HMP) to utilize the aforementioned preservation action plan. Mitigation Goal 4 of the HMP states, "Protect the natural environment and cultural and historic resources," with the stated action for cultural resources as "promote mitigation of historic buildings and key cultural assets" (OEM 2016:6-2, 6-8). By determining which areas of the city are likely to be vulnerable to extreme storms and sea-level rise, survey and inventory of historic and cultural resources should be performed within those areas, and a mitigation plan developed following Federal Emergency Management Agency (FEMA) guidance in *Integrating Historic Property and Cultural Resource Considerations Into Hazard Mitigation Planning* (FEMA 2005).

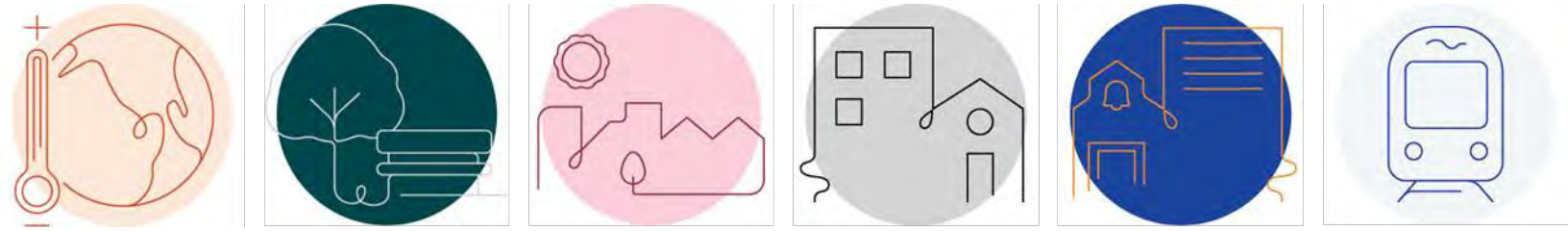
3.9.4 Significant Unavoidable Adverse Impacts

All the alternatives have the potential for significant adverse impacts to cultural resources in the analysis areas. Such impacts can include physical alteration, damage, or destruction of all or part of a resource; alteration of the characteristics of the surrounding environment that contribute to the property's significance; and the introduction of visual or audible elements that are out of character with the property. Such impacts could alter the characteristics of a historic property in such a way as to diminish its integrity, thus affecting its eligibility to qualify for inclusion in the SL or NRHP.

Advanced planning to eliminate, minimize, or avoid impacts to cultural resources would improve outcomes under all the alternatives. If elimination, minimization, or avoidance is impracticable, mitigation should be implemented by coordinating with the area's Tribes, the lead agency, and all other stakeholders and consulting parties in accordance with DAHP Mitigation Options and Documentation Standards, and the City of Seattle's Historic Preservation policies. The ultimate outcome of such mitigation is to moderate or substantially lessen the adverse impacts to cultural resources before they are lost or significantly altered. With the implementation of advanced planning or mitigation, significant adverse impacts to cultural resources can be avoided or minimized.

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3.10 Transportation





Source: City of Seattle, 2023.

The transportation section provides a multimodal analysis of transportation in Seattle to evaluate the potential impacts of the proposed land use alternatives. This section discusses the current transportation conditions in addition to future conditions under the alternatives. Further detail on each alternative can be found in **Chapter 2**.

Transportation impacts are identified under each alternative, as appropriate. Although not individually modeled, the potential impacts of Alternative 4 are expected to fall between the other action alternatives due to the overall magnitude of growth and pattern of density. The citywide growth total for Alternative 4 is equivalent to Alternative 2 and Alternative 3, while Alternative 5 and the Preferred Alternative have higher growth. The pattern of growth assumed in Alternative 4 falls between the more concentrated growth of Alternative 2 and more dispersed growth of Alternative 3.

Thresholds of significance utilized in this impact analysis are defined in **Section 3.10.2 Impacts**. Additionally, potential strategies to mitigate adverse impacts are discussed.

3.10.1 Affected Environment

This section presents existing transportation conditions throughout the City of Seattle for all modes as well as the current performance of the transportation network and methodologies used to quantitatively evaluate the current system. Evaluations address people walking and biking, transit, autos, freight, and safety. The geographies used for analysis depend on the metric. Some evaluation metrics are performed for each of the eight EIS analysis subareas shown in **Exhibit 3.10-1**: Northwest Seattle, Northeast Seattle, Queen Anne/Magnolia, Downtown/Lake Union, Capitol Hill/Central District, West Seattle, Duwamish, and Southeast Seattle. These analysis subareas are used to describe how transportation conditions vary throughout the city.

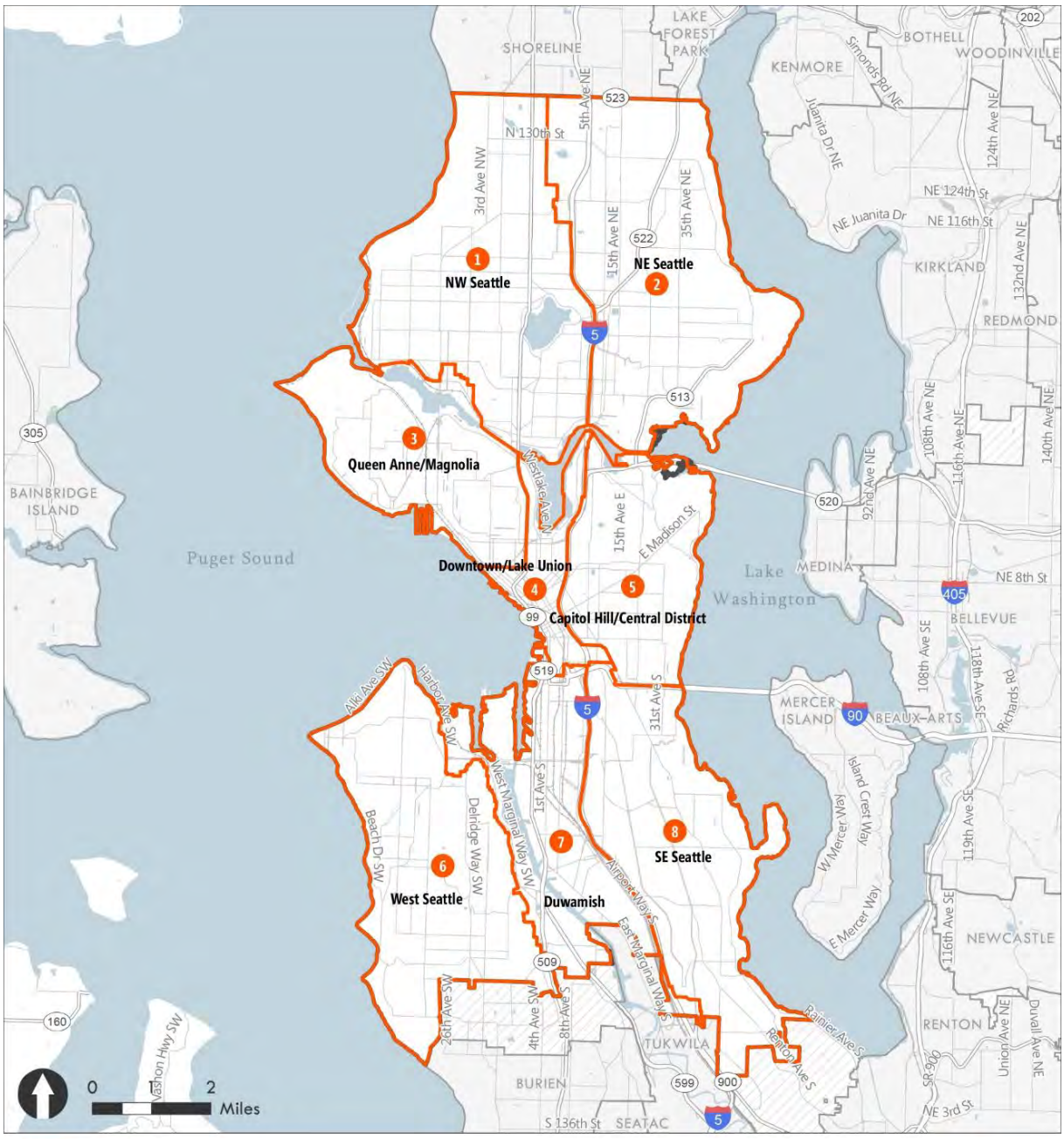
Data & Methods

This section describes the methodology used to evaluate impacts across scenarios. The following metrics are included as part of the evaluation:

- Mode share by subarea
- Person trips by mode
- Sidewalk network completion
- Access to All Ages and Abilities bicycle network
- Transit capacity analysis
- Vehicle Miles Traveled (VMT), Vehicle Hours Traveled (VHT), and average trip speed
- Corridor travel time
- Volume-to-Capacity across screenlines
- Intersection LOS in the NE 130th/NE 145th Street Subarea
- State facility capacity analysis

Each metric is used to quantitatively evaluate and contextualize impacts. The following sections describe the data sources and procedures for calculating each analysis metric.

Exhibit 3.10-1. EIS Analysis Subareas



Sources: City of Seattle, 2022.

Data Collection Period

This EIS considers two time periods for analysis: 2019 as the baseline of existing conditions and 2044 as a horizon year at which the outcomes of the alternatives are compared. Beginning in March 2020, the COVID-19 pandemic disrupted longstanding commute patterns and broader travel trends. In the same month, the closure of the West Seattle Bridge fundamentally changed local travel patterns through a large portion of the city until the bridge's reopening in September 2022. For these reasons, 2019 was selected as a more representative year for baseline travel conditions. Selecting 2019 as the base year also provides a more conservative assumption (i.e., a baseline with more traffic congestion) with respect to identifying potential impacts of the alternatives because growth is assumed to be additive to existing conditions.

Puget Sound Regional Council (PSRC) Travel Model

Puget Sound Regional Council (PSRC) built a travel demand model for the Puget Sound Region called SoundCast designed to evaluate future travel behavior and inform land use planning. The model covers the four-county region for which PSRC is the metropolitan planning organization: King, Kitsap, Snohomish, and Pierce counties. Therefore, the model provides an inherently cumulative evaluation of travel behavior that accounts for not only Seattle, but also the transportation networks and land uses in neighboring jurisdictions. SoundCast is an activity-based model which estimates travel behavior across the region based on characteristics of individual persons and their households. The model produces detailed trip diaries for each simulated person in the region throughout an average weekday tracking the departure time, starting location, ending location, travel mode, and any other people sharing that trip.

This model was used to evaluate trip patterns under each of the analyzed alternatives. Alternative 4 was not modeled due to its similarities to other alternatives; see discussion of Alternative 4 under **Section 3.10.2 Impacts**. SoundCast incorporates household and employment forecasts for each future year alternative within the EIS. PSRC regional assumptions are maintained for areas outside of Seattle city boundaries. Transportation facilities that ~~will~~ are expected to be in place by the horizon year 2044 are also incorporated into the future year model network. The model and user guide are available at psrc.org.

As noted above, travel patterns have substantively changed over the past several years, particularly related to commute trips as an increasing number of people work from home at least part of the time. The PSRC model is rooted in the travel patterns observed through its periodic regional household travel surveys and therefore reflects the more traditional commute patterns that occurred before the COVID-19 pandemic. While there is considerable uncertainty about how travel patterns will evolve in the coming years, the PSRC travel model is the best available tool to evaluate the future year alternatives. The model is best used to ~~3.10-4~~identify relative differences among alternatives rather than provide a specific prediction of the exact location and magnitude of impacts, particularly given this is a programmatic EIS.

Single Occupancy Vehicle (SOV) Mode Share by Subarea

Using PSRC household travel survey data for 2017 and 2019, existing single occupancy vehicle (SOV) mode share has been compiled based on the eight analysis subareas defined in the *Seattle 2035* Comprehensive Plan. **Exhibit 3.10-1** shows the eight EIS analysis subareas: (1) Northwest Seattle, (2) Northeast Seattle, (3) Queen Anne/Magnolia, (4) Downtown/Lake Union, (5) Capitol Hill/Central District, (6) West Seattle, (7) Duwamish, and (8) Southeast Seattle. For future conditions, the PSRC regional travel demand model is used to estimate the change in SOV mode share relative to these observed values.

~~As part of the One Seattle Comprehensive Plan update~~In the next several years, the City is proposing to replace the existing LOS standards, based on SOV mode share, with new multimodal LOS standards for locally owned arterials, locally and regionally operated transit routes, and active transportation facilities.

SOV mode share targets as defined in the *Seattle 2035* Comprehensive Plan are summarized in **Exhibit 3.10-2**.

Exhibit 3.10-2. Single Occupancy Vehicle (SOV) Mode Share Target by Subarea

Subarea	2035 Target
(1) Northwest Seattle	37%
(2) Northeast Seattle	35%
(3) Queen Anne/Magnolia	38%
(4) Downtown/Lake Union	18%
(5) Capitol Hill/Central District	28%
(6) West Seattle	35%
(7) Duwamish	51%
(8) Southeast Seattle	38%

Source: *Seattle 2035* Comprehensive Plan, Transportation Appendix, 2020.

Person Trips by Mode

Person trips by mode ~~will be~~is estimated at the citywide level as well as by EIS analysis subarea. This metric ~~will be~~is calculated for both the existing and future year evaluation using the PSRC regional travel demand model.

Sidewalk Network Completion

Using ArcGIS Pro, the pedestrian network is evaluated based on the percentage of sidewalk complete. The analysis uses sidewalk data from SDOT's ArcOnline Assets App. The percentage of sidewalk complete is calculated as the total sidewalk length divided by twice the length of centerline miles (i.e., defining 100% completion as sidewalks on both sides of every roadway).

These statistics are then aggregated at the census tract level to display the levels of sidewalk network completion throughout the city.

Access to All Ages and Abilities Bicycle Network

ArcGIS Pro ~~was~~ is used to estimate the number of people and jobs within ¼ mile of an All Ages & Abilities bicycle facility, which includes off-street trails, cycle tracks (protected bike lanes), and neighborhood greenways. The analysis uses bicycle facility data from the SDOT ArcOnline Assets App.

Transit Capacity Analysis

Transit boarding data has been summarized by route to evaluate the extent to which crowding occurs on each route. The average maximum load on each route (i.e., the highest number of riders using a bus or train at one time) is compared to the transit agency crowding threshold to determine the number of trips over the crowding threshold. The crowding threshold is set by the agency depending on the vehicle type and is based on the number of seats and standing room available to riders. The analysis evaluates each route's inbound and outbound direction and considers the PM peak period. For future conditions, the PSRC regional travel demand model, SoundCast, is used to forecast the change in ridership on the following routes: Link light rail, RapidRide bus, and those routes that were identified as exceeding the crowding threshold under existing conditions.

VMT / VHT / Average Trip Speed

The PSRC regional travel demand model provides estimates of daily vehicle miles traveled (VMT) and vehicle hours traveled (VHT) for both existing and future conditions. These metrics are reported both in total and relative to the total service population (number of residents and workers within the city) for each alternative. The methodology for VMT and VHT includes all trips with at least one end in Seattle and made by cars and trucks. Bus travel is not included as the number of bus trips is assumed to be the same across all future year alternatives. In addition, the ratio of VMT to VHT is reported; this metric represents the average speed of trips made by Seattle residents and workers.

Travel Time

Travel time along major city arterials is used as a performance measure because it addresses the fundamental concern of most travelers—the time it takes to move within and through the city. These travel times speak to mobility for autos, freight, and transit that all share space along these corridors. To assess existing conditions, PM peak hour travel times were analyzed using September through November 2019 data from SDOT's Iteris travel time data platform. The PM peak period represents the overall peak of traffic volumes during the day though some types of travel activity may peak at other times (for example, freight travel tends to peak during the morning and midday hours).

As noted in the **Data & Methods** section, using 2019 as the base year represents a period when traffic congestion was at its peak. Travel times decreased substantially during the pandemic as typical travel patterns were disrupted, remote work became more common, and traffic congestion decreased. Over the past several years, travel times have continued to increase toward pre-pandemic levels as traffic volumes have rebounded but peak period travel times are still generally below those experienced in 2019.

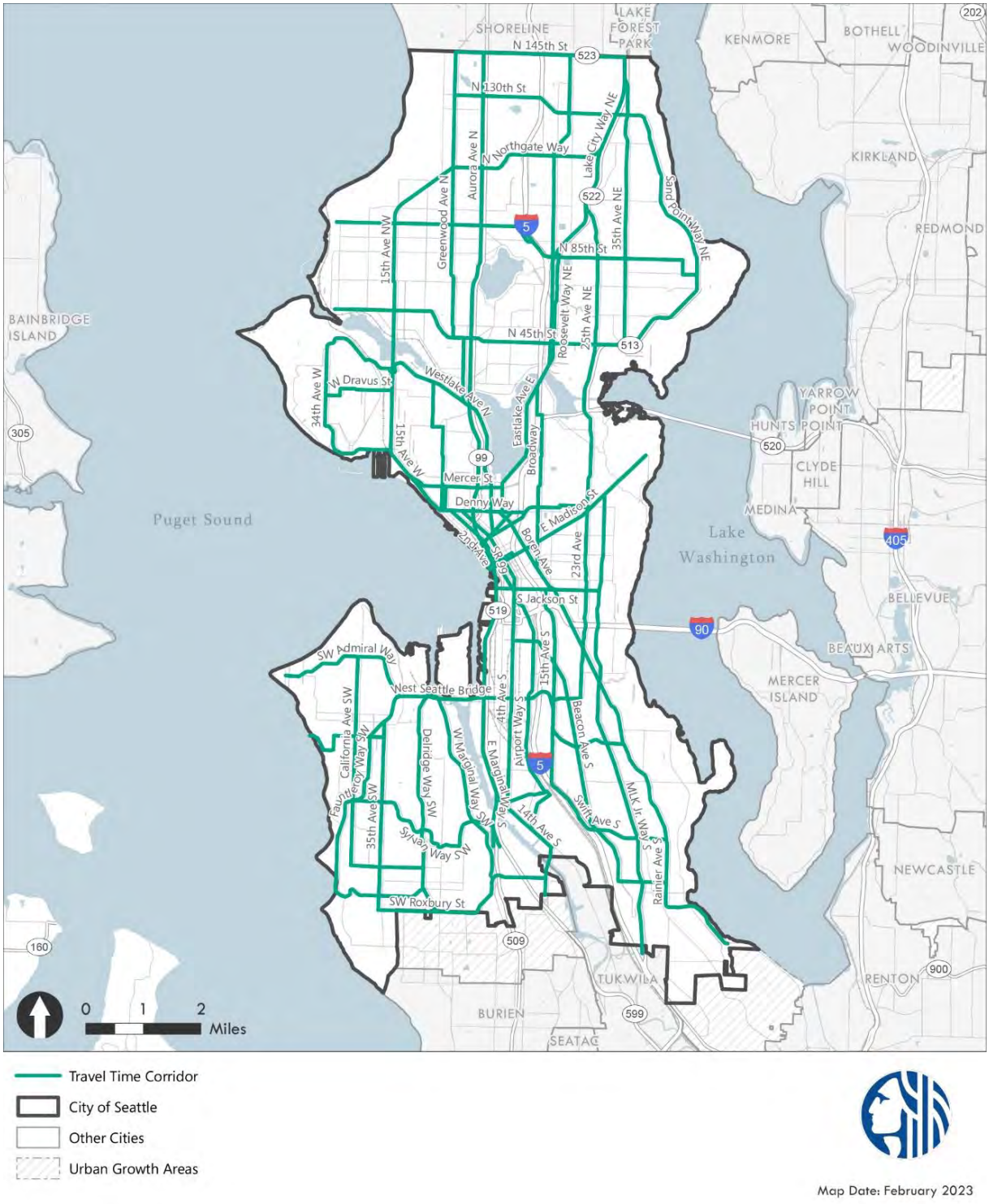
The concept of level of service (LOS) is used to describe traffic operations by assigning a letter grade of A through F, where A represents free-flow conditions, B represents free-flow conditions with some restrictions in lane changes, C is near free-flow conditions with a heavier flow, D is an unstable flow with minor queuing, E represents unstable flow with potentially extended queuing, and F represents highly congested conditions. This study uses concepts from the 7th Edition of the Highway Capacity Manual (HCM) to define thresholds for each LOS grade, as shown in **Exhibit 3.10-3.** The thresholds represent the ratio between observed travel time and free-flow travel time (i.e., at the speed limit). For example, a vehicle traveling at half the free-flow speed will have a travel time twice that of the free-flow travel time, which equates to the breakpoint between LOS C and LOS D. Because most city arterials include frequent signalized intersections or other traffic control, corridors in Seattle's urban environment tend to have travel times well below the overall speed limit of a corridor. The LOS values for the travel time study corridors in **Exhibit 3.10-4** utilize the thresholds described in **Exhibit 3.10-3**.

Exhibit 3.10-3. LOS Thresholds for Travel Speeds and Travel Time

	LOS A	LOS B	LOS C	LOS D	LOS E	LOS F
Threshold for Ratio of PM Peak Hour Travel Time to Travel Time at Free-Flow Speed	<1.25	<1.5	<2.0	<2.5	<3.0	≥3.0

Source: Highway Capacity Manual, 7th Edition, 2022.

Exhibit 3.10-4. Travel Time Corridors



Source: Fehr & Peers, 2023.

Screenlines

Seattle defines "screenlines" as one way to evaluate traffic conditions for autos, freight, and transit. A screenline is an imaginary line across which the number of passing vehicles is counted. Each designated screenline has a threshold in the form of a volume-to-capacity (V/C) ratio which is defined as the number of vehicles crossing the screenline compared to the capacity of the roadways crossing the screenline. This EIS evaluates 42 screenlines during the PM peak hour. **Exhibit 3.10-5** and **Exhibit 3.10-6** summarize the location of each screenline, as well as its threshold as designated in the *Seattle 2035* Comprehensive Plan. As shown in the map, there are screenlines along the north and south city limits to allow analysis of how the alternatives would affect traffic levels in neighboring jurisdictions. See the **State Facilities** sections for analysis of the SR 520 and I-90 facilities which indicate how the alternatives would affect traffic levels in communities across Lake Washington.

Thirty of the screenlines have performance thresholds defined while the remaining twelve (beginning with the letter A) provide supplemental information about performance in Seattle's regional centers but do not have specific performance thresholds defined.

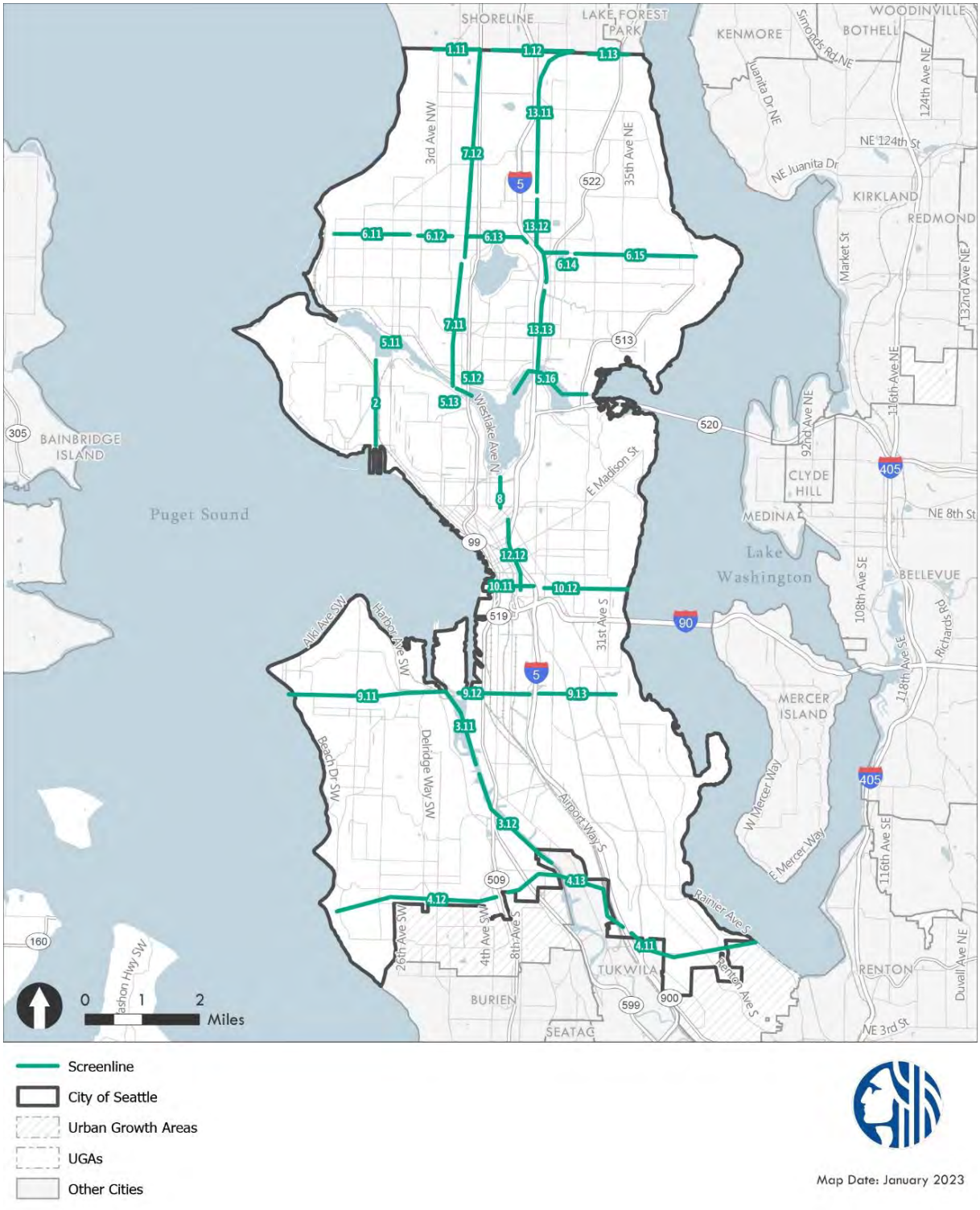
Exhibit 3.10-5. Screenline Locations and Volume-to-Capacity Thresholds

Screenline #	Screenline Location	Extents	V/C Threshold
1.11	North City Limit	3rd Ave NW to Aurora Ave N	1.20
1.12	North City Limit	Meridian Ave N to 15th Ave NE	1.20
1.13	North City Limit	30th Ave NE to Lake City Way NE	1.20
2.00	Magnolia	Magnolia Bridge to W Emerson Place	1.00
3.11	Duwamish River	West Seattle Bridge & Spokane St	1.20
3.12	Duwamish River	1st Ave S & 16th Ave S	1.20
4.11	South City Limit	Martin Luther King Jr. Way to Rainier Ave S	1.00
4.12	South City Limit	Marine Dr SW to Meyers Way S	1.00
4.13	South City Limit	SR 99 to Airport Way S	1.00
5.11	Ship Canal	Ballard Bridge	1.20
5.12	Ship Canal	Fremont Bridge	1.20
5.13	Ship Canal	Aurora Ave Bridge	1.20
5.16	Ship Canal	University & Montlake Bridges	1.20
6.11	South of NW 80th St	Seaview Ave NW to 15th Ave NW	1.00
6.12	South of N(W) 80th St	8th Ave NW to Greenwood Ave N	1.00
6.13	South of N(E) 80th St	Linden Ave N to 1st Ave NE	1.00
6.14	South of NE 80th St	5th Ave NE to 15th Ave NE	1.00
6.15	South of NE 80th St	20th Ave NE to Sand Point Way NE	1.00

Screenline #	Screenline Location	Extents	V/C Threshold
7.11	West of Aurora Ave	Fremont Pl N to N 65th St	1.00
7.12	West of Aurora Ave	N 80th St to N 145th St	1.00
8.00	South of Lake Union	Valley St to Denny Way	1.20
9.11	South of Spokane St	Beach Dr SW to W Marginal Way SW	1.00
9.12	South of Spokane St	E Marginal Way S to Airport Way S	1.00
9.13	South of Spokane St	15th Ave S to Rainier Ave S	1.00
10.11	South of S Jackson St	Alaskan Way S to 4th Ave S	1.00
10.12	South of S Jackson St	12th Ave S to Lakeside Ave S	1.00
12.12	East of CBD	S Jackson St to Howell St	1.20
13.11	East of I-5	NE Northgate Way to NE 145th St	1.00
13.12	East of I-5	NE 65th St to NE 80th St	1.00
13.3	East of I-5	NE Pacific St to NE Ravenna Blvd	1.00
A1	North of Seneca St	1st Ave to 6th Ave	N/A
A2	North of Blanchard	Elliott Ave to Westlake Ave	N/A
A3	East of 9th Ave	Lenora St to Pike St	N/A
A4	South of Mercer St	Elliott Ave W to Aurora Ave N	N/A
A5	East of 5th Ave N	Denny Way to Valley St	N/A
A6	North of Pine St	Melrose Ave E to 15th Ave E	N/A
A7	North of James St– E Cherry St	Boren Ave to 14th Ave	N/A
A8	West of Broadway	Yesler Way to E Roy St	N/A
A9	South of NE 45th St	7th Ave NE to Montlake Blvd NE	N/A
A10	East of 15th Ave NE	NE 45th St to NE 52nd St	N/A
A11	South of Northgate Way (N/NE 110th St)	N Northgate Way to Roosevelt Way NE	N/A
A12	East of 1st Ave NE	NE 100th St to NE Northgate Way	N/A

Source: *Seattle 2035* Comprehensive Plan, Transportation Appendix, 2020.

Exhibit 3.10-6. Screenline Map



Source: *Seattle 2035* Comprehensive Plan, Transportation Appendix, 2020.

Intersection Level of Service (LOS) Analysis—130th /145th Street Subarea

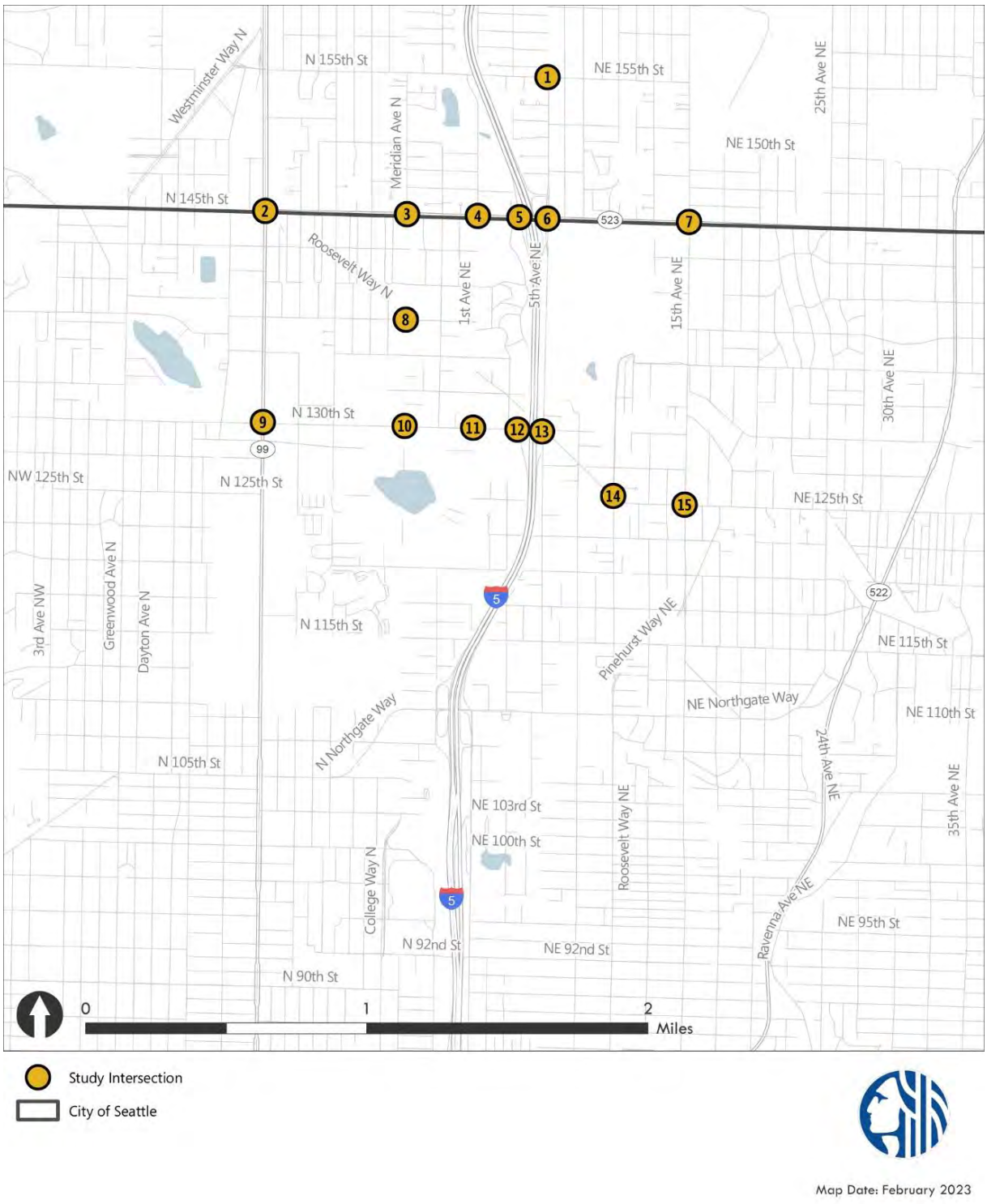
In addition to reviewing conditions and impacts citywide, this EIS also provides a focused review of the 130th and 145th Street Station Area Plan and options for the City to streamline future environmental review in that area. Therefore, this subarea is reviewed in greater detail, including intersection level of service (LOS) within the 130th/145th Street subarea surrounding the planned Link light rail stations. Study intersections were selected to cover the roughly quarter-mile to half-mile area around the stations and focus on arterial intersections that are most likely to see traffic volume changes due to growth in the area. This includes seven intersections within or along the city limit with Shoreline to capture potential effects to that neighboring jurisdiction. Average delay experienced at each intersection is estimated based on the volumes, lane configuration, and traffic control at each study intersection. **Exhibit 3.10-7** lists the 15 study intersections within the 130th/145th Street study area (mapped in **Exhibit 3.10-8**).

Exhibit 3.10-7. 130th/145th Street Subarea Study Intersections

Intersection ID	Intersection	Traffic Control
1	NE 155th St / 5th Ave NE	Signal
2	N 145th St / Aurora Ave N	Signal
3	N 145th St / Meridian Ave N	Signal
4	N 145th St / 1st Ave NE	Signal
5	NE 145th St / I-5 On & Off Ramps	Signal
6	NE 145th St / 5th Ave NE	Signal
7	NE 145th St / 15th Ave NE	Signal
8	N 137th St / Meridian Ave N / Roosevelt Way N	All-way Stop Control
9	N 130th St / Aurora Ave N	Signal
10	N 130th St / Meridian Ave N	Signal
11	N 130th St / 1st Ave NE	Signal
12	NE 130th St / I-5 On Ramp	Free / Yield
13	NE 130th St / Roosevelt Way NE / 5th Ave NE	Signal
14	Roosevelt Way NE / NE 125th St / 10th Ave NE	Signal
15	NE 125th St / 15th Ave NE	Signal

Source: Fehr & Peers, 2023.

Exhibit 3.10-8. 130th/145th Subarea Study Intersections Map



Sources: Fehr & Peers, 2023.

Intersection LOS is measured using a scale that ranges from LOS A (which represents minimal delay) to LOS F (which represents high delay and substantial congestion) as defined by the Highway Capacity Manual (Transportation Research Board, 2022). **Exhibit 3.10-9** displays the range of delays corresponding to each LOS grade. For signalized intersections and all-way stop intersections, the average delay is calculated as the average of all vehicles passing through a given intersection (i.e., on all approaches of the intersection). For side-street stop sign controlled intersections, the average delay and LOS are reported for the worst minor street movement. All study intersections are analyzed for the PM peak hour using Synchro software. For this EIS analysis, signalized intersections operating at LOS E or F and unsignalized intersections operating at LOS F are considered to be operating below acceptable levels.

Exhibit 3.10-9. Level of Service (LOS) and Delay Thresholds

LOS	Signalized Intersections Delay per Vehicle (seconds)	Unsignalized Intersections Delay per Vehicle (seconds)
A	≤ 10	≤ 10
B	> 10 to 20	> 10 to 15
C	> 20 to 35	> 15 to 25
D	> 35 to 55	> 25 to 35
E	> 55 to 80	> 35 to 50
F	> 80	> 50

Source: Transportation Research Board, 2022.

PM peak hour turning movement volumes were compiled for each study intersection. Most counts were collected during the 2016 to 2019 timeframe to reflect the pre-pandemic period with the exception of several counts collected in late 2022. Future year volumes were forecasted by applying the growth predicted by the PSRC regional travel demand model for each alternative to the observed counts.

State Facilities

State facilities (roadways owned by WSDOT) are also evaluated using the volume-to-capacity and LOS concepts. For this EIS analysis, capacities are defined using a set of tables developed by the Florida Department of Transportation (FDOT) based on Highway Capacity Manual methodologies. Capacities for this analysis are based on the characteristics of the roadway including number of lanes, presence of auxiliary lanes, and presence of ramp metering. Pre-pandemic (2019) annual average weekday traffic volumes were compiled from WSDOT's Traffic Count Database System. The results are summarized using Level of Service (LOS) designations A-F. WSDOT sets the standard for most of its facilities in Seattle at LOS D; the exception is the segment of SR 99 between SR 509 and I-5 which has a standard of "E mitigated" meaning congestion should be mitigated when PM peak hour LOS falls below LOS E. Future year volumes were forecasted by applying the growth predicted by the PSRC regional travel demand model for each alternative to the observed counts.

Current Policy & Regulatory Frameworks

Relevant policies related to transportation in Seattle are summarized below. At the time of Draft EIS publication, Tthe City of Seattle hads a 10-year strategic plan outlined in Move Seattle (2015) along with master plans specifically addressing pedestrians, bicycles, transit, and freight. and is currently developingSince the publication of the Draft EIS in March 2024, the City adopted a new citywide multimodal transportation plan as described at right. Seattle also has master plans specifically addressing pedestrians, bicycles, transit, and freight. More detailed information is available in the specified documents described in this section.

VISION 2050

VISION 2050, adopted in 2020, is the region's plan for how it will prepare for growth and meet goals including a healthy environment, thriving communities, and a strong economy. It also includes the region's multicounty planning policies which are adopted under the state's Growth Management Act. These policies guide Seattle's approach to growth as it develops its local comprehensive plan. The PSRC also released its 2022-2050 Regional Transportation Plan (RTP) which is a multimodal plan for the four-county region (King, Snohomish, Kitsap, and Pierce counties) to coordinate an integrated planning approach among the various jurisdictions in the region. The RTP includes an assessment of current and future transportation conditions and identifies regional projects to be implemented over the planning horizon.

Seattle Transportation Plan

As described here and in the Draft EIS, the City has previously adopted citywide modal plans for pedestrian, bicycle, transit, and freight travel. Since the publication of the Draft EIS in March 2024, SDOT is currently engaging in a process to createadopted a unified, multimodal Seattle Transportation Plan (STP) that will integrates the City's modal network visions into a single, holistic transportation plan.

A separate EIS was completed for the STP. The same No Action Alternative network assumptions are were used in both the Comprehensive Plan Draft EIS and STP EISs. The Comprehensive Plan Draft EIS assumes the No Action network is in place for all alternatives and tests varying land use alternatives. The STP EIS assumes Comprehensive Plan Alternative 5 land use growth and tests different network alternatives.

For the Comprehensive Plan Final EIS, the network maps, policy direction, and candidate projects from the adopted STP have been incorporated into an updated model of the No Action Alternative and Preferred Alternative networks.

Seattle Transportation Plan

The Seattle Transportation Plan (STP) was adopted in April 2024. The STP has six overarching goals: safety; equity; sustainability; mobility and economic vitality; livability; and maintenance and modernization. The STP outlines strategies and actions the City can take to reach each of those goals. The STP brings the City's previous modal plans (described later in this section) together into one vision for transportation in Seattle, but does include modal elements for transit; freight and urban goods; bicycle and e-mobility; pedestrian; people streets and public

spaces; vehicle; new and emerging mobility; and curbside management. The STP also includes a list of potential large capital projects that could be implemented to increase the capacity to move people and make the transportation system more efficient.

Pedestrian Master Plan

The Pedestrian Master Plan (PMP) envisions Seattle as the most walkable and accessible city in the nation.[65] To achieve that vision, the following goals are identified:

- Reduce the number and severity of crashes involving pedestrians;
- Develop a connected pedestrian environment that sustains healthy communities and supports a vibrant economy;
- Make Seattle a more walkable city for all through public engagement, service delivery, accessibility, and capital investments that promote equity; and
- Get more people moving to improve health and increase mobility.

The plan documents existing pedestrian facilities and defines a Priority Investment Network to guide future funding. SDOT publishes implementation plan reports every one to two years to update the public on its progress toward implementing PMP projects and meeting the identified performance measures.

Bicycle Master Plan

The Seattle Bicycle Master Plan (BMP) provides guidance on future investments in bicycle facilities in Seattle, with a vision for bicycling as a safe and convenient mode for people of all ages and abilities on a daily basis.[66] The plan identifies the following goals:

- Increase the amount and mode share of bicycle riding in Seattle for all trip purposes;
- Improve safety for bicycle riders in Seattle;
- Create a high-quality bicycle network that connects to places people want to go and provides a time-competitive travel option;
- Improve bicycle riding for all through equity in public engagement, program delivery, and capital investments; and
- Build vibrant communities by creating a welcoming environment for bicycle riding.

The document describes the existing network and over 400 miles of planned future network for the city. Strategies for end-of-trip facilities, programs, maintenance, project prioritization, and funding are included. SDOT publishes reports every one to two years to update the public on its progress toward implementing BMP projects and meeting the identified performance measures.

[65] Seattle Department of Transportation. 2017. "Pedestrian Master Plan." https://www.seattle.gov/documents/Departments/SDOT/About/DocumentLibrary/SeattlePedestrianMasterPlan.pdf
[66] Seattle Department of Transportation. 2014. "Bicycle Master Plan." https://www.seattle.gov/documents/Departments/SDOT/About/DocumentLibrary/BicycleMasterPlan/SBMP_21March_FINAL_full%20doc.pdf

Transit Master Plan

The Transit Master Plan (TMP) is a 20-year plan that outlines the needs to meet Seattle's transit demand through 2030.[67] It prioritizes capital investment to create frequent transit services that meet the most pressing needs of residents and workers. It outlines the high priority transit corridors and the preferred modes along each corridor. This document specifies capital projects to improve speed and reliability. Goals include:

- Meet sustainability, growth management and economic development goals;
- Make it easier and more desirable to take transit;
- Respond to needs of transit-reliant populations;
- Create great places where modes connect; and
- Advance implementation within constraints.

The elements of the document include policies and programs, transit corridors and service, access and connections to transit, and funding and performance monitoring.

Freight Master Plan

The Freight Master Plan (FMP) was adopted by the City in 2016.[68] Its purpose is to ensure efficient and predictable goods movement in the region to promote economic activity and international trade. This planning document is especially important for the two designated manufacturing and industrial centers, the Ballard-Interbay-Northend Manufacturing Industrial Center (BINMIC) and Greater Duwamish MIC, and the Port of Seattle. The FMP analyzes the current freight facilities and their ability to accommodate future freight growth and overlays the truck street system with other modal systems with the goal of facilitating better understanding of the potential for modal conflicts. The plan identifies six main goals with a total of 92 actions that address economy, safety, mobility, state of good repair, equity, and the environment in an effort to create a comprehensive freight network. The six overarching goals are as follows:

- Provide a freight network that supports a thriving and diverse economy for Seattle and the region;
- Improve the safety and the predictable movement of goods and people;
- Reliably connect manufacturing/industrial centers and business districts within the Seattle, regional, and international freight networks;
- Maintain and improve the freight transportation network to ensure safe and efficient operations;
- Benefit residents and businesses of Seattle through equity in freight investments and improve the health of communities impacted by goods movement; and

[67] Seattle Department of Transportation. 2016. "Transit Master Plan." https://www.seattle.gov/documents/Departments/SDOT/TransitProgram/TMPSupplmtALL2-16FINAL.pdf
[68] Seattle Department of Transportation. 2016. "Freight Master Plan." https://www.seattle.gov/documents/Departments/SDOT/About/DocumentLibrary/FMP_Report_2016E.pdf

- Improve freight operations in Seattle and the region by making goods movement more efficient and reducing its environmental footprint.

The plan also includes a list of freight supportive projects with a focus on corridors connecting the City's two MICs to the freeway system and corridors connecting the MICs to one another.

Vision Zero

Seattle has implemented a Vision Zero program, with the goal of zero serious injuries and fatalities on Seattle streets by 2030. Relevant plans include a 2015 Vision Zero Action Plan, 2017 Vision Zero Progress Report, and 2019 Vision Zero Update Report. The Vision Zero plans include equity and climate goals of eliminating racial disparities and reducing the number of personal trips that produce emissions.[69] The City of Seattle is moving forward with the program through the implementation of a wide range of projects and distribution of resources.

New Mobility Playbook

The New Mobility Playbook was published in 2017 to address the rapid changes to the transportation context, including ride-hailing, bike share, scooter share, and car share services.[70] The New Mobility Playbook outlines policies and strategies to guide the City's response to new mobility options while maintaining its commitment to safety, equity, affordability, and sustainability. The document discusses the potential benefits and risks of new mobility and defines five principles intended to drive the City's response to emerging technologies and mobility options:

- Put people and safety first;
- Design for customer dignity and happiness;
- Advance race and social justice;
- Forge a clean mobility future; and
- Keep an even playing field.

The New Mobility Playbook will guide the City's response to changes in transportation such that the implementation of new mobility options align with overall goals and plans.

Move Seattle

In 2015, voters approved a nine-year $930 million levy which replaced a prior levy that expired in 2015. The levy funds are used to implement projects including safety improvements, new facilities, as well as maintenance of existing infrastructure. Move Seattle is a strategic document

[69] Seattle Department of Transportation. "Vision Zero." https://www.seattle.gov/transportation/projects-and-programs/safety-first/vision-zero
[70] Seattle Department of Transportation. 2017. "New Mobility Playbook." https://www.seattle.gov/documents/Departments/SDOT/NewMobilityProgram/NewMobility_Playbook_9.2017.pdf

published in 2015 that guides SDOT's work over the 2016-2024 period with an updated workplan published in 2018.[71] The plan identifies projects within the following categories:

- Safe Routes
  - Vision Zero
  - Pedestrians and Bicyclists
  - Neighborhood Projects
- Maintenance and Repair
  - Arterial Roadway Maintenance
  - Bridges and Structures Maintenance
  - Urban Forest and Drainage
- Congestion Relief
  - Corridor Mobility
  - Light Rail Partnership
  - Pedestrian and Bicycle Improvements
  - Freight Mobility Improvements

SDOT provides annual reports summarizing accomplishments and delivery plans for the coming year as well as a Levy Performance Dashboard so the public can monitor the City's progress in implementing Move Seattle projects.[72] Since the publication of the Draft EIS, Seattle voters approved a $1.55 billion Seattle Transportation Levy which replaces the Levy to Move Seattle. The Seattle Transportation Levy will provide additional funding to SDOT over the next eight years to implement continued improvements.

Transportation Capital Improvement Program

For the 2022 to 2027 period, the Proposed Capital Improvement Program (CIP) plans to invest $1.6 billion on developing, maintaining, and operating Seattle's transportation system. Funded projects include street paving and resurfacing; building new sidewalks and curb ramps; school safety improvements; implementation of the modal plans described above; investments to facilitate freight mobility; traffic cameras and signals; bridge projects such as bridge replacement, maintenance, and seismic retrofitting; and support for the Waterfront Program.[73] Since the publication of the Draft EIS, the City has released its Proposed CIP for the 2025 to 2030 period.[74]

[71] Seattle Department of Transportation. 2018. "Levy to Move Seattle Workplan Report." https://www.seattle.gov/documents/Departments/SDOT/About/Funding/2018_1129_MoveSeattle_WorkPlan_FINAL.pdf
[72] Seattle Department of Transportation. 2022. "Reporting Dashboard: Levy to Move Seattle." https://public.tableau.com/app/profile/city.of.seattle.transportation/viz/Levy_Dashboard_16141242942520/SafeRoutes
[73] Seattle Department of Transportation. 2022. "2022-2027 Proposed Capital Improvement Program." https://www.seattle.gov/documents/Departments/FinanceDepartment/2227proposedcip/SDOT.pdf
[74] Seattle Department of Transportation. 2024. "2025-2030 Proposed Capital Improvement Program." https://seattle.gov/city-budget-office/capital-improvement-program-archives/2025-2030-proposed-cip

Complete Streets

Seattle's Complete Streets ordinance, passed in 2007, directs SDOT to design streets that balance the needs of all roadway users, including pedestrians, bicyclists, transit riders, and people of all abilities, while promoting safe operations for all users, including freight.[75] Design decisions are based on data, such as the adjacent land uses and anticipated future transportation needs. There is no set design template for complete streets as every situation requires a unique balance of design features within the available right-of-way. However, SDOT has developed a Right-of-Way Improvements Manual, called Seattle Streets Illustrated, which helps property owners, developers, engineers, and architects who are involved in the design, permitting, and construction of local streets.[76] Streets Illustrated sets standards for a variety of elements of the public right-of-way including sidewalks, landscaping, bicycle lanes, transit stop amenities, and vehicle lane widths.

Intelligent Transportation Systems (ITS) Strategic Plan

~~For the 2010-2020 period, t~~The Intelligent Transportation Systems (ITS) Strategic Plan provides a 10-year approach for implementing ITS across Seattle.[77] ITS employs electronic and communication technologies on the streets, as well as automated traffic systems, to enhance mobility for all modes by increasing the efficiency and safety of the transportation infrastructure. The goal of the strategic plan is to ensure the existing ITS infrastructure is maintained and preserved, maximize the value of the existing infrastructure, and expand ITS to provide additional geographic coverage and services to travelers.

Neighborhood and Subarea Transportation Planning

The City routinely works with specific communities to plan for needs at the neighborhood level, which can include discussing how to reduce modal conflicts, determine priorities within a local context, and develop design concepts and associated cost estimates. Recent neighborhood transportation planning efforts include:

- One Center City
- Georgetown Mobility Study
- Judkins Park Station Access Study
- Beacon Hill Station Access and Mobility Study
- North Downtown Mobility Study
- Imagine Greater Downtown
- Ballard-Interbay Regional Transportation System

[75] Seattle City Council. 2007. "Ordinance 122386."
http://clerk.ci.seattle.wa.us/search/results?d=CBOR&s1=115861.cbn.&Sect6=HITOFF&l=20&p=1&u=/%7Epublic/cbor2.htm&r=1&f=G
[76] Seattle Department of Transportation. 2022. "Seattle Right-of-Way Improvements Manual: Seattle Streets Illustrated."
https://streetsillustrated.seattle.gov/
[77] Seattle Department of Transportation. 2010. "ITS Strategic Plan."
https://www.seattle.gov/documents/Departments/SDOT/TechnologyProgram/ITSStrategicPlan20102020.pdf

Neighborhood and subarea transportation efforts are undertaken as needed to plan at a finer-grained level and provide cohesive plans for particular geographic focus areas.

Current Conditions

This section describes current transportation conditions for all modes in Seattle: active transportation (people walking, biking, and rolling), transit, autos, and freight. The transportation network is described at various geographies: citywide, neighborhoods and districts, and for the 130th/145th Street subarea in particular. While not exhaustive given the programmatic nature of this EIS, some metrics are evaluated at a more detailed level, for example, subareas of the city or specific key facilities.

SOV Mode Share by Subarea

PM peak single occupancy vehicle (SOV) mode shares by subarea are summarized in **Exhibit 3.10-10**. This data is from the PSRC household travel survey which is a sampling of households to understand typical travel behavior. Because the PSRC household travel survey data sample size is limited at the subarea level, the margin of error ranges from 11% to 28%. The City of Seattle's overall SOV mode share during the PM peak is estimated to be 36%; the margin of error at the city level is approximately 7%. Given the margin of error in this survey, it is difficult to characterize the extent to which mode share is on track to meet the 2035 target.

Exhibit 3.10-10. PM Peak SOV Mode Share by Subarea, 2017-2019

Subarea	2035 SOV Target	2017-2019 Share of Single Occupancy Vehicles
(1) Northwest Seattle	37%	42% (+/- 14%)
(2) Northeast Seattle	35%	35% (+/- 16%)
(3) Queen Anne/Magnolia	38%	42% (+/-25%)
(4) Downtown/Lake Union	18%	24% (+/-11%)
(5) Capitol Hill/Central District	28%	37% (+/-20%)
(6) West Seattle	35%	41% (+/-26%)
(7) Duwamish	51%	72% (+/-28%)
(8) Southeast Seattle	38%	36% (+/-17%)
Citywide	N/A	36% (+/-7%)

Note: Margins of error are based on a 90% confidence interval.
Source: Puget Sound Regional Council Household Survey, 2017-2019.

Person Trips by Mode

Exhibit 3.10-11 summarizes the current estimates of daily person trips in Seattle. Of the roughly 4.1 million daily person trips currently generated in Seattle, SOV trips are estimated to make up 40%. HOV trips are estimated to account for 28%. More than two-thirds of daily trips are made by private vehicle. Transit accounts for 11% of trips, walking for 19%, and biking for 2%.

Exhibit 3.10-11. Daily Person Trips by Mode—Existing Conditions

Mode	Person Trips	Mode Share
SOV	1,624,000	40%
HOV	1,169,000	28%
Transit	465,000	11%
Walk	776,000	19%
Bike	71,000	2%
Total	**4,105,000**	**100%**

Source: Fehr & Peers, 2023.

Active Transportation

The active transportation network is composed of a variety of facility types, some of which serve specific modes while others are shared-use among multiple modes. These include sidewalks, crosswalks, curb ramps, staircases, pedestrian/bicycle bridges, pathways, shared-use trails, protected bike lanes, striped bike lanes, and neighborhood greenways. Detail regarding each active transportation mode has been expanded in the following sections below.

Pedestrian Network

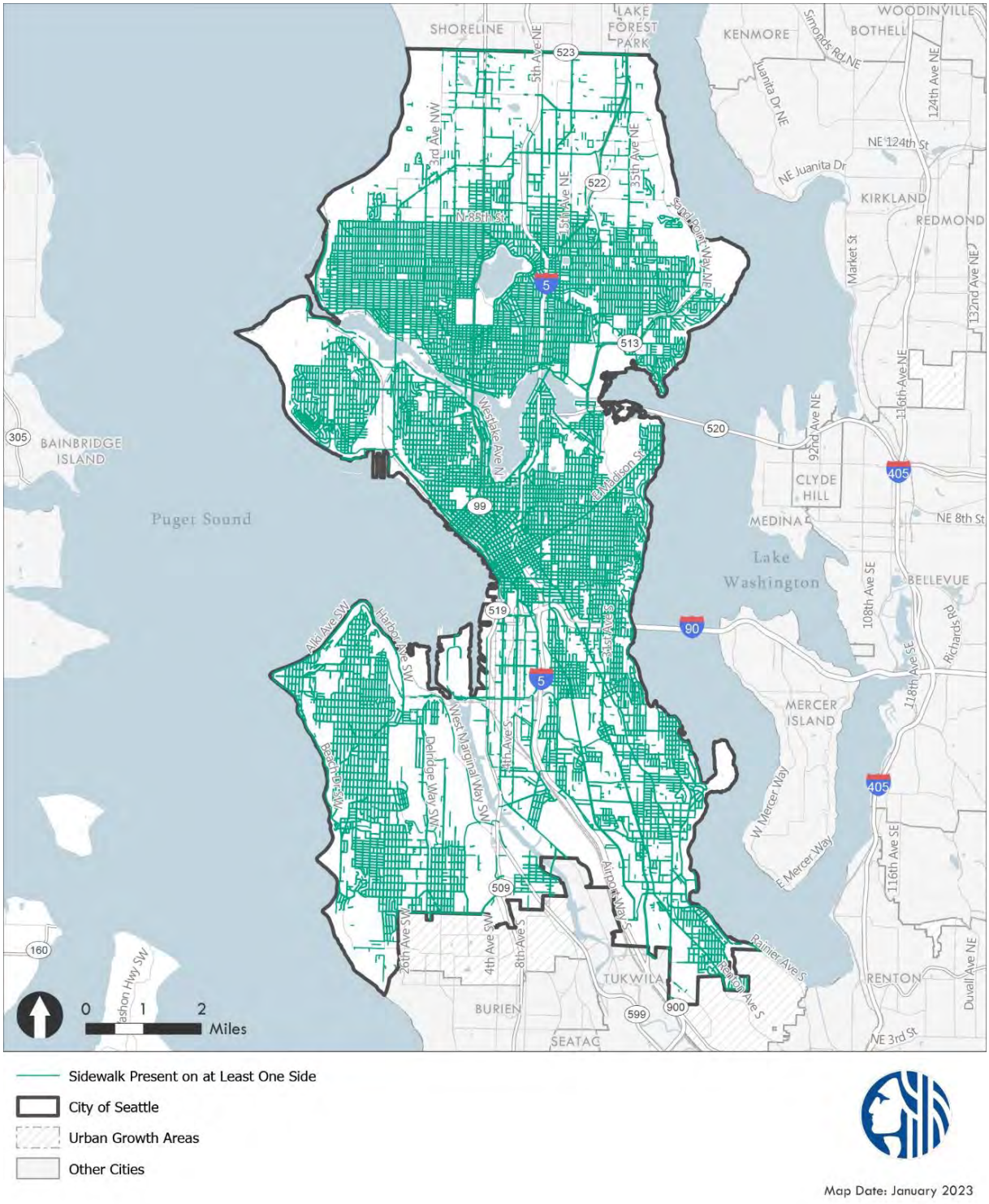
The Seattle pedestrian network is composed of sidewalks, crosswalks, staircases, pedestrian bridges, curb ramps, and trails. Seattle has over 2,000 miles of sidewalks. A map of the sidewalk facilities can be found in **Exhibit 3.10-12**. To view additional datasets related to pedestrian infrastructure, visit the Seattle Accessible Route Planner website. To evaluate the level of sidewalk network connectivity, GIS data was used to calculate the proportion of the sidewalk network that is complete, assuming a fully complete network would have a sidewalk on both sides of each roadway. The information has been summarized at the census tract level to evaluate trends in sidewalk network completion throughout the city. The results are shown in **Exhibit 3.10-13**. For the purposes of the EIS, sidewalk network completion percentages are categorized as follows:

- Low Completion: less than 50% complete
- Medium Completion: between 50% and 75% complete
- High Completion: greater than 75% complete

As shown in **Exhibit 3.10-12** and **Exhibit 3.10-13**, Seattle's pedestrian network is most complete in and around its regional centers and urban centers, including Downtown, South Lake Union, Capitol Hill, Uptown, University District, Northgate, Lake City, Fremont, Ballard, and North Rainier. These areas tend to have uninterrupted sidewalks with frequent pedestrian infrastructure including curb ramps, crosswalks, staircases, and pedestrian bridges.

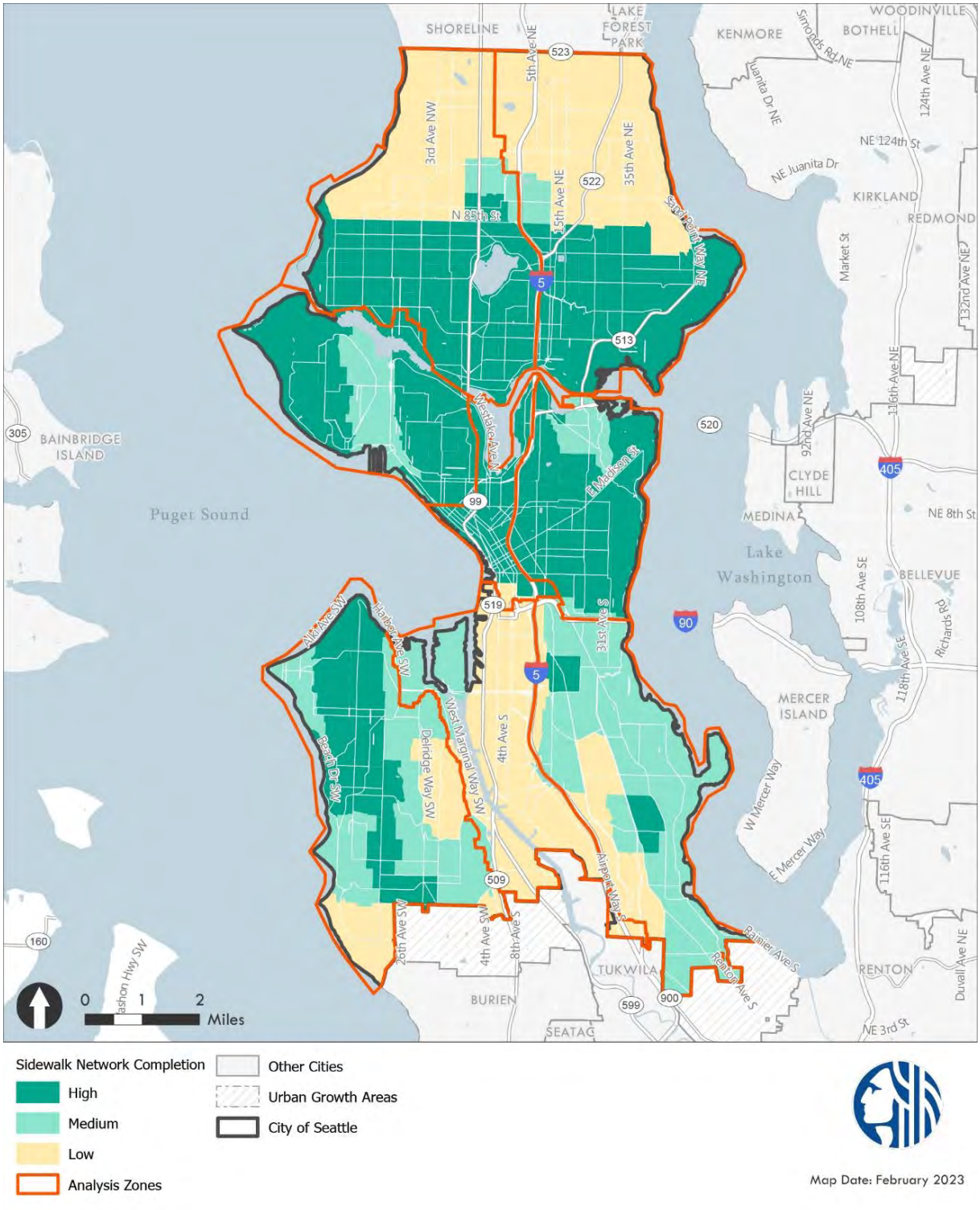
Some areas of the city lack connected networks. Those areas are primarily north of NE/NW 85th Street, Arbor Heights and the Delridge neighborhood in West Seattle, in industrial areas in the Duwamish and Ballard-Interbay MICs, and South Beacon Hill.

Exhibit 3.10-12. Existing Pedestrian Facilities, 2022



Source: Seattle Department of Transportation, 2022.

Exhibit 3.10-13. Existing Sidewalk Connectivity, 2022



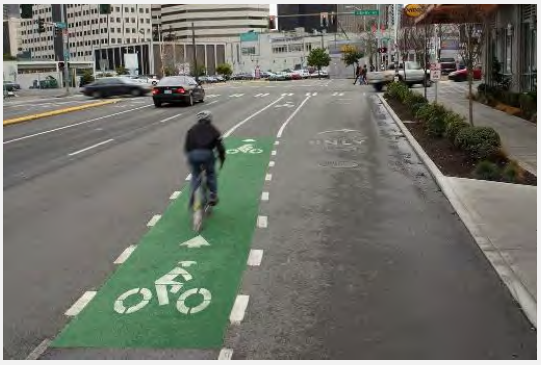
Source: Fehr & Peers analysis of Seattle Department of Transportation data, 2023.

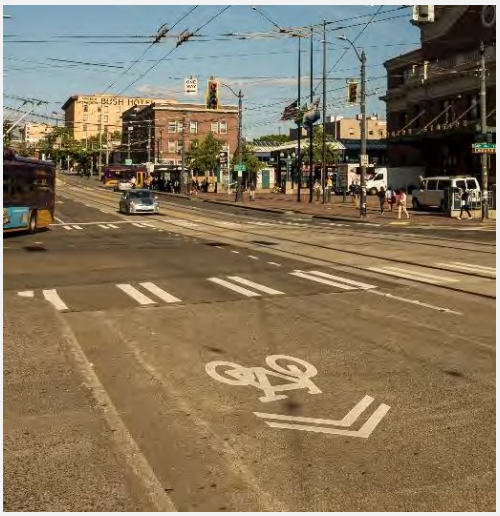
The Seattle Transportation Plan (STP), like the Pedestrian Master Plan (PMP) before it, designated a Priority Investment Network (PIN) to identify locations that are most in need of pedestrian improvements and therefore are the highest priority for investment. The STP identifies three types of PINs: a missing sidewalk PIN, a substandard sidewalk PIN, and an enhanced street crossings PIN. The PIN prioritization criteria include measures related to proximity to land use areas, safety, and equity ~~the following metrics: location within ¼ mile of a K-12 Seattle Public School, location along a Frequent Transit Network arterial, and proximity to Frequent Transit Network stops, and health and equity factors guided by the City's Race and Social Justice goals, and safety factors~~. ~~The maps of the PIN network for each subarea can be found in **Appendix H.1**.~~

Bicycle Network

Seattle aims to provide a connected network of bicycle facilities that serve all ages and abilities by providing a comfortable separation from motor vehicles as well as a focus on intersection safety along those routes. **Exhibit 3.10-14** provides descriptions and images of various types of bicycle facilities. SDOT defines Seattle's All Ages & Abilities network to include off-street trails, cycle tracks, and neighborhood greenways.

Exhibit 3.10-14. Bicycle Facility Type

Facility Type	Description	Example
Bike Lane	A conventional bike lane is a striped lane on a roadway that is designed for exclusive use by people riding bicycles.	
Protected Bike Lane/Cycle Track	Protected bike lanes are separated by vertical elements that provide further protection from motor vehicle traffic. Common vertical elements include vertical curbs, a painted buffer with planter boxes, and parked cars.	

Facility Type	Description	Example
Neighborhood Greenway	Neighborhood Greenways are low-volume and low-speed streets that are designated and designed to give people walking and biking travel priority. They incorporate signage, pavement markings, and traffic calming tools to improve the comfort and connectivity of the bicycle roadway network.	
Off-street Paths & Trails	Off-street paths and trails are shared use, paved facilities for the exclusive use of those who walk, bike, or roll. They are wide enough for two-way travel.	
Sharrow	Sharrows are pavement markings used to indicate a shared lane use for bicycles and vehicles.	

Source: Fehr & Peers, 2023.

Exhibit 3.10-15 displays the citywide bicycle network. The City of Seattle maintains data layers showing many forms of bicycle facilities. To explore the detailed data, the City's interactive GIS database can be accessed here: SDOT Bike Web Map.

Bicycle facilities are spread throughout the city and tend to be most prevalent in regional centers such as the center city area. The areas farthest from downtown, in addition to the Duwamish area, have the lowest access to these facilities. Trails are generally along the water (Lake Washington, Lake Union, Ship Canal, Puget Sound), while neighborhood greenways are predominantly in residential areas.

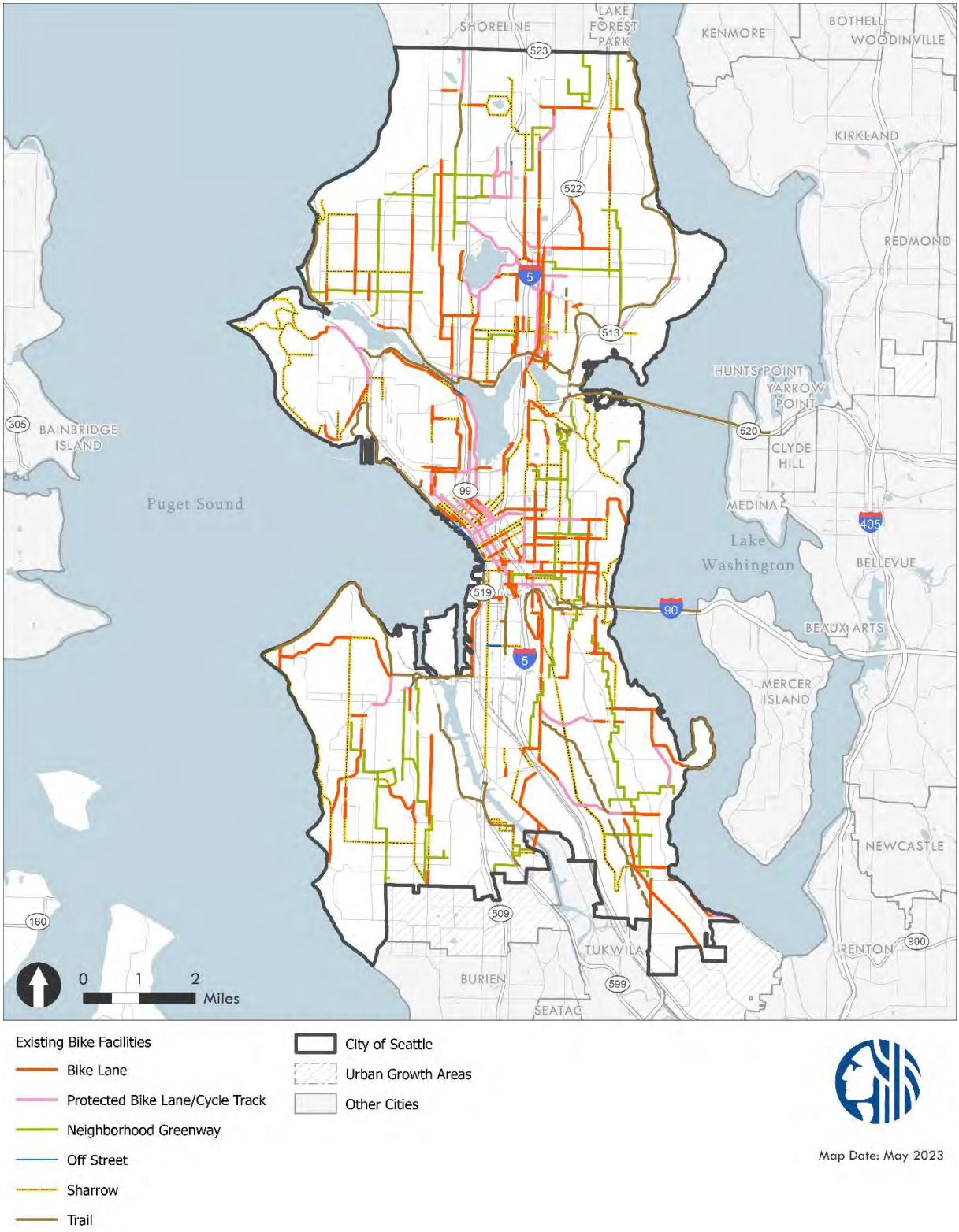
To gauge the current level of access to the All Ages & Abilities bicycle network, **Exhibit 3.10-16** displays the areas of the city within a quarter mile of any All Ages & Abilities facility. Of the approximately 503,000 households in Seattle, 75% (377,000) are within a quarter mile of a designated All Ages & Abilities facility. Approximately 86% of employees are within a quarter mile of an All Ages & Abilities facility. Although most households and employment locations are within a quarter mile of an All Ages & Abilities facility, not all facilities are connected to one another, creating gaps in the network.

~~As part of the City of Seattle's Bicycle Master Plan (BMP), t~~The City regularly produces implementation plans that evaluate the current progress towards overarching goals. This includes data on the 12 bike counters that SDOT maintains throughout Seattle. Four of the counters are also able to capture pedestrian counts.[78] From 2014 to 2019, bike ridership increased by 26%—the locations with the highest ridership were the Fremont Bridge and SW Spokane Street. After several years of increasing ridership, the City of Seattle experienced a decrease in bike ridership at those locations between 2019 and 2020, in line with the COVID-19 pandemic. With the 2020 numbers included, the bicycle ridership rate increased 4% from 2014 to 2020.[79]

[78] Seattle Department of Transportation. "Bike Counters." https://www.seattle.gov/transportation/projects-and-programs/programs/bike-program/bike-counters

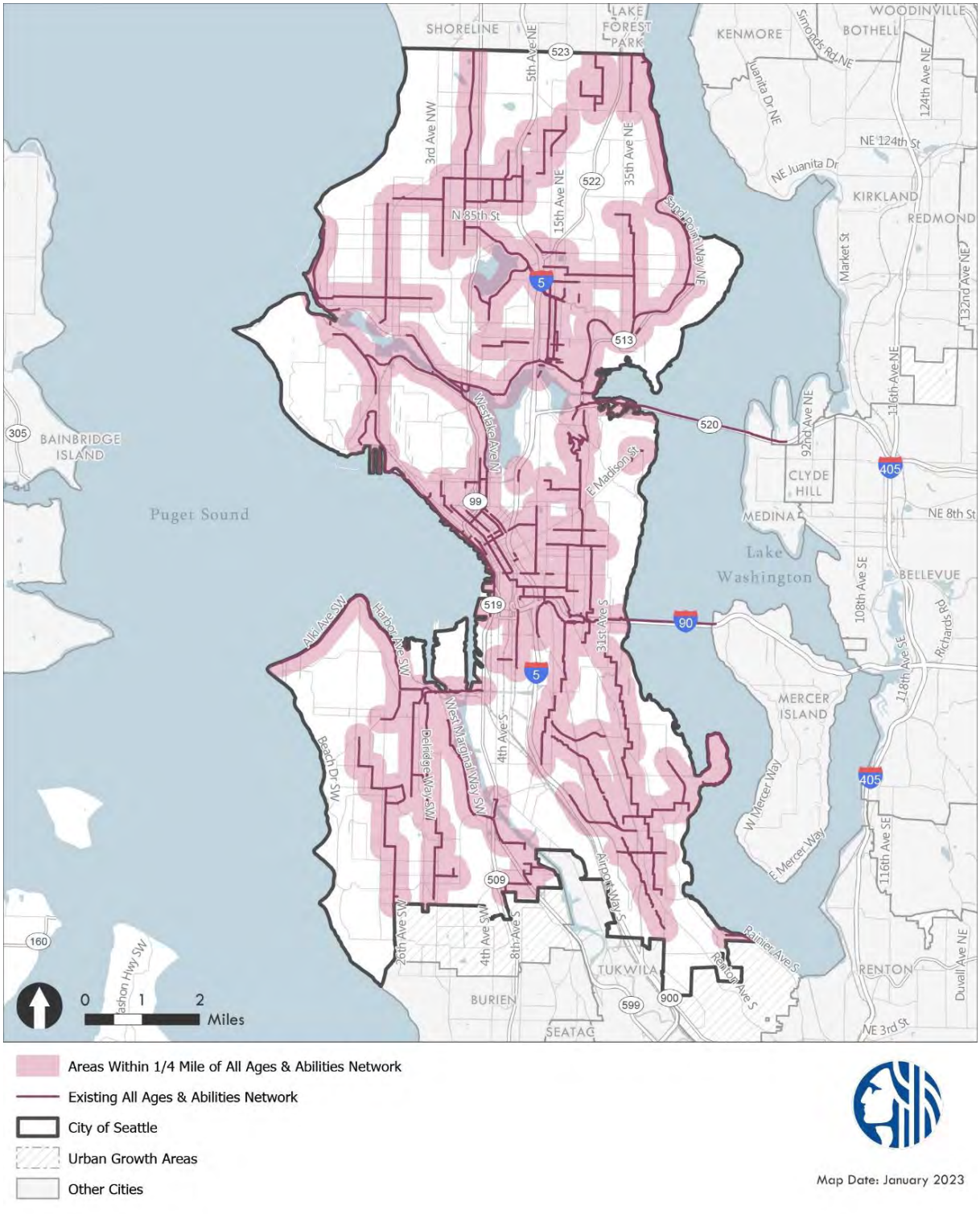
[79] Seattle Department of Transportation. 2021. "Seattle Bicycle Master Plan: 2021-2024 Implementation Plan." https://www.seattle.gov/documents/Departments/SDOT/BikeProgram/BMP_Imp_Plan_2021_FINAL.pdf

Exhibit 3.10-15. Existing Bicycle Facilities, 2022



Sources: Seattle Department of Transportation, 2022.

Exhibit 3.10-16. Existing All Ages & Abilities Network, 2022



Sources: Fehr & Peers analysis of Seattle Department of Transportation, 2022.

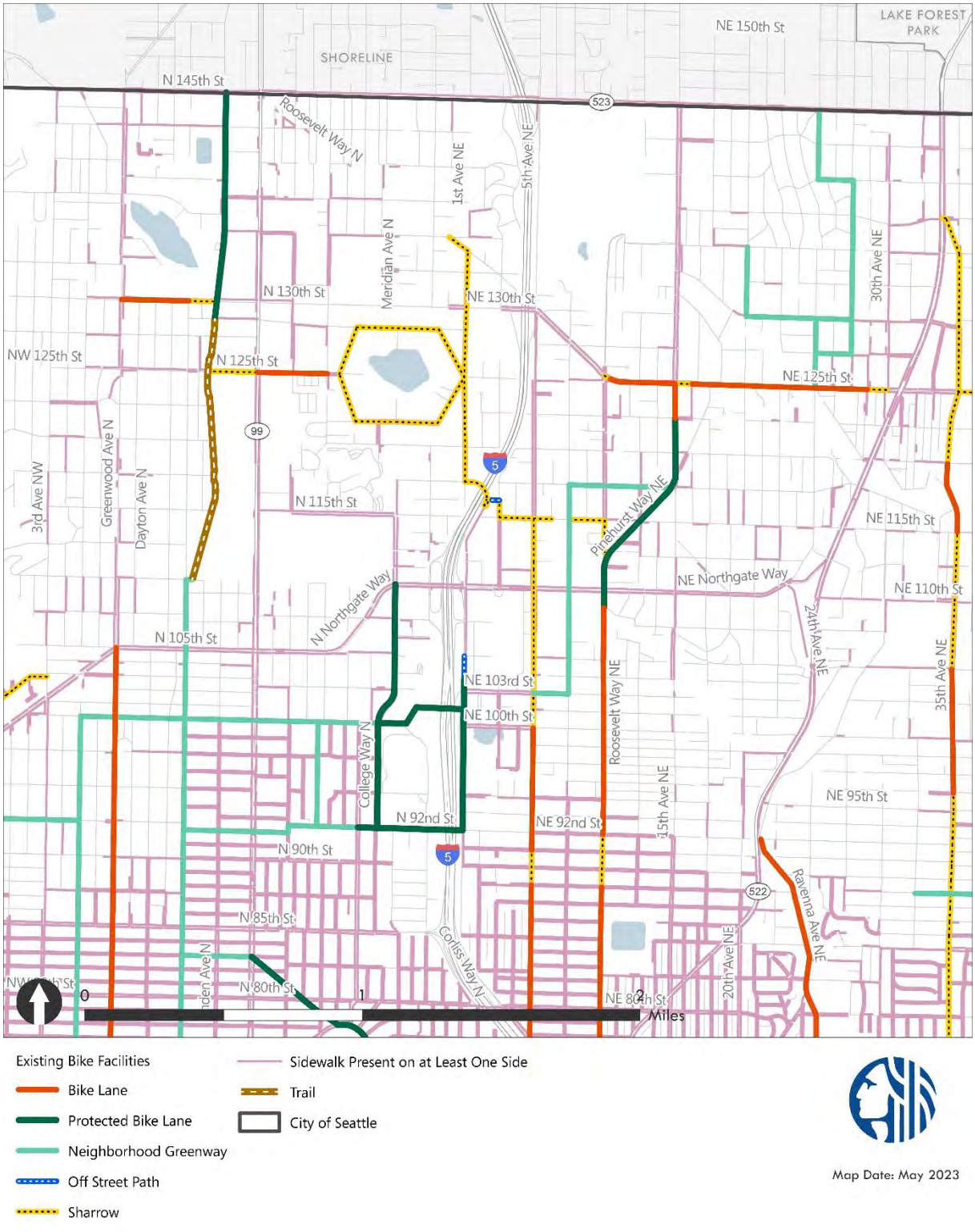
NE 130th / NE 145th Street Subarea

Exhibit 3.10-17 displays a map of the bicycle and pedestrian facilities within the subarea. In the NE 130th / NE 145th Street subarea, the pedestrian network has frequent gaps. Arterials such as NE 130th Street and Roosevelt Way NE have good sidewalk connectivity, but many north/south streets surrounding the area lack continuous sidewalks and ADA-compliant curb ramps. There are two planned sidewalk projects scheduled to be implemented in 2024: the first on 5th Avenue NE between NE 125th Street and NE 130th Street and the second on N 128th Street between Meridian Avenue N and Ashworth Avenue N.[80]

Within the 130th/145th subarea, there are bike lanes on NE 125th Street connecting to a protected bike lane on 15th Avenue NE and Pinehurst Way NE as well as several neighborhood greenways east of I-5. The All Ages & Abilities network is more limited on the west side of I-5. Additional protected and striped lanes are planned within the subarea.[81]

[80] Seattle Department of Transportation. "Sidewalk Development Program." https://www.seattle.gov/transportation/projects-and-programs/programs/pedestrian-program/sidewalk-development-program
[81] Seattle Department of Transportation. "SDOT Bike Map." https://seattlecitygis.maps.arcgis.com/apps/webappviewer/index.html?id=a24b25c3142c49e194190d6a888d97e3

Exhibit 3.10-17. NE 130th / NE 145th Street Subarea



Sources: Seattle Department of Transportation, 2022.

Transit

Seattle's public transit services are provided by King County Metro, Sound Transit, Community Transit, Kitsap Transit, and the City of Seattle. **Exhibit 3.10-18** displays Seattle's transit facilities.

Sound Transit's Link light rail serves the greater Seattle area with about 25 miles of rail coverage and 11.5 million annual riders in 2021. As of 2024, ~~T~~the 1 Line runs from ~~Northgate Station~~Lynnwood through the center city and south to Seattle-Tacoma International Airport and Angle Lake. The park-and-ride located at Northgate Station serves as a central hub for riders in the northern parts of the city.

Sound Transit plans to expand the Link light rail network in the next several years. The 1 Line will be extended ~~northward to Lynnwood and~~ southward to Federal Way, with a targeted opening of 2026~~4 or 2025~~. ~~This will include the NE 130th Street Station and Shoreline South/148th Station just north of the Seattle city limit.~~ The 2 Line, slated to ~~open~~ connect to the rest of the light rail system in 2025~~4~~, will run from Redmond to Northgate via Downtown Bellevue and Seattle. Additional expansions will incorporate the entire Everett to Tacoma corridor. Within Seattle, the Link network will be expanded to include lines to West Seattle and Ballard with expected completion dates of 2032 and 2037-2039, respectively.[82]

Transit Ridership

In 2019, the mode share of workers who arrived at Seattle's center city core between 6 AM and 9 AM by public transit was 46 percent (Commute Seattle 2019). The share of workers who drove alone to the city center was 26 percent. The COVID-19 pandemic has affected commuting behaviors since early 2020. Depending on the nature of the industry, many employers shifted to a full or partial remote format. Accordingly, this shaped the demand for travel during peak periods as well as the level of comfort people have sharing a space with other commuters. King County Metro reported a drop in ridership from over 123 million annual riders in 2019 to approximately 58 million riders in 2020. While transit ridership has begun to rebound since 2020, commuting patterns continue to evolve as remote and hybrid work has become more common in many workplaces.

King County Metro (KCM) operates fixed route bus service, on-demand transit, night service shuttles, and a limited number of ferry and rideshare programs. This includes three RapidRide routes connecting the center city to West Seattle (the C Line), Ballard (the D Line) and Shoreline along the Aurora Avenue corridor (the E Line). Seattle is also served by Community Transit bus routes that provide service north into Snohomish County and Kitsap Transit ferries to Kingston and Bremerton.

In addition to bus and light rail modes of public transit, the City of Seattle hosts a monorail as well as two streetcar lines: South Lake Union and First Hill.[83] At present, the two routes are not connected. However, there are plans in place to join the routes and provide north-south

[82] The Sound Transit Board completed a realignment process to adjust project timelines to reflect financial constraints. Depending on the ability to close the funding gap, service may open to Smith Cove in 2037 and Ballard in 2039. https://www.soundtransit.org/system-expansion/west-seattle-ballard-link-extensions/timeline-milestones

[83] Seattle Department of Transportation. "Seattle Streetcar." https://www.seattle.gov/transportation/getting-around/transit/streetcar#streetcar-reports

connectivity through the Center City Connector route. The Seattle Monorail is owned by the City of Seattle and is operated by Seattle Monorail Services (SMS). The Seattle Monorail serves a singular route between two stations: Seattle Center and Westlake Center. Both the Seattle Monorail and the Seattle streetcars accept ORCA card payment for the cost of fares.

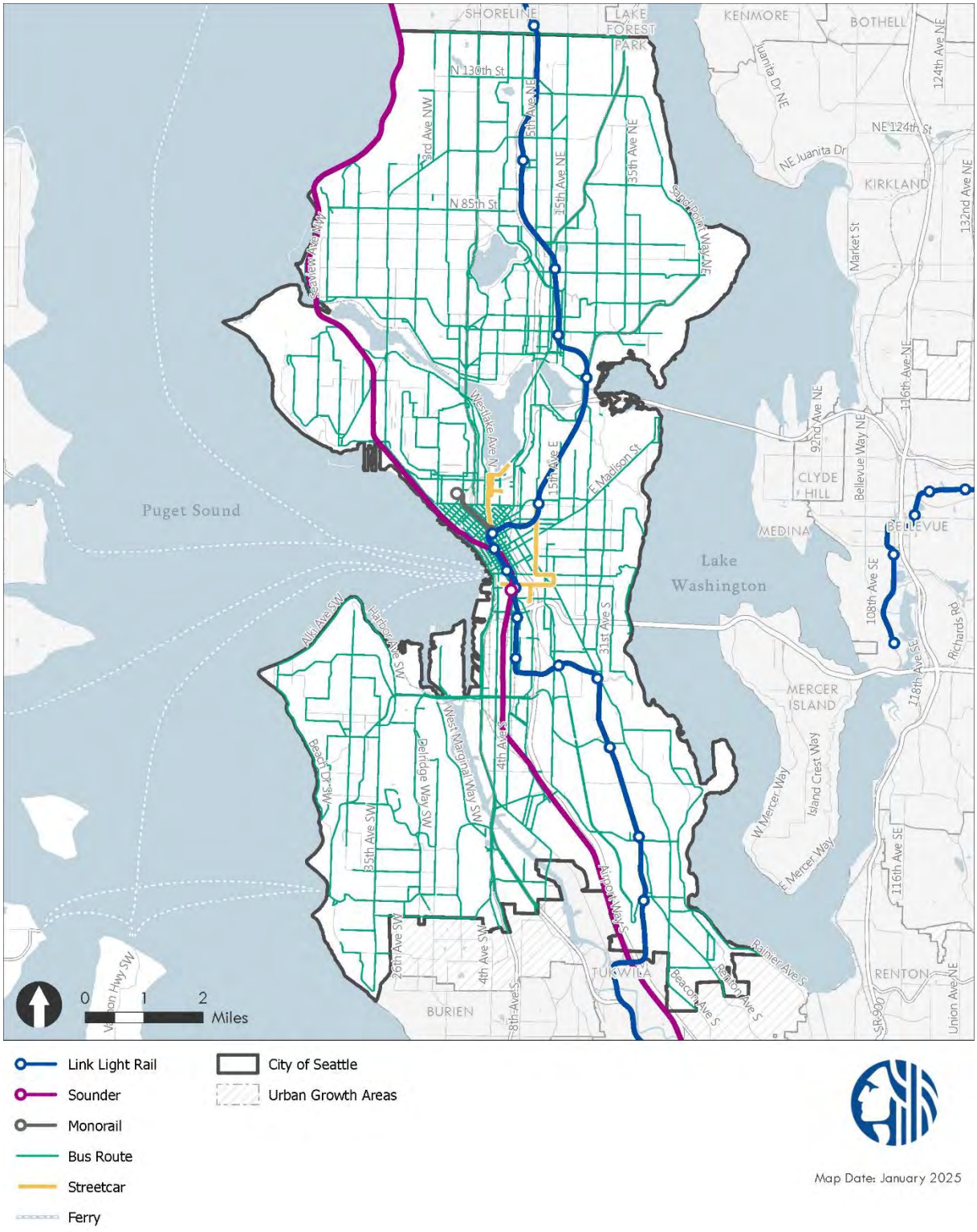
The Washington State Ferries (WSF) system serves many residents of the City of Seattle. The ferry system includes the following four routes, with Seattle service[84]:

- Seattle (Colman Dock) / Bainbridge Island
- Seattle (Colman Dock) / Bremerton
- Seattle (Fauntleroy Terminal) / Southworth
- Seattle (Fauntleroy Terminal) / Vashon

ORCA cards are accepted as a form of payment for all ferries, however there are some limitations for usage.[85]

[84] Washington State Department of Transportation. "Schedule By Route." https://wsdot.com/ferries/schedule/default.aspx
[85] Washington State Department of Transportation. "Wave2Go." https://wave2go.wsdot.com/webstore/landingPage?cg=21&c=76

Exhibit 3.10-18. City of Seattle Transit Service



Sources: Seattle Department of Transportation, 2023~~5~~.

On fixed route buses, KCM uses two separate measures of passenger loads: number of passengers compared to space on the bus; and the amount of time the bus has a standing load (i.e., more passengers than seats). For each trip, KCM further determines a passenger load threshold for overcrowding, based on the characteristics of the bus type scheduled for that trip. This threshold is determined by the number of seats on the bus and the number of standing people that can fit on the bus (assuming each standing person is given at least four square-feet of space). KCM considers these routes for further investment to alleviate overcrowding—this can be achieved by assigning a larger vehicle to the trip, adjusting the spacing of trips, or adding trips.

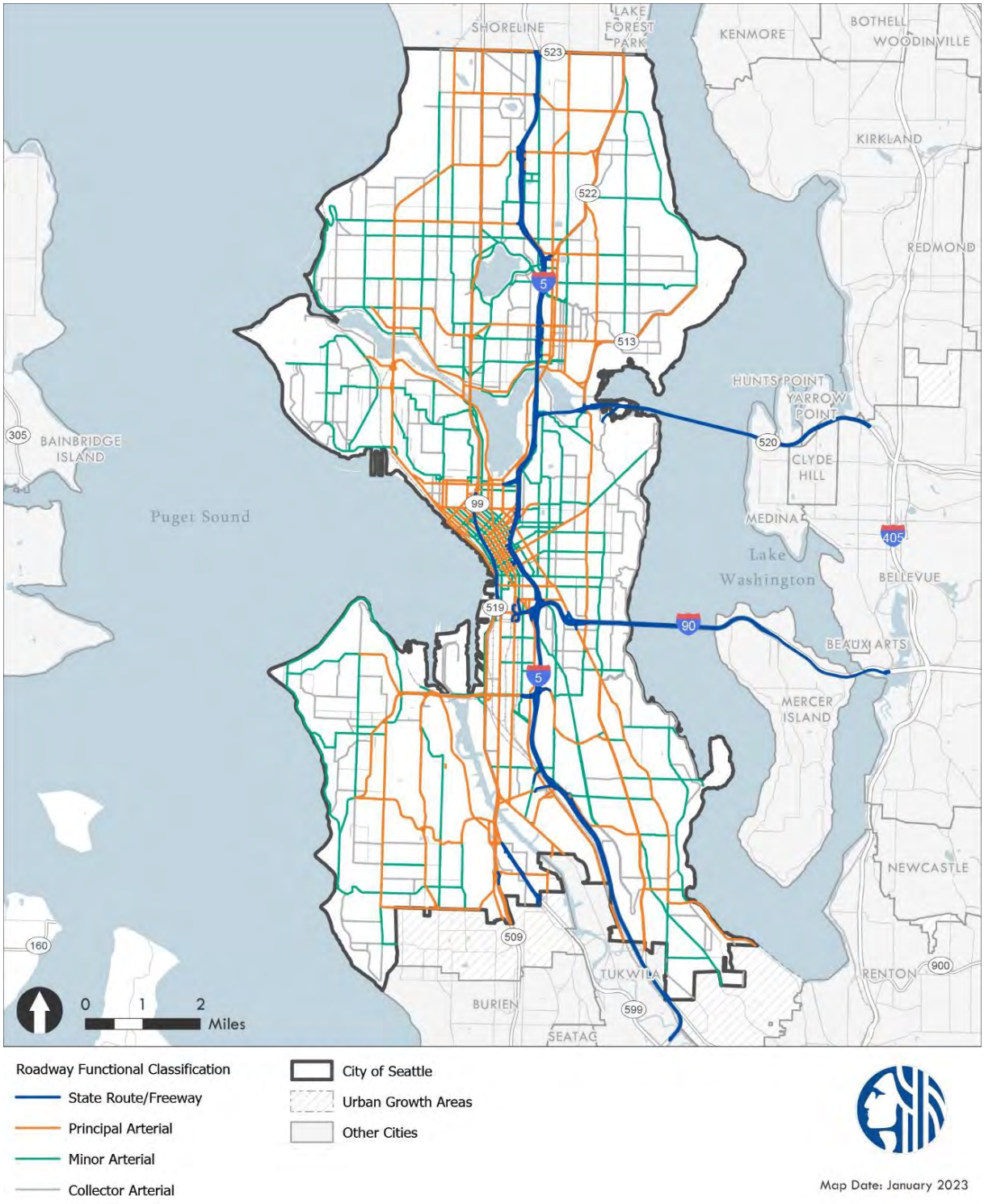
Based on Fall 2019 data, out of 57 bus routes operating in the City of Seattle, four routes had one trip that exceeded the crowding threshold during the PM peak period. These include:

- Route 40: Northgate to Downtown Seattle via Loyal Heights, Crown Hill, Ballard, Fremont and South Lake Union.
- Route 62: Sand Point to Downtown Seattle via View Ridge, Ravenna, Green Lake, Wallingford, Fremont and South Lake Union.
- Route 63: Northgate to Downtown Seattle via Maple Leaf, Ravenna and the University District (note this route stopped operating after the 2021 opening of the 1 Line to Northgate).
- Route 64: Lake City to Downtown Seattle via Wedgwood, Ravenna, University District and South Lake Union.
- **Appendix H~~.2~~** displays the inbound and outbound crowding summaries by bus route.

Roadway Users

The City of Seattle is served by a dense roadway system of principal, minor, and collector arterials, as shown in **Exhibit 3.10-19**. City arterials generally follow a grid pattern. Much of Seattle's transportation network is constrained by the waterways within and around the city. The Ship Canal divides north Seattle from the rest of the city, with six crossing points: the Ballard Bridge, the Fremont Bridge, State Route (SR) 99, Interstate 5 (I-5), the University Bridge, and the Montlake Bridge. Likewise, West Seattle is separated from the rest of the city by the Duwamish Waterway, and is accessed via the West Seattle Bridge, Spokane Street Bridge, the First Avenue S Bridge, and the South Park Bridge.

Exhibit 3.10-19. Arterial Classification, 2022



Sources: Seattle Department of Transportation, 2022.

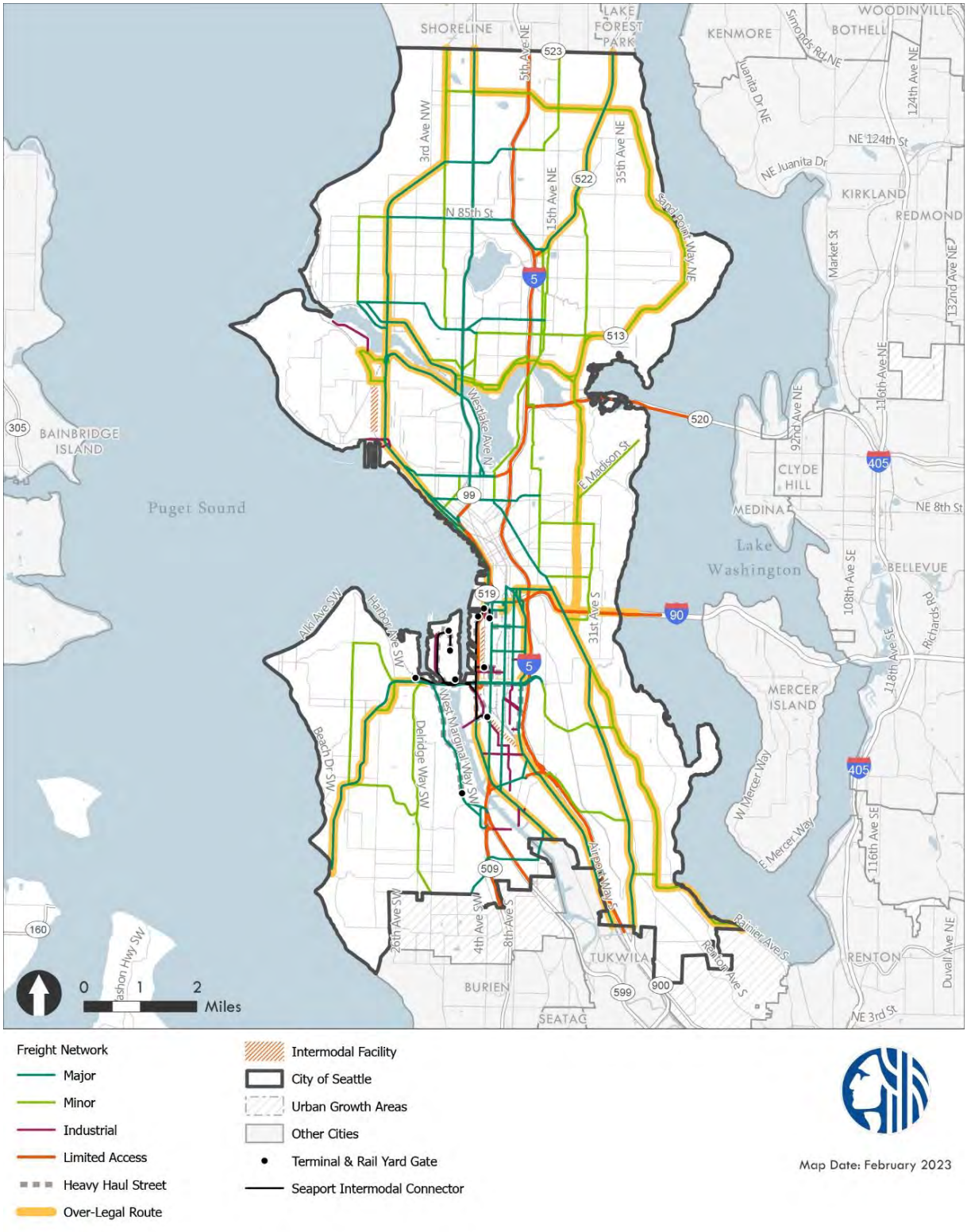
Freight

Seattle is a key port city along the West Coast and has two industrial zones that need ample transportation access to function: Ballard-Interbay-Northend and Duwamish Manufacturing and Industrial Centers (MICs). Seattle has designated a major truck street network throughout the city that carries a substantial amount of freight traffic. As shown in **Exhibit 3.10-20**, the freight network is comprised of state routes, interstates, and major arterials linking key freight destinations as well as intermodal facilities where freight is transferred among rail, truck, and ship. The map also shows terminal and rail yard gate locations, the heavy haul network, and over-legal routes.

Rail is also a critical mode for freight movement within the MICs. There are two Class 1 railroads in Seattle: BNSF and the Union Pacific Railroad (UP). The BNSF mainline extends north-south through Seattle and operates in a double-tracked tunnel through downtown, serving Balmer Yard in the BINMIC and SIG in the Duwamish MIC. The UP mainline only operates south of downtown Seattle and parallels the BNSF network, serving the Seattle ARGO Terminal. The MICs also include a variety of local rail spurs that provide direct rail service to businesses as well as on-dock rail at Port of Seattle terminals.

The BNSF and UP railroads cross roadways in many locations throughout the MICs. While at-grade crossings are more limited in the BINMIC, they are prevalent throughout the Duwamish MIC. When a train is passing through these locations, the crossing is closed to vehicle traffic resulting in delays to those on the roadway network, particularly truck freight in heavily industrial areas. Delays depend on the frequency and duration of the at-grade crossing closure and have been identified by the freight community as a key challenge for truck freight mobility.

Exhibit 3.10-20. Freight Network



Sources: Seattle Department of Transportation, 2022.

VMT / VHT / Average Trip Speed

Several metrics are used to evaluate the use of the road network: vehicle miles traveled (VMT), vehicle hours traveled (VHT), and average trip speed. VMT and VHT are calculated on a per capita basis to normalize each metric against the number of people living and working in Seattle.

Based on the base year PSRC travel demand model, Seattle is currently estimated to generate 22.2 million VMT each day. This equates to roughly 17.2 VMT per Seattle resident and worker. Total VHT is estimated to be 741,900 each day which equates to an average of 34 minutes of vehicle travel per person. The average speed of all trips generated is approximately 30mph. This includes travel on the highway system and local roadway network.

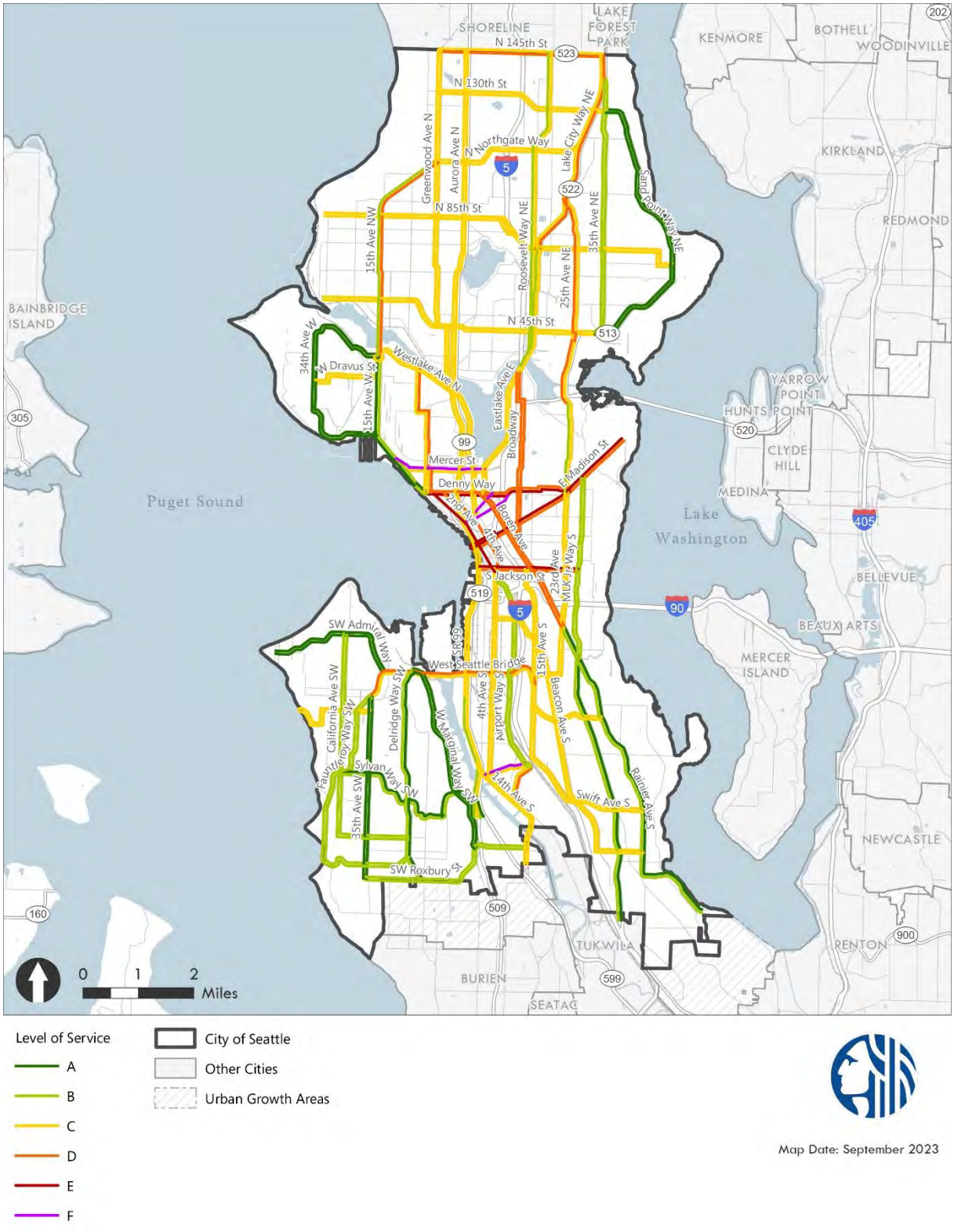
Telework & VMT

As a result of the COVID-19 pandemic, some workplaces have deviated from the typical in-person environment. As a result, commuting patterns have changed with increased telework opportunities. An analysis based on a recent household travel survey in the Sacramento region found that while workers who only telework generate substantially less VMT than workers who do not telework at all, workers who telework on some but not all days do not generate statistically less VMT than workers who do not telework at all.

Travel Time

PM peak hour corridor travel time results are summarized in **Exhibit 3.10-21** and **Exhibit 3.10-22**. As shown when mapped geographically, corridors closest to the center city tend to operate at LOS D through F with travel time generally improving in outlying neighborhoods. Corridors that cross waterways are also pinchpoints in the network and therefore tend to have lower LOS.

Exhibit 3.10-21. PM Peak Hour Corridor Travel Time, 2019



Sources: Fehr & Peers analysis of SDOT Iteris data, 2023.

Exhibit 3.10-22 PM Peak Hour Travel Time Corridor Level of Service

			Minutes / Level of Service	
Roadway	Extents		N/E	S/W
N 145th St	Greenwood Ave N	Lake City Way NE	10 / D	9.5 / C
N 130th St	Greenwood Ave N	35th Ave NE	11.5 / C	12 / C
N Northgate Way	Greenwood Ave N	Lake City Way NE	10.5 / C	10.5 / C
N 85th St	32nd Ave NW	Sand Point Way NE	24.5 / C	24.5 / C
N 45th St	32nd Ave NW	Union Bay Pl NE	23.5 / C	23.5 / C
15th Ave NW	W Emerson St	N 105th St	16 / D	10.5 / B
Greenwood Ave N	Nickerson St	N 145th St	26 / C	24 / C
Aurora Ave N	N 38th St	N 145th St	18.5 / C	15 / C
Roosevelt Way NE	Fuhrman Ave E	N 145th St	22 / C	20.5 / B
Lake City Way NE	NE 75th St	N 145th St	13.5 / D	10 / C
25th Ave NE	E Roanoke St	Lake City Way NE	14 / C	21 / D
35th Ave NE	Union Bay Pl NE	Lake City Way NE	16.5 / B	17 / B
Sand Point Way NE	Union Bay Pl NE	35th Ave NE	12.5 / A	12 / A
34th Ave W	15th Ave W	15th Ave W	11.5 / A	12 / A
W Dravus St	34th Ave W	15th Ave W	5 / C	4.5 / C
15th Ave W	Queen Anne Ave N	W Emerson St	9 / B	7.5 / A
Queen Anne Ave N	Denny Way	Nickerson St	12.5 / D	11.5 / C
SR 99	S Nevada St	N 38th St	13.5 / C	15 / C
Westlake Ave N	Stewart St	W Emerson St	16 / C	17 / C
Eastlake Ave E	Denny Way	Fuhrman Ave E	11.5 / C	10.5 / C
Broadway	Boren Ave	Eastlake Ave E	17.5 / D	17 / D
23rd Ave	E Madison St	E Roanoke St	6.5 / C	5 / B
Mercer St	Elliott Ave W	Fairview Ave N	7.5 / C	14 / F
Denny Way	Queen Anne Ave N	E Madison St	17 / E	16 / D
2nd Ave	4th Ave S	Denny Way	- / -	11.5 / E
4th Ave	S Jackson St	Denny Way	9 / D	- / -
Stewart St	1st Ave	Denny Way	- / -	6 / F
Olive Way	4th Ave	Denny Way	7 / F	- / -
E Madison St	Alaskan Way S	McGilvra Blvd E	20 / D	20 / E
Boren Ave	23rd Ave S	Denny Way	16 / D	14.5 / D
S Jackson St	Alaskan Way S	MLK Jr. Way S	8.5 / D	10.5 / E
23rd Ave	15th Ave S	E Madison St	14 / C	15.5 / C

Roadway	Extents		Minutes / Level of Service N/E	S/W
MLK Jr. Way S	Rainier Ave S	E Madison St	10 / B	11 / B
4th Ave S	E Marginal Way S	S Jackson St	12 / C	11.5 / C
Airport Way S	S Albro Pl	4th Ave S	10 / B	10 / B
15th Ave S	S Jackson St	Rainier Ave S	14.5 / C	16 / C
E Marginal Way S	S Holden St	S Nevada St	4.5 / C	4.5 / B
Swift Ave S	Rainier Ave S	S Columbian Way	13 / C	13 / C
Beacon Ave S	Rainier Ave S	4th Ave S	21.5 / C	24 / C
MLK Jr. Way S	S Boeing Access Rd	Rainier Ave S	14.5 / A	15.5 / B
Rainier Ave S	Cornell Ave S	23rd Ave S	17.5 / A	20 / B
S Michigan St	E Marginal Way S	Airport Way S	3.5 / C	4.5 / F
Ellis Ave S	E Marginal Way S	Airport Way S	3 / D	3.5 / C
14th Ave S	S Director St	1st Ave S	7 / C	7 / C
California Ave SW/SW Thistle St	Delridge Way SW	SW Admiral Way	17 / B	17 / B
Fauntleroy Way SW/SW Barton St	Delridge Way SW	35th Ave SW	15 / B	17 / B
35th Ave SW	SW Roxbury St	Fauntleroy Way SW	8.5 / A	9 / A
Delridge Way SW	SW Roxbury St	W Marginal Way SW	11 / A	13 / B
W Marginal Way SW	S Cloverdale St	Delridge Way SW	7.5 / A	8 / A
SW Admiral Way	63rd Ave SW	SW Manning St	6.5 / A	7 / A
West Seattle Bridge	35th Ave SW	15th Ave S	7.5 / C	10 / D
SW Alaska St	Beach Dr SW	35th Ave SW	7 / C	7.5 / C
Sylvan Way SW	California Ave SW	S Holden St	12 / B	10.5 / A
SW Roxbury St	35th Ave SW	14th Ave S	11 / B	10 / B

Source: Fehr & Peers analysis of SDOT Iteris data, 2023.

Screenlines

Exhibit 3.10-23 summarizes each screenline's LOS threshold and V/C ratio based on pre-pandemic observed counts. Almost all screenlines are below 90% capacity. Only three locations are estimated to exceed 90% capacity in one travel direction during the evening peak hour. These locations are all bridges crossing the Lake Washington Ship Canal—the Ballard Bridge, Fremont Bridge, and the Aurora Avenue Bridge which are currently operating at or near capacity. However, no screenlines currently exceed the established thresholds.

Exhibit 3.10-23. PM Peak Hour Screenline Volume-to-Capacity Ratios—Existing Conditions

Screenline	Screenline Location	Extents	V/C Threshold	Northbound/ Eastbound V/C Ratio	Southbound/ Westbound V/C Ratio
1.11	North City Limit	3rd Ave NW to Aurora Ave N	1.20	0.68	0.52
1.12	North City Limit	Meridian Ave N to 15th Ave NE	1.20	0.47	0.30
1.13	North City Limit	30th Ave NE to Lake City Way NE	1.20	0.84	0.47
2.00	Magnolia	Magnolia Bridge to W Emerson Place	1.00	0.56	0.61
3.11	Duwamish River	West Seattle Bridge & Spokane St	1.20	0.64	0.81
3.12	Duwamish River	1st Ave S & 16th Ave S	1.20	0.56	0.87
4.11	South City Limit	Martin Luther King Jr. Way to Rainier Ave S	1.00	0.57	0.75
4.12	South City Limit	Marine Dr SW to Meyers Way S	1.00	0.37	0.42
4.13	South City Limit	SR 99 to Airport Way S	1.00	0.44	0.45
5.11	Ship Canal	Ballard Bridge	1.20	1.01	0.71
5.12	Ship Canal	Fremont Bridge	1.20	1.00	0.79
5.13	Ship Canal	Aurora Ave Bridge	1.20	0.96	0.58
5.16	Ship Canal	University & Montlake Bridges	1.20	0.74	0.79
6.11	South of NW 80th St	Seaview Ave NW to 15th Ave NW	1.00	0.37	0.46
6.12	South of N W 80th St	8th Ave NW to Greenwood Ave N	1.00	0.57	0.49
6.13	South of NE 80th St	Linden Ave N to 1st Ave NE	1.00	0.54	0.49
6.14	South of NE 80th St	5th Ave NE to 15th Ave NE	1.00	0.71	0.56
6.15	South of NE 80th St	20th Ave NE to Sand Point Way NE	1.00	0.47	0.34
7.11	West of Aurora Ave	Fremont Pl N to N 65th St	1.00	0.53	0.65
7.12	West of Aurora Ave	N 80th St to N 145th St	1.00	0.41	0.41
8.00	South of Lake Union	Valley St to Denny Way	1.20	0.49	0.35
9.11	South of Spokane St	Beach Dr SW to W Marginal Way SW	1.00	0.45	0.71
9.12	South of Spokane St	E Marginal Way S to Airport Way S	1.00	0.51	0.54
9.13	South of Spokane St	15th Ave S to Rainier Ave S	1.00	0.56	0.57
10.11	South of S Jackson St	Alaskan Way S to 4th Ave S	1.00	0.61	0.64
10.12	South of S Jackson St	12th Ave S to Lakeside Ave S	1.00	0.52	0.64
12.12	East of CBD	S Jackson St to Howell St	1.20	0.36	0.36

Screenline	Screenline Location	Extents	V/C Threshold	Northbound/ Eastbound V/C Ratio	Southbound/ Westbound V/C Ratio
13.11	East of I-5	NE Northgate Way to NE 145th St	1.00	0.67	0.51
13.12	East of I-5	NE 65th St to NE 80th St	1.00	0.52	0.54
13.3	East of I-5	NE Pacific St to NE Ravenna Blvd	1.00	0.59	0.52
A1	North of Seneca St	1st Ave to 6th Ave	N/A	0.47	0.50
A2	North of Blanchard	Elliott Ave to Westlake Ave	N/A	0.43	0.31
A3	East of 9th Ave	Lenora St to Pike St	N/A	0.46	0.83
A4	South of Mercer St	Elliott Ave W to Aurora Ave N	N/A	0.53	0.46
A5	East of 5th Ave N	Denny Way to Valley St	N/A	0.40	0.40
A6	North of Pine St	Melrose Ave E to 15th Ave E	N/A	0.39	0.32
A7	North of James St– E Cherry St	Boren Ave to 14th Ave	N/A	0.46	0.32
A8	West of Broadway	Yesler Way to E Roy St	N/A	0.47	0.38
A9	South of NE 45th St	7th Ave NE to Montlake Blvd NE	N/A	0.56	0.53
A10	East of 15th Ave NE	NE 45th St to NE 52nd St	N/A	0.51	0.48
A11	South of Northgate Way (N/NE 110th St)	N Northgate Way to Roosevelt Way NE	N/A	0.44	0.46
A12	East of 1st Ave NE	NE 100th St to NE Northgate Way	N/A	0.43	0.48

Sources: Fehr & Peers, 2023.

Intersection LOS—NE 130th / NE145th Street Subarea

Exhibit 3.10-24 summarizes the existing LOS and delay for each of the 15 study intersections within the 130th/145th Subarea. Among the 15 intersections, only one intersection (N 145th Street and Meridian Avenue N) operates at LOS E or worse. All other intersections operate at LOS D or better.

Exhibit 3.10-24. 130th/145th Street Subarea PM Peak Hour Level of Service—Existing Conditions

Intersection ID	Intersection	Level of Service / Delay (seconds)
1	NE 155th St / 5th Ave NE	B / 11
2	N 145th St / Aurora Ave N	D / 47
3	**N 145th St / Meridian Ave N**	**E / 58**
4	N 145th St / 1st Ave NE	C / 21
5	NE 145th St / I-5 On & Off Ramps	D / 35
6	NE 145th St / 5th NE	D / 42
7	NE 145th St / 15th Ave NE	D / 48
8	N 137th St / Meridian Ave N / Roosevelt Way N	A / 7

Intersection ID	Intersection	Level of Service / Delay (seconds)
9	N 130th St / Aurora Ave N	D / 51
10	N 130th St / Meridian Ave N	A / 9
11	N 130th St / 1st Ave NE	D / 52
12	NE 130th St / I-5 On Ramp	A / 2
13	NE 130th St / Roosevelt Way NE / 5th Ave NE	C / 32
14	Roosevelt Way NE / NE 125th St / 10th Ave NE	B / 17
15	NE 125th St / 15th Ave NE	D / 41

Source: Fehr & Peers, 2023.

State Facilities

State facilities are evaluated to monitor performance and facilitate coordination between the city and state per the Growth Management Act. I-5 runs north-south throughout the city, serving both local and regional travelers. SR 99 also runs north-south through the city and tends to serve more locally focused trips. To the east, there are two bridges across Lake Washington: SR 520 and Interstate 90 (I-90). These four state facilities are all designated as Highways of Statewide Significance (HSS) by WSDOT, a designation that assists with funding allocation. Other HSS facilities within the city include SR 509 connecting the Duwamish area south to Sea-Tac Airport; SR 519 connecting Colman Dock to I-90; and SR 522 connecting North Seattle to communities to the northeast.

Exhibit 3.10-25 summarizes the average annual daily traffic (AADT) on each HSS that passes through the city. For I-5 and SR 99, multiple study locations were selected. The AADT were compared to the maximum service volume correlating to WSDOT's LOS standard (e.g., the maximum number of vehicles that can be served while maintaining a LOS D).

WSDOT sets the standard for most of the HSS facilities in Seattle at LOS D; the exception is the segment of SR 99 between SR 509 and I-5 which has a standard of "E mitigated" meaning congestion should be mitigated when PM peak hour LOS falls below LOS E. Because the volumes are compared to the maximum service volume for WSDOT's LOS standard, a ratio above 1.0 indicates the state facility is not meeting its LOS standard.

Based on these findings, the segments of I-5 over the Ship Canal Bridge and north of the West Seattle Bridge are exceeding the LOS D standard. SR 99 over the Aurora Avenue Bridge and SR 522 south of NE 145th Street are also exceeding their LOS D standards.

Exhibit 3.10-25. ~~PM Peak Hour~~Daily State Facilities Level of Service—Existing Conditions

Facility	Extents	WSDOT LOS Standard	Average Annual Daily Traffic (AADT)	Existing Volume to LOS Service Volume Ratio
I-5	North of NE Northgate Way	D	215,000	0.96
I-5	**Ship Canal Bridge**	**D**	**203,000**	**1.21**

Facility	Extents	WSDOT LOS Standard	Average Annual Daily Traffic (AADT)	Existing Volume to LOS Service Volume Ratio
I-5	**North of West Seattle Bridge**	**D**	**253,000**	**1.24**
I-5	North of Boeing Access Rd Ramp	D	200,000	0.93
I-90	Mt Baker Tunnel	D	148,000	0.90
SR 99	North of N Northgate Way	D	31,000	0.96
SR 99	**Aurora Ave Bridge**	**D**	**71,000**	**1.19**
SR 99	Tunnel	D	39,000	0.58
SR 99	North of West Seattle Bridge	D	67,000	0.72
SR 99	South of S Cloverdale St	E (mitigated)	32,000	0.42
SR 509	1st Ave S Bridge	D	60,000	0.97
SR 519	S Atlantic St West of I-90 Ramps	D	29,000	0.90
SR 520	Lake Washington Bridge	D	74,000	0.60
SR 522	**South of NE 145th St**	**D**	**34,000**	**1.01**

Source: WSDOT Transportation Data and GIS Office, 2019.

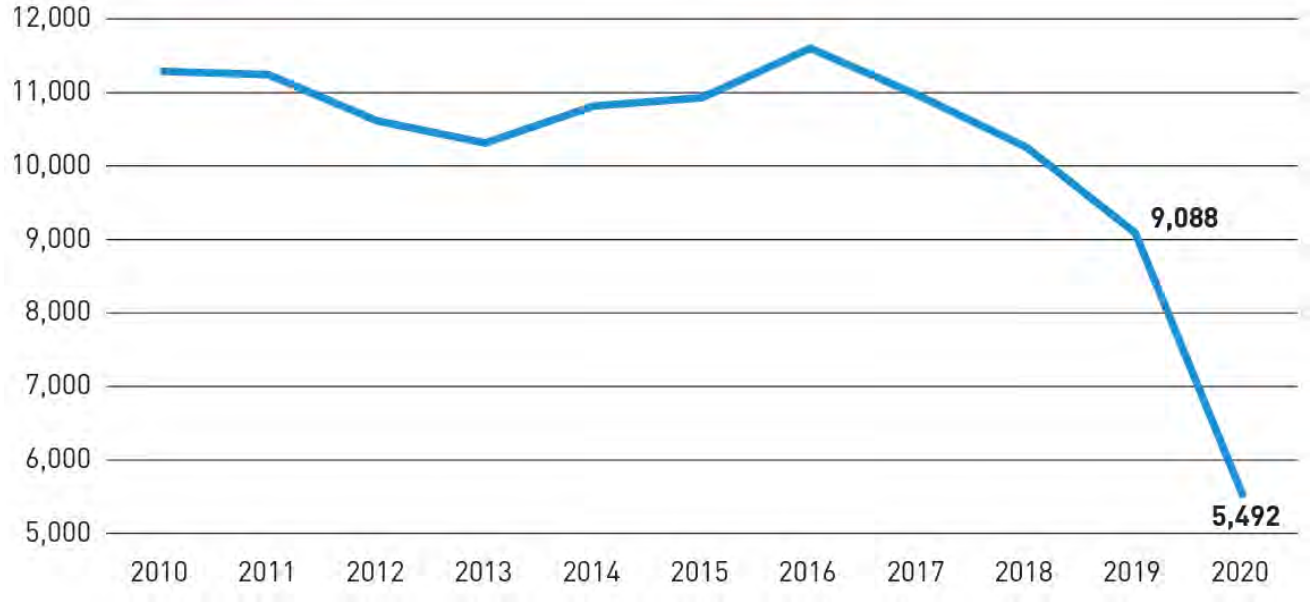
Safety

SDOT releases annual traffic reports that summarize citywide traffic information, including collision data. ~~The most recently released data comes from the 2021 traffic report, providing data through 2020.~~The traffic reports covering 2019 and 2020 were reviewed for this EIS. Due to the onset of the COVID-19 pandemic in 2020, the data covers a volatile period in terms of travel behavior. Accordingly, this section discusses both 2020 and 2019 data.

The total number of police reported collisions on Seattle streets had been decreasing since a peak in 2016 of about 11,500 collisions. In 2019, there were 9,088 reported collisions and 5,492 collisions in 2020.[86] This decrease in collisions between 2019 and 2020 can be attributed to the reduction in overall trips as a result of the COVID-19 pandemic. However, despite the lower total number of collisions in 2020, the collision rate reported in 2020 increased—in other words, there were more collisions per trip made. This is shown in **Exhibit 3.10-26** and **Exhibit 3.10-27**. In 2020, the collision rate is reported as 74.2 per million AADT trips and the 2019 collision rate is reported as 60.5 per million AADT trips.[87] Traffic-related fatalities in 2019 and 2020 were similar at 26 in 2019 and 25 in 2020, mostly among pedestrians both years.[88]

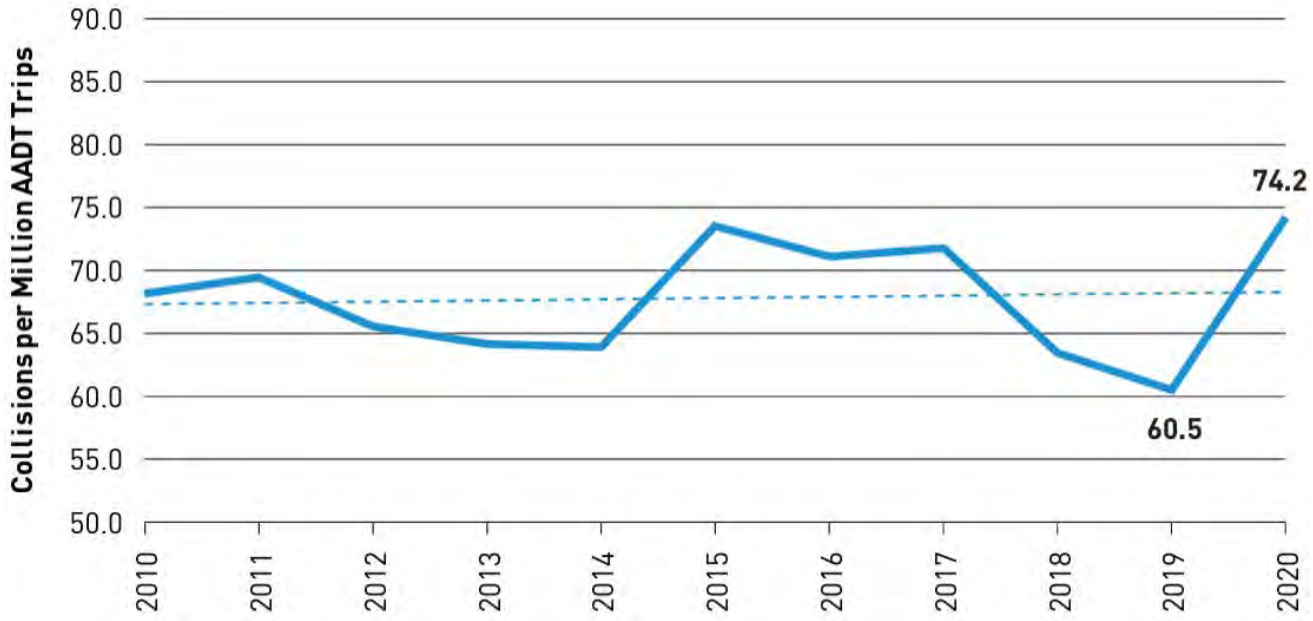
[86] Seattle Department of Transportation. 2022. "2021 Traffic Report." https://www.seattle.gov/documents/Departments/SDOT/About/DocumentLibrary/Reports/2021_Traffic_Report_ADA_21522.pdf (Page 22)
[87] Seattle Department of Transportation. 2022. "2021 Traffic Report." https://www.seattle.gov/documents/Departments/SDOT/About/DocumentLibrary/Reports/2021_Traffic_Report_ADA_21522.pdf (Page 23)
[88] Seattle Department of Transportation. 2022. "2021 Traffic Report." https://www.seattle.gov/documents/Departments/SDOT/About/DocumentLibrary/Reports/2021_Traffic_Report_ADA_21522.pdfhttps://www.seattle.gov/documents/Departments/SDOT/About/DocumentLibrary/Reports/2021_Traffic_Report_ADA_21522.pdf (Page 24)

Exhibit 3.10-26. Police Reported Collisions on Seattle Streets, 2010-2020



Source: SDOT, 2021 Traffic Report, 2022.

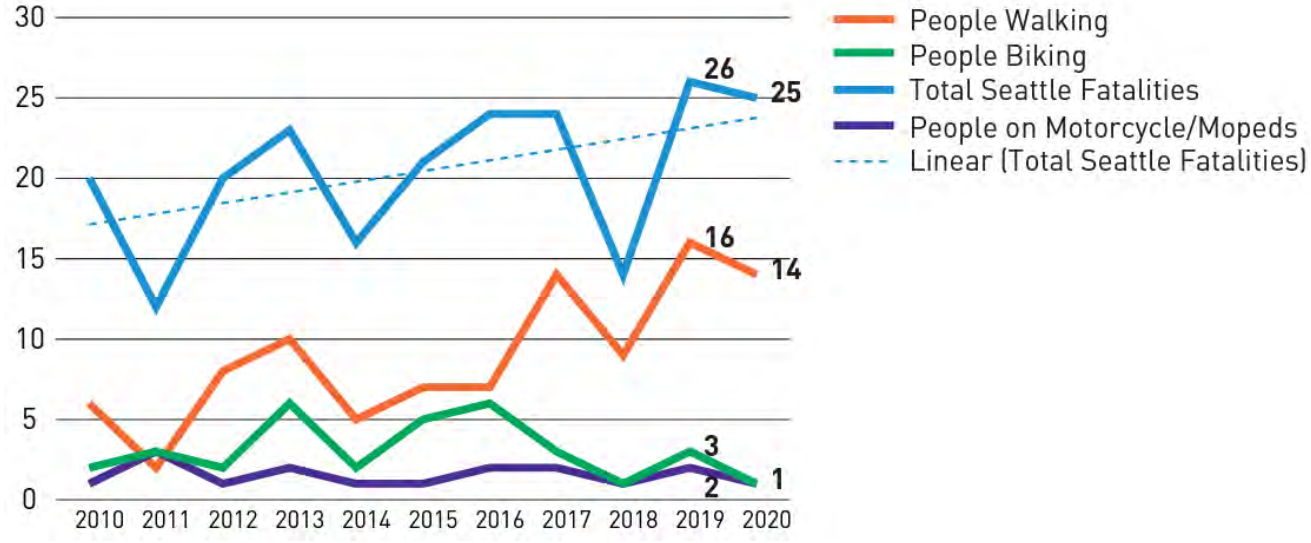
Exhibit 3.10-27. Citywide Collision Rate, 2010-2020



Source: SDOT, 2021 Traffic Report, 2022.

The report also summarizes trends among each mode, as shown in **Exhibit 3.10-28**. Over the past decade, fatalities on Seattle's streets have been increasing, particularly among people walking as they are among the most vulnerable in collisions with vehicles.

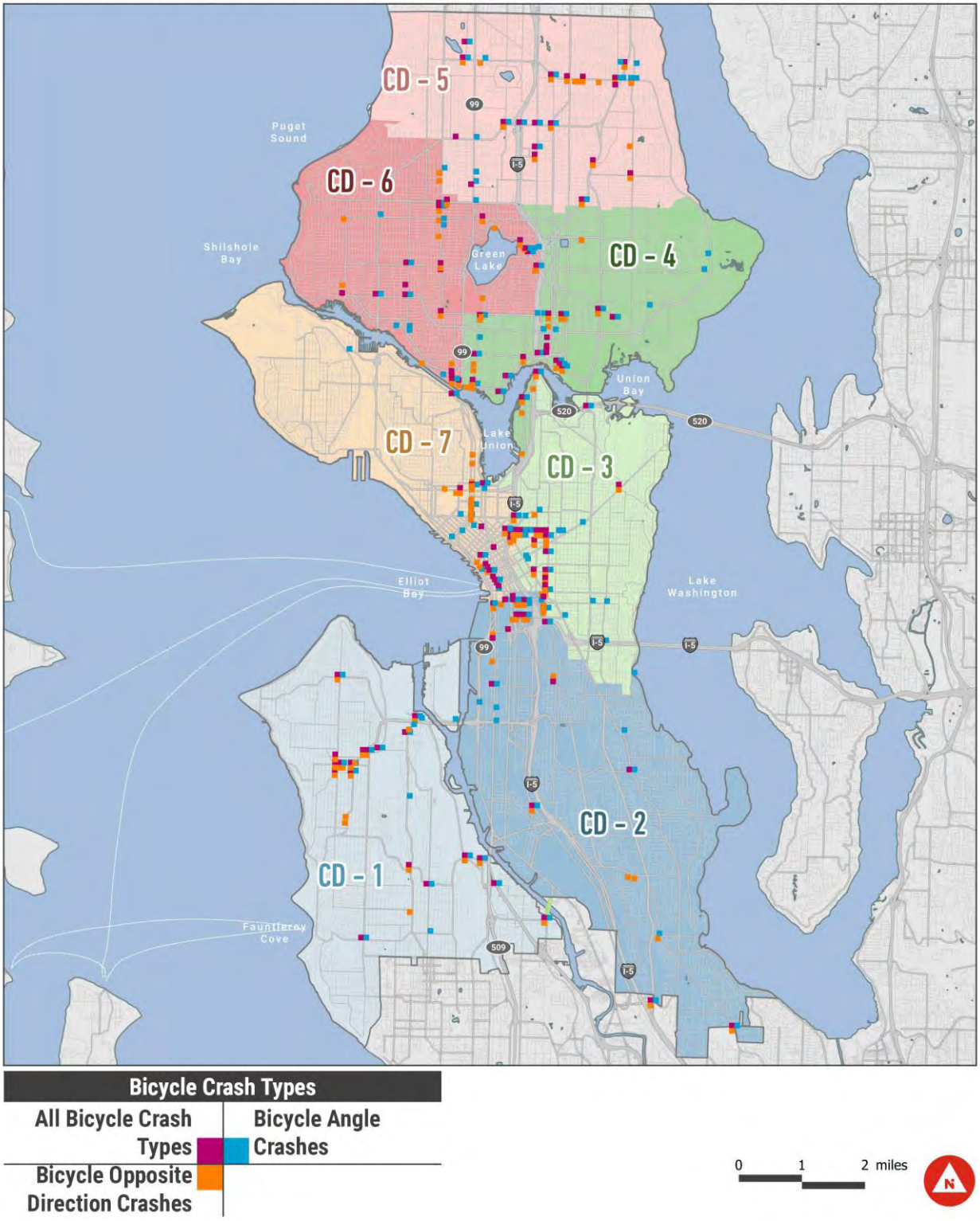
Exhibit 3.10-28. Traffic Fatalities on Seattle Streets, 2010-2020



Source: SDOT, 2021 Traffic Report, 2022.

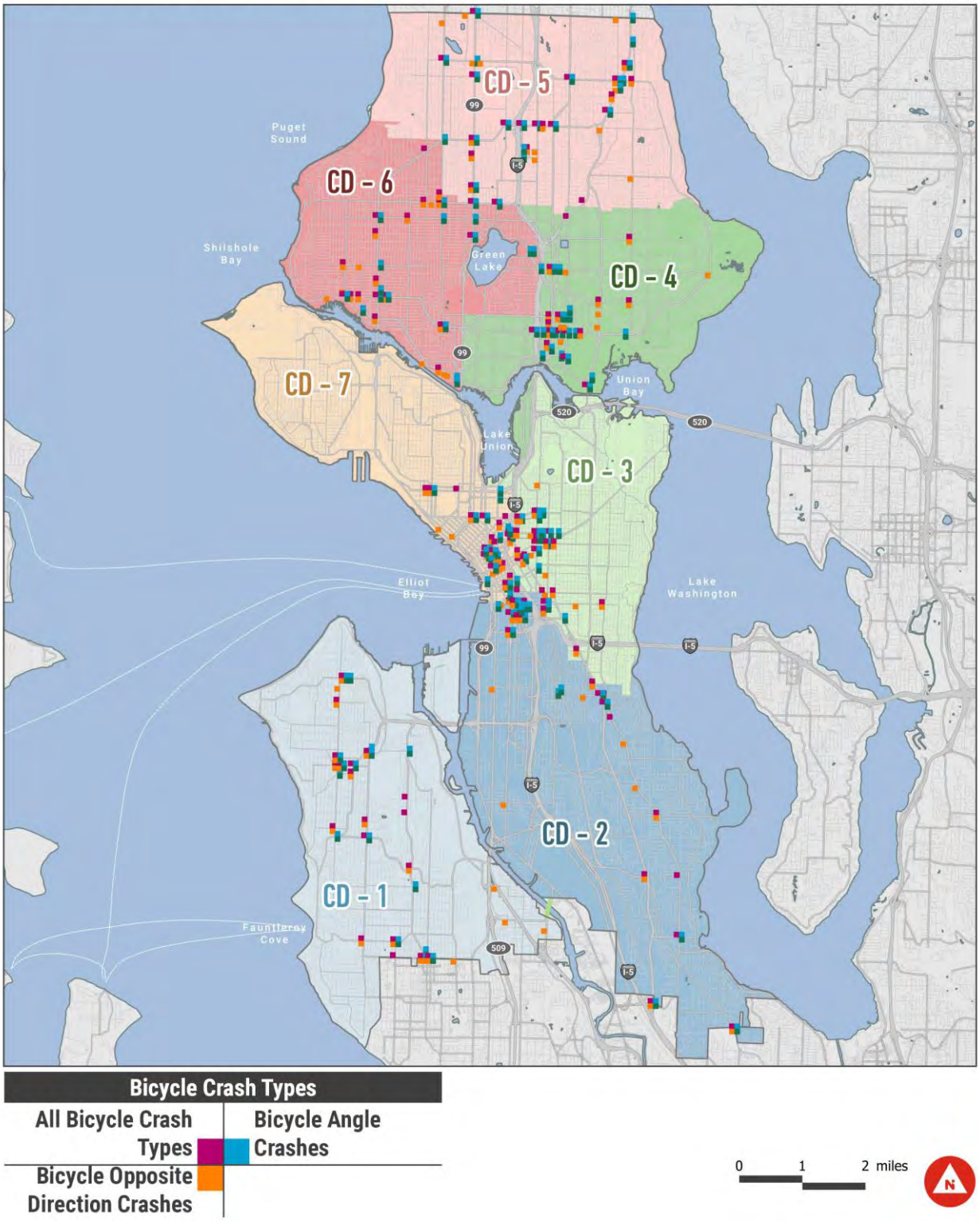
In 2020, SDOT released Phase 2 of the City of Seattle's Bicycle and Pedestrian Safety Analysis, providing statistical foundations for analyzing bicyclist and pedestrian collision data between 2010 and 2017. The analysis involved mapping the locations and types of bicycle and pedestrian collisions to determine priority locations for each council district. **Exhibit 3.10-29** and **Exhibit 3.10-30** display maps of collision locations by type in each council district. As part of the Vision Zero goal in place in the City of Seattle, SDOT is taking both proactive and reactive measures to eliminate serious injuries and fatalities from Seattle's streets.

Exhibit 3.10-29. Top 20 Priority Bicycle Locations Per Council District



Source: SDOT, City of Seattle Bicycle and Pedestrian Safety Analysis Phase 2, 2020.

Exhibit 3.10-30. Top 20 Priority Pedestrian Locations Per Council District



Source: SDOT, City of Seattle Bicycle and Pedestrian Safety Analysis Phase 2, 2020.

3.10.2 Impacts

This section discusses the potential impacts of each of the future year alternatives. Each of the action alternatives (Alternatives 2 through 5 and the Preferred Alternative) are measured against the expected conditions of the No Action Alternative (Alternative 1). While there is uncertainty inherent in any analysis of future travel behavior, this EIS uses the best available tool, the PSRC travel model, as a consistent basis to evaluate the future year alternatives. In particular, the model is best used to identify relative differences among alternatives rather than provide a specific prediction of the exact location and magnitude of impacts, particularly given this is a programmatic EIS assessing areawide changes rather than specific development proposals which are unknown at this time.

Analysis Methodology & Planning Scenarios Evaluated

For the Draft EIS, five alternatives ~~are~~ were evaluated under future year 2044 conditions for each of the key metrics. The same transportation network ~~i~~was assumed under each alternative. That network includes all existing facilities plus those considered to be reasonably foreseeable by the 2044 horizon year based on adopted plans at the time of analysis. The 2044 transportation network used in the Draft~~is~~ EIS is consistent with the assumptions used for the Seattle Transportation Plan (STP) EIS No Action Alternative. More details describing each alternative can be found in **Chapter 2**.

Per **Section 2.4.8 Transportation Planning & Alternatives**, the City evaluated its transportation plan in a separate EIS in February 2024. For this Final EIS, the City identified a Preferred Alternative to be evaluated which includes a growth strategy, updated Comprehensive Plan elements, and development code updates. In addition, since the Draft EIS was published in March 2024, the City adopted the Seattle Transportation Plan (STP). The long-term STP concepts are implemented during the 20-year planning period by the Transportation Element and Capital Facilities Plan. Thus to consider land use and transportation elements together, the SoundCast travel demand model was updated for this Final EIS to reflect the network maps, policy direction, and candidate projects identified in the STP. While the specific project list will be refined over time, the revisions to the model reflect the overarching goals of the STP to make active transportation and transit more convenient choices for Seattle residents and employees. Therefore, the revised model reflects the reallocation of some general purpose roadway capacity to become dedicated transit (or transit and freight) lanes which provide better speed and reliability for those modes, increase the capacity to move people along a corridor, and accommodate increased growth. As required, the City would prepare additional analysis and take public and stakeholder input into consideration before implementing specific transportation improvement projects, whether they are included in the STP or identified as mitigation for an action alternative. SDOT may choose not to pursue the projects assumed for modeling purposes due to potential impacts and future outcomes from community engagement, but they are used as a reasonably likely assumption to assess the proposed land use alternative.

Because the focus of this EIS is the Comprehensive Plan land use proposal, the STP assumptions were incorporated into an updated Alternative 1, No Action, as well as the Preferred Alternative models. The updated Alternative 1, No Action, is the baseline for comparison to isolate the effects that can be expected as a result of the Preferred Alternative.

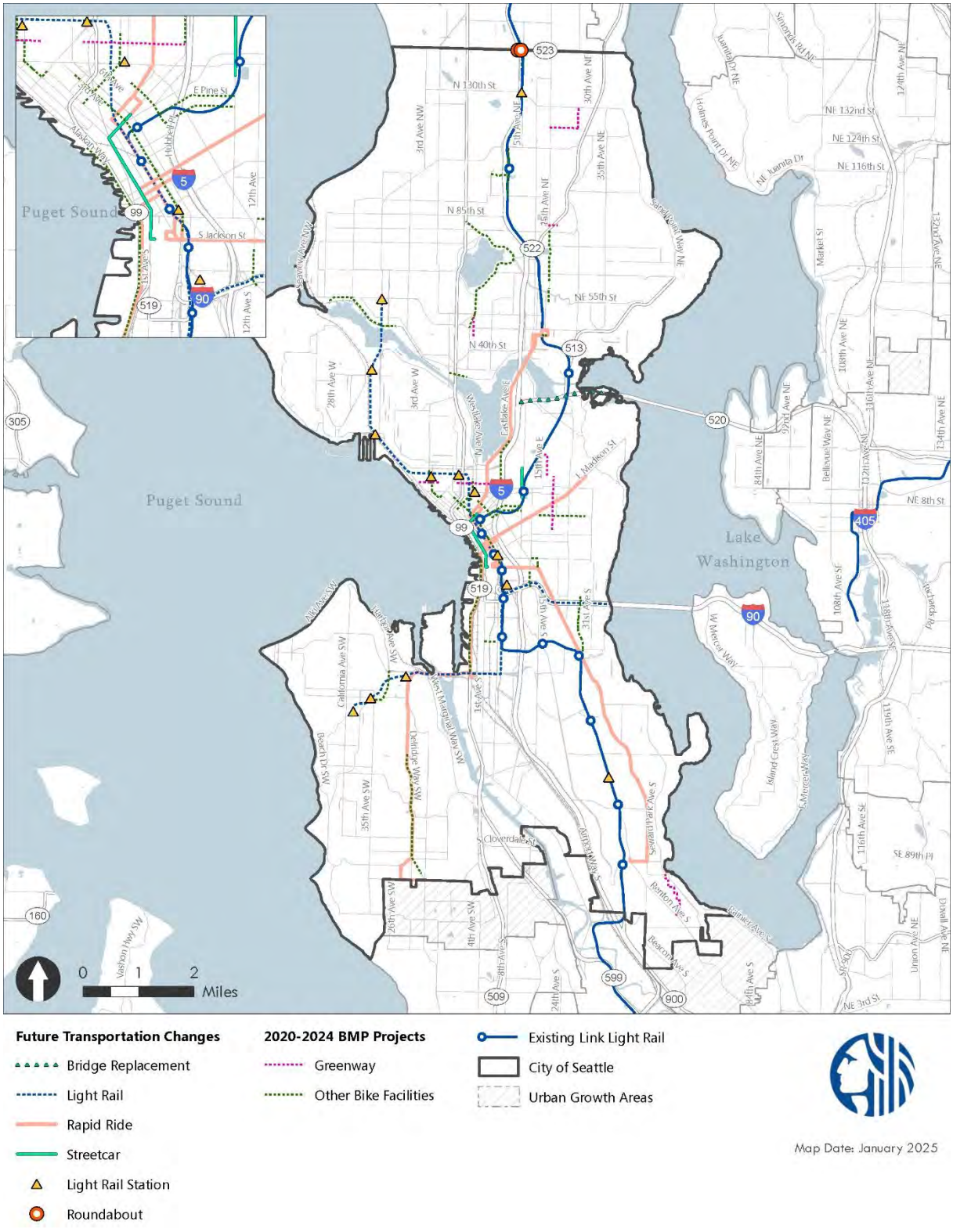
Travel Demand Forecasting

As described in the **Data & Methods** section, the PSRC's regional travel demand model, SoundCast, was used to develop travel forecasts for each of the future year alternatives. The model covers the four-county region of King, Kitsap, Snohomish, and Pierce counties. SoundCast is an activity-based model which estimates travel behavior across the region based on characteristics of individual persons and their households. The model produces detailed trip diaries for each simulated person in the region throughout an average weekday tracking the departure time, starting location, ending location, travel mode, and any other people sharing that trip.

SoundCast accounts for the household and employment forecasts for each future year alternative within the City of Seattle and is consistent with regional assumptions from PSRC for the areas outside city limits. The model also incorporates planned transportation facilities into the model network, such as the Link light rail extensions to Ballard and West Seattle. The projects assumed to be in place by 2044 for the Draft EIS alternatives are shown in **Exhibit 3.10-31**. See the previous section for a description of the additional network changes assumed for the Final EIS modeling.

The purpose of this EIS is to compare impacts among the future year alternatives. Relative to prior travel demand model frameworks developed by PSRC, SoundCast projects substantially higher transit usage in the future. While future travel behavior cannot be definitively known, these travel behavior assumptions underly the modeling for all future year alternatives, providing a consistent basis for comparison across the alternatives. A sensitivity test is included ~~at the end of the document~~ to explore how effects may differ with a lower transit mode share and higher vehicle mode share.

Exhibit 3.10-31 Planned Transportation Improvements for Draft EIS Alternatives, 2044



Source: City of Seattle, 2025~~3~~.

Although not individually modeled, the potential impacts of Alternative 4 are expected to fall between the other action alternatives due to the overall magnitude of growth and pattern of density. The citywide growth total for Alternative 4 is equivalent to Alternative 2 and Alternative 3, while Alternative 5 and the Preferred Alternative have higher growth. The pattern of growth assumed in Alternative 4 falls between the more concentrated growth of Alternative 2 and more dispersed growth of Alternative 3. Therefore, the potential impacts under Alternative 4 are expected to fall within the results for Alternatives 2, 3, and 5.

Thresholds of Significance

This section outlines the thresholds used to determine the impacts of No Action Alternative, as well as the four action alternatives. The expected conditions under the No Action Alternative are used as the baseline against which each of the action alternatives (Alternatives 2 through 5 and the Preferred Alternative) are measured. In addition to the quantitative thresholds defined below, potential impacts to active transportation and safety are addressed qualitatively.

A significant transportation impact under the No Action Alternative is identified if:

- A subarea would have a percentage of SOV travel exceeding the target stated in the Seattle 2035 Comprehensive Plan.
- A study route would operate over the transit agency crowding threshold.
- VMT per capita exceeds the existing level.
- A corridor would have a travel time LOS grade of F.
- A screenline would exceed the V/C threshold stated in the *Seattle 2035* Comprehensive Plan by at least 0.01.
- A signalized intersection would operate at LOS E or F and an unsignalized intersection would operate at LOS F.
- A state facility does not meet the standard set by WSDOT.

A significant transportation impact under the ~~four~~ action alternatives is identified if:

- A subarea that does not exceed its SOV mode share target under the No Action Alternative would exceed its SOV mode share target or a subarea that exceeds its SOV mode share target under the No Action Alternative would have an increase in SOV mode share of at least 1% compared to the No Action Alternative.
- A study route that would operate at or under the transit agency crowding threshold under the No Action Alternative would operate over the transit agency crowding threshold or a study route identified as operating over the transit agency crowding threshold under the No Action Alternative would have an increase in passenger load of at least 5% compared to the No Action Alternative.
- VMT per capita would exceed the VMT per capita under the No Action Alternative.

- A corridor that would have a travel time LOS grade of A-E under the No Action Alternative would operate at LOS F or a corridor that would have a travel time LOS grade F under the No Action Alternative would have an increase in travel time of at least 5%.
- A screenline that would not exceed the V/C threshold under the No Action Alternative would exceed the V/C threshold or a screenline that would exceed the V/C threshold under the No Action Alternative would increase the V/C ratio by at least 0.01.
- The action alternative would cause an intersection that operated acceptably under No Action Alternative to operate unacceptably, or the action alternative would add at least a 5 second delay from the No Action Alternative at an intersection that operated unacceptably under the No Action Alternative.
- A state facility that would meet WSDOT's standards under the No Action Alternative would exceed WSDOT's standards or a state facility that does not meet WSDOT's standards under the No Action Alternative would increase the volume-to-LOS service volume ratio by at least 0.01 compared to the No Action Alternative.

Impacts Common to All Alternatives

The following section describes impacts common to all alternatives.

Active Transportation

SDOT is continually planning and implementing improvements to active transportation facilities through various plans and programs such as ~~through the Pedestrian Master Plan (PMP), Bicycle Master Plan (BMP),~~the Vision Zero safety programs, ~~and~~ subarea planning efforts, and the recently adopted Seattle Transportation Plan (STP). ~~The modal plans are currently being integrated into a citywide transportation plan that will bring together the individual plans into a single document.~~

As described in the **Affected Environment** section, SDOT has identified ~~the PMP identifies a Priority Investment Network (PIN) which designates~~many street segments that should be prioritized for investment. However, the ability to implement investments is constrained by the high cost of infrastructure. ~~SDOT publishes a BMP Implementation Plan every two years detailing the infrastructure projects that will be constructed over the following four years.~~ It is assumed that the City will continue to implement ~~both~~ its envisioned ~~PMP and BMP~~pedestrian and bicycle network under whichever alternative is pursued, though the pace of improvements will vary over time depending on funding availability. Sound Transit's light rail extensions to Ballard and West Seattle are planned to be complete by 2044, providing frequent, high-capacity service to more neighborhoods in Seattle. The Link extensions would construct stations in ten new locations and reconstruct or expand upon existing facilities at several other station areas. These projects will include investments to the pedestrian and bicycle connections to the station areas.

The City's emphasis on prioritizing neighborhoods with historical underinvestment will continue to guide future decisions on where improvements are focused; the discussion of

equity considerations in the preceding section indicates neighborhoods where priority populations and improvement needs intersect. Among many other factors, the planning process for active transportation network improvements will also consider changes in land use patterns for continued prioritization and phasing of infrastructure projects. Those areas of focus may vary to some degree depending on which alternative is selected.

A GIS analysis was completed to quantify how each action alternative would perform in terms of concentrating growth in areas with the highest access to active transportation facilities. Population data under each alternative was compiled by high, medium, and low sidewalk connectivity census tracts, as was presented in **Exhibit 3.10-13**.

Exhibit 3.10-32 summarizes the percentage of Seattle's population within each category ~~under~~ for each alternative. This analysis shows that ~~under~~ for all future alternatives, including the No Action Alternative, the percentage of people living within high connectivity census tracts would increase compared to existing conditions. Alternative 1, No Action, and Alternative 2 would have the greatest concentration of population within high sidewalk connectivity areas. Alternatives 3 and 5 would also result in an increase, but not as high as for the other alternatives and the Preferred Alternative would fall between those bookends.

Exhibit 3.10-32. Population within Low, Medium, and High Sidewalk Connectivity Census Tracts

	Low (≤ 0.5)	Medium (>0.5; ≤ 0.75)	High (>0.75)
Existing	19.5%	17%	64%
Alternative 1, No Action	17%	16%	68%
Alternative 2	17%	16%	68%
Alternative 3	18%	16%	66%
Alternative 5	18%	16%	66%
Preferred Alternative	18%	15%	67%

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Source: Fehr & Peers, 2023~~3~~4.

Exhibit 3.10-33 summarizes the percentage of jobs in Seattle within each category of census tract ~~under~~ for each alternative. These results are much more consistent across alternatives as the concentrations of employment growth are not assumed to vary as much as housing growth. All future year alternatives would result in 75% of employment within high connectivity census tracts, 9% within medium connectivity census tracts, and 16% within low connectivity census tracts.

Exhibit 3.10-33. Employment within Low, Medium, and High Sidewalk Connectivity Census Tracts

	Low (≤ 0.5)	Medium (>0.5; ≤ 0.75)	High (>0.75)
Existing	16%	9%	76%
Alternative 1, No Action	16%	9%	75%
Alternative 2	16%	9%	75%
Alternative 3	16%	9%	75%
Alternative 5	16%	9%	75%
Preferred Alternative	16%	9%	75%

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Source: Fehr & Peers, 2023~~3~~4.

A summary of population and employment within a quarter mile of the All Ages and Abilities bicycle network is shown in **Exhibit 3.10-34**. The existing All Ages and Abilities network can be found in **Exhibit 3.10-16** with future year changes displayed in **Exhibit 3.10-31**.

All future year alternatives, including the No Action Alternative, show an increase in the percentage of population and employment within a quarter-mile of the All Ages and Abilities bike network as compared to existing conditions. Of the ~~four~~ modeled future year alternatives, Alternative 1 would have~~has~~ the greatest percentage of population and employment growth within a quarter-mile of the All Ages and Abilities bike network. Though Alternative 1, No Action, would have the highest percentage of employment within a quarter-mile of the All Ages and Abilities bike network, the other action alternatives would be very similar. The Preferred Alternative would have the lowest percentage of population within a quarter-mile of the All Ages and Abilities bike network~~; however, the share is just slightly above the three action alternatives~~.

Exhibit 3.10-34. Population and Employment within ¼ Mile of the All Ages and Abilities Bike Network

	Population	Employment
Existing	68%	84%
Alternative 1, No Action	76%	88%
Alternative 2	75%	87%
Alternative 3	75%	87%
Alternative 5	75%	87%
Preferred Alternative	73%	87%

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Source: Fehr & Peers, 2023~~3~~4.

The number of people walking and biking will continue to increase compared to existing conditions even under currently adopted policies. Therefore, under the No Action Alternative, there would be more demand for active transportation facilities throughout the city, including areas that lack sidewalks, curb ramps, pedestrian crossings, and dedicated bicycle facilities. Capacity constraints on pedestrian and bicycle facilities are rare and are typically only a concern at bottlenecks such as pathways across bridges or areas of extremely high pedestrian activity. However, there are many locations throughout the city that would benefit from improvements to make walking and biking safer and more comfortable.

The action alternatives considered in this EIS are not expected to preclude any planned pedestrian and bicycle improvements and would likely result in improved infrastructure as new development projects would be subject to city standards for frontage improvements. As shown by the GIS analysis, the relative shares of growth within areas of high pedestrian and bicycle infrastructure access have slight differences across the alternatives. Compared to the No Action Alternative, there are slightly higher percentages of population within low pedestrian connectivity areas under Alternative 3, ~~and~~ Alternative 5, and the Preferred Alternative. Additionally, all action alternatives have a slightly lower percentage of population and employment within ¼ mile of the All Ages and Abilities bike network compared to the No Action Alternative.

Because the action alternatives would result in higher levels of growth than the No Action Alternative, there would be more people walking and biking in areas with existing network gaps, affecting the comfort, convenience, and willingness of those vulnerable users to travel by active transportation modes and potentially making it more difficult to reach the City's mode share targets. However, from a regional perspective, accommodating more growth within Seattle may provide access to better active transportation amenities as more suburban locations may have less pedestrian and bicycle infrastructure than Seattle. Therefore, at this programmatic level of evaluation and considering both the local and regional effects of accommodating more growth in Seattle, the impact to pedestrian and bicycle travel is not considered to rise to a level of significance.

Freight Mobility & Access

Because this is a programmatic EIS for all of Seattle, it studies citywide land use and zoning changes, rather than a project-specific proposal. Whichever alternative is implemented would result in a wide range of individual projects implemented over a long timeframe and across the city. Because the specific locations and sizes of development are unknown, it is not possible to specify how freight may be impacted by changes to loading zones or access needs at particular locations. These are potentially significant impacts that would need to be analyzed and mitigated at the project level.

The relative differences in traffic congestion described in the Roadway Users sections under each alternative are relevant to freight mobility. While these results provide an indication of relative delays expected among the alternatives, these effects may be more challenging for

freight as traffic congestion is more difficult for large trucks to navigate and trucks typically travel at slower speeds than general purpose traffic.

The alternatives under consideration are not expected to materially affect rail operations. The railroads running through the city are privately ~~operated~~ owned and regularly adjust their operations to respond to changing needs.

Safety

Seattle's Vision Zero policy aims to eliminate traffic-related fatalities and serious injuries by 2030. This goal, and the policies and strategies supporting it, will be pursued regardless of which land use alternative is selected. Some strategies can be applied citywide, for example reducing speed limits and implementing leading pedestrian intervals (LPIs) that give people walking additional time to begin crossing the street before vehicles proceed. Other strategies are more location-specific depending on the context and could include traffic calming treatments, new traffic signals, separation of facilities for vulnerable users, and other physical changes to transportation facility design. As is current practice, SDOT will continue to monitor traffic safety and act to address areas of high need particularly for the most vulnerable users. As safety improvements continue to be implemented over the next two decades, it is expected that the safety program will result in safer conditions at many locations, potentially leading to decreased likelihood of traffic fatalities and serious injuries at those locations.

Relative to the No Action Alternative, the action alternatives would result in between 1% and 3.3~~1~~% more vehicle miles traveled due to higher levels of growth assumed. In terms of relative exposure among the action alternatives, Alternative 5 and the Preferred Alternative are ~~is~~ expected to be on the high end of that range while Alternatives 2 and 3 would be on the lower end. Alternative 4 would be within that range and likely closer to Alternatives 2 and 3 because of the similarity in total assumed growth. Increased VMT could potentially result in an increased number of collisions. Likewise, the increase in people walking and biking could increase exposure to the most vulnerable travelers. While the increasing number of travelers inherently increases the potential exposure to collisions, there is no evidence that the collision rate (i.e., the likelihood of a collision at a particular location) would increase. From a regional perspective, accommodating more growth within Seattle may provide safety benefits as more suburban locations may have less pedestrian and bicycle infrastructure than Seattle. Other factors may improve safety, for example the expected decrease in vehicle speeds may limit the severity of crashes and the action alternatives may result in more safety project implementation due to additional frontage improvements and a larger tax base.

Site-specific issues cannot be addressed at this level of analysis. However, regardless of the alternative selected, individual development applications would be reviewed through the City's permitting process, at which time the City may identify required safety features for the specific site. Due to the increase in people traveling by all modes relative to the No Action Alternative, a potential safety impact is identified under all action alternatives. However, at this programmatic level of evaluation and given the potentially counteracting factors influencing

safety among the alternatives, the impact of the action alternatives relative to the No Action Alternative is not considered to rise to a level of significance.

Ferry Service

All of the alternatives could result in additional development near Washington State Ferries (WSF) and King County ferry terminals which could result in minor adverse impacts to staging, load, drop-off, and other activities. These impacts would be minor due to existing facilities for staging of cars, opportunities for project specific mitigation, and limitations on development in shoreline environment. Impacts might be larger, but still minor, for those alternatives that focus growth near transit services such as Alternative 4 and 5 and the Preferred Alternative.

Equity & Climate Vulnerability Considerations

The City of Seattle has undertaken many recent efforts to understand and analyze race and social justice, as it relates to access to opportunities, equity, and climate vulnerability. The Seattle Racial and Social Equity Index combines data on race, ethnicity, and related demographics with data on socioeconomic and health disadvantages to identify neighborhoods with large proportions of priority populations.[89] In many cases, locations with large proportions of priority populations are correlated to locations that lack comfortable transportation facilities, including sidewalks and access to bicycle facilities. A similar pattern is shown in the City's Access to Opportunity Index which includes access to frequent bus service and light rail/streetcar among other criteria.

In many neighborhoods there is a strong connection between demographic variables identified in the Racial and Social Equity Index and sidewalk connectivity. The Racial and Social Equity Composite Index shows that South Seattle, including Columbia City, Beacon Hill, and Rainier Valley have the highest or second highest equity priority. A similar geographic pattern is reflected in the sidewalk connectivity map, which shows low or medium connectivity in these communities. Similarly, the Delridge neighborhood shows the highest equity priority and ranks as low to medium connectivity for network completion. On the opposite end of Seattle, North Seattle near Shoreline has the highest or second highest equity priority composites, while these areas are also identified as low sidewalk connectivity. Comparatively, neighborhoods in areas that have the lowest or second lowest composite scores, including Ballard, Fremont, Laurelhurst, Magnolia, Capitol Hill, and West Seattle, have high sidewalk connectivity. Providing additional housing growth in areas with more complete infrastructure could advance equity by expanding the opportunity for more people to live in those areas. From that perspective, all of the action alternatives could advance equity by providing more housing opportunities throughout the city with Alternative 5 and the Preferred Alternative providing the most opportunity through theirits higher housing targets.

[89] City of Seattle. "City of Seattle Racial and Social Equity Index Viewer." https://population-and-demographics-seattlecitygis.hub.arcgis.com/apps/SeattleCityGIS::racial-and-social-equity-index-viewer/explore

There are similar correlations when comparing the Racial and Social Equity Composite Index to access to the All Ages and Abilities bicycle network. However, due to recent investment by the City of Seattle, many areas with the highest equity priority are located within one-quarter mile of the All Ages and Abilities network, including South Seattle and Delridge. While access is provided to many neighborhoods, as previously noted, gaps in the network are often a barrier to bicycle connectivity.

An important consideration for climate vulnerability and health disparities is the distribution of effects from emissions, generated by personal and freight vehicles. Underserved communities often face the highest effects of vehicle emissions; for example, freight traffic emissions or poor air quality due to close proximity heavily congested roadways and freeways. Total VMT generated by each alternative was estimated using the SoundCast model. The action alternatives are expected to result in higher VMT than the No Action Alternative due to the increased growth levels. The increase for Alternatives 2 and 3 is expected to be approximately 1% higher than the No Action Alternative and for Alternative 5 and the Preferred Alternative are~~is~~ expected to be approximately 3% higher. Alternative 4 would fall within that range and likely most similar to Alternatives 2 and 3. Therefore, it is possible that the action alternatives—Alternative 5 and the Preferred Alternative in particular—could result in additional vehicle emissions near underserved communities along high vehicle emissions roadways. See **Section 3.1 Earth & Water Quality** and **Section 3.2 Air Quality & GHG Emissions** for a comprehensive evaluation of the potential effects of increased VMT on water and air quality.

From a regional perspective, accommodating more growth within dense urban areas like Seattle provides better climate outcomes than if that growth were accommodated elsewhere. People living in urban areas tend to generate lower VMT than those in suburban or rural locations. One key factor is the modal choices available; people living in cities tend to walk, bike, and take transit more often as those modes are more readily available and convenient within dense areas. In addition, trips that are made by car tend to be shorter because residents are generally in closer proximity to their destinations (e.g., school, shopping, or commute trips). Therefore, at a regional scale, concentrating more growth within Seattle is expected to lead to travel behaviors with lower impacts to climate vulnerability than if that growth occurred in outlying areas. Because all of the action alternatives would accommodate more growth than the No Action Alternative, they are expected to result in better climate outcomes with Alternative 5 and the Preferred Alternative providing the most benefit as theyit would accommodate the highest level of housing growth within Seattle.

Impacts of Alternative 1: No Action

This section summarizes the analysis results and potential impacts of Alternative 1, No Action. Alternative 1 serves as the baseline for identifying impacts of the action alternatives. It represents the operation of the transportation system if no zoning changes were made. However, growth would continue to occur under Alternative 1 consistent with current adopted zoning as described in **Chapter 2**.

Seattle Transportation Plan & Alternative 1, No Action

The Alternative 1, No Action, results described in this section are those produced for the Draft EIS, before the Seattle Transportation Plan was adopted. This version of the No Action Alternative is used as the baseline for identifying impacts of Alternatives 2, 3, 4, and 5.

The Impacts of Preferred Alternative section includes a revised evaluation of Alternative 1, No Action, that includes the network maps, policy direction, and candidate projects from the adopted STP. This updated Alternative 1, No Action, is used as the baseline for impacts evaluation of the Preferred Alternative.

Mode Share

The mode share expected to occur under Alternative 1 is summarized by subarea in **Exhibit 3.10-35**. The model predicts that SOV mode shares will decrease by 2044, with changes ranging from approximately five to thirteen percent depending on the subarea. The largest decreases are expected in the Downtown/Lake Union and Capitol Hill/Central District subareas. Most subareas are expected to meet their SOV mode share targets under the 2044 Alternative 1 scenario. The exception is Duwamish where shifts to non-SOV modes are more difficult to achieve given the travel needs of the manufacturing and industrial land uses in that area. Therefore, a mode share impact is expected in one subarea under Alternative 1.

Exhibit 3.10-35. PM Peak Hour SOV Mode Share—Alternative 1, No Action

Subarea	SOV Target	Existing SOV Share	Alternative 1, No Action, SOV Share
(1) Northwest Seattle	37%	42%	34%
(2) Northeast Seattle	35%	35%	26%
(3) Queen Anne/Magnolia	38%	42%	34%
(4) Downtown/Lake Union	18%	24%	11%
(5) Capitol Hill/Central District	28%	37%	27%
(6) West Seattle	35%	41%	35%
(7) Duwamish	51%	72%	67%
(8) Southeast Seattle	38%	36%	31%

Note: Existing (2017-2019) mode share data from the PSRC household travel survey have substantial margins of error. See **Exhibit 3.10-10** for margins of error by subarea.
Source: Fehr & Peers, 2023.

Exhibit 3.10-36 compares the number of person trips expected by mode over the course of a day under existing conditions and 2044 Alternative 1. At the citywide level, the number of person trips is expected to increase by approximately 42% by 2044. However, the increase in trips by mode varies substantially. Growth in transit trips is expected to be highest among all modes with daily trips more than doubling; this would bring the transit mode share from the current 11% to 19% in 2044. While trips made by SOV and HOV would increase, the rate of growth would be much lower at 10% and 23%, respectively, decreasing the overall mode shares by 2044. In other words, while a substantial new number of trips are expected as population and employment increases in Seattle, travel behavior is expected to shift such that people choose to ride transit, walk, or bike in larger shares than currently occurs.

Exhibit 3.10-36. Daily Person Trips by Mode—Alternative 1, No Action

	Existing		Alternative 1, No Action	
Mode	Person Trips	Mode Share	Person Trips	Mode Share
SOV	1,624,000	40%	1,783,000	31%
HOV	1,169,000	28%	1,440,000	25%
Transit	465,000	11%	1,138,000	19%
Walk	776,000	19%	1,378,000	24%
Bike	71,000	2%	99,000	2%
Total	**4,105,000**	**100%**	**5,838,000**	**100%**

Source: Fehr & Peers, 2023.

The shift in mode shares predicted by the SoundCast model reflects trends observed over the decade preceding the pandemic. According to SDOT's 2021 Traffic Report, average daily traffic volumes remained essentially flat over the 2009-2019 period despite a 24% increase in the City's population and a 23% increase in regional employment.[90] During that time, average regional transit ridership grew at roughly the same rate as population and employment. The limited vehicle traffic growth projected by 2044 also reflects the constraints of the roadway system as many roadways already operate with considerable congestion during peak periods.

Transit

Passenger loads on key transit connections were forecasted for the PM peak hour. **Exhibit 3.10-37** summarizes the projected load factors on the busiest segment of each route in the peak direction of travel. Therefore, the conditions indicated here are conservatively high as all other segments on each route would operate with lower passenger volumes.

[90] Seattle Department of Transportation. 2022. "2021 Traffic Report." https://www.seattle.gov/documents/Departments/SDOT/About/DocumentLibrary/Reports/2021_Traffic_Report_ADA_21522.pdf

The table includes the Link light rail lines that will run through Seattle by 2044 as well as planned RapidRide routes. These include routes serving the same corridors as Routes 40 and 62 which were both found to reach the crowding threshold under existing conditions. Route 40 is now represented as RapidRide Fremont and Route 62 is now represented as RapidRide 65th.

Based on the transit ridership levels projected by the SoundCast model, eight of the sixteen studied routes (shown in bold in **Exhibit 3.10-37**) would exceed the crowding threshold on their busiest segments in the peak direction during the peak hour, constituting an impact under Alternative 1.

Exhibit 3.10-37. PM Peak Hour Maximum Passenger Load Factors—Alternative 1, No Action

Transit Route	Maximum Passenger Load Factor in Peak Direction
Link light rail—1 Line	**1.08**
Link light rail—2 Line	**1.29**
Link light rail—3 Line	**1.29**
RapidRide C Line—Westwood Village to Alaska Junction	0.71
RapidRide E Line—Downtown to Aurora Village	**1.89**
RapidRide G Line—Downtown to Madison Valley	0.35
RapidRide H Line—Alki to Burien	0.77
RapidRide J Line—Downtown to University District	**1.97**
RapidRide R Line—Downtown to Rainier Valley	**1.07**
RapidRide 23rd	0.47
RapidRide 65th (replaces Route 62)	0.82
RapidRide Beacon	0.50
RapidRide Denny	**2.83**
RapidRide Fremont (replaces Route 40)	**1.49**
RapidRide Green Lake	0.47
RapidRide Market	0.76

Source: Fehr & Peers, 2023.

Roadway Users

Under Alternative 1, growth would continue to occur resulting in increased vehicle volumes—both passenger vehicles and trucks. However, traffic volume growth rates during the PM peak hour are expected to be low. This is consistent with traffic growth patterns over the decade preceding the pandemic, as described earlier in this section. As growth throughout the city continues, the transportation system will likely experience "peak spreading." Peak spreading refers to travelers shifting the times they travel to avoid the heaviest traffic congestion. The

result is that while the peak hour may retain similar characteristics, the length of the congested period may grow.

VMT / VHT / Average Trip Speed

Exhibit 3.10-38 summarizes several citywide metrics for Alternative 1 relative to the existing condition. Total daily VMT generated by Seattle is expected to increase 10% between current conditions and 2044. However, the increase in the number of residents and workers assumed within the city would be higher at 38%; therefore, the VMT per capita would decrease from approximately 17.2 miles per day to 13.7 miles per day, a 20% decrease. This decrease is reflecting a change in travel behavior in terms of mode choice as well as average trip lengths decreasing as people do not have to travel as far, for instance between their home and work locations.

Seattle Transportation Plan VMT Target

The Seattle Transportation Plan targets a 37% reduction in VMT by 2044 (relative to a 2018 baseline). However, the PSRC regional travel demand model used for this EIS suggests increases in total VMT for all future year scenarios. To move toward a decreasing VMT trend, the City of Seattle would need to pursue additional strategies related to equitable demand management through vehicle pricing; parking supply and pricing; investments to maximize the comfort, convenience, and reliability of walking, rolling, and riding transit; and land use coordination to increase transit-oriented development. Additional information may be found in Section 3.10.3 Mitigation Measures.

Similarly, VHT is projected to increase in total compared to existing conditions but would slightly decrease on a per capita basis. By 2044, the average resident/worker is expected to spend approximately half an hour traveling by private car or truck; this metric does not include bus travel. The ratio of VMT to VHT represents the average speed of trips made by Seattle residents and workers, including on the highway system and local streets. That metric is projected to decrease from 30mph under existing conditions to 28mph in 2044, reflecting higher levels of congestion.

Exhibit 3.10-38. Daily VMT, VHT, and Average Trip Speed—Alternative 1, No Action

	Existing		Alternative 1, No Action	
Metric	Total	Per Capita	Total	Per Capita
VMT	22,203,300	17.2	24,357,100	13.7
VHT	741,900	0.6	865,800	0.5
Average Trip Speed	29.9	—	28.1	—

Source: Fehr & Peers, 2023.

Because the VMT per capita would not exceed the existing levels, no impact to VMT per capita is identified under Alternative 1.

Travel Time

Exhibit 3.10-39 summarizes existing PM peak hour corridor travel times as well as those forecasted to occur under 2044 Alternative 1.[91] **Exhibit 3.10-40** shows the LOS values along associated corridors on the map. Corridor travel times are expected to increase by up to 2.5 minutes compared to existing conditions. The largest increases are expected on Boren Avenue, 23rd Avenue, and Martin Luther King, Jr Way South. Under existing conditions, 81 study corridors (with each direction counted separately) would operate at LOS A-C, 15 would operate at LOS D, 4 would operate at LOS E, and 4 would operate at LOS F. By 2044, LOS levels would shift to have 77 corridors operating at LOS A-C, 15 at LOS D, 8 operating at LOS E, and 4 operating at LOS F. Therefore, travel time impacts are expected under Alternative 1on four corridors (shown in bold in **Exhibit 3.10-39**):

- Mercer Street between Elliott Avenue W and Fairview Avenue N
- Stewart Street between 1st Avenue and Denny Way
- Olive Way between 4th Avenue and Denny Way
- S Michigan Street between E Marginal Way S and Airport Way S

[91] For corridors with peak directional patterns, the AM peak hour would typically reflect similar conditions in the opposite direction from those shown for the PM peak hour.

Exhibit 3.10-39. PM Peak Hour Travel Time Corridor Level of Service—Alternative 1, No Action

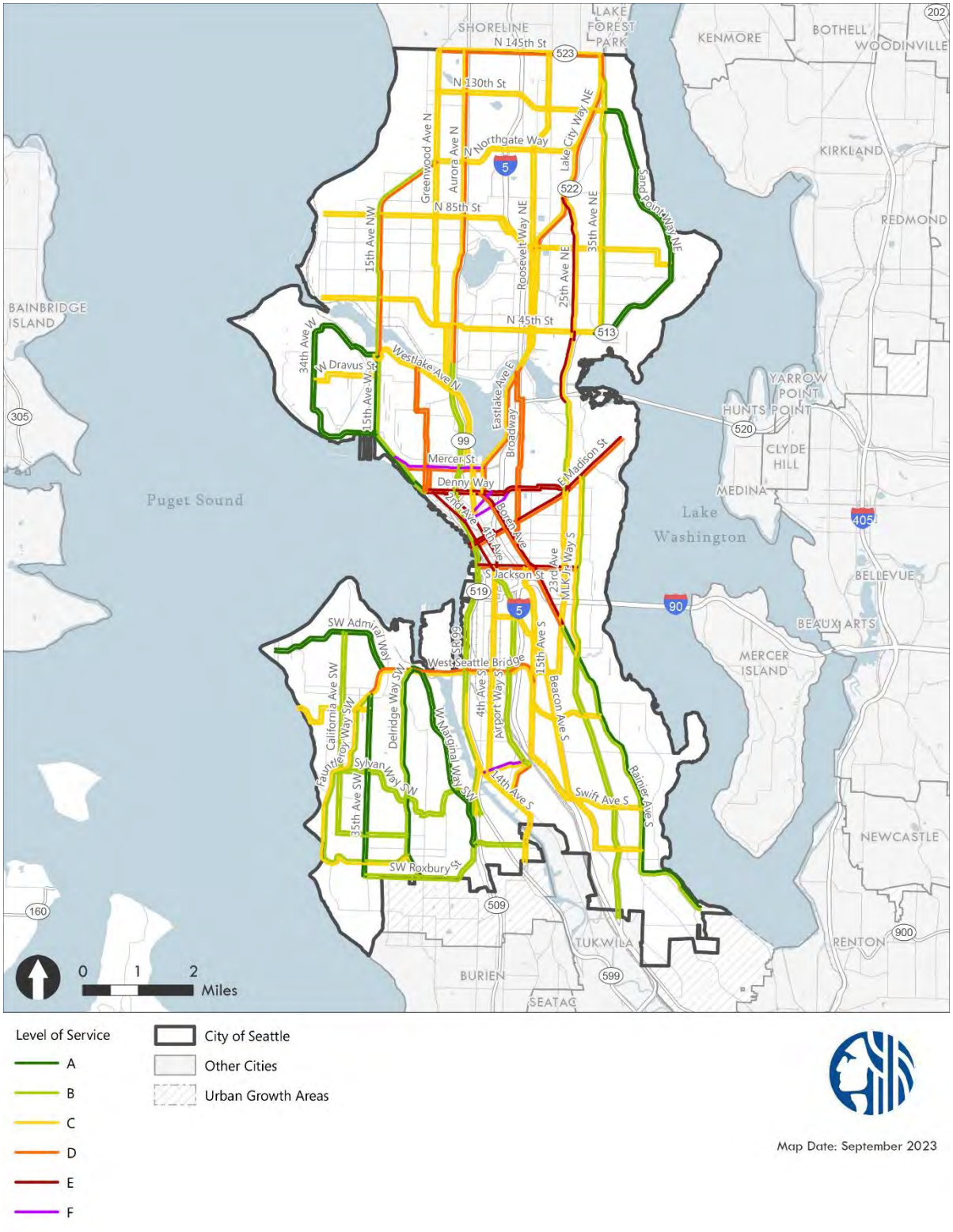
		Existing Conditions Minutes / Level of Service		Alternative 1, No Action, Minutes / Level of Service	
Roadway	Extents	N/E	S/W	N/E	S/W
N 145th St	Greenwood Ave N to Lake City Way NE	10 / D	9.5 / C	10.5 / D	9.5 / C
N 130th St	Greenwood Ave N to 35th Ave NE	11.5 / C	12 / C	11.5 / C	12 / C
N Northgate Way	Greenwood Ave N to Lake City Way NE	10.5 / C	10.5 / C	10.5 / C	11 / C
N 85th St	32nd Ave NW to Sand Point Way NE	24.5 / C	24.5 / C	25 / C	24.5 / C
N 45th St	32nd Ave NW to Union Bay Pl NE	23.5 / C	23.5 / C	24.5 / C	23.5 / C
15th Ave NW	W Emerson St to N 105th St	16 / D	10.5 / B	17 / D	11.5 / B
Greenwood Ave N	Nickerson St to N 145th St	26 / C	24 / C	27 / C	25 / C
Aurora Ave N	N 38th St to N 145th St	18.5 / C	15 / C	19 / D	16.5 / C
Roosevelt Way NE	Fuhrman Ave E to N 145th St	22 / C	20.5 / B	23 / C	21.5 / C
Lake City Way NE	NE 75th St to N 145th St	13.5 / D	10 / C	14 / D	11 / C
25th Ave NE	E Roanoke St to Lake City Way NE	14 / C	21 / D	15 / C	22.5 / E
35th Ave NE	Union Bay Pl NE to Lake City Way NE	16.5 / B	17 / B	16.5 / B	17.5 / C
Sand Point Way NE	Union Bay Pl NE to 35th Ave NE	12.5 / A	12 / A	12.5 / A	12 / A
34th Ave W	15th Ave W to15th Ave W	11.5 / A	12 / A	11.5 / A	12 / A
W Dravus St	34th Ave W to15th Ave W	5 / C	4.5 / C	5 / C	4.5 / C
15th Ave W	Queen Anne Ave N to W Emerson St	9 / B	7.5 / A	8.5 / B	8 / A
Queen Anne Ave N	Denny Way to Nickerson St	12.5 / D	11.5 / C	12.5 / D	12 / D
SR 99	S Nevada St to N 38th St	13.5 / C	15 / C	11.5 / B	12.5 / B
Westlake Ave N	Stewart St to W Emerson St	16 / C	17 / C	16 / C	18 / C
Eastlake Ave E	Denny Way to Fuhrman Ave E	11.5 / C	10.5 / C	12 / D	11.5 / C
Broadway	Boren Ave to Eastlake Ave E	17.5 / D	17 / D	18 / D	18.5 / D

Roadway	Extents	Existing Conditions Minutes / Level of Service		Alternative 1, No Action, Minutes / Level of Service	
		N/E	S/W	N/E	S/W
23rd Ave	E Madison St to E Roanoke St	6.5 / C	5 / B	6 / C	5 / B
Mercer St	**Elliott Ave W to Fairview Ave N**	7.5 / C	14 / F	8 / D	**14 / F**
Denny Way	Queen Anne Ave N to E Madison St	17 / E	16 / D	17.5 / E	16.5 / E
2nd Ave	4th Ave S to Denny Way	- / -	11.5 / E	- / -	12 / E
4th Ave	S Jackson St to Denny Way	9 / D	- / -	10 / E	- / -
Stewart St	**1st Ave to Denny Way**	- / -	6 / F	- / -	**6.5 / F**
Olive Way	**4th Ave to Denny Way**	7 / F	- / -	**7 / F**	- / -
E Madison St	Alaskan Way S to McGilvra Blvd E	20 / D	20 / E	20 / D	20 / E
Boren Ave	23rd Ave S to Denny Way	16 / D	14.5 / D	18 / E	15.5 / D
S Jackson St	Alaskan Way S to MLK Jr. Way S	8.5 / D	10.5 / E	8.5 / D	11 / E
23rd Ave	15th Ave S to E Madison St	14 / C	15.5 / C	16.5 / C	17.5 / C
MLK Jr. Way S	Rainier Ave S to E Madison St	10 / B	11 / B	11.5 / B	12 / C
4th Ave S	E Marginal Way S to S Jackson St	12 / C	11.5 / C	13.5 / C	11.5 / C
Airport Way S	S Albro Pl to 4th Ave S	10 / B	10 / B	10.5 / B	10 / B
15th Ave S	S Jackson St to Rainier Ave S	14.5 / C	16 / C	15 / C	16.5 / C
E Marginal Way S	S Holden St to S Nevada St	4.5 / C	4.5 / B	5.5 / C	5 / B
Swift Ave S	Rainier Ave S to S Columbian Way	13 / C	13 / C	14 / C	14 / C
Beacon Ave S	Rainier Ave S to 4th Ave S	21.5 / C	24 / C	22 / C	24.5 / C
MLK Jr. Way S	S Boeing Access Rd to Rainier Ave S	14.5 / A	15.5 / B	16.5 / B	16.5 / B
Rainier Ave S	Cornell Ave S to 23rd Ave S	17.5 / A	20 / B	18.5 / A	20.5 / B
S Michigan St	**E Marginal Way S to Airport Way S**	3.5 / C	4.5 / F	3.5 / C	**4.5 / F**
Ellis Ave S	E Marginal Way S to Airport Way S	3 / D	3.5 / C	3 / D	3.5 / C

Roadway	Extents	Existing Conditions Minutes / Level of Service		Alternative 1, No Action, Minutes / Level of Service	
		N/E	S/W	N/E	S/W
14th Ave S	S Director St to 1st Ave S	7 / C	7 / C	7.5 / C	7 / C
California Ave SW/SW Thistle St	Delridge Way SW to SW Admiral Way	17 / B	17 / B	17 / B	17.5 / B
Fauntleroy Way SW/SW Barton St	Delridge Way SW to 35th Ave SW	15 / B	17 / B	15.5 / B	18 / C
35th Ave SW	SW Roxbury St to Fauntleroy Way SW	8.5 / A	9 / A	8.5 / A	9 / A
Delridge Way SW	SW Roxbury St to W Marginal Way SW	11 / A	13 / B	11.5 / A	13.5 / B
W Marginal Way SW	S Cloverdale St to Delridge Way SW	7.5 / A	8 / A	7.5 / A	8.5 / A
SW Admiral Way	63rd Ave SW to SW Manning St	6.5 / A	7 / A	6.5 / A	7 / A
West Seattle Bridge	35th Ave SW to 15th Ave S	7.5 / C	10 / D	8.5 / C	10 / D
SW Alaska St	Beach Dr SW to 35th Ave SW	7 / C	7.5 / C	7 / C	7.5 / C
Sylvan Way SW	California Ave SW to S Holden St	12 / B	10.5 / A	12 / B	11 / B
SW Roxbury St	35th Ave SW to 14th Ave S	11 / B	10 / B	11.5 / B	10.5 / B

Source: Fehr & Peers, 2023.

Exhibit 3.10-40. Alternative 1, No Action, Travel Time Corridor LOS



Source: Fehr & Peers, 2023.

Screenlines

Exhibit 3.10-41 summarizes PM peak hour screenline V/C ratios for existing conditions and 2044 Alternative 1. On average, the future volume forecasts are approximately ~~ten~~ twelve percent higher than the existing volumes across all locations. Under Alternative 1, there are six screenlines with V/C ratios higher than 0.90 (indicating volumes are approaching capacity) including several at or just over capacity, compared with three in the existing conditions. The screenlines are:

- Ship Canal—Ballard Bridge
- Ship Canal—Fremont Bridge
- Ship Canal—Aurora Avenue N
- Duwamish River—1st Avenue S and 16th Avenue S
- Ship Canal—University and Montlake Bridges
- East of 9th Street

However, no screenlines exceed the established thresholds and therefore no impacts to screenlines are expected under Alternative 1.

Exhibit 3.10-41. PM Peak Hour Screenline Volume-to-Capacity Ratio—Alternative 1, No Action

Screenline	Location	Extents	V/C Threshold	Existing Conditions		Alternative 1, No Action	
				N/E	S/W	N/E	S/W
1.11	North City Limit	3rd Ave NW to Aurora Ave N	1.20	0.68	0.52	0.75	0.65
1.12	North City Limit	Meridian Ave N to 15th Ave NE	1.20	0.47	0.30	0.48	0.39
1.13	North City Limit	30th Ave NE to Lake City Way NE	1.20	0.84	0.47	0.85	0.62
2.00	Magnolia	Magnolia Bridge to W Emerson Place	1.00	0.56	0.61	0.58	0.61
3.11	Duwamish River	West Seattle Bridge & Spokane St	1.20	0.64	0.81	0.72	0.81
3.12	Duwamish River	1st Ave S & 16th Ave S	1.20	0.56	0.87	0.69	0.91
4.11	South City Limit	Martin Luther King Jr. Way to Rainier Avenue S	1.00	0.57	0.75	0.83	0.87
4.12	South City Limit	Marine Dr SW to Meyers Way S	1.00	0.37	0.42	0.44	0.49
4.13	South City Limit	SR 99 to Airport Way S	1.00	0.44	0.45	0.63	0.47
5.11	Ship Canal	Ballard Bridge	1.20	1.01	0.71	1.01	0.90
5.12	Ship Canal	Fremont Bridge	1.20	1.00	0.79	1.00	1.03
5.13	Ship Canal	Aurora Ave Bridge	1.20	0.96	0.58	0.96	0.70
5.16	Ship Canal	University & Montlake Bridges	1.20	0.74	0.79	0.74	0.94
6.11	South of NW 80th St	Seaview Ave NW to 15th Ave NW	1.00	0.37	0.46	0.40	0.52
6.12	South of N W 80th St	8th Ave NW to Greenwood Ave N	1.00	0.57	0.49	0.60	0.62
6.13	South of NE 80th St	Linden Ave N to 1st Ave NE	1.00	0.54	0.49	0.51	0.59
6.14	South of NE 80th St	5th Ave NE to 15th Ave NE	1.00	0.71	0.56	0.65	0.69
6.15	South of NE 80th St	20th Ave NE to Sand Point Way NE	1.00	0.47	0.34	0.41	0.39
7.11	West of Aurora Ave	Fremont Pl N to N 65th St	1.00	0.53	0.65	0.64	0.63
7.12	West of Aurora Ave	N 80th St to N 145th St	1.00	0.41	0.41	0.44	0.45
8.00	South of Lake Union	Valley St to Denny Way	1.20	0.49	0.35	0.50	0.35
9.11	South of Spokane St	Beach Dr SW to W Marginal Way SW	1.00	0.45	0.71	0.51	0.82

Screenline	Location	Extents	V/C Threshold	Existing Conditions		Alternative 1, No Action	
				N/E	S/W	N/E	S/W
9.12	South of Spokane St	E Marginal Way S to Airport Way S	1.00	0.51	0.54	0.65	0.52
9.13	South of Spokane St	15th Ave S to Rainier Ave S	1.00	0.56	0.57	0.69	0.60
10.11	South of S Jackson St	Alaskan Way S to 4th Ave S	1.00	0.61	0.64	0.81	0.82
10.12	South of S Jackson St	12th Ave S to Lakeside Ave S	1.00	0.52	0.64	0.74	0.74
12.12	East of CBD	S Jackson St to Howell St	1.20	0.36	0.36	0.37	0.44
13.11	East of I-5	NE Northgate Way to NE 145th St	1.00	0.67	0.51	0.70	0.53
13.12	East of I-5	NE 65th St to NE 80th St	1.00	0.52	0.54	0.54	0.50
13.3	East of I-5	NE Pacific St to NE Ravenna Blvd	1.00	0.59	0.52	0.61	0.56
A1	North of Seneca St	1st Ave to 6th Ave	N/A	0.47	0.50	0.63	0.65
A2	North of Blanchard	Elliott Ave to Westlake Ave	N/A	0.43	0.31	0.45	0.37
A3	East of 9th Ave	Lenora St to Pike St	N/A	0.46	0.83	0.46	0.94
A4	South of Mercer St	Elliott Ave W to Aurora Ave N	N/A	0.53	0.46	0.55	0.59
A5	East of 5th Ave N	Denny Way to Valley St	N/A	0.40	0.40	0.41	0.37
A6	North of Pine St	Melrose Ave E to 15th Ave E	N/A	0.39	0.32	0.41	0.42
A7	North of James St– E Cherry St	Boren Ave to 14th Ave	N/A	0.46	0.32	0.56	0.39
A8	West of Broadway	Yesler Way to E Roy St	N/A	0.47	0.38	0.55	0.46
A9	South of NE 45th St	7th Ave NE to Montlake Blvd NE	N/A	0.56	0.53	0.54	0.60
A10	East of 15th Ave NE	NE 45th St to NE 52nd St	N/A	0.51	0.48	0.58	0.53
A11	South of Northgate Way (N/NE 110th St)	N Northgate Way to Roosevelt Way NE	N/A	0.44	0.46	0.46	0.54
A12	East of 1st Ave NE	NE 100th St to NE Northgate Way	N/A	0.43	0.48	0.44	0.51

Source: Fehr & Peers, 2023.

Intersection LOS—NE 130th / NE 145th Street Subarea

Exhibit 3.10-42 summarizes the LOS and vehicle delay for each study intersection for Alternative 1. The subarea is expected to experience increased congestion in 2044 compared to current conditions. This can be attributed to the expected growth in population and employment locally and throughout the region. Separate from the model forecasts, the trips from a related project along Aurora Avenue N were added to the intersection forecasts because the growth from the traffic model did not account for all of the anticipated growth from this proposed project. A 145,000 square foot discount warehouse was assumed to generate 610 PM peak hour trips. These were distributed throughout the study area based on a trip distribution pattern from the model for this area. The City of Shoreline also has plans to improve N 145th Street (the city limit between Seattle and Shoreline), which include installing roundabouts at the two ramp intersections with I-5. The analysis is consistent with all planned design changes along N 145th Street.

Under Alternative 1, six intersections are expected to no longer meet the LOS D threshold, constituting a significant impact. These include:

- N 145th Street / Aurora Avenue N
- NE 145th Street / 5th Avenue NE
- NE 145th Street / 15th Avenue NE
- N 130th Street / Aurora Avenue N
- N 130th Street / 1st Avenue NE
- NE 125th Street / 15th Avenue NE

Exhibit 3.10-42. 130th/145th Street Subarea PM Peak Hour Level of Service—Alternative 1, No Action

ID	Intersection	Existing Conditions—Level of Service / Delay (seconds)	Alternative 1, No Action—Level of Service / Delay (seconds)
1	NE 155th St / 5th Ave NE	B / 11	B / 19
2	**N 145th St / Aurora Ave N**	D / 47	**E / 68**
3	N 145th St / Meridian Ave N	E / 58	B / 18
4	N 145th St / 1st Ave NE	C / 21	B / 20
5	NE 145th St / I-5 On & Off Ramps	D / 35	A / 9
6	**NE 145th St / 5th Ave NE**	D / 42	**E / 69**
7	**NE 145th St / 15th Ave NE**	D / 48	**E / 66**
8	N 137th St / Meridian Ave N / Roosevelt Way N	A / 7	A / 7
9	**N 130th St / Aurora Ave N**	D / 51	**E / 79**
10	N 130th St / Meridian Ave N	A / 9	B / 13
11	**N 130th St / 1st Ave NE**	D / 52	**E / 71**
12	NE 130th St / I-5 On Ramp	A / 2	A / 2

ID	Intersection	Existing Conditions—Level of Service / Delay (seconds)	Alternative 1, No Action—Level of Service / Delay (seconds)
13	NE 130th St / Roosevelt Way NE / 5th Ave NE	C / 32	D / 38
14	Roosevelt Way NE / NE 125th St / 10th Ave NE	B / 17	B / 17
15	**NE 125th St / 15th Ave NE**	D / 41	**E / 60**

Note: Intersections that exceed the LOS threshold are shown in bold.
Source: Fehr & Peers, 2023.

State Facilities

Exhibit 3.10-43 includes volume to maximum service volume ratios for state facilities under existing conditions as well as Alternative 1. Nearly all state facilities are expected to have increased volumes by 2044. Under Alternative 1, volumes at seven state facility study locations are expected to exceed the levels required to maintain the WSDOT LOS standard, constituting an impact under Alternative 1. These include:

- I-5 north of NE Northgate Way
- I-5 at the Ship Canal Bridge
- I-5 north of the West Seattle Bridge
- SR 99 north of N Northgate Way
- SR 99 at the Aurora Avenue Bridge
- SR 509 at the 1st Avenue S Bridge
- SR 522 south of NE 145th Street

I-5 north of Boeing Access Rd Ramp and the I-90 Mt Baker Tunnel are both expected to approach the LOS D service volumes, but not surpass the threshold. I-5 at the Ship Canal Bridge and north of the West Seattle Bridge, SR 99 at the Aurora Bridge, and SR 509 at the 1st Avenue Bridge are forecasted to have demand more than 20% over the LOS standard, indicating substantial vehicle congestion for some hours of the day. Because multiple state facilities within the city are expected to exceed WSDOT's LOS D standard, a significant impact to state facilities is expected under Alternative 1.

Exhibit 3.10-43. ~~PM Peak Hour~~Daily State Facilities Level of Service—Alternative 1, No Action

Facility	Extents	WSDOT LOS Standard	Existing Conditions—Volume to Maximum Service Volume Ratio	Alternative 1, No Action—Volume to Maximum Service Volume Ratio
I-5	**North of NE Northgate Way**	D	0.96	**1.03**
I-5	**Ship Canal Bridge**	D	1.21	**≥1.~~3~~20**
I-5	**North of West Seattle Bridge**	D	1.24	**≥1.~~3~~20**

Facility	Extents	WSDOT LOS Standard	Existing Conditions—Volume to Maximum Service Volume Ratio	Alternative 1, No Action—Volume to Maximum Service Volume Ratio
I-5	North of Boeing Access Rd Ramp	D	0.93	0.98
I-90	Mt Baker Tunnel	D	0.90	0.97
SR 99	**North of N Northgate Way**	D	0.96	**1.08**
SR 99	**Aurora Ave Bridge**	D	1.19	**≥1.320**
SR 99	Tunnel	D	0.58	0.65
SR 99	North of West Seattle Bridge	D	0.72	0.76
SR 99	South of S Cloverdale St	E (mitigated)	0.42	0.41
SR 509	**1st Ave S Bridge**	D	0.97	**≥1.250**
SR 519	S Atlantic St West of I-90 Ramps	D	0.90	0.83
SR 520	Lake Washington Bridge	D	0.60	0.86
SR 522	**South of NE 145th St**	D	1.01	**1.15**

Note: Facilities that exceed the LOS threshold are shown in bold.
A ratio of >1.2 indicates a demand of more than 20% over the maximum service volume, indicating substantial vehicle congestion for some hours of the day. The WSDOT standard is equivalent to a 1.0 (the denominator is the maximum volume at which LOS D can be maintained).
Source: Fehr & Peers, 2023.

Impacts of Alternative 2: Focused

Mode Share

Exhibit 3.10-44 summarizes the SOV mode share expected under Alternative 2. The SoundCast model predicts that Alternative 2 SOV mode shares will be essentially the same as Alternative 1 across all eight subareas. Seven of the subareas would still meet their SOV target and although the Duwamish subarea would exceed its target, the difference in mode share relative to Alternative 1 is expected to be less than the 1% impact threshold. Therefore, no mode share impact is expected under Alternative 2.

Exhibit 3.10-44. PM Peak Hour SOV Mode Share—Alternative 2

Subarea	SOV Target	Alternative 1, No Action, SOV Share	Alternative 2 SOV Share
(1) Northwest Seattle	37%	34%	34%
(2) Northeast Seattle	35%	26%	26%
(3) Queen Anne/Magnolia	38%	34%	34%
(4) Downtown/Lake Union	18%	11%	11%

Subarea	SOV Target	Alternative 1, No Action, SOV Share	Alternative 2 SOV Share
(5) Capitol Hill/Central District	28%	27%	27%
(6) West Seattle	35%	35%	35%
(7) Duwamish	51%	67%	67%
(8) Southeast Seattle	38%	31%	31%

Note: Existing (2017-2019) mode share data from the PSRC household travel survey have substantial margins of error. See **Exhibit 3.10-10** for margins of error by subarea.
Source: Fehr & Peers, 2023.

Exhibit 3.10-45 compares the number of daily person trips expected by mode under 2044 Alternative 1 and Alternative 2. Citywide, Alternative 2 is expected to result in approximately 156,000 additional person trips compared to Alternative 1, an increase of 43%. That increase is spread fairly evenly across modes. In other words, while Alternative 2 would result in slightly more trips, the underlying travel behavior and mode shares expected by 2044 is consistent between the alternatives.

Exhibit 3.10-45. Daily Person Trips by Mode—Alternative 2

Mode	Alternative 1, No Action	Alternative 2
SOV	1,783,000	1,847,000
HOV	1,440,000	1,471,000
Transit	1,138,000	1,160,000
Walk	1,378,000	1,414,000
Bike	99,000	102,000
Total	**5,838,000**	**5,994,000**

Source: Fehr & Peers, 2023.

Transit

Passenger loads on key transit connections were forecasted for the PM peak hour. **Exhibit 3.10-46** summarizes the projected load factors on the busiest segment of each route in the peak direction of travel. Passenger loads are expected to increase on most, but not all, routes. Study routes that would have a transit capacity impact under Alternative 2 are shown in bold in **Exhibit 3.10-46**. The impacted routes include:

- RapidRide E Line—Downtown to Aurora Village
- RapidRide J Line—Downtown to University District
- RapidRide R Line—Downtown to Rainier Valley
- RapidRide Fremont

Exhibit 3.10-46. PM Peak Hour Average Passenger Load Factors—Alternative 2

Transit Route	Maximum Passenger Load Factor in Peak Direction	
	Alternative 1, No Action	Alternative 2
Link light rail—1 Line	1.08	1.04
Link light rail—2 Line	1.29	1.31
Link light rail—3 Line	1.29	1.21
RapidRide C Line—Westwood Village to Alaska Junction	0.71	0.78
RapidRide E Line—Downtown to Aurora Village	1.89	**2.22**
RapidRide G Line—Downtown to Madison Valley	0.35	0.40
RapidRide H Line—Alki to Burien	0.77	0.93
RapidRide J Line—Downtown to University District	1.97	**2.64**
RapidRide R Line—Downtown to Rainier Valley	1.07	**1.27**
RapidRide 23rd	0.47	0.50
RapidRide 65th (replaces Route 62)	0.82	0.93
RapidRide Beacon	0.50	0.53
RapidRide Denny	2.83	2.58
RapidRide Fremont (replaces Route 40)	1.49	**1.65**
RapidRide Green Lake	0.47	0.42
RapidRide Market	0.76	0.85

Note: Impacted routes are shown in bold.
Source: Fehr & Peers, 2023.

Roadway Users

This section summarizes roadway conditions expected under Alternative 2.

VMT / VHT / Average Trip Speed

Exhibit 3.10-47 summarizes VMT, VHT, and average trip speed for Alternative 2 relative to Alternative 1. Total daily VMT generated under Alternative 2 is expected to increase by 1.4% compared to Alternative 1. However, the VMT per capita would decrease slightly from approximately 13.7 miles per day to 13.5 miles per day. This incremental difference may reflect slight changes in travel behavior in terms of mode choice and average trip lengths.

Similarly, VHT is projected to increase in total compared to Alternative 1 but would remain flat on a per capita basis at approximately a half hour of daily travel by private car or truck. The average trip speed would also decrease very slightly representing a small increase to levels of congestion on the highway system and local street network.

Exhibit 3.10-47. Daily VMT, VHT, and Average Trip Speed—Alternative 2

	Alternative 1, No Action		Alternative 2	
Metric	Total	Per Capita	Total	Per Capita
VMT	24,357,100	13.7	24,698,900	13.5
VHT	865,800	0.5	882,300	0.5
Average Trip Speed	28.1	—	28.0	—

Source: Fehr & Peers, 2023.

Because the VMT per capita under Alternative 2 would not exceed the level under Alternative 1, no impact to VMT per capita is identified under Alternative 2.

Travel Time

Exhibit 3.10-48 summarizes PM peak hour corridor travel times under Alternative 2 compared to Alternative 1.[92] **Exhibit 3.10-49** displays the LOS values along associated corridors on the map. All corridor travel times are expected to be within 0.5 minutes of Alternative 1 with some corridors seeing slight increases while others seeing slight decreases. Under Alternative 1, 77 corridors (with each direction counted separately) are expected to operate at LOS A-C, 15 at LOS D, 8 operating at LOS E, and 4 operating at LOS F. Under Alternative 2, 76 corridors are expected to operate at LOS A-C, 16 at LOS D, 8 operating at LOS E, and 4 operating at LOS F.

Alternative 1 and Alternative 2 are expected to result in the same four corridors operating at LOS F, one of which would have an increase in excess of the 5% threshold of significance. Therefore, a travel time impact is expected under Alternative 2 on one corridor (shown in bold in **Exhibit 3.10-48**):

- Olive Way between 4th Avenue and Denny Way

[92] For corridors with peak directional patterns, the AM peak hour would typically reflect similar conditions in the opposite direction from those shown for the PM peak hour.

Exhibit 3.10-48. PM Peak Hour Travel Time Corridor Level of Service—Alternative 2

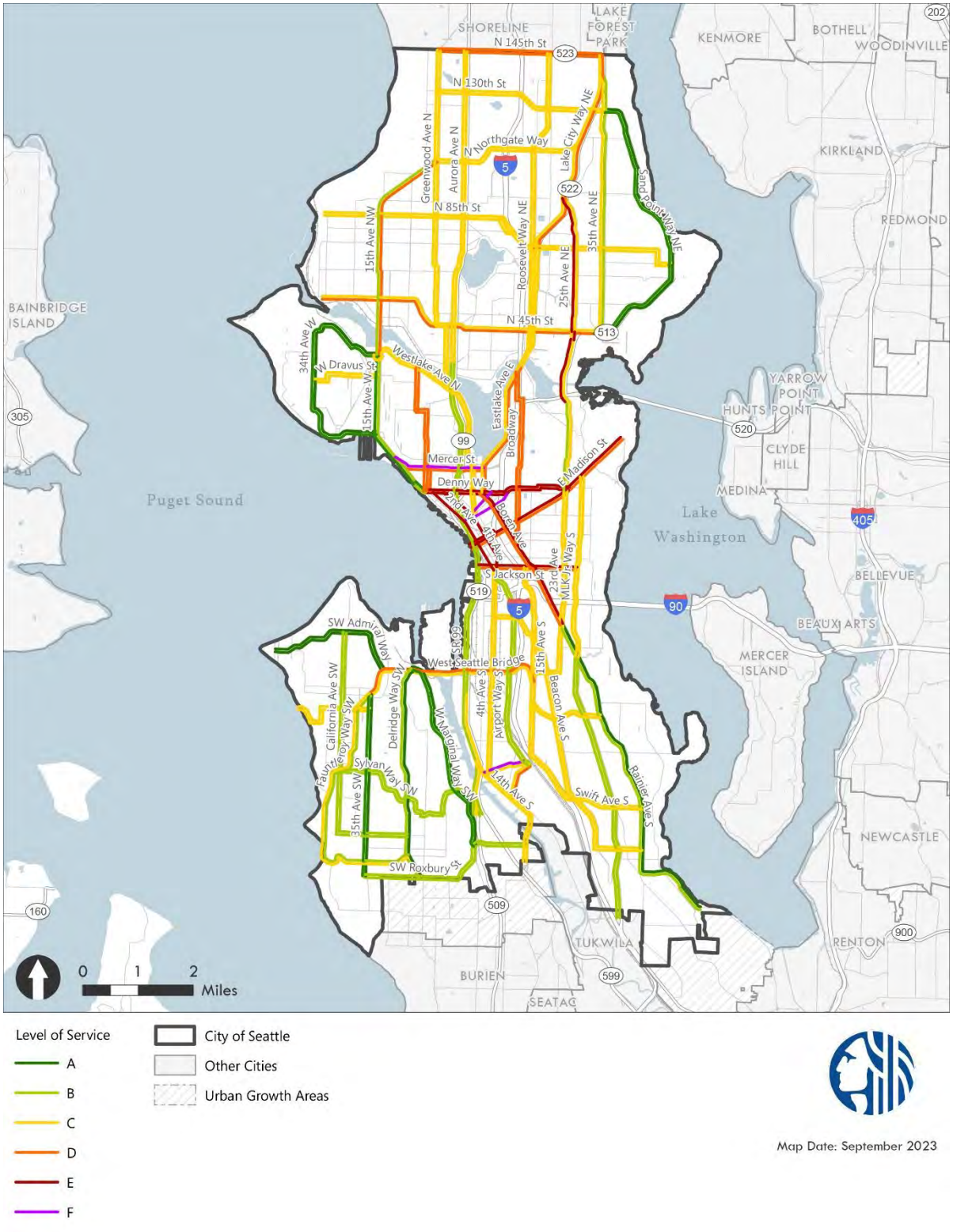
		Alternative 1, No Action Minutes / Level of Service		Alternative 2 Minutes / Level of Service	
Roadway	Extents	N/E	S/W	N/E	S/W
N 145th St	Greenwood Ave N to Lake City Way NE	10.5 / D	9.5 / C	10.5 / D	10 / D
N 130th St	Greenwood Ave N to 35th Ave NE	11.5 / C	12 / C	11.5 / C	12.5 / C
N Northgate Way	Greenwood Ave N to Lake City Way NE	10.5 / C	11 / C	10.5 / C	11 / C
N 85th St	32nd Ave NW to Sand Point Way NE	25 / C	24.5 / C	25 / C	25 / C
N 45th St	32nd Ave NW to Union Bay Pl NE	24.5 / C	23.5 / C	25 / D	24 / C
15th Ave NW	W Emerson St to N 105th St	17 / D	11.5 / B	17 / D	11.5 / B
Greenwood Ave N	Nickerson St to N 145th St	27 / C	25 / C	26.5 / C	25.5 / C
Aurora Ave N	N 38th St to N 145th St	19 / D	16.5 / C	18.5 / C	17 / C
Roosevelt Way NE	Fuhrman Ave E to N 145th St	23 / C	21.5 / C	22.5 / C	22 / C
Lake City Way NE	NE 75th St to N 145th St	14 / D	11 / C	13.5 / D	11 / C
25th Ave NE	E Roanoke St to Lake City Way NE	15 / C	22.5 / E	15 / C	23 / E
35th Ave NE	Union Bay Pl NE to Lake City Way NE	16.5 / B	17.5 / C	16 / B	18 / C
Sand Point Way NE	Union Bay Pl NE to 35th Ave NE	12.5 / A	12 / A	12 / A	12 / A
34th Ave W	15th Ave W to15th Ave W	11.5 / A	12 / A	11.5 / A	12 / A
W Dravus St	34th Ave W to15th Ave W	5 / C	4.5 / C	5 / C	4.5 / C
15th Ave W	Queen Anne Ave N to W Emerson St	8.5 / B	8 / A	8.5 / B	8 / A
Queen Anne Ave N	Denny Way to Nickerson St	12.5 / D	12 / D	12.5 / D	12 / D
SR 99	S Nevada St to N 38th St	11.5 / B	12.5 / B	11.5 / B	12.5 / B
Westlake Ave N	Stewart St to W Emerson St	16 / C	18 / C	16 / C	18.5 / C
Eastlake Ave E	Denny Way to Fuhrman Ave E	12 / D	11.5 / C	12 / D	11.5 / C
Broadway	Boren Ave to Eastlake Ave E	18 / D	18.5 / D	18.5 / D	18.5 / D

Roadway	Extents	Alternative 1, No Action Minutes / Level of Service		Alternative 2 Minutes / Level of Service	
		N/E	S/W	N/E	S/W
23rd Ave	E Madison St to E Roanoke St	6 / C	5 / B	6 / C	5.5 / B
Mercer St	Elliott Ave W to Fairview Ave N	8 / D	14 / F	8 / D	14 / F
Denny Way	Queen Anne Ave N to E Madison St	17.5 / E	16.5 / E	17.5 / E	16.5 / E
2nd Ave	4th Ave S to Denny Way	- / -	12 / E	- / -	12 / E
4th Ave	S Jackson St to Denny Way	10 / E	- / -	10 / E	- / -
Stewart St	1st Ave to Denny Way	- / -	6.5 / F	- / -	6.5 / F
Olive Way	**4th Ave to Denny Way**	7 / F	- / -	**7.5 / F**	- / -
E Madison St	Alaskan Way S to McGilvra Blvd E	20 / D	20 / E	20.5 / D	20.5 / E
Boren Ave	23rd Ave S to Denny Way	18 / E	15.5 / D	18.5 / E	15.5 / D
S Jackson St	Alaskan Way S to MLK Jr. Way S	8.5 / D	11 / E	8.5 / D	11 / E
23rd Ave	15th Ave S to E Madison St	16.5 / C	17.5 / C	16.5 / C	17.5 / C
MLK Jr. Way S	Rainier Ave S to E Madison St	11.5 / B	12 / C	12 / C	12 / C
4th Ave S	E Marginal Way S to S Jackson St	13.5 / C	11.5 / C	13.5 / C	11.5 / C
Airport Way S	S Albro Pl to 4th Ave S	10.5 / B	10 / B	11 / B	10 / B
15th Ave S	S Jackson St to Rainier Ave S	15 / C	16.5 / C	15.5 / C	16.5 / C
E Marginal Way S	S Holden St to S Nevada St	5.5 / C	5 / B	5.5 / C	5 / B
Swift Ave S	Rainier Ave S to S Columbian Way	14 / C	14 / C	14.5 / C	14 / C
Beacon Ave S	Rainier Ave S to 4th Ave S	22 / C	24.5 / C	22 / C	25 / C
MLK Jr. Way S	S Boeing Access Rd to Rainier Ave S	16.5 / B	16.5 / B	16.5 / B	16 / B
Rainier Ave S	Cornell Ave S to 23rd Ave S	18.5 / A	20.5 / B	18.5 / A	20.5 / B
S Michigan St	E Marginal Way S to Airport Way S	3.5 / C	4.5 / F	3.5 / C	4.5 / F
Ellis Ave S	E Marginal Way S to Airport Way S	3 / D	3.5 / C	3 / D	3.5 / C

Roadway	Extents	Alternative 1, No Action Minutes / Level of Service		Alternative 2 Minutes / Level of Service	
		N/E	S/W	N/E	S/W
14th Ave S	S Director St to 1st Ave S	7.5 / C	7 / C	7.5 / C	7 / C
California Ave SW/SW Thistle St	Delridge Way SW to SW Admiral Way	17 / B	17.5 / B	17.5 / B	17.5 / B
Fauntleroy Way SW/SW Barton St	Delridge Way SW to 35th Ave SW	15.5 / B	18 / C	15.5 / B	18 / C
35th Ave SW	SW Roxbury St to Fauntleroy Way SW	8.5 / A	9 / A	8.5 / A	9.5 / A
Delridge Way SW	SW Roxbury St to W Marginal Way SW	11.5 / A	13.5 / B	11.5 / A	13.5 / B
W Marginal Way SW	S Cloverdale St to Delridge Way SW	7.5 / A	8.5 / A	8 / A	8.5 / A
SW Admiral Way	63rd Ave SW to SW Manning St	6.5 / A	7 / A	6.5 / A	7 / A
West Seattle Bridge	35th Ave SW to 15th Ave S	8.5 / C	10 / D	8.5 / C	10.5 / D
SW Alaska St	Beach Dr SW to 35th Ave SW	7 / C	7.5 / C	7 / C	7.5 / C
Sylvan Way SW	California Ave SW to S Holden St	12 / B	11 / B	12 / B	11 / B
SW Roxbury St	35th Ave SW to 14th Ave S	11.5 / B	10.5 / B	11.5 / B	11 / B

Note: Impacted corridors are shown in bold.
Source: Fehr & Peers, 2023.

Exhibit 3.10-49. Alternative 2 PM Peak Hour Travel Time Corridor LOS



Source: Fehr & Peers, 2023.

Screenlines

Exhibit 3.10-50 summarizes PM peak hour screenline V/C ratios for 2044 Alternative 1 and 2044 Alternative 2. The volume forecasts in Alternative 2 are approximately ~~five~~ four percent higher than the Alternative 1 forecasts across all locations. There are six screenlines with V/C ratios higher than 0.90, which is the same as compared with Alternative 1. The screenlines are:

- Ship Canal—Ballard Bridge
- Ship Canal—Fremont Bridge
- Ship Canal—Aurora Ave N
- Duwamish River—1st Ave S and 16th Ave S
- Ship Canal—University and Montlake Bridges
- East of 9th Avenue

While Alternative 2 would cause V/C ratios to increase across many screenlines, none of the screenlines are expected to exceed the established thresholds. Therefore, no significant impacts to screenlines are expected under Alternative 2.

Exhibit 3.10-50. PM Peak Hour Screenline Volume-to-Capacity Ratio—Alternative 2

Screenline	Location	Extents	V/C Threshold	Alternative 1, No Action		Alternative 2	
				N/E	S/W	N/E	S/W
1.11	North City Limit	3rd Ave NW to Aurora Ave N	1.20	0.75	0.65	0.73	0.70
1.12	North City Limit	Meridian Ave N to 15th Ave NE	1.20	0.48	0.39	0.46	0.43
1.13	North City Limit	30th Ave NE to Lake City Way NE	1.20	0.85	0.62	0.83	0.65
2.00	Magnolia	Magnolia Bridge to W Emerson Place	1.00	0.58	0.61	0.62	0.65
3.11	Duwamish River	West Seattle Bridge & Spokane St	1.20	0.72	0.81	0.74	0.86
3.12	Duwamish River	1st Ave S & 16th Ave S	1.20	0.69	0.91	0.69	0.93
4.11	South City Limit	Martin Luther King Jr. Way to Rainier Ave S	1.00	0.83	0.87	0.86	0.89
4.12	South City Limit	Marine Dr SW to Meyers Way S	1.00	0.44	0.49	0.46	0.49
4.13	South City Limit	SR 99 to Airport Way S	1.00	0.63	0.47	0.64	0.48
5.11	Ship Canal	Ballard Bridge	1.20	1.01	0.90	1.06	0.93
5.12	Ship Canal	Fremont Bridge	1.20	1.00	1.03	1.09	1.12
5.13	Ship Canal	Aurora Ave Bridge	1.20	0.96	0.70	0.99	0.73
5.16	Ship Canal	University & Montlake Bridges	1.20	0.74	0.94	0.81	1.00
6.11	South of NW 80th St	Seaview Ave NW to 15th Ave NW	1.00	0.40	0.52	0.40	0.54
6.12	South of N W 80th St	8th Ave NW to Greenwood Ave N	1.00	0.60	0.62	0.61	0.64
6.13	South of NE 80th St	Linden Ave N to 1st Ave NE	1.00	0.51	0.59	0.52	0.62
6.14	South of NE 80th St	5th Ave NE to 15th Ave NE	1.00	0.65	0.69	0.69	0.74
6.15	South of NE 80th St	20th Ave NE to Sand Point Way NE	1.00	0.41	0.39	0.42	0.43
7.11	West of Aurora Ave	Fremont Pl N to N 65th St	1.00	0.64	0.63	0.67	0.66
7.12	West of Aurora Ave	N 80th St to N 145th St	1.00	0.44	0.45	0.45	0.47
8.00	South of Lake Union	Valley St to Denny Way	1.20	0.50	0.35	0.52	0.39

Screenline	Location	Extents	V/C Threshold	Alternative 1, No Action		Alternative 2	
				N/E	S/W	N/E	S/W
9.11	South of Spokane St	Beach Dr SW to W Marginal Way SW	1.00	0.51	0.82	0.53	0.85
9.12	South of Spokane St	E Marginal Way S to Airport Way S	1.00	0.65	0.52	0.66	0.53
9.13	South of Spokane St	15th Ave S to Rainier Ave S	1.00	0.69	0.60	0.71	0.63
10.11	South of S Jackson St	Alaskan Way S to 4th Ave S	1.00	0.81	0.82	0.85	0.86
10.12	South of S Jackson St	12th Ave S to Lakeside Ave S	1.00	0.74	0.74	0.79	0.76
12.12	East of CBD	S Jackson St to Howell St	1.20	0.37	0.44	0.38	0.45
13.11	East of I-5	NE Northgate Way to NE 145th St	1.00	0.70	0.53	0.72	0.54
13.12	East of I-5	NE 65th St to NE 80th St	1.00	0.54	0.50	0.58	0.53
13.3	East of I-5	NE Pacific St to NE Ravenna Blvd	1.00	0.61	0.56	0.67	0.60
A1	North of Seneca St	1st Ave to 6th Ave	N/A	0.63	0.65	0.67	0.67
A2	North of Blanchard	Elliott Ave to Westlake Ave	N/A	0.45	0.37	0.47	0.39
A3	East of 9th Ave	Lenora St to Pike St	N/A	0.46	0.94	0.46	0.95
A4	South of Mercer St	Elliott Ave W to Aurora Ave N	N/A	0.55	0.59	0.58	0.63
A5	East of 5th Ave N	Denny Way to Valley St	N/A	0.41	0.37	0.43	0.42
A6	North of Pine St	Melrose Ave E to 15th Ave E	N/A	0.41	0.42	0.43	0.44
A7	North of James St– E Cherry St	Boren Ave to 14th Ave	N/A	0.56	0.39	0.58	0.41
A8	West of Broadway	Yesler Way to E Roy St	N/A	0.55	0.46	0.58	0.47
A9	South of NE 45th St	7th Ave NE to Montlake Blvd NE	N/A	0.54	0.60	0.57	0.64
A10	East of 15th Ave NE	NE 45th St to NE 52nd St	N/A	0.58	0.53	0.62	0.56
A11	South of Northgate Way (N/NE 110th St)	N Northgate Way to Roosevelt Way NE	N/A	0.46	0.54	0.46	0.57
A12	East of 1st Ave NE	NE 100th St to NE Northgate Way	N/A	0.44	0.51	0.44	0.50

Source: Fehr & Peers, 2023.

Intersection LOS—NE 130th / NE 145th Street Subarea

Exhibit 3.10-51 summarizes the LOS and vehicle delay for each study intersection analyzed based on Alternative 2 conditions. Under Alternative 2, six intersections do not meet the LOS D standard. These intersections, highlighted in bold, are the same impacted intersections as those identified under Alternative 1. Five of the six intersections operate with LOS F conditions.

Under Alternative 2, six intersections are expected to fall below the LOS D threshold; these intersections are the same as those identified under Alternative 1. However, operations are expected to degrade with five of the six intersections falling from LOS E to F. All six intersections would experience at least five additional seconds of delay (the impact threshold) and therefore are considered to have a significant impact under Alternative 2. These include:

- N 145th Street / Aurora Avenue N
- NE 145th Street / 5th Avenue NE
- NE 145th Street / 15th Avenue NE
- N 130th Street / Aurora Avenue N
- N 130th Street / 1st Avenue NE
- NE 125th Street / 15th Avenue NE

Exhibit 3.10-51. 130th/145th Street Subarea PM Peak Hour Level of Service—Alternative 2

ID	Intersection	Alternative 1, No Action—Level of Service / Delay (seconds)	Alternative 2—Level of Service / Delay (seconds)
1	NE 155th St / 5th Ave NE	B / 19	C / 21
2	**N 145th St / Aurora Ave N**	**E / 68**	**F / 83**
3	N 145th St / Meridian Ave N	B / 18	B / 20
4	N 145th St / 1st Ave NE	B / 20	C / 25
5	NE 145th St / I-5 On & Off Ramps	A / 9	A / 9
6	**NE 145th St / 5th Ave NE**	**E / 69**	**F / 85**
7	**NE 145th St / 15th Ave NE**	**E / 66**	**F / 80**
8	N 137th St / Meridian Ave N / Roosevelt Way N	A / 7	A / 8
9	**N 130th St / Aurora Ave N**	**E / 79**	**F / 88**
10	N 130th St / Meridian Ave N	B / 13	B / 14
11	**N 130th St / 1st Ave NE**	**E / 71**	**F / 92**
12	NE 130th St / I-5 On Ramp	A / 2	A / 2
13	NE 130th St / Roosevelt Way NE / 5th Ave NE	D / 38	D / 42
14	Roosevelt Way NE / NE 125th St / 10th Ave NE	B / 17	B / 19
15	**NE 125th St / 15th Ave NE**	**E / 60**	**E / 70**

Note: Impacted intersections are shown in bold.
Source: Fehr & Peers, 2023.

State Facilities

Exhibit 3.10-52 shows a comparison of Alternative 2 forecasted volume to the maximum service volume needed to maintain the LOS standard ~~ratios for Alternative 1 and Alternative 2~~ at each of the identified state facility study locations. ~~V~~Alternative 2 volumes at all locations are expected to remain similar or increase slightly relative to Alternative 1. I-5 at the Ship Canal Bridge and north of the West Seattle Bridge, SR 99 at the Aurora Bridge, and SR 509 at the 1st Avenue Bridge are forecasted to have demand more than 20% over the maximum service volume, indicating substantial vehicle congestion for some hours of the day. The same seven study locations projected to exceed the WSDOT LOS standard under Alternative 1 would do so under Alternative 2. At four of those locations, the ratio is projected to increase by at least 0.01, constituting a significant impact under Alternative 2:

- I-5 at the Ship Canal Bridge
- SR 99 north of N Northgate Way
- SR 99 at the Aurora Avenue Bridge
- SR 522 south of NE 145th Street

The following study locations are also expected to exceed the WSDOT LOS standard, but would have volumes roughly equivalent to Alternative 1, and therefore are not considered to be significant impacts under Alternative 2:

- I-5 north of NE Northgate Way
- I-5 north of the West Seattle Bridge
- SR 509 at the 1st Avenue S Bridge

Because Alternative 2 would cause volumes to increase on multiple state facilities already expected to exceed WSDOT's LOS D standard under Alternative 1, a significant impact to state facilities is expected under Alternative 2.

Exhibit 3.10-52. ~~PM Peak Hour~~Daily State Facilities Level of Service—Alternative 2

Facility	Extents	WSDOT LOS Standard	Alternative 1, No Action—Volume to Maximum Service Volume Ratio	Alternative 2—Volume to Maximum Service Volume Ratio
I-5	North of NE Northgate Way	D	1.03	1.03
I-5	**Ship Canal Bridge**	D	~~1.32~~>1.20	**>1.20**~~1.35~~
I-5	North of West Seattle Bridge	D	>1.20~~1.32~~	>1.20~~1.32~~
I-5	North of Boeing Access Rd Ramp	D	0.98	0.98
I-90	Mt Baker Tunnel	D	0.97	0.99
SR 99	**North of N Northgate Way**	D	1.08	**1.11**
SR 99	**Aurora Ave Bridge**	D	>1.20~~1.30~~	**>1.20**~~1.35~~

Facility	Extents	WSDOT LOS Standard	Alternative 1, No Action—Volume to Maximum Service Volume Ratio	Alternative 2—Volume to Maximum Service Volume Ratio
SR 99	Tunnel	D	0.65	0.66
SR 99	North of West Seattle Bridge	D	0.76	0.77
SR 99	South of S Cloverdale St	E (mitigated)	0.41	0.42
SR 509	1st Ave S Bridge	D	>1.20~~1.25~~	~~1.25~~>1.20
SR 519	S Atlantic St West of I-90 Ramps	D	0.83	0.83
SR 520	Lake Washington Bridge	D	0.86	0.88
SR 522	**South of NE 145th St**	D	1.15	**1.18**

Note: Impacted locations are shown in bold.
A ratio of >1.2 indicates a demand of more than 20% over the maximum service volume, indicating substantial vehicle congestion for some hours of the day. The WSDOT standard is equivalent to a 1.0 (the denominator is the maximum volume at which LOS D can be maintained).
Source: Fehr & Peers, 2023.

Impacts of Alternative 3: Broad

Mode Share

Exhibit 3.10-53 summarizes the SOV mode share expected under Alternative 3. The SoundCast model predicts that Alternative 3 SOV mode shares will be very similar to Alternative 1. The only notable changes are expected in Northeast Seattle and Southeast Seattle where the SOV mode shares would increase slightly, however both subareas would still meet their SOV targets. Although the Duwamish subarea would exceed its target, the difference in mode share relative to Alternative 1 is expected to be less than the 1% impact threshold. Therefore, no mode share impact is expected under Alternative 3.

Exhibit 3.10-53. PM Peak Hour SOV Mode Share—Alternative 3

Subarea	SOV Target	Alternative 1, No Action SOV Share	Alternative 3 SOV Share
(1) Northwest Seattle	37%	34%	34%
(2) Northeast Seattle	35%	26%	27%
(3) Queen Anne/Magnolia	38%	34%	34%
(4) Downtown/Lake Union	18%	11%	11%
(5) Capitol Hill/Central District	28%	27%	27%
(6) West Seattle	35%	35%	35%
(7) Duwamish	51%	67%	67%

Subarea	SOV Target	Alternative 1, No Action SOV Share	Alternative 3 SOV Share
(8) Southeast Seattle	38%	31%	32%

Note: Existing (2017-2019) mode share data from the PSRC household travel survey have substantial margins of error. See **Exhibit 3.10-10** for margins of error by subarea.
Source: Fehr & Peers, 2023.

Exhibit 3.10-54 compares the number of daily person trips expected by mode under 2044 Alternative 1 and Alternative 3. Citywide, Alternative 3 is expected to result in approximately 138,000 additional person trips than Alternative 1, an increase of ~~3~~2%. The increase among modes varies more than was the case under Alternative 2. In particular, the number of trips by transit and biking is only expected to increase by approximately 1% while the number of trips by driving and walking would increase by 3 to 4%.

Exhibit 3.10-54. Daily Person Trips by Mode—Alternative 3

Mode	Alternative 1, No Action	Alternative 3
SOV	1,783,000	1,853,000
HOV	1,440,000	1,473,000
Transit	1,138,000	1,142,000
Walk	1,378,000	1,408,000
Bike	99,000	100,000
Total	**5,838,000**	**5,976,000**

Source: Fehr & Peers, 2023.

Transit

Exhibit 3.10-55 summarizes the projected load factors on the busiest segment of each route in the peak direction of travel. Passenger loads under Alternative 3 are generally lower than those forecasted under Alternative 2; however, the same study routes would be impacted. Study routes that would have a transit capacity impact under Alternative 3 are shown in bold in **Exhibit 3.10-55**. The impacted routes include:

- RapidRide E Line—Downtown to Aurora Village
- RapidRide J Line—Downtown to University District
- RapidRide R Line—Downtown to Rainier Valley
- RapidRide Fremont

Exhibit 3.10-55. PM Peak Hour Average Passenger Load Factors—Alternative 3

Transit Route	Maximum Passenger Load Factor in Peak Direction	
	Alternative 1, No Action	Alternative 3
Link light rail—1 Line	1.08	1.00
Link light rail—2 Line	1.29	1.25
Link light rail—3 Line	1.29	1.26
RapidRide C Line—Westwood Village to Alaska Junction	0.71	0.78
RapidRide E Line—Downtown to Aurora Village	1.89	**2.00**
RapidRide G Line—Downtown to Madison Valley	0.35	0.37
RapidRide H Line—Alki to Burien	0.77	0.87
RapidRide J Line—Downtown to University District	1.97	**2.14**
RapidRide R Line—Downtown to Rainier Valley	1.07	**1.18**
RapidRide 23rd	0.47	0.45
RapidRide 65th (replaces Route 62)	0.82	0.87
RapidRide Beacon	0.50	0.51
RapidRide Denny	2.83	2.77
RapidRide Fremont (replaces Route 40)	1.49	**1.63**
RapidRide Green Lake	0.47	0.44
RapidRide Market	0.76	0.70

Note: Impacted routes are shown in bold.
Source: Fehr & Peers, 2023.

Roadway Users

This section summarizes roadway conditions expected under Alternative 3.

VMT / VHT / Average Trip Speed

Exhibit 3.10-56 summarizes VMT, VHT and average trip speed under Alternative 3 relative to Alternative 1. As with Alternative 2, total daily VMT generated under Alternative 3 is expected to increase compared to Alternative 1; however, the increase is minimal at 1%. The VMT per capita is expected to decrease slightly from approximately 13.7 miles per day to 13.5 miles per day. This incremental difference may reflect slight changes in travel behavior in terms of mode choice and average trip lengths.

Similarly, VHT is projected to increase in total compared to Alternative 1 but would remain flat on a per capita basis at approximately a half hour of daily travel by private car or truck. The average trip speed is expected to stay essentially flat relative to Alternative 1.

Exhibit 3.10-56. Daily VMT, VHT, and Average Trip Speed—Alternative 3

	Alternative 1, No Action		Alternative 3	
Metric	Total	Per Capita	Total	Per Capita
VMT	24,357,100	13.7	24,593,100	13.5
VHT	865,800	0.5	873,000	0.5
Average Trip Speed	28.1	—	28.2	—

Source: Fehr & Peers, 2023.

Because the VMT per capita under Alternative 3 would not exceed the level under Alternative 1, no impact to VMT per capita is identified under Alternative 3.

Travel Time

Exhibit 3.10-57 summarizes PM peak hour corridor travel times under Alternative 3 compared to Alternative 1.[93] **Exhibit 3.10-58** shows the LOS values along associated corridors on the map. All corridor travel times are expected to be within 0.5 minutes of Alternative 1 with most corridors seeing slight increases. Under Alternative 1, 77 corridors (with each direction counted separately) are expected to operate at LOS A-C, 15 at LOS D, 8 operating at LOS E, and 4 operating at LOS F. Under Alternative 3, 75 corridors are expected to operate at LOS A-C, 17 at LOS D, 8 operating at LOS E, and 4 operating at LOS F.

Alternative 1 and Alternative 3 are expected to result in the same four corridors operating at LOS F, one of which would have an increase in excess of the 5% threshold of significance. Therefore, a travel time impact is expected under Alternative 3 on one corridor (shown in bold in **Exhibit 3.10-57**):

- Olive Way between 4th Avenue and Denny Way

[93] For corridors with peak directional patterns, the AM peak hour would typically reflect similar conditions in the opposite direction from those shown for the PM peak hour.

Exhibit 3.10-57. PM Peak Hour Travel Time Corridor Level of Service—Alternative 3

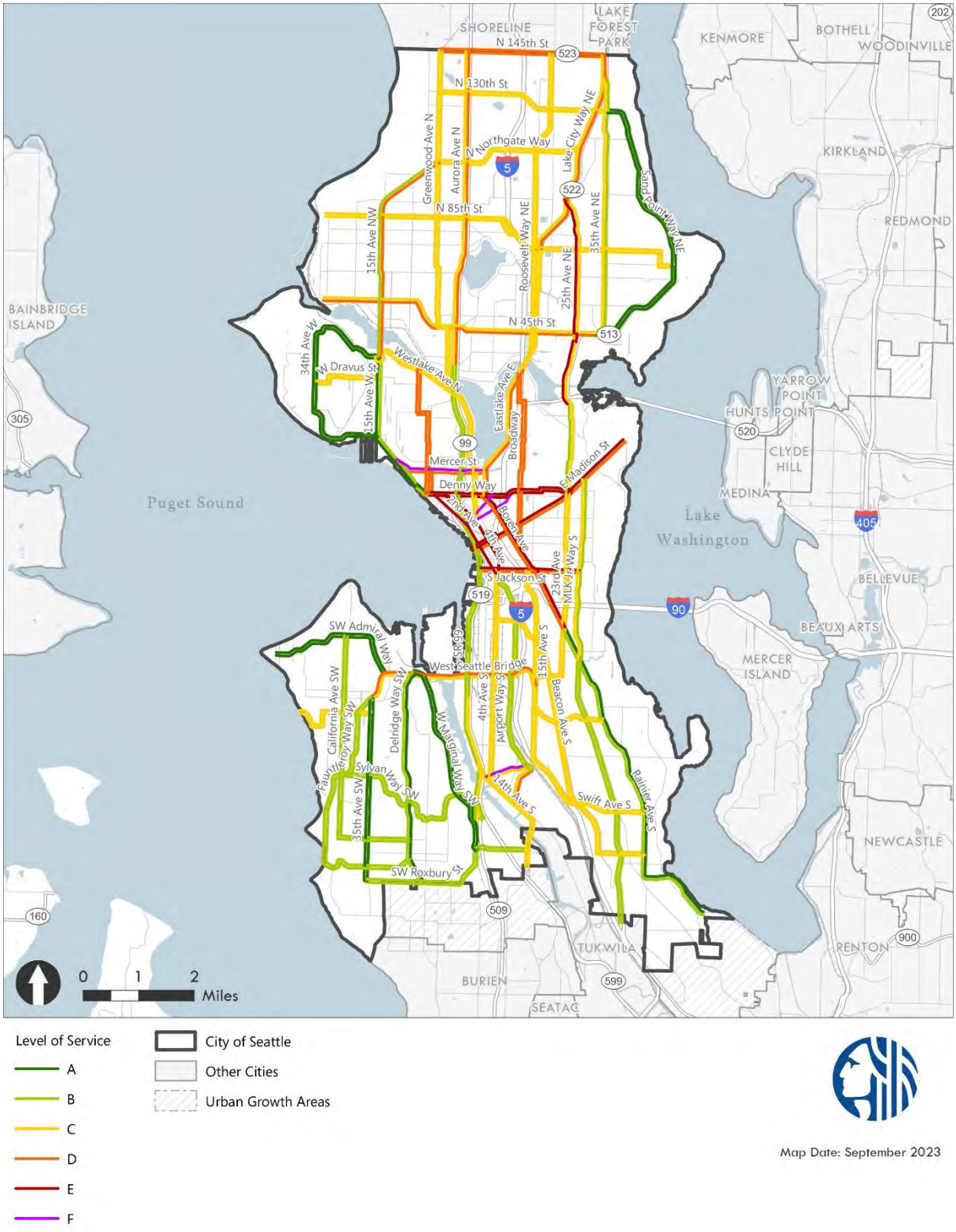
		Alternative 1, No Action, Minutes / Level of Service		Alternative 3 Minutes / Level of Service	
Roadway	Extents	N/E	S/W	N/E	S/W
N 145th St	Greenwood Ave N to Lake City Way NE	10.5 / D	9.5 / C	10.5 / D	10 / D
N 130th St	Greenwood Ave N to 35th Ave NE	11.5 / C	12 / C	12 / C	12.5 / C
N Northgate Way	Greenwood Ave N to Lake City Way NE	10.5 / C	11 / C	11 / C	11 / C
N 85th St	32nd Ave NW to Sand Point Way NE	25 / C	24.5 / C	25 / C	25 / C
N 45th St	32nd Ave NW to Union Bay Pl NE	24.5 / C	23.5 / C	25 / D	24 / C
15th Ave NW	W Emerson St to N 105th St	17 / D	11.5 / B	17.5 / D	11.5 / B
Greenwood Ave N	Nickerson St to N 145th St	27 / C	25 / C	27.5 / C	25.5 / C
Aurora Ave N	N 38th St to N 145th St	19 / D	16.5 / C	19 / D	17 / C
Roosevelt Way NE	Fuhrman Ave E to N 145th St	23 / C	21.5 / C	23 / C	22 / C
Lake City Way NE	NE 75th St to N 145th St	14 / D	11 / C	14 / D	11 / C
25th Ave NE	E Roanoke St to Lake City Way NE	15 / C	22.5 / E	15 / C	23 / E
35th Ave NE	Union Bay Pl NE to Lake City Way NE	16.5 / B	17.5 / C	16.5 / B	18 / C
Sand Point Way NE	Union Bay Pl NE to 35th Ave NE	12.5 / A	12 / A	12.5 / A	12 / A
34th Ave W	15th Ave W to15th Ave W	11.5 / A	12 / A	11.5 / A	12 / A
W Dravus St	34th Ave W to15th Ave W	5 / C	4.5 / C	5.5 / C	4.5 / C
15th Ave W	Queen Anne Ave N to W Emerson St	8.5 / B	8 / A	9 / B	8 / A
Queen Anne Ave N	Denny Way to Nickerson St	12.5 / D	12 / D	12.5 / D	12 / D
SR 99	S Nevada St to N 38th St	11.5 / B	12.5 / B	11.5 / B	12.5 / B
Westlake Ave N	Stewart St to W Emerson St	16 / C	18 / C	16.5 / C	18 / C
Eastlake Ave E	Denny Way to Fuhrman Ave E	12 / D	11.5 / C	12 / D	11.5 / C
Broadway	Boren Ave to Eastlake Ave E	18 / D	18.5 / D	18.5 / D	18.5 / D

Roadway	Extents	Alternative 1, No Action, Minutes / Level of Service		Alternative 3 Minutes / Level of Service	
		N/E	S/W	N/E	S/W
23rd Ave	E Madison St to E Roanoke St	6 / C	5 / B	6 / C	5 / B
Mercer St	Elliott Ave W to Fairview Ave N	8 / D	14 / F	8 / D	14 / F
Denny Way	Queen Anne Ave N to E Madison St	17.5 / E	16.5 / E	17.5 / E	16.5 / E
2nd Ave	4th Ave S to Denny Way	- / -	12 / E	- / -	12 / E
4th Ave	S Jackson St to Denny Way	10 / E	- / -	10 / E	- / -
Stewart St	1st Ave to Denny Way	- / -	6.5 / F	- / -	6.5 / F
Olive Way	**4th Ave to Denny Way**	7 / F	- / -	**7.5 / F**	- / -
E Madison St	Alaskan Way S to McGilvra Blvd E	20 / D	20 / E	20.5 / D	20 / E
Boren Ave	23rd Ave S to Denny Way	18 / E	15.5 / D	18 / E	15.5 / D
S Jackson St	Alaskan Way S to MLK Jr. Way S	8.5 / D	11 / E	9 / D	11 / E
23rd Ave	15th Ave S to E Madison St	16.5 / C	17.5 / C	16.5 / C	17.5 / C
MLK Jr. Way S	Rainier Ave S to E Madison St	11.5 / B	12 / C	11.5 / B	12 / C
4th Ave S	E Marginal Way S to S Jackson St	13.5 / C	11.5 / C	13.5 / C	11.5 / C
Airport Way S	S Albro Pl to 4th Ave S	10.5 / B	10 / B	10.5 / B	10 / B
15th Ave S	S Jackson St to Rainier Ave S	15 / C	16.5 / C	15.5 / C	17 / C
E Marginal Way S	S Holden St to S Nevada St	5.5 / C	5 / B	5 / C	5 / B
Swift Ave S	Rainier Ave S to S Columbian Way	14 / C	14 / C	14.5 / C	14.5 / C
Beacon Ave S	Rainier Ave S to 4th Ave S	22 / C	24.5 / C	22.5 / C	25 / C
MLK Jr. Way S	S Boeing Access Rd to Rainier Ave S	16.5 / B	16.5 / B	16.5 / B	16.5 / B
Rainier Ave S	Cornell Ave S to 23rd Ave S	18.5 / A	20.5 / B	18.5 / A	20.5 / B
S Michigan St	E Marginal Way S to Airport Way S	3.5 / C	4.5 / F	3.5 / C	4.5 / F
Ellis Ave S	E Marginal Way S to Airport Way S	3 / D	3.5 / C	3 / D	3.5 / C

Roadway	Extents	Alternative 1, No Action, Minutes / Level of Service		Alternative 3 Minutes / Level of Service	
		N/E	S/W	N/E	S/W
14th Ave S	S Director St to 1st Ave S	7.5 / C	7 / C	7.5 / C	7 / C
California Ave SW/SW Thistle St	Delridge Way SW to SW Admiral Way	17 / B	17.5 / B	17.5 / B	17.5 / B
Fauntleroy Way SW/SW Barton St	Delridge Way SW to 35th Ave SW	15.5 / B	18 / C	15.5 / B	17.5 / B
35th Ave SW	SW Roxbury St to Fauntleroy Way SW	8.5 / A	9 / A	8.5 / A	9 / A
Delridge Way SW	SW Roxbury St to W Marginal Way SW	11.5 / A	13.5 / B	11.5 / A	13.5 / B
W Marginal Way SW	S Cloverdale St to Delridge Way SW	7.5 / A	8.5 / A	8 / A	8.5 / A
SW Admiral Way	63rd Ave SW to SW Manning St	6.5 / A	7 / A	6.5 / A	7 / A
West Seattle Bridge	35th Ave SW to 15th Ave S	8.5 / C	10 / D	8.5 / C	10.5 / D
SW Alaska St	Beach Dr SW to 35th Ave SW	7 / C	7.5 / C	7 / C	7.5 / C
Sylvan Way SW	California Ave SW to S Holden St	12 / B	11 / B	12 / B	11 / B
SW Roxbury St	35th Ave SW to 14th Ave S	11.5 / B	10.5 / B	11.5 / B	11 / B

Note: Impacted corridors are shown in bold.
Source: Fehr & Peers, 2023.

Exhibit 3.10-58. Alternative 3 Travel Time Corridor LOS



Source: Fehr & Peers, 2023.

Screenlines

Exhibit 3.10-59 summarizes PM peak hour screenline V/C ratios for 2044 Alternative 1 and 2044 Alternative 3. The volume forecasts in Alternative 3 are approximately ~~five~~ four percent higher than the Alternative 1 forecasts across all locations (similar to Alternative 2). Under Alternative 3, seven screenlines are expected to operate with V/C ratios higher than 0.90, compared with six in Alternative 1. The screenlines are:

- Ship Canal—Ballard Bridge
- Ship Canal—Fremont Bridge
- Ship Canal—Aurora Ave N
- Duwamish River—1st Ave S and 16th Ave S
- Ship Canal—University and Montlake Bridges
- East of 9th Avenue
- South City Limit—Martin Luther King Jr Wy to Rainier Ave S (Alternative 3 only)

While Alternative 3 would cause V/C ratios to increase across many screenlines, none are expected to exceed the established thresholds. Therefore, no significant impacts to screenlines are expected under Alternative 3.

Exhibit 3.10-59. Screenline Volume-to-Capacity Ratio—Alternative 3

Screenline	Location	Extents	V/C Threshold	Alternative 1, No Action		Alternative 3	
				N/E	S/W	N/E	S/W
1.11	North City Limit	3rd Ave NW to Aurora Ave N	1.20	0.75	0.65	0.74	0.71
1.12	North City Limit	Meridian Ave N to 15th Ave NE	1.20	0.48	0.39	0.45	0.42
1.13	North City Limit	30th Ave NE to Lake City Way NE	1.20	0.85	0.62	0.83	0.66
2.00	Magnolia	Magnolia Bridge to W Emerson Place	1.00	0.58	0.61	0.62	0.65
3.11	Duwamish River	West Seattle Bridge & Spokane St	1.20	0.72	0.81	0.74	0.85
3.12	Duwamish River	1st Ave S & 16th Ave S	1.20	0.69	0.91	0.70	0.93
4.11	South City Limit	Martin Luther King Jr. Way to Rainier Ave S	1.00	0.83	0.87	0.86	0.92
4.12	South City Limit	Marine Dr SW to Meyers Way S	1.00	0.44	0.49	0.46	0.50
4.13	South City Limit	SR 99 to Airport Way S	1.00	0.63	0.47	0.63	0.47
5.11	Ship Canal	Ballard Bridge	1.20	1.01	0.90	1.06	0.93
5.12	Ship Canal	Fremont Bridge	1.20	1.00	1.03	1.11	1.11
5.13	Ship Canal	Aurora Ave Bridge	1.20	0.96	0.70	0.99	0.72
5.16	Ship Canal	University & Montlake Bridges	1.20	0.74	0.94	0.79	0.99
6.11	South of NW 80th St	Seaview Ave NW to 15th Ave NW	1.00	0.40	0.52	0.43	0.56
6.12	South of N W 80th St	8th Ave NW to Greenwood Ave N	1.00	0.60	0.62	0.63	0.64
6.13	South of NE 80th St	Linden Ave N to 1st Ave NE	1.00	0.51	0.59	0.53	0.62
6.14	South of NE 80th St	5th Ave NE to 15th Ave NE	1.00	0.65	0.69	0.72	0.75
6.15	South of NE 80th St	20th Ave NE to Sand Point Way NE	1.00	0.41	0.39	0.45	0.42
7.11	West of Aurora Ave	Fremont Pl N to N 65th St	1.00	0.64	0.63	0.67	0.65
7.12	West of Aurora Ave	N 80th St to N 145th St	1.00	0.44	0.45	0.47	0.49
8.00	South of Lake Union	Valley St to Denny Way	1.20	0.50	0.35	0.52	0.37

Screenline	Location	Extents	V/C Threshold	Alternative 1, No Action		Alternative 3	
				N/E	S/W	N/E	S/W
9.11	South of Spokane St	Beach Dr SW to W Marginal Way SW	1.00	0.51	0.82	0.53	0.86
9.12	South of Spokane St	E Marginal Way S to Airport Way S	1.00	0.65	0.52	0.65	0.53
9.13	South of Spokane St	15th Ave S to Rainier Ave S	1.00	0.69	0.60	0.70	0.63
10.11	South of S Jackson St	Alaskan Way S to 4th Ave S	1.00	0.81	0.82	0.82	0.84
10.12	South of S Jackson St	12th Ave S to Lakeside Ave S	1.00	0.74	0.74	0.77	0.75
12.12	East of CBD	S Jackson St to Howell St	1.20	0.37	0.44	0.38	0.44
13.11	East of I-5	NE Northgate Way to NE 145th St	1.00	0.70	0.53	0.75	0.55
13.12	East of I-5	NE 65th St to NE 80th St	1.00	0.54	0.50	0.59	0.55
13.3	East of I-5	NE Pacific St to NE Ravenna Blvd	1.00	0.61	0.56	0.66	0.60
A1	North of Seneca St	1st Ave to 6th Ave	N/A	0.63	0.65	0.64	0.65
A2	North of Blanchard	Elliott Ave to Westlake Ave	N/A	0.45	0.37	0.45	0.38
A3	East of 9th Ave	Lenora St to Pike St	N/A	0.46	0.94	0.46	0.93
A4	South of Mercer St	Elliott Ave W to Aurora Ave N	N/A	0.55	0.59	0.57	0.62
A5	East of 5th Ave N	Denny Way to Valley St	N/A	0.41	0.37	0.42	0.40
A6	North of Pine St	Melrose Ave E to 15th Ave E	N/A	0.41	0.42	0.43	0.42
A7	North of James St– E Cherry St	Boren Ave to 14th Ave	N/A	0.56	0.39	0.57	0.40
A8	West of Broadway	Yesler Way to E Roy St	N/A	0.55	0.46	0.57	0.46
A9	South of NE 45th St	7th Ave NE to Montlake Blvd NE	N/A	0.54	0.60	0.57	0.63
A10	East of 15th Ave NE	NE 45th St to NE 52nd St	N/A	0.58	0.53	0.62	0.56
A11	South of Northgate Way (N/NE 110th St)	N Northgate Way to Roosevelt Way NE	N/A	0.46	0.54	0.49	0.57
A12	East of 1st Ave NE	NE 100th St to NE Northgate Way	N/A	0.44	0.51	0.46	0.53

Source: Fehr & Peers, 2023.

Intersection LOS—NE 130th / NE 145th Street Subarea

Under Alternative 3, Sound Transit would provide transit investments but the 130th / NE 145th Street Station Area Plan would not be implemented and the area would grow with citywide place types.

Exhibit 3.10-60 summarizes the LOS and vehicle delay for each study intersection under Alternative 3. The same six intersections that are identified as impacts under Alternative 1 and Alternative 2 would also be impacted under Alternative 3. Delays under Alternative 3 would be longer than under Alternative 2. These impacted intersections, all of which are expected to operate at LOS F, include:

- N 145th Street / Aurora Avenue N
- NE 145th Street / 5th Avenue NE
- NE 145th Street / 15th Avenue NE
- N 130th Street / Aurora Avenue N
- N 130th Street / 1st Avenue NE
- NE 125th Street / 15th Avenue NE

Exhibit 3.10-60. 130th/145th Street Subarea PM Peak Hour Level of Service—Alternative 3

ID	Intersection	Alternative 1, No Action—Level of Service / Delay (seconds)	Alternative 3—Level of Service / Delay (seconds)
1	NE 155th St / 5th Ave NE	B / 19	C / 21
2	**N 145th St / Aurora Ave N**	**E / 68**	**F / 86**
3	N 145th St / Meridian Ave N	B / 18	B / 20
4	N 145th St / 1st Ave NE	B / 20	C / 25
5	NE 145th St / I-5 On & Off Ramps	A / 9	A / 9
6	**NE 145th St / 5th Ave NE**	**E / 69**	**F / 92**
7	**NE 145th St / 15th Ave NE**	**E / 66**	**F / 81**
8	N 137th St / Meridian Ave N / Roosevelt Way N	A / 7	A / 8
9	**N 130th St / Aurora Ave N**	**E / 79**	**F / 96**
10	N 130th St / Meridian Ave N	B / 13	B / 19
11	**N 130th St / 1st Ave NE**	**E / 71**	**F / 107**
12	NE 130th St / I-5 On Ramp	A / 2	A / 2
13	NE 130th St / Roosevelt Way NE / 5th Ave NE	D / 38	D / 47
14	Roosevelt Way NE / NE 125th St / 10th Ave NE	B / 17	B / 19
15	**NE 125th St / 15th Ave NE**	**E / 60**	**F / 81**

Note: Impacted intersections are shown in bold.
Source: Fehr & Peers, 2023.

State Facilities

Exhibit 3.10-61 compares Alternative 3 forecasted volume to the maximum service volume needed to maintain the LOS standard ~~ratios for Alternative 1 and Alternative 3~~ at each of the state facility study locations. ~~V~~Alternative 3 volumes at all locations are expected to remain similar or increase slightly relative to Alternative 1. I-5 at the Ship Canal Bridge and north of the West Seattle Bridge, SR 99 at the Aurora Bridge, and SR 509 at the 1st Avenue Bridge are forecasted to have demand more than 20% over the maximum service volume, indicating substantial vehicle congestion for some hours of the day. The same seven study locations are projected to exceed the WSDOT LOS standard under Alternative 1 would do so under Alternative 3. At four of those locations, the ratio is projected to increase by at least 0.01, constituting a significant impact under Alternative 3:

- I-5 at the Ship Canal Bridge
- SR 99 north of N Northgate Way
- SR 99 at the Aurora Avenue Bridge
- SR 522 south of NE 145th Street

The following study locations are also expected to exceed the WSDOT LOS standard, but would have volumes roughly equivalent to Alternative 1, and therefore are not considered to be significant impacts under Alternative 3:

- I-5 north of NE Northgate Way
- I-5 north of the West Seattle Bridge
- SR 509 at the 1st Avenue S Bridge

Because Alternative 3 would cause volumes to increase on multiple state facilities already expected to exceed WSDOT's LOS D standard under Alternative 1, a significant impact to state facilities is expected under Alternative 3.

Exhibit 3.10-61. Daily State Facilities Level of Service—Alternative 3

Facility	Extents	WSDOT LOS Standard	Alternative 1, No Action—Volume to Maximum Service Volume Ratio	Alternative 3—Volume to Maximum Service Volume Ratio
I-5	North of NE Northgate Way	D	1.03	1.03
I-5	**Ship Canal Bridge**	D	~~1.32~~>1.20	**>1.20**~~1.35~~
I-5	North of West Seattle Bridge	D	>1.20~~1.32~~	>1.20~~1.32~~
I-5	North of Boeing Access Rd Ramp	D	0.98	0.98
I-90	Mt Baker Tunnel	D	0.97	0.99
SR 99	**North of N Northgate Way**	D	1.08	**1.14**
SR 99	**Aurora Ave Bridge**	D	>1.20~~1.30~~	**>1.20**~~1.35~~
SR 99	Tunnel	D	0.65	0.68

Facility	Extents	WSDOT LOS Standard	Alternative 1, No Action—Volume to Maximum Service Volume Ratio	Alternative 3—Volume to Maximum Service Volume Ratio
SR 99	North of West Seattle Bridge	D	0.76	0.77
SR 99	South of S Cloverdale St	E (mitigated)	0.41	0.42
SR 509	1st Ave S Bridge	D	>1.20~~1.25~~	>1.20~~1.25~~
SR 519	S Atlantic St West of I-90 Ramps	D	0.83	0.83
SR 520	Lake Washington Bridge	D	0.86	0.87
SR 522	**South of NE 145th St**	D	1.15	**1.18**

Note: Impacted routes are shown in bold.
A ratio of >1.2 indicates a demand of more than 20% over the maximum service volume, indicating substantial vehicle congestion for some hours of the day. The WSDOT standard is equivalent to a 1.0 (the denominator is the maximum volume at which LOS D can be maintained).
Source: Fehr & Peers, 2023.

Impacts of Alternative 5: Combined

Mode Share

Exhibit 3.10-62 summarizes the SOV mode share expected under Alternative 5. The SoundCast model predicts that Alternative 5 SOV mode shares will be essentially the same as Alternative 1. Although the Duwamish subarea would exceed its target, the difference in mode share relative to Alternative 1 is expected to be less than the 1% impact threshold. Therefore, no mode share impact is expected under Alternative 5.

Exhibit 3.10-62. PM Peak Hour SOV Mode Share—Alternative 5

Subarea	SOV Target	Alternative 1, No Action SOV Share	Alternative 5 SOV Share
(1) Northwest Seattle	37%	34%	34%
(2) Northeast Seattle	35%	26%	26%
(3) Queen Anne/Magnolia	38%	34%	34%
(4) Downtown/Lake Union	18%	11%	11%
(5) Capitol Hill/Central District	28%	27%	27%
(6) West Seattle	35%	35%	35%
(7) Duwamish	51%	67%	67%
(8) Southeast Seattle	38%	31%	31%

Note: Existing (2017-2019) mode share data from the PSRC household travel survey have substantial margins of error. See **Exhibit 3.10-10** for margins of error by subarea.
Source: Fehr & Peers, 2023.

Exhibit 3.10-63 compares the number of daily person trips expected by mode under 2044 Alternative 1 and Alternative 5. Citywide, Alternative 5 is expected to result in approximately 343,000 additional person trips compared to Alternative 1, an increase of ~~8~~6%. This is the highest growth among the action alternatives as Alternative 5 assumes the highest growth in residential and employment growth. The increase is spread fairly evenly across modes. In other words, while Alternative 5 would result in more trips, the underlying travel behavior and mode shares expected are very similar between the alternatives.

Exhibit 3.10-63. Daily Person Trips by Mode—Alternative 5

Mode	Alternative 1, No Action	Alternative 5
SOV	1,783,000	1,908,000
HOV	1,440,000	1,537,000
Transit	1,138,000	1,178,000
Walk	1,378,000	1,453,000
Bike	99,000	105,000
Total	**5,838,000**	**6,181,000**

Source: Fehr & Peers, 2023.~~Transit~~

Transit

Exhibit 3.10-64 summarizes the projected load factors on the busiest segment of each route in the peak direction of travel with impacts shown in bold. As with Alternatives 2 and 3, the following study routes would be impacted under Alternative 5:

- RapidRide E Line—Downtown to Aurora Village
- RapidRide J Line—Downtown to University District
- RapidRide R Line—Downtown to Rainier Valley
- RapidRide Fremont

Exhibit 3.10-64. PM Peak Hour Average Passenger Load Factors—Alternative 5

	Maximum Passenger Load Factor in Peak Direction	
Transit Route	Alternative 1, No Action	Alternative 5
Link light rail—1 Line	1.08	1.06
Link light rail—2 Line	1.29	1.32
Link light rail—3 Line	1.29	1.21
RapidRide C Line—Westwood Village to Alaska Junction	0.71	0.90
RapidRide E Line—Downtown to Aurora Village	1.89	**2.01**
RapidRide G Line—Downtown to Madison Valley	0.35	0.39

Transit Route	Maximum Passenger Load Factor in Peak Direction	
	Alternative 1, No Action	Alternative 5
RapidRide H Line—Alki to Burien	0.77	0.84
RapidRide J Line—Downtown to University District	1.97	**2.66**
RapidRide R Line—Downtown to Rainier Valley	1.07	**1.19**
RapidRide 23rd	0.47	0.48
RapidRide 65th (replaces Route 62)	0.82	0.97
RapidRide Beacon	0.50	0.59
RapidRide Denny	2.83	2.53
RapidRide Fremont (replaces Route 40)	1.49	**1.66**
RapidRide Green Lake	0.47	0.41
RapidRide Market	0.76	0.78

Note: Impacted routes are shown in bold.
Source: Fehr & Peers, 2023.

Roadway Users

Alternative 5 assumes the most extensive changes to Seattle's land use patterns. Accordingly, Alternative 5 is projected to have the highest increase in vehicle volumes, compared to Alternative 1. Results are summarized in the following sections.

VMT / VHT / Average Trip Speed

Exhibit 3.10-65 summarizes VMT, VHT and average trip speed under Alternative 5 relative to Alternative 1. Among the action alternatives, Alternative 5 would result in the highest total VMT (3.1% over No Action) and VHT (4.6% over No Action) because it assumes a higher level of growth. Consequently, it also assumes the lowest average trip speed at just under 28 mph. However, despite the increase in VMT, the VMT per capita would be the lowest among the action alternatives at 13.4 VMT per Seattle resident and employee. The VHT per capita under Alternative 5 would essentially flat relative to the other 2044 alternatives.

Exhibit 3.10-65. Daily VMT, VHT, and Average Trip Speed—Alternative 5

Metric	Alternative 1, No Action		Alternative 5	
	Total	Per Capita	Total	Per Capita
VMT	24,357,100	13.7	25,122,100	13.4
VHT	865,800	0.5	905,700	0.5
Average Trip Speed	28.1	—	27.7	—

Source: Fehr & Peers, 2023.

Because the VMT per capita under Alternative 5 would not exceed the level under Alternative 1, no impact to VMT per capita is identified under Alternative 5.

Travel Time

Exhibit 3.10-66 summarizes PM peak hour corridor travel times under Alternative 5 compared to Alternative 1.[94] **Exhibit 3.10-67** displays the LOS values along associated corridors on the map. Because Alternative 5 includes higher citywide growth levels than the other action alternatives, it is expected to result in higher travel time increases as well. Corridor travel times are expected to increase by up to one minute compared to Alternative 1 and no corridors are expected to see decreases. Under Alternative 1, 77 corridors (with each direction counted separately) are expected to operate at LOS A-C, 15 at LOS D, 8 operating at LOS E, and 4 operating at LOS F. Under Alternative 5, 72 corridors are expected to operate at LOS A-C, 20 at LOS D, 8 operating at LOS E, and 4 operating at LOS F.

Alternative 1 and Alternative 5 are expected to result in the same four corridors operating at LOS F, one of which would have an increase in excess of the 5% threshold of significance. Therefore, a travel time impact is expected under Alternative 5 on one corridor (shown in bold in **Exhibit 3.10-66**):

- Olive Way between 4th Avenue and Denny Way

[94] For corridors with peak directional patterns, the AM peak hour would typically reflect similar conditions in the opposite direction from those shown for the PM peak hour.

Exhibit 3.10-66 PM Peak Hour Travel Time Corridor Level of Service—Alternative 5

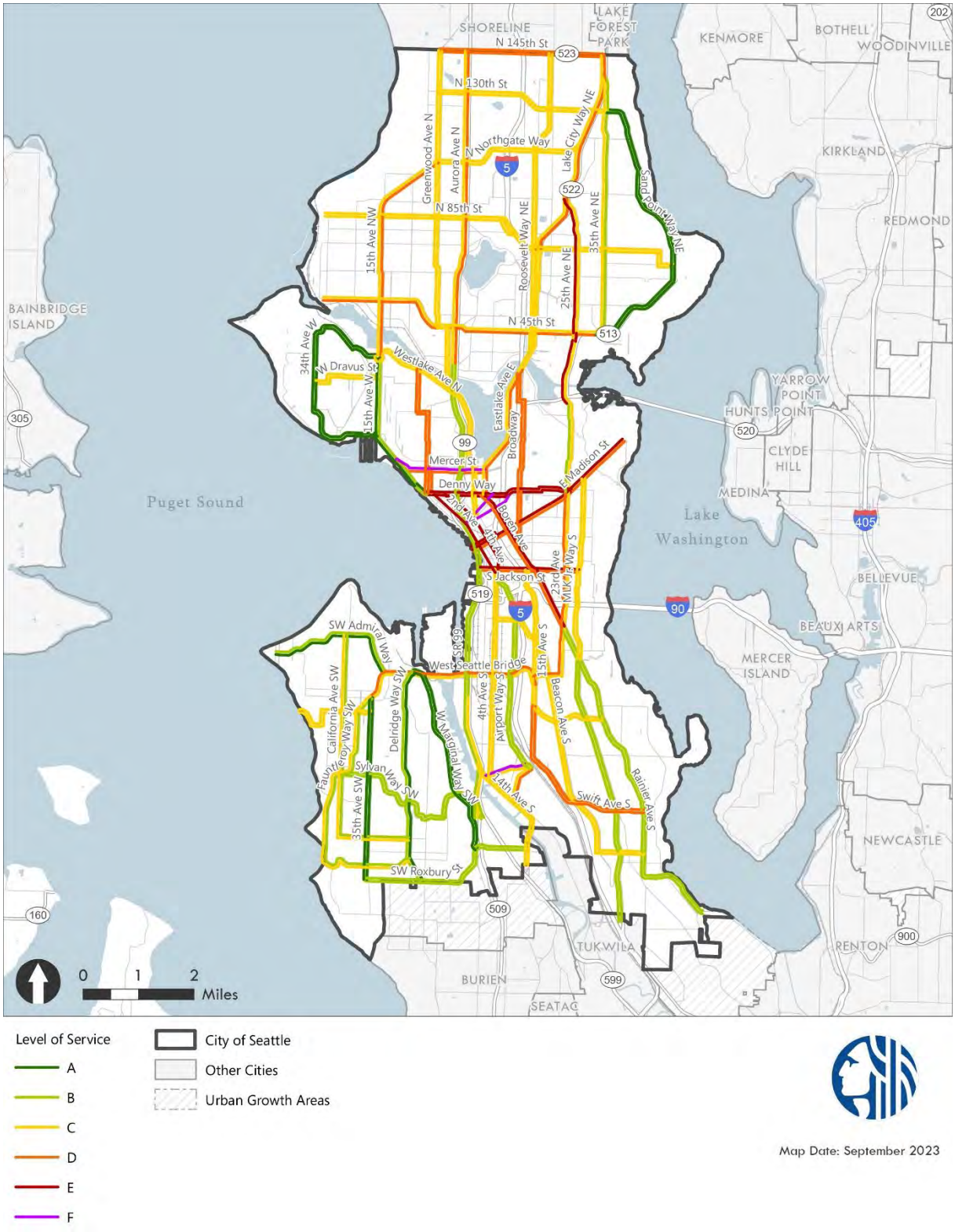
		Alternative 1, No Action Minutes / Level of Service		Alternative 5 Minutes / Level of Service	
Roadway	Extents	N/E	S/W	N/E	S/W
N 145th St	Greenwood Ave N to Lake City Way NE	10.5 / D	9.5 / C	10.5 / D	10 / D
N 130th St	Greenwood Ave N to 35th Ave NE	11.5 / C	12 / C	12 / C	12.5 / C
N Northgate Way	Greenwood Ave N to Lake City Way NE	10.5 / C	11 / C	11 / C	11 / C
N 85th St	32nd Ave NW to Sand Point Way NE	25 / C	24.5 / C	25 / C	25 / C
N 45th St	32nd Ave NW to Union Bay Pl NE	24.5 / C	23.5 / C	25 / D	24.5 / C
15th Ave NW	W Emerson St to N 105th St	17 / D	11.5 / B	17.5 / D	12 / C
Greenwood Ave N	Nickerson St to N 145th St	27 / C	25 / C	27.5 / C	26 / C
Aurora Ave N	N 38th St to N 145th St	19 / D	16.5 / C	19 / D	17 / C
Roosevelt Way NE	Fuhrman Ave E to N 145th St	23 / C	21.5 / C	23 / C	22.5 / C
Lake City Way NE	NE 75th St to N 145th St	14 / D	11 / C	14 / D	11 / C
25th Ave NE	E Roanoke St to Lake City Way NE	15 / C	22.5 / E	15.5 / C	23.5 / E
35th Ave NE	Union Bay Pl NE to Lake City Way NE	16.5 / B	17.5 / C	16.5 / B	18.5 / C
Sand Point Way NE	Union Bay Pl NE to 35th Ave NE	12.5 / A	12 / A	12.5 / A	12.5 / A
34th Ave W	15th Ave W to15th Ave W	11.5 / A	12 / A	11.5 / A	12 / A
W Dravus St	34th Ave W to15th Ave W	5 / C	4.5 / C	5 / C	4.5 / C
15th Ave W	Queen Anne Ave N to W Emerson St	8.5 / B	8 / A	9 / B	8 / A
Queen Anne Ave N	Denny Way to Nickerson St	12.5 / D	12 / D	12.5 / D	12.5 / D
SR 99	S Nevada St to N 38th St	11.5 / B	12.5 / B	12 / B	12.5 / B
Westlake Ave N	Stewart St to W Emerson St	16 / C	18 / C	16.5 / C	18.5 / C
Eastlake Ave E	Denny Way to Fuhrman Ave E	12 / D	11.5 / C	12 / D	11.5 / C
Broadway	Boren Ave to Eastlake Ave E	18 / D	18.5 / D	19 / D	19 / D

Roadway	Extents	Alternative 1, No Action Minutes / Level of Service		Alternative 5 Minutes / Level of Service	
		N/E	S/W	N/E	S/W
23rd Ave	E Madison St to E Roanoke St	6 / C	5 / B	6 / C	5.5 / B
Mercer St	Elliott Ave W to Fairview Ave N	8 / D	14 / F	8 / D	14 / F
Denny Way	Queen Anne Ave N to E Madison St	17.5 / E	16.5 / E	17.5 / E	16.5 / E
2nd Ave	4th Ave S to Denny Way	- / -	12 / E	- / -	12 / E
4th Ave	S Jackson St to Denny Way	10 / E	- / -	10 / E	- / -
Stewart St	1st Ave to Denny Way	- / -	6.5 / F	- / -	6.5 / F
Olive Way	**4th Ave to Denny Way**	7 / F	- / -	**7.5 / F**	- / -
E Madison St	Alaskan Way S to McGilvra Blvd E	20 / D	20 / E	21 / D	20.5 / E
Boren Ave	23rd Ave S to Denny Way	18 / E	15.5 / D	18.5 / E	16 / D
S Jackson St	Alaskan Way S to MLK Jr. Way S	8.5 / D	11 / E	9 / D	11 / E
23rd Ave	15th Ave S to E Madison St	16.5 / C	17.5 / C	17 / C	18 / D
MLK Jr. Way S	Rainier Ave S to E Madison St	11.5 / B	12 / C	12 / C	12 / C
4th Ave S	E Marginal Way S to S Jackson St	13.5 / C	11.5 / C	13.5 / C	11.5 / C
Airport Way S	S Albro Pl to 4th Ave S	10.5 / B	10 / B	10.5 / B	10 / B
15th Ave S	S Jackson St to Rainier Ave S	15 / C	16.5 / C	15.5 / C	17 / C
E Marginal Way S	S Holden St to S Nevada St	5.5 / C	5 / B	5.5 / C	5 / B
Swift Ave S	Rainier Ave S to S Columbian Way	14 / C	14 / C	15 / D	15 / D
Beacon Ave S	Rainier Ave S to 4th Ave S	22 / C	24.5 / C	22.5 / C	25.5 / C
MLK Jr. Way S	S Boeing Access Rd to Rainier Ave S	16.5 / B	16.5 / B	17 / B	16.5 / B
Rainier Ave S	Cornell Ave S to 23rd Ave S	18.5 / A	20.5 / B	19 / B	21 / B
S Michigan St	E Marginal Way S to Airport Way S	3.5 / C	4.5 / F	3.5 / C	4.5 / F
Ellis Ave S	E Marginal Way S to Airport Way S	3 / D	3.5 / C	3 / D	3.5 / C

Roadway	Extents	Alternative 1, No Action Minutes / Level of Service		Alternative 5 Minutes / Level of Service	
		N/E	S/W	N/E	S/W
14th Ave S	S Director St to 1st Ave S	7.5 / C	7 / C	7.5 / C	7 / C
California Ave SW/SW Thistle St	Delridge Way SW to SW Admiral Way	17 / B	17.5 / B	17.5 / B	18 / C
Fauntleroy Way SW/SW Barton St	Delridge Way SW to 35th Ave SW	15.5 / B	18 / C	16 / B	18 / C
35th Ave SW	SW Roxbury St to Fauntleroy Way SW	8.5 / A	9 / A	9 / A	9.5 / A
Delridge Way SW	SW Roxbury St to W Marginal Way SW	11.5 / A	13.5 / B	11.5 / A	13.5 / B
W Marginal Way SW	S Cloverdale St to Delridge Way SW	7.5 / A	8.5 / A	8 / A	8.5 / A
SW Admiral Way	63rd Ave SW to SW Manning St	6.5 / A	7 / A	6.5 / A	7.5 / B
West Seattle Bridge	35th Ave SW to 15th Ave S	8.5 / C	10 / D	9 / C	11 / D
SW Alaska St	Beach Dr SW to 35th Ave SW	7 / C	7.5 / C	7 / C	7.5 / C
Sylvan Way SW	California Ave SW to S Holden St	12 / B	11 / B	12 / B	11.5 / B
SW Roxbury St	35th Ave SW to 14th Ave S	11.5 / B	10.5 / B	11.5 / B	11.5 / B

Note: Impacted corridors are shown in bold.
Source: Fehr & Peers, 2023.

Exhibit 3.10-67. Alternative 5 PM Peak Hour Travel Time Corridor LOS



Source: Fehr & Peers, 2023.

Screenlines

Exhibit 3.10-68 summarizes PM peak hour screenline V/C ratios for 2044 Alternative 1 and 2044 Alternative 5. The volume forecasts in Alternative 5 are approximately seven percent higher than the Alternative 1 forecasts across all locations. Among the action alternatives, overall volumes would be highest under Alternative 5. There are seven screenlines with V/C ratios higher than 0.90, compared with six in Alternative 1. The screenlines are:

- Ship Canal—Ballard Bridge
- Ship Canal—Fremont Bridge
- Ship Canal—Aurora Ave N
- Duwamish River—1st Ave S and 16th Ave S
- Ship Canal—University and Montlake Bridges
- East of 9th Avenue
- South City Limit—M L King Jr Wy to Rainier Ave S (Alternative 5 only)

While Alternative 5 would cause V/C ratios to increase across many screenlines, none are expected to exceed the established thresholds. Therefore, no significant impacts to screenlines are expected under Alternative 5.

Exhibit 3.10-68. PM Peak Hour Screenline Volume-to-Capacity Ratio—Alternative 5

Screenline	Location	Extents	V/C Threshold	Alternative 1, No Action		Alternative 5	
				N/E	S/W	N/E	S/W
1.11	North City Limit	3rd Ave NW to Aurora Ave N	1.20	0.75	0.65	0.75	0.72
1.12	North City Limit	Meridian Ave N to 15th Ave NE	1.20	0.48	0.39	0.46	0.47
1.13	North City Limit	30th Ave NE to Lake City Way NE	1.20	0.85	0.62	0.83	0.67
2.00	Magnolia	Magnolia Bridge to W Emerson Place	1.00	0.58	0.61	0.61	0.68
3.11	Duwamish River	West Seattle Bridge & Spokane St	1.20	0.72	0.81	0.74	0.88
3.12	Duwamish River	1st Ave S & 16th Ave S	1.20	0.69	0.91	0.71	0.96
4.11	South City Limit	Martin Luther King Jr. Way to Rainier Ave S	1.00	0.83	0.87	0.92	0.92
4.12	South City Limit	Marine Dr SW to Meyers Way S	1.00	0.44	0.49	0.49	0.51
4.13	South City Limit	SR 99 to Airport Way S	1.00	0.63	0.47	0.68	0.47
5.11	Ship Canal	Ballard Bridge	1.20	1.01	0.90	1.07	0.96
5.12	Ship Canal	Fremont Bridge	1.20	1.00	1.03	1.12	1.13
5.13	Ship Canal	Aurora Ave Bridge	1.20	0.96	0.70	1.01	0.74
5.16	Ship Canal	University & Montlake Bridges	1.20	0.74	0.94	0.82	1.03
6.11	South of NW 80th St	Seaview Ave NW to 15th Ave NW	1.00	0.40	0.52	0.42	0.54
6.12	South of N W 80th St	8th Ave NW to Greenwood Ave N	1.00	0.60	0.62	0.62	0.66
6.13	South of NE 80th St	Linden Ave N to 1st Ave NE	1.00	0.51	0.59	0.53	0.62
6.14	South of NE 80th St	5th Ave NE to 15th Ave NE	1.00	0.65	0.69	0.73	0.76
6.15	South of NE 80th St	20th Ave NE to Sand Point Way NE	1.00	0.41	0.39	0.47	0.45
7.11	West of Aurora Ave	Fremont Pl N to N 65th St	1.00	0.64	0.63	0.68	0.68
7.12	West of Aurora Ave	N 80th St to N 145th St	1.00	0.44	0.45	0.48	0.50
8.00	South of Lake Union	Valley St to Denny Way	1.20	0.50	0.35	0.53	0.39

Screenline	Location	Extents	V/C Threshold	Alternative 1, No Action		Alternative 5	
				N/E	S/W	N/E	S/W
9.11	South of Spokane St	Beach Dr SW to W Marginal Way SW	1.00	0.51	0.82	0.54	0.88
9.12	South of Spokane St	E Marginal Way S to Airport Way S	1.00	0.65	0.52	0.67	0.54
9.13	South of Spokane St	15th Ave S to Rainier Ave S	1.00	0.69	0.60	0.73	0.67
10.11	South of S Jackson St	Alaskan Way S to 4th Ave S	1.00	0.81	0.82	0.86	0.87
10.12	South of S Jackson St	12th Ave S to Lakeside Ave S	1.00	0.74	0.74	0.81	0.79
12.12	East of CBD	S Jackson St to Howell St	1.20	0.37	0.44	0.39	0.45
13.11	East of I-5	NE Northgate Way to NE 145th St	1.00	0.70	0.53	0.76	0.55
13.12	East of I-5	NE 65th St to NE 80th St	1.00	0.54	0.50	0.61	0.57
13.3	East of I-5	NE Pacific St to NE Ravenna Blvd	1.00	0.61	0.56	0.69	0.60
A1	North of Seneca St	1st Ave to 6th Ave	N/A	0.63	0.65	0.67	0.68
A2	North of Blanchard	Elliott Ave to Westlake Ave	N/A	0.45	0.37	0.48	0.39
A3	East of 9th Ave	Lenora St to Pike St	N/A	0.46	0.94	0.46	0.95
A4	South of Mercer St	Elliott Ave W to Aurora Ave N	N/A	0.55	0.59	0.59	0.62
A5	East of 5th Ave N	Denny Way to Valley St	N/A	0.41	0.37	0.42	0.41
A6	North of Pine St	Melrose Ave E to 15th Ave E	N/A	0.41	0.42	0.43	0.44
A7	North of James St– E Cherry St	Boren Ave to 14th Ave	N/A	0.56	0.39	0.58	0.41
A8	West of Broadway	Yesler Way to E Roy St	N/A	0.55	0.46	0.59	0.48
A9	South of NE 45th St	7th Ave NE to Montlake Blvd NE	N/A	0.54	0.60	0.59	0.64
A10	East of 15th Ave NE	NE 45th St to NE 52nd St	N/A	0.58	0.53	0.64	0.57
A11	South of Northgate Way (N/NE 110th St)	N Northgate Way to Roosevelt Way NE	N/A	0.46	0.54	0.49	0.58
A12	East of 1st Ave NE	NE 100th St to NE Northgate Way	N/A	0.44	0.51	0.47	0.52

Source: Fehr & Peers, 2023.

Intersection LOS—NE 130th / NE 145th Street Subarea

Exhibit 3.10-69 summarizes the LOS and vehicle delay for each study intersection under Alternative 5. Delays would generally be longest under Alternative 5. Under Alternative 5, impacted intersections would include the six intersections identified under the other alternatives as well as the intersection of NE 130th Street/Roosevelt Way NE/5th Avenue NE which would fall from LOS D to LOS E. Impacted intersections include:

- N 145th Street / Aurora Avenue N
- NE 145th Street / 5th Avenue NE
- NE 145th Street / 15th Avenue NE
- N 130th Street / Aurora Avenue N
- N 130th Street / 1st Avenue NE
- NE 130th Street/Roosevelt Way NE/5th Avenue NE
- NE 125th Street / 15th Avenue NE

Exhibit 3.10-69. 130th/145th Street Subarea PM Peak Hour Level of Service—Alternative 5

ID	Intersection	Alternative 1, No Action—Level of Service / Delay (seconds)	Alternative 5—Level of Service / Delay (seconds)
1	NE 155th St / 5th Ave NE	B / 19	B / 20
2	**N 145th St / Aurora Ave N**	**E / 68**	**F / 81**
3	N 145th St / Meridian Ave N	B / 18	C / 21
4	N 145th St / 1st Ave NE	B / 20	C / 27
5	NE 145th St / I-5 On & Off Ramps	A / 9	A / 9
6	**NE 145th St / 5th Ave NE**	**E / 69**	**F / 98**
7	**NE 145th St / 15th Ave NE**	**E / 66**	**F / 89**
8	N 137th St / Meridian Ave N / Roosevelt Way N	A / 7	A / 8
9	**N 130th St / Aurora Ave N**	**E / 79**	**F / 97**
10	N 130th St / Meridian Ave N	B / 13	C / 31
11	**N 130th St / 1st Ave NE**	**E / 71**	**F / 121**
12	NE 130th St / I-5 On Ramp	A / 2	A / 2
13	**NE 130th St / Roosevelt Way NE / 5th Ave NE**	D / 38	**E / 56**
14	Roosevelt Way NE / NE 125th St / 10th Ave NE	B / 17	C / 21
15	**NE 125th St / 15th Ave NE**	**E / 60**	**F / 83**

Note: Impacted intersections are shown in bold.
Source: Fehr & Peers, 2023.

State Facilities

Exhibit 3.10-70 shows a comparison of Alternative 5 forecasted volume to the maximum service volume ~~ratios for Alternative 1 and Alternative 5~~needed to maintain the LOS standard at each of the identified state facility study locations. Alternative 3 ~~V~~volumes at all locations are expected to remain similar or increase relative to Alternative 1 and to the other action alternatives as the assumed growth under Alternative 5 is highest among the alternatives. I-5 at the Ship Canal Bridge and north of the West Seattle Bridge, SR 99 at the Aurora Bridge, SR 509 at the 1st Avenue Bridge, and SR 522 south of NE 145th Street are forecasted to have demand more than 20% over the maximum service volume, indicating substantial vehicle congestion for some hours of the day. Again, the same seven study locations projected to exceed the WSDOT LOS standard under Alternative 1 would do so under Alternative 5. At six of those locations, the ratio is projected to increase by at least 0.01, constituting a significant impact under Alternative 5:

- I-5 at the Ship Canal Bridge
- I-5 north of the West Seattle Bridge
- SR 99 north of N Northgate Way
- SR 99 at the Aurora Avenue Bridge
- SR 509 at the 1st Avenue S Bridge
- SR 522 south of NE 145th Street

One study location is expected to exceed the WSDOT LOS standard, but would have volumes roughly equivalent to Alternative 1, and therefore is not considered to be a significant impact under Alternative 5:

- I-5 north of NE Northgate Way

Because Alternative 5 would cause volumes to increase on multiple state facilities already expected to exceed WSDOT's LOS D standard under Alternative 1, a significant impact to state facilities is expected under Alternative 5.

Exhibit 3.10-70. ~~PM Peak Hour~~Daily State Facilities Level of Service—Alternative 5

Facility	Extents	WSDOT LOS Standard	Alternative 1, No Action—Volume to Maximum Service Volume Ratio	Alternative 5—Volume to Maximum Service Volume Ratio
I-5	North of NE Northgate Way	D	1.03	1.03
I-5	**Ship Canal Bridge**	D	~~1.32~~>1.20	**>1.20**~~1.35~~
I-5	**North of West Seattle Bridge**	D	>1.20~~1.32~~	**>1.20**~~1.33~~
I-5	North of Boeing Access Rd Ramp	D	0.98	0.99
I-90	Mt Baker Tunnel	D	0.97	0.99
SR 99	**North of N Northgate Way**	D	1.08	**1.14**
SR 99	**Aurora Ave Bridge**	D	>1.20~~1.30~~	**>1.20**~~1.37~~

Facility	Extents	WSDOT LOS Standard	Alternative 1, No Action—Volume to Maximum Service Volume Ratio	Alternative 5—Volume to Maximum Service Volume Ratio
SR 99	Tunnel	D	0.65	0.68
SR 99	North of West Seattle Bridge	D	0.76	0.78
SR 99	South of S Cloverdale St	E (mitigated)	0.41	0.44
SR 509	**1st Ave S Bridge**	D	>1.20~~1.25~~	**>1.20**~~1.29~~
SR 519	S Atlantic St West of I-90 Ramps	D	0.83	0.86
SR 520	Lake Washington Bridge	D	0.86	0.88
SR 522	**South of NE 145th St**	D	1.15	**>1.20**~~1.21~~

Note: Impacted locations are shown in bold.
A ratio of >1.2 indicates a demand of more than 20% over the maximum service volume, indicating substantial vehicle congestion for some hours of the day. The WSDOT standard is equivalent to a 1.0 (the denominator is the maximum volume at which LOS D can be maintained).
Source: Fehr & Peers, 2023.

Sensitivity Test

As noted earlier, the regionwide transit forecasts projected by PSRC's activity-based model are higher than the previous trip-based regional model. A sensitivity test was performed to understand how the impacts to certain transit and vehicle metrics might change if the transit forecasts were more closely aligned with the previous iteration of the regional model. This test assumes that transit trips would at most double from existing conditions to future conditions. For King County and regionwide, this would reduce transit trips in Alternative 5 (the highest growth action alternative) by 30% and if all those trips were to shift to vehicular modes, automobile trips would increase by 3 to 4%. For the sensitivity test, the transit trips were reduced by 30% for Alternatives 1 and 5 and the SOV and HOV trips were increased proportionally to maintain the same total number of trips. For metrics that do not have a direct relationship with the number of transit trips, the number of vehicle trips was increased by 5%.

Exhibit 3.10-71 summarizes the SOV mode share expected under the adjusted Alternative 1 and Alternative 5. The SoundCast model predicts that Alternative 5 SOV mode shares will be essentially the same as Alternative 1. Although the Duwamish subarea and West Seattle subarea would exceed their targets, the difference in mode share relative to adjusted Alternative 1 is expected to be less than the 1% impact threshold. Therefore, no SOV mode share impact is expected under the adjusted Alternative 5.

Exhibit 3.10-71. PM Peak Hour SOV Mode Share—Alternative 5 Sensitivity Test

Subarea	SOV Target	Alternative 1, No Action—Adjusted SOV Share	Alternative 5—Adjusted SOV Share
(1) Northwest Seattle	37%	35%	35%
(2) Northeast Seattle	35%	28%	28%
(3) Queen Anne/Magnolia	38%	35%	35%
(4) Downtown/Lake Union	18%	12%	12%
(5) Capitol Hill/Central District	28%	27%	28%
(6) West Seattle	35%	37%	36%
(7) Duwamish	51%	68%	68%
(8) Southeast Seattle	38%	32%	32%

Source: Fehr & Peers, 2023.

Exhibit 3.10-72 shows the trips by mode for the City of Seattle for Alternative 1 and Alternative 5 assuming a 30% reduction in transit trips for each scenario.

Exhibit 3.10-72. Daily Person Trips by Mode—Alternative 5 Sensitivity Test

Mode	Alternative 1—SoundCast	Alternative 1—Adjusted	Alternative 5—SoundCast	Alternative 5—Adjusted
SOV	1,783,000	1,972,000	1,908,000	2,104,000
HOV	1,440,000	1,592,000	1,537,000	1,694,000
Transit	1,138,000	797,000	1,178,000	825,000
Walk	1,378,000	1,378,000	1,453,000	1,453,000
Bike	99,000	99,000	105,000	105,000
Total	**5,838,000**	**5,838,000**	**6,181,000**	**6,181,000**

Source: Fehr & Peers, 2023.

Assuming a 30% reduction in transit loading, **Exhibit 3.10-73** summarizes the projected load factors on the busiest segment of each route in the peak direction of travel. Under the SoundCast results, Alternative 1 had eight impacted routes; with a reduction in ridership, the number of impacted routes would be four. Notably, the light rail lines would not be projected to be over capacity. Compared to Alternative 1, the Alternative 5 adjusted results indicate three routes would be impacted, slightly fewer than is projected using the unadjusted SoundCast results.

Exhibit 3.10-73. PM Peak Hour Average Passenger Load Factors—Sensitivity Test

Transit Route	Maximum Passenger Load Factor in Peak Direction	
	Alternative 1, No Action—Adjusted	Alternative 5—Adjusted
Link light rail—1 Line	0.76	0.74
Link light rail—2 Line	0.90	0.93
Link light rail—3 Line	0.91	0.85
RapidRide C Line—Westwood Village to Alaska Junction	0.50	0.63
RapidRide E Line—Downtown to Aurora Village	**1.33**	**1.40**
RapidRide G Line—Downtown to Madison Valley	0.24	0.27
RapidRide H Line—Alki to Burien	0.54	0.59
RapidRide J Line—Downtown to University District	**1.38**	**1.87**
RapidRide R Line—Downtown to Rainier Valley	0.75	0.83
RapidRide 23rd	0.33	0.34
RapidRide 65th (replaces Route 62)	0.57	0.68
RapidRide Beacon	0.35	0.41
RapidRide Denny	**1.98**	1.77
RapidRide Fremont (replaces Route 40)	**1.05**	**1.17**
RapidRide Green Lake	0.33	0.29
RapidRide Market	0.53	0.54

Source: Fehr & Peers, 2023.

Exhibit 3.10-74 summarizes VMT, VHT and average trip speed under the revised alternatives assuming a 5% increase in vehicle trips. Because the VMT per capita under Alternative 5 would not exceed the level under Alternative 1, no impact to VMT per capita is identified under Alternative 5.

Exhibit 3.10-74. Daily VMT, VHT, and Average Trip Speed—Alternative 5 Sensitivity Test

Metric	Alternative 1, No Action		Alternative 5	
	Total	Per Capita	Total	Per Capita
VMT	25,575,000	14.4	26,378,200	14.1
VHT	909,100	0.5	951100	0.5
Average Trip Speed	28.1	-	27.7	-

Source: Fehr & Peers, 2023.

Exhibit 3.10-75 summarizes PM peak hour screenline V/C ratios for adjusted Alternative 1 and Alternative 5, assuming a 5% increase in volumes. While the V/C ratios would increase, some to very near the thresholds, all screenlines would still be expected to fall within their threshold under both Alternative 1 and Alternative 5. In other words, the comparative impact conclusion would remain the same between the unadjusted and adjusted results.

Exhibit 3.10-75. PM Peak Hour Screenline Volume-to-Capacity Ratio—Alternative 5 Sensitivity Test

Screenline	Location	Extents	V/C Threshold	Alternative 1, No Action		Alternative 5	
				N/E	S/W	N/E	S/W
1.11	North City Limit	3rd Ave NW to Aurora Ave N	1.20	0.79	0.68	0.79	0.76
1.12	North City Limit	Meridian Ave N to 15th Ave NE	1.20	0.50	0.41	0.48	0.49
1.13	North City Limit	30th Ave NE to Lake City Way NE	1.20	0.89	0.65	0.87	0.70
2.00	Magnolia	Magnolia Bridge to W Emerson Place	1.00	0.61	0.64	0.64	0.71
3.11	Duwamish River	West Seattle Bridge & Spokane St	1.20	0.76	0.85	0.78	0.92
3.12	Duwamish River	1st Ave S & 16th Ave S	1.20	0.72	0.96	0.75	1.01
4.11	South City Limit	Martin Luther King Jr. Way to Rainier Ave S	1.00	0.87	0.91	0.97	0.97
4.12	South City Limit	Marine Dr SW to Meyers Way S	1.00	0.46	0.51	0.51	0.54
4.13	South City Limit	SR 99 to Airport Way S	1.00	0.66	0.49	0.71	0.49
5.11	Ship Canal	Ballard Bridge	1.20	1.06	0.95	1.12	1.01
5.12	Ship Canal	Fremont Bridge	1.20	1.05	1.08	1.18	1.19
5.13	Ship Canal	Aurora Bridge	1.20	1.01	0.74	1.06	0.78
5.16	Ship Canal	University & Montlake Bridges	1.20	0.78	0.99	0.86	1.08
6.11	South of NW 80th St	Seaview Ave NW to 15th Ave NW	1.00	0.42	0.55	0.44	0.57
6.12	South of N W 80th St	8th Ave NW to Greenwood Ave N	1.00	0.63	0.65	0.65	0.69
6.13	South of NE 80th St	Linden Ave N to 1st Ave NE	1.00	0.54	0.62	0.56	0.65
6.14	South of NE 80th St	5th Ave NE to 15th Ave NE	1.00	0.68	0.72	0.77	0.80
6.15	South of NE 80th St	20th Ave NE to Sand Point Way NE	1.00	0.43	0.41	0.49	0.47
7.11	West of Aurora Ave	Fremont Pl N to N 65th St	1.00	0.67	0.66	0.71	0.71
7.12	West of Aurora Ave	N 80th St to N 145th St	1.00	0.46	0.47	0.50	0.53
8.00	South of Lake Union	Valley St to Denny Way	1.20	0.53	0.37	0.56	0.41
9.11	South of Spokane St	Beach Dr SW to W Marginal Way SW	1.00	0.54	0.86	0.57	0.92

Screenline	Location	Extents	V/C Threshold	Alternative 1, No Action		Alternative 5	
				N/E	S/W	N/E	S/W
9.12	South of Spokane St	E Marginal Way S to Airport Way S	1.00	0.68	0.55	0.70	0.57
9.13	South of Spokane St	15th Ave S to Rainier Ave S	1.00	0.72	0.63	0.77	0.70
10.11	South of S Jackson St	Alaskan Way S to 4th Ave S	1.00	0.85	0.86	0.90	0.91
10.12	South of S Jackson St	12th Ave S to Lakeside Ave S	1.00	0.78	0.78	0.85	0.83
12.12	East of CBD	S Jackson St to Howell St	1.20	0.39	0.46	0.41	0.47
13.11	East of I-5	NE Northgate Way to NE 145th St	1.00	0.74	0.56	0.80	0.58
13.12	East of I-5	NE 65th St to NE 80th St	1.00	0.57	0.53	0.64	0.60
13.3	East of I-5	NE Pacific St to NE Ravenna Blvd	1.00	0.64	0.59	0.72	0.63
A1	North of Seneca St	1st Ave to 6th Ave	N/A	0.66	0.68	0.70	0.71
A2	North of Blanchard	Elliott Ave to Westlake Ave	N/A	0.47	0.39	0.50	0.41
A3	East of 9th Ave	Lenora St to Pike St	N/A	0.48	0.99	0.48	1.00
A4	South of Mercer St	Elliott Ave W to Aurora Ave N	N/A	0.58	0.62	0.62	0.65
A5	East of 5th Ave N	Denny Way to Valley St	N/A	0.43	0.39	0.44	0.43
A6	North of Pine St	Melrose Ave E to 15th Ave E	N/A	0.43	0.44	0.45	0.46
A7	North of James St– E Cherry St	Boren Ave to 14th Ave	N/A	0.59	0.41	0.61	0.43
A8	West of Broadway	Yesler Way to E Roy St	N/A	0.58	0.48	0.62	0.50
A9	South of NE 45th St	7th Ave NE to Montlake Blvd NE	N/A	0.57	0.63	0.62	0.67
A10	East of 15th Ave NE	NE 45th St to NE 52nd St	N/A	0.61	0.56	0.67	0.60
A11	South of Northgate Way (N/NE 110th)St)	N Northgate Way to Roosevelt Way NE	N/A	0.48	0.57	0.51	0.61
A12	East of 1st Ave NE	NE 100th St to NE Northgate Way	N/A	0.46	0.54	0.49	0.55

Source: Fehr & Peers, 2023.

Exhibit 3.10-76 shows a comparison of the adjusted Alternative 5 volumes to the maximum service volume needed to maintain the LOS standard ~~ratios for adjusted Alternative 1 and Alternative 5~~ at each of the identified state facility study locations. Nine study locations are projected to exceed the WSDOT LOS standard under adjusted Alternative 1 and would also do so under adjusted Alternative 5. At all of these locations, the ratio is projected to increase by at least 0.01, constituting a significant impact under adjusted Alternative 5. This is three more impacts than were identified under the unadjusted Alternative 5.

Exhibit 3.10-76. ~~PM Peak Hour~~Daily State Facilities Level of Service—Alternative 5 Sensitivity Test

Facility	Extents	WSDOT LOS Standard	Alternative 1, No Action– Volume to Maximum Service Volume Ratio	Alternative 5–Volume to Maximum Service Volume Ratio
I-5	North of NE Northgate Way	D	1.08	**1.09**
I-5	**Ship Canal Bridge**	D	>1.20~~1.39~~	**>1.20**~~1.42~~
I-5	**North of West Seattle Bridge**	D	>1.20~~1.38~~	**>1.20**~~1.39~~
I-5	North of Boeing Access Rd Ramp	D	1.03	**1.04**
I-90	Mt Baker Tunnel	D	1.02	**1.04**
SR 99	**North of N Northgate Way**	D	1.13	**1.20**
SR 99	**Aurora Ave Bridge**	D	>1.20~~1.37~~	**>1.20**~~1.44~~
SR 99	Tunnel	D	0.68	0.71
SR 99	North of West Seattle Bridge	D	0.80	0.82
SR 99	South of S Cloverdale St	E (mitigated)	0.43	0.46
SR 509	**1st Ave S Bridge**	D	>1.20~~1.32~~	**>1.20**~~1.35~~
SR 519	S Atlantic St West of I-90 Ramps	D	0.88	0.91
SR 520	Lake Washington Bridge	D	0.90	0.93
SR 522	**South of NE 145th St**	D	1.20	**>1.20**~~1.27~~

Note: Impacted locations are shown in bold.
A ratio of >1.2 indicates a demand of more than 20% over the maximum service volume, indicating substantial vehicle congestion for some hours of the day. The WSDOT standard is equivalent to a 1.0 (the denominator is the maximum volume at which LOS D can be maintained).
Source: Fehr & Peers, 2023.

Summary of Draft EIS Alternative Impacts

Exhibit 3.10-77 summarizes the potential impacts to Seattle's transportation system under each alternative studied in the Draft EIS. The purpose of an EIS is to disclose how potential actions by the City may impact the transportation system in comparison to what is expected to occur with currently adopted zoning codes and policies. Therefore, the impacts of each action alternative ~~is~~ are assessed against the performance of the transportation system under the No Action Alternative. The impacts identified under the No Action Alternative are also expected to occur under the action alternatives even if those alternatives would not result in additional impacts. Although the focus of the EIS is not to mitigate conditions under the currently adopted zoning code (i.e., the No Action Alternative), many of the mitigation measures proposed for the action alternatives would also lessen impacts under the No Action Alternative.

Comparison to the Preferred Alternative

The Draft EIS alternatives were analyzed before the Seattle Transportation Plan (STP) was adopted. Based on the findings of the revised modeling that includes assumptions consistent with the network maps, policy direction, and candidate projects of the STP, it is likely that the Draft EIS alternatives would have slightly more impacts to general purpose vehicles and state facilities with the STP in place. For example, the City may choose to increase the capacity to move people along its right-of-way by reallocating space to transit. A reallocation of general purpose travel lanes would make more efficient use of city streets and help accommodate growth, but could have a secondary impact on auto travel. Therefore, the screenline impacts identified for the Preferred Alternative may also occur with some of the Draft EIS alternatives. This is consistent with Section 3.10.3 in the Draft EIS, which identified that transportation mitigation projects could have secondary impacts.

All action alternatives are expected to have significant impacts to transit passenger load, corridor travel time, intersection LOS in the NE 130th/NE 145th Street Subarea, and state facilities. Impacts of Alternatives 2 and 3 would be similar to one another while impacts of Alternative 5 are expected to be higher in magnitude due to the increased growth. Alternative 4 would fall within this range, likely closer in magnitude to Alternatives 2 and 3 than Alternative 5. **Exhibit 3.10-77** details the types and number of impacts expected under each alternative.

Exhibit 3.10-77. Overview of Significant Adverse Impacts: ~~All~~ Draft EIS Alternatives

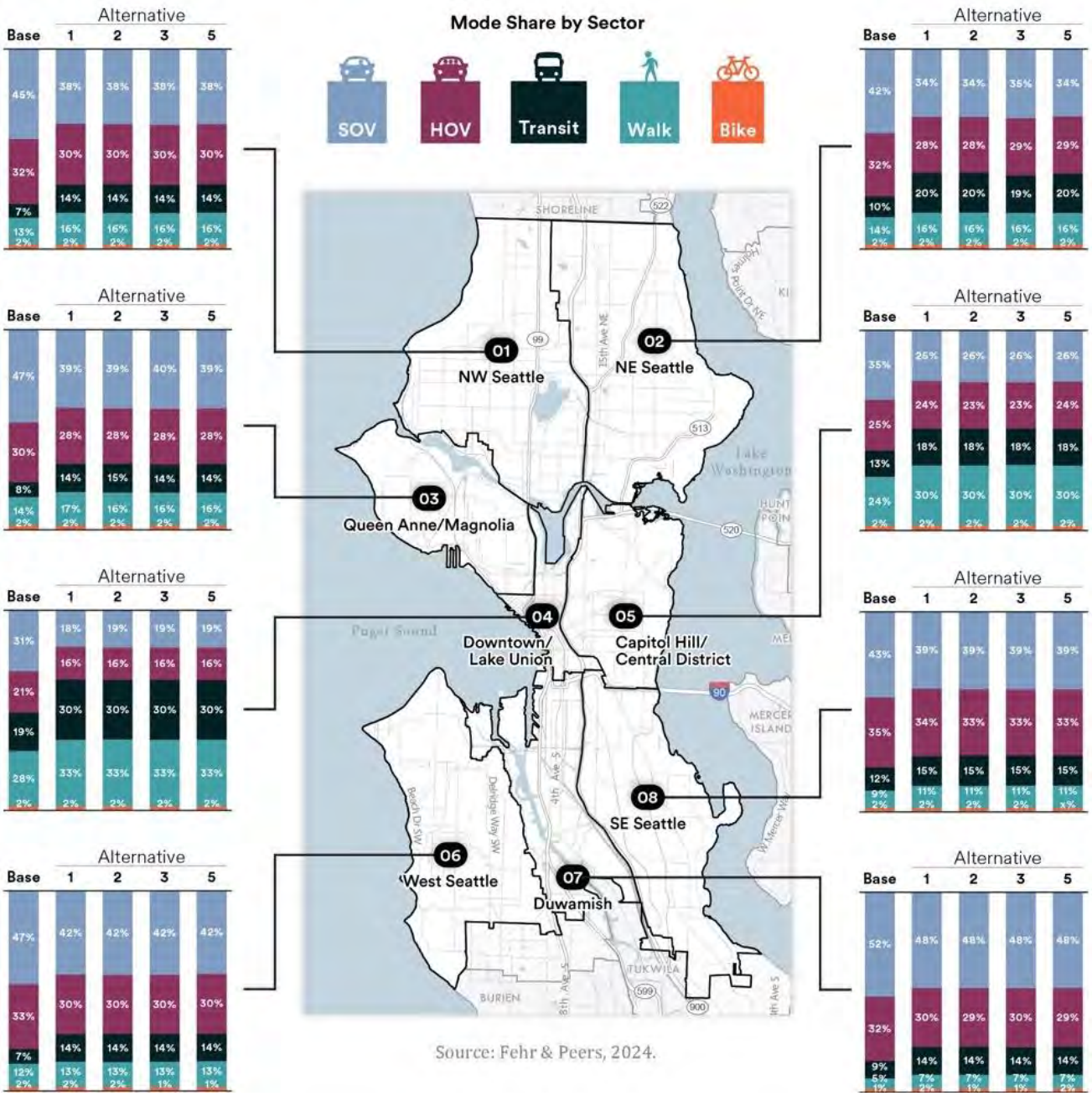
Impact Type	Alt. 1—No Action	Alt. 2—Focused	Alt. 3—Broad	Alt. 5—Combined
SOV Mode Share	Duwamish subarea impacted	No additional impacts beyond No Action	No additional impacts beyond No Action	No additional impacts beyond D No Action
VMT per Capita	No	No	No	No
Active Transportation	No	No	No	No
Transit	8 routes: Light Rail 1, 2, and 3 Lines; RapidRide E, J, R, Denny & Fremont	8 routes under No Action + additional impacts to	8 routes under No Action + additional impacts to	8 routes under No Action + additional impacts to

Impact Type	Alt. 1—No Action	Alt. 2—Focused	Alt. 3—Broad	Alt. 5—Combined
		RapidRide E, J, K & Fremont	RapidRide E, J, K & Fremont	RapidRide E, J, K & Fremont
Roadway Users				
Corridor Travel Time	4 corridors: Mercer, Stewart, Olive & Michigan	4 corridors under No Action + additional impact to Olive	4 corridors under No Action + additional impact to Olive	4 corridors under No Action + additional impact to Olive
Screenline	No	No	No	No
130th/145th Subarea Intersection LOS	6 intersections: 145th/Aurora, 145th/5th, 145th/15th, 130th/Aurora, 130th/1st & 125th/15th	Additional impacts to the 6 intersections impacted under No Action	Additional impacts to the 6 intersections impacted under No Action	Additional impacts to the 6 intersections impacted under No Action + impact at 130th/Roosevelt/5th
State Facilities	7 segments along I-5, SR 99, SR 509 & SR 522	7 segments under No Action + additional impacts along I-5, SR 99, & SR 522	7 segments under No Action + additional impacts along I-5, SR 99, & SR 522	7 segments under No Action + additional impacts along I-5, SR 99, SR 509 & SR 522
Safety	No	No	No	No

Source: Fehr & Peers, 2023.

Exhibit 3.10-78 and **Exhibit 3.6-79** summarizes some of the key metrics across the alternatives graphically.

Exhibit 3.10-78. Transportation Metrics Across the Draft EIS Alternatives



Source: Fehr & Peers, 2024.

Note: Base refers to 2019. All alternatives are studied with 2044 as a horizon year.
Source: Fehr& Peers, 2024.

Exhibit 3.10-79. Citywide Transportation Metrics across the Draft EIS Alternatives



Note: This exhibit was updated since the Draft EIS to reflect revised vehicle miles and hours traveled.
Source: Fehr & Peers, 2023.

Impacts of Preferred Alternative

Note: The impacts analysis for the Preferred Alternative was added since the Draft EIS.

This section evaluates the transportation impacts of the Preferred Alternative which has a similar magnitude of household and employment growth as Alternative 5. Since the Draft EIS was published in March 2024, the City adopted the Seattle Transportation Plan (STP). The SoundCast travel demand model was updated for this Final EIS to reflect the network maps, policy direction, and candidate projects identified in the STP. While the specific project list will be refined over time, the revisions to the model reflect the overarching goals of the STP to make active transportation and transit more convenient choices for Seattle residents and employees. Therefore, the STP candidate projects reflect the reallocation of some general purpose roadway capacity to become dedicated transit (or transit and freight) lanes which provide better speed and reliability for those modes, increase the capacity to move people along a corridor, and accommodate increased growth.

As noted in the Draft EIS, some transportation mitigation projects could have secondary impacts. For example, the City may choose to increase the capacity to move people along its right-of-way by reallocating space to transit. A reallocation of general purpose travel lanes would make more efficient use of city streets and help accommodate growth, but could have a secondary impact on auto travel. These types of secondary effects are apparent in the findings of the Final EIS revised modeling. The revised modeling indicates that it is likely that the Draft EIS alternatives would have slightly more impacts to roadway users and state facilities with the STP network and policy in place. For example, the screenline impacts identified for the Preferred Alternative may also occur with some of the Draft EIS alternatives. As required, the City would prepare additional analysis and take public and stakeholder input into consideration before implementing specific transportation improvement projects, whether they are included in the STP or identified as mitigation for an action alternative. SDOT may choose not to pursue these projects due to potential impacts and future outcomes from community engagement, but they are used as a reasonably likely assumption to assess the proposed land use alternative.

Because the focus of this EIS is the Comprehensive Plan land use proposal, the STP assumptions were incorporated into an updated Alternative 1, No Action, (called “Alternative 1, No Action, with STP” in the tables in the remainder of this section) as well as the Preferred Alternative models. This section uses the updated Alternative 1, No Action, as the baseline for comparison to isolate the effects that can be expected as a result of the Preferred Alternative.

Mode Share

Exhibit 3.10-80 summarizes the SOV mode share expected with the Alternative 1, No Action, and Preferred Alternative. The SoundCast model predicts that the Preferred Alternative SOV mode shares would be very similar to or slightly lower than Alternative 1, No Action. Although the Duwamish sector would exceed its target, the SOV mode share is projected to be slightly

lower with the Preferred Alternative than with Alternative 1, No Action. Therefore, the Preferred Alternative is not expected to cause a significant impact to mode share.

Exhibit 3.10-80. PM Peak Hour SOV Mode Share—Preferred Alternative

Sector	SOV Target	Alternative 1, No Action, with STP SOV Share	Preferred Alternative SOV Share
(1) Northwest Seattle	37%	32%	31%
(2) Northeast Seattle	35%	25%	24%
(3) Queen Anne/Magnolia	38%	32%	32%
(4) Downtown/Lake Union	18%	10%	10%
(5) Capitol Hill/Central District	28%	26%	26%
(6) West Seattle	35%	34%	33%
(7) Duwamish	51%	66%	65%
(8) Southeast Seattle	38%	31%	31%

Note: Existing (2017-2019) mode share data from the PSRC household travel survey have substantial margins of error. See **Exhibit 3.10-10** for margins of error by sector.
Source: Fehr & Peers, 2024.

Exhibit 3.10-81 compares the number of daily person trips expected by mode with 2044 Alternative 1, No Action, and the Preferred Alternative. Citywide, the Preferred Alternative is expected to result in approximately 389,000 additional person trips than Alternative 1, No Action, an increase of 7%. While the total number of trips would increase with the Preferred Alternative, the relative mode shares are expected to be very similar to Alternative 1, No Action.

Exhibit 3.10-81. Daily Person Trips by Mode—Preferred Alternative

Mode	Alternative 1, No Action, with STP	Preferred Alternative
SOV	1,784,000	1,897,000
HOV	1,539,000	1,664,000
Transit	1,148,000	1,209,000
Walk	1,373,000	1,459,000
Bike	106,000	111,000
Total	**5,950,000**	**6,340,000**

Source: Fehr & Peers, 2024.

Transit

Exhibit 3.10-82 summarizes the projected load factors on the busiest segment of each study route in the peak direction of travel with impacts shown in bold. King County Metro continually

tracks ridership by route and trip using their automatic passenger counters allowing them to revise service to adapt to changing demands. This evaluation indicates transit pathways that may have demand in excess of the currently planned service, but in practice King County Metro would regularly adapt service to better meet the highest demand corridors or riders may choose to travel at different times to avoid the most crowded trips, sometimes called "peak spreading." The potentially impacted routes include:

- Link Light Rail – 2 Line
- RapidRide E Line—Downtown to Aurora Village
- RapidRide J Line—Downtown to University District
- RapidRide R Line—Downtown to Rainier Valley
- RapidRide 65th
- RapidRide Denny
- RapidRide Fremont

Exhibit 3.10-82. PM Peak Hour Average Passenger Load Factors—Preferred Alternative

Transit Route	Maximum Passenger Load Factor in Peak Direction	
	Alternative 1, No Action, with STP	Preferred Alternative
Link light rail—1 Line	0.97	0.99
Link light rail—2 Line	1.38	**1.45**
Link light rail—3 Line	1.33	1.37
RapidRide C Line—Westwood Village to Alaska Junction	0.67	0.91
RapidRide E Line—Downtown to Aurora Village	1.98	**2.17**
RapidRide G Line—Downtown to Madison Valley	0.37	0.43
RapidRide H Line—Alki to Burien	0.78	0.78
RapidRide J Line—Downtown to University District	2.03	**2.18**
RapidRide R Line—Downtown to Rainier Valley	1.01	**1.12**
RapidRide 23rd	0.41	0.46
RapidRide 65th (replaces Route 62)	0.93	**1.08**
RapidRide Beacon	0.50	0.51
RapidRide Denny	2.90	**3.11**
RapidRide Fremont (replaces Route 40)	1.66	**1.87**
RapidRide Green Lake	0.47	0.61
RapidRide Market	0.91	0.89

Note: Impacted routes are shown in bold.
Source: Fehr & Peers, 2025.

As noted in the **Sensitivity Test** section, the regionwide transit forecasts projected by PSRC's activity-based model are higher than the previous trip-based regional model. Refer to that section for a sensitivity test to understand how the impacts to certain transit and vehicle metrics may change if the transit forecasts were more closely aligned with the previous iteration of the regional model.

Roadway Users

Results related to roadway users are summarized in the following sections.

VMT / VHT / Average Trip Speed

Exhibit 3.10-83 summarizes VMT, VHT, and average trip speed with the Preferred Alternative relative to Alternative 1, No Action. The Preferred Alternative would result in higher total VMT and VHT because it assumes a higher level of growth than Alternative 1, No Action, and would also result in lower average trip speed at just over 27 mph. Despite the increase in VMT, the VMT per capita would be lower than Alternative 1, No Action, at 13.2 VMT per Seattle resident and employee.

Exhibit 3.10-83. Daily VMT, VHT, and Average Trip Speed—Preferred Alternative

	Alternative 1, No Action, with STP		Preferred Alternative	
Metric	Total	Per Capita	Total	Per Capita
VMT	24,411,300	13.5	25,216,800	13.2
VHT	877,300	0.5	925,000	0.5
Average Trip Speed	27.8	—	27.3	—

Source: Fehr & Peers, 2025.

Because the VMT per capita with the Preferred Alternative would not exceed the level expected with Alternative 1, No Action, the Preferred Alternative is not expected to cause a significant impact to VMT per capita.

Travel Time

Exhibit 3.10-84 summarizes PM peak hour corridor travel times under the Preferred Alternative compared to Alternative 1, No Action.[95] **Exhibit 3.10-85** and **Exhibit 3.10-86** display the LOS values along associated corridors on the map for Alternative 1, No Action, and the Preferred Alternative, respectively. Corridor travel times are expected to increase by up to 2.5 minutes compared to Alternative 1, No Action, and no corridors are expected to have lower travel times than with Alternative 1, No Action. Under Alternative 1, No Action, with the STP

[95] For corridors with peak directional patterns, the AM peak hour would typically reflect similar conditions in the opposite direction from those shown for the PM peak hour.

network in place, 68 corridors (with each direction counted separately) are expected to operate at LOS A-C, 21 at LOS D, 9 corridors at LOS E, and 6 corridors at LOS F. Under the Preferred Alternative, 64 corridors are expected to operate at LOS A-C, 23 at LOS D, 10 corridors at LOS E, and 7 corridors at LOS F.

Based on the thresholds of significance defined for this EIS, the Preferred Alternative is expected to result in significant travel time impacts to three corridors (shown in bold in **Exhibit 3.10-84**):

- Mercer Street between Elliott Avenue West and Fairview Avenue North
- Denny Way between Queen Anne Ave N to E Madison St
- Stewart Street between 1st Avenue and Denny Way

Exhibit 3.10-84. PM Peak Hour Travel Time Corridor Level of Service—Preferred Alternative

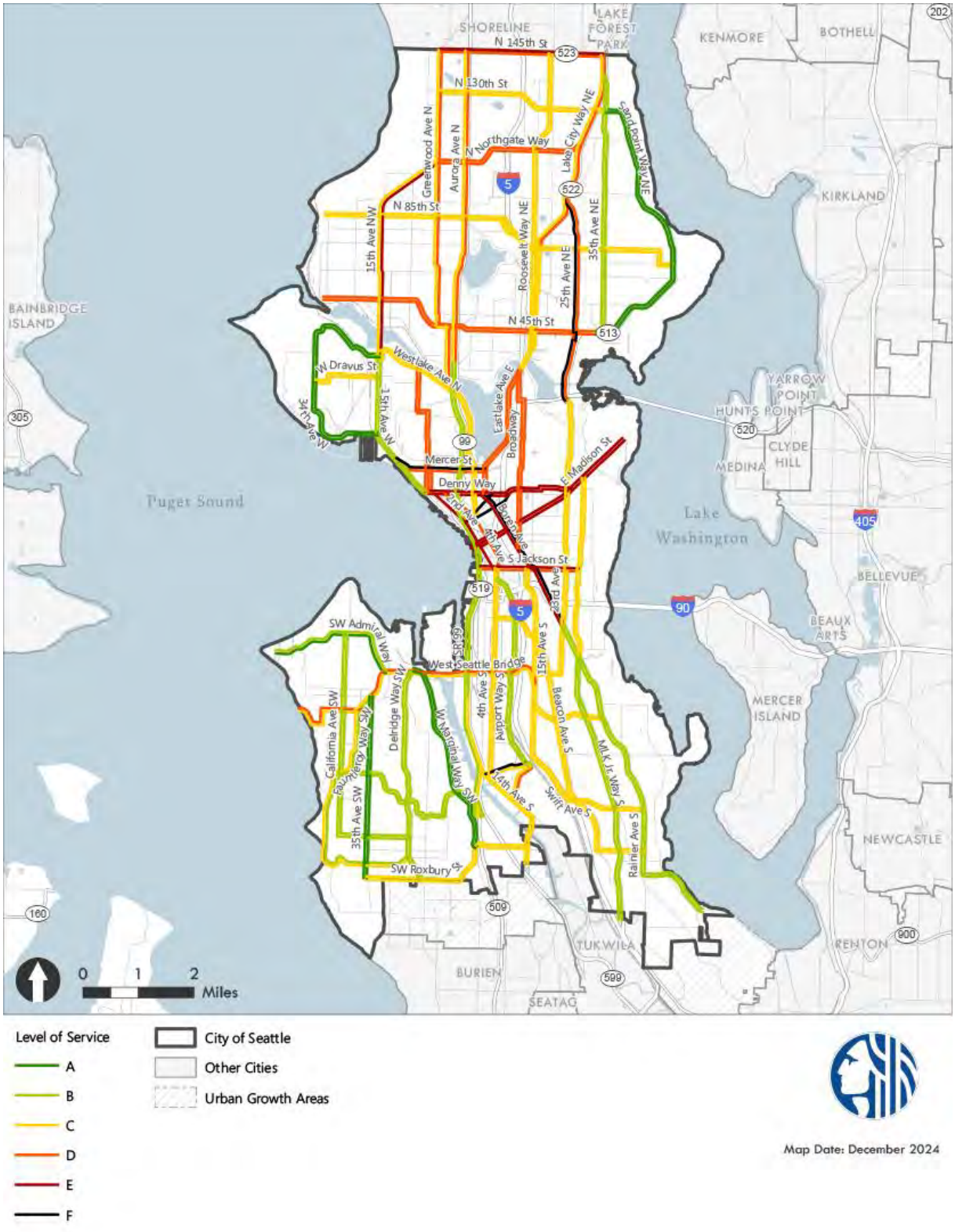
		Alternative 1, No Action, with STP Minutes / Level of Service		Preferred Alternative Minutes / Level of Service	
Roadway	Extents	N/E	S/W	N/E	S/W
N 145th St	Greenwood Ave N to Lake City Way NE	12 / D	12.5 / E	12.5 / E	12.5 / E
N 130th St	Greenwood Ave N to 35th Ave NE	13 / C	14 / C	13.5 / C	14.5 / C
N Northgate Way	Greenwood Ave N to Lake City Way NE	13.5 / D	13.5 / D	14 / D	14 / D
N 85th St	32nd Ave NW to Sand Point Way NE	25.5 / C	26.5 / C	27 / C	27 / C
N 45th St	32nd Ave NW to Union Bay Pl NE	27 / D	26.5 / D	28.5 / D	27.5 / D
15th Ave NW	W Emerson St to N 105th St	20 / E	13 / C	22 / E	13.5 / C
Greenwood Ave N	Nickerson St to N 145th St	31 / D	27 / C	33.5 / D	28 / C
Aurora Ave N	N 38th St to N 145th St	20 / D	16.5 / C	20.5 / D	17 / C
Roosevelt Way NE	Fuhrman Ave E to N 145th St	27 / C	25.5 / C	29.5 / D	26 / C
Lake City Way NE	NE 75th St to N 145th St	15 / D	11.5 / C	15.5 / D	11.5 / C
25th Ave NE	E Roanoke St to Lake City Way NE	19.5 / D	28 / F	22 / D	28.5 / F
35th Ave NE	Union Bay Pl NE to Lake City Way NE	16.5 / B	17 / B	17 / B	18 / C
Sand Point Way NE	Union Bay Pl NE to 35th Ave NE	13.5 / A	13 / A	13.5 / A	13 / A
34th Ave W	15th Ave W to15th Ave W	11.5 / A	12 / A	11.5 / A	12.5 / A
W Dravus St	34th Ave W to15th Ave W	5 / C	4.5 / C	5.5 / C	4.5 / C
15th Ave W	Queen Anne Ave N to W Emerson St	9.5 / B	8.5 / B	10.5 / C	8.5 / B
Queen Anne Ave N	Denny Way to Nickerson St	13.5 / D	12.5 / D	14.5 / D	13 / D
SR 99	S Nevada St to N 38th St	12 / B	12.5 / B	13.5 / C	12.5 / B
Westlake Ave N	Stewart St to W Emerson St	17.5 / C	19.5 / C	18.5 / C	20 / D
Eastlake Ave E	Denny Way to Fuhrman Ave E	12.5 / D	12 / D	13 / D	12 / D
Broadway	Boren Ave to Eastlake Ave E	17.5 / D	17.5 / D	18 / D	17.5 / D

		Alternative 1, No Action, with STP Minutes / Level of Service		Preferred Alternative Minutes / Level of Service	
Roadway	Extents	N/E	S/W	N/E	S/W
23rd Ave	E Madison St to E Roanoke St	7 / C	6 / C	7 / C	6.5 / C
Mercer St	**Elliott Ave W to Fairview Ave N**	9 / D	15 / F	9 / D	**16 / F**
Denny Way	**Queen Anne Ave N to E Madison St**	18.5 / E	17.5 / E	**19.5 / F**	18 / E
2nd Ave	4th Ave S to Denny Way	- / -	12 / E	- / -	12 / E
4th Ave	S Jackson St to Denny Way	9.5 / D	- / -	10 / E	- / -
Stewart St	**1st Ave to Denny Way**	- / -	6 / F	- / -	**6.5 / F**
Olive Way	4th Ave to Denny Way	7.5 / F	- / -	7.5 / F	- / -
E Madison St	Alaskan Way S to McGilvra Blvd E	21.5 / E	21 / E	21.5 / E	21.5 / E
Boren Ave	23rd Ave S to Denny Way	21 / F	17.5 / E	21.5 / F	17.5 / E
S Jackson St	Alaskan Way S to MLK Jr. Way S	9 / D	11.5 / E	9.5 / D	11.5 / E
23rd Ave	15th Ave S to E Madison St	16.5 / C	17.5 / C	17.5 / C	18 / D
MLK Jr. Way S	Rainier Ave S to E Madison St	12 / C	12 / C	12.5 / C	12.5 / C
4th Ave S	E Marginal Way S to S Jackson St	13.5 / C	12 / C	14 / C	12 / C
Airport Way S	S Albro Pl to 4th Ave S	11 / B	10 / B	11 / B	10 / B
15th Ave S	S Jackson St to Rainier Ave S	16.5 / C	17.5 / C	16.5 / C	18 / C
E Marginal Way S	S Holden St to S Nevada St	5.5 / C	5 / B	5.5 / C	5 / B
Swift Ave S	Rainier Ave S to S Columbian Way	14 / C	14.5 / C	14.5 / C	15 / D
Beacon Ave S	Rainier Ave S to 4th Ave S	23 / C	26 / C	23 / C	26.5 / C
MLK Jr. Way S	S Boeing Access Rd to Rainier Ave S	16.5 / B	16.5 / B	17.5 / B	16.5 / B
Rainier Ave S	Cornell Ave S to 23rd Ave S	19.5 / B	21.5 / B	20 / B	22 / B
S Michigan St	E Marginal Way S to Airport Way S	3.5 / C	4.5 / F	3.5 / C	4.5 / F
Ellis Ave S	E Marginal Way S to Airport Way S	3 / D	3.5 / C	3 / D	3.5 / C

Roadway	Extents	Alternative 1, No Action, with STP Minutes / Level of Service		Preferred Alternative Minutes / Level of Service	
		N/E	S/W	N/E	S/W
14th Ave S	S Director St to 1st Ave S	8 / C	7.5 / C	8 / C	8 / C
California Ave SW/SW Thistle St	Delridge Way SW to SW Admiral Way	17.5 / B	17.5 / B	17.5 / B	18 / C
Fauntleroy Way SW/SW Barton St	Delridge Way SW to 35th Ave SW	15.5 / B	18.5 / C	16 / B	18.5 / C
35th Ave SW	SW Roxbury St to Fauntleroy Way SW	9 / A	9.5 / A	9.5 / A	10 / B
Delridge Way SW	SW Roxbury St to W Marginal Way SW	12 / B	14 / B	12 / B	14.5 / C
W Marginal Way SW	S Cloverdale St to Delridge Way SW	8 / A	8.5 / A	8.5 / A	8.5 / A
SW Admiral Way	63rd Ave SW to SW Manning St	7 / A	8.5 / B	7 / A	9 / C
West Seattle Bridge	35th Ave SW to 15th Ave S	8.5 / C	11 / D	9 / C	12 / D
SW Alaska St	Beach Dr SW to 35th Ave SW	7 / C	8 / D	7 / C	8 / D
Sylvan Way SW	California Ave SW to S Holden St	12.5 / B	11.5 / B	12.5 / B	12.5 / B
SW Roxbury St	35th Ave SW to 14th Ave S	12.5 / C	12 / C	13 / C	13 / C

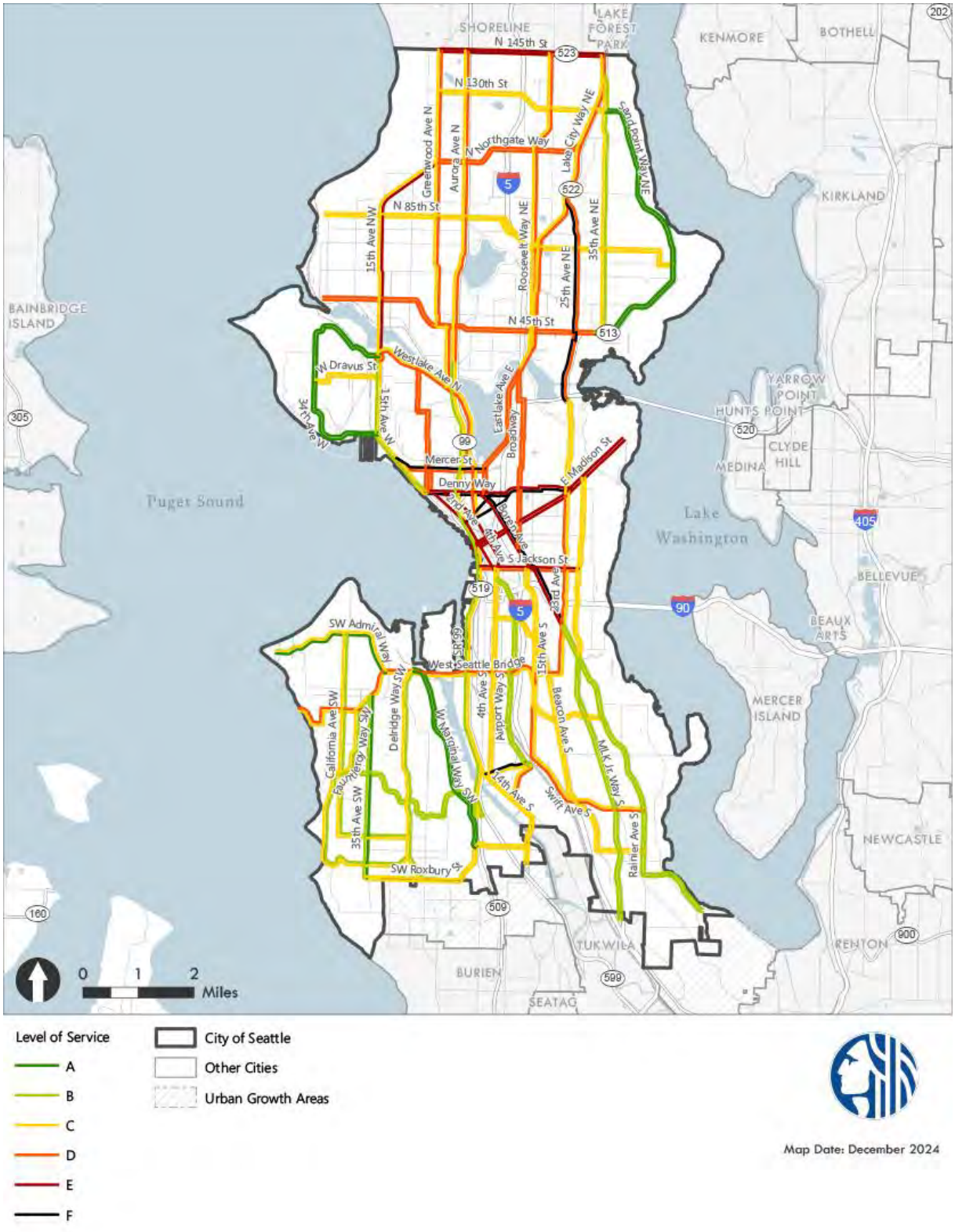
Note: Impacted corridors are shown in bold.
Source: Fehr & Peers, 2025.

Exhibit 3.10-85. Alternative 1, No Action, with STP—Travel Time Corridor LOS



Source: Fehr & Peers, 2025.

Exhibit 3.10-86. Preferred Alternative—Travel Time Corridor LOS



Source: Fehr & Peers, 2025.

Screenlines

Exhibit 3.10-87 summarizes PM peak hour screenline V/C ratios for 2044 Alternative 1, No Action, and the Preferred Alternative. Across all screenlines combined, the volume forecasts are approximately four percent higher with the Preferred Alternative than the Alternative 1, No Action. There are nine screenlines with V/C ratios higher than 0.90, compared with seven in Alternative 1, No Action. The screenlines exceeding 0.90 are:

- North City Limit – 30th Ave NE to Lake City Way NE
- South City Limit – Martin Luther King Jr Way to Rainier Ave S (Preferred Alternative only)
- Ship Canal – Ballard Bridge
- Ship Canal – Fremont Bridge
- Ship Canal – Aurora Ave N Bridge
- Ship Canal – University and Montlake Bridges
- South of Spokane St – Beach Dr SW to W Marginal Way SW (Preferred Alternative only)
- East of I-5 – NE Northgate Way to NE 145th St
- East of 9th Avenue

The screenline east of I-5 is expected to exceed the City's V/C threshold with both Alternative 1, No Action, and the Preferred Alternative, but does not constitute a significant impact because the change in volume would not meet the 0.01 V/C increase threshold of significance. Two of the screenlines are expected to exceed the established thresholds with both Alternative 1, No Action, and the Preferred Alternative and the increase relative to Alternative 1, No Action, would be more than the 0.01 threshold of significance:

- Ship Canal – Fremont Bridge
- Ship Canal – University and Montlake Bridges

Therefore, two significant impacts to screenlines are expected with the Preferred Alternative. These results indicate that the demand to cross the Ship Canal by general purpose vehicles would exceed the capacity of these three bridges. In addition to some demand shifting to the Ballard and Aurora Avenue bridges as shown in **Exhibit 3.10-87**, the model indicates that demand on I-5 over the Ship Canal would increase. See the State Facilities section for results.

Exhibit 3.10-87. PM Peak Hour Screenline Volume-to-Capacity Ratio—Preferred Alternative

Screenline	Location	Extents	V/C Threshold	Alternative 1, No Action, with STP		Preferred Alternative	
				N/E	S/W	N/E	S/W
1.11	North City Limit	3rd Ave NW to Aurora Ave N	1.20	0.89	0.78	0.88	0.83
1.12	North City Limit	Meridian Ave N to 15th Ave NE	1.20	0.59	0.49	0.58	0.54
1.13	North City Limit	30th Ave NE to Lake City Way NE	1.20	0.93	0.70	0.93	0.73
2.00	Magnolia	Magnolia Bridge to W Emerson Place	1.00	0.58	0.62	0.64	0.70
3.11	Duwamish River	West Seattle Bridge & Spokane St	1.20	0.73	0.83	0.75	0.89
3.12	Duwamish River	1st Ave S & 16th Ave S	1.20	0.68	0.85	0.69	0.88
4.11	South City Limit	Martin Luther King Jr. Way to Rainier Ave S	1.00	0.84	0.90	0.90	0.93
4.12	South City Limit	Marine Dr SW to Meyers Way S	1.00	0.47	0.52	0.51	0.53
4.13	South City Limit	SR 99 to Airport Way S	1.00	0.58	0.41	0.62	0.42
5.11	Ship Canal	Ballard Bridge	1.20	1.08	0.95	1.11	0.98
5.12	**Ship Canal**	**Fremont Bridge**	1.20	1.13	>1.20	1.17	**>1.20**
5.13	Ship Canal	Aurora Ave Bridge	1.20	1.03	0.77	1.07	0.77
5.16	**Ship Canal**	**University & Montlake Bridges**	1.20	0.90	>1.20	0.93	**>1.20**
6.11	South of NW 80th St	Seaview Ave NW to 15th Ave NW	1.00	0.40	0.46	0.43	0.47
6.12	South of NW 80th St	8th Ave NW to Greenwood Ave N	1.00	0.63	0.58	0.67	0.60
6.13	South of NE 80th St	Linden Ave N to 1st Ave NE	1.00	0.53	0.62	0.55	0.62
6.14	South of NE 80th St	5th Ave NE to 15th Ave NE	1.00	0.71	0.82	0.77	0.82
6.15	South of NE 80th St	20th Ave NE to Sand Point Way NE	1.00	0.50	0.44	0.55	0.46
7.11	West of Aurora Ave	Fremont Pl N to N 65th St	1.00	0.65	0.66	0.69	0.70
7.12	West of Aurora Ave	N 80th St to N 145th St	1.00	0.73	0.66	0.78	0.70
8.00	South of Lake Union	Valley St to Denny Way	1.20	0.57	0.41	0.59	0.43
9.11	South of Spokane St	Beach Dr SW to W Marginal Way SW	1.00	0.54	0.88	0.58	0.92

Screenline	Location	Extents	V/C Threshold	Alternative 1, No Action, with STP		Preferred Alternative	
				N/E	S/W	N/E	S/W
9.12	South of Spokane St	E Marginal Way S to Airport Way S	1.00	0.71	0.50	0.72	0.51
9.13	South of Spokane St	15th Ave S to Rainier Ave S	1.00	0.76	0.69	0.79	0.73
10.11	South of S Jackson St	Alaskan Way S to 4th Ave S	1.00	0.82	0.82	0.84	0.85
10.12	South of S Jackson St	12th Ave S to Lakeside Ave S	1.00	0.75	0.81	0.78	0.84
12.12	East of CBD	S Jackson St to Howell St	1.20	0.39	0.43	0.40	0.44
13.11	East of I-5	NE Northgate Way to NE 145th St	1.00	>1.00	0.87	>1.00	0.89
13.12	East of I-5	NE 65th St to NE 80th St	1.00	0.65	0.60	0.71	0.66
13.3	East of I-5	NE Pacific St to NE Ravenna Blvd	1.00	0.73	0.68	0.77	0.72
A1	North of Seneca St	1st Ave to 6th Ave	N/A	0.63	0.63	0.67	0.65
A2	North of Blanchard	Elliott Ave to Westlake Ave	N/A	0.46	0.40	0.48	0.42
A3	East of 9th Ave	Lenora St to Pike St	N/A	0.47	0.92	0.50	0.92
A4	South of Mercer St	Elliott Ave W to Aurora Ave N	N/A	0.62	0.70	0.67	0.70
A5	East of 5th Ave N	Denny Way to Valley St	N/A	0.51	0.49	0.51	0.51
A6	North of Pine St	Melrose Ave E to 15th Ave E	N/A	0.37	0.39	0.39	0.41
A7	North of James St– E Cherry St	Boren Ave to 14th Ave	N/A	0.51	0.35	0.51	0.36
A8	West of Broadway	Yesler Way to E Roy St	N/A	0.60	0.53	0.65	0.56
A9	South of NE 45th St	7th Ave NE to Montlake Blvd NE	N/A	0.52	0.65	0.54	0.67
A10	East of 15th Ave NE	NE 45th St to NE 52nd St	N/A	0.61	0.62	0.69	0.65
A11	South of Northgate Way (N/NE 110th St)	N Northgate Way to Roosevelt Way NE	N/A	0.60	0.70	0.59	0.71
A12	East of 1st Ave NE	NE 100th St to NE Northgate Way	N/A	0.55	0.62	0.57	0.53

Note: Impacted corridors are shown in bold.
Source: Fehr & Peers, 2025.

Intersection LOS—NE 130th / NE 145th Street Subarea

Exhibit 3.10-88 summarizes the LOS and vehicle delay for each study intersection under the Preferred Alternative. As noted earlier, the SoundCast travel demand model was updated for this Final EIS to reflect the network maps, policy direction, and candidate projects identified in the STP. These assumptions were also carried through to the traffic operations analysis at the intersection level. Most relevant to this subarea are the assumed reconfiguration of NE 130th Street and NE 145th Street to reallocate some general purpose vehicle capacity to facilities for other modes such as transit lanes, bicycle lanes, and/or widened sidewalks.

Under the Preferred Alternative, seven intersections are expected to have increases in delay relative to Alternative 1, No Action, that would constitute significant impacts:

- N 145th Street / Aurora Avenue N
- NE 145th Street / 15th Avenue NE
- N 130th Street / Aurora Avenue N
- N 130th Street / Meridian Avenue N
- N 130th Street / 1st Avenue NE
- Roosevelt Way NE / NE 125th St / 10th Ave NE
- NE 125th Street / 15th Avenue NE

Exhibit 3.10-88. 130th/145th Street Subarea PM Peak Hour Level of Service—Preferred Alternative

ID	Intersection	Alternative 1, No Action, with STP—Level of Service / Delay (seconds)	Preferred Alternative—Level of Service / Delay (seconds)
1	NE 155th St / 5th Ave NE	B / 17	C / 22
2	**N 145th St / Aurora Ave N**	**F / 98**	**F / 126**
3	N 145th St / Meridian Ave N	C / 24	C / 29
4	N 145th St / 1st Ave NE	C / 28	D / 37
5	NE 145th St / I-5 On & Off Ramps	A / 5	A / 6
6	NE 145th St / 5th Ave NE	C / 30	D / 44
7	**NE 145th St / 15th Ave NE**	**E / 73**	**E / 79**
8	N 137th St / Meridian Ave N / Roosevelt Way N	B / 14	C / 20
9	**N 130th St / Aurora Ave N**	**F / 83**	**F / 124**
10	**N 130th St / Meridian Ave N**	D / 43	**E / 66**
11	**N 130th St / 1st Ave NE**	**F / >150**	**F / >150**
12	NE 130th St / I-5 On Ramp	B / 12	B / 13
13	NE 130th St / Roosevelt Way NE / 5th Ave NE	C / 34	D / 37

ID	Intersection	Alternative 1, No Action, with STP—Level of Service / Delay (seconds)	Preferred Alternative—Level of Service / Delay (seconds)
14	**Roosevelt Way NE / NE 125th St / 10th Ave NE**	D / 32	**F / 58**
15	**NE 125th St / 15th Ave NE**	**F / 95**	**F / 126**

Note: Impacted intersections are shown in bold.
Source: Fehr & Peers, 2025.

State Facilities

Exhibit 3.10-89 shows a comparison of the Preferred Alternative forecasted volume to the maximum service volume needed to maintain the LOS standard at each of the identified state facility study locations. I-5 at the Ship Canal Bridge and north of the West Seattle Bridge, SR 99 at the Aurora Bridge and north of N Northgate Way, SR 509 at the 1st Avenue Bridge and SR 522 south of NE 145th Street are forecasted to have demand more than 20% over the maximum service volume, indicating substantial vehicle congestion for some hours of the day. The locations with the highest expected congestion are the I-5 Ship Canal Bridge and the SR 99 Aurora Avenue Bridge, reflecting that general purpose vehicle capacity across the Ship Canal is provided via a limited number of bridges. Volumes at all locations are expected to remain similar or increase relative to Alternative 1, No Action.

Eight study locations are projected to operate at or above the maximum service volume for LOS D with both Alternative 1, No Action, and the Preferred Alternative. At all eight of those locations, the Preferred Alternative would result in volume to maximum service volume ratios increasing by at least 0.01, constituting a significant impact:

- I-5 north of NE Northgate Way
- I-5 at the Ship Canal Bridge
- I-5 north of the West Seattle Bridge
- I-90 at the Mount Baker Tunnel
- SR 99 north of N Northgate Way
- SR 99 at the Aurora Avenue Bridge
- SR 509 at the 1st Avenue S Bridge
- SR 522 south of NE 145th Street

Because the Preferred Alternative would cause volumes to increase on multiple state facilities already expected to fall below WSDOT's LOS D standard with Alternative 1, No Action, a significant impact to state facilities is expected with the Preferred Alternative.

Exhibit 3.10-89. Daily State Facilities Level of Service—Preferred Alternative

Facility	Extents	WSDOT LOS Standard	Alternative 1, No Action, with STP—Volume to Maximum Service Volume Ratio	Preferred Alternative—Volume to Maximum Service Volume Ratio
I-5	**North of NE Northgate Way**	D	1.02	**1.03**
I-5	**Ship Canal Bridge**	D	>1.20	**>1.20**
I-5	**North of West Seattle Bridge**	D	>1.20	**>1.20**
I-5	North of Boeing Access Rd Ramp	D	0.98	0.98
I-90	**Mt Baker Tunnel**	D	1.00	**1.01**
SR 99	**North of N Northgate Way**	D	1.20	**>1.20**
SR 99	**Aurora Ave Bridge**	D	>1.20	**>1.20**
SR 99	Tunnel	D	0.65	0.69
SR 99	North of West Seattle Bridge	D	0.77	0.79
SR 99	South of S Cloverdale St	E (mitigated)	0.44	0.45
SR 509	**1st Ave S Bridge**	D	>1.20	**>1.20**
SR 519	S Atlantic St West of I-90 Ramps	D	0.86	0.90
SR 520	Lake Washington Bridge	D	0.88	0.91
SR 522	**South of NE 145th St**	D	>1.20	**>1.20**

Note: Impacted locations are shown in bold.
A ratio of >1.2 indicates a demand of more than 20% over the maximum service volume, indicating substantial vehicle congestion for some hours of the day. The WSDOT standard is equivalent to a 1.0 (the denominator is the maximum volume at which LOS D can be maintained).
Source: Fehr & Peers, 2025.

3.10.3 Mitigation Measures

The impacts to the transportation system identified in the previous sections include effects on transit passenger load, corridor travel time, screenlines, intersection LOS in the NE 130th/NE 145th Street Subarea, and state facilities~~, and parking~~. This section explores ways in which Seattle could potentially reduce the severity of those adverse impacts. These measures would be considered holistically within the framework of other goals and policies in the Comprehensive Plan. For example, while some transportation impacts identified through the preceding analysis stem from increased traffic congestion, the City has prioritized reducing vehicle demand rather than increasing roadway capacity.

The mitigation strategies described below are organized into main themes though many measures relate to and complement one another.

- Transportation Systems Management and Operations (TSMO)
- Transportation Demand Management (TDM)
- Pedestrian and Bicycle System Improvement
- Transit Strategies
- Parking Management Strategies
- Safety Strategies

Secondary Impacts

Some transportation mitigation projects could have secondary impacts. For example, the City may choose to increase the capacity to move people along its right-of-way by reallocating space to transit. A reallocation of general purpose travel lanes would make more efficient use of city streets and help accommodate growth, but could have a secondary impact on auto travel. ~~For example, converting a general-purpose travel lane or a parking lane to a transit lane, truck-only lane, or cycle track would reduce capacity for autos to travel~~. As required, the City would prepare additional analysis and take public and stakeholder input into consideration before implementing specific transportation improvement projects, whether they are included in the STP or identified as mitigation for an action alternative. Given the programmatic nature of this EIS, this Mitigation Measures section lists the types of projects that could be considered to mitigate potential impacts of the action alternatives.

Regulations & Commitments

Transportation Systems Management and Operations (TSMO)

Transportation systems management and operations (TSMO) 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.

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, the ~~Seattle's *Transit Master Plan, Freight Master*~~*Seattle Transportation 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.

Potential strategies that Seattle might consider include:

- Intelligent transportation systems (ITS) applications such as dynamic message signs to alert travelers to incidents and provide travel information about route choices.
- Transit signal priority (TSP) to facilitate transit movements at intersections, reducing travel times for transit vehicles.
- Automated enforcement of transit-only lanes and "don't block the box."
- Freight operations management to prioritize freight movements at specific locations and times.
- Reallocating travel lanes to serve specific uses such as transit and/or freight.
- Signal timing to improve vehicular flow along corridors.
- Wayfinding to improve route decisions and reduce illegal movements.
- Geometric or configuration improvements at intersections to facilitate key bus or truck turning movements.
- Improvements to pedestrian facilities such as crosswalk designs for increased safety, curb bulb-outs to reduce the distance to cross a street, curb ramps for accessibility, and signal timing improvements that increase pedestrian visibility at intersections.

Local and regional TSMO strategies could be combined to achieve greater reductions in impacts and maximize efficient operation of the transportation system. Seattle has historically funded some system improvements through voter-approved levies ($365M Bridging the Gap approved in 2006 and $930M Levy to Move Seattle approved in 2015). Since the publication of the Draft EIS, Seattle voters approved a $1.55 billion Seattle Transportation Levy which replaces ~~As~~ the Levy to Move Seattle ~~will~~ that expired at the end of 2024.~~,~~ The Seattle Transportation Levy will provide additional funding to SDOT over the next eight years ~~may consider putting forward a new levy~~ to ~~sustain funding for~~implement continued improvements. Other improvements may require partnering with regional and state agencies.

Transportation Demand Management (TDM)

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 below along with additional measures Seattle could consider adding to its programmatic TDM efforts.

Commute Trip Reduction

The Washington State Commute Trip Reduction (CTR) Law, passed in 1991, requires large employers to implement employee commute programs to reduce drive alone peak-hour commute trips, with the goals of reducing traffic congestion and energy use and improving air quality. The CTR Law applies to employer worksites with at least 100 employees who begin work between 6 and 9 AM on weekdays. Employers who meet this threshold must develop commute trip reduction plans and work toward meeting their mode share targets through internal programs and monitoring. Affected employers must:

- Designate a transportation coordinator.
- Distribute information about non-drive alone commute options to employees.
- Survey employees every other year to measure vehicle miles traveled (VMT) and mode choice.
- Implement measures designed to achieve CTR goals adopted by the jurisdiction in which they are located.

The CTR program is currently undergoing a shift in the funding allocation and approach to better meet employer and jurisdictional needs and increase the effectiveness of the program. The changes to the CTR program present an opportunity for Seattle to reevaluate the City's TDM programs and implement new strategies to improve employer-focused TDM efforts and further reduce drive alone travel.

Transportation Management Programs

Seattle requires some large buildings to implement a Transportation Management Program (TMP) as part of the development review process. The TMP includes strategies the building managers must implement to encourage tenants to travel by transit, walking, biking, and/or carpooling. Parking management strategies are often included as well. A TMP typically includes measures such as:

- Travel options information displayed in a centrally located part of the building.
- Transit pass subsidies for tenants.
- Pedestrian and bicycle improvements and wayfinding signs directing tenants to nearby facilities.
- Bike parking and locker/shower facilities.
- Parking management strategies to minimize the number of vehicle trips made to and from the building.
- Preferred parking and subsidies for vanpool and carpool users.
- Telework and hybrid work options

Seattle also works with the building managers to set site-specific mode share targets and adjust the TDM approaches as needed to meet those goals.

Commuter Benefit Ordinance

In 2020, Seattle' Commuter Benefit Ordinance took effect, requiring businesses with 20 or more employees to offer their workers the option of making a pre-tax payroll deduction for transit or vanpool expenses. This program offers a financial incentive to workers and businesses to use non-SOV travel options by lowering their tax obligation.

Mobility Management through Vehicle Pricing

Over the past decade, the City of Seattle and other regional partners have committed to exploring how an equitable vehicle pricing mechanism could be implemented. This concept is also included in the recently adopted STP which identifies market mechanisms such as vehicle pricing as a mobility management strategy that could encourage walking, biking, and transit trips. This could also act as a funding source for transportation investments to transit, walking, and biking. To pursue this strategy, the STP includes the following actions:

- Explore equitable demand management tools that could influence travel choices and create revenues to invest in sustainable transportation options, freight movement, and innovation.
- Work with regional partners as they explore pricing options that are equitable and do not put the city at a competitive economic disadvantage.

Mobility Management through Parking Pricing & Supply

The City of Seattle has also committed to exploring mobility management through parking pricing. As with vehicle pricing, this concept is included in the STP as a mobility management strategy that could encourage walking, biking, and transit trips and supplement funding sources for transportation investments. To pursue this strategy, the STP includes the following actions:

- Expand the geography of and increase rates for paid on-street parking to encourage the use of less expensive and lower-pollution travel options.
- Continue to apply performance-based parking pricing rates and time limits to regulate on-street parking demand.

The amount of parking supply in a particular area also influences travel choices. SDOT could consider changes to its parking requirements (both minimums and maximums) to influence the amount of parking provided with new development.

Additional TDM Measures

In addition to the ongoing programs and ordinances in place, Seattle could consider further expanding their TDM efforts. Research compiled by the California Air Pollution Control Officers Association (CAPCOA), surveys the spectrum of TDM strategies and provides data

demonstrating which approaches can substantially reduce vehicle trips. Additional new or expanded TDM measures could include:

- Expand subsidized transit pass programs.
- Expand trip reduction programs to include new participants such as smaller businesses, residents, or community members.
- Improve bicycle and pedestrian facilities, including last-mile connections and end of trip facilities such as bicycle parking.
- Expand bike share/scooter share programs.

TDM program expansion, combined with other complementary strategies included in this section could help increase non-SOV mode share and reduce congestion to mitigate some impacts of the action alternatives.

Transportation Concurrency & Mitigation

SMC 23.52 subchapter 1 implements GMA policy that transportation improvements or strategies should be made concurrently with land development. SMC 23.52 subchapter 2 requires impact analysis and mitigation for projects meeting certain standards.

Pedestrian & Bicycle System Improvements

Improvements to the pedestrian and bicycle network can help provide last-mile connections and active transportation options that could increase the share of people walking and biking and mitigate impacts related to traffic congestion. Seattle is working to grow its share of people walking to 27% and people bicycling to 8%, by 2044. A well-documented connection exists between improved, safer bicycle and pedestrian accessibility and reduced demand for vehicle travel (CAPCOA 2021).

Seattle has ~~a Pedestrian Master Plan and Bicycle Master Plan~~its Capital Improvement Program and recently adopted STP programmatic directions as well as many subarea plans tailored to specific neighborhoods. All of these plans include recommendations to improve conditions for active transportation modes. Types of projects include concrete sidewalks, asphalt walkways, or painted walkways; signals to make crossing roadways easier and safer; treatments such as rectangular rapid flashing beacons (RRFBs) to alert drivers to people crossing the street; marked crosswalks; curb bulbs or extensions to shorten crossing distances and make people walking more visible to drivers; bicycle lanes (particularly protected and buffered bicycle lanes); and multi-use trails. ~~SDOT is currently working to refine and integrate these prior plans into a single multimodal plan in the upcoming Seattle Transportation Plan.~~

Other pedestrian and bicycle improvements will be implemented in conjunction with forthcoming Link light rail stations~~as part of the City's partnership with Sound Transit to plan for the station areas around the West Seattle and Ballard Link Extensions~~. The~~se~~ West Seattle Link Extension station areas include neighborhoods in Alaska Junction, Avalon, Delridge, and SODO.~~,~~ The Ballard Link Extension station areas include neighborhoods in Chinatown-

International District, Downtown, South Lake Union, Uptown, Smith Cove, Interbay, and Ballard. In addition, new infill stations along the existing 1 Line will include 130th Street and Graham Street stations and the 2 Line connection to Seattle will include the Judkins Park Station. The City and Sound Transit are currently coordinating on transportation improvements around expanded and new light rail stations in these areas to support residents and workers in accessing transit. These projects include better connections to surrounding neighborhoods through sidewalks, bike lanes, and shared use paths, and improving transit connections and transfers through community and mobility hubs.~~While specific projects have not yet been identified, it is assumed that Sound Transit will be constructing improvements in the immediate vicinity of each station as part of their project. Additional improvements could also be implemented through Sound Transit's System Access Fund which awards funds to jurisdictions to design and construct improvements that make it easier and more convenient for people to reach transit. This could include capital projects such as sidewalks, bike lanes, shared use paths, transit integration, and pick-up/drop-off facilities.~~

Seattle could also consider refining its development code to include requirements for pedestrian and bicycle infrastructure as part of frontage improvements. These investments in the multimodal transportation network would help provide alternate travel options and a more complete network, reducing reliance on SOV travel while increasing the share of people walking and biking thereby lessening traffic congestion impacts.

Transit Strategies

Potential impacts to transit passenger load were identified ~~on four RapidRide routes under~~for each of the action alternatives. However, it is unknown how future transit ridership levels will evolve with changing travel trends and land use changes, as demonstrated by the sensitivity test described in the previous section. King County Metro continually tracks ridership by route and trip using their automatic passenger counters allowing them to revise service to adapt to changing demands. The City could utilize an adaptive management approach to monitor crowding in partnership with King County Metro. Should it become apparent that some routes are exceeding King County Metro's crowding thresholds, the City of Seattle and King County Metro could identify potential measures, potentially including reallocating service hours within the city or pursuing funding for increased service levels. ~~The purchase of increased Metro service has occurred in the past via a voter-approved funding measure.~~

Safety Strategies

Potential impacts to safety have been identified under all future year alternatives due to the likely increase of overall exposure associated with higher numbers of people traveling by all modes. SDOT is working to incorporate proven safety countermeasures throughout their capital projects as well as employ a Safe Systems approach. Improvements to the active transportation network, as described in the previous section, could help mitigate some safety issues by providing dedicated facilities to separate people walking, biking, or rolling from

vehicular traffic and adding design elements to increase their visibility to drivers in areas of higher conflict such as intersections.

SDOT has ongoing safety programs that are aimed at reducing the number of collisions. This includes an array of strategies to reduce speeding such as street redesigns, traffic calming, and volume management. Many of the mitigation measures noted in the **Pedestrian & Bicycle System Improvements** section would also benefit safety of vulnerable users including: new sidewalks and walkways; signals to make crossing roadways safer; treatments such as rectangular rapid flashing beacons (RRFBs) to alert drivers to people crossing the street; marked crosswalks; curb bulbs or extensions to shorten crossing distances and make people walking more visible to drivers; protected and buffered bicycle lanes; and multi-use trails. Seattle may expand automated enforcement/safety cameras to help reduce speeding and red light running. SDOT may also pursue expanding strategies such as reducing speed limits, implementing leading pedestrian intervals, traffic calming treatments, new traffic signals, separation of facilities for vulnerable users, and other physical changes to transportation facility design.

These types of projects can reduce not only the number of collisions that occur but also the severity of those that do occur. Projects to address potential safety impacts could be implemented through City-led efforts or in partnership with new development through the development review and permitting process.

Coordination with Washington State Department of Transportation & Ferries

WSDOT and WSF frequently reviews large development projects near state facilities to identify potential impacts and suggest mitigation measures. The City could work with WSDOT and WSF to improve this coordination and to ensure that WSDOT and WSF continue to receive notices if SEPA thresholds are raised.

Other Potential Mitigation Measures

Intersection-Specific Improvements

Analysis of the action alternatives, relative to Alternative 1 No Action, identified seven The following impacted intersections could be significantly impacted by one or more action alternatives. The impacted intersections are listed below:

- N 145th Street / Aurora Avenue N
- NE 145th Street / 5th Avenue NE
- NE 145th Street / 15th Avenue NE
- N 130th Street / Aurora Avenue N
- N 130th Street /Meridian Avenue N
- N 130th Street / 1st Avenue NE

- NE 130th Street / Roosevelt Way NE / 5th Avenue NE
- Roosevelt Way NE / NE 125th St / 10th Avenue NE
- NE 125th Street / 15th Avenue NE

Each intersection was evaluated to identify potential mitigation measures that would address delay impacts such that intersection delays would not exceed the five second impact threshold relative to Alternative 1.

Some impacts could be addressed with more minimal interventions such as signal timing and phasing modifications while others would require physical changes to the intersections to expand capacity, for example adding turn pockets or lanes. However, adding physical capacity to these intersections is likely not practical or desirable due to right-of-way constraints and potential secondary impacts to other modes, and conflicts with the network maps and policy direction included in the adopted STP. As described in the analysis for the Preferred Alternative, the modeling assumptions based on the STP network maps, policy direction, and candidate projects include reconfiguring NE 130th Street and NE 145th Street to reallocate some general purpose vehicle capacity to facilities for other modes such as transit lanes, bicycle lanes, and/or widened sidewalks. The adopted STP also includes potential~~Instead, the City would likely pursue~~ multimodal improvements aimed at making transit, walking, and biking more convenient and comfortable such that people have more options to choose from when traveling through the neighborhood. ~~The STP, described in the following section, outlines the types of multimodal improvements that are being considered.~~ Therefore, it is likely that intersection LOS at some locations would continue to operate below the threshold set forward in this EIS.

Seattle Transportation Plan

The City ~~is currently developing~~adopted the STP in April 2024. The STP ~~which considers how the level of~~guides transportation infrastructure investment ~~in infrastructure~~over the next 20 years with the goal of creating safer, more equitable, reliable, sustainable, and affordable travel options ~~for people walking, biking, and riding transit could improve transportation outcomes~~. ~~The EIS for the STP considers three alternatives:~~

- ~~**No Action**: This alternative represents the future of Seattle's transportation system where the city implements no additional multimodal or other transportation improvements beyond what is funded today. This alternative focuses on optimizing existing conditions in the transportation system with no new additional dedicated space for transit, pedestrians, or bikes. Roadway operations are optimized at key intersections, limited spot safety improvements are made throughout the network, and very limited slow zones are implemented on key pedestrian spaces. *Because this alternative reflects currently adopted plans, this is the network assumed for this Comprehensive Plan EIS.*~~
- ~~**Moderate Pace:** This alternative envisions a future with moderate growth in funding for new multimodal infrastructure in Seattle's transportation system. This alternative takes a modest approach to expanding pedestrian, bicycle, and transit connections. Some space for general~~

purpose vehicular traffic in this alternative would be reallocated to dedicated spaces for other modes including some improvements to the public and pedestrian realm. In this alternative, the city implements a modest set of the overarching policies of the STP. These include some restricted areas for general purpose traffic or "car-lite streets", a moderate number of mobility hubs and speed limits below 20 mph on higher-density residential streets.

- **Rapid Progress:** This alternative envisions a future with strong growth in funding for expanded and enhanced multimodal infrastructure in Seattle's transportation system. This option includes substantial improvements to the pedestrian, bicycle, and transit networks. It reallocates some general-purpose lanes to dedicated spaces for other modes to create a more balanced distribution of space for all mobility options. This alternative also includes a broad range of improvements to the public and pedestrian realm and additional dedicated space for goods movement through the city. In this alternative, the city fully implements overarching policies of the STP with car-free streets, electrification infrastructure, a wider range of mobility hubs, and deploys a road user charge to manage the level of miles driven in personal vehicles.

The proposed STP in February 2024 includes programmatic components as well as a proposed unconstrained list of potential large capital projects, which have been incorporated into the modeling for the Preferred Alternativeproject list derived from the range of potential projects in the Moderate Pace and Rapid Progress alternatives.

Many of the elements of the Moderate Pace and Rapid Progress alternatives listed above could serve as mitigating measures to some of the Comprehensive Plan impacts, namely, transit passenger load, corridor travel time, intersection LOS in the NE 130th/NE 145th Street Subarea, and state facilities. By making non-SOV travel a safer and more convenient option for Seattle's residents, workers, and visitors, the STP could reduce vehicle demand. However, there could also be increased cumulative impacts to corridor travel time, screenlines, and intersection LOS, and state facilities because the Moderate Pace and Rapid Progress alternativesSTP network maps, policy direction, and candidate projects include reductions in roadway general purpose vehicle capacity, whether for car-free streets, car-lite streets, or reallocations of right-of-way to other modes (see **Impacts of Preferred Alternative** section). SDOT may choose not to pursue these projects due to potential impacts and future outcomes from community engagement.It is not possible to identify effects in specific locations as the roadway modifications are not yet known, but there would likely be areas of measurably increased traffic congestion in the vicinities of roadway capacity reductions.

3.10.4 Significant Unavoidable Adverse Impacts

This section identifies the significant and unavoidable adverse impacts to transportation expected to occur with implementation of the action alternatives. Those impacts have been identified relative to the performance of the transportation system if no new actions were taken, i.e., the No Action Alternative. Regardless of the alternative selected, travel demand is expected to increase, resulting in potentially significant adverse impacts to transit passenger

load, corridor travel time, screenlines, intersection LOS in the NE 130th/NE 145th Street Subarea, and state facilities.

Significant impacts to transit were identified under all action alternatives with respect to passenger loads. The mitigation measures described in **Section 3.10.3 Mitigation Measures** could lessen the severity of the passenger load impacts. However, due to the increment of change projected, service levels may not be able to fully mitigate the projected impacts. Therefore, the action alternatives may still result in a significant unavoidable adverse impact to transit capacity.

The City will pursue targeted transportation capacity improvements focused on improved transit, bicycle, pedestrian, and freight connections. Additionally, the City will manage demand using policies, programs, and investments aimed at shifting travel to non-SOV modes. However, the magnitude and duration of traffic congestion during peak periods (as measured using corridor travel time) is expected to be exacerbated as growth continues to occur.

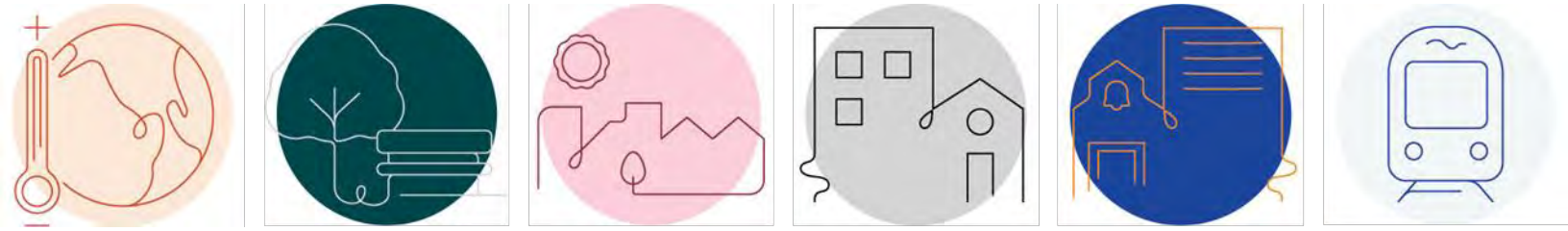
~~As noted in **Section 3.10.3 Mitigation Measures**, some of the impacts to subarea intersections would require physical capacity expansions which are unlikely to be implemented due to right-of-way constraints and potential secondary impacts to other modes. Therefore, the intersection impacts are not expected to be fully mitigated and the action alternatives may still result in a significant unavoidable adverse impact to intersection LOS.~~

Some combination of the travel demand management strategies discussed in **Section 3.10.3 Mitigation Measures** could be implemented to reduce the magnitude of SOV travel. These programmatic measures may lessen the severity of some of the potential impacts, particularly the travel time impacts which are fairly limited in scope. However, in the absence of state facility capacity expansion beyond that already planned and funded or other increased vehicle capacity across the Ship Canal, the action alternatives may still result in significant unavoidable adverse impacts to state facilities and screenlines.

As noted in **Section 3.10.3 Mitigation Measures**, some of the impacts to subarea intersections would require physical capacity expansions which are unlikely to be implemented due to right-of-way constraints and potential secondary impacts to other modes. Therefore, the intersection impacts are not expected to be fully mitigated and the action alternatives may still result in a significant unavoidable adverse impact to intersection LOS.

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3.11 Public Services





Jefferson Park. Source: City of Seattle, 2023.

This section addresses the potential impacts on public services associated with each alternative. Public services are defined as police, fire, emergency medical; parks and recreation; and schools. These services are provided citywide principally by the City of Seattle for police, fire, and parks, and by the Seattle Public Schools for education. Other providers of public safety include the Port of Seattle, King County Metro, and University of Washington. Other private institutions provide education services. Regarding parks, the focus is on Seattle Parks and Recreation Facilities managed with a level of service for the public. Other recreation facilities that are available to the community include public schools and universities, public street ends, Port recreation facilities, and other public lands like Seattle Center and Hiram M. Chittenden Locks.

Impacts of the alternatives are considered significant if they:

- Result in insufficient parks, open space, and trail capacity to serve expected population based on existing levels of service.
- Create inconsistencies with shoreline public access policies.
- Result in increases in public school enrollment that cannot be accommodated through regular school planning processes.
- Increase demand for police or fire and emergency that can't be accommodated through regular planning and staffing processes.
- Result in insufficient capacity to handle solid waste under current Seattle Public Facility plans.

3.11.1 Affected Environment

Police

Information about police services was collected from the Seattle Police Department (SPD) as well as other law enforcement agencies responsible for patrol in the City of Seattle. Data from SPD's 2019 Strategic Plan and the City's adopted 2021 Budget, and 2023-2028 Capital Improvements Plan published calls for service, response times, and crime reports annually inform this analysis. Independent researchers at Seattle University also collect data at the micro- community level through the annual Seattle Public Safety Survey which is available via SPD's Survey Results Dashboard. Coordination between the EIS authors and SPD's Director of Strategic Initiatives also informed this analysis.

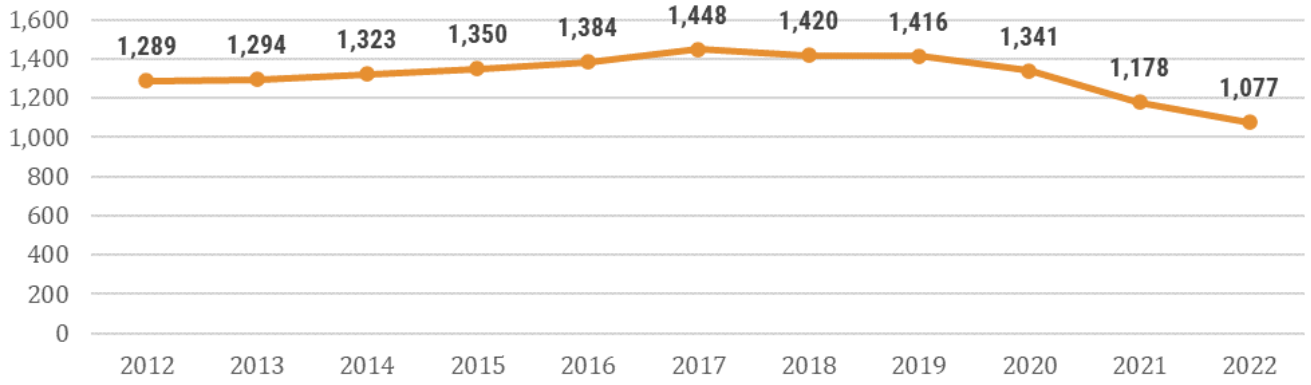
Citywide

Facilities & Staff

The Seattle Police Department (SPD) provides police protection services to the City of Seattle. Its primary duties include foot, car, and bike patrols, harbor patrols, 911 calls, investigations, traffic enforcement, parking enforcement, homeland security, and specialty units such as

Special Weapons and Tactics (SWAT), gang, bomb/arson, and canine units. As of 2022, SPD ~~currently has~~ had 1,077 deployable sworn officers across all precincts and support facilities and between 341 and 405 additional non-officer employees (Washington Association of Sheriffs & Police Chiefs 2022, Socci, 2023). From the same WASP source, a 2023 estimate of sworn officers was 1,065. As of spring 2024, the number of sworn officers was estimated as 917. (Seattle Police Department 2023) **Exhibit 3.11-1** highlights a recent downward trend in officer staffing.

Exhibit 3.11-1. Commissioned SPD Officers



Source: Washington Association of Sheriffs and Police Chiefs, 2023

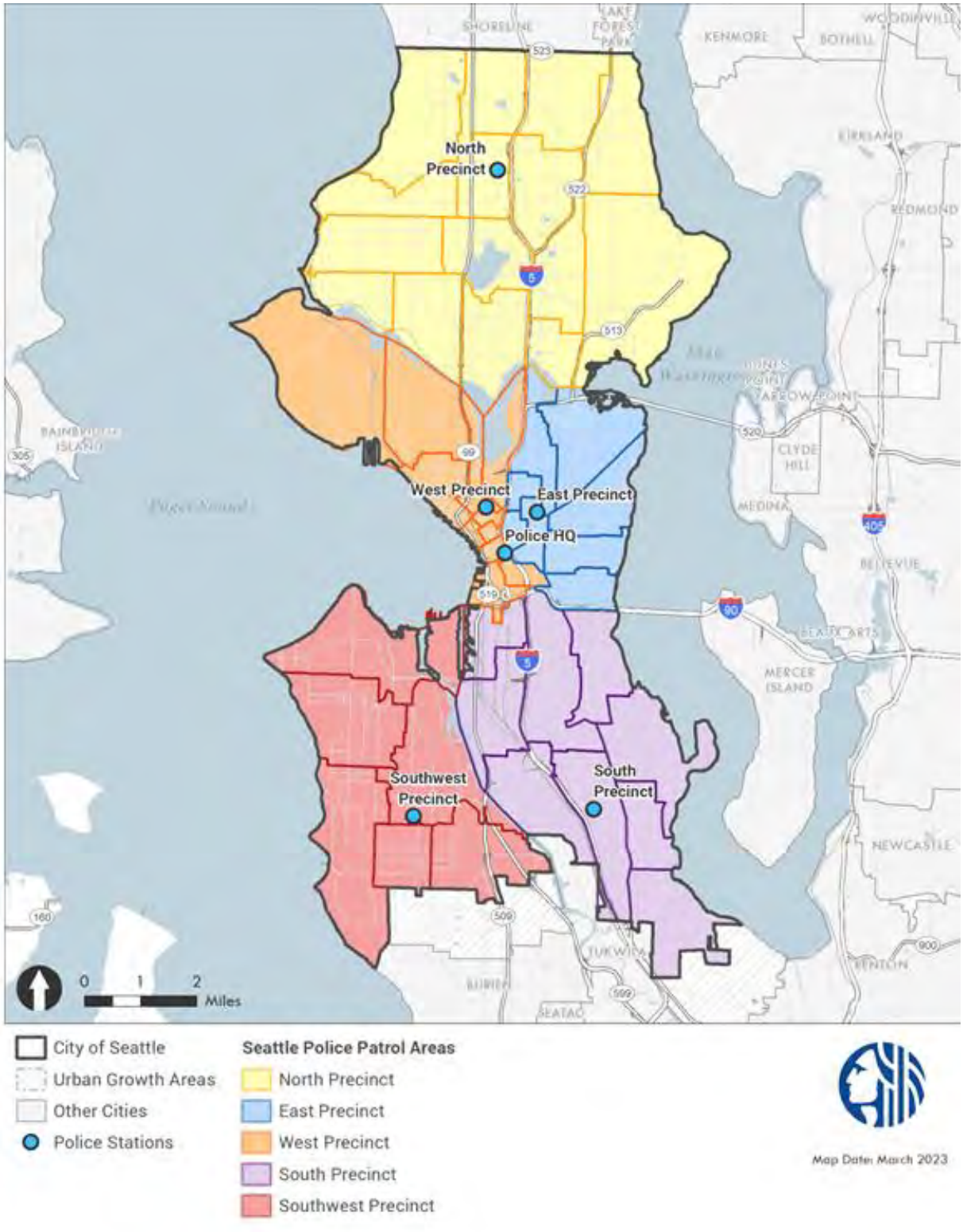
The Department is divided into five precincts, each with a police station that serves as the base of operations for that precinct. Information about the precinct facilities is available in **Exhibit 3.11-2** and the areas of service for each of the precincts are mapped in **Exhibit 3.11-3**.

Exhibit 3.11-2. Police Precinct Facilities

Precinct	Location	Primary Area Served	Sq Ft	Year Built
North	10049 College Way N	North of the Ship Canal to city limits	16,434	1984
West	810 Virginia St	Queen Anne, Magnolia, the Downtown care, and the area west of I-5	46,231	1999
East	1519 12th Ave	Eastlake and the area north of I-90 to the Ship Canal and east of I-5	61,580	1926
South	3001 S Myrtle St East	South of I-90 to city limits and west of the Duwamish	13,688	1983
Southwest	2300 Webster St	West Seattle and the Duwamish Industrial Area	28,531	2002

Source: City of Seattle, 2020

Exhibit 3.11-3. Police Precinct and Beat Boundaries



Sources: City of Seattle 2022; BERK, 2023.

These precincts serve different sectors of city and their alignment with Comprehensive Plan Analysis zones is generally as follows:

A. EIS Study Areas 1 and 2: North Precinct
B. EIS Study Areas 3 and 4: West Precinct
C. EIS Study Area 5: East Precinct
D. EIS Study Area 6: Southwest Precinct
E. EIS Study Areas 7 and 8: South Precinct

Maps illustrating the EIS Study Area boundaries and precincts are available in **Appendix I**.

Police Departments with Shared Jurisdiction

There are some areas and situations where the Seattle Police Department shares enforcement with other agencies.

Port of Seattle Police

The Port of Seattle Police (POSPD) are responsible for patrol and primary law enforcement of multiple different seaport locations as well as SeaTac International Airport which falls outside of the study area. Seaport properties such as the Downtown Seattle terminals, Shilshole Bay Marina, shipping facilities on the Duwamish River, and parts of Harbor Island are monitored by the Marine Patrol Unit and the POSPD Dive Team.

King County Sheriff's Office

Since Seattle is within King County, the King County Sheriff's Office has jurisdictional authority within the city limits as well, but the Seattle Police are considered the primary police agency. SPD works very closely with the King County Sheriff's Office.

Regional Transit Police

Both King County Metro and Sound Transit work closely with SPD but are primarily responsible for transit stops, tunnels, and other regional transit facilities.

Washington State Patrol

The Seattle Police Department shares jurisdictional authority with the Washington State Patrol within the study area's interstate highways.

Washington State Patrol is also the central repository for criminal history information in the State of Washington and runs the Crime Lab for the entire state of Washington.

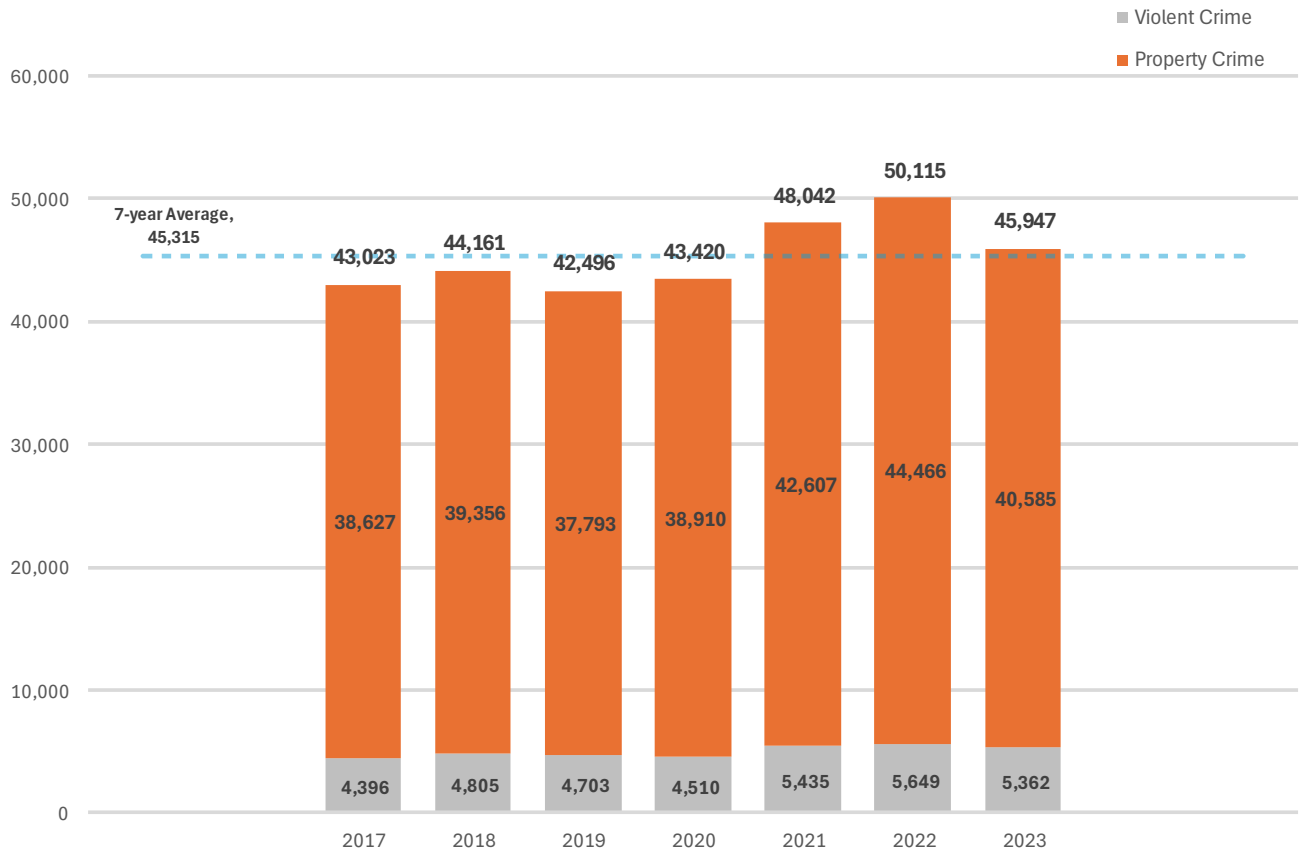
University of Washington Police

This police department has jurisdictional responsibility over the University of Washington Campus and serves as the primary law enforcement and investigative agency. All crime statistics within this jurisdiction are maintained by the University of Washington Police department.

Crime Rates & Service Calls

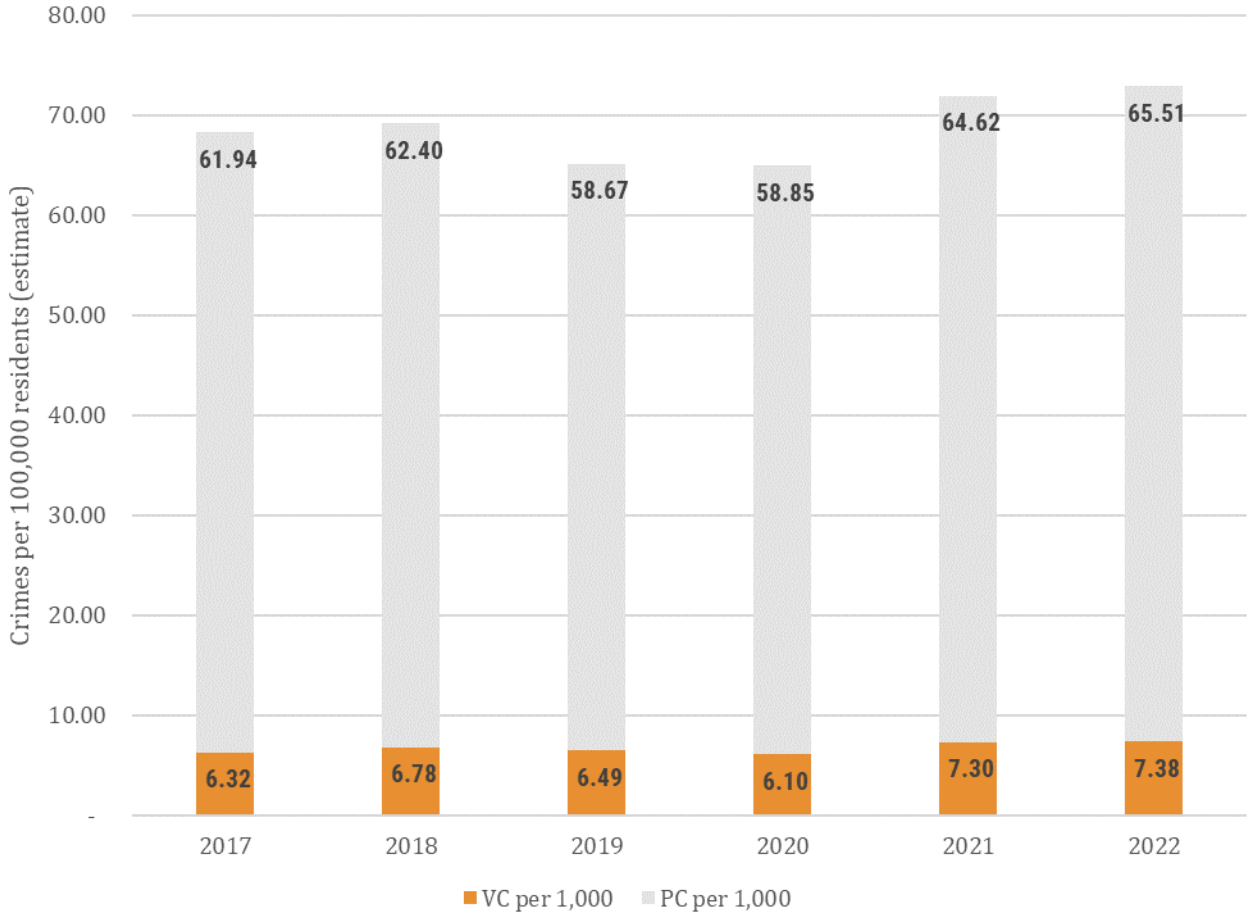
Since 2017, Seattle's crime rate has increased both in aggregate and per capita. In **Exhibit 3.11-4** and **Exhibit 3.11-5** violent crime includes homicide, rape, robbery, and aggravated assault whereas property crime includes burglary larceny and vehicle theft. There was a slight drop in the crime rate in 2019 that has since increased in 2021 and 2022 but dropped back down in 2023 to a level more similar to 2017 – 2020.

Exhibit 3.11-4. Crime Reported, 2017-2023~~2~~



Note: Graph replaced since the Draft EIS to add 2023 and adjust prior year statistics. General order of magnitude is similar.
Sources: Seattle Police Department Crime Dashboard, 2024~~3~~; BERK, 2024~~3~~.

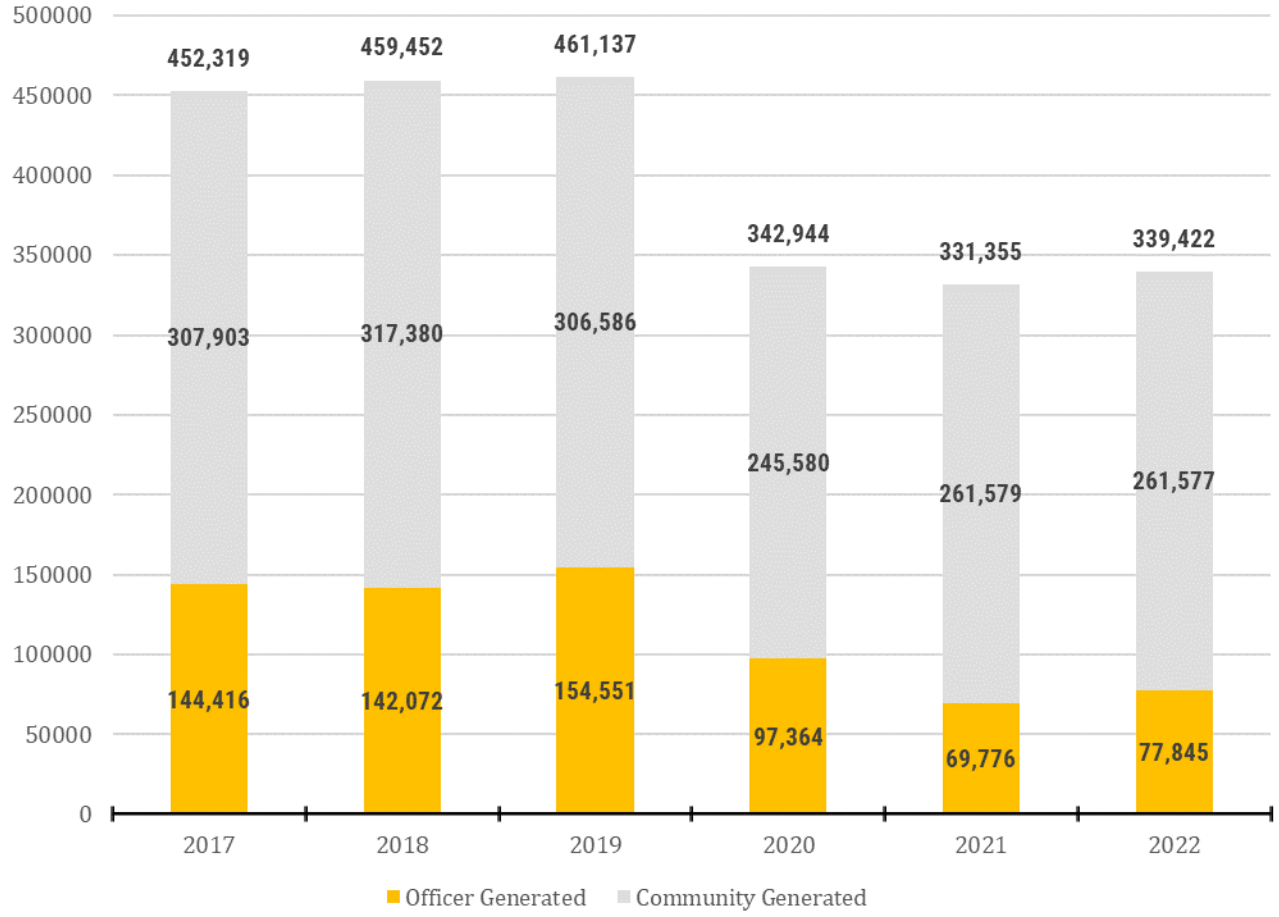
Exhibit 3.11-5. Reported Crime per 1,000 in Population, 2017-2022



Sources: OFM population statistics, 2017-2022; Seattle Police Department Crime Dashboard, 2023; BERK, 2023.

Data from the 2022 Crime Report and the Crime Dashboard show that while the crime rate has increased during this period indicating a positive correlation between population growth and crime rate, the calls for service have gone down significantly during the same period as seen in **Exhibit 3.11-6.**

Exhibit 3.11-6. SPD Citywide Dispatches by Type, 2017-2022

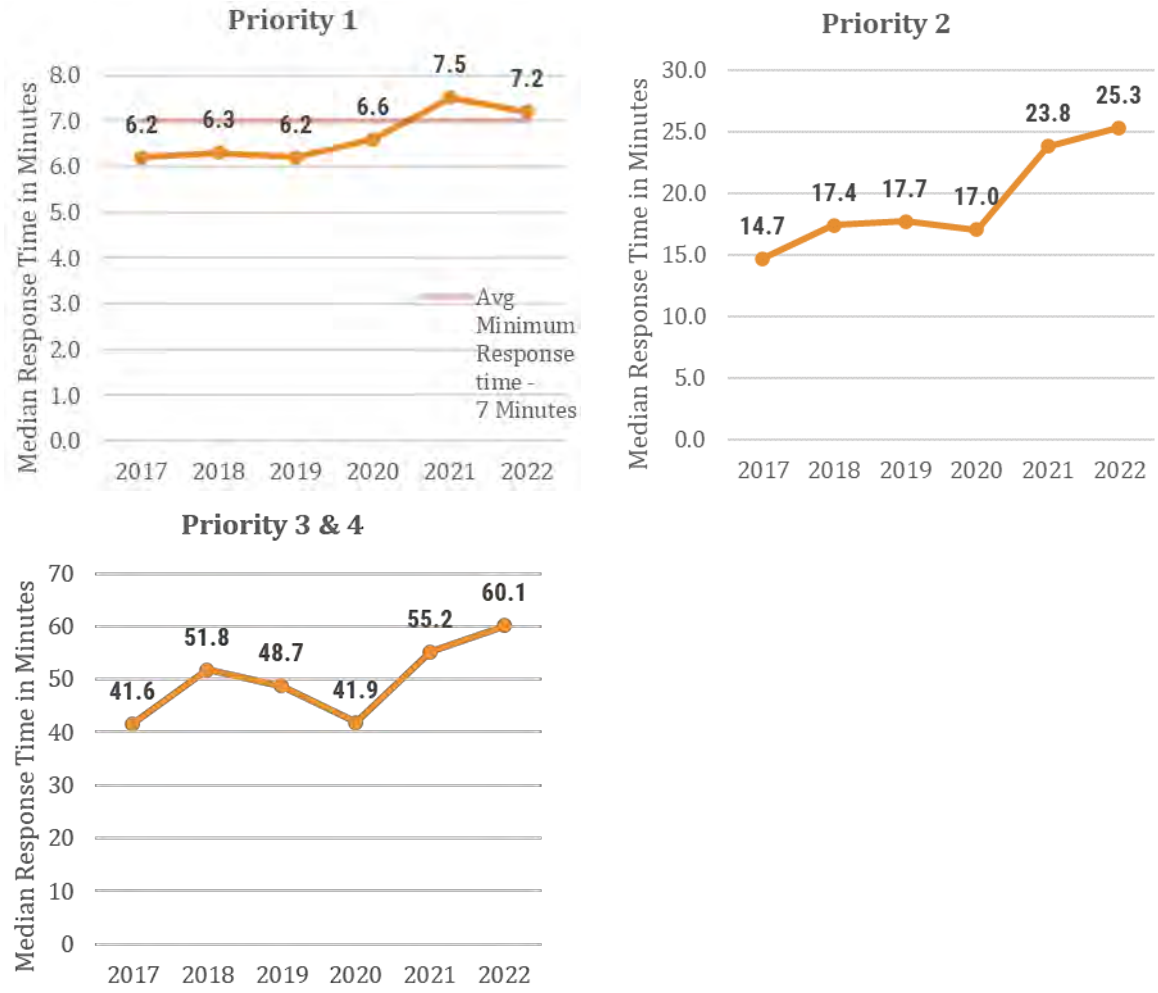


Note: Dispatches that were generated by unknown sources were not counted in this exhibit.
Sources: Seattle Police Computer Aided Dashboard, 2023; BERK, 2023.

Citywide Emergency Response Times

Dispatches are divided into priority 1-4 and the minimum response time level of service is determined by the priority of the call. The response time goal for priority one calls is 7 minutes. SPD has consistently been able to meet or narrowly miss this goal from 2017-2022 as seen in **Exhibit 3.11-7**.

Exhibit 3.11-7. SPD Dispatches and Response Times by Priority, 2017-2022



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

Area Specific

Seattle Police Department is divided into five precincts and each precinct is divided into beats that are patrolled by officers.

Micro-Community Police Plans (MCPP) Priorities

The Seattle Public Safety Survey collects data at the micro-community level about perceptions of crime and public safety, police-community interactions, and knowledge and understanding of the MCPPs. The top five citywide public safety concerns identified in the 2021 survey (in order) were:

1. Police Capacity
2. Property Crime
3. Homelessness
4. Traffic Safety
5. Community and Public Safety Capacity

The top five public safety concerns in each Precinct are listed in **Exhibit 3.11-8**.

Exhibit 3.11-8. Top 5 Safety Concerns by Precinct in Ranked Order, 2021

Precinct	1st	2nd	3rd	4th	5th
East	Police Capacity	Property Crime	Homelessness	Traffic Safety	Community and Public Safety Capacity
North	Police Capacity	Homelessness	Property Crime	Traffic Safety	Community and Public Safety Capacity
South	Police Capacity	Property Crime	Homelessness	Drugs and Alcohol	Community and Public Safety Capacity
Southwest	Police Capacity	Property Crime	Homelessness	Traffic Safety	Community and Public Safety Capacity
West	Police Capacity	Property Crime	Homelessness	Drugs and Alcohol	Community and Public Safety Capacity

Source: Seattle Public Safety, 2021.

Safety concerns are summarized below:

- **East:** Survey respondents in the East Precinct identified the same top five public safety themes as the city. These themes were the same when analyzed at a MCPP level, just in different orders of priority. The Public Safety survey noted that overall, there is less concern

about crime (both day and night) compared to the city and has an overall less favorable view of SPD compared to Nationwide trends.

- **North:** The North Precinct shared similar public safety concerns as the city. However, survey respondents noted drugs and alcohol as a major public safety concern. There is an overall less concern of crime (both day and night) and have a less favorable view of SPD. Looking at MCPPs, Lawlessness was identified as a top theme in Lake City and Homelessness in Fremont, showing some discrepancies in looking at different subareas within the North Precinct.
- **South:** South Precinct Survey responded that Drugs and Alcohol was a higher concern compared to the city than traffic safety. Fear of Crime (both day and night), and perception of SPD, and the police nationwide, is less than the city's average overall. When looking at MCPPs, there were some differences in top public safety concerns. For example, property crime was a top safety concern in SODO.
- **South-West:** Top public safety concerns match city wide themes. The precinct has a higher level of fear of crime (both day and night) and a higher favorable view of SPD and the police nationwide. This is the highest favorable perception of SPD in all the precincts.
- **West:** Survey respondents had similar top public safety themes compared to the city but noted Drugs and Alcohol as a higher priority. The precinct has the highest fear of crime compared to the city and have a high favorable perception of SPD and police nationwide. Violent Crime is also noted as a top priority in the International District when looking at MCPPs.

Staffing & Facilities

SPD's staff is split between its five precincts, headquarters, support facilities, harbor patrol facility, and more. Approximately 514 of the 1,077 commissioned officers are considered precinct staff. See **Exhibit 3.11-9**. Other staff distributions are available in **Exhibit 3.11-9**.

Exhibit 3.11-9. SPD Precinct Staffing as of December 31, 2022

	East		North		South		Southwest		West		Citywide		Total	
	Sargent	Officer	Sargent	Officer	Sargent	Officer	Sargent	Officer	Sargent	Officer	Sargent	Officer	Sargent	Officer
911	11	66	19	116	10	74	8	52	13	107	5	23	66	438
Beats	—	—	—	—	—	—	—	—	1	6	—	—	1	6
Seattle Center	—	—	—	—	—	—	—	—	1	2	—	—	1	2
Total	**11**	**66**	**19**	**116**	**10**	**74**	**8**	**52**	**15**	**115**	**5**	**23**	**514**	

Note: includes phase 3 student officers, personnel who are unavailable due to vacation, training, limited duty, or short-term illness/injury, half time officers, and officers in Acting Sargent assignments. Excludes phase 1 and phase 2 students, detectives, and personnel on extended leave.
Source: SPD, 2023; Socci, 2023

By precinct, the available size and features of each station building is identified below:

A. **North:** The North precinct was built in 1994 and is 16,560 square feet. Currently the department is leasing 5,000 square feet of nearby office space to house additional administrative staff members. It is the base for 135 sworn in officers and 119 additional staff and was designed to accommodate 154 staff. The North Precinct Police station upgrade was put on hold in 2016 to re-address department needs (Seattle, 2018).

B. **West:** The West precinct was built in 1999 and is 46,231 square feet. It is the base for 140 sworn in officers and 82 additional staff and is currently at capacity.[96]

C. **East:** the East precinct was remodeled completely in 1990 and is 31,356 square feet. It is the base for 77 commissioned officers and 107 additional staff and is at capacity.[97]

D. **Southwest:** The Southwest precinct was built in 2002 and is 28,531 square feet. It is the base for 60 sworn in officers and 58 additional staff and was designed to accommodate 131 staff.

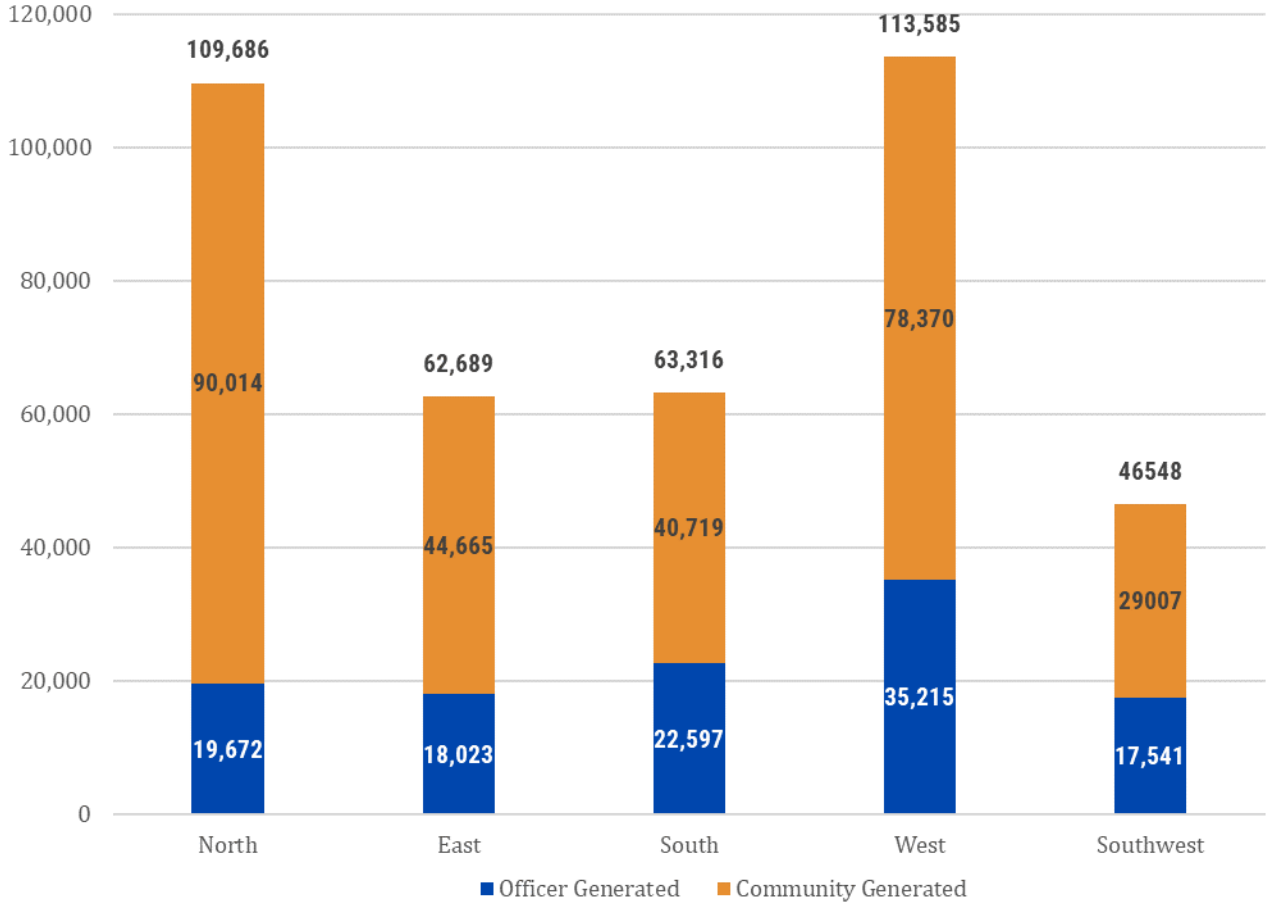
E. **South:** The South precinct was built in 1983 and is 13,700 square feet. It is the base for 84 sworn in officers and 39 additional staff is currently at capacity. The existing facility will require seismic upgrades and renovations to bring the facility up to current standards. Further capacity and staff projection analysis is required.

Precinct Dispatching

Precincts dispatch to officers 911 calls throughout the city and expect officers to respond to possible crimes that they may see on their patrols. The North and West precincts were dispatched the most on average from 2017-2022. These data in **Exhibit 3.11-10** align with citywide data in **Exhibit 3.11-6** to show that most calls are community generated.

[96] Per SPD capacity assessment, design capacity of precinct not available.
[97] Per SPD capacity assessment, design capacity of precinct not available.

Exhibit 3.11-10. Six-year Average (2017-2022) of SPD Dispatches by Type



Source: Seattle Police Computer Aided Dispatch, 2023.

Fire/Emergency Medical Services

Information about fire and emergency medical services was collected from the Seattle Fire Department. SFD's published annual report includes information about the department, incident response trends and response standards, preventative measures taken (e.g., fire code implementation), public events/education, and other notable highlights. Other references include the City of Seattle geolocated call data on its Open Data Portal, SFD's 2012-2017 Strategic Plan, the City's proposed 2023-2024 Budget, and 2023-2028 Capital Improvement Plan. Coordination between EIS authors and SFD personnel knowledgeable about operations and spatial analysis informed this analysis.

Citywide

Level of Service (LOS)

SFD provides fire and rescue response, fire prevention and public education, fire investigation, and emergency medical services (EMS) throughout the city, including the study area. Emergency medical services include basic life support (BLS) and advanced life support (ALS). SFD also has specially trained technical teams that provide technical and heavy rescue, dive rescue, tunnel rescue, marine fire/EMS response, and hazardous materials response. SFD also provides mutual aid response to neighboring jurisdictions.

The 2022 Proposed Budget adds funding to enhance SFD operations in several areas including emergency responses, diversity recruitment, dispatch training, and IT system upgrades. In response to extensive research into community response models and on best practices gleaned from around the country, SFD will add a new specialized triage response program (Seattle City Budget Office 2021, 326).

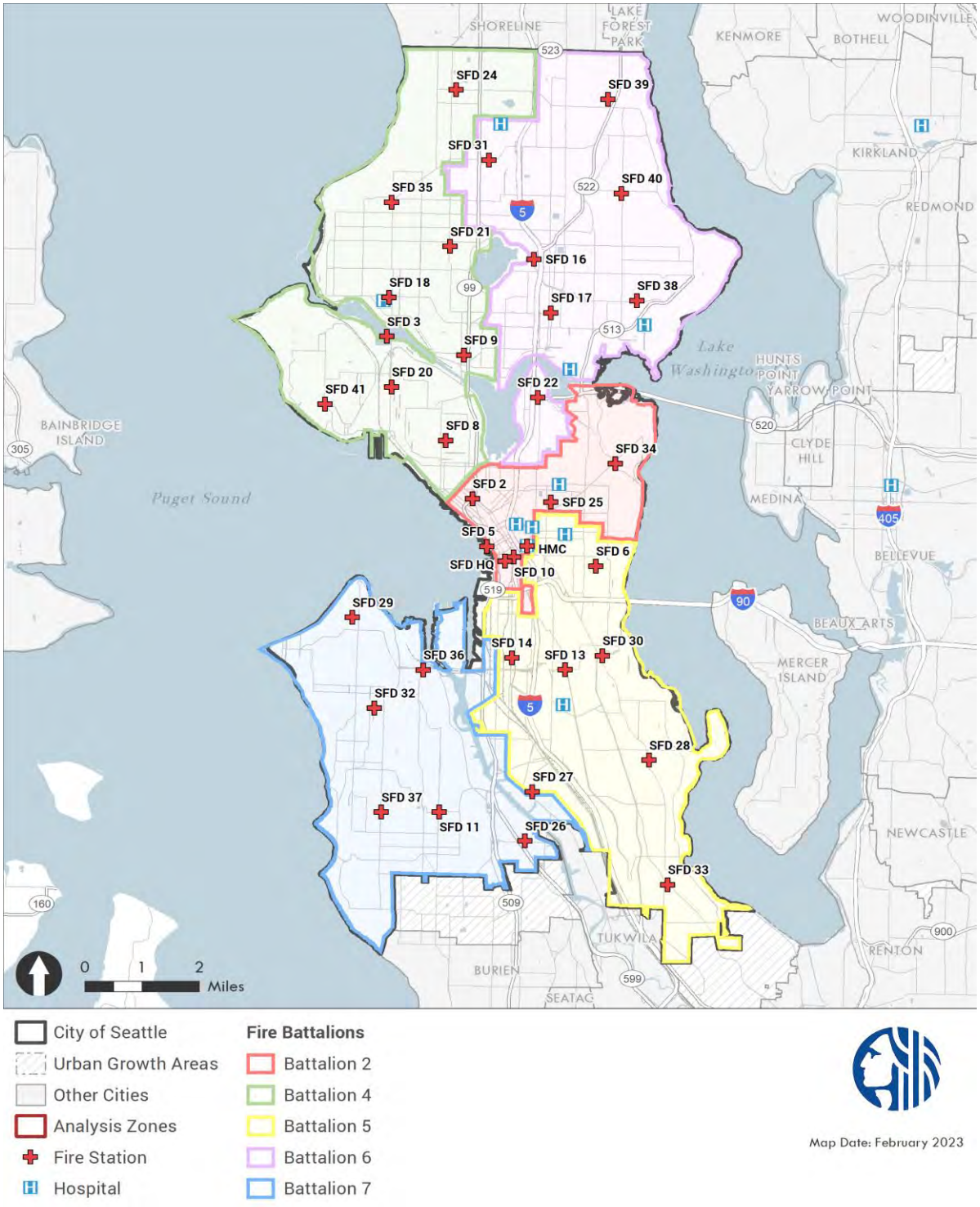
Facilities

SFD provides emergency response services through five battalions consisting of 33 fire stations (plus Battalion 3/Medic One at Harborview Medical Center) strategically placed around the city to maximize coverage and minimize response time. See **Exhibit 3.11-11**. Close up maps of EIS Study Areas and SFD facilities are provided in **Appendix I**.

All SFD stations are staffed 24 hours a day, seven days a week, by four separate shifts of firefighters. There are 216 members responding to emergencies every day across the city (220 with upstaffing for 2 daytime aid cars). In 2021, SFD had 963 uniformed personnel and 81 civilian personnel—uniform personnel include 897 firefighter/EMTs (including chiefs) and 66 firefighter/paramedics (Seattle Fire Department 2021).

These 220 uniformed fire department personnel on the clock 24 hours per day are responsible to provide services for an estimated 391,394 housing units (Seattle Fire 2023). The City also anticipates it will need to replace Station 3 and the Fire Marshal office, acquire, or develop a new facility for SFD Headquarters, replace or expand the commissary and fire garage, develop a fire station in South Lake Union, and develop a freshwater marine fire suppression facility (City of Seattle 2020).

Exhibit 3.11-11. Fire Battalions and Stations



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

Exhibit 3.11-12. SFD Facility Locations and Equipment

Station	Battalion	Equipment	Engine	Ladder	Medic	Fire Boat	Aid
Headquarters	N/A	▪ DEP1 ▪ SAFT2					
Medic One / Harborview Medical Center	N/A	▪ Medic 1 ▪ Medic 10 ▪ Medic 44 ▪ Battalion 3			3		
Fire Station 2—Belltown	2	▪ Engine 2 ▪ Ladder 4 ▪ Aid 2 ▪ Aid 4 ▪ Hose 2	1	1			2
Fire Station 3—Fisherman's Terminal	4	▪ Fireboat Chief Seattle ▪ Fireboat 1*				2	
Fire Station 5—Waterfront	7	▪ Engine 5 ▪ Fireboat 2* ▪ Fireboat Leschi ▪ Rescue Boat 5*	1			2	
Fire Station 6—Central District	5	▪ Engine 6 ▪ Ladder 3	1	1			
Fire Station 8—Queen Anne	4	▪ Engine 8 ▪ Ladder 6	1	1			
Fire Station 9—Fremont	4	▪ Engine 9	1				
Fire Station 10—International District	2	▪ Engine 10 ▪ Ladder 1 ▪ Aid 5 ▪ Aid 10	1	1			2
Fire Station 11—Highland Park	7	▪ Engine 11	1				
Fire Station 13—Beacon Hill	5	▪ Engine 13 ▪ Battalion 5	1				
Fire Station 14—SoDo	5	▪ Aid 14 ▪ Rescue 1 (DECON1 & REHAB1) ▪ Ladder 7**		1			1
Fire Station 16—Green Lake	6	▪ Engine 16	1				
Fire Station 17—University District	6	▪ Engine 17 ▪ Ladder 9 ▪ Medic 17 ▪ Battalion 6	1	1	1		
Fire Station 18—Ballard	4	▪ Engine 18 ▪ Ladder 8 ▪ Medic 18 ▪ Battalion 4 ▪ Hose 18*	1	1	1		
Fire Station 20—West Queen Anne	4	▪ Engine 20	1				

Station	Battalion	Equipment	Engine	Ladder	Medic	Fire Boat	Aid
Fire Station 21—Greenwood	4	▪ Engine 21	1				
Fire Station 22—Roanoke	6	▪ Engine 22	1				
Fire Station 24—Bitter Lake	4	▪ Engine 24 ▪ Air 240	1				
Fire Station 25—Capitol Hill	2	▪ Engine 25 ▪ Ladder 10 ▪ Aid 25 ▪ Battalion 2	1	1			1
Fire Station—26—South Park	7	▪ Engine 26 ▪ Medic 26	1		1		
Fire Station 27—Georgetown	7	▪ Engine 27	1				
Fire Station 28—Rainier Valley	5	▪ Engine 28 ▪ Ladder 12 ▪ Medic 28	1	1	1		
Fire Station 29—Admiral District	7	▪ Engine 29	1				
Fire Station 30—Mount Baker	5	▪ Engine 30 ▪ Air 9	1				
Fire Station 31—Northgate (Interim)	6	▪ Engine 31 ▪ Ladder 5 ▪ Medic 31 ▪ Aid 31	1	1	1		1
Fire Station 32—West Seattle Junction	7	▪ Engine 32 ▪ Ladder 11 ▪ Medic 32 ▪ Battalion 7	1	1	1		
Fire Station 33—Rainier Beach	5	▪ Engine 33	1				
Fire Station 34—Madison Park	2	▪ Engine 34 ▪ Hose 34*	1				
Fire Station 35—Crown Hill	4	▪ Engine 35	1				
Fire Station 36—Delridge & Harbor Island	7	▪ Engine 36	1			1	
Fire Station 37—West Seattle & High Point	7	▪ Engine 37 ▪ Ladder 13	1	1			
Fire Station 38—Hawthorne Hills	6	▪ Engine 38	1				
Fire Station 39—Lake City	6	▪ Engine 39	1				
Fire Station 40—Wedgwood	6	▪ Engine 40	1				
Fire Station 41—Magnolia	4	▪ Engine 41	1				
Totals			**32**	**12**	**9*** **	**5**	**7**** **

* Not listed in 2022 annual report and identified on Seattle Fire Web Page
** Part of Rescue 1 Unit
*** Includes Health 1and added Medic Unit at Station 26
**** Two of seven are "Peak-Time Aid Units."
Source: Seattle Fire 2022 Annual Report, Seattle.gov/fire.

Incident Response Trends

Between 2017 and 2021 total incident responses decreased from 96,822 to 93,233. As shown in **Exhibit 3.11-13**, the number of total responses remained relatively constant in 2017 and 2018, then decreased in 2019 and 2020. The COVID-19 pandemic drove a decrease in EMS calls in 2020—a trend SFD believes resulted from fewer people being outside their homes coupled with a fear of being exposed to the virus—and a rise in fire responses. However, both EMS and fire incident calls increased from 2020 to 2021. Total incident responses increased 16% from 2020-2021 and an additional 12.5% between 2021 and 2022.

Exhibit 3.11-13. Seattle Fire Department Emergency Response Incidents

Year	EMS Incidents: BLS and ALS	Fire and Specialty Incidents*	Other and Mutual Aid**	Total
2017	78,758 (81.3%)	16,548 (17.1%)	1,111 (1.1%)	96,822
2018	76,484 (80.7%)	17,080 (18.0%)	1,128 (1.2%)	94,780
2019	72,980 (79.6%)	18,088 (19.7%)	648 (0.7%)	91,716
2020	61,717 (76.8%)	18,094 (22.5%)	505 (0.6%)	80,316
2021	74,302 (79.7%)	24,616 (26.4%)	53 (0.1%)	93,233
2022	78,808 (74.0%)	27,587 (25.9%)	58 (.05%)	106,453

* "Special Incidents" responses were previously included in "Fire" in 2019 and 2020 but were separated in 2021
** For 2021 "other responses" transitioned to "mutual aid" responses.
Sources: SFD Live and SFD 2019 & 2022 Annual Report.

Response Time

Maintaining or improving emergency response times is the core of Seattle Fire Department operations (Seattle Fire Department, 2012). SFD's response standards specify the minimum criteria needed to deliver fire suppression, special operations response, and emergency medical services (Seattle Fire Department 2020) effectively and efficiently. The Capital Facilities Appendix of Seattle 2035 establishes the following response time standards for the Department (City of Seattle 2020, 529-530):

A. Call Processing Time: 60 seconds for phone answered to first unit assigned for 90% of calls.
B. Fire Response Time: Arrival within 4 minutes for first-arriving engine at a fire for 90% of calls, and arrival within 8 minutes of the full first alarm assignment of 15 firefighters, for 90% of calls.
C. Basic Life Support: Arrival within 4 minutes of the first medical unit with two EMTs, for 90% of calls.
D. Advanced Life Support: Arrival within 8 minutes for 90% of call

Exhibit 3.11-14 shows the statistics the Department uses to measure response time performance. These statistics generally correspond with the Department's response time standards.

Between 2016 and 2020 the Department fell short of meeting its response time standards, with the exception of meeting its call processing time standard in 2018 and its full first alarm assignment standard from 2018-2022. Call processing has also decreased significantly in 2022 to 60%.

Exhibit 3.11-14. Response Statistics, 2017-2022

Year	Call Processing Time within 60 seconds	First Arriving Engine at Fire within 4 Minutes	Full Fire Alarm Assignment at Fire within 8 Minutes	Fire Arriving Unit for a BLS Incident within 4 Minutes	Fire Arriving Unit for an ALS Incident within 8 minutes
Adopted Standard	90%	90%	90%	90%	90%
2017	84%	77%	71%	79%	89%
2018	**92%**	76%	**93%**	79%	86%
2019	64%	75%	**94%**	76%	86%
2020	66%	78%	**92%**	73%	81%
2021	59%	75%	**91%**	73%	81%
2022	60%	76%	**95%**	75%	82%

Sources: Seattle Fire Department Annual Report, 2019, 2021, and 2022; BERK, 2023.

Area Specific

The 2023-2024 proposed operating budget includes a $2.2-million expenditure for 30 additional firefighting recruits, $303,102 for paramedic recruits in 2023, $606,203 for paramedic recruits in 2024. These additional recruit positions are on top of the 60 firefighting recruit positions and 5 paramedic recruit positions that are part of the base budget. The goal of these additional positions is to alleviate vacancies from attrition and retirement within the department.

These recruit positions are not reflected in the current FTE levels by Battalion in **Exhibit 3.11-15**. Other expenditures for fire prevention are increasing from 11.5 million in 2022 to a proposed 11.7 and 11.85 million in 2023 and 2024 respectively.

Exhibit 3.11-15. SFD Staffing and Expenditures Budget by Battalion

Battalion	FTE & Expenditures 2021	FTE & Expenditures 2022	FTE & Expenditures 2023 (proposed)	FTE & Expenditures 2024 (proposed)	Minimum Staff Per Shift (estimate)	Minimum staff for four shifts (estimate)
2	205.45 $28,015,684	205.45 $32,635,307	205.45 $32,309,457	205.45 $32,893,487	42	168
3	82.00 $15,476,222	82.00 $17,419,528	82.00 $17,360,397	82.00 $17,665,117	12	48
4	199.45 $29,591,593	199.45 $33,261,878	199.45 $34,272,162	199.45 $34,883,293	48	192
5	185.45 $28,465,652	185.45 $31,605,322	185.45 $32,044,188	185.45 $32,584,561	44	176
6	169.45 $26,641,698	169.45 $28,850,602	169.45 $29,158,278	169.45 $29,641,374	46	184
7	148.45 $26,619,359	148.45 $25,663,613	148.45 $25,625,945	148.45 $26,028,047	52	208

Source: Seattle Finance Department 2023-2024 proposed budget https://www.seattle.gov/city-budget-office/budget-archives/2023-2024-proposed-budget.

The Battalion staffing levels combined with information received from Seattle Fire about minimum staffing levels for each fire apparatus per shift are also available in **Exhibit 3.11-15**.

This data highlights potential opportunities for shifts in staff resources as well as current estimated staffing needs in each of the battalions. Battalion 6 and 7 are currently running at lower staff than their fire units can support. Battalion 7 Supports the Downtown Waterfront Station 5, South Park, Georgetown, as well as all five stations on the West Seattle peninsula. Battalion 6 supports the entire Northeast quadrant of the city ranging from the Roanoke Station in Eastlake up through Lake City and including the University of Washington and Greenlake.

Both of these Battalions' stations have at least one engine but as is consistent across the city there are far fewer fire units to support emergency medical staff and aid units which make up nearly 70% of dispatches to SFD (Haskell, McAuslan, 2023). These minimum staffing estimates are based on the types of units at each station and were provided by Seattle Fire. Engines & Ladders require four operators per run; Medic Units, Aid Units, and other special apparatuses require between two & four operators per run depending on the unit. Please note that two was used to form the basis of this estimate. (Haskell, McAuslan, 2023).

The subareas for analysis maps are found in **Chapter 2** and are the basis for the growth estimates for each different growth alternative. The subareas align partially with some battalions but do not overlap exactly. The subarea analysis highlights the current levels of service for households within them. ~~**Section 3.12.2, Section 3.11.3,** and **Section 3.11.4** provide additional context for each subarea and the different proposed growth alternatives that will impact public services such as Fire, Police, and Parks.~~

Area 1

Northwest Seattle's seven fire stations service an estimated 79,576 housing units, both the highest number of stations and housing units in Seattle. Each station has an engine and additional units are mostly supported by Station 26 in Ballard that houses specialized apparatuses such as a ladder unit, a medic unit, one of Seattle's two hose and foam units. The Greenwood Station houses Seattle's mass casualty incident unit which has only been dispatched 87 times since data collection began in 2004. The Bitter Lake station houses one of Seattle's two air units. Area 1 also includes Station 31 at Northgate which is currently operating from an interim station until a new station is built. The new station is still currently in the design phase (City of Seattle 2022-2027 Adopted CIP). See **Exhibit 3.11-16** for stations, equipment, staffing, and ratios of fire units to dwelling units.

Exhibit 3.11-16. Stations and Fire Units in Area 1

Stations	Engines (4 Staff Per shift)	Ladders (4 Staff Per Shift)	Medic (2 Staff Per Shift)	Aid (2 Staff Per Shift)	Other Apparatus (~2 Staff Per Shift)
9, 16, 18, 21, 24, 31, 35	7	2	2	1	3
Required Minimum staff per shift	28	8	4	2	6
Housing units per fire unit	11,368	39,788	39,788	79,576	26,525

Sources: Seattle Fire Department Annual Report, 2022; Seattle 2035 Capital Facilities Appendix, 2020; BERK 2023.

Area 2

Northeast Seattle contains four fire stations with one engine per station as well as four other fire and EMS units. The University District Station houses the Battalion 6 vehicle as well as the one medic unit in this subarea. The most notable shortcoming of this subarea's fire station capacity is that it does not have a dedicated aid unit. There are 64,581 households in the service area so aid units and engines from elsewhere in the city respond to these emergencies. This shortcoming may increase response times and decrease service level standards. See **Exhibit 3.11-17** for stations, equipment, staffing, and ratios of fire units to dwelling units.

Exhibit 3.11-17. Stations and Fire Units in Area 2

Stations	Engines (4 Staff Per shift)	Ladders (4 Staff Per Shift)	Medic (2 Staff Per Shift)	Aid (2 Staff Per Shift)	Other Apparatus (~2 Staff Per Shift)
17, 38, 39, 40	4	2	1	0	1
Required Minimum staff per shift	16	8	2	0	2
Housing units per fire unit	16,145	32,290.5	64,581	—	64,581

Sources: Seattle Fire Department Annual Report, 2022; Seattle 2035 Capital Facilities Appendix, 2020; BERK, 2023.

130th/145th Station Area

The 130th and 145th Station Area is in Area 2, and between SFD Stations 24, 31 and 39. These stations' units include two engines, one ladder, and one air unit. Growth in the station areas could increase demand. Currently there are 2,376 housing units in the direct station area.

Exhibit 3.11-18. 130th/145th Station Area Fire Stations, Units and Minimum Required Staff

Stations	Engines (4 Staff Per shift)	Ladders (4 Staff Per Shift)	Medic (2 Staff Per Shift)	Aid (2 Staff Per Shift)	Other Apparatus (~2 Staff Per Shift)
24, 39	2	1	0	0	1
Required Minimum staff per shift	8	4	0	0	2
Fire units per 1000 housing units	.1	.03	.03	0	.05
Housing units per fire unit	1,188	2,376	—	—	2,376

Sources: Seattle Fire Department Annual Report, 2022; Seattle 2035 Capital Facilities Appendix, 2020; BERK, 2023.

Area 3

Area 3 includes Queen Anne, Magnolia, and part of Ballard's business district. The four stations within this subarea do not have any medic units or aid units and are therefore highly dependent on utilizing fire specific units and personnel for aid and medic calls or on stations elsewhere in the city. There are 36,514 housing units in this area. A large percentage of Area 3 is dedicated to non-housing uses such as commercial, industrial, and parks land. SFD staff has identified the topography of this subarea combined with the lack of more nimble fire and aid apparatuses as limiting factors on response times and levels of service (Haskell, McAuslan, 2023). Station 3 at Fisherman's Terminal houses Fire Boat Chief Seattle as well as Fireboat 1 that are dispatched to marine fires on the freshwater side of the Ballard's Hiram M. Chittenden Locks. See **Exhibit 3.11-19** for stations, equipment, and staffing.

Exhibit 3.11-19. Stations and Fire Units in Area 3

Stations	Engines (4 Staff Per shift)	Ladders (4 Staff Per Shift)	Medic (2 Staff Per Shift)	Aid (2 Staff Per Shift)	Other Apparatus (~2 Staff Per Shift)
3, 8, 20, 41	3	1	0	0	2
Required Minimum staff per shift	12	4	0	0	2
Housing units per fire unit	12,171	36,514	—	—	18,257

Sources: Seattle Fire Department Annual Report, 2022; Seattle 2035 Capital Facilities Appendix, 2020; BERK, 2023.

Area 4

Downtown Seattle has three fire stations as well as Seattle Fire Headquarters. Station 5 is home to two fire boats and a rescue boat that are dispatched to offshore emergencies within Puget

Sound. The stations also have the highest number of aid units with two full-time and two peak hour units. There are no medical units within this subarea but Medic One is located at Harborview Hospital and can easily be dispatched to Area 4. Seattle Fire Headquarters is also home to the Health One program. Health One is an integrated health response unit that can respond to physical or mental health crises and provides social services to those in distress. This unit is staffed by two firefighters and social workers and includes three truck units.

Most of the land area is dedicated to major institutions, commercial properties, and multifamily dwellings. The estimated 51,611 multifamily housing units that make up this area have much stricter fire codes than the estimated 451 single family homes and typically require more aid dispatches than fire dispatches. See **Exhibit 3.11-20** for stations, equipment, and staffing.

Exhibit 3.11-20. Stations and Fire Units in Area 4

Stations	Engines (4 Staff Per shift)	Ladders (4 Staff Per Shift)	Medic (2 Staff Per Shift)	Aid (2 Staff Per Shift)	Other Apparatus (~2 Staff Per Shift; 3 for Health One*)
2, 5, 10, Headquarters	3	2	0	4	6
Required Minimum staff per shift	12	8	0	8	15
Housing units per fire unit	17,354	26,031	—	13,015.5	8,677

*Health one is only staffed Monday-Friday during daytime hours rather than the traditional four shift schedule.
Sources: Seattle Fire Department Annual Report, 2022; Seattle 2035 Capital Facilities Appendix, 2020; BERK, 2023.

Area 5

The central east study area has four fire stations as well as Medic One based in the Harborview Medical Center on First Hill. This area is 64% residential by area with an estimated 12,445 single family units and 57,725 multifamily units. Medic One houses the Battalion 3 vehicle as well as three medic units. The area's aid unit as well as the Battalion 2 vehicle are based at Capitol Hill Station. There is also the SFD Communications Van based at Roanoke Station and the HOSE34 hose and foam unit at Madison Park Station. See **Exhibit 3.11-21** for stations, equipment, staffing, and ratios of fire units to dwelling units.

Exhibit 3.11-21. Stations and Fire Units in Area 5

Stations	Engines (4 Staff Per shift)	Ladders (4 Staff Per Shift)	Medic (2 Staff Per Shift)	Aid (2 Staff Per Shift)	Other Apparatus (~2 Staff Per Shift)
6, 22, 25, 34, MED ONE	4	2	3	1	3
Required Minimum staff per shift	16	8	6	2	6
Housing units per fire unit	17,543	35,085	23,390	70,170	23,390

Source: Seattle Fire Department Annual Report, 2022; Seattle 2035 Capital Facilities Appendix, 2020; BERK, 2023.

Area 6

The West Seattle study area contains four stations serving an estimated 21,595 multi-family housing units and 24,905 single-family units. This subarea is also the second largest by acreage and has no aid units. Like in other subareas and station areas, existing units have been operating outside of the intended use in order to meet SFD's level of service standard and response time standard. These stations have benefited from the additional units being relocated within and near the study area. One Ladder unit was placed at West Seattle Station and a medic unit was placed in Area 7 to serve the West Seattle Bridge Closure. Both movements were originally temporary but were later made permanent by Seattle City Council. See **Exhibit 3.11-22** for stations, equipment, staffing, and ratios of fire units to dwelling units.

Exhibit 3.11-22. Stations and Fire Units in Area 6

Stations	Engines (4 Staff Per shift)	Ladders (4 Staff Per Shift)	Medic (2 Staff Per Shift)	Aid (2 Staff Per Shift)	Other Apparatus (~2 Staff Per Shift)
11, 29, 32, 37	4	2	1	0	1
Required Minimum staff per shift	16	8	2	0	2
Housing units per fire unit	11,625	23,250	46,500	—	46,500

Source: Seattle Fire Department Annual Report, 2022; Seattle 2035 Capital Facilities Appendix, 2020; BERK, 2023.

Area 7

The Greater Duwamish MIC, Georgetown, and South areas are supported by four fire stations in South Park, SoDo, Delridge/Harbor Island, and Georgetown. See **Exhibit 3.11-23**. This is a predominantly industrial area with unique apparatuses to support industrial uses. Examples include SFDs Rescue One Technical Rescue Team which include DECON1 and REHAB1 apparatuses. An additional medic unit was moved to Station 26 in South Park in response to the West Seattle Bridge closure and now permanently supports the ~2,287 dwellings in the area.

Exhibit 3.11-23. Stations and Fire Units in Area 7

Stations	Engines (4 Staff Per shift)	Ladders (4 Staff Per Shift)	Medic (2 Staff Per Shift)	Aid (2 Staff Per Shift)	Other Apparatus (~2 Staff Per Shift)
14, 26, 27, 36	3	1	1	1	2
Required Minimum staff per shift	12	4	2	2	4
Housing units per fire unit*	762	2,287	2,287	2,287	1,143.5

Source: Seattle Fire Department Annual Report, 2022; Seattle 2035 Capital Facilities Appendix, 2020; BERK, 2023.
* Note: this is a predominantly industrial area and its units reflect the needs of industrial firefighting rather than residential firefighting needs—additional assessment of unit needs in **Exhibit 3.11-40**.

Area 8

The Southeast Seattle Subarea is serviced by four fire units and runs from I-90 to Rainier Beach East of I-5. These fire units service about 22,183 single family units and 17,521 multifamily units. This subarea takes up most of the land area within Fire Battalion 5 jurisdiction and none of the four stations have an aid car. The Mount Baker Station does house one of SFDs AIR units to provide supplemental breathing equipment for fire calls and Station 28 in the Rainier Valley houses Medic28 which provides life support dispatches.

Exhibit 3.11-24. Stations and Fire Units in Area 8

Stations	Engines (4 Staff Per shift)	Ladders (4 Staff Per Shift)	Medic (2 Staff Per Shift)	Aid (2 Staff Per Shift)	Other Apparatus (~2 Staff Per Shift)
13, 28, 30, 33	4	1	1	0	2
Required Minimum staff per shift	12	4	2	0	4
Housing units per fire unit	9,926	39,704	39,704	—	19,852

Source: Seattle Fire Department Annual Report, 2022; Seattle 2035 Capital Facilities Appendix, 2020; BERK, 2023.

Parks

Information about open space and recreation was collected from Seattle Parks and Recreation (SPR) and the Seattle Parks District. Plans and studies referenced include system wide plans particularly those that guide the location and use of parks, trails, and centers serving the broader public:

- Seattle Parks and Recreation Strategic Plan (2020),
- Seattle Parks and Recreation 2022-2024 Action Plan (2022),
- Parks and Open Space Plan (POS) (2017),
- Seattle Shoreline Master Program (2015),

Seattle Comprehensive Plan (2015). These plans set levels of service offered to Seattle community members today and in the long term. The City is in the process of updating its POS Plan by 2024 in parallel with the One Seattle Plan Update.

Planning Framework

This section summarizes the policies and strategies of the City's plans that guide the provision of facilities and access to parks and shorelines.

Parks & Recreation Strategic Plan (2020)

The strategic plan sets a direction for the 12 year period 2020-2032, recognizing the rapid resident and employment growth of the 2015-2020 period and lack of equity. The vision and key strategies are under five key elements:

- **Pathway to Equity:** Seattle Parks and Recreation envisions programs, policies, and funding that create equitable outcomes, as well as strategies and actions that show measurable results toward our vision of healthy people, a healthy environment, and strong communities.
  - Steps to equity include: (1) developing an equity and engagement plan to implement equity goals, (2 and 6) developing an equity scorecard and map for resource allocation and planning and department performance, (3) revamping Race and Social Justice Initiative Outcomes, (4) training Seattle Parks and Recreation staff on pathway to equity, (5) conducting robust and culturally responsive engagement.
- **Healthy People:** Healthy people are active and moving around, feel safe and welcomed in public spaces across the city, have access to affordable, fresh food, and practice healthy habits that prevent disease and enhance physical and mental well-being.
  - In summary, nine implementing strategies address: (1) access to parks and recreation to all ages, (2) universal design, (3) quality spaces and facilities, (4) information about health and activity, (5) accessible public space and/or high quality recreation programs within a 10-minute walk of all residents, (6) increasing connection to nature for underserved communities, (7) improving equity in design and placement of community centers, (8) provide multifunctional spaces, and (9) increasing resilience of urban food system and access to fresh food.
- **Healthy Environment:** Seattle becomes a national leader in mitigating climate change impacts, stewarding and protecting our urban forests and natural spaces, promoting environmental responsibility and environmental justice, and building resilient infrastructure.
  - Ten strategies include in summary: (1) managing water resources through conservation and landscaping, (2) reducing waste, (3) creating a carbon-neutral park system, (4) develop new target for urban forest goal, (5) preserve parkland and open space, (6) providing a year-round system to respond to extreme climate events (heat, smoke), (7) improving connectivity, (8) increase alternative energy and technologies, (9) program and events for natural environment appreciation, (10) acquire land responsibly focusing on urban centers and underserved areas.
- **Strong Communities:** A strong Seattle community affords universal access to housing, living-wage jobs, education, and safe spaces to congregate and forge social connections. Children have support for success in school and in life, adults have access to employment and economic opportunity, and all ages feel part of a connected, vibrant city.
  - Eleven strategies include: (1) extended academic enrichment opportunities, (2) support childcare and programming, (3) increase free programming and streamline registration, (4) level grant programs and build capacity in underserved areas, (5) improve safety at

parks, (6) address homelessness through parks-based job-training and respectful cleaning of unsanctioned encampments, (7) bringing people together at events, (8) increase communication and outreach about programs, (9) reexamine partnerships and strengthen volunteer programs, (10) enhance economic opportunities through apprenticeships and green economy employment, and (11) increase cleanliness and safety of public restrooms.

- **Organizational Excellence:** The City of Seattle is managed by a world-class local government with a high-quality, well-trained workforce that operates with a focus on excellence and professionalism, collaborates with community and partners, equitably delivers essential services, adapts to changing best practices, and embraces new technology and innovative ideas.
  - In summary, the ten strategies: (1) develop and implement an equity strategy, (2) seek national accreditation, (3) have an appropriately sized workforce, (4) invest in training, (5) update systems and technology, (6) have ongoing engagement of vulnerable populations, (7) advance innovation, (8) collaborate with public and private partners to address livability, affordability, homelessness, and the environment, (9) address preventative maintenance, and (10) have a new structure to advisory committees and maximize engagement opportunities.

Seattle Parks & Recreation 2022-2024 Action Plan

After a pivot to pandemic response in 2020, in 2021 Seattle Parks and Recreation sought to engage with communities and develop short-term budget and priorities and operational goals. This action planning work focused on addressing four parallel crises within the city and to Seattle Parks and Recreation services:

- Public Health and Well Being
- Racial Equity
- Economic Recovery
- Impacts of Climate Change

The actions and goals identified within the 2022-2024 Action Plan highlight how Seattle Parks and Recreation intends to ~~move~~ address each of the immediate crises above by making specific progress on the five key elements identified in the Park & Recreation Strategic Plan.

Parks Open Space (POS) Plan (~~2017~~2024)

The City of Seattle POS Plan (~~2017~~2024) includes five major goals:

- **Goal 1:** Provide a variety of outdoor and indoor spaces throughout the city for all people to play, learn, contemplate, and build community.
- **Goal 2:** Continue to provide opportunities for all people across Seattle to participate in a variety of recreational activities.
- **Goal 3:** Manage the city's park and recreation facilities to provide safe and welcoming places.

- **Goal 4:** Plan and maintain Seattle's parks and facilities to ~~accommodate~~ attract additional park users and visitors.
- **Goal 5:** Engage with community members ~~on parks and recreation plans, and~~to design and develop parks and facilities, that are based on the specific needs and cultures of the communities that the park is intended to serve.

Shoreline Master Program Public Access

The Comprehensive Plan includes shoreline access goals and policies that are considered part of the Shoreline Master Program. Selected goals and policies addressing shoreline access include a general goal to maximize physical and visual access, enhancing views, and promoting street ends.

> *LUG44 Maximize public access—both physical and visual—to Seattle's shorelines.*
>
> *LUG45 Preserve and enhance views of the shoreline and water from upland areas, where appropriate.*
>
> *LU238 Maintain standards and criteria for providing public access, except for lots developed for single-family residences, to achieve the following:*
>
> *1. linkages between shoreline public facilities via trails, paths, etc., that connect boating and other recreational facilities.*
> *2. visible signage at all publicly owned or controlled shorelines and all required public access on private property.*
> *3. development of bonuses or incentives for the development of public access on private property, if appropriate.*
> *4. provision of public access opportunities by public agencies such as the City, Port of Seattle, King County and the State at new shoreline facilities and encourage these agencies to provide similar opportunities in existing facilities.*
> *5. view and visual access from upland and waterfront lots.*
> *6. prioritize the operating requirements of water-dependent uses over preservation of views.*
> *7. protection and enhancement of views by limiting view blockage caused by off-premise signs and other signs.*
>
> *LU240 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 transportation in the shoreline.*

Level of Service (LOS)

The City of Seattle sets level of service (LOS) standards for open space and recreation across the City. The Seattle 2035 Comprehensive Plan states in policy P 1.2 "Provide a variety of parks and open space to serve the city's growing population consistent with the priorities and level-of-service standards identified in the City's Park Development Plan" now called the Parks and Open Space Plan (Seattle Parks and Recreation 2017).

The 2017 Parks and Open Space Plan includes level-of-service standard of 8 acres per 1,000 residents (Seattle Parks and Recreation 2017) which is no longer in effect as of May 2024. The assumption of 8 acres of park and recreation facilities per 1,000 residents is used ~~throughout this impacts analysis to~~to compare population demand for open space and recreation. See **Exhibit 3.11-25**. Seattle Parks and Recreation ~~has initiated a process to~~ updated and adopted a new Parks and Open Space Plan ~~by~~ in ~~March~~ May 2024. This update considers changes to the level-of-service standard. The 2024 Parks and Open Space Plan Update proposes to change the Level of Service (LOS) from an acres per 1,000 people standard to providing parks and park facilities within a 10-minute walk.

Exhibit 3.11-25. Seattle's Projected Population to Acres of City-owned Parkland Comparison

Year	Seattle's Population	Acres of Parkland (2017)	Acres/1,000 residents
2016	686,800	6,414 acres	9.34 acres/1,000 residents
2023	731,012 (projected)*	6,414 acres**	8.77 acres/1,000 residents
2035	806,800 (projected)*	6,454 acres (minimum)	8.00 acres/1,000 residents

Notes: *Assumption is that Seattle's population will increase by approximately 6,316 individuals annually.
** This model assumes parkland levels stay at the current acreage for comparison purposes. As noted below land acquisition is often opportunity driven, however SPR anticipates the acquisition of additional parkland before 2023 based on its prior history of acquisition and ongoing negotiating on several properties. The 2024 Parks and Open Space Plan update shows 6,478 acres as of 2024.
Source: Seattle POS Plan, 2017.

The POS plan also identified a long-term acquisition strategy for natural areas, and parks in a 5-minute walk in urban centers and areas outside urban centers with a 10-minute walk. See **Exhibit 3.11-26**.

Exhibit 3.11-26. Long-Term Acquisition Strategy

Strategy	Locations	
5-minute Walkability—Within Urban Centers	Aurora-Licton Springs	North Beacon Hill
	Bitter Lake	Columbia City
	Northgate	Othello
	Ballard	Rainier Beach
	First Hill	South Park
	Fremont	West Seattle Junction
	12th Avenue	Morgan Junction
	North Rainier	Westwood-Highland Park
Natural Area/Greenbelt Acquisition	200 + prioritized properties	
10-minute Walkability Outside Urban Centers Underserved	Georgetown neighborhood and Bitter Lake/Aurora area	

Source: Seattle POS Plan, 2017 and 2024.

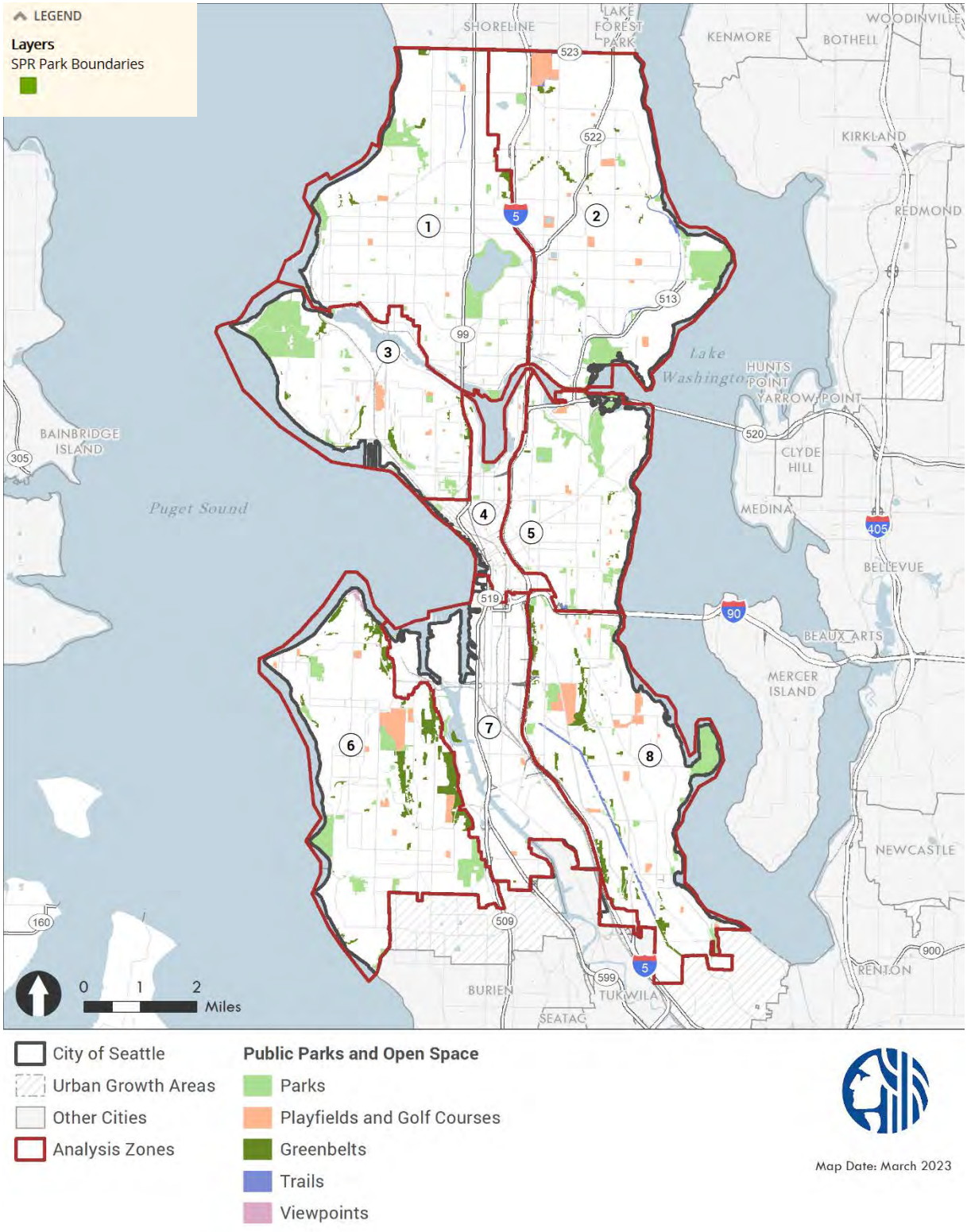
Current Conditions

Citywide

Seattle Parks and Recreation (SPR) manages a 6,478-acre park system with over 485 parks and natural areas. This system includes athletic fields, play areas, gardens, trails, facilities and community centers, swimming pools, education centers, golf course, and skateparks. The SPR system comprises about 12% of Seattle's land area.

The study area, the subareas, and the parks and recreation facilities available are identified in the map below (see **Exhibit 3.11-27**).

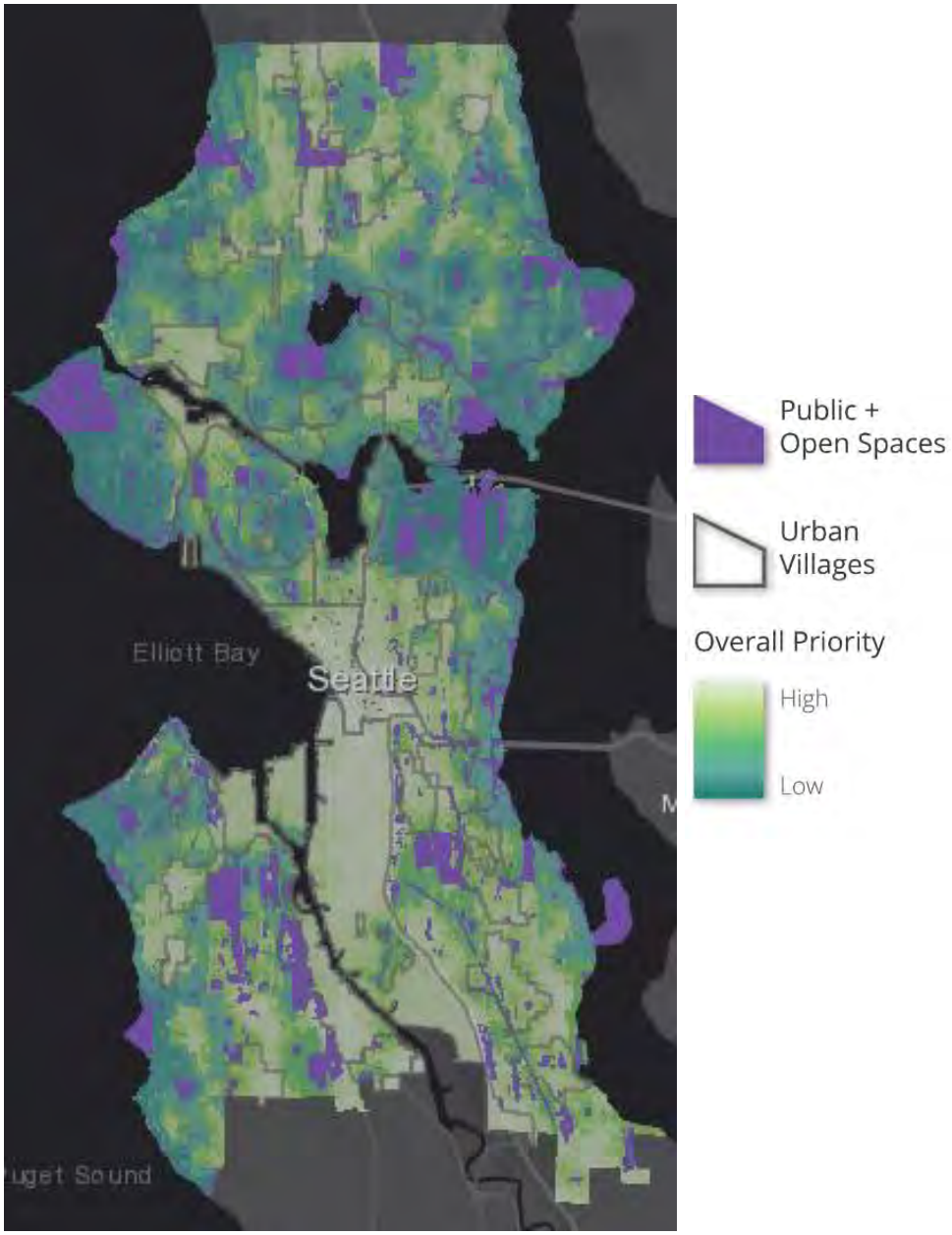
Exhibit 3.11-27. City and Study Area Parks and Recreation Facilities



Sources: Seattle POS Plan, 2017; BERK, 2023.

In 2020, OPCD developed an "Outside Citywide" map tool considering access to open spaces at city, county, state, and federal governments, special districts like schools and the Port, and other private space. Based on race and social equity, density and growth, and health outcomes, the City identified priority areas for public space provision. See **Exhibit 3.11-28**. Areas with poor access include many of those referenced in **Exhibit 3.11-26**. More notably, Ballard, Greenwood-Phinney Ridge, Aurora-Licton Springs, Lake City, Northgate, and Morgan Junction. The Greater Duwamish Manufacturing and Industrial Center (MIC) is also an area lacking parks and open space.

Exhibit 3.11-28. Outside Citywide Access—Public Space Priority Areas



Source: Seattle Parks and Recreation, 2020.

Analysis Areas

Maps of parkland by area are included in **Appendix I**. A summary of key park features by analysis area is provided below.

Area 1: NW Seattle

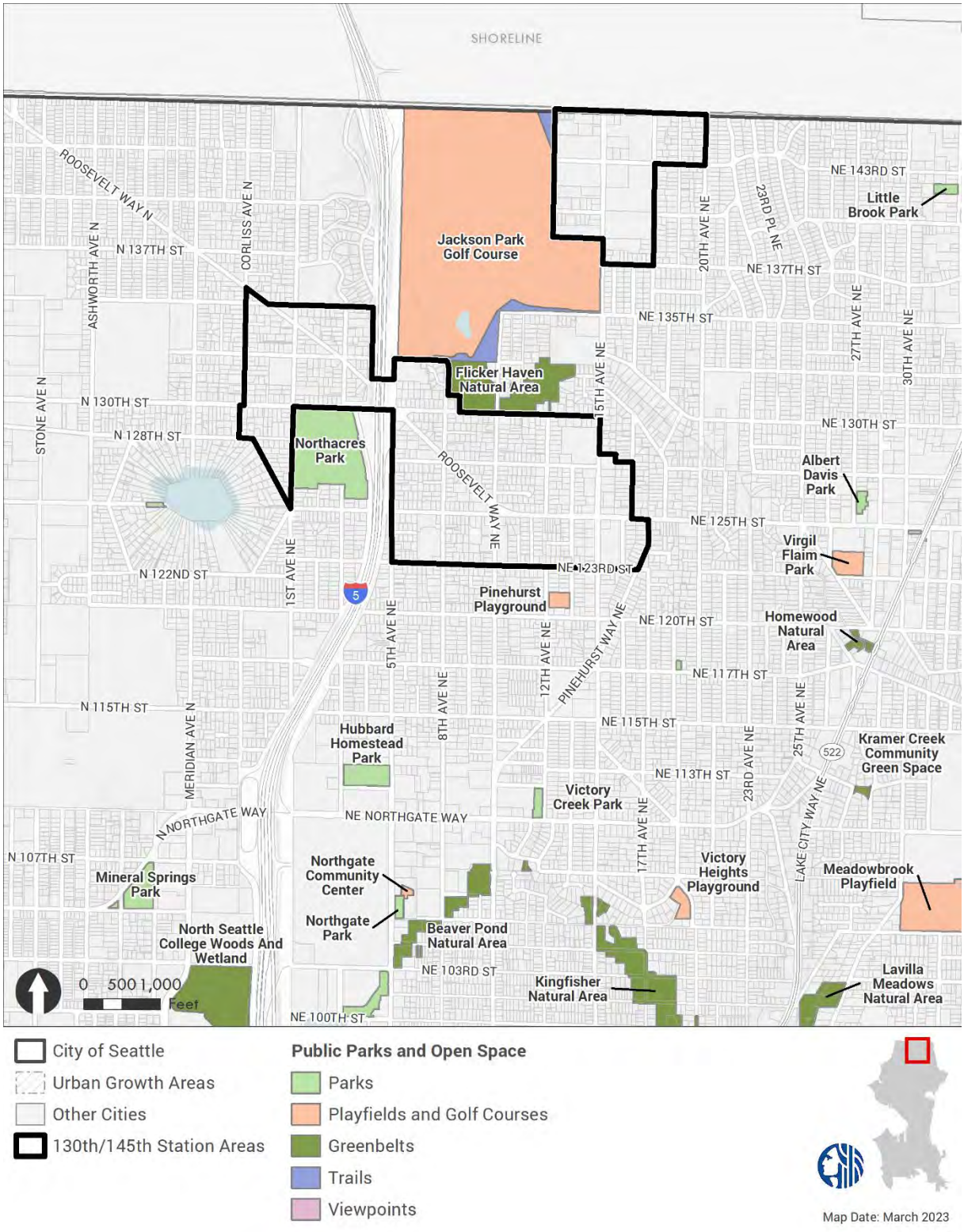
Major open spaces in Area 1 include: Carkeek and Golden Gardens along Puget Sound, as well as Greenlake and Woodland Park Zoo, Gas Works Parks as well as the Shilshole Bay Marina (Port of Seattle).

Area 2: NE Seattle

Major parks and open space in Area 2 include Jackson Park Golf Course, Warren G. Magnuson Park, the University of Washington east campus which includes a golf driving range, intramural fields and the Union Bay Natural Area, Ravenna Park, Maple Leaf Reservoir Park, Northeast Sports Complex—Nathan Hale High School (Seattle Public Schools), and others. Priority areas for public space include Northgate, Lake City, and NE 45th Street west of the University of Washington campus.

130th/145th Station Area. In the 130th/145th Station Area, the largest park and open space is Jackson Park Golf Course & Trail. Other parks in the area include Northacres Park, Licorice Fern Natural Area, Pinehurst Playground, Virgil Flaim Park, Albert Davis Park, Haller Lake Street End Park, Northwest Sports Complex (Ingraham High School—Seattle Public Schools) and others such as the North Seattle College Barton Woods wetland and campus landscape. The Evergreen Washelli Cemetery (private) is also located west of this area providing open space. Several P-Patches provide fresh food access and open space. See **Exhibit 3.11-29**.

Exhibit 3.11-29. 130th/145th Station Study Area Parks and Open Spaces



Source: City of Seattle 130th & 145th Street Station Area Background Report, 2021; BERK, 2023.

Area 3: Queen Anne/Magnolia

Area 3 includes Discovery Park, Interbay Golf Course and Athletic Field, West Seattle Playfield and Community Center, Myrtle Edwards Park, Magnolia Boulevard, Queen Anne Boulevard, Kinnear Park, David Rodgers Park, and Centennial Park (Port of Seattle). Priority areas for parks include the BINMIC area and some parts of the Uptown Urban Center.

Area 4: Downtown/Lake Union

Area 4 contains Lake Union Park, Denny Park, Cascade Playground, Olympic Sculpture Park, Victor Steinbrueck Park, Waterfront Park, City Hall Park, Hing Hay Park, Danny Woo Garden and Kobe Terrace, Occidental Square, various public plazas, Memorial Stadium (Seattle Public Schools) and Port of Seattle piers. Most of the Downtown Urban Center is an area of priority public space needs.

Area 5: Capitol Hill/Central District

Area 5 includes Washington Park and Arboretum, Interlaken Park, Volunteer Park, Cal Anderson Park, Garfield Playfield, Madrona Park, Leschi Park, Frink Park, Sam Smith Park, Judkins Park and Playfield, and Judge Charles M. Stokes Overlook, East Duwamish Greenbelt, among other small neighborhood parks. The west side of the First Hill/Capitol Hill Urban Center and part of the Madison-Miller and 23rd & Union-Jackson Urban Centers have areas less well served by parks; see **Exhibit 3.11-27**.

Area 6: West Seattle

Area 6 includes Lincoln Park, Alki Beach Park, Hamilton Viewpoint Park, Don Armeni Park, Schmitz Preserve Park, Alki Playground, West Seattle Golf Course, Camp Long, Me-Kwa-Mooks Park, Riverview Playfield, Westcrest Park, Roxhill Park, Southwest Athletic Complex (Seattle Chief Sealth International High School—Seattle Public Schools), Fauntleroy Park, Seola Park, and several natural areas and greenbelts along creeks and hillsides. The West Seattle Junction, Morgan Junction, and Westwood Highland Park are areas that could benefit from additional parks and open space.

Area 7: Duwamish

The Greater Duwamish MIC, Georgetown, and South Park areas in Area 7 have some shoreline access on Port of Seattle property and as well as parks, playfields and greenbelts such as Georgetown Playfield, Ruby Chow Park, Georgetown Urban Farm and Forest, South Park Playground, South Park Meadow, and Marra-Desimone Park. The South Park Urban Center and much of the MIC is considered a priority for public space.

Area 8: SE Seattle

Area 8 includes parks along the Lake Washington shoreline like Colman Park, Seward Park, Martha Washington Park, Pritchard Island Beach, as well as parks within the central residential area like Jefferson Park, Jefferson Golf Course, Maplewood Playfield, Chief Sealth Trail (Seattle City Light), Van Asselt Playground, Kubota Gardens, Lakeridge Park, Southeast Sports Complex (Rainier Beach High School—Seattle Public Schools) and other greenbelts. Priority locations for public access include areas abutting I-5 and Rainier Avenue South, as well as portions of the Mt. Baker/North Rainier, North Beacon Hill, Columbia City, Othello, and Rainier Beach Urban Centers.

Schools

The information about schools was collected from:

- Seattle Public Schools
- Seattle Preschool Program
- Washington Office of Superintendent of Public Instruction
- King County Assessor Parcel Records

Planning Framework

Seattle 2035

Seattle's Comprehensive Plan includes several goals related to education, including:

- ***Capital Investments & Schools:***

  CF 5.3 Partner with Seattle Public Schools to plan for expected growth in student population, explore opportunities to reduce the costs of developing new schools, encourage the siting of new school facilities in or near urban centers and villages, and make it easy for students and families to walk and bike to school.

  AC 4.4 Encourage the adaptive reuse of historic community structures, such as meeting halls, schools, and religious buildings, for uses that continue their role as neighborhood centers.

  AC 4.6 Encourage partnerships to use public and institutional spaces, such as parks, community centers, libraries, hospitals, schools, universities, and City-owned places, for arts, musicians, and culture.

  CW 4.6 Work with schools, higher education institutions, libraries, community centers, and arts and cultural agencies and organizations to link services into a seamless system that helps students stay in school, such as through collocation of services and joint use of facilities.

  CW 7.8 Encourage use of existing facilities and collocation of services, including joint use of schools and City and community facilities, to make services available in underserved areas and in Uran Center areas.

LU G3 Allow public facilities and small institutions to locate where they are generally compatible with the function, character, and scale of an area, even if some deviation from certain regulations is necessary.

- ***Access to Education, Recreation, & Cultural Access:***

  CW 4.1 Create equitable access to high-quality early-learning services, and support families so that their children are prepared for school.

  CW 4.9 Work with colleges, universities, other institutions of higher learning, and community-based organizations to promote lifelong learning opportunities and encourage the broadest possible access to libraries, community centers, schools, and other existing facilities throughout the city.

  CW 4.10 Work with schools, libraries, and other educational institutions, community-based organizations, businesses, labor unions, and other governments to develop strong educational and training programs that provide pathways to successful employment.

  AC G3 Improve access to arts and music education in all schools and outside the school setting so that students are prepared to be successful in school and life.

  P 1.9 Use cooperative agreements with Seattle Public Schools and other public agencies to provide access to open spaces they control.

  H 1.4 Remove barriers that prevent lower-income households from using rental assistance throughout Seattle, particularly in areas with frequent transit, schools, parks, and other amenities.

130th/145th Station Area Plan

The 130th/145th Station Area Plan includes several strategies related to education and schools:

Strategy 3.2 Consider partnerships to expand public access to private recreational facilities and gathering spaces associated with schools and faith communities.

Strategy 8.3 Connect key community destinations like parks, schools, and businesses with multimodal improvements to enhance neighborhood circulation.

Strategy 11.4 Share information with Seattle Public Schools about affordable housing developments to promote and market affordable housing to eligible families within the service area of local schools.

Current Conditions

Citywide

The Seattle School District serves the city as a whole with 103 schools, including:

- 63 Elementary Schools
- 10 K-8 Schools

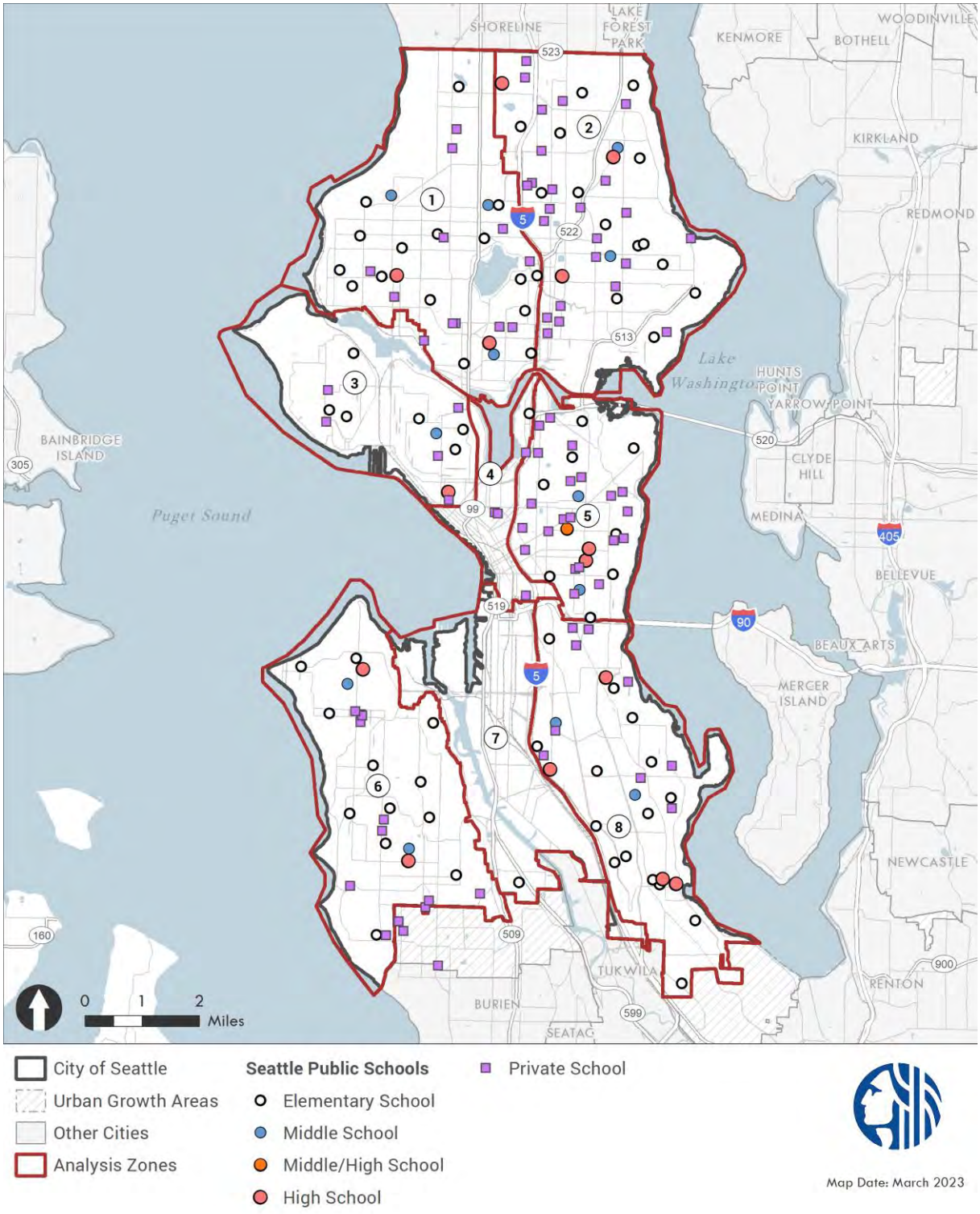
- 12 Middle Schools
- 18 High Schools (including Middle College, Interagency, South Lake, and Skills Center)

The Seattle School District employs 5,955 educators at school sites. There are currently about 23,691 elementary, 11,001 middle, and 15,364 high school students enrolled. The students are 46% white and 54% persons of color. The top languages spoken other than English include Spanish, Somali, Vietnamese, Chinese (Cantonese), Amharic, Oromo, Tigrinya, Chinese (Mandarin), Japanese, and Arabic (Seattle Public Schools 2022). The Seattle School District Administrative offices are in Area 7. Seattle Public Schools also hosts many pre-k programs in their facilities.

Private schools include secular and religious schools, found in every analysis area.

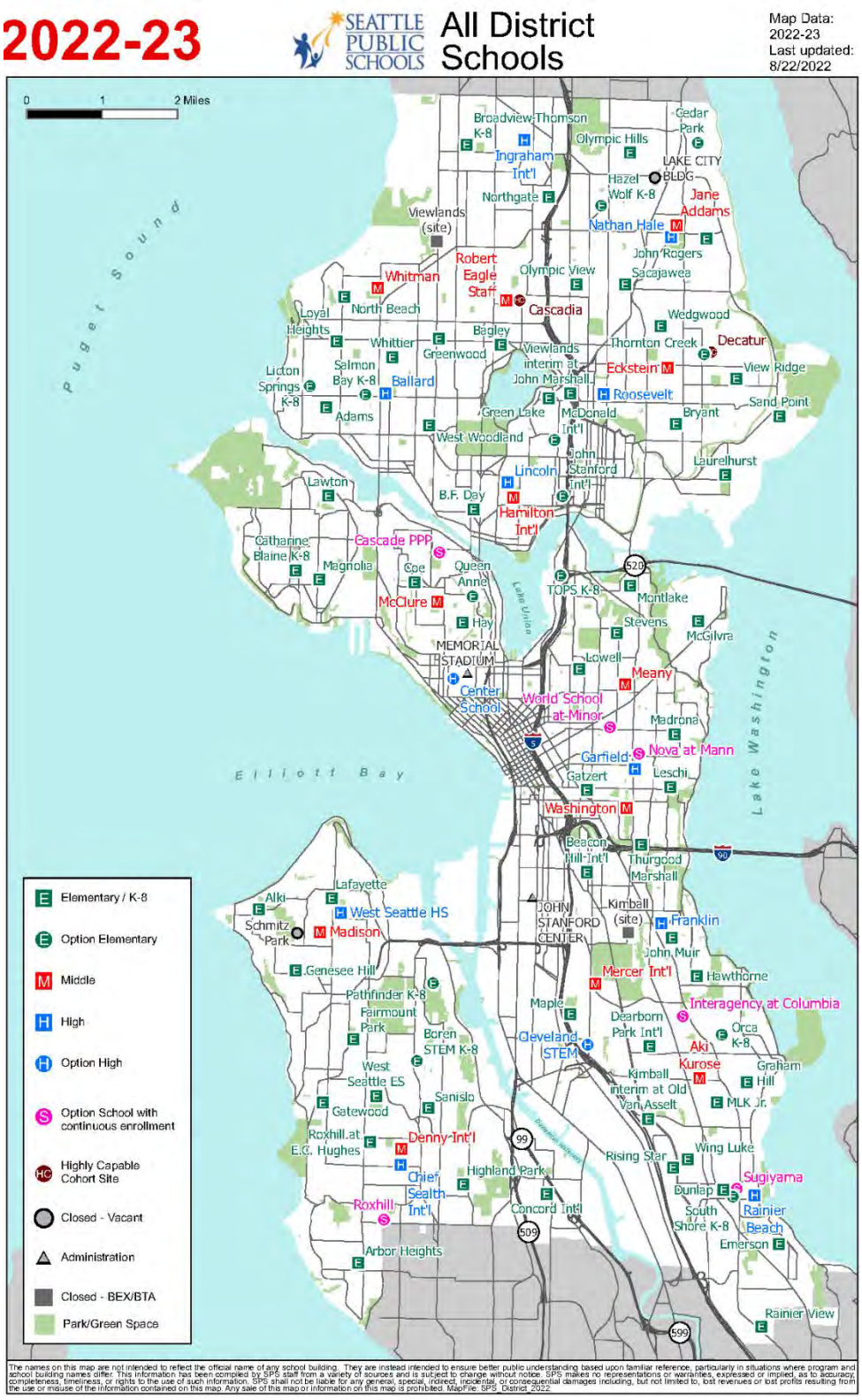
See **Exhibit 3.11-30** and **Exhibit 3.11-31**.

Exhibit 3.11-30. Public and Private Schools in City and Study Areas



Source: King County GIS, 2023; BERK, 2023.

Exhibit 3.11-31. Seattle Public Schools: All District Schools



Source: Seattle School District, 2022.

Capacity at each school and current enrollment is shown in **Exhibit 3.11-32**. Most schools' capacities are higher than current enrollment. In a few instances, capacity is less than enrollment which may require portables. Schools with capacities less than enrollment by more than 10 students include: Lincoln High School, Hazel Wolf K-8, Stevens Elementary School, and Graham Hill Elementary School.

Exhibit 3.11-32. Public Schools, Enrollment, and Capacity by Area

School Name	All Students (2022-23)	Operational Analysis Capacity (2022-2023)	Capital Projects for permanent capacity (2022-2025)
Area 1: NW Seattle			
Adams Elementary School	318	549	
B F Day Elementary School	355	423	
Ballard High School	1,555	1,805	
Broadview-Thomson K-8 School	519	661	
Cascadia Elementary	473	612	
Daniel Bagley Elementary School	322	503	
Green Lake Elementary School	324	387	
Greenwood Elementary School	322	345	
Hamilton International Middle School	927	978	
Licton Springs K-8	98	360	
Lincoln High School	1,632	1,600	X
Loyal Heights Elementary School	502	572	
North Beach Elementary School	340	387	
Robert Eagle Staff Middle School	677	1000	
Salmon Bay K-8 School	660	685	
Viewlands Elementary School	272	351	X
West Woodland Elementary School	398	643	
Whitman Middle School	681	1,033	
Whittier Elementary School	363	471	
Area 2: NE Seattle			
Bryant Elementary School	484	549	
Cedar Park Elementary School	204	283	
Eckstein Middle School	1,047	1,044	
Hazel Wolf K-8	725	658	
Ingraham High School	1,418	1796	
Jane Addams Middle School	885	1175	
John Rogers Elementary School	249	342	X
John Stanford International School	429	437	
Laurelhurst Elementary School	273	369	
McDonald International School	459	471	
Nathan Hale High School	1,081	1,225	
Northgate Elementary School	191	252	X
Olympic Hills Elementary School	453	525	
Olympic View Elementary School	361	458	

School Name	All Students (2022-23)	Operational Analysis Capacity (2022-2023)	Capital Projects for permanent capacity (2022-2025)
Roosevelt High School	1,502	1765	Funding for design only
Sacajawea Elementary School	195	274	X
Sand Point Elementary	160	276	
Stephen Decatur Elementary School	209	291	
Thornton Creek Elementary School	420	586	
View Ridge Elementary School	302	538	
Wedgwood Elementary School	354	478	
Area 3: Queen Anne/Magnolia			
Cascade Parent Partnership Program (North Queen Anne School)	349	unk	X
Catharine Blaine K-8 School	452	749	
Frantz Coe Elementary School	454	503	
John Hay Elementary School	270	477	
Lawton Elementary School	336	479	
Magnolia Elementary School	320	460	
McClure Middle School	428	630	
Queen Anne Elementary	205	500	
The Center School	230	300	
Area 5: Capitol Hill/Central District			
Bailey Gatzert Elementary School	311	336	
Edmonds S. Meany Middle School	512	850	
Garfield High School	1,577	1,619	
Leschi Elementary School	276	330	X
Lowell Elementary School	322	333	
Madrona K-5 School	226	390	
McGilvra Elementary School	223	278	
Montlake Elementary School	184	251	X
Nova High School	285	400	
Seattle World School	179	360	
Stevens Elementary School	176	283	
Tops K-8 School	478	446	
Washington Middle School	555	794	
Area 6: West Seattle			
Alki Elementary School	295	336	X
Arbor Heights Elementary School	487	635	
Chief Sealth International High School	1,178	1455	
David T. Denny International Middle School	816	949	
Fairmount Park Elementary School	413	516	
Gatewood Elementary School	372	464	
Genesee Hill Elementary	523	664	
Highland Park Elementary School	289	306	
Lafayette Elementary School	469	497	
Louisa Boren STEM K-8	468	576	

School Name	All Students (2022-23)	Operational Analysis Capacity (2022-2023)	Capital Projects for permanent capacity (2022-2025)
Madison Middle School	984	1190	X
Pathfinder K-8 School	465	460	
Roxhill Elementary School	243	336	
Sanislo Elementary School	175	264	
West Seattle Elementary School	347	432	X
West Seattle High School	1,301	1357	
Area 7: Duwamish			
Concord International School	291	333	
Area 8: SE Seattle			
Aki Kurose Middle School	773	900	Funding for design only
Alan T. Sugiyama High School	31	250	
Beacon Hill International School	344	407	
Cleveland High School STEM	846	965	
Dearborn Park International School	304	354	
Dunlap Elementary School	242	303	
Emerson Elementary School	307	396	
Franklin High School	1,174	1,398	
Graham Hill Elementary School	268	391	
Hawthorne Elementary School	364	351	
John Muir Elementary School	318	342	X
Kimball Elementary School	379	408	X
Maple Elementary School	434	468	
Martin Luther King Jr. Elementary School	239	336	
Mercer International Middle School	854	1296	X
Orca K-8 School	398	456	
Rainier Beach High School	791	1,088	X
Rainier View Elementary School	240	270	
Rising Star Elementary School	309	480	
South Shore PK-8 School	558	705	
Thurgood Marshall Elementary	464	543	
Wing Luke Elementary School	282	500	
Citywide			
Bridges Transition	128	n/a	
Interagency Detention School	18	n/a	
Interagency Open Doors	84	n/a	
Interagency Programs	194	n/a	
Middle College High School	96	n/a	
Private School Services	180	n/a	
Total	**50,222**	**61,302**	

Sources: Seattle Public Schools 2023; OSPI Student Information, 2023.

Seattle Preschool Program

The Seattle Preschool Program (SPP) is levy-funded and provides an evidence-based preschool program through the Seattle Department of Education and Early Learning (DEEL). It is conducted in partnership with a network of preschool providers throughout the city, including both community-based providers and Seattle Public Schools. About 87 program sites were in use in 2022, with 1,959 students enrolled. About 77% of the students are non-white, and 105 of the seats are for children with individual education plans. About 22 classrooms are for dual language learners. (Seattle Department of Education & Early Learning 2022)

Analysis Areas

Public and private schools are identified in each area below and on maps in **Appendix I**.

Area 1: NW Seattle

The following schools are in Northwest Seattle:

- 19 public schools with 14 elementary (K-5 and K-8) schools, 3 middle schools, and 2 high schools
- 12 private schools serving various grade levels with most religious (Catholic, Jewish) and some secular (language-based, Montessori, independent)

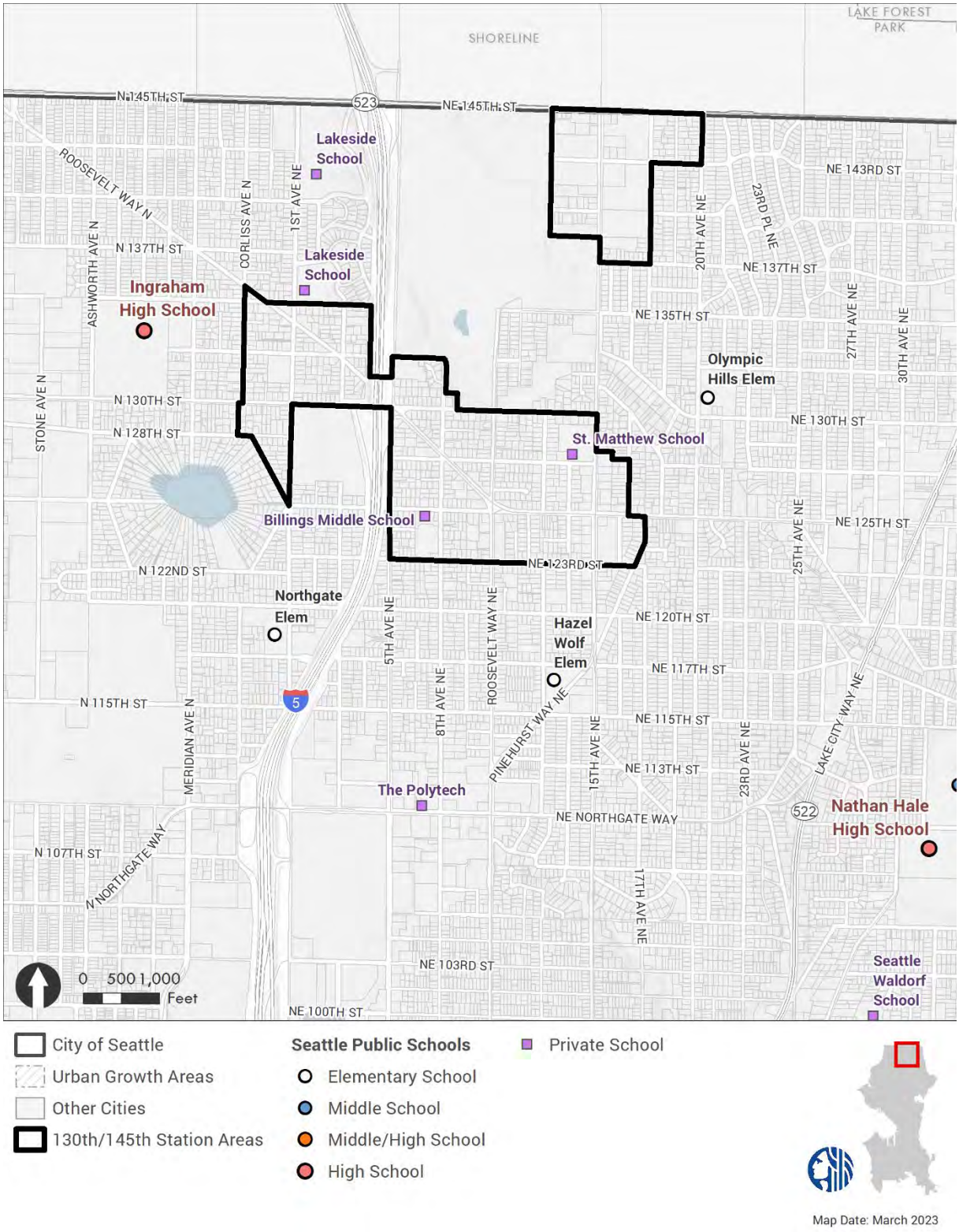
Area 2: NE Seattle

The following schools are located in Northeast Seattle:

- 21 public schools with 16 elementary (K-5 and K-8) schools, 2 middle schools, and 3 high schools
- 23 private schools serving various grade levels with most secular (language-based, Montessori, independent) and several religious (Catholic, Christian)

130th/145th Station Area. The station areas at 130th and 145th are served by several public schools (Hazel Wolf, James Baldwin, and Olympic Hills Elementary Schools; Jane Addams Middle School, and Nathan Hale High Schools). Nearby private schools include Lakeside School (middle and upper schools), Billings Middle School, and Saint Matthew School. See **Exhibit 3.11-33**.

Exhibit 3.11-33. Schools in Vicinity of 130th/145th Station Area



Source: King County GIS, 2023; BERK, 2023.

Area 3: Queen Anne/Magnolia

Area 3 includes the Magnolia and Interbay areas. The following schools are located in Area 3:

- 9 public schools with 6 elementary (K-5 and K-8), 1 middle school, 1 special high school (Center School) and 1 special program (Cascade Parent Partnership Program, K-8, individual academic programs)
- 6 private schools, religious (Catholic) and secular (language-based and independent)

Area 4: Downtown/Lake Union

Area 4 includes Downtown and South Lake Union. It has 4 independent private schools.

Area 5: Capitol Hill/Central District

Area 5 includes the Capitol Hill and Montlake areas. The following schools are located in Area 5:

- 13 public schools with 8 elementary (K-5 and K-8), 1 middle school, 1 high school and 1 middle/high school focused on languages (Seattle World School)
- 6 private schools, religious (Catholic) and secular (language-based and independent)

Area 6: West Seattle

The following schools are located in West Seattle:

- 16 public schools, with 12 elementary, 2 middle schools, 2 high schools
- 9 private schools, religious (Catholic, Christian) and secular (Montessori, independent)

Area 7: Duwamish

Area 7 includes one residential community, South Park. There is one elementary school, Concord Elementary, located in Area 7.

Area 8: SE Seattle

Southeast Seattle includes Beacon Hill, Rainier Valley, and other neighborhoods in Southeast Seattle. The following schools are located in Area 8:

- 22 public schools, with 16 elementary, 2 middle schools, 4 high schools
- 10 private schools, religious (Catholic, Christian, Jewish) and secular (gender-based, independent)

Solid Waste

Seattle Public Utilities has developed the 2022 Solid Waste Plan Update. The plan contains information needed for forecasting future solid waste needs as well as information on landfill contracts, hauling contracts, capital facilities, and staffing. Currently the City of Seattle offers three streams of solid waste to commercial, residential, and self-haul customers. These three streams are garbage, compost, and recycling. Garbage is processed through City operated transfer stations and sent to landfills for long term storage in the Columbia Ridge Regional Landfill and other facilities outside of Seattle. Recycling and compost streams are processed at materials reclamation facilities (MRFs) operated by specific haulers and are sent to one of many facilities depending on the solid waste collection contractor that collected the material, and the stream that was collected. Seattle Public Utilities promotes recycling and composting by offering these services at a discount when compared to garbage collection, and limits contamination of recycling and compost through tags on receptacles and robust sorting at processing facilities.

Citywide

Inventory of Current Facilities

Seattle's Public Utilities' Solid Waste Program encompasses all residents and business owners in Seattle. The program operates a number of capital facilities seen in **Exhibit 3.11-34**, **Exhibit 3.11-35**, and **Exhibit 3.11-36**. Facilities within the City of Seattle are used to sort commercial and residential garbage and recycling as well as hazardous materials. Other facilities outside of Seattle city limits are used for food and yard waste processing as well as landfilling.

Exhibit 3.11-34. Seattle Solid Waste Program, Public Facilities—Garbage Collection

City-Owned Permitted Facilities in Seattle: Operator	Facility	Type
Seattle Public Utilities	North Transfer Station	▪ City-contracted residential garbage and food and yard waste collection transfer ▪ City-contracted commercial garbage and food and yard collection transfer ▪ Self-haul garbage, yard and wood waste, recycling, and reuse
Seattle Public Utilities	South Transfer Station	▪ City-contracted residential garbage and food and yard waste collection transfer ▪ City-contracted commercial garbage and food and yard collection transfer ▪ Self-haul garbage, yard and wood waste, recycling, and reuse
Seattle Public Utilities	North Seattle Household Hazardous Waste Disposal Facility	▪ Self-haul facility for hazardous materials ▪ Batteries, motor oil, cleaning products, paint, light bulbs, and other hazardous materials
Seattle Public Facilities	South Seattle Household Hazardous Waste Disposal Facility	▪ Self-haul facility for hazardous materials ▪ Batteries, motor oil, cleaning products, paint, light bulbs, and other hazardous materials

Source: 2022 Solid Waste Plan Update, 2022.

Exhibit 3.11-35 Seattle Solid Waste Program, Private Facilities—Recycling Collection

Privately-Owned Permitted Facilities in Seattle: Operator	Facility	Type
Recology	MRF	▪ Recycling processing
Republic Services	Rabanco Recycling MRF	▪ Recycling processing ▪ Intermodal transfer of construction and demolition debris to long-haul disposal
Seadrunar	Seadrunar Recycling	▪ Recycling processing
Waste Connections	Northwest Container Service Intermodal Facility	▪ Intermodal transfer of construction and demolition debris to long-haul disposal
Waste Management Inc.	Eastmont Transfer Station	▪ Some garbage transfer. ▪ Some food and yard waste transfer ▪ Construction and demolition debris transfer
Waste Management Inc.	Alaska Reload Facility	▪ Contaminated soil transfer
Waste Management Inc.	Biomedical Waste Facility	▪ Biomedical treatment
Union Pacific Railroad (used by Waste Management Inc.)	Argo Rail Yard	▪ Intermodal transfer of construction and demolition debris and garbage to long-haul disposal

Source: 2022 Solid Waste Plan Update, 2022.

Exhibit 3.11-36 Seattle Solid Waste Program, Private Facilities—Compost Collection

Privately-Owned Permitted Facilities Outside of Seattle: Operator	Facility	Type
Cedar Grove	Cedar Grove Everett	▪ Food and yard waste composting
Cedar Grove	Cedar Grove Maple Valley	▪ Food and yard waste composting
Waste Connections	Finley Buttes Landfill	▪ Construction and demolition landfill disposal
Waste Management Inc.	Columbia Ridge Regional Landfill	▪ Landfill disposal
Republic Services	Roosevelt Landfill (Roosevelt, WA)	▪ Construction and demolition landfill disposal

Source: 2022 Solid Waste Plan Update, 2022.

Transfer Stations, MRFs, & Compost Processing Facilities

City-contracted collectors take the garbage and food and yard waste that they collect to City-owned transfer stations. They take residential recyclables to City-contracted MRFs, where materials are sorted, separated, and prepared for sale. The two Seattle Transfer stations also accept a small volume of recyclables only from self-haul customers. Occasionally, garbage and yard waste are transferred to contracted transfer facilities.

These facilities receive waste, consolidate it into loads, and send them to their next destination. Garbage is compressed and sealed into 40-foot intermodal containers and taken by truck to the Union Pacific Argo Rail Yard where the containers are taken to Columbia Ridge Landfill in Gilliam County, Oregon. As of the 2022 Seattle Solid Waste Plan Update's publication, the Columbia Ridge Landfill has an estimate 143 years of permitted capacity available and the

contract with Waste Management Inc. provides alternative transportation options and disposal options if the rail lines become temporarily unavailable.

Compostable Materials are also loaded into these containers and taken to compost processing facilities owned by either Cedar Grove or Lenz Enterprises. Cedar Grove processes roughly 30% of Seattle's compostable material at both its Everett and Maple Valley facilities and Lenz Enterprises processes the remaining 70% at its Stanwood facility.

Self-haul recyclables that are accepted at the transfer stations are taken to the Rabanco MRF for processing and marketing recyclable material.

Scale operators, floor staff, equipment operators, maintenance laborers, and administrative employees work within the transfer stations to process commercial, residential, and self-haul solid waste.

Residential, Commercial, and Public Place Solid Waste Collection

Residential Customers do not select their waste hauler as Seattle Public Utilities residential and public place solid waste collection is determined by location and is the result of a decennial competitive bid process. These boundaries ensure a high level of service, competitive rates, and efficiency in collection throughout the city. A map of these boundaries can be found in **Exhibit 3.11-37**.

Commercial customers do not select their garbage collection but do have the ability to contract with third-party or private haulers for their recycling and composting. These haulers collect both SPU approved recyclables as well as additional materials depending on the needs of the customer.

The roughly 1,000 public place litter cans throughout Seattle are collected by contracted commercial collectors on a regular schedule and follow the same boundaries as commercial and residential solid waste. These receptacles are in commercial cores throughout the city.

Emergency Solid Waste Management

The City of Seattle provides guidelines for debris removal and processing after a debris-generating disaster in its Disaster Debris Management Plan, Emergency Operations Plan, and Continuity of Operations Plan. These plans ensure that debris generated is collected and disposed of in case of an emergency as well as ensuring that SPU will respond to emergencies and restore infrastructure and systems effected by emergencies.

Exhibit 3.11-37 Solid Waste Service Zones by Contractor—Residential and Commercial



Source: 2022 Solid Waste Plan Update, 2022.

Waste Generation Trends

Between the years 2000 and 2020, residential waste generation accounted for 38% of all non-construction and demolition waste generated in the City of Seattle per data in the 2022 Solid Waste Plan Update. About 10% of the total tonnage was generated by multi-family buildings and 28% were generated by single family households. Commercial waste generation accounted for 49% of the total waste generation during this time and 14% were attributed to self-haul customers at transfer stations. These values can be found in **Exhibit 3.11-38** and will be used in the impacts section to determine how solid waste generation will likely change over time.

Exhibit 3.11-38. Estimated Total Waste Generation by Non-C&D Customer Type, 2000–2020 (tons)

Year	Commercial	Single-Family Residential	Multi-Family Residential	Self-Haul	Total
2000	391,406	208,468	70,944	123,024	793,842
2001	377,927	211,982	68,611	124,453	782,974
2002	366,224	206,474	70,144	125,620	768,462
2003	339,844	205,748	72,149	123,597	741,337
2004	375,739	209,132	72,640	122,835	780,346
2005	385,093	208,675	72,325	124,364	790,456
2006	416,564	216,946	75,545	127,444	836,499
2007	418,979	220,128	77,108	132,545	848,759
2008	390,267	213,889	74,223	111,309	789,688
2009	335,992	215,015	70,524	97,893	719,424
2010	345,692	216,484	70,675	91,618	724,469
2011	351,214	212,861	70,145	81,776	715,996
2012	347,673	211,030	74,549	80,568	713,821
2013	356,480	206,603	76,960	84,341	724,385
2014	369,407	206,992	80,189	64,681	721,269
2015	370,037	204,397	78,278	67,993	720,705
2016	385,846	207,804	80,478	73,923	748,051
2017	398,422	213,709	77,150	111,098	800,380
2018	384,139	210,289	78,245	112,550	785,223
2019	355,453	207,538	80,241	114,234	757,466
2020	286,036	232,038	83,701	109,844	711,619
Average	**368,973**	**211,724**	**105,034**	**74,992**	**760,722**
Sum	**7,748,434**	**4,446,202**	**1,574,824**	**2,205,710**	**15,975,171**
% of Total	**48%**	**28%**	**10%**	**14%**	

Source: SPU 2020 Annual Waste Prevention & Recycling Report, 2021.

3.11.2 Impacts

Impacts Common to All Alternatives

Police

Growth in housing and jobs is expected to occur incrementally under all alternatives. For the purposes of the EIS analysis, increased density of population and jobs is anticipated to increase the potential demand for police services. However, many factors can influence crime rates. Literature and studies have identified population density and socioeconomic conditions (diminished economic opportunities, concentrations of poverty, high level of transiency, low levels of community participation) as factors as well as prevalent attitudes towards crime and crime reporting.

Property crimes are more prevalent than violent crimes and property crimes such as robbery and motor vehicle theft tend to occur at intersections rather than in whole neighborhoods. Victims of crimes are also more likely to be persons of color and younger; this has been observed in 2021 and 2022 Seattle Crime Reports for shootings.[98]

The estimated number of officers per 1,000 residents is 1.4 in 2022. Given that SPD staffing levels are as low as they have been since 1980 based on data collected by the Washington Association of Sheriffs and Police Chiefs (WASPC), this analysis uses a rate of 1.73~~8~~ officers per 1,000 residents, which is the average rate between 2010 and 2022. See **Exhibit 3.11-39**. Though SPD is able to maintain adequate or near-adequate response times for priority 1 calls given the staffing deficiencies in recent years, an anticipated increase in property crimes (likely to be priority 2, 3, or 4 for SPD dispatch) may continue the upward trend of response times beyond acceptable standards.

Exhibit 3.11-39. Estimate of Officer FTEs per 1000 Residents

Alternative	Area 1	Area 2	Area 3	Area 4*	Area 5	Area 6	Area 7*	Area 8	Total
Current (est.)	219.0	177.7	100.5	143.3	193.1	128.0	6.3	109.3	1,077.0
Alternative 1	266.6	222.3	121.2	212.8	239.2	148.9	13.3	132.3	1,356.6
Alternative 2	283.6	242.6	128.8	212.8	250.5	160.9	14.6	136.7	1,430.5
Alternative 3	280.6	249.7	123.8	212.8	241.1	163.7	13.4	145.4	1,430.5
Alternative 4	279.3	252.8	123.5	212.8	241.3	163.2	13.4	144.1	1,430.5
Alternative 5	295.2	262.1	129.2	212.8	249.7	176.8	19.6	158.9	1,504.3
Preferred	310.0	261.1	132.3	211.1	255.6	173.2	12.0	147.2	1,502.6

Note: The level of service calculation is based on Seattle Police Department's average level of service from 2010-2022 which is 1.73~~8~~ officers per 1,000 residents. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
*Area 7 is predominantly industrial and will be regardless of alternative growth strategy.
Source: Washington Association of Sheriffs and Police Chiefs, 2023; BERK, 2024~~3~~.

[98] Centers for Disease Control and Prevention (CDC), 2020; Pew Research Center, 2020; Seattle Police Department, 2023; US Department of Justice, FBI, 2011; Weisburd, 2015.

Based on population and housing growth alone Alternative 1 would have the least demand and Alternative 5 and the Preferred Alternative the most demand for police staffing. Most demand would occur in areas with the greatest planned growth in Areas 1 and 2. Area 4 Downtown may need alternative ratios with a focus on office employment as well as residential uses. Area 7 may also need other personnel depending on needs with industrially focused land use.

Fire/Emergency Medical Services

Growth in worker and residential populations in the study area is expected to lead to an increased number of calls for aid, basic and advanced life support, and other emergency services. Growth is expected to occur incrementally under all alternatives, as individual development projects are constructed. The Seattle Fire Department would attempt to maintain response times consistent with or better than current performance levels as the population grows. These performance level benefits and reduced overall response times have a strong correlation with staffing at stations and apparatus availability (Haskell, McAuslan, 2023). Over time, additional staffing and equipment within each analysis area would be required in order to maintain or improve performance levels.

Station 31 is the first of many stations that will be needed to meet the demand of its station area. This station is currently under construction and will eventually have increased unit and staff capacity. As mentioned earlier under **Fire/Emergency Medical Services** in **Section 3.11.1**, the City also anticipates it will need to replace Station 3 and the Fire Marshal office, acquire, or develop a new facility for SFD Headquarters, replace or expand the commissary and fire garage, develop a fire station in South Lake Union, and develop a freshwater marine fire suppression facility (City of Seattle 2020).

Based on growth projections of housing units, conversations with SFD staff on current deficits, and the minimum number of apparatuses to maintain a service level close to the current ratios of fire units to housing units, the resulting fire units needed are presented, and rounded to the higher whole number in **Exhibit 3.11-40**.

Exhibit 3.11-40. Apparatus Need by Alternative and Area

Alt	Units	Current Housing Unit per Fire Units	Housing Unit per Fire Unit with Growth Alternative (current app. Inventory)	Area: Fire Units Needed Based on Study Area Growth Estimates and Existing Deficiencies ~~(Rounded)~~*								Total New Additional Fire Units (Estimate ~~Rounded~~)	Projected Housing Units per Fire Unit if Adopted
				1	2	3	4*	5	6	7*	8		
1	Engine	12,231	14,731	1	1	1	1	1	0	0	1	6~~7~~	12,405~~087~~
	Ladder	32,616	39,283	0	0	1	0	0	0	1	1	3	31,426
	Medic	43,488	52,377	0	0	1	1	0	1	0	0	3	39,283
	Aid	55,913	67,342	1	0	1	0	1	1	0	1	4	42,854
	Other	19,570	23,570	1	1	0	0	0	1	1	0	4	19,641
2	Engine	12,231	15,356	1	1	1	1	1	1	1	1	8	12,285
	Ladder	32,616	40,950	0	0	1	0	0	0	1	1	3	32,760
	Medic	43,488	54,599	0	0	1	1	0	1	0	0	3	40,950
	Aid	55,913	70,199	1	1	0	0	1	1	0	1	5	40,950
	Other	19,570	24,570	1	1	0	0	0	1	1	0	4	20,475
3	Engine	12,231	15,356	1	1	1	1	1	1	1	1	8	12,285
	Ladder	32,616	40,950	0	0	1	0	0	0	1	1	3	32,760
	Medic	43,488	54,599	0	0	1	1	0	1	0	0	3	40,950
	Aid	55,913	70,199	1	1	0	1	0	1	0	1	5	40,950
	Other	19,570	24,570	1	1	0	0	0	1	1	0	4	20,475
4	Engine	12,231	15,356	1	1	1	1	1	1	1	1	8	12,285
	Ladder	32,616	40,950	0	0	1	0	0	0	1	1	3	32,760
	Medic	43,488	54,599	0	0	1	1	0	1	0	0	3	40,950
	Aid	55,913	70,199	1	1	0	1	0	1	0	1	5	40,950
	Other	19,570	24,570	1	1	0	0	0	1	1	0	4	20,475
5	Engine	12,231	15,981	2	1	1	1	1	1	1	1	9	12,473
	Ladder	32,616	42,616	0	0	1	0	1	0	1	1	4	31,962
	Medic	43,488	56,822	1	0	1	1	0	1	0	0	4	39,338
	Aid	55,913	73,056	1	1	1	0	1	1	0	1	6	39,338
	Other	19,570	25,570	1	1	0	0	0	1	1	0	4	21,308
PA	Engine	12,231	15,981	2	1	1	1	1	1	1	1	9	12,473
	Ladder	32,616	42,616	0	0	1	0	1	0	1	1	2	36,528
	Medic	43,488	56,822	1	0	1	1	0	1	0	0	3	42,616
	Aid	55,913	73,056	1	1	1	0	1	1	0	1	6	39,338
	Other	19,570	25,570	1	1	0	0	0	1	1	0	4	21,308

Fire unit increase based on LOS Calculation	Fire unit recommendations have been lowered slightly from LOS calculation to reflect needs based on minimum service provision rather than calculated current service provision	Fire unit recommendations have been raised slightly from LOS calculation to reflect needs based on minimum service provision rather than calculated current service provision

*Area~~s~~ 4 recommendations are based on current LOS deficit. Area~~and~~ 7 ~~will~~ only partially use~~s~~ housing data to support additional fire unit recommendations as the current ratio is based on very few housing units and maintaining the current ratio is far beyond LOS standards~~due to employment characteristics~~.
Note: Color coding and key added since Draft EIS for additional clarification on fire unit recommendation rationale. The Preferred Alternative was added to this exhibit since the Draft EIS—minor edits to Alternatives 1–5 aside from the color coding are shown in tracks.
Sources: Seattle Fire Department Annual Report, 2022; BERK, 2024~~3~~.

Additional units would need to be added to meet the current levels of service average dwelling units served by each number of apparatus and type of apparatus. However, based on Seattle Fire Department's Live dispatch dashboard as well as the SFD 2022 annual report, citywide unit additions should reflect aid unit prioritization over other fire units. Across all alternatives, each subarea or battalion should have at least a single aid unit stationed at a centrally located station to limit fire unit dispatches on aid calls.

Secondarily, the recommendations for Area 4 are consistent across all alternatives and reflect the growing need for an additional unit to fill the gap in service in the South Lake Union neighborhood. Overall, these recommendations are based on current service standards which can be greatly improved per **Exhibit 3.11-40**~~Exhibit 3.11-41~~.

Alternative 5 and the Preferred Alternative having the highest growth has the greatest need for apparatus. More apparatus under any of the alternatives may require additional personnel and expanded stations. Any potential future fire facility, staffing, or equipment needs will be included as part of the City's annual Budget and Capital Improvement Program process.

Building Heights and Density

Existing ladder trucks at fire stations citywide are equipped to provide services to buildings of the heights proposed under all alternatives.

Additionally, new buildings of three or more units would be required to meet the Seattle Fire Code which requires sprinklers throughout. No impacts to fire services are anticipated due to increases in building height or density.

Hazardous Materials

Industrial uses often include hazardous materials or have the potential to produce hazardous waste. Hazardous materials are defined by the City of Seattle as "those that pose an unreasonable risk to the health and safety of operating or emergency personnel, the public, and the environment if not properly controlled during handling, storage, manufacture, processing, packaging, use, disposal, or transportation" (City of Seattle 2018).

Additional industrial development under all of the alternatives could increase the amount or prevalence of hazardous materials in the study area. All new development would be required to meet the Seattle Fire Code which includes provisions for hazardous materials. Development proposals would be reviewed by the Seattle Department of Construction & Inspections as well as the SFD. Additional federal and state regulations also apply to development that includes hazardous materials or wastes—for example, WSDOT regulates off-site transportation of hazardous materials, and the Washington State Department of Ecology requires additional permits and inspections for such facilities as underground storage tanks (Seattle Industrial and Maritime Strategy EIS, 2022).

Construction

The Seattle Fire Department makes service calls related to inspection of construction projects and calls to respond to construction-related accidents. As such, increased construction activities associated with potential development under all alternatives could result in an increase in demand for fire services. Existing Fire Department staffing and equipment are anticipated to be sufficient to handle the increased services needed for construction activities.

Transportation Network and Traffic Volumes

Use of the public right of ways is critical to SFD meeting their response goals as the Department is dependent upon the capability of the city's street network to handle traffic flows. Traffic volumes are anticipated to increase under all of the alternatives and no specific transportation projects or changes to emergency access routes are proposed under any of the alternatives, but changes to the street network over time has the potential to impact the mobility of fire response vehicles.

Any street improvements must be consistent with the Seattle Fire Code Section 503 and Appendix D, which address fire apparatus access roads. Additionally, SFD reviews proposed street improvements on a project-by-project basis to identify potential negative impacts on response times. It is anticipated that these mitigation measures would adequately address the potential impacts of future changes to the transportation network under any of the alternatives.

Outreach & Additional Programming

Seattle Fire Department's education programs and fire prevention services utilize education and code enforcement as tools to lower demand on SFD firefighting and EMT resources. Fire prevention services include the Fire Investigation Unit, community risk reduction program, building/construction inspections and permitting, mobile inspections and pre-planning for fire response, plan preview, special hazards, special events and temporary assembly support, and suppression systems testing. These prevention strategies and programs help to reduce the overall demand for SFD services and can help reduce response time and potential negative outcomes from emergencies.

SFD also provides a number of outreach programs, which are necessary to reduce fire risk and increase public awareness on fire safety. These programs restarted in 2022 after a multi-year hiatus caused by the COVID-19 Pandemic. These events can give communities and individuals the tools they need to reduce fire risk and produce better outcomes in the event of emergencies.

Additional information on both fire prevention and outreach events are detailed in both the SFD 2022 Annual Report and **Equity & Climate Vulnerability Considerations** section below.

Parks

Demand & Level of Service

The ~~current~~ former 2017 parks level of service is 8.0 acres per 1,000 population (from Seattle 2035 and 2017 Parks and Open Space Plan). However, the city ~~is considering options for updating~~ updated the level of service as part of an update to the Parks and Open Space Plan in 2024. The 2024 Parks and Open Space Plan's adopted level of service aims to provide parks and park facilities within a 10-minute walk of all residents. As of 2023, approximately 95% of the City's population are within a 10-minute walk of a park or park facility. Within designated regional and urban centers, the City aims to provide parks and park facilities within a 5-minute walk of residents.~~The goal of updating the level of services is to make it more consist with the City's goals and approach to acquisition.~~

~~Additional park acres would be needed under each alternative if the City maintains its 8.0 acres per 1,000 population level of service. Currently, Seattle Parks and Recreation manages 6,478 acres of parks in 2024; see **Exhibit 3.11-25**. The acreage needed would range from 1,312 to 1,968 acres between Alternative 1 and Alternative 5, with Alternatives 2 through 4 requiring an additional 1,640 acres.~~ The alternatives would add more growth including within a 10-minute walk to the parks, and increase demand and use of current parkland. Alternative 1 would have the lowest additional demand with 80,000 more dwelling units and Alternative 5 and the Preferred Alternative the greater demand at 120,000 new housing units. Within each analysis area, the ~~acres~~ population demand ~~required are~~would be highest under the Preferred Alternative (areas 1, 3, 5) or Alternative 5 (areas 2, 6, 7, and 8). ~~except that~~In Area 4, Downtown would have ~~the same~~similar growth and ~~acres needed~~park demand under ~~all~~ studied alternatives, with a slightly lower population under the Preferred Alternative. Under each alternative, expected population growth is lowest in Area 7 due to the focus on employment (except in South Park). ~~See **Exhibit 3.11-41**.~~

~~**Exhibit 3.11-41. Additional Acreage Needed to Meet Parks LOS by Alternative**~~

~~Alternative~~	~~Total Net Acreage Needed~~
~~**Alternative 1**~~	~~1,312~~
~~**Alternative 2**~~	~~1,640~~
~~**Alternative 3**~~	~~1,640~~
~~**Alternative 4**~~	~~1,640~~
~~**Alternative 5**~~	~~1,968~~

~~Notes: Converts housing units to population using a persons per household of 2.05 consistent with regional housing target efforts. The 8 acres per 1,000 population is applied to net population growth.~~
~~Source: BERK, 2023.~~

The City currently has 6,478 acres of parkland. The city contains 53,651 acres and existing open space equates to approximately 12% of the city. If the city obtained the average amount of the alternatives this would raise the total open space to approximately 15% of the city. If no new

acres are added to the City's inventory, the ~~LOS~~ rate of acres per 1,000 would drop as shown in **Exhibit 3.11-41**. ~~Under this scenario, the City could acquire new park land to meet the LOS or change the LOS itself.~~ The City will address park needs within a 10-minute walk of parks.

Exhibit 3.11-41. Acres per 1,000 Population if Park Inventory Does Not Increase

	Actual 2022	Actual 2023	POS 2035	Alt. 1 2044	Alt. 2-4 2044	Alt. 5 2044	Preferred 2044
Population	762,500	779,200	802,358	966,358	862,500	1,007,358	1,007,358
Rate: Acres per 1,000 population	8.50*	8.31	8.07	6.70	6.43	6.18	6.18

Note: Adds potential population of 2.05 persons per household within new housing units to an estimated 2024 base population of 802,358 accounting for housing under construction or permitted. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
*The acres of parks increased between 2017 and 2024 from 6,414 to 6,478. The 2024 estimate is used in this table.
Sources: OFM, 2022; Seattle Parks and Recreation, 2017; BERK, 2024.

Shorelines Public Access

Greater population growth across the city could increase demand for shoreline public access. The alternatives would range in demand from the least under Alternative 1 to the most under Alternative 5 or the Preferred Alternative. Shoreline Master Program requirements for shoreline public access for non-residential development could result in more public access as development occurs in shoreline jurisdiction.

130th/145th Station Area

All alternatives would result in an increased demand for parkland in the city, with most demand under Alternative 5 and the least demand under Alternative 1 and the Preferred Alternative in the 130th Street Station Area. In the 145th Street Area, demand for parkland would be slightly higher under Alternative 2 and Alternative 5 than the No Action Alternative (with demand highest under Alternative 2). See **Exhibit 3.11-42** for a comparison using the 2017 acre metric. The additional population in Alternatives 2 and 5 would create a greater demand within 10 minutes of existing parkland compared to Alternative 1 and the Preferred Alternative.

Exhibit 3.11-42. Growth by Area and Alternative Demand for Park Acres: Station Area

	130th Street Population: Net	130th Street Park Demand (Acres)	145th Street Population: Net	145th Street Park Demand (Acres)
Alternative 1	399	3	1,324	11
Alternative 2	2,151	17	2,376	19
Alternative 5	3,371	27	2,171	17
Preferred	3,245	26	1,317	11

Note: Alternatives 1, 2, and 5 assume a potential population of 2.05 persons per household consistent with regional housing target efforts. The Preferred Alternative uses updated and more detailed information to calculate population growth. Existing population by center is based on OFM's 2023 SAEP April 1 census block estimate of

total population within the revised center boundaries of the Preferred Alternative. Future 2044 population by center was calculated using OFM's 2023 housing unit estimate, additional housing unit permits issued between April 1, 2023 and June 1, 2024 (since the 2023 OFM estimate), a citywide household occupancy rate of 93%, estimated existing people per household by center (per OFM's 2023 household and population estimates), and housing unit growth targets. The Preferred Alternative assumes a potential population of 2.29 persons per household in the 130th Street Urban Center and 2.02 persons per household in the 145th Neighborhood Center. The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1, 2, or 5.
Sources: Seattle Parks and Recreation, 2017; City of Seattle, 2022 and 2024; BERK, 2024~~3~~.

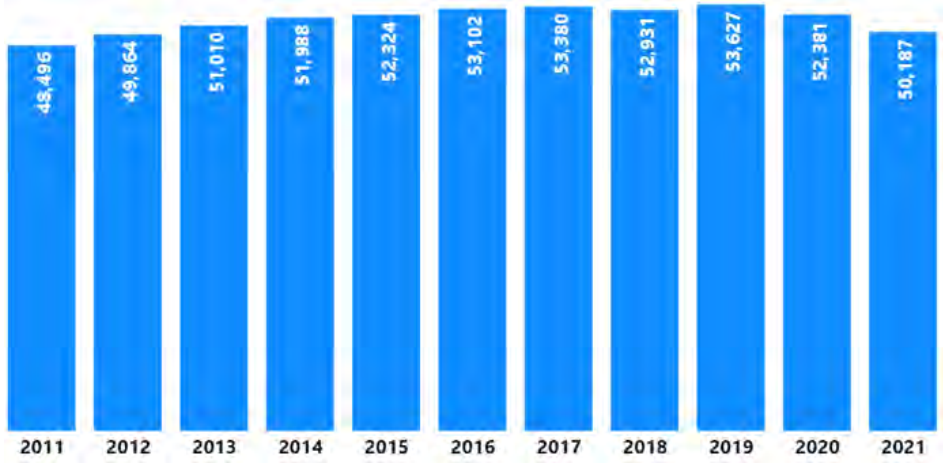
Schools

School enrollment is affected by a variety of factors including demographic trends, economic conditions, private school enrollment, and characteristics of housing stock such as size and cost.

Existing Trends

There are currently 50,056 students enrolled in Seattle Public Schools. This number represents about 80% of children enrolled in K-12 education. Over the last 10 years, enrollment in Seattle Public Schools increased from 49,900 students in 2012 to 53,600 students in 2019 and then decreased to ~~*~~50,056 students by 2022. This change occurred during a period that Seattle added around 75,000 housing units. See **Exhibit 3.11-43**.

Exhibit 3.11-43. Seattle Public School Enrollment 2012-2022



Source: SPS, 2023.

Estimates at Current Student Ratio

It is not possible to develop an accurate twenty-year projection of school needs given the wide variety of factors that influence these numbers and the recent fluctuations in public school enrollment. As a high-end estimate of potential impacts, it may be helpful to estimate the number of new classrooms that would be needed if recent trends change and the percentage of the total population enrolled in Seattle Public Schools holds steady over the next twenty years. Based on current student enrollment and city population, about 6.56% of the total population are K-12 students in the Seattle Public School District. See **Exhibit 3.11-44**.

Exhibit 3.11-44. Students as Percentage of Total Population

	Number
Seattle School District Population (OFM 2022)	763,302
Enrollment Seattle School District OSPI 2022-2023	50,056
Students as a Percentage of Total Population	6.56%

Source: OSPI Student Information, 2023; OFM, 2022; BERK, 2023.

Applying this rate to expected population growth shows a range of 10,912-16,368 students generated by each alternative, the least under Alterative 1 and the most under Alternative 5 or the Preferred Alternative. See **Exhibit 3.11-45**. Depending on the grade level and pace of housing and population growth, new classrooms or schools could be needed over time to accommodate growth. The total number of students is divided by 25 students per elementary school classroom to translate this number into potential elementary school classrooms—between 436 and 655 classrooms. This additional enrollment could be accommodated through a combination of accommodating students at schools that are currently under capacity, adding classrooms at existing school sites, and, potentially, adding new schools.

Exhibit 3.11-45. Housing, Population, and Potential Public School Students Assuming Current Student Percentage

Alternative	Net Change in Housing	Net Change in Population	Student Generation	Equivalent Elementary Classrooms
Alternative 1	80,000	164,000	10,755~~10,912~~	430~~436~~
Alternative 2	100,000	205,000	13,444~~13,640~~	538~~546~~
Alternative 3	100,000	205,000	13,444~~13,640~~	538~~546~~
Alternative 4	100,000	205,000	13,444~~13,640~~	538~~546~~
Alternative 5	120,000	246,000	16,132~~16,368~~	645~~655~~
Preferred	120,000	246,000	16,132	645

Note: Converts housing units to population using a persons per household of 2.05 consistent with regional housing target efforts~~Applies 2.05 per household, 2017-2021 ACS~~; assumes 25 students per classroom. The Preferred Alternative was added to this exhibit since the Draft EIS—edits to Alternatives 1–5 are shown in tracks.
Source: City of Seattle, 2024~~3~~; SPS, 2021; SPS 2023; BERK, 2024~~3~~.

Under this calculation, most population growth, and therefore students, would be added in areas 1 and 2 for all of the alternatives (see **Exhibit 3.11-46**). Student growth in Area 4 would be the same across all Draft EIS alternatives 1 to 5 and would likely go to schools in areas 3 and 5 as there are no schools located in Downtown. Preferred Alternative students in Area 4 are slightly lower. Areas 6, 7, and 8 would have the second highest share of population and students in all the Draft EIS action alternatives. Preferred Alternative students in Areas 6-8 are slightly lower. In total the Preferred Alternative students are the same as Alternative 5.

Exhibit 3.11-46. Share of Students by Area: North, Central, and West/South Seattle Assuming Current Student Percentage

Alternative	Areas 1-2	Students (Net)	Area 4	Students (Net)	Areas 3 & 5	Students (Net)	Areas 6-8	Students (Net)	Total Students (Net)
Alternative 1	33%	3,569 ~~3,621~~	24%	2,610 ~~2,648~~	24%	2,591 ~~2,629~~	18%	1,985 ~~2,015~~	10,755~~10,912~~
Alternative 2	37%	4,925 ~~4,997~~	19%	2,610 ~~2,648~~	24%	3,280 ~~3,328~~	20%	2,629 ~~2,667~~	13,444~~13,640~~
Alternative 3	38%	5,078 ~~5,152~~	19%	2,610 ~~2,648~~	20%	2,752 ~~2,793~~	22%	3,003 ~~3,047~~	13,444~~13,640~~
Alternative 4	38%	5,141 ~~5,216~~	19%	2,610 ~~2,648~~	20%	2,749 ~~2,789~~	22%	2,944 ~~2,987~~	13,444~~13,640~~
Alternative 5	38%	6,057 ~~6,146~~	16%	2,610 ~~2,648~~	20%	3,262 ~~3,310~~	26%	4,203 ~~4,264~~	16,132~~16,368~~
Preferred Alternative	41%	6,612	16%	2,571	22%	3,578	21%	3,371	16,132

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—edits to Alternatives 1–5 are shown in tracks.
Source: BERK, 2024~~3~~.

Within the analysis areas, most growth would be directed to centers and villages under all alternatives and schools in those areas would be most affected. However, in Alternatives 2 through 5, more areas currently designated urban neighborhood and proposed as urban neighborhood would see growth, which may be focused around neighborhood centers, corridors, or elsewhere distributed through distributed growth of missing middle housing types.

Overall Impact

While K-12 public school enrollment has declined over the last 5 years, and is projected to continue declining through 2033, future population growth through 2044 has the potential to increase student enrollment in various areas throughout the city. Seattle Public Schools monitors changes in enrollment to track expected future needs and would adjust their enrollment projections accordingly for future planning cycle. SPS would respond to the exceedance of capacity as it has done in the past by adjusting school boundaries and/or geographic zones, adding or removing portables, adding/renovating buildings, reopening closed buildings or schools, and/or pursuing future capital programs.

130th/145th Station Areas

Under multiple alternatives, two station areas at 130th and 145th Street would be rezoned and allow greater density. There would be an increase in housing and population with most under Alternative 5 and least under Alternative 1. This increase could lead to an increase in the student population as well. Depending on alternative, the number of students could be greatest in 130th Street Station (Alternative 5) or at 145th Street (Alternative 2). See **Exhibit 3.11-47**.

Exhibit 3.11-47. Share of Students by Station Area Assuming Current Student Percentage

Alternative	130th Street Housing Units (Net)	Population (Net)	Students (Net)	145th Street Housing Units (Net)	Population (Net)	Students (Net)	Total Students 130th-14t5th
Alternative 1	194	399	27	646	1,324	87	113
Alternative 2	1,049	2,151	143	1,159	2,376	156	297
Alternative 5	1,644	3,371	224	1,059	2,171	142	363
Preferred	1,500	3,245	213	652	1,317	86	299

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Source: BERK, 2024~~3~~.

Solid Waste

Growth in residential, commercial, and self-haul solid waste is expected to increase under all alternatives. For the purposes of the EIS analysis, increased density of population and jobs is anticipated to increase demand linearly. Estimates for this EIS are based on average annual tons of waste produced by sector and solid waste stream from 2020-2020. From 2000 to 2020 recycling and composting rates have increased per capita in Seattle while overall residential waste decreased every year from 2000-2019 with a slight increase in 2020 due to the COVID-19 Pandemic.

Exhibit 3.11-48 shows the most recent per capita waste generation from 2020 extracted from the 2022 Solid Waste Plan Update. Based on population, jobs, and housing growth alone Alternative 1 would have the least waste generation and Alternative 5 and the Preferred Alternative the most. Most demand would occur in areas with the greatest planned residential growth such as Areas 1 and 2 while Area 4 would see an increase in both commercial and residential solid waste. Other areas and alternatives will also see growth in solid waste service demand proportionate to growth planned.

Exhibit 3.11-48. 2020 Waste Generation Rates/Capita/Year based on 2020 Rates

	Commercial	Single-Family Residential	Multi-Family Residential	Self-Haul
Recycling + Compost	61.6%	71.2%	36.6%	11%
	1.93 lbs./employee/day (estimated)	1.62 lbs./resident/day (estimated)	0.83 lbs./resident/day (estimated)	0.19 lbs./resident/day (estimated)
Garbage	38.4%	28.8%	63.4%	89%
	1.21 lbs./employee/day (estimated)	0.65 lbs./resident/day (estimated)	1.44 lbs./resident/day (estimated)	1.54 lbs./resident/day (estimated)
Total Waste Generation Rate per capita	3.14 lbs./employee*/day (estimated)	2.27 lbs./resident/day (estimated)	2.27 lbs./resident/day (estimated)	1.73 lbs./resident/day (estimated)
Total Waste Generation in 2020	572,072,000 lbs.	464,076,000 lbs.	167,402,000 lbs.	219,688,000 lbs.

* "Employees" in this dataset refers to positions covered by the Washington Unemployment Insurance Act. The Act exempts self-employed, proprietors, and corporate officers, military personnel, and railroad workers, so those categories are not included in the dataset. Covered Employment accounts for approximately 85% to 90% of all employment.
Source: Seattle 2022 Solid Waste Plan Update (Ch. 3), 2022; BERK, 2023.

Exhibit 3.11-49 and **Exhibit 3.11-50** offer estimates of each solid waste stream by customer types for alternatives based on job growth estimates and housing units. The number of people per household is variable but is estimated at 2.05 people per household for these calculations. All alternatives estimate 158,000 additional jobs in Seattle between 2024 and 2044.

Exhibit 3.11-49. Estimated Tons of Solid Waste (Garbage, Recycling, Compost) Generated by Alternative—Residential

Scenario	Resident estimates	Tons of Waste Per year estimate	Tons of Diversion at goal rate: 70%
Current: 2020	762,148	315,739	221,017
Alternative 1	966,358	400,338	282,336
Alternative 2	1,007,358	417,323	292,126
Alternative 3	1,007,358	417,323	292,126
Alternative 4	1,007,358	417,323	292,126
Alternative 5	1,048,358	434,308	304,015
Preferred	1,048,358	434,308	304,015

Note: The Preferred Alternative was added to this exhibit since the Draft EIS—no edits were made to Alternatives 1–5.
Sources: SPU, 2020 Annual Waste Prevention & Recycling Report; BERK, 2024~~3~~.

Exhibit 3.11-50. Estimated Tons of Waste Generated for Commercial Customers

Year	Employee Estimates	Tons per year based on 2020 per employee estimate	Diversion at current recycling rate: 61.6%	Diversion at goal recycling rate: 70%
2020 (per 2020 employee estimate)	499,146 employees	286,036 tons	176,198.2 tons	200,225.2 tons
2044 estimates, all alternatives	746,447 employees	427,751 tons	263,494.9 tons	299,426 tons

Sources: SPU, 2020 Annual Waste Prevention & Recycling Report; BERK, 2023.

To meet the additional need for solid waste services, contracts with waste haulers are renegotiated every 10 years. Fees charged to residential and commercial customers from Seattle Public Utilities and from waste haulers directly support the necessary capital investments needed to ensure minimum levels of service.

Equity & Climate Vulnerability Considerations

Police

SPD has developed Micro Community Policing Plans (MCPP) to address the individual needs of each community. Based on the City's equity opportunity areas evaluation and engagement with the community in each area, these plans could be updated.

Police access to parts of the city could be affected by extreme precipitation, flooding, sea level rise, and landslides. Response times may be affected by climate-exacerbated natural hazards such as flooding. As police officers often work outdoors, officers may be affected by extreme heat. These considerations are expected to be similar across alternatives; alternatives with greater growth may require greater police services and may mean additional personnel and facilities that need to be adapted for climate resilience.

Fire/Emergency Medical Services

SFD leverages staff, facilities, and training resources to better address inequitable distributions of fire risk in homes, inequitable health outcomes, and the increased risk of wildfire smoke in our region.

While the Seattle Fire Department is the main firefighting entity within Seattle, most of its work is rooted in health services and fire prevention. To reduce fires in homes SFD works with communities throughout Seattle to distribute fire prevention flyers that have been translated in the top seven spoken languages in Seattle to ensure compliance with fire safety standards regardless of language.

Fire prevention outreach also helps alleviate racial and social inequities. There is a correlation between age of housing units and high prevalence of disadvantages related to Race and Socio-economic status. Data gathered via Seattle's Market Rate Housing Needs and Supply Analysis (2021) as well as the Seattle Racial and Social Equity Index (2018) indicate that housing structures in the Southwest, Southeast, and East Central regions of the city are more likely to be older and to potentially benefit from fire prevention outreach. These areas are also more disadvantaged than elsewhere in the city per the Racial and Social Equity Index. Targeting fire prevention outreach in these areas is vital to alleviating fire safety inequity.

Aside from outreach and prevention, SFD also performs fire inspections on existing homes as well as required inspections on new development. Each growth alternative will result in an increase in the number of multi-family units and may require additional staff to adequately provide fire prevention services to the growing population. Alternative 5 and the Preferred Alternative would have more demand than Alternatives 2-4 and Alternative 1. See **Exhibit 3.11-40**.

Aid and medical response are also duties of SFD. Negative health outcomes as a result of certain environmental and climatic conditions are inequitably distributed in historically disadvantaged communities such as poor air quality or wildfire smoke leading to respiratory and cardiovascular diseases. Poor air quality may result in more serious chronic medical conditions that require emergency medical transport more often as well as Basic or Advanced life support for acute medical emergencies. Air quality hazards are exacerbated by climate change, vehicular traffic, and the increased wildfire smoke risk facing Washington State in recent years (Seattle & King County Public Health 2021). The potential for each alternative to locate growth near sources of pollution like major highways is addressed in **Section 3.2 Air Quality & GHG Emissions**.

Parks

Alternatives & Parks in Highest Equity Priority Areas

Parks are important for community health and well-being and a key amenity in growth areas. The City developed an overlay of public space priority areas considering race and social equity, density and growth, and health outcomes in **Exhibit 3.11-51**. Areas of centers/ urban centers are considered a priority for 5-minute walks to parks and areas outside of centers/ urban centers are considered a priority for 10-minute walk to parks.

Since the 2020 evaluation of "Outside Citywide" the City has updated its Racial and Social Equity Index in with ACS 5-Year data 2017-2021; see **Chapter 1**. Areas of the highest priority for plans/programs/investments based on Race and Social Equity are generally in the south end of the City including Delridge (Area 6), South Park (Area 7), and Southeast Seattle (Area 8), as well as locations generally north of NE 85th Street along NE 145th Street/SR 523 (Area 1) and along Lake City Way/SR 522 (Area 2), and central areas like Pioneer Square, International District, and Central District (Areas 4 and 5). The University District has a high share of students who likely have lower incomes. Area 3 does not have highest or second highest equity priority areas.

Urban centers considered to be park priority investment areas in **Exhibit 3.11-51** are not necessarily considered highest equity priority considering the Racial and Social Equity Index alone, including Ballard, West Seattle Junction, and Morgan Junction.

Exhibit 3.11-51. Racial and Social Equity Index: Highest Equity Priority

Analysis Area	General Areas of Concern	Areas Subject to Urban Centers Walkability Policy in POS Plan
1	Bitter Lake, N 105th Street	Bitter Lake
2	Northgate, and Lake City Way University District	Lake City, Northgate U District
3	None	None
4	Downtown, Pioneer Square, and International District	Downtown
5	Yesler Terrace and Atlantic neighborhoods	First Hill/Capitol Hill 23rd & Union Jackson
6	High Point, South Delridge, Roxhill, Highland Park	Westwood-Highland Park
7	Greater Duwamish and South Park	South Park

Source: BERK, 2023.

Alternative 5 and the Preferred Alternative have ~~has~~ the most growth of the studied alternatives and generally would distribute the most growth and demand for parks under all areas except Area 4 Downtown where proposed growth is consistent across all alternatives and Area 5

(Central/East) where Alternative 2 has the most growth proposed. Where growth is focused, there could be more investment in parkland to serve the growth including in Race and Social Equity priority areas, particularly if the City requires provision of open space or contribution to city parks by new development. However, if growth outpaces investment in parks, there could be a degradation of acres per capita and greater demand on existing facilities.

Parks & Heat Islands

The areas considered to have greater heat islands due to impervious areas and less tree canopies are shown on **Exhibit 3.11-52**. Particularly warm areas morning and evening include Downtown, Greater Duwamish MIC, and Southeast Seattle, portions of which are considered to be Highest Equity Priority in part. Adding parkland and improving tree canopy in parkland and other public property like rights of way could also improve climate resilience and community health.

Exhibit 3.11-52. Heat Islands in Seattle



Notes: The morning index illustrates areas with the most concreate and building mass such as downtown Seattle are warm and likely retaining heat and emitting the previous day's heat through the nighttime. The afternoon map shows cooler temperatures; mid-day shadowing from buildings could cool temperatures in downtown. The evening temperatures are relatively high again with greater areas of concrete retaining heat into the evening.
Source: CAPA/NIHHIS. 2022. "Heat Watch Seattle & King County." OSF. August 2. osf.io/mz79p.

Schools

Seattle's Racial and Social Equity Index identifies Highest or Second Highest Equity Priority Areas around Rainier Valley, Beacon Hill, Delridge, High Point, Downtown, Central Area, University District, Greenwood, Bitter Lake/Haller Lake, and Lake City. More of the priority areas are in study areas 6, 7, and 8 in the southern portion of the city.

The City's responsibility in planning for schools is to coordinate with the School District in planning for growth and modernization. The City is also responsible for implementing zoning and development standards regulating new development on school property. The City also plays a role in ensuring access to schools with safe travel routes. Equitable access improvements would help all local students in priority areas for race and social equity. The latest 2021-2025 action plan includes priorities for communities of color, low-income communities, immigrant, and refugee communities, those with disabilities, homeless, LGBTQ communities, and girls.

Solid Waste

Seattle Public Utilities' Solid Waste Division has staff and contractors that are at high risk for the negative impacts of extreme weather events. Many of these workers are subject to extreme heat and extreme precipitation events that are made more severe and common by climate change. These hazards are mitigated through contracts with waste hauling entities to ensure the health and safety of staff that are at risk.

SPU has also joined with Seattle City Light to mitigate cost burden of utility services on low-income households through the Utility Discount Program. This program ensures that cost will not be a barrier for households to receive services provided by Seattle Public Utilities and Seattle City Light. This program's application process, as well as all outreach material created by Seattle Public Utilities, are translated into a number of languages to serve non-English speakers in Seattle and to lower the barrier to these vital public services.

The Clean City Division of SPU also provides necessary debris clearance in the event of climate emergencies and ensure equitable distribution of resources by utilizing Seattle's Racial Equity Toolkit in program planning and implementation. This toolkit and the division ensure that public litter receptacles, litter abatement routes, and encampment solid waste collection (purple bag program) are equitably distributed throughout the city and are not prioritized in highly resourced communities.

Impacts of Alternative 1: No Action

Police

Alternative 1 will concentrate growth on already existing urban centers. These urban centers could see an increase in demand for police services in these higher growth areas. Alternative 1

represents the lowest increase in demand for Seattle Police Department services but still a slight increase in number of officers.

Fire/Emergency Medical Services

Alternative 1 will concentrate growth on already existing urban centers in Downtown, University District, and Northgate areas and urban centers throughout the city. Current demand for additional aid units in urban centers will increase incrementally and will likely require additional unit to make up apparatus and staff deficits in Area 4. Concentrated growth in Area 4 with multifamily dwellings and less growth in areas will not increase the risk of fire but may increase the number of false alarms that still require dispatch by SFD. Current inspections staff should be adequate in meeting the construction inspections demand.

Parks

Alternative 1 studies the lowest overall growth of the Draft and Final EIS alternatives and would thus result in the lowest amount of required new park acres. The No Action Alternative emphasizes growth in Downtown with the greatest demand for parkland there, followed by areas 1, 5, and 2. The least amount of growth would be in areas 6, 7, and 8 in southwest and southeast Seattle.

Schools

Alternative 1 has the lowest growth overall citywide and the lowest student generation. Most growth would be located in areas 1 and 2 and in the north portion of the city. Most schools have capacity for more students but if the net growth is on top of existing students more school capacity could be needed.

Solid Waste

Alternative 1 will concentrate growth in urban centers which will increase demand for Recology waste hauling service as they are the main hauler of residential customers in these areas. Of the new housing units estimated, roughly 67,000 are estimated to be multifamily customers and the remaining 13,000 are estimated to be single-family solid waste customers. Because multi-family customers have lower overall recycling rates, in order for the City to reach its 70% recycling goal SPU would need to increase its emphasis on education and outreach.

New infill and other residential development will also require additional waste hauling staff to meet the minimum levels of service of weekly garbage and compost collection and bi-weekly recycling collection for residential customers.

130th/145th Station Area

Police

The net population of the area is anticipated to be over 400 over the 20-year planning period. It is anticipated that growth would lead to incremental demand in Area 2.

Fire/Emergency Medical Services

The impacts of this station are not anticipated to increase with minimal zoning changes. However, this area is currently identified as potentially needing additional units at the Bitter Lake fire station to meet minimum service standards. This likely would not require a new station given that nearly all development is targeted at urban centers and the Northgate station is already well equipped with support units in case of multiple calls to the transit station area.

Parks

There would be relatively low additional demand for parkland in the 130th and 145th Street Station Areas under this scenario.

Schools

Alternative 1 produces a small residential growth number and similarly low number of students. The number of students would be spread to three elementary schools near to the stations and one middle school and one high school. It is unlikely to require changes to local school capacities or attendance boundaries.

Solid Waste

Alternative 1 produces a small residential growth number. The number of dwelling units would change the type of service but would not significantly impact levels of service.

Impacts of Alternative 2: Focused

Police

Alternative 2 would add 100,000 in new housing units and 205,000 in population. The 20,000 dwellings above Alternative 1 would largely be added in neighborhood centers, small mixed use nodes Alternative 2 could require a maximum of 1,430 police officers (FTEs) to meet potential additional demand, and most would serve the added growth in centers and newly designated nodes. Most growth though would be in the northern portion of the city in Areas 1 and 2.

Alternative 2 would add 158,000 employees like all other alternatives, with most in downtown neighborhoods. Unlike Alternative 1 a small share of jobs (~10%) would be located in

neighborhoods to serve the greater residential growth. Thus, a slightly higher potential for calls for service in the neighborhoods beyond centers could occur, such as the neighborhood centers.

Fire/Emergency Medical Services

The addition of neighborhood centers in this alternative creates a higher need for fire units and additional staff in Areas 1 and 2. Based on the assessment, current LOS might be met with an additional station that includes at least one engine and one ladder unit. One of these two stations should also receive either an aid or medic car to provide BLS or ALS.

New growth would be developed in accordance with fire codes. Over the planning period to 2044, structures that are retained would continue to age and SFD fire prevention outreach would continue to be important.

City investments in climate resilience in areas with heat islands (see **Exhibit 3.11-52** in Parks evaluation) could reduce the potential for emergency aid calls during extreme heat. The development added to centers and new neighborhood centers as well as the City's tree canopy goals and strategies on public and private lands could support improved climate resilience. There are added neighborhood centers in Areas 6 and 7; although there are relatively fewer neighborhood centers in Area 8 there are centers where growth could be focused.

See **Section 3.2 Air Quality & GHG Emissions** regarding equity and climate resilience and air quality such as buffers from high-volume roads and filtration of dwellings.

Parks

Growth under Alternative 2 would ~~require 1,664 additional acres of~~create more demand for parks across the city. More growth is planned in areas 1 and 2 and so those analysis areas would create the most demand for parks. Growth under Alternative 2 would also result in more demand for parkland in Area 5 than any of the other alternatives.

Schools

Alternative 2 would place the most growth in areas 1 and 2 like Alternative 1. With a higher level of housing and student growth there would be increases in areas 3 and 5-8 compared to Alternative 1. The same level of growth is planned in Centers and Villages, and more growth would be in neighborhood centers across the city, incrementally affecting nearby schools, and less in lands outside these areas of focus. Existing schools may need added classrooms, schools, or attendance boundary changes depending on the rate of growth.

Solid Waste

Alternative 2 would add an estimated 100,000 new housing units in neighborhood centers, small mixed-use nodes, as well as the Downtown Core. About 90% of these units are estimated to be multifamily solid waste customers while the remaining units would be single family

customers. This alternative would also require an increase in education and outreach. It will increase demand for solid waste haulers and would put additional strain on other solid waste services such as illegal dumping and public place litter and recycling. However, the overall capacity of the solid waste system is anticipated to be adequate.

130th/145th Station Area

Police

Under Alternative 2, population would increase by over 2,100 and nearly double the demand for services in the subarea and contribute to more service needs in Area 2.

Fire/Emergency Medical Services

Fire services at the station area would require either a new station or additional units at Bitter Lake to support higher density housing, which results in additional aid calls as well as one additional firefighting unit as is customary at new stations. SFD has identified this area as a hole in service that falls just outside of the minimum response buffer of two different stations; providing additional units at one or both stations could better equip them to handle increased demand.

Parks

Under Alternative 2, growth would contribute to citywide demand for parks. There could be more residents using existing parks in the study area at nearly twice planned as under Alternative 1, and a greater need to improve existing parks to address the greater demand.

Schools

There would be a greater than doubling of expected students, though relatively low compared to Area 2 and citywide growth. There may need to be capacity changes to one or more existing schools or changes to attendance boundaries.

Solid Waste

Alternative 2 produces a larger number of residential units. The number of dwelling units would change the type of service but would not significantly impact levels of service. Multi-family dwellings require more garbage service relative to recycling and composting when compared to single family dwellings.

Impacts of Alternative 3: Broad

Police

Impacts of Alternative 3 on demand for officers would be similar to Alternative 2 with similar growth numbers and need for officers. Most growth would continue to be in centers, but the 20,000 additional residential dwellings would be distributed in a less dense fashion across the NR designation in middle housing types and calls for service may likewise be more diffuse.

Fire/Emergency Medical Services

This alternative will distribute more households throughout the city and will potentially increase needs in Area 1 and Area 2. However, because Area 1 has the highest number of units of any of the service areas, it would be a better use of resources to support aid units in Area 2, Area 4, and Area 8. Additionally, each area of this alternative aggregates to one additional firefighting specific unit depending on the density of the area. This may result in an additional station in South Lake Union to support an additional engine, or possibly increased usage of existing stations.

Investments in climate resilience to address health/emergency services would be likely focused where growth is concentrated in centers, as well as in rights of way and public and private lands (e.g., green infrastructure, tree canopy).

Parks

Alternative 3 distributes a similar amount of growth as Alternatives 2 and 4 but emphasizes growth in areas 1 and 2. Impacts would be similar to those described under Alternative 2.

Schools

Alternative 3 would place the most growth in areas 1 and 2 like Alternatives 1 and 2 and also place a similar amount of growth in centers and villages as these alternatives. The difference in growth is distributed across urban neighborhood areas in each alternative, and there could be incremental demand increases at all schools. Existing schools may need added classrooms, schools, or attendance boundary changes depending on the rate of growth.

Solid Waste

Impacts of this alternative would be similar to Alternative 2 in terms of amount of housing units estimated. However, the distribution of the units is broader across the city and would impact both solid-waste haulers more equally in terms of demand. The number of single-family customers would increase with the increase in in-fill development, but a large proportion of the growth (~68%) would still be in the number of multifamily customers. Education and outreach demand would increase at a slightly lower level than Alternative 2 but would still be required

to meet diversion targets of 70% in residential solid waste. However, the overall capacity of the solid waste system is anticipated to be adequate.

130th/145th Station Area

Not applicable. Under Alternative 3, the station area plan would not be implemented and citywide place types would apply. See the cumulative evaluation under Alternative 3 in Area 2.

Impacts of Alternative 4: Corridor

Police

Impacts of Alternative 3 on demand for officers would be similar to Alternative 2 with similar growth numbers and need for officers. Most growth would continue to be in centers, but the 20,000 additional residential dwellings would be distributed in a less dense fashion across the NR designation in middle housing types and calls for service may likewise be more diffuse.

Fire/Emergency Medical Services

This alternative will distribute more households throughout the city and will potentially increase needs in Area 1 and Area 2. However, because Area 1 has the highest number of units of any of the service areas, it would be a better use of resources to support aid units in Area 2, Area 4, and Area 8. Additionally, each area of this alternative aggregates to one additional firefighting specific unit depending on the density of the area. This may result in an additional station in South Lake Union to support an additional engine, or possibly increased usage of existing stations.

Investments in climate resilience to address health/emergency services would be likely focused where growth is concentrated in centers, as well as in rights of way and public and private lands (e.g., green infrastructure, tree canopy).

Parks

Alternative 4 distributes a similar amount of growth as Alternatives 2 and 3 but emphasizes growth in areas 2, 6, and 8. Impacts would be similar to those described under Alternative 2 with more parkland needed in areas 2, 6, and 8.

Schools

Alternative 4 would place the most growth in areas 1 and 2 like Alternatives 1, 2, and 3, and also place a similar amount of growth in centers and villages as these alternatives. The difference in growth is distributed along corridors in urban neighborhood areas, and there could be incremental demand increases at serving schools. Given the size of attendance

boundaries, there is likely not much difference in increased demand between Alternatives 3 and 4. Existing schools may need added classrooms, schools, or attendance boundary changes depending on the rate of growth.

Solid Waste

Impacts of this alternative would be similar to Alternative 2 in terms of amount of housing units estimated. However, the distribution of the units is broader across the city and would impact both solid-waste haulers more equally in terms of demand. The number of single-family customers would increase with the increase in in-fill development, but a large proportion of the growth (~68%) would still be in the number of multifamily customers. Education and outreach demand would increase at a slightly lower level than Alternative 2 but would still be required to meet diversion targets of 70% in residential solid waste. However, the overall capacity of the solid waste system is anticipated to be adequate.

130th/145th Station Area

Not applicable. Under Alternative 3, the station area plan would not be implemented and citywide place types would apply. See the cumulative evaluation under Alternative 3 in Area 2.

Impacts of Alternative 5: Combined

Police

Alternative 5 would have the greatest demand for additional police services by adding 40,000 more dwellings than Alternative 1 for total new growth of 120,000 or 246,000 new residents. The Alternative maximizes growth in all centers, nodes, corridors, and NR designations. It could require investment in police stations in all areas.

Fire/ Emergency Medical Services

This alternative presents the greatest number of additional dwelling units as well as the highest potential to overload existing fire stations. Growth is spread throughout the city and is maximized as this alternative more evenly distributes higher density housing and increased targeted growth.

Additional stations could be added to fill the holes in service near Area 1 or 2, I-5 corridor, or North Seattle, as well as in Area 5 near South Lake Union. Additionally extra units may be leveraged in Area 8 to support the larger geographic area whose growth may be achieved through smaller multifamily dwellings that are exempt from certain fire suppression measures.

The potential opportunities for investment in climate resilience particularly addressing extreme heat would be greatest (e.g. green infrastructure, tree canopy, etc.). More buildings could be designated for passive cooling and air filtration.

Parks

Demand for additional parkland would be highest under Alternative 5 with 40,000 more dwellings than Alternative 1 and 20,000 more than Alternatives 2 and 3. Alternative 5 matches or exceeds growth of the other alternatives in each area except in Area 5 where growth is slightly lower than Alternative 2.

Schools

Alternative 5 has the greatest population growth and the greatest demand for schools. All areas of the city would see more growth, though still focused in areas 1 and 2. All place types—centers, corridors, and residential districts would see growth and require increased educational services. More than other studied alternatives, existing schools may need added classrooms, schools, or attendance boundary changes depending on the rate of growth.

Solid Waste

This alternative presents the greatest number of additional dwelling units citywide. Growth is spread throughout the city and is maximized as this alternative more evenly distributes higher density housing and increased targeted growth. There would be additional need for outreach and engagement in multifamily residential developments, additional stress on public place litter and recycling and illegal dumping contractors, as well as increases in the number of routes needed to reach minimum levels of service for residential and commercial customers.

Even under the highest growth, the overall capacity of the solid waste system is anticipated to be adequate provided the solid waste plan is implemented. The plan is anticipated to be updated over time as the city grows over the 20-year period.

130th/145th Station Area

Police

Population would equal over 3,400 and more than double the current population, and lead to the highest level of demand in the station area and contribute to overall demand in Area 2.

Fire/Emergency Medical Services

This alternative presents that largest increase in unit needs for the transit stations areas. If an additional aid unit is provided at each of the nearby stations at Bitter Lake and Lake City, SFD can maintain and even improve the service levels of the station area without being forced to cross Interstate-5 which may present a challenge depending on the time of day.

Parks

Demand in the study area would contribute to the higher citywide demand for parks. Locally, Alternative 5 has the most residential growth in 130th Street Station Area. Growth and demand for parks in the 145th Street Station Area is second highest under Alternative 5. There could be increased usage at local parks and a need to increase capacity.

Schools

Under Alternative 5, impacts to schools immediately in the station areas would be similar to and slightly greater than Alternative 2 with a small difference in expected students.

Solid Waste

Under Alternative 5, impacts to solid waste would be similar to and slightly greater than Alternative 2 with a small increase in the number of dwelling units and waste volume.

Impacts of Preferred Alternative

Note: The impacts analysis for the Preferred Alternative was added since the Draft EIS.

Police

Similar to Alternative 5, the Preferred Alternative would have the greatest demand for additional police services by adding 40,000 more dwellings than Alternative 1 for total new growth of 120,000 or approximately 246,000 new residents. The Alternative maximizes growth in all regional centers, urban centers, neighborhood centers, corridors, and urban neighborhood designations. It could require investment in police stations in all areas. Areas 1 and 2 would have the most residential growth.

Fire/ Emergency Medical Services

This alternative presents the greatest number of additional dwelling units as well as the highest potential to overload existing fire stations. Growth is spread throughout the city with most in Areas 1 and 2.

Additional stations could be added to fill the holes in service near Area 1 or 2, I-5 corridor, or North Seattle, as well as in Area 5 near South Lake Union. Additionally extra units may be leveraged in Area 8 to support the larger geographic area whose growth may be achieved through smaller multifamily dwellings that are exempt from certain fire suppression measures.

The potential opportunities for investment in climate resilience particularly addressing extreme heat would be greatest (e.g. green infrastructure, tree canopy, etc.). More buildings could be designated for passive cooling and air filtration.

Parks

Demand for additional parkland would be like Alternative 5 and would have 40,000 more dwellings than Alternative 1 and 20,000 more than Alternatives 2 and 3. The Preferred Alternative matches or exceeds growth of the other alternatives in each area except in Area 5 where growth is slightly lower than Alternative 2.

Schools

Along with Alternative 5, the Preferred Alternative has the greatest population growth and the greatest demand for schools. All areas of the city would see more growth, though still focused in Areas 1 and 2. All place types—centers, corridors, and residential districts would see growth and require increased educational services. More than Alternatives 1-4, and similar to Alternative 5, existing schools may need added classrooms, schools, or attendance boundary changes depending on the rate of growth.

Solid Waste

This alternative presents the greatest number of additional dwelling units citywide similar to Alternative 5. Growth is spread throughout the city and is maximized as this alternative more evenly distributes higher density housing and increased targeted growth. There would be additional need for outreach and engagement in multifamily residential developments, additional stress on public place litter and recycling and illegal dumping contractors, as well as increases in the number of routes needed to reach minimum levels of service for residential and commercial customers.

Even under the highest growth, the overall capacity of the solid waste system is anticipated to be adequate provided the solid waste plan is implemented. The plan is anticipated to be updated over time as the city grows over the 20-year period.

130th/145th Station Area

Police

Population growth in the 130th Street Station Area would equal about 3,245, which would about double the current population. This would lead to the second highest level of demand in the station area and contribute to overall demand in Area 2.

Fire/Emergency Medical Services

This alternative presents that largest increase in unit needs for the transit stations areas. If an additional aid unit is provided at each of the nearby stations at Bitter Lake and Lake City, SFD can maintain and even improve the service levels of the station area without being forced to cross Interstate-5, which may present a challenge depending on the time of day.

Parks

Demand in the study area would contribute to the higher citywide demand for parks. Locally, The Preferred Alternative has the most residential growth in 130th Street Station Area. Growth and demand for parks in the 145th Street Station Area is second highest under the Preferred Alternative. There could be increased usage at local parks and a need to increase capacity.

Schools

Under the Preferred Alternative, impacts to schools immediately in the station areas would be similar to and slightly greater than Alternative 2 with a small difference in expected students.

Solid Waste

Under the Preferred Alternative, impacts to solid waste would be similar to and slightly greater than Alternative 2 with a small increase in the number of dwelling units and waste volume.

3.11.3 Mitigation Measures

Incorporated Plan Features

The action alternatives would update the Parks and Recreation Element of the Comprehensive Plan, which would result in refreshed policies. The POS Plan is being updated in parallel with the Comprehensive Plan, and it is anticipated that the plan will address levels of service and priorities for implementation.

The City is updating its Comprehensive Plan including its public services policies and coordinating with service providers regarding growth estimates.

Compact growth in centers under all alternatives and in other areas of focus like centers and corridors in Alternatives 2 and 4 could result in more efficient service delivery. More diffuse growth in urban neighborhood areas in Alternatives 3 and 5 and the Preferred Alternative could distribute the demand more incrementally and locate more housing near existing infrastructure like schools, parks, and fire stations.

Regulations & Commitments

Police

- 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.

- SPD has developed Micro Community Policing Plans (MCPP) with community engagement and considering crime data to help direct police services to address the individual needs of each community.
- SPD has a Professional Standards Bureau to guide Seattle's Police Reform. Goals include:
  - Reduce Crime and Disorder: The Seattle Police Department strives to move beyond just responding to crime after it has occurred to proactively working toward reducing the opportunity for and disorder associated with criminal activity.
  - Service Excellence: Enforcing the law is only a portion of what the Seattle Police Department does each day. Providing service to individuals happens much more frequently than arrests. To this end, the men and women of the Seattle Police Department are continuously looking for better and more effective ways to advance policing.
  - Honor and Professionalism: Public trust, Courtesy, and Respect remain a top priority for the Department. All SPD personnel understand that this is a shared responsibility and is critical in building strong relationships with the communities of Seattle.
  - Business Efficiency: SPD has a duty to administer the resources granted to it in a responsible and effective manner and is always looking toward implementing best business practices to provide effective and skillful police services.
  - Data Driven Policies and Practices: Effective, modern policing is grounded in agile, data-driven strategies. SPD is committed to using multi-disciplinary solutions for improving the livability of the City.

Fire/Emergency Medical Services

- The Seattle Fire code specifies that any street improvements must be consistent with the Seattle Fire Code Section 503 and Appendix D, which address fire apparatus access roads and minimum standards for public right of way design to not inhibit response.
- Seattle Fire Code Section 9 also specifies that buildings of certain numbers of housing and commercial units that will be required to meet targeted growth require means of egress, sprinkler systems, and other fire protection measures. The code also specifies certain characteristics of each of these fire protection measures in new development and inspections on existing housing and commercial spaces.
- Response time commitments are available under **Response Time** in **Section 3.11.1** or as follows:
  - Call Processing Time: 60 seconds for phone answered to first unit assigned for 90% of calls.
  - Fire Response Time: Arrival within 4 minutes for the first-arriving engine at a fire for 90% of calls, and arrival within 8 minutes of the full first alarm assignment of 15 firefighters, for 90% of calls.
  - Basic Life Support: Arrival within 4 minutes of the first medical unit with two EMTs, for 90% of calls.
  - Advanced Life Support: Arrival within 8 minutes for 90% of call
- Seattle Fire has committed to limiting the number of dispatches/runs per unit to 2500 annually based on national standards and regulations (Haskell, McAuslan, 2023). This is to

ensure that staff are not overburdened, units remain in good condition, and overburdened units can be identified.

Parks

- The Seattle Land Use Code (Seattle Municipal Code Title 23) 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.
- The Seattle Shoreline Master Program requires shoreline public access for development that creates a demand.

Schools

- Ongoing Seattle School District capital facilities management planning would be required to address increases in student population. The Seattle School District prepares capital plans and projects are funded by levies.

Solid Waste

- 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.
- Seattle Public Utilities 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.
- The City produces several resources on specific hazardous waste, single use plastics, food waste, and waste composition studies which create regulations and policies that limit environmental impacts from pollution, microplastics entering into the food system, and waste disposal. These studies have culminated in specific policies such as the single use plastic bag ban, prioritization of durables (metal or reusable tableware) in restaurants, and a number of pilot projects aimed at creating more opportunities to recycle and compost in all parts of the city.

Other Potential Mitigation Measures

Police

SPD could update its MCPP described under “Incorporated Plan Features” or create updated police service programs to engage the community in police services that equitably and justly meet community needs.

Fire/Emergency Medical Services

Additional fire/emergency medical services mitigation measures could include:

- SFD could explore options to decrease call times through new station placement strategies that limit East/West travel which has historically been challenging for fire units during busier times of day.
- SFD could explore smaller, more nimble fire units that are better equipped to navigate Seattle's complex topography to decrease response times while still ensuring SFD's excellent standard of service for emergency medical and fire response.
- SFD could convert peak aid units that are available at certain times to full time aid units.
- SFD could add aid units in underserved areas.
- **130th/145th Station Area:** If an additional aid unit is provided at each of the nearby stations at Bitter Lake and Lake City, SFD can maintain and even improve the service levels of the station area ~~and~~ while avoiding crossing Interstate-5 at congested times of the day.

Parks

- The City could explore a population density or access-based level of service approach given the urban nature of the city as identified in the ~~draft~~ Parks and Open Space Plan ~~March~~ May 2024.
- The City could add additional or improve existing park space including:
  - Expanding existing parks or adding capacity on existing parks (e.g., expanded play or sports facilities),
  - Creating linear parks and trails,
  - Increasing tree canopy coverage in rights-of-way or public parks and open space to reduce urban heat island effects,
  - Developing recreation facilities on building rooftops to provide sports courts, athletic fields, off-leash dog areas, etc.,
  - Developing community gardens (permitted on some rooftops in individual zones) as a way to provide open space and urban agricultural use,
  - Increasing frequency of maintenance to offset an increase in park usage.
- The City could implement a parks impact fee to help pay for the development of new park land if needed in the future.
- The City could also explore transportation to and from parks and potentially increase connectivity between parks in areas of high equity opportunity.

Schools

- The City could implement a school impact fee to help pay for the development of new classrooms if they are needed in the future.
- The City could help identify interim uses for existing underutilized classrooms so that the school district can hold onto them in case they are needed in the future.
- The City could incentivize provision of public schools in centers in vertical formats, where new schools are needed. The City could also allow for greater heights at existing school

locations where demand increases. Goals would be to protect recreation and tree canopy while allowing for more student classroom capacity.

- The City could update development standards and review processes for new schools in order to make it easier to add classrooms or build new schools if they are needed in the future.
- As part of development standards for new place types such as neighborhood centers and corridors, the City could enhance street crossing including walking routes to schools in areas with added housing.
- The City could identify specific objectives to assist Seattle Public Schools in acquiring and developing new schools if needed.

Solid Waste

Additional solid waste mitigation measures may be needed to help the City reach its goals of 70% diversion of waste to recycling and compost. These measures are as follows:

- Increasing budget for education and outreach services for multi-family residents.
- Establishing more significant penalties for those who do not adhere to recycling and composting standards while increasing financial benefits for households and multi-family residents who opt for recycling and compost over landfill waste disposal.
- Require specific standards in solid waste hauling contracts to protect employees from adverse health impacts of their work during extreme weather events.

3.11.4 Significant Unavoidable Adverse Impacts

Police

There will be an increase in population and jobs and an increase in demand for police services. However, there are mitigation measures to invest in resources to address needs and provide adequate services.

Fire/Emergency Medical Services

It is anticipated that increased demand for fire/emergency medical services can be accommodated due to ~~the~~ changes in staffing for fire prevention education, increased capacity at station facilities, and either redistributing or increasing the number of units at each station. Consequently, no significant unavoidable adverse impacts are to be expected.

Parks

All alternatives will exceed the existing level of service and increase demand for parks and recreation facilities. With mitigation (adding parks, making better use of existing parks, or ~~updating~~ implementing the updated parks LOS) significant adverse impacts can be avoided.

Schools

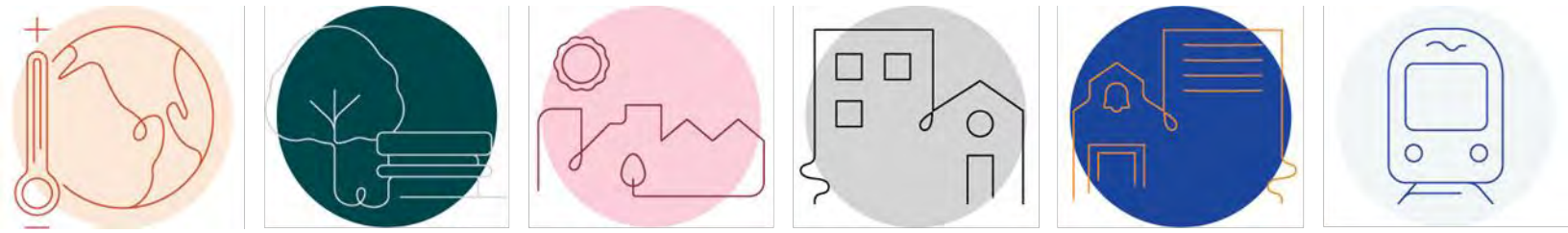
All studied alternatives would result in increases in students. This could require additional school capacity unanticipated in current district plans. However, it is anticipated that Seattle Public Schools could respond to any new growth that may occur through regular capital planning and coordination. Consequently, no significant unavoidable adverse impacts are anticipated.

Solid Waste

It is anticipated that Seattle Solid Waste will be able to accommodate expected increases in solid waste service through regular contract renegotiation and ongoing maintenance and upkeep of capital facilities. Consequently, no significant adverse impacts are anticipated.

Intentionally blank

3.12 Utilities





Seattle City Light. Source: City of Seattle, 2023.

This section evaluates the potential impacts to utilities that may result from the five alternatives. Utilities evaluated in this section include the public water system, the wastewater and drainage system, and the electrical system.

Thresholds of significance utilized in this impact analysis include:

- Impacts that would be inconsistent with plans for future utility improvements, development, or growth.
- Impacts that would require major unplanned capital improvements for the utility to serve new development.

3.12.1 Affected Environment

Citywide

Water

Seattle Public Utilities (SPU) provides drinking water to approximately 1.5 million people living in Seattle and surrounding communities in western King County and portions of southern Snohomish County. The city's water supply comes primarily from surface water reservoirs on the Cedar River, which supplies 60 to 70%, and South Fork Tolt River, which supplies the remainder. SPU also manages a small wellfield that can be used to supplement the surface water sources if needed (SPU 2019a).

A roughly equal amount of water is provided to retail and wholesale customers through approximately 1,820 miles of transmission and distribution lines, as shown in **Exhibit 3.12-1**. SPU's water system has an estimated yield of 172 million gallons per day (mgd), although actual consumption has been much less and declining over time, with per capita consumption 44% less in 2019 than in 1990. Over the past five years, total consumption has averaged about 121 mgd (SPU 2019a).

SPU does not have any planned efforts to increase water supply prior to 2060. Despite an anticipated household growth rate of 18% in its retail service area and 29% in its full and partial wholesale customers between 2016 and 2040, SPU anticipates that total demand is forecast to remain relatively flat due to continued efforts to conserve water and changes to its wholesale water customers (SPU 2018). Current capital investments for SPU include those for maintenance of existing infrastructure including dams, watermain rehabilitation in the distribution system, seismic improvements, and ensuring the water system's resiliency under climate change.

Exhibit 3.12-1. Seattle Regional Water Supply System



Source: SPU, 2019a.

Wastewater & Drainage

SPU manages wastewater and drainage systems in Seattle, which include the combined sewer system, the sanitary sewer system, and the stormwater drainage system. The City contains three different types of areas: the combined sewer area (with only combined sewer systems), separated sewer areas (with sanitary sewer and stormwater drainage systems), and partially separated sewer areas (with sanitary sewer and stormwater drainage systems, where some rainwater still goes to the sanitary sewer), each covering about one-third of the city as shown in **Exhibit 3.12-2**. The King County Wastewater Treatment Division operates the West Point treatment plant—one of the County's three regional wastewater treatment plants—in addition to four combined sewer overflow (CSO) treatment facilities within the city of Seattle (King County 2022) and the wastewater trunkline system that serves Seattle. The majority of wastewater collected from within Seattle is treated at the West Point plant, which is supported by the Brightwater plant near Woodinville if needed (King County 2023a, King County 2023b).

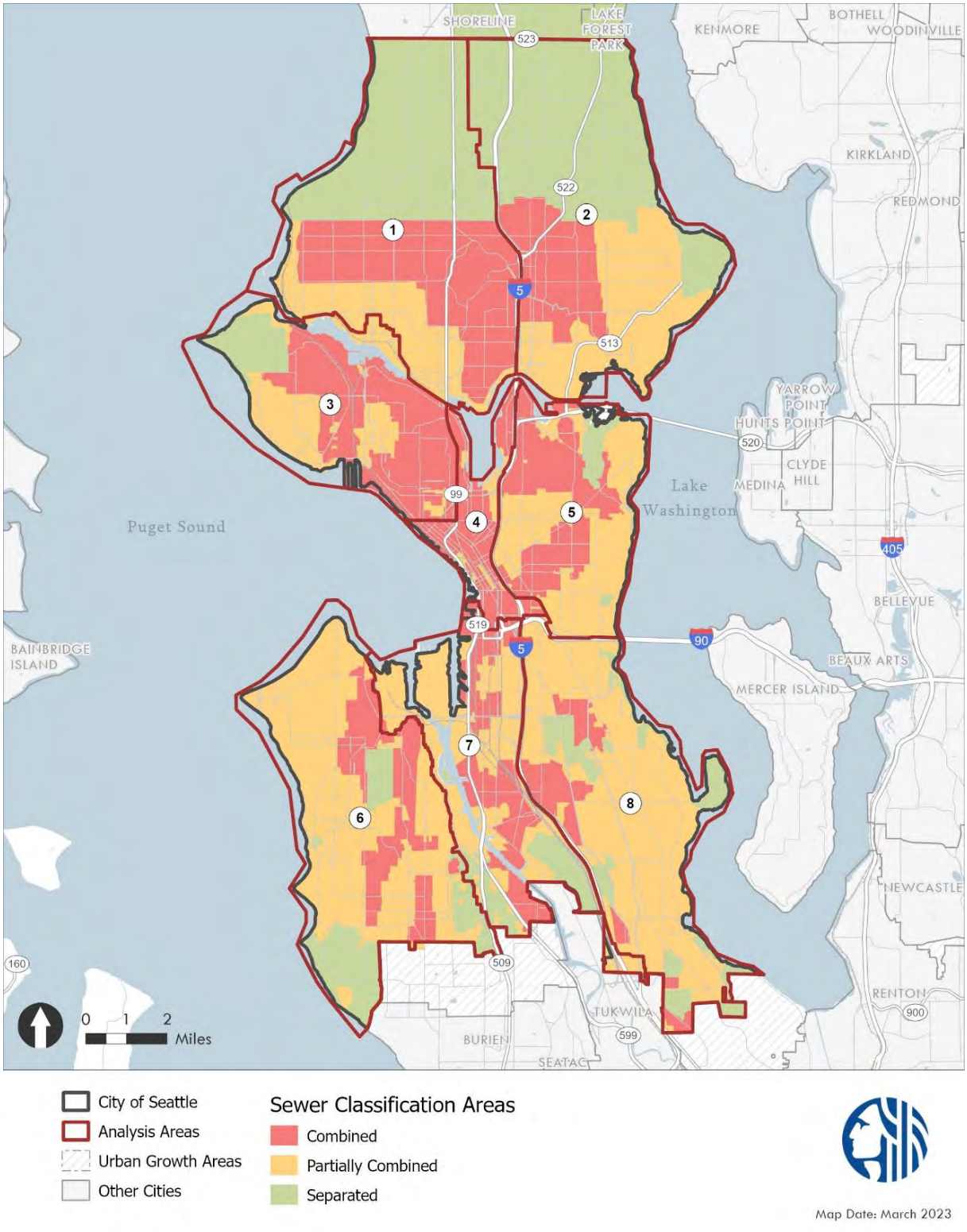
The combined sewer system is the oldest system conveying wastewater and drainage in Seattle, with infrastructure 100 years old or more in places (SPU 2023a). The combined sewer system collects wastewater from residents and businesses along with stormwater runoff from rooftops, yards, and streets into the same pipes, where it is then conveyed to the treatment plant. During periods of heavy rain, the system can overflow into waterbodies such as Lake Washington and Elliott Bay. While CSOs prevent wastewater treatment plants from being overwhelmed and prevent the wastewater system from backing up into roads and buildings, they contribute pollutants to receiving waterbodies. This degrades water quality, which impacts the aquatic life and habitat within these waterbodies and inhibits recreational opportunities.

In the separated sewer system wastewater from homes and businesses is collected through a separate set of pipes than stormwater. Wastewater is sent to the treatment plant while drainage collected from rooftops, yards, and streets is conveyed to waterbodies. Pollutants picked up by stormwater from rooftops and streets can impact water quality and the aquatic life in receiving waterbodies.

In the partially separated sewer system, stormwater runoff from the rooftops of older construction is collected along with wastewater from homes and businesses and conveyed through the wastewater system to the treatment plant. As in the separated system, stormwater runoff from yards, streets, and new development is conveyed to waterbodies.

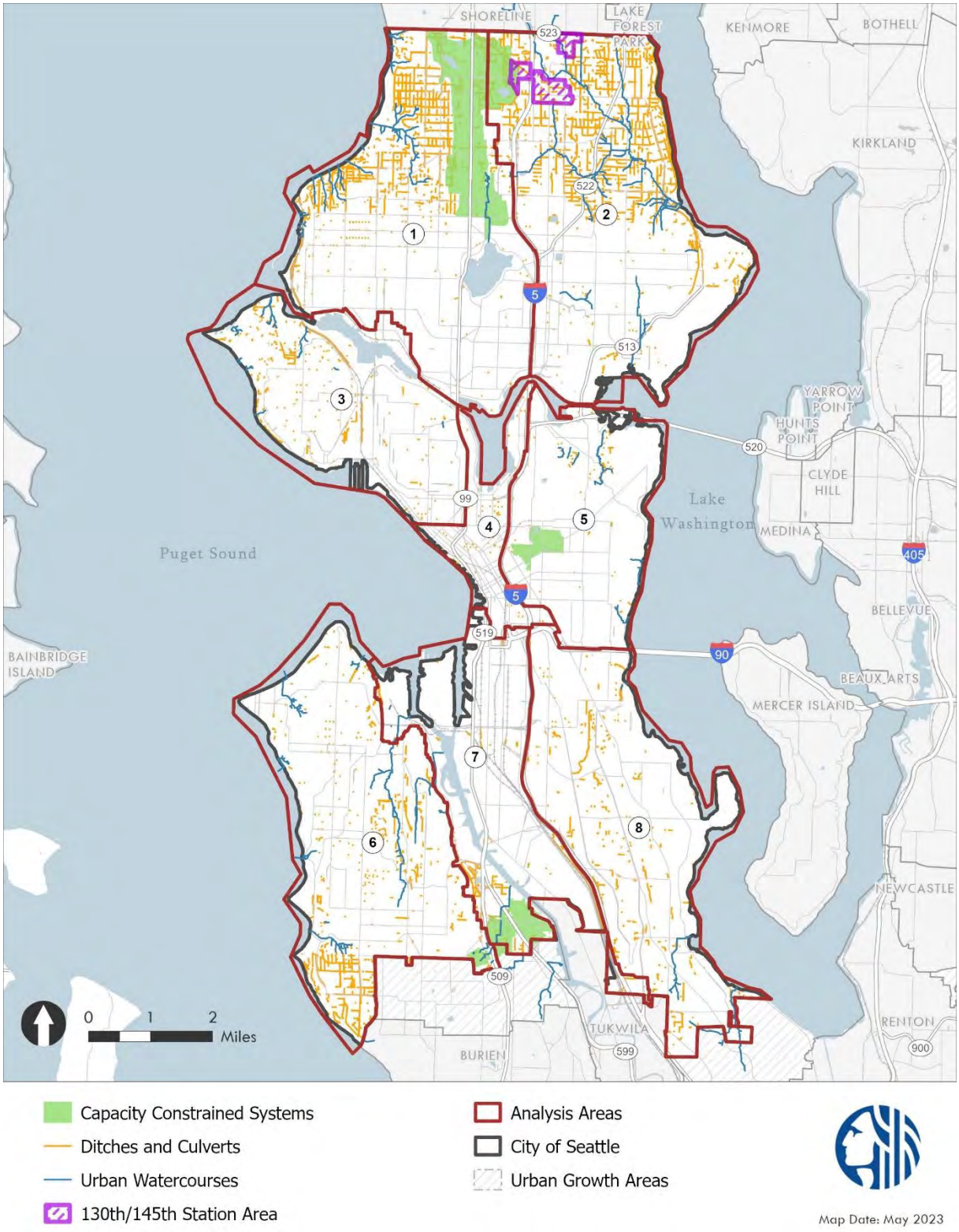
While the vast majority of SPU's drainage system is piped, Seattle has areas that are served by a predominantly 'informal' drainage system, particularly north of 85th Street and in the southwest corner of Seattle. These areas include blocks with no, or only limited drainage infrastructure and several miles of ditch and culvert systems. According to Seattle's Stormwater Code (Seattle Municipal Code [SMC] Title 22, Subtitle VIII) ditch and culvert systems are considered capacity constrained, meaning they have inadequate capacity for existing and anticipated stormwater loads. **Exhibit 3.12-3** shows the wastewater and drainage systems considered capacity constrained.

Exhibit 3.12-2. Drainage Areas by Type



Source: City of Seattle GIS, 2023; Parametrix, 2023.

Exhibit 3.12-3. Capacity Constrained Wastewater and Drainage Systems



Source: City of Seattle GIS, 2023; Parametrix, 2023.

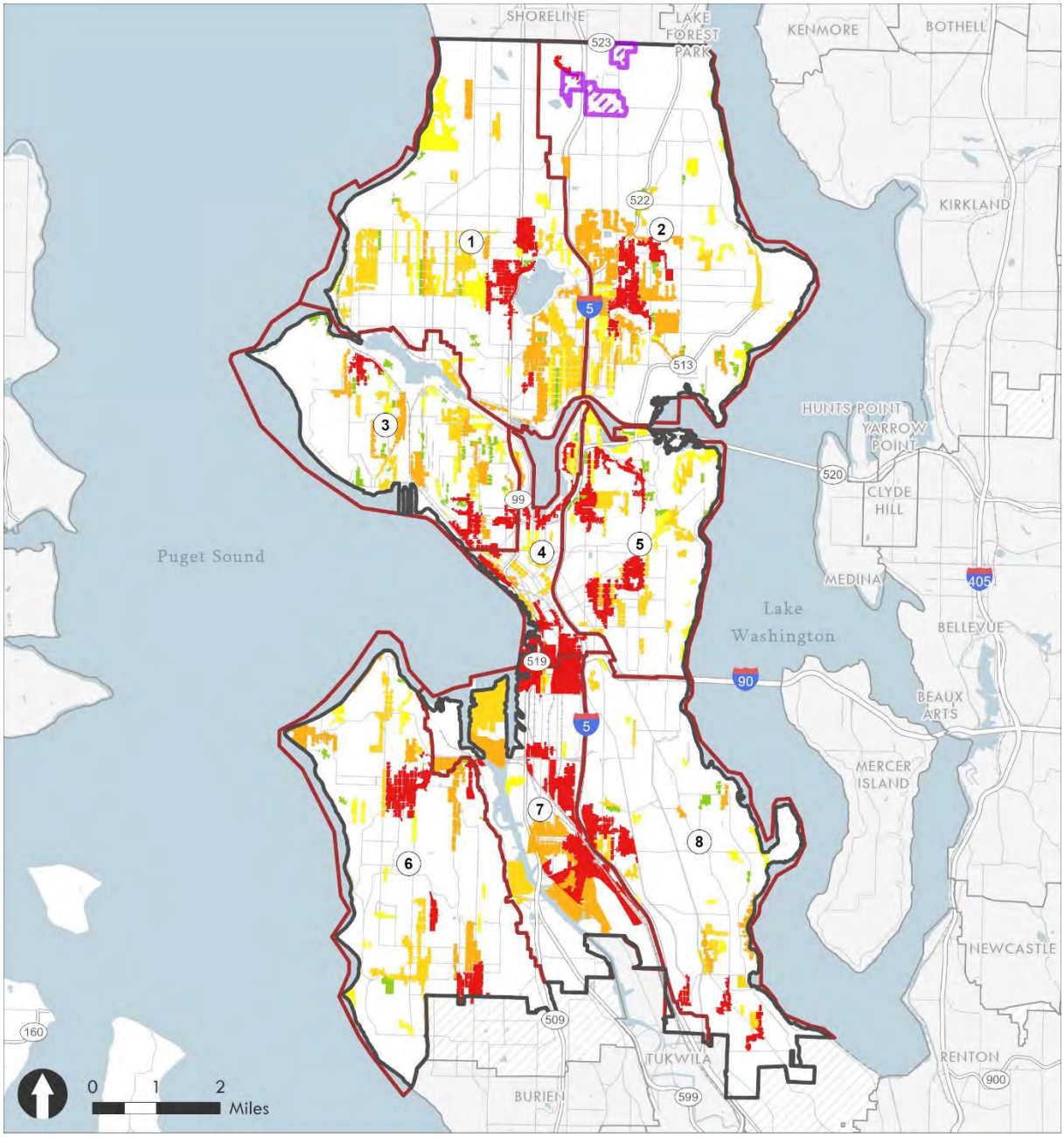
Development must meet certain requirements for flow control and possibly treatment depending on the characteristics of the project and the type of system to which it discharges or conveys runoff. Development within the combined sewer area is subject to flow control requirements, while projects within creek basins, discharging to wetlands, or conveying runoff through ditch and culvert systems are subject to both flow control and water quality treatment requirements.

In 2019 SPU published a Wastewater System Analysis (WWSA) that identifies areas at risk due to limited wastewater system capacity, which can cause sewer overflows through maintenance holes or backups into homes or businesses (SPU 2019b). In 2020, SPU completed a Drainage Systems Analysis (DSA) that identified areas at greatest risk from limited drainage system capacity, which could cause flooding in the right-of-way or onto private property (SPU 2020). These analyses simulated SPU's wastewater and drainage system performance under different design storms that represented differing amounts of rainfall in a 24-hour period and calculated risks based on the likelihood and consequences of flooding and sewer overflows, as well as areas of racial and socioeconomic disparity. The WWSA and DSA both used the best available growth and climate change projections at the time to assess how the identified risks might be impacted in the future.

The WWSA and DSA were developed to assess risks associated with system capacity citywide in order to prioritize SPU investments in sewer and drainage capacity improvements in the future through the Shape Our Water planning effort. They were not developed to inform development decisions. Both WWSA and DSA used modeling to simulate system performance at the citywide scale and risk areas identified have not necessarily been confirmed by real-world instances of flooding, sewer overflows, or sewer back-ups. The WWSA and DSA both used conservative assumptions to identify risks with the assumption that additional ground-truthing would be necessary before making decisions on specific capital improvements. This approach may have resulted in an overprediction of areas at risk due to sewer and drainage capacity. **Exhibit 3.12-4** shows areas with higher risk due to limited wastewater system capacity**. Exhibit 3.12-5** shows areas with higher risk due to limited drainage system capacity.

In addition, the WWSA and DSA modeled sewer and drainage system capacity under future conditions for the 2035 planning horizon and ran simulations to evaluate the potential changes in flooding, sewer overflows, and sewer back-ups caused by changes in impervious cover, stormwater code compliance, sea level rise, and more frequent and extreme rainfall events. The WWSA found that "Citywide, the percent of surcharged pipe length increased slightly from 30% under existing conditions to 33% under future conditions for the 5-yr, 24-hour storm. Simulated MH [maintenance hole] flooding increased to a lesser degree from 6% under existing conditions to 7% under future conditions (SPU 2019b)." The DSA found that "Redevelopment can result in additional impervious surface areas which can increase peak flows and affect conveyance capacity. Due to the City's stormwater code requirements, new or replaced impervious surface areas associated with development may require flow control which mitigate the increased flows and sometimes decrease existing flows (SPU 2020)."

Exhibit 3.12-4. Wastewater System Capacity Priority Areas



Wastewater System Capacity Priority Areas

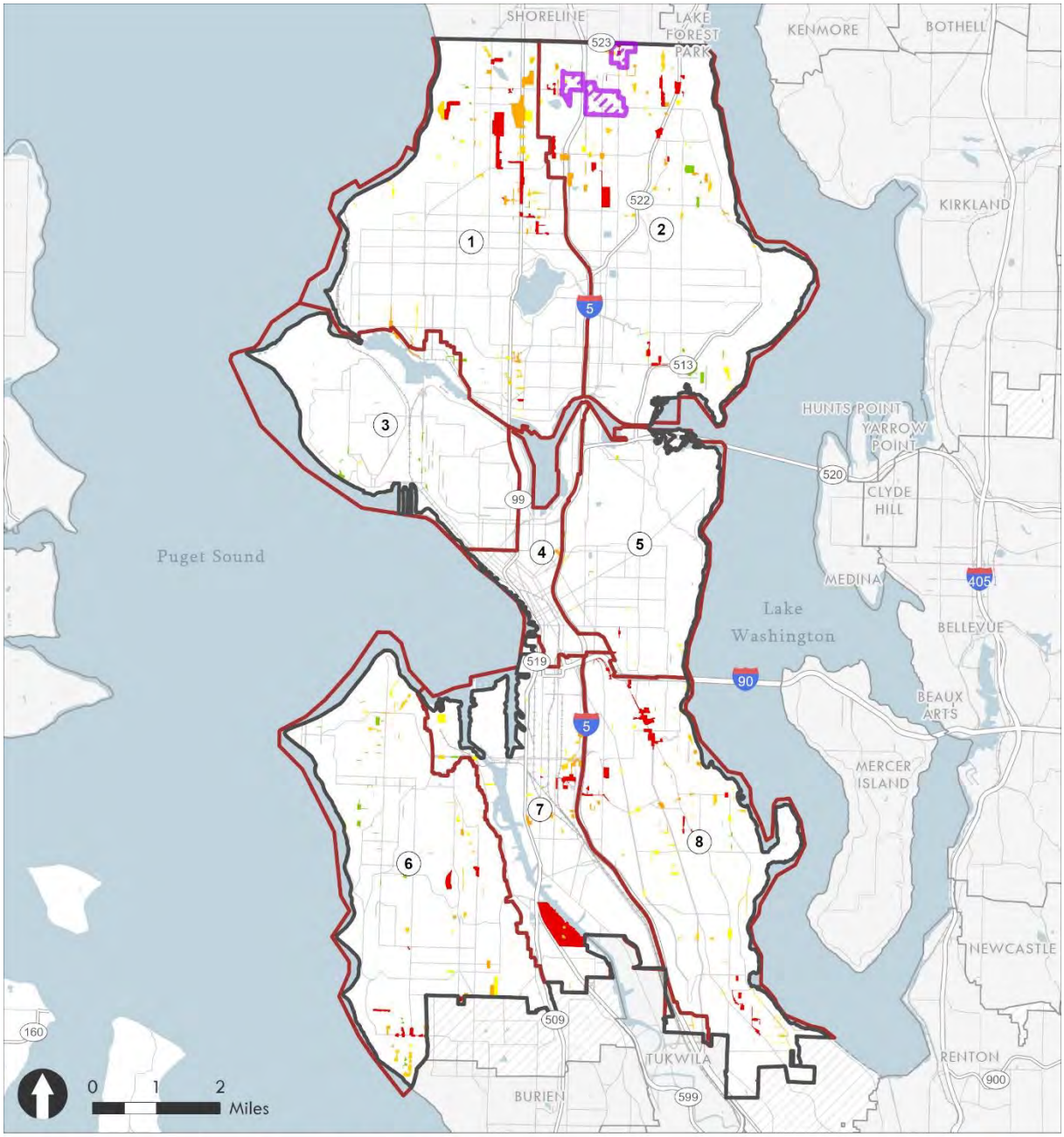
Relative risk categories

- Critical
- High
- Medium
- Medium-low
- Low
- 130th/145th Station Area
- City of Seattle
- Analysis Zones
- Urban Growth Areas

Map Date: June 2023

Source: SPU, 2019b; Parametrix, 2023.

Exhibit 3.12-5. Drainage System Capacity Priority Areas



Source: SPU, 2020; Parametrix, 2023.

SPU's major capital investments currently include several projects to restore creeks, reduce flooding, improve sewer capacity, increase green stormwater infrastructure, and reduce CSOs. SPU's largest CSO control project is the Ship Canal Water Quality Project, which is being done in partnership with King County, and will prevent an average of 75 million gallons of polluted stormwater and sewage from entering waterways each year (SPU 2023b). SPU is also currently developing a plan for Seattle's water future, called Shape Our Water: A 50-year Plan for Seattle's Water Resilience.

Also in 2019, King County published the Treatment Plant Flows and Loadings Study, which evaluates the capacity of its wastewater treatment plants in terms of handling overall volume of wastewater and stormwater flow in addition to the amount of organic and solids load (King County 2019). In its evaluation, the County used population estimates and projections based on 2013 PSRC forecasts, adjusted for the higher growth rate the region experienced between 2010 and 2016. Based on the results, the West Point treatment plant is projected to be able to handle maximum month flow until 2050 but is already reaching capacity for maximum month loadings. In addition, the County will need to optimize treatment plant operations and ultimately invest in technical modifications to comply with the Puget Sound Nutrient General Permit, which became effective in January 2022. This may put further constraints on treatment plant capacity.

King County has capital projects underway at the West Point treatment plant to improve the reliability of power supply, replace and upgrade the raw sewage pump system, and construct seismic upgrades. King County has completed a number of CSO control projects in Seattle in recent years, and in addition to the Ship Canal Water Quality Project in Seattle, is working on a new CSO treatment facility in Georgetown and a 1.25-million-gallon storage facility for wastewater and stormwater in South Park. The County is also undergoing an effort to improve the capacity of the Thornton Creek sewer pipe, evaluating alternatives to reduce the infiltration and inflow of groundwater and stormwater into the pipe to reduce the risk of overflows and water quality impacts in the Thornton Creek basin.

Electricity

Seattle City Light (SCL) provides electrical power to homes and businesses in Seattle in addition to customers in communities north and south of the city. **Exhibit 3.12-6** shows the SCL service area. In 2020, SCL provided over 8.6 million megawatt-hours of power to over 425,000 residential customers and over 50,000 commercial and industrial customers (SCL 2021). A significant portion of SCL's power is generated by the utility's own hydroelectric facilities, namely the Ross, Gorge, and Diablo dams on the Skagit River north of Seattle and the Boundary Dam on the Pend Oreille River in northeast Washington. The rest of the power is purchased through other sources, including over a third of power needs from the Bonneville Power Administration (SCL 2021).

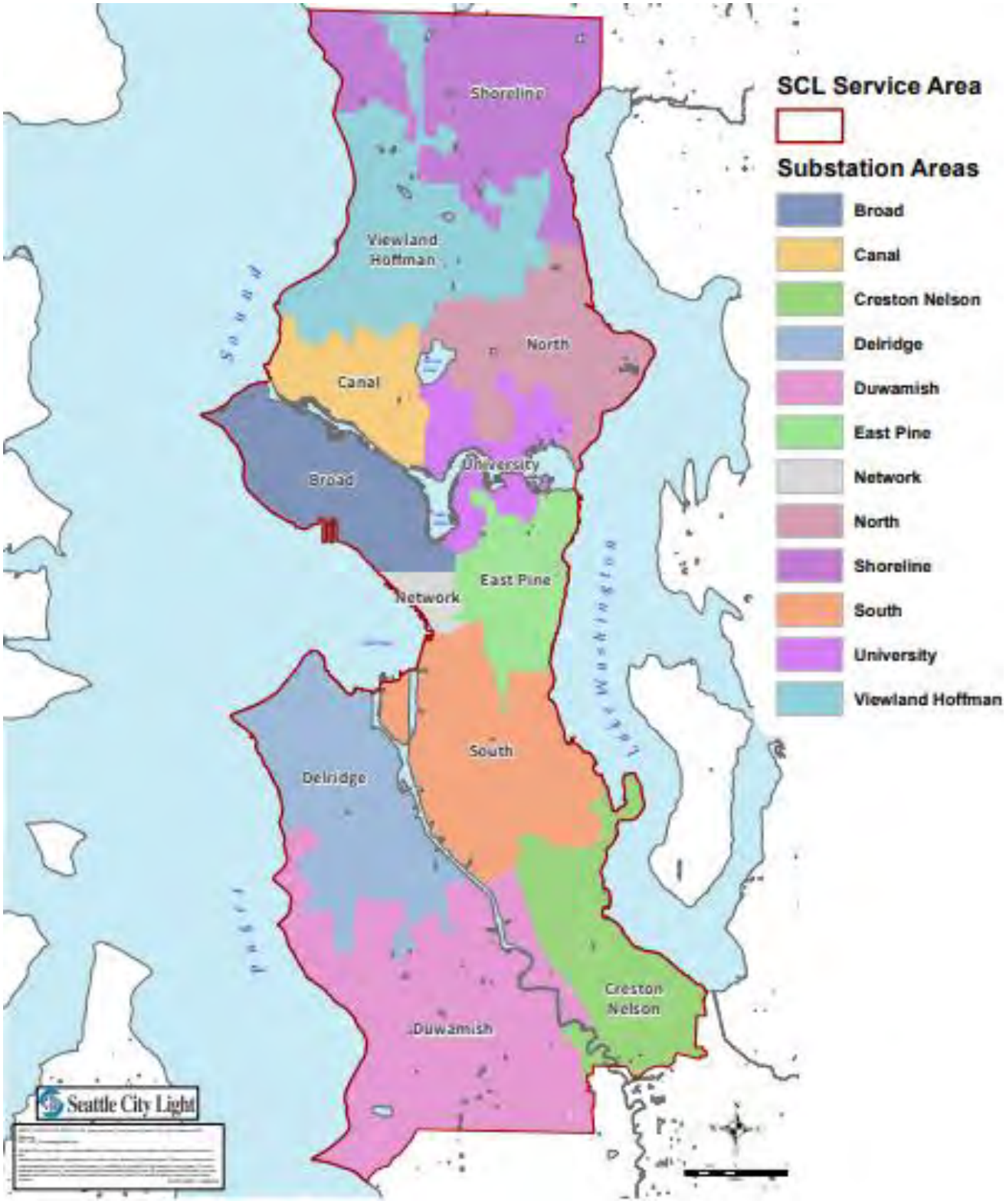
Within Seattle, SCL operates 12 substations—the newest being the Denny Substation built in 2018—that distribute power throughout the city, as shown in **Exhibit 3.12-7**. These substations lower the voltage of electricity from the high-voltage 115- and 230-kilovolt transmission lines before transferring it to the overhead and underground neighborhood distribution lines. In all, SCL manages over 2,300 miles of distribution circuit (SCL 2021). There is also a small but growing number of decentralized energy production sources, such as private solar panel arrays on residential or commercial buildings. These arrays can help supplement electrical power from SCL's system and, where large enough, can contribute electrical power back into the system.

Exhibit 3.12-6. Seattle City Light Service Area



Source: SCL, 2021.

Exhibit 3.12-7. Seattle City Light Substation Service Areas



Source: SCL, 2021.

SCL conducted an assessment in 2022 to examine the high-level impacts of electrification of buildings, transportation, and commercial and industrial applications within its service area in addition to population and commercial growth. The Seattle City Light Electrification Assessment (SCL 2022a) analyzed the impacts of electrification, such as the adoption of electric vehicles and building heating and cooling systems, under three different electrification scenarios: a Moderate Market Advancement scenario where electrification occurs based on past trajectories, a Rapid Market Advancement scenario consistent with the goals and policies of plans such as the Seattle Climate Action Plan, and the Full Adoption of Electrification Technologies scenario where all technologies would be fully electric by 2030, consistent with Seattle's Green New Deal. Each scenario included the addition of 65,000 housing units and over 69 million square feet of commercial development over the study period (SCL 2023a).

As shown in **Exhibit 3.12-8**, under all scenarios, the percent of energy use by residential and commercial uses drops relative to industrial and, particularly, transportation uses. This suggests that the adoption of electrification technologies poses a greater concern to system capacity than population growth. The study concluded that, throughout the year, SCL's electrical system has capacity available to accommodate electrification efforts—approximately 22 Terawatt hours (TWh)—although peak load demand could exceed the capacity of portions of the grid during certain times of the year as electrification efforts advance. For example, the study found that under the Full Adoption scenario winter and summer peak loads would exceed the existing system capacity in 2030 without mitigating strategies or technologies to reduce peak demand (SCL 2022a).

Exhibit 3.12-8. Comparison of Electrical Use Under Electrification Scenarios

End Use	Year 2020 Baseline TWh1 / % of Total	Year 2042 Moderate Market Advancement TWh / % of Total	Year 2042 Rapid Market Advancement TWh / % of Total	Year 2042 Full Adoption[2] TWh / % of Total
Commercial	4.52 / 49.5%	5.85 / 44.5%	6.10 / 37.6%	6.48 / 32.8%
Industrial	0.90 / 9.8%	1.38 / 10.5%	1.72 / 10.6%	2.98 / 15.1%
Residential	3.68 / 40.2%	4.89 / 37.2%	5.14 / 31.6%	5.65 / 28.6%
Transportation	0.04 / 0.5%	1.03 / 7.9%	3.28 / 20.2%	4.63 / 23.4%
Total TWh	**9.15 / 100%**	**13.16 / 100%**	**16.25 / 100%**	**19.74 / 100%**

Notes: 1) TWh = Terawatt hours; 2) In the Electrification Assessment report the Full Adoption scenario was analyzed between 2030 and 2042, assuming full electrification begins in 2030, and not compared against the 2020 baseline.
Source: SCL, 2022a.

In 2005, SCL became the first electric utility in the country to become carbon neutral and has maintained its carbon neutral status ever since. SCL continues to invest in energy conservation efforts. These include grid modernization technologies such as microgrids, automation, and demand response. SCL is also investing in public and private charging stations and working

with partner agencies to provide infrastructure and incentives for the electrification of public transit, commercial and government fleets, and personal modes of transportation (SCL 2023b).

Analysis Areas

The presence and nature of utility facilities is primarily consistent between the EIS planning areas, particularly for water and electricity. The primary differentiators for utilities between areas concerns wastewater and drainage systems, which are highlighted below.

Area 1: NW Seattle

Area 1 includes combined, separated, and partially separated wastewater and drainage systems. The northern portion of Area 1 contains a large proportion of streets with informal drainage systems and includes large areas served by ditch and culvert systems, including the capacity constrained Densmore drainage basin in which there are several under capacity drainage ditches and pipes. Short segments of capacity constrained drainage ditches are located in the Ballard and Fremont neighborhoods as well. There are some areas with medium to high risk due to wastewater system capacity with some areas identified as critical risk on the northeast side of Green Lake.

Area 1 is generally covered by the Viewland Hoffman and Canal SCL substation areas.

Area 2: NE Seattle

Area 2 includes combined, separated, and partially separated wastewater and drainage systems. The northern portion of Area 2 includes the greatest proportion of streets with informal drainage systems and areas served by ditch and culvert systems, particularly within the Thornton Creek watershed, in which there are a number of under capacity drainage ditches and pipes (see **Exhibit 3.1-7 Regulated Stream and Lake Watersheds** in **Section 3.1 Earth & Water Quality**). There are some areas with medium, high, and critical risk due to wastewater system capacity mostly within the southwest quadrant of Area 2.

Area 2 is generally covered by the Viewland Hoffman, North, and University SCL substation areas.

130th/145th Study Area

The 130th/145th Study Area is within the Thornton Creek watershed and partially within the Densmore drainage basin, which is considered capacity constrained. In addition, there are numerous streets within the study area with ditch and culvert systems, also considered capacity constrained. This area is indicated as very low risk due to wastewater system capacity.

The 130th/145th Study Area is covered by the Viewland Hoffman substation area.

Area 3: Queen Anne/Magnolia

Area 3 includes the Ballard Interbay Northend Manufacturing Industrial Center. It is primarily served by a combined wastewater and drainage system, with smaller areas served by partially separated and separated systems in the southern area of the Magnolia neighborhood and Discovery Park, respectively. Most streets are served by formal drainage systems, and there are very few drainage pipes listed as under capacity. There are some areas indicated as medium to high risk due to wastewater system capacity throughout the Area 3, with some areas indicated as critical risk within the Lower Queen Anne neighborhood.

Area 3 is covered by the Broad SCL substation area.

Area 4: Downtown/Lake Union

Area 4 includes the Downtown and South Lake Union neighborhoods that include some of the city's most densely populated areas. Wastewater and stormwater in Area 4 is conveyed almost wholly through the combined system, though there are small areas where stormwater is conveyed through the partially separated system. There are areas with medium to high risk due to wastewater system capacity throughout, with the Pioneer Square and International District neighborhoods indicated as critical risk.

Area 4 is generally covered by the Network, Broad, University SCL substation areas.

Area 5: Capitol Hill/Central District

Area 5 is served by both combined and partially separated wastewater and drainage systems, with the area including the Washington Park Arboretum served by a separated system. Nearly all streets are served by a formal drainage system, and there are very few drainage pipes listed as under capacity. The area is primarily indicated as very low risk due to wastewater system capacity except for the Madison Valley and areas in the northeast quadrant of the area, which are indicated as critical risk.

Area 5 is generally covered by the East Pine and University SCL substation areas.

Area 6: West Seattle

Area 6 in West Seattle is served primarily by a partially separated wastewater and drainage system, with smaller areas served by combined and separated systems. There is a small area within the southwestern portion of the area streets that is served by an informal drainage system, including ditch and culvert systems; this area contains drainage ditches listed as under capacity. There are short segments of under capacity drainage pipes located sparsely throughout the area. The area is primarily very low risk due to wastewater system capacity, with some medium and high risk areas, and critical risk areas in the West Seattle Junction and Delridge neighborhoods.

Area 6 is covered by the Delridge and Duwamish SCL substation areas.

Area 7: Duwamish

Area 7 includes the Duwamish Manufacturing Industrial Center. It is served both combined and partially separated wastewater and drainage systems, with smaller areas served by separated systems. It has a small proportion of streets served by a ditch and culvert system, particularly in the southwestern portion of the area. There are small concentrations of under capacity drainage pipes in the north-central and southern portions of the area. Approximately half of the area is indicated as medium, high, and critical risk due to wastewater system capacity.

Area 7 is covered by the South SCL substation area.

Area 8: SE Seattle

Area 8 is served primarily by a partially separated wastewater and drainage system, with smaller portions of the area served by combined or separated systems, including Seward Park. Most streets are served by formal drainage systems. There are under capacity drainage pipes concentrated along Rainier Avenue S in the northern end of the area, and generally in the southern end. The area is indicated primarily as very low risk due to wastewater system capacity, with a critical risk area indicated in the Beacon Hill neighborhood.

Area 8 is generally covered by the South and Creston Nelson SCL substation areas.

3.12.2 Impacts

Impacts Common to All Alternatives

Seattle would experience population and job growth under all the alternatives, which would result in an increase in demand for utility services. While the alternatives have different housing targets—job targets are the same under each alternative—the impacts to utilities as a result of the increased demand would be similar, as described below.

Water

None of the alternatives are anticipated to adversely impact water supply. As stated in **Section 3.12.1 Affected Environment**, SPU does not have any planned efforts to increase water supply during the 20-year planning horizon for the comprehensive plan. As reported in its Official Yield Estimate and Demand Forecast, SPU forecasts that future demand will remain relatively flat well below the available water supply beyond 2060 despite anticipated population and employment growth, due to continued efforts to conserve water and planned reductions in service to its wholesale water customers (SPU 2018, 2019a).

SPU currently has a forecasted surplus capacity between 35 and 40 MGD. Although all the alternatives project 80,000 to 120,000 more households by 2044 (approximately 40,000 to

80,000 more households than the estimates that factor into SPU's demand forecasts), the increase represents a modest increase to the nearly 620,000 households that SPU estimates serving regionally by 2040 (SPU 2018). The overall estimated yield of SPU's drinking water system is anticipated to support this higher growth rate through the planning period.

Individual housing and business developments would need to ensure adequate water supply for drinking water and fire suppression, which could require improvements or upgrades to the existing water distribution system and construction of new service connections where existing infrastructure is undersized. There could be variations in the extent to which water system infrastructure would need to be upgraded or added under each alternative depending on the age, extent, size, and condition of the existing infrastructure and the type of development being planned. For example, a greater degree of utility improvements may be required in urban neighborhood areas for multifamily development than in urban centers.

Wastewater & Drainage

All alternatives would result in greater demands on wastewater and drainage collection systems through a combination of population growth, water consumption, and the amount of impervious surface as a result of new development. The amount and location of increased demand, and any impacts as a result, would vary by alternative.

Development under all the alternatives would occur in areas with wastewater and, to a lesser extent, drainage capacity constraint risks as shown in **Exhibit 3.12-4** and **Exhibit 3.12-5**. All alternatives include shares of household and employment growth in regional centers and urban centers, some of which coincide with the high and critical risk areas for wastewater. This is due in part to the fact that SPU assigned a higher risk score to these areas because a sewer back-up or overflow would have a greater impact in denser areas. However, population growth alone is not likely to exacerbate capacity constraints. As stated in **Section 3.12.1 Affected Environment**, the WWSA found that the extent of surcharged wastewater pipe length would increase only slightly under future conditions, which considered effects from both climate change and population growth.

The drainage capacity constraint risk areas are generally not concentrated within regional or urban centers and, for the most part, are outside the areas targeted for the highest concentrations of growth. As with the WWSA, the DSA considered both population growth (through new development) and climate change. As stated in Affected Environment, while impervious surfaces from development can increase peak flows and affect conveyance capacity, these impacts could be mitigated by the City's stormwater code requirements for flow control.

As mentioned in Affected Environment, the West Point treatment plant is already approaching its capacity for maximum month loading (King County 2019). Treatment plant loading rates would continue to increase with population growth under all alternatives; however, the treatment plant may reach maximum month loading capacity under the action a~~A~~lternatives ~~2~~

~~through 5~~ sooner than it would under Alternative 1, No Action, due to their higher growth targets.

None of the alternatives are anticipated to adversely impact wastewater or drainage conveyance systems significantly. King County and SPU have several projects underway to improve the operation and reliability of the wastewater and drainage collection and treatment systems for anticipated future conditions, including climate change. SPU has major capital projects underway to reduce flooding, sewer back-ups, and CSO events. Major King County capital projects include those to reduce CSO events and to improve the operations and reliability of the West Point treatment plant. Over time, these projects will increase the capacity of the wastewater and drainage systems and alleviate the risk of sewer back-ups and flooding in high and critical risk areas.

Individual development projects would need to comply with building and utility codes to connect to the city's sewer and drainage systems. In addition, development projects would need to comply with the Seattle Stormwater Code and Stormwater Manual, which include requirements for stormwater flow control and treatment, including onsite management such as green stormwater infrastructure where feasible depending on development and soil conditions. Complying with these requirements helps mitigate the impacts of development on the City's wastewater and drainage systems and in some cases can result in improvements to wastewater and stormwater management through upgrades to existing sewer and drainage infrastructure and construction of new facilities where existing infrastructure is undersized or nonexistent.

While there could be variations in the extent to which wastewater and drainage infrastructure would need to be upgraded or added under each alternative depending on the extent and location of additional population growth and development, the nature of the impact between alternatives would generally be the same.

Electricity

All alternatives would result in increased demands on the electrical system due to population and job growth but are not anticipated to have adverse impacts on the electrical system. SCL currently anticipates a modest baseline demand growth of 0.5% per year between 2022 and 2032, which factors in economic growth and electrification of transportation and buildings. A rapid electrification scenario would increase demand by 32% over the baseline during that same period (SCL 2022b). While the action a~~A~~lternatives ~~2 through 5~~ target greater household increases than factored into SCL's Electrification Assessment, population growth is less of a consideration for load capacity than electrification of transportation and building systems. For either scenario, SCL will seek to increase energy supply through sustainable and resilient energy resources such as wind and solar while implementing customer demand management and energy efficiency programs (SCL 2022b).

As with the other utilities, development would need to connect to the city's power grid. This could require minor improvements or upgrades to existing electrical infrastructure and construction of new service connections where existing infrastructure is undersized or

nonexistent. While there could be variations in the extent to which electrical infrastructure would need to be upgraded or added under each alternative, the nature of the impact between alternatives would be the same.

130th/145th Station Areas

The nature of impacts to water, wastewater, and electricity would be the same as described above in **Impacts Common to All Alternatives**. The 130th/145th Station area is within the Thornton Creek watershed and partially within the Densmore stormwater basin, which is capacity constrained, and includes many blocks with an informal drainage system, including some ditch and culvert systems. Increases in impervious surface due to new development could increase peak flows and potentially affect conveyance capacity. Development in this area would be subject to more stringent stormwater management requirements to avoid adversely affecting conveyance capacity and to protect water quality. These requirements could include flow control and treatment or the construction of formal stormwater drainage facilities if none are present.

Equity & Climate Vulnerability Considerations

Utility infrastructure is vulnerable to the impacts of climate change in a variety of ways.

Seattle's water supply comes from the Cedar and Tolt Rivers, which rely on winter snowpack and precipitation. Lower winter snowpacks due to drought and changes to precipitation patterns would reduce water recharge to these rivers. Even with these risks from climate change, the City is expected to have sufficient water to meet future demand; however, periods of prolonged drought could affect water supply during the dry summer and fall months.

The City's wastewater and drainage systems are vulnerable to sea level rise that could inundate conveyance pipes and facilities, particularly those facilities that lie within the 100-year floodplain. These facilities include CSO and drainage mainlines, pumps, and the West Point treatment plant. Impacts from sea level rise could be exacerbated by more frequent and extreme precipitation events could increase the potential for sewer back-ups, causing flooding and water quality impacts through CSO events.

Seattle's electrical power relies on hydroelectric sources, which rely on water supplies vulnerable to reduced winter snowpacks and drought. Warmer average temperatures and more frequent extreme heat days lead to greater average and peak demand and can overwhelm electrical supply and distribution systems. More frequent and extreme storm events can damage transmission lines and cause power outages.

The effects of climate change have disparate impacts on both populations and locations within Seattle, particularly for socially and economically vulnerable populations. These impacts can be worse for sensitive groups living in areas more susceptible to climate change, such as those areas more prone to flooding or those that experience greater heat island effects. The Seattle Climate Vulnerability Assessment identifies the International District, Duwamish Valley, South Park, Georgetown, SODO, and Rainier Valley as neighborhoods with sensitive populations that

are vulnerable to flooding and extreme heat events (City of Seattle 2023). Except for the International District, these neighborhoods coincide with Areas 7 and 8. These areas experience a very small to modest share of new households under all alternatives, ranging between 1.9% to 3.0% for Area 7 and 7.9% to 11.6% for Area 8.

The City of Seattle and King County are working to address these vulnerabilities. In addition to capital improvements to protect and reinforce existing infrastructure, SPU, King County, and SCL have projects and programs in place to proactively adapt their respective facilities. These include constructing additional underground storage for combined wastewater flows, incentivizing water and power conservation to reduce demand, and promoting renewable energy and distributed power sources, such as residential solar panels, to bolster supply.

New construction contemplated by the plan alternatives has the possibility of improving climate resiliency by replacing or upgrading aging infrastructure. For example, while new development can result in a greater amount of impervious surface that could add greater stormwater flows to capacity constrained systems, it can also result in on-site stormwater management facilities, including green stormwater infrastructure, as well as upgrades to public wastewater and drainage infrastructure.

In addition, new construction is subject to current development codes, which results in greater energy and water efficiency than in older development and would result in overall less electrical and water demand per capita. However, as buildings and transportation become more electrified—also a strategy to address climate change—more overall demand will be put on SCL's electrical system.

Impacts of Alternative 1: No Action

Under Alternative 1, No Action, growth would continue as planned under the 2035 Comprehensive Plan. Residential growth would be directed primarily to ~~regional~~ existing urban centers and ~~urban centers~~villages. Employment would follow the same pattern, in addition to being directed to manufacturing and industrial centers. As the City has been planning for and directing growth to these areas, there would be no adverse impacts to utilities.

130th/145th Station Areas

Impacts to utilities would be the same as described above for the 130th/145th Station Areas under **Impacts Common to All Alternatives**. Development in this area would be subject to more stringent stormwater management requirements, which could include flow control and treatment, to avoid adversely affecting conveyance capacity and to protect water quality.

Equity & Climate Vulnerability Considerations

Alternative 1 directs approximately 8,500 households to Areas 7 and 8, primarily to existing urban villages~~centers~~ in Area 8. These areas include neighborhoods that have vulnerable

populations and are more susceptible to climate change impacts such as flooding and heat island effects. Growth in these areas may require a greater degree of investment in improved drainage and electrical utilities to overcome these vulnerabilities.

Impacts of Alternative 2: Focused

Under Alternative 2, growth would be directed to areas of focused growth, or neighborhood centers, in addition to the regional and ~~regional~~ urban centers (urban centers and urban villages under the current plan) as described under Alternative 1, No Action. Alternative 2 targets 100,000 new housing units, 20,000 households above Alternative 1, No Action. This alternative would result in more intense growth in areas that are currently less developed, such as in areas zoned as Neighborhood Residential.

Utility infrastructure within regional and ~~regional~~ urban centers would be expected to accommodate planned growth; however, focused and denser development within neighborhood center locations would likely require utility upgrades or expansion, particularly for stormwater management in Areas 1 and 2, which would accommodate the greatest amount of growth outside the Downtown Regional Center. Improvements could include on-site stormwater management, construction of green stormwater infrastructure, and new and upgraded drainage systems in association with development.

Areas 1 and 2 are characterized by single-family development and have extensive informal drainage systems, including ditch and culvert systems, particularly within the Piper and Thornton Creek watersheds (**Exhibit 3.12-3**). Development in Areas 1 and 2 could add stress to drainage systems that are already capacity constrained, including within the capacity constrained Densmore basin, beyond that of Alternative 1, No Action. These constraints could limit housing development where requirements for flow control or treatment prove too costly or are physically infeasible.

130th/145th Station Areas

The 130th/145th Station Area under Alternative 2 would consist of three neighborhood centers with more intense combination of residential and commercial development than under Alternative 1, No Action, including over 260 more jobs and over 2.6 times the number of housing units. This would lead to greater demand on utilities than under Alternative 1, along with a greater need for potential utility improvements within the area, particularly related to stormwater management in an area designated as capacity constrained.

Equity & Climate Vulnerability Considerations

Alternative 2 adds over 10,000 households in Areas 7 and 8, primarily in ~~regional~~ urban centers and a limited number of neighborhood centers. These areas include neighborhoods that have vulnerable populations and are more susceptible to climate change impacts such as flooding

and heat island effects. Growth in these areas may require a greater degree of investment in improved drainage and electrical utilities to overcome these vulnerabilities.

Impacts of Alternative 3: Broad

Under Alternative 3, growth would be directed to new housing types throughout urban neighborhood areas, in addition to the regional and urban centers as described under Alternative 1, No Action. As with Alternative 2, Alternative 3 targets 100,000 new housing units, 20,000 households above Alternative 1, No Action. 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, particularly in areas characterized by large-lot single-family zones. These upgrades could be beneficial when replacing outdated or undersized facilities.

Under Alternative 3 a large proportion (nearly 38%) of growth would be within Areas 1 and 2, due to the extent of designated urban neighborhood land within those areas. As described above, development in these areas could add stress to drainage systems that are already capacity constrained, beyond that of Alternative 1, No Action, and Alternative 2 Focused. These constraints could limit housing development where flow control or treatment prove too costly or are physically infeasible. This concern would apply to other areas of the city with informal drainage systems, such as in the southwest corner of Area 6.

Equity & Climate Vulnerability Considerations

Alternative 3 adds over 12,000 households in Areas 7 and 8, primarily in ~~regional~~ urban centers and urban neighborhoods in Area 8. These areas include neighborhoods that have vulnerable populations and are more susceptible to climate change impacts such as flooding and heat island effects. Growth in these areas may require a greater degree of investment in improved drainage and electrical utilities to overcome these vulnerabilities.

Impacts of Alternative 4: Corridor

Alternative 4 would allow for a variety of housing types along transportation corridors in addition to directing growth to regional and regional centers. As with Alternatives 2 and 3, it targets 100,000 new housing units, 20,000 households above Alternative 1, No Action. Under this scenario, Area ~~1~~ 2 receives the greatest amount of growth outside the Downtown Regional Center.

As under Alternative 3 Broad, the addition of multifamily homes of various sizes—duplexes up to sixplexes—would likely require new water and electrical service connections and potential upgrades to wastewater and drainage facilities to accommodate greater population and

development density. Benefits from new development related to utility improvements would be concentrated along corridors, but not as focused as under Alternative 2.

Alternative 4 ~~has the largest~~also has a large share of population growth (over 38%) within Areas 1 and 2 ~~as compared to the other alternatives~~. As described above, development in these areas could add stress to drainage systems that are already capacity constrained. The areal extent of potential development within these areas would be greater than Alternatives 1 and 2 but less than under Alternative 3, as it would be focused along corridors. These constraints could hamper growth where requirements for flow control or treatment prove too costly or are physically infeasible. This concern would apply to other areas of the city with informal drainage systems, such as in the southwest corner of Area 6.

Equity & Climate Vulnerability Considerations

Alternative 4 adds nearly 12,000 households in Areas 7 and 8, primarily in ~~regional~~ urban centers and along corridors in Area 8. These areas include neighborhoods that have vulnerable populations and are more susceptible to climate change impacts such as flooding and heat island effects. Growth in these areas may require a greater degree of investment in improved drainage and electrical utilities to overcome these vulnerabilities.

Impacts of Alternative 5: Combined

Under Alternative 5, growth would be targeted within existing and expanded regional centers and urban centers, within neighborhood centers, and within expanded housing options along corridors and throughout urban neighborhoods. Alternative 5 targets 120,000 new housing units, 40,000 units above Alternative 1, No Action, which would lead to ~~the greatest~~a greater demand on utilities as compared to ~~the other alternatives~~Alternatives 1 through 4. Similar to the other alternatives, Areas 1 and 2 would accommodate the greatest amount of growth, over 37%.

The addition of 40,000 more housing units over the course of the planning period would likely exacerbate risks due to wastewater and drainage system capacity without improvements to those existing systems. However, as described for the other alternatives, development under this scenario would require improvements and upgrades to existing utilities and construction of new facilities to accommodate the increased density, which could offset the impact of increased growth.

The addition of 120,000 total housing units throughout the city may run into greater constraints than under ~~the other alternatives~~Alternatives 1 through 4 if necessary utility improvements prove too costly or physically infeasible to support new development within capacity constrained drainage basins, areas served by informal drainage systems, or within creek basins. For example, as discussed above, development in the northern portions of Areas 1 and 2 could add stress to drainage systems that are already capacity constrained and would be subject to more stringent stormwater management requirements for flow control and

treatment. These constraints may limit the overall number of households that could be developed in those areas.

130th/145th Station Areas

The 130th/145th Station Area under Alternative 5 would consist of an urban center on both sides of I-5 around the Sound Transit light rail station and a neighborhood center at NE 145th Street. This includes over 1,000 jobs and over 2,700 housing units and would result in a more intense combination of residential and commercial development than under Alternatives 1 or 2 over a larger area. Demand on utilities would be greater than under Alternatives 1 and 2. While new development has the benefit of improving utility infrastructure, this development would occur within a capacity constrained stormwater basin, which may be a constraint on the extent of new development and resulting increase in impervious surface if stormwater cannot be managed on site or through improved conveyance infrastructure.

Equity & Climate Vulnerability Considerations

Alternative 5 adds approximately 17,500 households in Areas 7 and 8, primarily in ~~regional~~ urban center and urban neighborhood areas in Area 8. These areas include neighborhoods that have vulnerable populations and are more susceptible to climate change impacts such as flooding and heat island effects. Growth in these areas may require a greater degree of investment in improved drainage and electrical utilities to overcome these vulnerabilities.

Impacts of Preferred Alternative

Note: The impacts analysis for the Preferred Alternative was added since the Draft EIS.

Growth patterns under the Preferred Alternative would be similar to Alternative 5, as it includes the same target of 120,000 new housing units. As a result, it would lead to a similar demand on utilities as Alternative 5 and a greater demand as compared to Alternatives 1 through 4.

As with Alternative 5, the addition of 40,000 more housing units over the course of the planning period would likely exacerbate risks due to wastewater and drainage system capacity. However, as described for the other alternatives, development under this scenario would require improvements and upgrades to existing utilities and construction of new facilities to accommodate the increased density, which could offset the impact of increased growth.

Growth under the Preferred Alternative may run into similar constraints as Alternative 5 if utility improvements prove too costly or physically infeasible to support new development within capacity constrained drainage basins, areas served by informal drainage systems, or within creek basins. Of all the alternatives, the Preferred Alternative would direct the greatest share of growth (41%) to Areas 1 and 2, which could add stress to drainage systems that are already capacity constrained and would be subject to more stringent stormwater management

requirements for flow control and treatment. These constraints may limit the overall number of households that could be developed in those areas.

130th/145th Station Area

As with Alternative 5, the 130th/145th Station Area under the Preferred Alternative would consist of an urban center on both sides of I-5 around the Sound Transit light rail station and a neighborhood center at NE 145th Street. However, it would include approximately 650 jobs and 2,200 housing units, less than Alternative 5 and over a slightly smaller extent. However, as described for Alternative 5, this development would occur within a capacity constrained stormwater basin, which may be a constraint on the extent of new development and resulting increase in impervious surface if stormwater cannot be managed on site or through improved conveyance infrastructure.

Equity & Climate Vulnerability Considerations

The Preferred Alternative adds approximately 12,300 households in Areas 7 and 8, primarily in urban center and urban neighborhood areas in Area 8. These areas include neighborhoods that have vulnerable populations and are more susceptible to climate change impacts such as flooding and heat island effects. Growth in these areas may require a greater degree of investment in improved drainage and electrical utilities to overcome these vulnerabilities.

3.12.3 Mitigation Measures

Incorporated Plan Features

None of the alternatives described in **Chapter 2** of this EIS include plan features that explicitly address utilities. However, the Comprehensive Plan includes a Utilities Element that lists policies and goals to ensure safe, reliable, and equitable service and growth throughout the city; protect water quality; and encourage energy efficiency and renewable resources. In addition, the City is adopting a climate element that would include greenhouse gas reduction measures and climate resilience measures.

Regulations & Commitments

Drinking Water

Federal

- Safe Drinking Water Act, 42 USC 300 et seq., Chapter 6A, administered by the U.S. Environmental Protection Agency

State

- Water Systems, WAC Title 246, Chapters 290-296, administered by the Washington State Department of Health

Local

- Utilities, SMC Title 21, Subtitle I – Water, administered by SPU
- Building and Construction Codes, SMC Title 22, includes plumbing and fire codes, administered by SDCI
- City of Seattle Standard Specifications for Road, Bridge, and Municipal Construction

Wastewater & Combined Sewer

Federal

- National Environmental Policy Act United States Code (USC) 4321 et seq.
- Clean Water Act, 33 United States Code (USC) 1251 et seq., including Section 402 – National Pollutant Discharge Elimination System (NPDES)

State

- State Environmental Policy Act RCW Title 43.21C; WAC 197-11
- Washington State Department of Ecology, WAC Title 173, Chapters 200-270, which includes administration of the NPDES program, discharge and effluent standards, the waste discharge general permit program, construction of wastewater treatment plants, and construction and operation of combined sewer overflow reduction facilities
- NPDES Wastewater Discharge Permit program, administered by the Washington State Department of Ecology
- Wastewater Collection System Consent Decree, administered by the Washington State Department of Ecology and U.S. Environmental Protection Agency

Local

- Metropolitan Functions, King County Code (KCC) Title 28, sections of which pertain to the County's functions for establishing and operating the regional wastewater treatment system.
- Utilities, SMC Title 21, Subtitle II – Sewers, administered by SPU
- Building and Construction Codes, SMC Title 22, includes plumbing code, administered by SPU
- Side sewer permit program, administered by SPU
- City of Seattle Standard Specifications for Road, Bridge, and Municipal Construction

Stormwater

Federal

- Clean Water Act, 33 USC 1251 et seq., including Section 402 – National Pollutant Discharge Elimination System
- Endangered Species Act, 16 USC 1531 et seq.

State

- National Pollutant Discharge Elimination System (NPDES) Western Washington Phase I Municipal Stormwater General Permit, administered by the Washington State Department of Ecology
- NPDES Industrial Stormwater General Permit, administered by the Washington State Department of Ecology
- Stormwater Management Manual for Western Washington, administered by the Washington State Department of Ecology
- Washington State Hydraulic Code, WAC Title 220, Chapter 660, administered by the Washington Department of Fish and Wildlife

Local

- Building and Construction Codes, SMC Title 22, Subtitle VIII – Stormwater Code, administered by SDCI and SPU
- Seattle Stormwater Manual
- City of Seattle Standard Specifications for Road, Bridge, and Municipal Construction

Electrical

Federal

- National Electrical Code, as adopted by the National Fire Protection Association

State

- 2019 Washington State Clean Energy Transformation Act, amending portions of RCW Titles 19 (Business Regulations – Miscellaneous), 43 (State Government – Executive), 80 (Public Utilities), and 82 (Excise Taxes) to commit Washington to an electricity supply free of greenhouse gas emissions by 2045.
- Washington State Energy Code, WAC Title 51, Chapters 11C and 11R

Local

- Utilities, SMC Title 21, Subtitle IV – Lighting and Power, administered by SCL
- City of Seattle Standard Specifications for Road, Bridge, and Municipal Construction

Other Potential Mitigation Measures

While each alternative has the potential to impact utilities through increased demand, none of these impacts are identified as significant adverse impacts. King County, SPU, and SCL regularly plan and adapt to changing growth patterns and are currently engaged in efforts to improve wastewater and drainage system capacity, reduce water consumption and electrical demand, and increase the resiliency of their utility systems against the impacts of climate change. City codes regulating construction and future utility investments will continue to ensure new development addresses any service or capacity constraints.

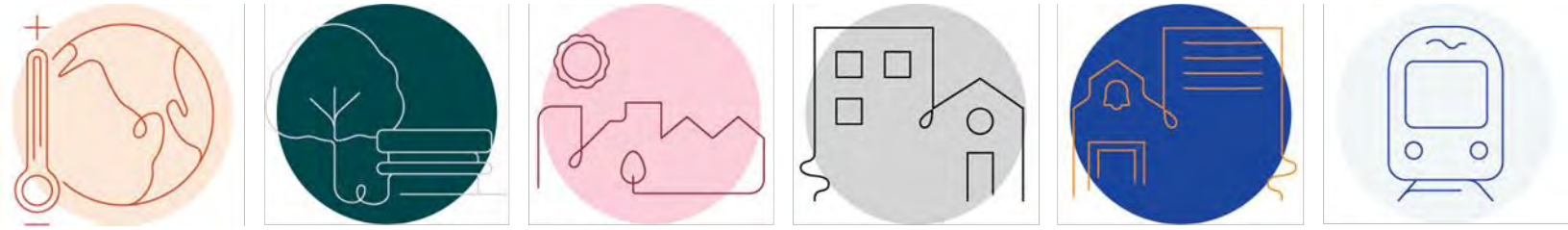
3.12.4 Significant Unavoidable Adverse Impacts

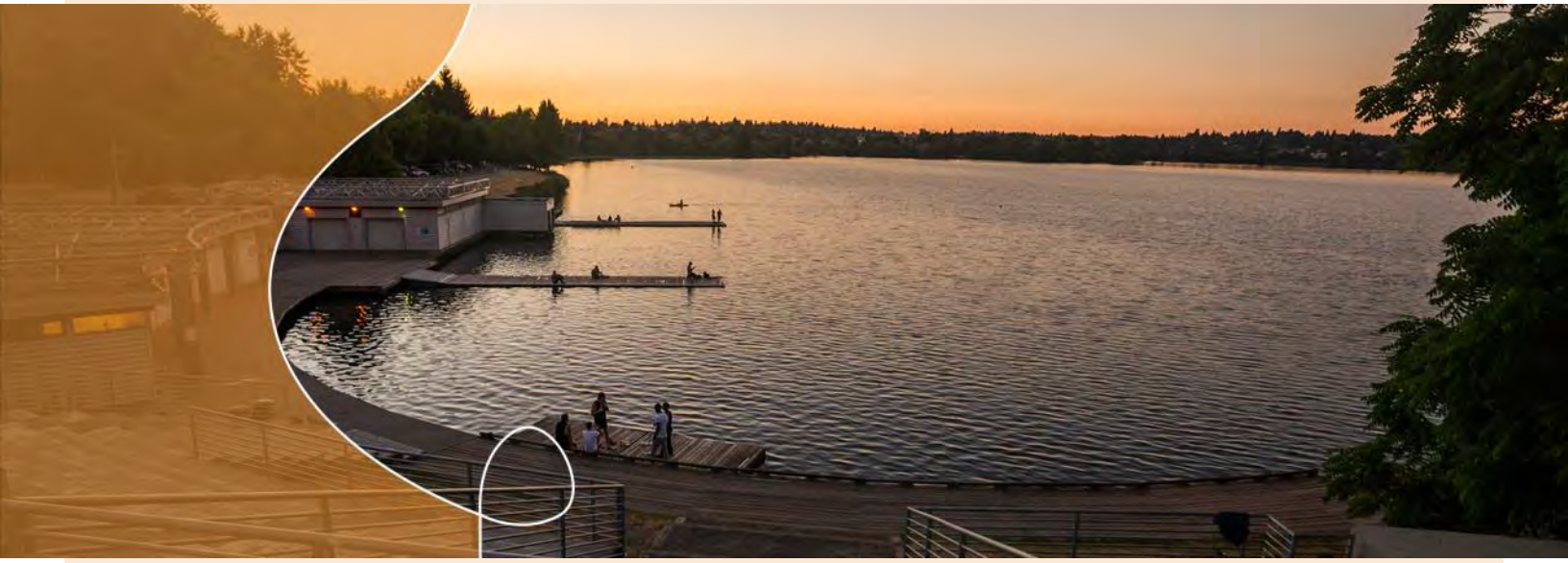
~~There would be n~~No significant unavoidable adverse impacts to utilities are anticipated under any of the alternatives as a result of the City's Comprehensive Plan update. Population and job growth under all alternatives would increase demand on the City's water, wastewater, drainage, and electrical systems and, for the action alternatives, exceed the planned growth anticipated in the utilities' planning forecasts. However, the utilities are anticipated to accommodate this growth through a combination of existing and future anticipated supply, demand management, and upgrades to existing infrastructure and facilities to improve capacity, operation, and reliability.

In areas considered capacity constrained for stormwater runoff, such as those areas with informal ditch and culvert systems, development would be subject to more stringent stormwater management requirements to avoid adversely affecting conveyance capacity and protect water quality. These requirements could require construction of formal drainage facilities to treat and manage the flow of stormwater as well.

Intentionally blank

4 RESPONSES TO COMMENTS





Source: City of Seattle, 2023.

This chapter provides responses to comments on the Draft Environmental Impact Statement (EIS). It includes the following:

- List of Commenters
- Written Comments and Responses
  - Response to Common Comment Themes
  - Comment and Responses Matrix

The marked comment letters are included in **Appendix K**.

4.1 List of Commenters

Approximately 504 written comment letters were received during the comment period March 7, 2024 to May 6, 2024. **Exhibit 4.1-1** lists the tribal, agency, interest group, businesses, and property specific commenters. Last names and agency names are listed.

Exhibit 4.1-1. List of Commenters: Tribes, Agencies, Interest Groups and Businesses, Property Specific

Number	Name	Agency
Tribes		
1	Spiry, Martin, Moses	The Snoqualmie Tribe
Agencies		
2	Representative Pollet	Representative Gerry Pollet 46th District 1
3	Representative Pollet	Representative Gerry Pollet 46th District 2
4	Hollingsworth	District 3 Seattle City Council
5	Daffern, Goldberg	Seattle Planning Commission
6	McCoy	Department of Commerce
Interest Groups and Businesses		
7	Cooke	Blue Rooster Building East LLC
8	Healey	Vulcan Real Estate
9	McCullough	McCullough Hill PLLC
10	Connell	Holland Partner Group
11	Gunter	Alexandria Real Estate Equities
12	Sanderson, Lee, Pham, Merriweather	Crescent Collaborative
13	Martin	Futurewise
14	Duvall	NAIOP Washington State
15	Boyd	Bellwether Housing
16	Bertolet	Sightline

Number	Name	Agency
17	Woo	Historic Seattle
18	Martin, Simpson	Complete Communities Coalition
19	Morris 1	Birds Connect Seattle
20	Morris 2	Birds Connect Seattle
21	McCoy	House Our Neighbors
22	Chávez	Black Home Initiative (BHI) Network
23	Johnson	Friends of Ravenna-Cowen
24	Stewart	Ballard Alliance
25	Lazerwitz	Roosevelt Neighborhood Association
26	Gurkewitz, Williams	Thornton Creek Alliance
27	McAleer 1	Laurelhurst Community Club Council
28	McAleer 2	Laurelhurst Community Club Council
29	McAleer 3	Laurelhurst Community Club Council
30	McAleer 4	Laurelhurst Community Club Council
31	McAleer 5	Laurelhurst Community Club Council
32	McAleer 6	Laurelhurst Community Club Council
33	McAleer 7	Laurelhurst Community Club Council
34	McAleer 8	Laurelhurst Community Club Council
35	McAleer 9	Laurelhurst Community Club Council
36	McAleer 10	Laurelhurst Community Club Council
37	McAleer 11	Laurelhurst Community Club Council
38	McAleer 12	Laurelhurst Community Club Council
39	McAleer 13	Laurelhurst Community Club Council
40	McAleer 14	Laurelhurst Community Club Council
41	McAleer 15	Laurelhurst Community Club Council
42	McAleer 16	Laurelhurst Community Club Council
43	McAleer 17	Laurelhurst Community Club Council
44	McAleer 18	Laurelhurst Community Club Council
Property Specific		
45	Aggerholm	Grousemont Associates, QA Canal LLC
46	Baumgartner	
47a	Boyd 1	Bellwether Housing
47b	Boyd 2	Bellwether Housing
48	Clawson	West Roy LLC
49	Clawson	Nicola Wealth

Number	Name	Agency
50	Clawson	Alteutian Spray Fisheries
51	Clawson	Lee Johnson
52	Clawson	70th & Greenwood Ave LLC 1
53	Clawson	70th & Greenwood Ave LLC 2
54	Cramer	Individual
55	Dunn	Dunn & Hobbes, LLC
56	Fiorito	Fiorito Family
57	Gunter	Alexandria Real Estate Equities, Inc. 1
58	Gunter	Alexandria Real Estate Equities, Inc. 2
59	Chhan and Enslow	Individual
60	Harel	Era Living
61	Heglund	MRH Properties LLC
62	Keck	Schnitzer West
63	Kramer	Individual
64	Lai	DCL UW LLC 1
65	Lai	DCL UW LLC 2
66	Lehmann, Gillespie, Soules, Liebman	Lander Street Owners
67	Marasco	Security Properties
68	Maxwell	Bayview Walker LLC/Prologis LP
69	McCutcheon	IPB Properties Inc.
70	McCullough	Graham Street Realty
71	Morrison	McCullough Hill PLLC
72	Norman	Individual
73	Rohlfing	Individual
74	Roos	Hillis Clark Martin & Peterson Law Offices
75	Selig	J. Selig Real Estate LLC
76	Snow	Snow & Company Inc
77	Tobar	CIM Group
78	Warner	Balboa Retail Partners
79	Wood	SBPS LLC
80	Worthington	Lock Vista Apartments LLC
81	Smith	Urban Visions 1
82	Smith	Urban Visions 2

Source: City of Seattle, 2024.

The following table lists individual commenters in alphabetical order by last name. First names are shown where there are multiple people with a common last name.

Exhibit 4.1-2. Individual Comment Letters Received

Number	Last Nam
83	Achanta
84	Akalaitis 1
85	Akalaitis 2
86	Alexander
87	Alfieri
88	Alspach
89	Amadon 1
90	Amadon 2
91	Amadon 3
92	Amadon 4
93	Anderson
94	Avron
95	Barcklow
96	Barker
97	Barrett
98	Bartanen
99	Barton
100	Baskin 1
101	Baskin 2
102	Baskin 3
103	Bassage
104	Bastian
105	Beauregard
106	Beauregard
107	Beffa
108	Bendich, Arnold
109	Bendich, Judith
110	Berg
111	Berkley, Brennen 1
112	Berkley, Brennen 2
113	Berkley, Scott 1
114	Berkley, Scott 2
115	Berliner
116	Best
117	Bhagwandin, Eva 1
118	Bhagwandin, Eva 2
119	Bhagwandin, Khai
120	Bhagwandin, Samuel
121	Bickel
122	Bicknell
123	Bledsoe 1
124	Bledsoe 2
125	BlueSpruce
126	Blumenthal
127	Bonjukian
128	Booze
129	Bos
130	Brady
131	Brandt
132	Brod
133	Broderick
134	Brooking
135	Broska
136	Bruan-Kelly 1
137	Bruan-Kelly 2
138	Brunton
139	Burrill
140	Bushue
141	Byrd
142	C, Nancy
143	Candiotti
144	Cannon
145	Cantrell
146	Carre
147	Carter
148	Catena
149	Cave
150	Chadsey
151	Chadsey
152	Charbonneau
153	Chavez
154	Chernyshev
155	Church
156	Clabough
157	Clark, Lisa 1
158	Clark, Lisa 2
159	Clark, Dave
160	Clifton
161	Close 1
162	Close 2
163	Cohen-Lewe
164	Cohen
165	Colledge
166	Cramer
167	Crocker 1
168	Crocker 2
169	Crockett
170	Cunningham Adams
171	Cushman-Macey
172	Dack
173	Dahl
174	Daniel
175	Daniels

Number	Last Nam
176	Danner
177	Davis Deborah
178	Davis Courtney
179	Devi
180	Diaz
181	Dickerson
182	Dolan 1
183	Doran 2
184	Downward
185	Du Mas, et al.
186	Duggan
187	Dunn
188	Durslag 1
189	Durslag 2
190	Dwyer
191	Edlund
192	Eldridge
193	Eliason
194	Ellison
195	Engstrom
196	Estrada
197	Exit
198	Fahrenbruch
199	Faste
200	Fayyad
201	Faz
202	Fellows
203	Fernandes
204	Fertal
205	Field
206	Filipovic
207	Foltz
208	Ford
209	Franco
210	Freidberg
211	Friedmann
212	Fristoe
213	Gadeken
214	Gaul
215	Ghiorso
216	Gillenwater 1
217	Gillenwater 2
218	Gillenwater 3
219	Gillenwater 4
220	Gingerich
221	Gloger
222	Godfrey 1
223	Godfrey 2
224	Godon
225	Grant, Andrew
226	Grant, Suzanne
227	Graves
228	Green
229	Griffin 1
230	Griffin 2
231	Griffin 3
232	Griffin 4
233	Griffin 5
234	Griffin 6
235	Griffith, Jonah
236	Griffith, Katy
237	Gross
238	Gwinn
239	Hagerty
240	Haines
241	Hammarlund 1
242	Hammarlund 2
243	Hance
244	Hannah
245	Harper
246	Havkins
247	Hedlund
248	Heerwagen
249	Hill
250	Hiltbrunner
251	Holland
252	Horn
253	Howe
254	Hranac
255	Hutchins
256	Irwin
257	Itano
258	Janzen
259	Jarvis
260	Jaureguy
261	Jeannette
262	Jeniker
263	Jerome
264	Johnson, Carla
265	Johnson, Iskra 1
266	Johnson, Iskra 2
267	Johnston
268	Jones Judi
269	Jones Mary
270	Joseph
271	K R
272	Kaldowski
273	Keefe
274	Keller, Sophia
275	Keller, Kathryn
276	Kelly, Peter
277	Kelly, Shana
278	Kerkof
279	Kidder
280	Kimball

Number	Last Nam
281	King
282	Kirchoff
283	Kirk
284	Kirschner
285	Kitchen
286	Klein
287	Knoblet
288	Kordick
289	Kramer
290	Kuczmarski
291	Lafferty
292	Lange
293	Langhans 1
294	Langhans 2
295	Lappas
296	Lavigne
297	Law
298	Lazerwitz 1
299	Lazerwitz 2
300	Lazerwitz 3
301	Lebegue
302	Leconte
303	Lee
304	Leonard
305	Leshner
306	LeVine
307	Lewis, Sarah
308	Lewis, Christine
309	Lim
310	Limberg
311	Lin
312	Little
313	Loder
314	Loeber
315	Lorey 1
316	Lorey 2
317	Lowhim 1
318	Lowhim 2
319	Ludman
320	Lukose
321	Lund
322	Luxem
323	Lyris
324	Martin
325	Mashayekh
326	Maslan
327	Mattione
328	Mauel
329	McCormick
330	McCue
331	McDonald
332	McEwuen
333	McKiernan
334	Michalski
335	Miller, Anne
336	Miller, Bonnie
337	Miller, Cameron Sidney
338	Miller-Dowell Amy
339	Mireia
340	Moehring 1
341	Moehring 2
342	Morgan 1
343	Morgan 2
344	Morgan 3
345	Morrow
346	Muir 1
347	Muir 2
348	Muller
349	Neylan
350	Nicol
351	Nims
352	Niven
353	Niznik
354	Nordstrom
355	O, Pennie
356	O'Steen
357	Obray
358	Okamoto
359	Olson
360	Olwell
361	Ortega
362	Ortiz
363	Ostrer
364	Overgaard
365	Oxman
366	Pan
367	Paul
368	Pearson
369	Pedroso
370	Pelland
371	Pellkofer
372	Penrose
373	Peterson
374	Pifer
375	Pike 1
376	Pike 2
377	Pike 3
378	Placido
379	Pope 1
380	Pope 2
381	Price
382	Quarre
383	Radmanovic
384	Rai Trapero
385	Ramsdell

Number	Last Nam
386	Rava
387	Ravell Padial
388	Ravell Mireia
389	Reuben
390	Riley
391	Robb
392	Roberts
393	Robinson
394	Rock
395	Roda
396	Root
397	Roraback
398	Rose
399	Rosentreter
400	Rubenkonig
401	Ruha
402	Russell
403	Saakian
404	Saliba
405	Sanborn
406	Sanchez
407	Sanders
408	Sanford
409	Sargent
410	Saxton
411	Scanlon
412	Scarlett 1
413	Scarlett 2
414	Scarlett 3
415	Scarlett 4
416	Scarlett 5
417	Schiefer, Estelle
418	Schiefer
419	Scholes
420	Schubert
421	Scott
422	Scully
423	Shen
424	Shettler 1
425	Shettler 2
426	Shettler 3
427	Siegelbaum
428	Siegfriedt 1
429	Siegfriedt 2
430	Sims 1
431	Sims 2
432	Skantze
433	Smith
434	Speers
435	Stephensen
436	Stevens
437	Stiffler
438	Stockwell
439	Strock
440	Stutman
441	Sundquist
442	Surdyke
443	Swing
444	Talen 1
445	Talen 2
446	Taylor, Patrick
447	Taylor Sarah
448	Tenhoff-Barton
449	Thiessen
450	Thomas, Robin
451	Thomas, Toby
452	Toms
453	Toohey
454	Travis
455	Trecha
456	Tully
457	Ullmann
458	Urban
459	Valett
460	Van Bronkhorst
461	Villasana
462	Vitz-Wong
463	VonVeh
464	Wada
465	Wade
466	Wagner 1
467	Wanger 2
468	Waldman
469	Wall
470	Ward, Galen
471	Ward, Sarah
472	Warsinske 1
473	Warsinske 2
474	Wartman
475	Weatherford
476	Webster 1
477	Webster 2
478	Weinstein, Paul
479	Weinstein Colleen
480	Weissman, Jeff
481	Weissman, Maggie
482	Weissman
483	Westgard
484	Wheeler 1
485	Wheeler 2
486	Williams, Bonnie 1
487	Williams, Bonnie 2
488	Williams, Charles
489	Williams, Pamela
490	Williams, Tony

Number	Last Nam
491	Wilmot
492	Wineman
493	Winkle
494	Wollett
495	Woo

Number	Last Nam
496	Wu
497	Young
498	Zemke 1
499	Zemke 2
500	Zemke 3

Number	Last Nam
501	Zemke 4
502	Zemke 5
503	Zubia
504	Zuluaga

Source: City of Seattle, 2024.

4.2 Written Comments & Responses

4.2.1 Response to Common Comment Themes

This section provides responses to comment themes in comments including comments regarding affordable housing, tree canopy, capacity for growth, and economic analysis. These responses are referenced in the Comments and Responses Matrix in **Section 4.2.1**.

Documents Referenced

Throughout this Chapter references are made to the following documents:

One Seattle Plan: The One Seattle Plan refers to the City's update to its Comprehensive Plan and implementing zoning and development regulations.

One Seattle Plan Comprehensive Plan Update, Draft 2024 ("Draft Plan"): This plan was issued for public comment on March 5, 2024.

One Seattle Plan Comprehensive Plan Update, Mayor's Proposed 2025 ("Proposed Plan"): This plan was issued on January 6, 2025 for consideration by City Council.

Draft EIS: The Draft EIS was issued in March 7, 2024 and evaluated proposals to accomplish the periodic update of the Comprehensive Plan. It reviewed Alternative 1 No Action and action alternatives 2 through 5. Specific references to the Draft EIS are made when necessary to identify the EIS document as it was presented on March 7, 2024.

Final EIS: Many of the responses to comments direct the reader to sections of the Final EIS since the Final EIS contains the Draft EIS together with clarifications and corrections as well as an evaluation of the Preferred Alternative. The Final EIS was issued in January 30, 2025 and evaluates a Preferred Alternative that is in the range of Draft EIS Alternatives. The Preferred Alternative includes the growth strategy in the **Mayor's Proposed One Seattle Plan** but for the purposes of this Final EIS studies a growth level of 120,000 dwelling units whereas the Plan cites 80,000 dwelling units for consistency with regional growth targets.

EIS: The term EIS by itself refers to both the Draft EIS and Final EIS.

4.2.1.1 Affordable Housing Evaluation

Letters 4 and 5 and similar

Comment theme: *Address definition of affordability. Ensure there is housing for each economic segment of the population per HB 1220.*

The EIS addresses the affordability of dwellings and potential to meet demand in **Section 3.8 Population, Housing, & Employment**.

Regarding HB 1220 evaluations, an additional sub-section was added to **Section 3.8** in the in the Final EIS. It presents a comparison of residential land capacity by income level served compared to the city's projected housing needs as detailed in King County Countywide Planning Policies. This analysis is provided for both Alternative 1, No Action, and the Preferred Alternative.

The Preferred Alternative addresses housing production barriers and actions such as zoning reform, upzones, modifications of development standards, incentives for the production of stacked flats, amendments to ADU regulations, legislation regarding congregate housing, design review reform, and permit process improvements. See also EIS mitigation measures in **Section 3.8.3**.

4.2.1.2 Tree Canopy Evaluation

Response to Comments that Appeared in Multiple Letters

Letter 83 & Similar

Comment Theme: *What are the impacts of the One Seattle Plan on Seattle's plants and animals? Questions about finding of no significant adverse impacts on plants and animals.*

> **Response:** The potential impacts of the alternatives on plants and animals are described and evaluated in **Section 3.3.3** of the Final EIS. The assessment of the potential for significant unavoidable adverse impacts on plants and animals is based on the definition of significant unavoidable adverse impacts, as described on **page 3.3-2** of the Final EIS. The key findings of the analyses of the potential impacts of the alternatives include the following:
>
> - Under all of the alternatives, the potential for adverse effects on plants and animals would be avoided, minimized, documented, or mitigated through regulatory reviews and permitting processes that apply to individual projects.
> - The action alternatives include new and amended policies to maintain and enhance tree canopy and to expand tree canopy throughout the community.

- Differences in the availability or distribution of habitats in the city limits would be unlikely to result in any appreciable impacts on populations of plants or animals in and near Seattle.
- Encouraging residential and commercial development within the urban environment of Seattle could indirectly benefit plants and animals by easing development pressure in less-developed areas outside the city. The focus of growth inside urban areas is consistent with VISION 2050 regional growth strategy for many considerations including environmental conservation.

Comment Theme: *What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?*

Response: Planting new trees to replace trees that are removed for development is a fundamental aspect of urban forest management. This approach—combined with regulations and incentives that encourage the retention of existing trees—has been used for decades by forest managers to maintain forest canopy in urban areas.

Comment Theme: *How would alternatives affect the 30% tree canopy goal?*

Response: Many factors beyond this proposal will influence canopy cover change over the next 13 years including property owner preferences, city investments, climate change, pests, tree diseases, invasive species, and forest restoration efforts. It would be overly speculative for this EIS to predict how each of the factors that are outside the change analyzed in this EIS may result in an increase or reduction in canopy cover. See Final EIS **Section 3.3.3** for a discussion of action alternative policies designed to maintain and enhance tree canopy. These policies would be expected to contribute to the City's goal of 30% tree canopy cover. Examples of policies in the Proposed Plan that would encourage progress toward the 30% goal include the following:

- Encourage the preservation and expansion of the tree canopy throughout the city... (Excerpt of policy LU 2.7)
- Monitor changes and trends in the amount, distribution, and condition of the urban forest and use this information to shape urban forestry management plans, decisions, and actions. (Policy CE 12.5)
- Preserve, restore, maintain, and enhance the urban forest across the city. (CE 12.2)
- Enhance and expand tree canopy and landscaping in the street right-of-way. (T 5.10)
- Expand tree canopy and greenspace, especially in communities that experience disproportionate impacts of extreme heat and smoke events. (CE 9.3)
- Maintain and expand cooperative agreements with … public and private agencies to provide or expand access to open spaces they control and increase the tree canopy and green space they provide. (P 1.17)

Letter 95 & Similar

Comment Theme: *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.*

> **Response:** Tree regulations do not require retention of 6" DSH trees and code changes regarding trees are not part of the proposals. See the evaluation of the Preferred Alternative in **Section 3.6.2** regarding Urban Form and Tree Canopy for the zoning standards for buildings that could improve chances at keeping tree canopy.
>
> As discussed in EIS **Section 3.3.3**, the action alternatives evaluated in the EIS include policies to maintain and enhance tree canopy, including encouraging the preservation and expansion of the tree canopy throughout the city for the aesthetic, health, and environmental benefits trees provide. In addition, action alternatives amend the Comprehensive Plan by adding climate resilience strategies that include reducing heat islands and increasing tree canopy.

Comment Theme: *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."*

> **Response:** The alternatives evaluated in this EIS do not represent a specific action at a specific time and place. Instead, they are alternative approaches to achieving the goals and policies laid out in the One Seattle Plan, which will direct future growth in certain place types as shown on the Future Land Use Map. Given the programmatic, non-project nature of the One Seattle Plan, a quantitative analysis of the alternatives' impacts on trees over the 20-year planning period would be speculative. Instead, as described in the discussion of Impacts Common to All Alternatives (**page 3.3-14**), the Final EIS evaluates each alternative's potential to contribute to reductions in tree canopy cover, based on the amount of area available for conversion to higher-density uses and the amount of area redeveloped for housing. For the Final EIS, this analysis was expanded to include an evaluation of parcel acres developed with new housing units.
>
> The assessment of the potential for significant unavoidable adverse impacts on tree canopy cover is based on the definition of significant unavoidable adverse impacts ("A substantially increased potential for tree canopy cover loss, compared to the No Action alternative"). As summarized in **Section 3.3.4** of the EIS, none of the action alternatives would be expected to have a substantially higher potential than the No Action alternative to contribute to loss of tree canopy cover for the following reasons:
>
> - The City's current tree protection regulations minimize the potential for development-related loss of tree canopy cover and require mitigation for tree canopy loss for trees 12 inches in DSH or greater, which is more mitigation than previous versions of the City's tree regulations. Further, if development occurs and the City's Tree Protection Ordinance does not require a replaced tree or fee in lieu of

replacement, the land use code may still require a tree to be planted based on the proposed development.

- The action alternatives include policies to maintain and enhance tree canopy.
- The potential for canopy loss due to factors other than development would be the same under all alternatives.

Comment Theme: *No time frame is given for any equivalent replacement of the loss of trees and urban forest ecosystem services, [nor maintenance to ensure survival].*

Response: The analyses in the EIS have been expanded to address the potential for temporal loss (i.e., time lag between the loss of functions provided by removed trees and the replacement those functions by planted trees) of the essential benefits provided by tree canopy cover.

Comment Theme: *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.*

Response: The commenter's suggestions for new policies or regulations are noted and forwarded to City decision makers. Code changes regarding trees are not part of the proposals.

The Preferred Alternative, similar to Draft EIS action alternatives, update policies regarding tree canopy. This includes an urban forest and tree canopy section of the Climate and Environment element, as well as policies in other elements to achieve a canopy coverage of 30%, to protect and expand tree canopy such as through public tree planting programs, planting trees in rights of way, and planting in areas subject to extreme heat. Also, policies address adaptive management to monitor and adapt approaches to tree canopy management. These concepts are similar to the mitigation measures in **Section 3.3.3** of the EIS.

Additionally, the Preferred Alternative's proposed zoning supports consolidated open space in the Neighborhood Residential and Lowrise zones that could provide opportunities for plantings. See also, the example Neighborhood Residential Blocks in **Exhibit 3.6-100 through Exhibit 3.6-105**. It has been updated in the Final EIS to annotate tree preservation and replacement opportunities.

Letter 500 (Friends of Seattle's Urban Forest) & Similar

Comment Theme: *Questions about the effectiveness of the Tree Protection Ordinance in maintaining tree canopy, including questions about the availability of areas where replacement trees can be planted. Recommendations for modifying the requirements of the Tree Protection Ordinance.*

> **Response:** This EIS evaluates the potential impacts of alternative approaches to achieving the goals and policies laid out in the One Seattle Plan. The action alternatives include new and amended policies to maintain and enhance tree canopy and to expand tree canopy throughout the community. Analyses in the EIS have been expanded to address the potential for temporal loss (i.e., the time lag between the loss of functions provided by removed trees and the replacement those functions by planted trees) of the essential benefits provided by tree canopy cover. Also please see the response to the question in Letter 83, above, about tree planting programs.

Comment Theme: *When will it be possible to reach the 30% citywide goal? Can the City exceed this goal?*

> **Response:** Please see the response to the question in Letter 83, above, about impacts to tree canopy coverage and 30% tree canopy goal.

Comment Theme: *What is the projected loss in canopy volume over the next 20 years as big conifer trees and others are removed?*

> **Response:** Given the programmatic, non-project nature of the One Seattle Plan, a quantitative analysis of the alternatives' impacts on trees over the 20-year planning period would be speculative. Instead, as described in the discussion of Impacts Common to All Alternatives in, the Final EIS (in **Section 3.3.2**) evaluates each alternative's potential to contribute to reductions in tree canopy cover, based on the amount of area available for conversion to higher-density uses and the amount of area redeveloped for housing. For the Final EIS, this analysis includes an evaluation of parcel acres developed with new housing units.

Comment Theme: *Can coniferous tree canopy volume removed for development be replaced in a reasonable amount of time?*

> **Response:** The analyses in the Final EIS have been expanded to address the potential for temporal loss (i.e., time lag between the loss of functions provided by removed trees and the replacement those functions by planted trees) of the essential benefits provided by tree canopy cover.

Comment Theme: *What is the projected increase in stormwater runoff? What costs are associated with on-site and alternative city water management policies of stormwater and pollutant runoff as a result?*

Response: The potential effects of the alternatives on stormwater runoff and associated policies are evaluated in **Section 3.1.3**. Potential effects relating to the management of the City's and drainage systems are addressed in **Section 3.12.3**.

4.2.1.3 Studied Growth & Revisions to Increase Capacity

This section addresses studied growth, changes to dimensional standards to increase capacity in centers, additional and/or expanded neighborhood centers, and parking minimums.

Comment Theme: *Plan for additional growth beyond the 120,000 housing units and 158,000 jobs studied under Alternative 5.*

Response: The growth target included in the Proposed Plan is 80,000 dwellings and 158,000 jobs. The Final EIS Preferred Alternative provides analysis of additional housing capacity up to 120,000 dwellings through the year 2044 in the event that the growth over the next 20 years exceeds the growth target in the Proposed Plan.

Comment Theme: *Consider changes to zoning and dimensional standards to increase capacity in centers (e.g., increased heights, remove restrictions on building lengths, revise upper-level floorplate limits and remove upper-level setbacks in regional and urban centers, remove upper-level setbacks).*

Response: The commenter's suggestions for new zoning and dimensional standards are noted and forwarded to City decision makers. Please see the description of the alternatives and code proposals in **Section 2.4**. Also see the proposed Phase 1 Legislation in **Appendix J**.

Comment Theme: *Consider adding or expanding neighborhood centers.*

Response: The commenter's suggestions are noted and forwarded to City decision makers. See the proposed neighborhood centers as part of the action alternatives including the Preferred Alternative.

Comment Theme: *Allow corner stores in more places—not just in centers.*

Response: The commenter's suggestions are noted and forwarded to City decision makers. Alternative 3 identified the concept of flexibility in urban neighborhood areas for missing middle housing as well as corner stores and at-home businesses. See **Section 2.4.3**.

Comment Theme: *Allow multifamily housing close to all of our major parks. Ensure green space and open space for housing; do not turn parks into housing.*

Response: With action alternatives, the City is adding capacity for new housing across the city including in mixed use centers and in low density residential areas with middle housing that could increase density near parks. See **Section 3.11 Public Services**

regarding demand for parks under each alternative. The 2024 Parks and Open Space (POS) Plan also identifies a long-term acquisition strategy for natural areas, and parks in a 5-minute walk in urban centers and areas outside urban centers with a 10-minute walk (see EIS **Exhibit 3.11-26**).

Comment Theme: *Eliminate parking minimums, citywide or in certain centers, to support more TOD development in Seattle.*

Response: The commenter's suggestions for parking standards are noted and forwarded to City decision makers. The EIS addresses concepts for amended codes including reducing or eliminating residential parking minimums citywide. See **Section 1.4.9** and **Section 2.4**. Parking and urban form are topics in **Section 3.6**. While eliminating parking minimums may be pursued by the City, the Final EIS does not include an analysis of its effects in **Section 3.10 Transportation** because it is not a specific proposal of the Preferred Alternative nor must amendments to remove parking from development be analyzed under SEPA. See RCW 43.21c.450.

As part of the Preferred Alternative and associated Phase 1 legislation the City is addressing parking reform per SB 6015 for residential development. See **Appendix J**.

4.2.1.4 Economic or Market Analysis

Comment Theme*: Request for economic feasibility, cost-estimates, or market analysis.*

Response: SEPA does not require cost-benefit or economic analysis (WAC 197-11-448 and 450). Economic feasibility of development is affected by many factors, including unpredictable and frequently changing market conditions. The time horizon of the EIS is over 20 years, and factors that affect the short-term feasibility of development are likely to change over the study period.

4.2.2 Comment and Responses Matrix

Marked comment letters are included in **Appendix K**. In the matrix below, comments are summarized and responses are provided for each comment. Comments that state preferences on alternatives or other matters are acknowledged with a response that the comment is noted and forwarded to City decision makers. Comments that address methods, analysis results, mitigation, or other matters are provided a response.

The remaining sections are organized to group comments as follows:

- Tribes
- Agencies
- Interest Groups and Businesses
- Property Specific
- Individuals

4.2.2.1 Tribes

Exhibit 4.2-1. Written Comments and Responses, 2024—Tribes

Number	Comment Summary	Response
1	Spiry, Martin, Moses	The Snoqualmie Tribe
1-1	The Study Area should be expanded to include waters and lands affected by City Utilities and city owned properties outside of City limits.	The Comprehensive Plan applies to the Seattle city limits and is intended to address Growth Management Act requirements for a periodic update. The City plans for its public facilities serving planned growth through the Capital Facilities Plan. Capital facilities outside the city limits are subject to Seattle system plans and the land use, critical areas, and additional development regulations of other local government agencies who likewise must address public facilities in their Comprehensive Plans. When the City adopts system plans for utilities, it would be subject to SEPA review unless exempt. The facilities must also meet state and federal requirements. The City's Comprehensive Plan and other local government Comprehensive Plans attain consistency by following PSRC Multicounty Planning Policies and King County Countywide Planning Policies.
1-2	Lacks analysis of policies regarding tree canopy. Analyze effects of its interpretation of "equity" regarding tree canopy.	Please see EIS **Section 3.3.2** (Impacts—Plants and Animals) for analyses of the potential for the alternatives to result in tree canopy loss that would contribute to adverse effects on disadvantaged populations.
1-3	General comment about the history of the City of Seattle.	Comments are noted. Please see edits to the Cultural Resources text to include the Snoqualmie Tribe's clarifications to the context of Seattle's history in **Section 3.9.2**.

4.2.2.2 Agencies

Exhibit 4.2-2. Written Comments and Responses, 2024—Agencies

Number	Comment Summary	Response
2	Representative Pollet	Representative Gerry Pollet 46th District
2-1	Request to partner to update the housing provisions to fully realize collective bold vision that encourages the development of dense and vibrant communities.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers
2-2	The Plan fails to provide any plan to meet needs for housing units for households at every economic/income level, or prevent displacement in identified areas. The plan does not increase the level of growth in housing units	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

Number	Comment Summary	Response
	that is adequate. Increase number of neighborhood centers,	
2-3	Missing opportunity to develop a plan to attract and retain families with school age children, essential workers in healthcare, education, other public services, hospitality, etc. Several strategies listed including HALA program, tax increment financing, Multi Family Tax Exemption etc.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
2-4	The Plan fails to address new statutory requirements for consideration of climate change and environmental justice including backsliding on goal to have 30% tree canopy by 2037.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. The EIS includes climate and equity metrics and each chapter addresses these metrics. The City completed a Climate Vulnerability Assessment (2023) per a grant. The City has developed a Draft Climate and Environment Element. Still, the City may do more to meet HB 1181 and has until 2029 to fully address requirements. The City adopted new tree canopy regulations in 2023 meant to further address tree retention and mitigation, and the Final EIS includes a review of developable land and tree canopy while providing Neighborhood Residential typologies that indicate how new units could be designed to avoid impacts to trees.
2-5	The urban center at NE 130th St should have additional planning with additional density along Roosevelt Way NE.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
2-6	The plan fails to reflect requirements of HB 1220 and ensure there is housing for each economic segment of the population. Another 11,570 units affordable for households earning 50-80% AMI should be in the Plan's goals.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See Draft Housing Appendix and Supplemental Tables, available at the project website: https://www.seattle.gov/opcd/one-seattle-plan.
2-7	Tree preservation and other environmental elements are not adequately addressed. Required mitigation measures to achieve policies are not addressed or proposed. How will the City "encourage" protection, maintenance, and expansion of tree canopy? Many suggestions and questions such as; if increasing	Comments are noted. **Section 3.3.3** of the Final EIS describes how the existing tree ordinance (recently adopted in 2023 and upheld by the Washington Growth Management Hearings Board) encourages protection, maintenance, and expansion of tree canopy, and that the action alternatives include policies designed to maintain and enhance tree canopy in the city. The No Action and Preferred alternatives were evaluated in light of the 2023 tree protection code. The Final EIS illustrates how Neighborhood Residential code parameters, design choices, and parking can impact space for

Number	Comment Summary	Response
	height and housing units near parks, address how increasing height and development FAR will impact natural habitat within park boundaries.	trees in middle housing type developments (**Exhibit 3.6-106**). Several of these examples include adequate space for preserved trees while meeting housing goals. In addition, Neighborhood Residential developments will be required to include 20% shared open space, which must be at least 10' by 10', providing some space for preserving or planting small trees. Comments are noted on the development standard mitigation suggestions. Potential mitigation measures for tree canopy, noted in the Final EIS in **Section 3.3.3**, include requirements for tree planting with redevelopment in Neighborhood Residential zones, a focus on funding for trees, especially in public rights-of-way and parks, height incentive for providing ground floor open space, and promotion of narrower building footprints. Further tree canopy policies, regulations, and potential mitigation measures are included in the Plants & Animals chapter **pages 3.3-31 through 3.3-36**. The Preferred Alternative proposes updated policies to protect and enhance tree canopy. The Preferred Alternative also proposes development regulations that improve chances of increasing tree canopy per **Section 4.2.1.2**. Please also see revisions to **Section 3.3.2** that describe the potential for new growth to be developed adjacent to parks and minimization of impacts due to location of streets, zoning based height limits, and tree retention regulations.
3	**Representative Pollet**	**Representative Gerry Pollet 46th District**
3-1	Urge adoption of increased goal for housing units and meet requirements of HB 1220.	See response to Comment 2-6.
3-2	There are no meaningful discussion, new proposals or consideration in the Plan of appropriate policies to prevent displacement in identified areas with high displacement potential.	See response to Comment 2-3.
3-3	The Plan and EIS fails to address new statutory requirements for consideration of climate change and environmental justice, including backsliding on adopted goal to have 30% tree canopy by 2037.	See response to Comment 2-4.
4	**Hollingsworth**	**District 3 Seattle City Council**
4-1	Concern that the baseline and all alternatives plan for addition of 158,000 jobs suggest that varying number of people must live outside the city and commute in for work. For transportation; include analysis of each alternative the transportation impacts that are caused by imbalance between	The EIS analysis uses the PSRC regional travel demand model to estimate the travel patterns that would result from each land use alternative. The model includes the entire PSRC four-county region (King, Kitsap, Snohomish, and Pierce) and captures commute trip behavior beyond city limits. Therefore, the transportation analysis provided in the EIS reflects the travel behavior variations that would result from the jobs-housing balance assumed with each alternative.

Number	Comment Summary	Response
	projected new jobs vs. projected number of new housing units.	
4-2	Account for the changes to GHG emissions that result from imbalance between housing increases and job increases in each of the alternatives.	GHG emissions analysis of the county and region are addressed through VISION 2050 adopted by the Puget Sound Regional Council (PSRC). The City is planning for growth consistent with the regional growth strategy. The EIS analysis of GHG emissions for each alternative includes transportation emissions. The GHG analysis uses the vehicle miles traveled (VMT) data provided by the transportation analysis. As stated above in response to Comment 4-1, the transportation analysis provided in the EIS and used in the GHG analysis reflects the travel behavior variations that would result from the jobs-housing balance assumed with each alternative.
4-3	Analyze effects of habitat loss, aquatic environmental health, and tree canopy outside city limits.	VISION 2050 and its SEIS provides an evaluation of regional growth and a unified growth strategy and multicounty planning policies to reduce impacts. Each jurisdiction is undergoing their own review of their respective Comprehensive Plans, and impacts of meeting their growth targets. Each community completes its own evaluation of growth and must protect critical areas. With requirements of HB 1181 jurisdictions in the four-county area with develop tree canopy evaluations by 2029. Even though the City was allocated 80,000 new units consistent with VISION 2050 and Countywide Planning Policies, the City considered growth up to 120,000 dwelling units to consider additional housing supply and affordability options in the city which could have the effect of a smaller growth in rural areas as noted on Final EIS **page 3.1-22**. The City is analyzing environmental impacts of various alternatives to implement the One Seattle Plan. The One Seattle Plan does not propose any land use changes outside the City of Seattle with the limited exception of identification of possible annexation areas. The EIS analyzes likely environmental impacts of the proposed alternatives within the city limits.
4-4	Analyze how each alternatives changes the supply of housing suitable for households with children, and supply of housing for middle-income households.	Please see **Section 4.2.1.1** regarding the **Affordable Housing Evaluation** under HB 1220. Please also see **Section 3.8** of the EIS which addresses the affordability and variety of housing types under each alternative.
4-5	Ensure 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 2024.	The Final EIS compares a range of growth alternatives to identify any adverse environmental impacts and associated mitigation strategies. None of the alternatives analyzed preclude bringing nonconforming structures into conforming status.
4-6	Ensure the final EIS does not preclude future changes to the Comp Plan that could be used to incentivize the construction of	The Final EIS compares a range of growth alternatives to identify any adverse environmental impacts and associated mitigation strategies. None of the alternatives precludes incentivizing

Number	Comment Summary	Response
	multifamily structures as alternatives to townhomes.	construction of multifamily structures as an alternative to town homes.
5	**Daffern, Goldberg**	**Seattle Planning Commission**
5-1	Highlight aspects that are appreciated including, inclusion of detailed historical context of housing, racial equity, historical harms, exploration around concept of displacement.	Comments noted regarding the Seattle Planning Commission's appreciation for the historic context equity and displacement.
5-2	Overall recommendations including more detailed explanation for how the areas and place types are defined and selected, complete exploration of racial disparities, include Seattle's emergency preparedness and response for earthquakes, Separate 130th/145th street station area, study Planning Commission's recommendation.	**Place Types:** Please see **Section 4.2.1.1** regarding the **Affordable Housing Evaluation** under HB 1220. Please also see **Section 3.8** of the EIS which addresses the affordability and variety of housing types under each alternative. **Racial Disparity:** The Final EIS considers Equity and Climate Change Performance Metrics, June 2022. The metrics address various aspects of overburdened communities, income, race, and other. The City's Race and Social Equity Index is referenced in Transportation and Public Services evaluations. State Department of Health disparities incorporate similar socioeconomic and race information and are considered in Earth & Water Quality and Air Quality & GHG, **Emergency Preparedness, Earthquakes:** Regarding fire and emergency services see Final EIS **Section 3.11**. Building codes and Emergency Response Plans address seismic hazards, and are proposed to be included in Earth & Water Quality mitigation measures. See Final EIS **Section 3.1.3**. **130th/145th Street Station Area Evaluation:** The EIS addresses citywide and station area conditions and potential impacts. Separate subsections call out the impacts. No change is proposed in the Final EIS. **Study Planning Commission Recommendations:** Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
5-3	Air quality and GHG emission suggestions: study impacts of locating sensitive uses near additional high-volume traffic roadways beyond the freeways.	**Section 3.2 Air Quality** discusses the exposure of air borne toxics along major roadways. **Exhibit 3.2-6** shows a 1,000-foot buffer around roadways and highways with daily trips greater than 100,000 vehicles within the City of Seattle. **Exhibit 3.2-9, Exhibit 3.2-11, Exhibit 3.2-13, Exhibit 3.2-15**, and **Exhibit 3.2-17** highlight the land uses within the 1,000-foot buffer under each of the Alternatives accompanied by discussion of residential units within affected areas. The EIS Air Quality & GHG evaluation references the **Exhibit 3.1-12** Environmental Health Disparities in **Section 3.1 Earth & Water Quality**. It identifies the neighborhoods most affected by health disparities. The combination of the air borne toxics analysis with high volume roads and reference to the state index

Number	Comment Summary	Response
		addresses the city as a whole. Therefore, no further study is required.
5-4	Land Use Patterns and Urban Form suggestions include more detail and context on negative land use impacts and consequences of those impacts, emphasize negative impacts resulting from urban growth are expected and only temporary, highlight both positive and negative equity impacts.	As noted, the "negative" land use impacts of urban growth are expected and temporary, and thus, did not warrant additional analysis beyond disclosing the potential changes in the EIS. Many of these are also considered positive impacts (e.g., greater mixing of uses). Additional analysis for urban form impacts from allowances for middle housing are under **Appendix G.2** Updating Seattle's Neighborhood Residential zones. The comment to emphasize that no significant unavoidable adverse impacts to land use patterns, compatibility, or urban form are expected under any of the alternatives is noted. The comment to highlight the positive and negative equity impacts, as described in the Equity and Climate Vulnerability sections, is noted. Climate Resilience Opportunities are included in the Seattle Climate Vulnerability Assessment, July 2023, and the City has developed a Climate and Environment Element with policies addressing sea level rise. The City has also recently developed flood regulations updates addressing sea level rise. These are added as mitigation measures in **Section 3.1.3**.
5-5	Population, Housing, and Employment suggestions: provide additional employment analysis related to changing nature of work location post pandemic, study impacts of anti-displacement policies beyond MHA, study housing affordability and supply more deeply, add discussion of housing choice in areas of high opportunity.	**Employment:** The alternatives consider employment growth targets from VISION 2050 and Countywide Planning Policies. Action alternatives account for a redirection employment that are associated with changing nature of work and home; about 15% of new jobs in each action Alternative are assumed to be located in proportion to the location of new housing. (See for example Pages 2-2 to 2-4 and the tables identifying job assumptions for each alternative in Sections 2.4.2 to 2.4.5.) This assumption would account for the desire of many businesses such as local retail, eating places, and services, to locate near housing. **Anti-displacement:** MHA and MFTE are the two affordable housing policies in Seattle that are directly tied to new development activity. This is because the amount and location of new affordable housing generated through these programs is dependent on the amount and location of new multifamily housing development. Therefore, these are the only anti-displacement policies that are expected to be impacted by the alternatives. **Section 3.8.3** identifies other anti-displacement measures that are included in all alternatives, as well as other potential mitigation measures that the city could pursue. **Affordability and Supply:** As described above, MHA and MFTE are the only programs for supporting affordable housing production that are expected to be impacted by the action alternatives. Therefore, the comparison of affordable housing supply impacts focuses on impacts to these programs. **Section 3.8.3** identifies other affordable housing measures that are included in all alternatives, as well as other potential mitigation measures that the city could pursue. **Housing Choices in High Opportunity Areas:** See Response to Comment 5-2.

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5-6	Transportation suggestions include adding relationship between transportation analysis for Draft EIS and Seattle Transportation Plan, more information on significant unavoidable adverse impact to transit capacity, and accessible language should be used to present results of the impact analysis.	The EIS includes a summary of existing conditions for reference, but all impact analysis is based on analysis using the 2044 proposed land use alternatives. The commenter requests more information on whether the EIS mitigation measures are consistent with those proposed in the STP. Targeted transportation capacity improvements—see Appendix A Large Capital Project Summary Sheets of the STP which include potential multimodal improvements to N 130th Street, NE 145th Street, 15th Avenue NE, and Aurora Avenue N (note SDOT may choose not to pursue general purpose vehicle capacity increases). Bicycle, pedestrian, and freight connections: see Bicycle and E-Mobility Element, Pedestrian Element, and Freight and Urban Goods Movement Element in STP Part 2. Demand management using policies, programs, and investments aimed at shifting travel to modes other than single occupant vehicles – see Climate Action Key Move in STP Part 1. The commenter requests information on the potential magnitude of the transit capacity impact. This information is presented in **Section 3.10.2** of the Final EIS with maximum passenger load factors (the ratio of passengers to crowd thresholds for bus or light rail) for each alternative. The Final EIS has been updated to include a more reader-friendly explanation of the analysis.
6	**McCoy**	**Department of Commerce**
6-1	Land use element suggestions: include population projections as required by GMA, and provide draft of all associated development regulations and zoning updates in order to be reviewed for consistency with GMA.	The comment is noted. The Proposed Plan includes information on the housing growth target and jobs growth target that were adopted by the Growth Management Planning Council for the City of Seattle in the Land Use Element. Estimates reported in the EIS use an assumed persons per household (pph) to convert Seattle's housing growth target to population.
6-2	Housing element suggestions: include a policy on a variety of moderate density housing types, provide supporting documentation indicating sufficient land capacity for emergency housing and shelter, strategies identified in the "Actions to Address Barriers" do not appear to clearly address barriers to housing across all income levels, include a review of housing element policies that led to racially disparate impacts in the Housing Appendix.	**Section 3.1** of the Final EIS provides an analysis of the potential impacts to Earth and Water Quality. **Section 3.1.2** analyzes the potential impacts associated with each alternative and finds that there are no significant unavoidable adverse impacts. **Section 3.3** of the Final EIS provides an analysis of the potential impacts to plants and animals, including tree canopy. **Section 3.3.2** analyzes the potential impacts associated with each alternative and finds that there would be no significant, unavoidable adverse impacts on tree canopy.
6-3	Transportation element suggestions include adding a transition plan for transportation per Title II of the ADA, add detailed description of each demand management strategy, detailed	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

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	discussion of how additional funds will be raised and how land use assumptions will be reassessed, expand discussion on compatible airport siting.	
6-4	Capital facilities element suggestions include adding an inventory of existing capital facilities, forecast of future needs, capacities of expanded or new capital facilities, and a policy or procedure to reassess directly in the capital facilities element.	Comment noted. See the Proposed Plan, Capital Facility Element. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
6-5	Utilities element suggestion include an inventory of existing utilities consisting of location, proposed location, and capacity of existing and proposed utilities.	Comment noted. See the Proposed Plan, Utilities Element. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

4.2.2.3 Interest Groups/Businesses

Exhibit 4.2-3. Written Comments and Responses, 2024—Interest Group/Businesses

Number	Comment Summary	Response
7	**Cooke**	**Blue Rooster Building East LLC**
7-1	The Plan does not go far enough to address the current housing deficit and future demand. Reconsider the 20 year incremental planning horizon when strategizing for growth.	The 20-year planning period is based on the Growth Management Act requirements. RCW 36.70A.110. The City has examined alternatives that address the growth target assigned (Alternative 1, No Action) as well as growth beyond that (20,000-40,000 units in Alternatives 2 to 5 and the Preferred Alternative in this Final EIS).
7-2	Expand the Fremont Hub Urban Village Boundaries to incorporate underutilized or undeveloped properties. Support for Alternative 4 and 5.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
8	**Healey**	**Vulcan Real Estate**
8-1	The City can go even further to support steady housing and job growth over the next two decades.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
8-2	Provide further analysis of Sound Transit's Plans and articulate the City's preferred direction in order to maintain South Lake Union as a thriving jobs center.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

Number	Comment Summary	Response
8-3	Identify a higher level of job growth to ensure a thriving economy.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. All alternatives can meet employment growth targets. The plan is updated every 10 years and can be adjusted as needed if job growth changes.
8-4	Take a bolder, clearer approach to zoning changes in regional centers and urban centers, while recognizing the benefits of neighborhood centers.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
8-5	Identifies strategies to reduce costs and restore regulatory certainty including reforms in permitting processes and regulatory programs.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. Please see **Appendix C** regarding infill exemptions that are meant to facilitate permitting of housing. The City may alternatively modify SEPA thresholds under WAC 197-11-800(1)(d).
9	**McCullough**	**McCullough Hill PLLC**
9-1	Set of 10 proposed text amendment to residential uses in existing buildings in II zones.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
10	**Connell**	**Holland Partner Group**
10-1	Support Draft EIS 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 Final EIS should also include more information about the likely increases in density in the regional centers and urban centers. Additional growth potential should be identified for regional and urban centers, and make baseline changes (including building height, building lengths, Floorplates, and setbacks) ahead of any future subarea planning work.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. Later in 2025, OPCD will begin studying potential increases in density in urban centers and regional centers. See also **Section 4.2.1.3** regarding studied growth and changes to dimensional standards to increase capacity in centers.
10-2	Support the neighborhood center concept, but suggest a few adjustments including additional	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes

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	neighborhood centers, expand radius, and increase height limits.	related to the One Seattle Plan will be forwarded to decision makers. See also **Section 4.2.1.3** regarding changes to dimensional standards to increase capacity in centers and additional and/or expanded neighborhood centers.
10-3	The Draft EIS 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. Articulate a plan for supporting job growth and commercial development if the City's planning efforts are to be truly competitive.	All alternatives can meet employment growth targets. The plan is updated every 10 years and can be adjusted as needed if job growth changes.
10-4	Eliminate parking minimums to support the development of a more transit-oriented city.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also **Section 4.2.1.3** regarding elimination of parking minimums.
11	**Gunter**	**Alexandria Real Estate Equities**
11-1	Prioritize and incentivize life sciences investment. Example suggestions for Final Plan and EIS included studying development standards to accommodate needs of life sciences industry such as allowances for additional rooftop mechanical equipment, electrical system redundancy and flexibility in energy code requirements.	Prioritization or incentivizing life sciences beyond what the Comprehensive Plan and current development regulations allow is a policy decision and outside the scope of the EIS. The comments are noted and forwarded to City decision makers. The EIS studies employment growth in the city. The Proposed Plan refers to life sciences in its Economic Development Element. The current and proposed plan allow for life sciences.
11-2	Include more detailed analysis of impacts under a range of different scenarios for employment and the economy, and articulate bold life sciences economic development strategy.	All alternatives can meet employment growth targets. The plan is updated every 10 years and can be adjusted as needed if job growth changes. See Response to Comment 11-1 too.
11-3	Support Life sciences by providing greater clarity in its approach to additional density in regional centers and urban centers.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
12	**Sanderson, Lee, Pham, Merriweather**	**Crescent Collaborative**
12-1	Replace the Draft Plan growth strategy with Alternative 5.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes

Number	Comment Summary	Response
		related to the One Seattle Plan will be forwarded to decision makers.
12-2	Build more family sized housing, and identify and mitigate current zoning regulations with discriminatory effects and racially disparate impacts.	The comments are noted and forwarded to City decision makers. The Proposed Plan and Final EIS considers a household size consistent with regional evaluations per response to Comment 6-1. The Alternatives consider different Place Types allowing for a range of housing of different sizes to accommodate different household sizes. The Alternatives consider different levels of housing units in the future that could address the different future populations in the city.
12-3	Add to and expand anti-displacement strategies in collaboration with impacted communities. 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.	The comments are noted and forwarded to City decision makers. As part of HB 1220 requirements the City must provide capacity for housing at different income levels and housing types. The updated Housing Element and codes are to address removal of barriers to housing including ensuring anti-displacement measures. See the City's draft anti-displacement framework and appendix. This evaluation is updated with the Proposed Plan. See **Section 4.2.1.1 Affordable Housing Evaluation**.
13	**Martin**	**Futurewise**
13-1	Ensure adequate public services and facilities for Seattle's growth targets.	The City's current plans and code are still in place and address the horizon to the year 2035. There is not a gap in services or facilities standards. City regulations addressing services and facilities are in place such as those identified in **Appendix C** for infill development. Refer to Final EIS **Section 3.11** regarding impacts to public services of the Preferred Alternative. See the City's One Seattle Capital Facilities Appendix and Utilities Appendix for discussion of future growth,
13-2	Adopt a goal-oriented approach for converting housing units to population and take steps to mitigate current zoning regulations with discriminatory effects and/or racially disparate impacts.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See Responses to Letter 12.
13-3	Quantify the relationship between zoning and racial demographics for current and proposed growth strategies.	The comments are noted and forwarded to City decision makers. The City has addressed HB 1220 requirements in its Draft Housing Element and Draft Housing Appendix. See also the response to Comment 12-3.
13-4	Plan for substantially more housing production in low-displacement risk areas to address racial disparities.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. The City has developed an analysis of racially disparate impacts in its Draft Housing Element and Draft Housing Appendix. Equity

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		in relation to parks is addressed in the City's PROS Plan and also described on EIS in **Section 3.11**.
13-5	Increase the ability of all residents to live in the neighborhood of their choice by expanding missing middle affordable housing incentive program and ensure distribution of new neighborhood centers.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
13-6	Plan for centers near new light rail stations and regional centers in South Seattle and West Seattle.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
13-7	Support for Alternative 5.	The preference for Alternative 5 is noted. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
13-8	Prioritize carbon-neutral transportation modes.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
13-9	Revise the regulatory barrier analysis to follow Department of Commerce guidance by including review of specific barriers to a variety of household size for those affordability levels.	The comments are noted and forwarded to City decision makers. The City has addressed HB 1220 requirements in its Proposed Plan Housing Element and Housing Appendix. See **Section 4.2.1.1 Affordable Housing Evaluation**.
13-10	A list of housing related changes; summarize development capacity by projected housing need category for the Final EIS Preferred Alternative, increase FAR maximum, expand mandatory housing affordability program, add to and expand anti-displacement strategies in collaboration with impacted communities.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
14	**Duvall**	**NAIOP Washington State**
14-1	Support Alternative 5, including added development capacity in the "new place types," and identified areas where the City could go farther to achieve the city's goals: Regional Centers, Corridors, Neighborhoods, Citywide Bonuses, Mass Timber Bonus, and Housing	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. Regarding options for non-industrial uses in the MIC, please see the Final EIS for the Seattle Industrial and Maritime Strategy September 2022.

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	in the MIC on Catalyst Sites and No MHA.	
14-2	Suggest flexible street level uses and interim MHA fee exemption for the downtown revitalization efforts.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
14-3	Identify level of economic growth necessary for a successful economy and plan for that. Concern that there lacks a specific economic development strategy.	See response to Comment 8-3.
14-4	Land use entitlements for development City-wider should be simplified and shortened.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
14-5	Decline any proposal to raise MHA fees in the short term, and any other types of impact fees, including transportation impact fees.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
15	**Boyd**	**Bellwether Housing**
15-1	Move forward with the completion and implementation of the Downtown Subarea Plan. Study and support plans for additional height and density allowances throughout Seattle. Alternative should be studied that creates a better balance between new jobs and new housing units in downtown.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. Please also note that Seattle is considered a Core City under the PSRC VISION 2050 per **Section 3.7 Relationship to Plans, Policies, & Regulations** and Downtown serves as a regional jobs hub.
16	**Bertolet**	**Sightline**
16-1	Get the zoning details right for middle housing to ensure that its feasible to build and can provide family-size and accessible homes. 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. Eliminate requirements for off-street parking citywide. See attached article.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also Response to Comment 7-1.

Number	Comment Summary	Response
17	**Woo**	**Historic Seattle**
17-1	Correction on the NRHP and WHR Listed Architectural Districts and Properties the Nuclear Reactor Building at UW was listed in the National Register but it was demolished by UW in 2016.	Per Historic Seattle's comment the Final EIS is edited for clarity. See **Section 3.9.1, Exhibit 3.9-13**.
17-2	More information about modifying demolition review process so that historic review occurs even if SEPA thresholds are increased.	In **Section 3.9 Cultural Resources** one example of a possible mitigation measure the City could implement is to modify the demolition review process to include historic reviews for properties that do not meet the review criteria, even if the SEPA thresholds were increased. Broadening the use of historic reviews might help to catch properties that have historical significance but that could be missed without such a review.
18	**Martin, Simpson**	**Complete Communities Coalition**
18-1	Concerns that the policies are too similar to the City's current policies to create significant change. Recommend Final EIS designate a "preferred alternative" based on the OPCD Draft Plan and modified version of Alternative 5. The Final EIS should include a table that summarizes zoned land development capacity analysis and projected housing needs for the Preferred Alternative.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. The City is required to identify the capacity to meet housing targets by affordability band in its Housing Element. See **Section 4.2.1.1 Affordable Housing Evaluation**.
18-2	Expand potential for growth in urban and regional centers by increasing the area they cover and the intensity of development allowed. List of specific regional growth centers and urban centers to include, expand, and study in Final EIS.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. Overall growth by area and centers types are included in the Final EIS similar to the Draft EIS.
18-3	Support for neighborhood centers with a list of requests including a list of additional neighborhood centers to include, expand the radii to ¼ mile to support a small cluster of mixed-use development, increase FAR, height limits to 85 feet, and study potential adverse environmental impacts.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also **Section 4.2.1.3** regarding changes to dimensional standards to in centers and additional and/or expanded neighborhood centers.
18-4	Support for increased "Corridor" growth strategy by allowing midrise housing up to 85 feet in height, add the corridor place type to policies that reference the three	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes

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	centers, impose a maximum FAR no lower than 2.0 multifamily development, and allow mixed use residential development.	related to the One Seattle Plan will be forwarded to decision makers.
18-5	In regard to Urban Neighborhoods and middle housing, a list of suggested recommendations including but not limited to increasing allowed FAR for middle housing, create 0.2 FAR bonus for stacked flats, 0.1 FAR bonus for each MFTE, allow subdivision of lots into lots less than 1,000 square feet etc.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
18-6	In regard to Affordable Housing and Social Housing, a list of recommendations including but not limited to revising the proposed affordable housing bonus to ensure it is usable by broad range of developers, increase the propped lot coverage from 60-70%. Allow proposed affordable housing bonus to be used outside of frequent transit, etc.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
18-7	A list of recommendations to go beyond current equitable development and anti-displacement strategies and programs with specific tools and policies.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
18-8	Multifamily Housing mapping errors, if not corrected would likely result in a loss of existing zoned housing capacity and a reduction in the fifteen-minute walkable neighborhoods.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
18-9	Support for Goal TG1 and recommendation to prioritize proximity-based strategies over mobility-based ones, and a list of transportation recommendations.	The commenter requests a study of the environmental impacts of revising the City's parking requirement policies. See **Section 4.2.1.3 Studied Growth & Revisions to Increase Capacity**.
18-10	Additional specific climate goals that prioritize transportation mode shift toward active mobility options, and building de-carbonization.	The commenter encourages the City to set additional specific climate goals that will allow for progress to be accurately assessed on an ongoing basis. **Section 3.2 Air Quality** discusses current regulations and commitments including ongoing Building Tune-Ups to achieve energy and water efficiency, elimination of fossil fuels from water heating and space heating in new construction consistent with City of Seattle Building Energy Code,

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		the tracking and reporting of energy performance pursuant to the City of Seattle Building Energy Code, and commitment to Seattle's Transportation Electrification Blueprint. The City's commitment to ongoing regulations would allow for ongoing assessment and continued progress toward emissions reduction goals. The commenter requests additional discussion of Alternative 1's impact conclusion of no significant adverse impact. The commenter points out that Alternative 1 would result in increased VMT. However as shown in **Exhibit 3.2-7**, Alternative 1 would result in the lowest increase in VMT and least amount of VMT-related GHG emissions when compared to Alternatives 2 through 5. As discussed in **Section 3.2 Air Quality**, all five alternatives would result in lower GHG emissions on a per capita basis compared to existing conditions and alternatives would not prevent or deter statewide, regional, or local efforts to reduce GHG emissions. Therefore, the finding of no significant adverse impact for Alternative 1 is accurate. Further, the commenter notes that they agree with the statement that "while each 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."
19	**Morris**	**Birds Connect Seattle 1**
19-1	Identified potentially development threatened tree canopy in environmental justice priority areas. Estimate 207-217 acres of development threatened tree canopy on private priority.	Comment noted. This comment is beyond the scope of environmental review of the One Seattle Plan, so no response is necessary. See Letter 20. This comment submittal is a repeat of Exhibit A, which is attached to Letter 20.
20	**Morris**	**Birds Connect Seattle 2**
20-1	List of high-level summary of comments and recommendations to strengthen the draft focused on climate mitigation, adaptation, resilience, green jobs and sustainable economy, and tree canopy.	Comment noted. This comment is beyond the scope of environmental review of the One Seattle Plan, so no response is necessary; please see responses to specific comments below.
20-2	Recommendation to revise the climate and sustainability element to be the climate, biodiversity, and sustainability element with track change examples.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
20-3	Recommendation to increase ambition and specificity of goals and policies related to urban biodiversity by revising policies in the Land Use element,	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

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20-4	Adding policies and recommended language changes to the Transportation Element, Economic Development Element, Climate and Environment Element, Parks and Open Space Element,	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
20-5	Expand conception and expectations of sustainable buildings and City operations to include wildlife safety through changes to the Land Use element, Parks and Open Space Element	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
20-6	Recommendations on the EIS include changes to the threshold of significant for plants and animals, additional information about rare and sensitive species and habitat types, projections of tree retention during development.	**20-6a** (Threshold of Significance): In this Final EIS, the threshold revised the threshold of significance definition for plant and animal species to clarify that the evaluation is not considering only impacts that would affect the survival or recovery of entire species. **20-6b** (evaluate and mitigate for losses of plant and animal populations within city boundaries): The urban ecosystems in Seattle are dramatically different from what the landscape supported before the arrival of Euroamerican settlers. Given this reality—combined with the city's current role in supporting human populations and economic activity—it is inevitable that urban habitats will support plant and animal communities that differ from those that characterized the pre-development landscape. The composition of those communities has been in flux for over a century and will likely continue to change. Managing habitats in the city to maintain wildlife populations in numbers comparable to past estimates is not feasible, nor is it consistent with the GMA goals of encouraging development in urban areas and reducing urban sprawl. Text is added to the EIS, acknowledging the presence of ESA-listed species in marine waters that receive stormwater runoff from the city. As discussed in **Section 3.1.1,** landcover across most of the city has been extensively modified for over a century by development, which has already resulted in long-term impacts to water quality in Elliott Bay. Redevelopment of areas associated with every alternative would be required to install permanent stormwater management systems to mitigate potential impacts from changes to the site runoff. These required stormwater management measures are designed to minimize pollution at the source; remove or reduce the amounts of pollutants in the stormwater before it enters the receiving water; or manage the rate at which stormwater flows into a receiving water, the separated storm conveyance system, or the combined sewer system. Furthermore, other recommended mitigation measures for water quality impacts include stand-alone considerations for reducing pollutants from roadways, which are not expected to be upgraded as part of the parcel redevelopments included in the alternatives.

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		20-6c (concern about tree retention during development, suggestion for alternative analysis approach): See **Exhibit 3.6-100 through Exhibit 3.6-105** in the Final EIS for illustrations of how trees can be retained during redevelopment projects. The Final EIS includes additional illustrations that show how new units in Neighborhood Residential areas can be designed to avoid impacts. It is also important to note that the City's 2023 tree ordinance updates provide strong incentives for prioritizing tree retention over tree replacement. Finally, the action alternatives including the Proposed Plan include policies that would implement a monitoring and adaptive management program to monitor changes and trends in the amount, distribution, and condition of the urban forest and use this information to shape urban forestry management plans, decisions, and actions. The analysis of potential impacts on tree canopy has been updated to incorporate consideration of developable lands, consistent with the approach used in **Section 3.1 Earth & Water Quality**. **20-6d** (concern about underestimate of development-related canopy loss): As was the case during the 5-year period that was evaluated in the 2021 tree canopy assessment, only a small proportion of developable/redevelopable lands will be developed in any given year or 5-year period. Any trees that cannot be retained on such lands will be replaced in accordance with the requirements of the city's tree ordinance. As those trees grow, they will provide canopy cover that matches—and, in cases where replacement ratios exceed 1:1, exceed—the cover on parcels where development occurs. As stated on page 3.3-27 of the Final EIS, existing regulations, in combination with the policies in the One Seattle Plan, are expected to minimize the potential for tree canopy loss by (1) restricting tree removal on private parcels, (2) requiring tree replacement to compensate for unavoidable losses, (3) requiring tree planting in public rights-of-way, and (4) encouraging the preservation and expansion of the tree canopy throughout the city for the aesthetic, health, and environmental benefits trees provide. In addition, action alternatives amend the Comprehensive Plan by adding climate resilience strategies that include reducing heat islands and increasing tree canopy.
21	**McCoy**	**House Our Neighbors**
21-1	Increase FAR for fourplexes and sixplexes and allow for more homes near transit by allowing midrise and mixed-use housing within a 5 minute walk of frequent buses.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
21-2	Expand neighborhood centers by increasing radius to ¼ mile and adding in all neighborhood centers studied in the Draft EIS, ensure	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision

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	density bonuses, increase height limits and green homes in Centers.	makers. See also **Section 4.2.1.3** regarding changes to dimensional standards to increase capacity in centers and additional and/or expanded neighborhood centers.
22	**Chávez**	**Black Home Initiative (BHI) Network**
22-1	The Plan should be bolder to ensure equitable Seattle. Study density bonuses, development regulation flexibility, land incentives and technical assistance.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
22-2	Land use changes to reduce displacement pressures include add all neighborhood centers, increase neighborhood centers to be inclusive of a ¼ mile radius, midrise and mixed use housing within a 5 minute walk of frequent transit, increase height limits, eliminate parking mandates.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
22-3	In Final EIS, study city land banking and land disposition process. Disaggregate projects about the number of housing units per AMI group from the city-level to a neighborhood or district level scale for comparative analysis. Suggest OPCD revisit community groups to present the Final EIS and zoning changes for feedback.	Regarding housing by income level, please see **Section 3.8 Population, Housing, & Employment** part 3.8.2 that compares alternatives, as well as **Section 4.2.1.1 Affordable Housing Evaluation.**
23	**Johnson**	**Friends of Ravenna-Cowen**
23-1	Concern and recommendations around proposed changes to the Neighborhood Residential zone to create an impetus for redevelopment of historic homes within the RCN NHD.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. Reference to the National Historic District (NHD) designation for Ravenna-Cowen is noted in **Exhibit 3.9-11** of the Final EIS. The commenter quotes draft policies intended to promote historic and cultural resources; the City will identify implementation plans for the One Seattle Plan after it is approved in final form. This also includes implementing policies that allow for middle housing in areas where single family homes are allowed.
23-2	Specific language changes to the Land Use and Housing elements around neighborhood centers, urban centers, and displacement.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
23-3	Ways the Draft EIS falls short to protect and enhance the natural	**23-3a** (statements in Draft EIS downplay the impacts of development on plants and animals):

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	environment, suggested changes to tree canopy, urban wildlife, mitigation, and access to public open spaces goals and policies.	The analyses in the Final EIS acknowledge the potential for development and redevelopment projects to adversely affect plants and animals. See, for example, the discussions on pages 3.3-13 to 3.3-14 of the Final EIS. See also, responses to comment themes in **Section 4.2.1.2** as well as additional analysis regarding tree canopy and vegetation, and clarifications of thresholds of significance on fish and wildlife in **Section 3.3** of this Final EIS. **23-3b** (concern that the 2023 updates to the tree ordinance are not sufficiently protective of tree canopy): The 2023 tree ordinance updates provide strong incentives for prioritizing tree retention over tree replacement. In addition, the action alternatives include policies that would implement a monitoring and adaptive management program. Information gathered through regular monitoring would be used to assess the City's progress toward meeting the canopy cover goal and to identify actions to improve trends, as needed. **23-3c** (concern about statements regarding potential benefits to plants and animals outside the city limits): Statements in **Section 1.6.3** and **Section 3.3** about potential beneficial impacts on tree canopy in areas outside the city have been revised for clarity. See Final EIS page 3.3-16 for more discussion of the reasoning behind the expectation that encouraging residential and commercial development within the urban environment of Seattle could indirectly benefit plants and animals in less-developed areas outside the city.
24	**Stewart**	**Ballard Alliance**
24-1	Suggested changes and areas for further review specific to the Ballard neighborhood include expediating the subarea plan if Ballard is designated as a regional center and include the Ballard Alliance in this process. Preserve existing density along Market Street retail core, perform a cumulative transportation analysis, adjust the housing to jobs ratio for the Ballard Regional Center, more public safety, and increased green space investment.	Request for additional transportation analysis: The Final EIS incorporates roadway capacity changes proposed in the Seattle Transportation Plan considering cumulative growth assumed under Alternative 1 and the Preferred Alternative. See **Section 3.10 Transportation**. Detailed evaluation of specific multimodal improvements would be conducted by SDOT through project development.
25	**Lazerwitz**	**Roosevelt Neighborhood Association**
25-1	A series of questions about the implications of the Comp. Plan to the Roosevelt Neighborhood, impact of HB 1110 on current single-family zoning, definition of a	Comment noted and will be forwarded to decision makers. Provisions of HB 1110 and their consideration in Seattle are explained in a Seattle Fact Sheet.[99]

[99] See: https://www.seattle.gov/documents/departments/opcd/seattleplan/implementinghb1110.pdf.

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	major transit stop, and historic preservation designation.	
26	**Gurkewitz, Williams**	**Thornton Creek Alliance**
26-1	While the Plan and the SEPA Draft EIS evaluating the Plan are comprehensive, they fall short in several areas. Attached are our comments to help improve the Plan and Draft EIS and address those areas that require additional attention.	Please see responses to comments below.
26-2	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.	The non-project EIS provides analysis at a cumulative citywide scale as well as by area and by the 130th/145th Station Area. As noted in WAC 197-11-442 (and Final EIS page 2-16) the analysis of plans and policies is broader and less detailed than for project proposals. Additionally the EIS identifies the cumulative effects in the context of the region (e.g., air quality/GHG, transportation model) or with multiple impact sources (e.g., noise). The EIS covers direct and indirect impacts. WAC 197-11-060 (4)(d) indicates that: "Impacts include those effects resulting from growth caused by a proposal, as well as the likelihood that the present proposal will serve as a precedent for future actions. For example, adoption of a zoning ordinance will encourage or tend to cause particular types of projects..." Each alternative would direct growth differently and offer different mixes of place types (similar to zoning) that would indirectly result in new land use patterns and need for infrastructure evaluated for example in Sections 3.6 Land Use Patterns & Urban Form, 3.10 Transportation, 3.11 Public Services, 3.11 Public Services, and 3.12 Utilities.
26-3	A concern there are missing mitigation measures. 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.	See WAC 197-11-158 and WAC 197-11-330 (1)(c) which reference a lead agency should consider regulations: "Consider mitigation measures which an agency or the applicant will implement as part of the proposal, *including any mitigation measures required by development regulations, comprehensive plans, or other existing environmental rules or laws*." (italics added) The City will be required to show effectiveness in its housing approaches through: annual reports to the King County Affordable Housing Committee (Countywide Planning Policies) and five-year reports to the Department of Commerce (RCW 36.70A.130(9)) The Proposed Plan includes draft policies to monitor effectiveness of housing (H 2.2) and tree canopy plans and actions (CE 12.5).
26-4	Regionally set growth targets include 80,000 homes and 158,000 jobs over the next 20 years. Why	All alternatives test job growth consistent with regional targets in VISION 2050 and King County Countywide Planning Policies. The key changes in GMA laws and Countywide Planning Policies over

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	does the Draft EIS evaluate alternatives with greater housing needs of 100,000 and 120,000 while employment projections remain the same? Need citation and explanation.	the last several years were to increase housing supply and affordability. Thus the alternatives vary housing growth levels: The alternatives are responding to VISION 2050 MPP-RGS-7 that suggests greater housing in Metropolitan Cities like Seattle. As **Exhibit 3.7-8** describes, "The action alternatives increase housing growth above minimum growth targets to better balance jobs and housing and to provide for middle housing as well as focus growth around high-capacity transit, especially Alternatives 4 and 5. This is consistent with MPP-RGS-7 that suggests greater housing in Metropolitan Cities like Seattle and MPP-RGS-12 that shows a priority of growth around high-capacity transit." Additionally, the EIS scoping report in **Appendix A** explains the differences in growth as relating to maintaining 80,000 new growth principally in existing designated centers, and then considering alternative allocations "encouraging housing choice in all neighborhoods while focusing additional growth in areas with low displacement risk."
26-5	Where does the assumption that 15% of new jobs would be shifted to the location of new housing come from?	EIS **Exhibit 1.1-1** notes that 15% of new jobs would be shifted based on the location of new housing under Alternatives 2-5. The distribution of housing varies by neighborhood centers, Neighborhood Residential zones, corridors, and all types of nodes and corridors 15% represents the portion of jobs added between 2010 and 2020 that were in the following sectors: food and beverage stores; health and personal care stores; gasoline stations; clothing stores; sporting goods, hobby, book, and music stores; general merchandise stores; miscellaneous store retailers; non-store retailers; real estate; rental and leasing services; and food service and drinking places. These sectors represent businesses that tend to locate based on residential patterns as compared to office buildings.
26-6	The Draft EIS 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 Draft EIS. 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.	The analyses in the EIS have been expanded to address the potential for temporal loss (i.e., time lag between the loss of functions provided by removed trees and the replacement those functions by planted trees) of the essential benefits provided by tree canopy cover.
26-7	While the Draft EIS cites numerous federal regulations, it is unclear how it will comply with them. ▪ Clean Water Act – How does the current City's Stormwater Municipal Permit address future development? Will discharge	The federal regulations identified in the EIS apply to individual projects, not to planning-level documents such as the One Seattle Plan.

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	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? ▪ 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?	
26-8	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. Limited enforcement currently. Unclear if with the proposed comp plan changes, the City be able to use SEPA authority.	See response to Comment 26-3 regarding use of regulations as mitigation including tree canopy regulations and ongoing monitoring. The City anticipates applying an infill exemption to residential uses per RCW 43.21c.229, but regulations will continue to apply.
26-9	The growth concept presented in the Draft Plan and evaluated in the Draft EIS prioritizes the built environment (housing, jobs, transportation) over the natural environment. Integrating best available science to protect critical areas (ECAs) does not prevent tree loss outside of ECAs. The highest tree loss across Seattle, as reported in the City's 2021 Canopy Assessment, occurred in parks, natural areas, and Neighborhood Residential areas.	The City is required to consider best available science in critical area regulations, as well as to offer housing affordable at all income levels per GMA. The City needs to address both natural and built environment quality. The City has an urban forest management plan and a goal of 30% tree canopy, and the City intends to monitor its plan and action in the Proposed Plan (Policy CE 12.3).
26-10	Concerns and missing analysis to the earth and water quality.	▪ "It is unclear how this applies to Seattle because there are relatively few undeveloped areas outside of the City." It is assumed the comment is referring to the following text passage: "As outlined in Vision 2050 (PSRC, 2020), focusing growth in ***previously developed urban areas*** [emphasis added] will result in less impact on ***regional*** [emphasis added] earth and

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		water resources than focusing the same growth in ***previously undeveloped areas outside of cities*** [emphasis added] that add new impervious surfaces controlled under current standards." The passage in **Section 3.1.2** refers to undeveloped areas in our region. The passages further qualifies that the undeveloped areas referred to are generally those located outside of all cities. The passage is not referring to the specific land immediately outside of and adjacent to the City of Seattle boundary, as that land is also located in previously developed urban areas that include the incorporated cities of Shoreline, Lake Forest Park, Burien, Tukwila, and Renton. ▪ "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." Such an analysis is outside of the scope of this impact evaluation which is citywide and focused on the City's land use plans and regulations and reviewing changes from current conditions to a future 20-year period of 2044. VISION 2050 provides a four county growth strategy, and supersedes VISION 2040. These plans were evaluated with an EIS and considered growth patterns that were more compact versus less compact and effects on the natural environment. ▪ "Section 1.6.1... water quality... 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 metrics (construction, vehicle use, increased hard surfaces, and development proximity to water resources) presented in **Section 1.6.1** and later in **Section 3.1 Earth & Water Quality** are all sources and indicators of impacts from pollutants and temperature increases specific to the planned actions. ▪ The Comprehensive Plan Policies do not intend to maintain the status quo, but rather mitigate against the impacts identified as specific to the proposed actions. ▪ "Additional stormwater management in areas of the City that are already developed" is recommended in **Section 3.1.3** Other Potential Mitigation Measures: Install updated stormwater controls on roadways, which are not likely to be upgraded as part of the parcel redevelopments included in the alternatives. Roadway retrofitting has been found to be the most immediate action to improving water quality in urban areas. ▪ The City will continue to comply with the requirements of the latest version of the Municipal Stormwater Permit. The City has determined that changes to the *Stormwater Code and Manual* are not necessary in response to the impacts identified in this analysis. ▪ Please see **Section 3.3 Plants & Animals** for discussion of tree canopy.
26-11	Comments regarding Air Quality & GHG evaluation.	As discussed in **Section 3.2** (page 3.2-22), air quality and GHG modeling assumes the build out of each alterative in the year 2044. It is standard practice to assume the emission factors from build out year in this analysis to provide a reasonable estimate of

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		future emissions resulting from build out of the Plan. The MOVES model covers a 31-year range of vehicle ages (MOVES4 Technical Guidance, 2023). It is assumed that current trends in fuel economy improvements governed by standards established by the National Highway Traffic and Safety Administration (NHTSA) would continue. In addition to continued improvements in fuel economy, Washington State requires that 100 percent of sales of passenger cars, light-duty trucks, and medium-duty vehicles be zero emission (i.e., electric) by the year 2035. Further, as discussed, increased density and access to transit would result in shorter trip lengths, lowering VMT (WSDOT 2013). All of these factors combined, it is not speculative to assume that increases in VMT would be outweighed by future fuel economy and fleet mix as NHTSA continues to regulate fuel economy and annual increases in zero emission vehicles increase. Cumulative/Indirect Impacts: Please see response to Comment 26-2. The Air quality & GHG analysis is cumulative and called out that way. Regarding heat islands it is discussed in Final EIS **Section 3.3, 3.4, 3.6, 3.11,** and **3.12**, and mapped on **Exhibit 3.11-52**. **Section 3.2** includes discussion of residential strategies to reduce the potential level of air toxics. Included in the discussion is the incorporation of denser tree canopy. See also **Section 4.2.1.2 Tree Canopy Evaluation**. Regarding improved air filtration, Final EIS **Section 3.2** (page 3.2-50) includes discussion of enhanced air filtering and circulation systems that can be integrated into HVAC systems and ventilation systems.
26-12	Set of questions and additions to improve Plants and Animals section 3.3.	Threshold of significance: See response to Comment 20-6a. Impacts on individual species: See response to Comment 20-6b. Requests for more detailed analysis: Analyses in the EIS are consistent with SEPA requirements for programmatic, non-project reviews, per WAC 197-11-442. ESA-listed species: Comment noted. This comment is beyond the scope of environmental review of the One Seattle Plan so no response is necessary. Also see response to Comment 20-6b.
26-13	Use same methodology as Seattle Maritime Lands Final EIS for Plants & Animals.	Analyses in the EIS are consistent with SEPA requirements for programmatic, non-project reviews, per WAC 197-11-442.
26-14	How is threshold for tree canopy cover loss measured? What about large versus new trees addressed?	See Response to Comment Theme #2 from Letter 95, **Section 4.2.1.2 Tree Canopy Evaluation**. Also see response to Comment 26-6.
26-15	Plants and Animals section is inconsistent with City SEPA policy SMC 25.05.675 N Plants and Animals. How will mitigating measures in that policy be met?	The provisions in SMC 25.05.675 are for the purpose of reviewing project-specific proposals and potentially conditioning them if there are gaps in codes. See SMC 25.05.665(D). The Proposed Plan and associated development regulations are opportunities to amend policies and plans to reflect current conditions and needs.

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26-16	Missing information on urban wildlife corridors such as riparian corridors like Thornton Creek. There are also parks and ravines. Show on Figure 3.3.-2. Evaluate analysis of degraded water on urban wildlife.	The EIS has been revised to include discussions of urban corridors and the impacts of degraded water quality on wildlife. See **Section 3.3 Plants & Animals** of this Final EIS.
26-17	Focus on plants and animals impacts in Seattle, not region or state. Address loss of tree canopy cover in relation to impervious area standards, and temporal loss.	Analyses in the EIS evaluate impacts on plants and animals in Seattle while also placing those impacts in a regional context. Analyses relating to impervious areas standards are addressed in Section 3.1, Geology and Water Quality. The analyses in the EIS have been expanded to address the potential for temporal loss (i.e., time lag between the loss of functions provided by removed trees and the replacement those functions by planted trees) of the essential benefits provided by tree canopy cover.
27	**McAleer 1**	**Laurelhurst Community Club Council**
27-1	Review of draft Growth Strategy policies; concern about building heights, and concerns around changing parklands to housing.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
27-2	Comments regarding Draft One Seattle Growth Strategy. Concern about aging in place with taxes. Ability of City to provide adequate infrastructure. Avoid piecemeal projects with exceptions. Aurora Avenue and other areas as an urban center. Limit height in neighborhood centers less than 5-6 stories. Do not change parks to housing.	**Aging in place:** Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. The action alternatives evaluate different growth levels and place types meant to increase supply and housing that is affordable to allow for greater options for a range of lifestyles. The King County Assessor offers senior or disabled exemptions and deferrals. **Infrastructure:** The One Seattle Plan provides a Capital Facilities Element and Utilities Element. The City also creates a Capital Improvement Program based on long range utility system plans. See Final EIS Sections 3.10 to 3.12 regarding transportation, public services, and utilities meant to identify current and expected demand for infrastructure. **Avoid exceptions:** Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. The City must provide avenues for rezones, appeals, etc. per state planning laws. (RCW 36.70 and 36.70c) **Aurora Avenue as Center:** Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

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		Neighborhood Centers and Height: The potential for impacts due to changes in urban form are addressed in EIS **Section 3.6**. **Do not change parks to housing:** Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
27-3	Series of questions and edits to land use around urban design, built environment, off street parking, commercial zones, industrial zones, and historic preservation and cultural resources. ▪ The infrastructure in the City was not built for all densities (e.g., width of streets, sewer). ▪ How will projects be considered "high quality" if SEPA and Design Review are not part of the regulatory process? ▪ Support protecting the public view corridors. ▪ Preserve historic and cultural resources. ▪ Promote daylighting streams. ▪ Regulations for abandoned landfills.	**Infrastructure:** See sections on **Transportation**, **Public Services**, and **Utilities** for analysis on planning for adequate infrastructure. **Review Processes:** City standards for zoning, design, utilities and more would apply to new development even where extra review is not part of the process. See **Appendix C** regarding infill exemptions. **Public View Corridors:** Public view corridors and views of designated Seattle Landmarks and other natural and human-made features are protected under City code; see EIS **Section 3.6 Land Use Patterns & Urban Form**. Public view corridors are protected under current Seattle zoning, shoreline, and environmental regulations and will continue to be protected. These are mapped and overlaid with the land use alternatives in **Exhibit 3.6-83, Exhibit 3.6-92, Exhibit 3.6-107, Exhibit 3.6-109**, and **Exhibit 3.6-113**. **Preserve Cultural Resources:** Comment noted. This comment is beyond the scope of environmental review of the One Seattle Plan so no response is necessary. regarding Laurelhurst Community Club's comments on re-use, the City's Indigenous history, education and outreach, and the value of historic preservation for Seattle's livability. Many of the volunteers on the Landmarks board are experts in historic architecture with broad understanding and knowledge about the city's historic resources. The Department of the Interior's Standards are the guidelines used by the Seattle Landmark's Board for granting Certificates of Approval after they review designs for any changes to designated Landmarks or for new construction in historic districts. **Stream Restoration:** See SMC 25.09.200(5). This is listed in reference to infill development in **Appendix C**. **Abandoned Landfills:** See 25.09.220. This is listed in reference to infill development in **Appendix C**.
27-4	Series of concerns, suggested edits and questions on the Transportation element related to sidewalks, reallocation of street space, building a green transportation system, and funding.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also the Seattle Transportation Plan and its EIS regarding transportation options and priorities.
27-5	Series of concerns, suggested edits and questions about the Housing element related to equitable access	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision

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	to housing, housing security, quality, and homelessness.	makers. See also response to Comment 27-2 for related comments on aging in place, quality of development and application of standards.
27-6	Series of concerns, suggested edits and questions about the Climate and Environment element related to transportation, tree canopy, sea level rise and flooding,	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. In each section of the EIS climate and equity considerations were addressed. Reference to the City's existing climate mitigation and adaptation plans were also identified in appropriate topic areas. Regarding tree canopy see response to comments to Letter 26. For sea level rise and flooding, please see response to Comment 5-4.
27-7	Series of concerns, suggested edits and questions about the Arts and Culture element around place keeping, public art, and youth education.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
27-8	Series of concerns, suggested edits and questions about the Parks and Open Space element around equitable provision of public space, operations and maintenance, and partnering with communities. Concern about SEPA and noise from activities from abutting parks and residential uses.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. The comment addresses the Parks and Open Space Element of the Comprehensive Plan. The Final EIS addresses Parks and Open Space in **Section 3.11**. In response to Policy 1.19 to mitigate noise on public space, the commenter notes support but asks what SEPA process is used for pickleball courts that are noisy. Regarding noise and SEPA, see SMC Chapter 25.08 - Noise Control.
27-9	Series of concerns, suggested edits and questions about the Community Involvement element around engaging residents equitably, and Indigenous engagement.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
28	**McAleer 2**	**Laurelhurst Community Club Council**
28-1-8	Same as Letter 27.	Please see responses to Letter 27.
29	**McAleer 3**	**Laurelhurst Community Club Council**
29-1	Similar content to 27-2. Concerns on how to finance increased infrastructure needs and public amenities to match demand with increase in new residents.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
29-2	Similar content to 27-2. Supports more regional and urban centers proposed at Northgate and 130th	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes

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	and for future ones in West Seattle Junction and Rainier Valley. Suggest Aurora Ave be designated urban center with a Master Plan.	related to the One Seattle Plan will be forwarded to decision makers.
30	**McAleer 4**	**Laurelhurst Community Club Council**
30-1	List of Land Use policies that LCC supports, does not support, and has questions about. Topics include development standards, parking, and public facilities.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also Response to Comment 27-3.
31	**McAleer 5**	**Laurelhurst Community Club Council**
31-1	List of Land Use policies that LCC supports, does not support, and has questions about. Topics include tree canopy, urban design, and built environment	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also Response to Comment 27-3.
32	**McAleer 6**	**Laurelhurst Community Club Council**
32-1	List of Land Use policies that LCC supports, does not support, and has questions about. Topics include historic preservation and cultural resources and environmentally critical areas.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also response to Comment 27-3.
33	**McAleer 7**	**Laurelhurst Community Club Council**
33-1	Similar content as 27-4.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also the Seattle Transportation Plan and its EIS regarding transportation options and priorities.
34	**McAleer 8**	**Laurelhurst Community Club Council**
34-1	Similar content to 27-4 and 5 about the Transportation and Housing Elements.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also the Seattle Transportation Plan and its EIS regarding transportation options and priorities. See also response to Comment 27-2 for related comments on aging in place, quality of development and application of standards.
35	**McAleer 9**	**Laurelhurst Community Club Council**
35-1	Similar content to 27-5 about the Housing Element.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes

Number	Comment Summary	Response
		related to the One Seattle Plan will be forwarded to decision makers. See also response to Comment 27-2 for related comments on aging in place, quality of development and application of standards.
36	**McAleer 10**	**Laurelhurst Community Club Council**
36-1	Similar content to 27-5 and 6 about the Housing and Climate and Environment element.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also Responses to Comments 27-2 and 27-6.
37	**McAleer 11**	**Laurelhurst Community Club Council**
37-1	Similar content to 27-6 about the Climate and Environment element.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also Response to Comment 27-6.
38	**McAleer 12**	**Laurelhurst Community Club Council**
38-1	Similar content to 27-7 regarding Arts and Culture.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
39	**McAleer 13**	**Laurelhurst Community Club Council**
39-1	Similar content to 27-8 about the Parks and Open Space element.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See Response to Comment 27-8.
40	**McAleer 14**	**Laurelhurst Community Club Council**
40-1	Similar content to 27-9 about the Community Involvement Element.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
41	**McAleer 15**	**Laurelhurst Community Club Council**
41-1	Similar content to 27-2 about Growth Strategy.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
42	**McAleer 16**	**Laurelhurst Community Club Council**
42-1	Similar content to 27-3 regarding Land Use.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes

Number	Comment Summary	Response
		related to the One Seattle Plan will be forwarded to decision makers.
43	**McAleer 17**	**Laurelhurst Community Club Council**
43-1	Similar content to 27-3 about Growth Strategy.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
44	**McAleer 18**	**Laurelhurst Community Club Council**
44-1	Where is the definition of affordability that is used in the Draft EIS? 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?	See **page 3.8-15**, which identifies housing costs; less than 30% of their gross income for housing is affordable. The percent of area median income is based on the 2022 HUD Median Family Income on Final EIS **page 3.8-12**. The state definitions of affordability used to allocate targets are found in the Growth Management Act (per HB 1220) in RCW 36.70A.030 and 070: moderate (at or below 120 percent AMI), low (at or below 80 percent AMI), very low (at or below 50 percent AMI), and extremely low-income (at or below 30 percent AMI) households. HB 1110 refers to GMA definitions.
44-2	In the Draft EIS 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? 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 Draft EIS acknowledge this? 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? Can duplexes, triplexes, fourplexes, sixplexes, stacked flats and courtyard apartments be developed in Urban Residential	See **Section 4.2.1.1** regarding the affordable housing evaluation. Final EIS **Section 3.8.2** also includes an analysis of projected affordable units by alternatives, including the affordability of new market housing supply (**page 3.8-45**) as well as estimated production of new affordable units through MHA and MFTE (**Exhibit 3.8-43, Exhibit 3.8-44, Exhibit 3.8-45,** and **Exhibit 3.8-49**). As discussed on **page 3.8-45**, market rate housing price escalation is caused by competition for a limited supply of homes. By allowing for increased housing production, the City can increase the housing supply and reduce the competition for available units. This is expected to reduce upward pressure on market rate housing rents and housing prices.[100] HB 1110 provides a definition of "affordable housing" for the purpose of setting income limits for income-restricted housing units required for an increased density allowance enabled by that legislation. The term "affordable" refers to housing that costs less than 30% of the occupant's household income. This definition is in the Final EIS. It is likely that new market-rate townhomes would not be affordable to households with incomes below 80% AMI. The EIS draws on recent development trends in similar zones to develop assumptions about the most likely types of new housing development by zone under each alternative. The results are shown in **Exhibit 3.8-41.** With regards to incentives in Neighborhood Residential zones, under HB 1110, Seattle must allow up to 6 units per lot (i.e., 2 bonus units) if at least 2 are affordable. The proposed Neighborhood Residential zones would

[100] See the MHA Final EIS Appendix I Housing Production and Cost: A Review of the Research Literatures available in an online archive: AppI_MHA_FEIS_2017.pdf.

Number	Comment Summary	Response
	areas given lack of economies of scale?	also allow additional height (up to 4 stories), floor area (FAR of 1.8), and density (up to 1 unit per 400 square feet of lot area) on sites within a quarter-mile of frequent transit where at least half the units are affordable to further incentivize affordable housing. City analysis projects 8-10% of Neighborhood Residential-zoned lots are potentially redevelopable with middle housing over the next 20 years. For-profit and non-profit developers have built middle housing types, especially townhouse-style duplexes, triplexes, and other multiplexes in Seattle and nearby cities. Middle housing is primarily intended to supply home ownership opportunities, though both rental and ownership types have been built. See **Exhibit 3.6-100 through Exhibit 3.6-105** for illustrations of potential Neighborhood Residential block redevelopment over the next 20 years.
44-3	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 Plan acknowledge that planting new trees takes 20-30 years to provide tree canopy, to shade houses, or to combat heat islands?	The source of the estimated rate of future tree canopy loss is not clear. If that estimate was derived from the 2022 City of Seattle Tree Canopy Assessment, please note that the City updated its regulations after that study was completed, implementing stronger requirements for tree retention and tree replacement. See also **Section 4.2.1.2** regarding tree canopy. Analyses in the EIS have been expanded to address the potential for temporal loss (i.e., time lag between the loss of functions provided by removed trees and the replacement those functions by planted trees) of the essential benefits provided by tree canopy cover.
44-4	Where does the Plan acknowledge that supply-side trickle-down housing takes 30-40 years to age into natural affordability?	Comment noted. Comments on the plan are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also Response to Comment 44-2.
44-5	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?	The EIS evaluates Alternative 5 and the Preferred Alternative as adding 120,000 dwelling units. The City's Housing Element is meant to address housing targets in the Countywide Planning Policies. The targets are based on a state and regional method recognizing housing needs across all income levels. Projected housing types and affordability are considered relative to adopted housing targets by income level for each alternative.
44-6	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?	Seattle does not regulate the number of bedrooms in new housing development through zoning, with the exception of family-sized unit requirements in LR1 zones. These requirements are not proposed to change under the action alternatives. However, incentives such as MFTE and MHA do reference number of bedrooms when setting affordability requirements. These requirements are also not proposed to change under the action alternatives. This EIS does not analyze the impacts of past City actions with regards to family-sized housing definition, or potential impacts of future actions not related to the action alternatives.

Number	Comment Summary	Response
44-7	What zoning tools are available, including MHA, to require more family-sized 3-bedroom rental housing at all income levels?	See also Response to Comment 44-6.
44-8	Where does the housing plan acknowledge the needs of seniors and people with disabilities for accessible housing without stairs?	Comment noted. Suggestions for policy changes or on plan elements are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. Under the Preferred Alternative's proposed Neighborhood Residential zoning, stacked flats will have a floor area ratio (FAR) bonus and density bonus—beyond other middle housing types—when located on lots at least 6,000 square feet within ¼ mile of transit (see "Stacked flat bonus" on Updating Seattle's Neighborhood Residential zoning's page 8). Stacked flats are housing units where the entire living space of an individual unit is contained on one floor and stacked on top of other units. Although such buildings will still include stairs to reach the upper story units, the ground floors can be ADA-accessible, and the upper story units can accommodate less stair use than a townhouse or a multistory single-family house. Additionally, the City could explore updating the elevator regulations in the Seattle building code to significantly reduce the cost of elevators. Such changes would make it more viable for developers to add elevators to small projects—increasing their accessibility—that are three to four stories tall, instead of such projects being walk-up buildings. The City continues to partner with land trusts and non-profit housing developers to encourage desired development.
44-9	What is the effect of lacking 11,000 blocks of sidewalks on our vision of a 15-minute city?	**Exhibit 3.10-12** and **Exhibit 3.10-13** in the Final EIS show existing pedestrian facilities and sidewalk connectivity, including the lack of sidewalks north of North 85th Street as noted by the commenter. See the Active Transportation subsection in Impacts Common to All Alternatives in **Section 3.10.2**. **Exhibit 3.10-32** and **Exhibit 3.10-33** in the Final EIS summarize the population and employment within low, medium, and high sidewalk connectivity census tracts for each alternative as well as existing conditions. A more detailed inventory of sidewalks and their condition may be found in the Pedestrian Element of the Seattle Transportation Plan, along with prioritization criteria that will guide the City's investments in pedestrian infrastructure.
44-10	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.	Comment noted. Suggestions for policy changes or on plan elements are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

4.2.2.4 Property Specific

Exhibit 4.2-4. Written Comments and Responses, 2024—Property Specific

Number	Comment Summary	Response
45	**Aggerholm**	**Grousemont Associates, QA Canal LLC**
45-1	Support any additional density in area just off the Ballard Bridge between SU to make development more achievable. Own several properties including on 13th Avenue West.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
46	**Baumgartner**	
46-1	Request NC2-55 zoning for church owned property at 133rd and 1st Ave NE (Lots 3, 4, and 5 of block 65, in the H.E. Orr Park Division No. 6) so the church can redevelop as mixed use with possible supportive housing.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
47a	**Boyd**	**Bellwether Housing 1**
47a-1	Bellwether Housing owns and operates the Kingway Apartments, an existing affordable housing community located at 5952 Martin Luther King, Jr. Way S. Property is within walking distance of a future light rail station but is currently split zoned Midrise and NC-2 with a 55' height limits. Encourage OPCD to consider heights and densities commensurate with NC zoning on the entire site, with height limits up to 125'. Also encourage the City to look at similar sites citywide as part of Comprehensive Plan implementation to ensure they are not split zoned.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
47b	**Boyd**	**Bellwether Housing 2**
47b-1	Bellwether Housing is working with North Seattle College to develop the underutilized southwest corner of campus as affordable housing. Request the City study an expansion of the Northgate Regional Center and include the area underlying the North Seattle College MIMP into the One Seattle Preferred Action.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

Number	Comment Summary	Response
48	**Clawson**	**West Roy LLC**
48-1	Support Alternative 5. West Roy LLC owns property at 14 West Roy in the Uptown neighborhood, currently used for warehousing and retail purposes. Request the Final EIS study expansion of the Uptown Urban Center further to the north and an increase in minimum urban center height limits generally from 85 and 125 feet.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
49	**Clawson**	**Nicola Wealth**
49-1	Support Alternative 5. Nicola Wealth owns property at 155 NE 100th Street and 9725 3rd Avenue NE. Request the Final EIS and Northgate Regional Center Subarea Plan study 240 feet in height feet in height on the property as it is a key opportunity to maximize housing unit delivery.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
50	**Clawson**	**Alteutian Spray Fisheries**
50-1	Aleutian Spray Fisheries owns property at 2157 N Northlake Way zoned Urban Industrial with a height limit of 45' (Industrial and Maritime Strategy allow a limited amount of workforce residential development in the zone). Aleutian feels strongly that more workforce housing is needed in Seattle. Request the Final EIS study a height limit of 65' for residential uses in the UI/U-45 zone on Aleutian's sloped property between Waterway 19 and the Sunnyside Avenue N Boat Ramp.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
51	**Clawson**	**Lee Johnson**
51-1	Support Alternative 5. Lee Johnson owns several properties in Northeast Seattle, generally in Roosevelt, Lake City, and north of Wedgewood. Request the Final EIS: ▪ Protect Lake City Way as a commercial corridor, study C1-75 zoning for all mentioned properties. ▪ Study more housing in Downtown with more	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

Number	Comment Summary	Response
	commercial uses/jobs in the neighborhoods (to support job/housing balance). ▪ Analyze growth directed towards commercial corridors outside centers and villages (e.g., Lake City, 15th Avenue NE, and Roosevelt). ▪ Consider rezoning much larger and deeper swaths along corridors to commercial zones to eliminate the awkward and sometimes impactful transitions that occur when C zones and NR zones directly abut each other and to support more commercial development. ▪ Ensure the City utilizes 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. ▪ Eliminate split zoned conditions as part of implementation.	
51-2	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 listed properties and add a Growth Strategy that discusses commercial uses and commercial zones. 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. Specific edits to Policy LU 1.3.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
52	**Clawson**	**70th & Greenwood Ave LLC 1**
52-1	Email directing attention to Letter 53.	See Response to Comment 53.
53	**Clawson**	**70th & Greenwood Ave LLC 2**
53-1	70th & Greenwood Ave LLC owns four contiguous parcels at 7010	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and

Number	Comment Summary	Response
	Palatine Avenue North and 7009 Greenwood Avenue North in Phinney Ridge. Support for Phinney Ridge's continued evolution as a complete and walkable neighborhood. Support the continued inclusion of Policies GS 5.1 in future versions of the Plan Update and EIS. Request the parcels be included within a Phinney Ridge Neighborhood Center similar to that depicted in the image from page 20 of the Draft Plan Update.	alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
54	**Cramer**	**Individual**
54-1	Request to upzone 4709 9th Avenue NE (APN 0889000030) from LR1 to MR. Request to consider similar upzones and redesignation for surrounding neighborhood as it is just outside the University District Regional Center (or possibly inclusion in the center boundary).	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required.
	Daniel	**Haller Lake United Methodist Church**
	See Letter 174.	See Letter 174.
55	**Dunn**	**Dunn & Hobbes, LLC**
55-1	Support for Alternative 5. Owner/partner of four sites currently zoned NC-5 in the Central District neighborhood. Request to study additional height and density and revised setback requirements on small/shallow parcels zoned NC-55 to encourage development and create a workable MHA program. Suggested ideas 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 (increase FAR so full 5th story is possible, reduce/eliminate frequency of NC-zoned sites abutting Neighborhood Residential zones, elimination of upper-level setbacks when NC/NR transitions do occur to prioritize housing development).	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also **Section 4.2.1.3** regarding changes to zoning standards in centers.

Number	Comment Summary	Response
56	**Fiorito**	**Fiorito Family**
56-1	Owners of the properties that comprise nearly a full block bounded by NW 48th Street, NW 49th Street, 8th Ave NW, and 9th Ave NW in northeast Ballard. City removed the property from the BINMIC as part of the Industrial and Maritime Strategy but the block is still designated industrial on the FLUM. Request the Final EIS study this property and other isolated lands outside the BINIMC for the Ballard Regional Center designation with appropriate heights as adjacent to the 8th Ave NW frequent transit corridor.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
57	**Gunter 1**	**Alexandria Real Estate Equities, Inc**
57-1	Alexandria Real Estate Equities owns the Salvation Army property located at 1000 4th Ave S. The property is within the Greater Duwamish MIC and zoned II 85-240. Request to remove from the MIC and incorporate into the Downtown Regional Center. The II 85-240 zone is more akin to a Downtown zone and is/will be supported by light rail (existing Union Station and possible future "CID South").	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
58	**Gunter 2**	**Alexandria Real Estate Equities, Inc**
58-1-3	Same content as Letter 11.	See responses to Letter 11.
59	**Chhan and Enslow**	**Individual**
59-1	Own two properties in the First Hill/Capitol Hill Regional Center, both currently developed with single-family residences (one is currently used as an office). Support the Mayor's vision for the One Seattle growth strategy overall but encourage the City to evaluate additional height and density inside the First Hill/Capitol Hill Regional Center (specifically near Roy Street should zone for heights of 95', especially for mass timber buildings).	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

Number	Comment Summary	Response
60	**Harel**	**Era Living**
60-1	Owner of the Ida Culver House in Ravenna. Support Ravenna's continued progress towards becoming a complete and walkable neighborhood and additional zoned capacity within the Ravenna neighborhood generally and specifically on both sides of the 65th Street commercial corridor. 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. Request the Final EIS study impacts of resolving split-zoning within the neighborhood in favor of the higher density zoning, including the Ida Culver House property (rezoning the whole parcel to NC).	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. It should be noted that in 2025 OPCD anticipates proposing legislation that will address split zone lots throughout the city.
61	**Heglund**	**MRH Properties LLC**
61-1	MRH Properties owns two parcels at 1103-1109 N 36th St in the Fremont Hub Urban Village. Properties are not within nor bordering an MIC. Support for creation of the Fremont Urban Center and request rezone for neighborhood commercial use (instead of Industrial Commercial) consistent with Fremont Urban Center, Policy LU 13.11, and expected growth needs.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
62	**Keck**	**Schnitzer West**
62-1	Schnitzer West owns properties at 570 and 550 Mercer St in the Uptown Regional Center. Support for Alternative 5 but with heights of at least 125 feet for the properties to support residential development in this center-city neighborhood (and consistent with surrounding higher height limits).	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

Number	Comment Summary	Response
63	**Kramer**	**Individual**
63-1	Own home at 8th Ave and 130th St. Did not support the nearby light rail station and does not support the proposed heights/densities near the station without clear mitigation strategies, particularly related to loss of tree canopy and parking from apartment buildings and those accessing light rail.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also **Section 4.2.1.2** regarding tree canopy.
64	**Lai 1**	**DCL Management LLC**
64-1	DCL UW owns property located at 4552 University Way NE, on the corner of 47th Street and "The Ave" in the heart of the U District. Support for Alternative 5. Request the Final EIS study mixed-use zoning (Seattel Mixed) of up to 240' along University Way NE at least north of NE 46th Street to encourage mixed-use redevelopment of the property and surrounding North Ave properties.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
65	**Lai 2**	**DCL UW LLC**
65-1	Same content as Letter 64.	See response to Comment 64.
66	**Lehmann, Gillespie, Soules, Liebman**	**Lander Street Owners**
66-1	Industrial property owners and business operators in the Greater Duwamish MIC that own over 25-acres around the expanded Lander Street light rail station (in the Industry and Innovation U/160 zone). Believe the Draft Plan should study policies to allow a "Lander Center" node TOD concept – potentially including residential (with workforce housing units), industrial, office, entertainment, hospitality, schools, hospitals, and training facilities – at the expanded Lander Street station (supported by Policies LU 13.3 and 13.27). Request the Final EIS study the "Lander Center" node or start a master planning process for the area. City should also evaluate the implementation of the II around light rail stations either as part of the "Lander Center" node concept	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. No rezone or master planning of this area is proposed at this time.

Number	Comment Summary	Response
	or as part of the implementation of the Draft Plan. Request the II zone support the opportunity for new hospital and educational opportunities near light rail.	
67	**Marasco**	**Security Properties**
67-1	Support the Draft Plan and its neighborhood center goals. Request to resolve conflicts with the City's Principal Pedestrian Street zoning and the goals outlined in the Plan and to study these changes in the Final EIS. Currently proposing a new mixed-use development in Wedgewood (in design review) and concerned restrictions in the existing zoning that have led the project to request five departures (especially related to the pedestrian zoning) will stymie the development process. Request the Final EIS study removal of Pedestrian-zone curb cut access restrictions so the project can move forward as of right.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
68	**Maxwell**	**Bayview Walker LLC/Prologis LP**
68-1	Support for Alternative 5. Bayview Walker currently owns vacant property at 2300 26th Ave S within the future North Rainier Urban Center (Request to rezone the property from Commercial 2 to Seattle Mixed to leverage the property's proximity to transit. Final EIS 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.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
69	**McCutcheon**	**IPB Properties Inc.**
69-1	IPB Properties owns the half-block located at 2700 1st Avenue in Belltown and is in the process of obtaining a MUP for mixed residential and retail redevelopment. Current zoning limits the height of the project to	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

Number	Comment Summary	Response
	145' which provides very little development capacity above the height at which "highrise" code requirements are triggered. Request to adjust heights and densities for residential projects in Belltown upward consistent with the City's rezoning actions throughout the rest of Downtown—suggested revisions to increase maximum height to 280', increase allowable average tower floorplate to 14,000 square feet, eliminate maximum lot coverage requirements, and increase non-residential FAR to 6.	
70	**McCullough**	**Graham Street Realty**
70-1	Graham Street Realty owns "Interbay Worklofts" at 1631 15th Ave W. City took steps to support and promote makers spaces (like the Interbay Worklofts) in the UI zone—request a similar approach is warranted for certain properties in the II zone (e.g., adding a live-work component to the II zone for smaller-scale existing buildings).	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
71	**Morrison**	**McCullough Hill PLLC**
71-1	Coalition of property owners around Stone Way and N 35th Street within the current Fremont Hub Urban Village. Properties are not within nor bordering an MIC. Support for creation of the Fremont Urban Center and rezone for neighborhood commercial use (instead of Industrial Commercial) consistent with Fremont Urban Center, Policy LU 13.11, and expected growth needs.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
72	**Norman**	**Individual**
72-1	Owns 3509-3513 Stone Way N within the current Fremont Hub Urban Village. Same content as Letter 71.	See Response to Comment 71.

Number	Comment Summary	Response
73	**Rohlfing**	**Individual**
73-1	Co-owner of property at 1102 North 34th Street in Fremont. Same content as Letter 71.	See Response to Comment 71.
74	**Roos**	**Hillis Clark Martin & Peterson Law Offices**
74-1	Congregation Beth Shalom owns five parcels at 6800 35th Avenue NE and 6830-6842 35th Avenue NE in Wedgwood which fall within a Frequent Transit Service Area. Request 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 FLUM use either the corridor designation or the neighborhood center designation as studied in the Draft EIS which better represent the current traits of the Congregation's properties and the clear existing trends of the neighborhood. Request the Final EIS consider possibility of NC1-40(M) zoning on Congregation's properties in the future to help enable prospective flexibility for the Congregation and City policymakers—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.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
75	**Selig**	**J. Selig Real Estate LLC**
75-1	JSRE owns two properties located on Market Street in Ballard and is in strong support of the proposed Ballard Regional Center designation. Encourage the City to study and adopt zoning at the 15th & Market intersection supporting densities of 320+ feet (like the U-District TOD zoning). The One Seattle Plan and Final EIS should	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

Number	Comment Summary	Response
	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, and up to 160 feet west of 24th Avenue along Market near the Nordic Museum. Final EIS should also study increased housing and jobs targets for the Ballard Regional Center so the City can fully analyze the benefits of TOD zoning, and encourage the City to expedite all subarea planning (and make this new Ballard Regional Center one of the first subarea plans to be completed).	
76	**Snow**	**Snow & Company Inc**
76-1	Snow & Company operate a boat repair business at 469 NW Bowdoin Pl, currently in an Industrial Land Use Classification and zoned MML U/65. 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. Recommend expanding one Industrial Zone policy to ensure viability of those businesses which rely on the shoreline (LU 13.2).	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
77	**Tobar**	**CIM Group**
77-1	Own One Convention Place and the Pine Street Garage. Urge City to pursue innovative land use strategies to foster a welcoming environment for employers, visitors, and residents, including implementation of a Downtown sign overlay. Support for Policy LU 4.11 with suggested revisions.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
78	**Warner**	**Balboa Retail Partners**
78-1	Balboa Retail Partners and BRFII Northgate owns property located at 830 NE Northgate Way which is	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required.

Number	Comment Summary	Response
	currently zoned Neighborhood Commercial 3 with a height limit of 55'. Support for Alternative 5 but request the Final EIS and Northgate Urban Center Subarea Plan study at least 85' heights on our property to address housing affordability and optimize larger sites like ours by removing unnecessary height constraints.	
79	**Wood**	**SBPS LLC**
79-1	SBPS owns 126,000 square feet at Sand Point and Princeton fronting Sand Point way NE between 47th and 50th Ave NE. Encourage the City to include neighborhood centers as a preferred alternative in the Final EIS and include Sandpoint/Princeton as a neighborhood center in the Final EIS and Final Plan.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
80	**Worthington**	**Lock Vista Apartments LLC**
80-1	Lock Vista Apartments owns apartments 3025 NW Market St in the western edge of the future Ballard Regional Center. Support the Mayor's vision for One Seattle and policies that will facilitate greater residential density and commercial vitality in Ballard, including the Ballard Regional Center designation, and urge the City to complete the applicable subarea plan as quickly as possible. Request the Final EIS study impact of allowing greater residential density with buildings up to 125' in height along the westernmost Market Street corridor (supported by ST3's BLE Ballard station).	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
81	**Smith 1**	**Urban Visions**
81-1	Urban Visions owns the site known as the S development property at 1045 and 1022 6th Ave S. The property is within the Greater Duwamish MIC and zoned II 85-240. Request to remove from the MIC and incorporate into the Downtown Regional Center. The II 85-240 zone is more akin to a	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

Number	Comment Summary	Response
	Downtown zone and is/will be supported by light rail (existing Union Station and possible future "CID South"). Current market conditions also indicated that office development may not be feasible in the area in the future but there is need for robust housing development (especially near regional transit).	
82	**Smith 2**	**Urban Visions**
82-1	Urban Visions is the development manager of properties at 318 5th Ave N and 516 Broad St in the Uptown neighborhood. Support for Alternative 5 but current zoning limits height of future development to 160' which does not support the kind of residential development that could be achieved in this center-city neighborhood. Request to adjust heights and densities in Uptown—suggested revisions to increase tower heights to 200' and podium heights to 85', increase the tower floorplate gross floor area to 75% of site are, and provide additional FAR.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.

4.2.2.5 Individuals

Individuals by Last Name (A – G)

Exhibit 4.2-5. Written Comments and Responses, 2024—Individuals (A – G)

Number	Comment Summary	Response
83	**Achanta**	
83-1	What is the Comp Plan's impact on Seattle's plants and animals?	See **Section 4.2.1.2** regarding response on impact to plants and animals.
83-2	Concern for lost urban forest. How will Seattle make progress toward its 30% tree canopy goal? How much public land is available?	See **Section 4.2.1.2** regarding response on impacts to tree canopy coverage and 30% tree canopy goal.
84	**Akalaitis 1**	
84-1	Concern for tree canopy. Where Seattle has planned for planting and maintenance of new trees. Is there a map and plan?	See the description of the City's recently amended tree code at the footnote[101], including a list of other tree canopy programs, and the City's urban forest management plan[102].
85	**Akalaitis 2**	
85-1	Concern for tree canopy. How will Seattle plant enough trees to make up for development? How is this measured and monitored?	See **Section 4.2.1.2** for Response to Letter 83 and Response to Letter 500 regarding the City's Tree Protection Ordinance.
86	**Alexander**	
86-1	Concern for housing increase, and lack of recognition to existing Covenants that says you cannot build a structure to impede views of Puget Sound in Sea-Lawn Acres Add of Broadview.	The City is not responsible for enforcing or mapping preexisting private covenants, easements, or deed restriction; however, the City is aware that some preexisting private covenants, easements, CC&Rs, and other deed restrictions may prevent developing to the maximum density allowed by proposed zoning controls even if not included in the various maps, Comprehensive Plan, or development regulations.
87	**Alfieri**	
87-1	Similar language to Letter 83, impact on plants and animals.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants and animals.
87-2	Similar language as Letter 83 about tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding tree canopy.
88	**Alspach**	
88-1	Support for Alternative 5. Study impacts of additional	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and

[101] See: https://buildingconnections.seattle.gov/2023/07/27/new-tree-protection-ordinance-goes-into-effect-on-july-30/#.
[102] See: https://www.seattle.gov/documents/Departments/UrbanForestryCommission/2021/2021docs/UrbanForestManagementPlanFinal.pdf.

Number	Comment Summary	Response
	neighborhood centers off of arterials, especially Green Lake neighborhood.	alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. The Preferred Alternative includes 30 neighborhood centers. See also **Section 4.2.1.3**.
89	**Amadon 1**	
89-1	Portion of Letter 92. Included sets of questions 1-6 including affordability, housing supply, middle housing rental supply, environmental impact of tree canopy loss. Same content as Letter 44.	See Responses to Comments 44-1 and 44-2 (also Comments 92-1 through 92-6 below).
90	**Amadon 2**	
90-1	Portion of Letter 92. Included sets of questions 7-14 including affordability, housing supply, middle housing rental supply, environmental impact of tree canopy loss. Same content as Letter 44.	See Responses to Comments 44-2 through 44-8 (also Comments 92-7 through 92-14 below).
91	**Amadon 3**	
91-1	Portion of Letter 92. Included sets of questions 15-19 including affordability, housing supply, middle housing rental supply, environmental impact of tree canopy loss. Same content as Letter 44.	See Responses to Comments 92-15 through 92-19 below and Letter 44-9 (also Comments 92-18 below).
92	**Amadon 4**	
92-1	Where is the definition of affordability that is used in the Draft EIS?	See Response to Comment 44-1.
92-2	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?	See Response to Comment 44-1.
92-3	In the Draft EIS 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	See Response to Comment 44-2.

Number	Comment Summary	Response
	that this dependence on supply-side, trickle-down housing works?	
92-4	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?	See Response to Comment 44-2.
92-5	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 Draft EIS acknowledge this?	See Response to Comment 44-2.
92-6	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?	See Response to Comment 44-2.
92-7	Can duplexes, triplexes, fourplexes, sixplexes, stacked flats and courtyard apartments be developed in Urban Residential areas given lack of economies of scale?	See Response to Comment 44-2.
92-8	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?	See Response to Comment 44-3 and **Section 4.2.1.2** regarding tree canopy.
92-9	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?	See Response to Comment 44-3 and **Section 4.2.1.2** regarding tree canopy.
92-10	Where does the Plan acknowledge that supply-side trickle-down housing takes 30-40 years to age into natural affordability?	See Responses to Comment 44-2 and 44-4.
92-11	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?	See Responses to Comments 44-2 and 44-5.

Number	Comment Summary	Response
92-12	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?	See Response to Comment 44-6.
92-13	What zoning tools are available, including MHA, to require more family-sized 3-bedroom rental housing at all income levels?	See Response to Comment 44-7.
92-14	Where does the housing plan acknowledge the needs of seniors and people with disabilities for accessible housing without stairs?	See Response to Comment 44-8.
92-15	Shouldn't courtyard apartments be an option, especially where "protected" tree occupy the center of a parcel? How can they be incentivized.	Comment noted. The proposed revisions to the Neighborhood Residential zone allows all middle housing types provided for in HB 1110, including courtyard apartments.]
92-16	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?	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See Response to Comment 44-8.
92-17	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?	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
92-18	What is the effect of lacking 11,000 blocks of sidewalks on our vision of a 15-minute city?	See Response to Comment 44-9.
92-19	Where does the Draft EIS 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?	See **Section 3.8.3** Mitigation Measures under Tenant Protections for current policies. The action alternatives do not propose changes to anti-eviction policies, and therefore the EIS does not analyze impacts of such policies on rental housing development. However, the Proposed Plan describes measures to prevent displacement in the Housing Element including stabilizing communities, increasing community ownership, and redressing past discrimination and exclusion, particularly for Black and Indigenous communities.

Number	Comment Summary	Response
93	**Anderson**	
93-1	Similar content to Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
94	**Avron**	
94-1	Advocate for bolder alternatives, all five alternatives fail to meet the moment to address the housing crisis.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.1** regarding the affordable housing evaluation and **Section 4.2.1.3** regarding studied growth.
95	**Barcklow**	
95-1	Concern around impact of tree loss and specific recommendations to mitigate.	See **Section 4.2.1.2** regarding response on impacts of tree loss—including retaining existing 6" DSH and larger trees, probable scale of impact of tree loss, and time frame for mitigation—as well as discussion of proposed additional mitigation recommendations.
96	**Barker**	
96-1	Similar content as Letter 44 and 89-92. Seventeen sets of questions including affordability, housing supply, middle housing rental supply, environmental impact of tree canopy loss. Where is the definition of affordability? The HB 1110 definition should be used. What is the likelihood that this plan will result in affordable low-income housing provided by the market? Need for programs or zoning incentives for urban residential neighborhoods? How many low-income affordable rentals will be built under Alternative 5?	See Responses to Comments 92-1 through 92-17.
97	**Barrett**	
97-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for Response to Comment 95 and similar regarding tree canopy.
98	**Bartanen**	
98-1	Must include conservation of urban and non-urban species and strong tree protections.	See **Section 4.2.1.2** regarding tree canopy.
99	**Barton**	
99-1	Similar content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for Response to Comment 95 and similar regarding tree canopy.

Number	Comment Summary	Response
100	**Baskin 1**	
100-1	Questions and concerns around tree canopy.	See **Section 4.2.1.2** regarding tree canopy.
101	**Baskin 2**	
101-1	Concerns and recommendations regarding tree canopy, some overlap with Letter 95.	Analyses in **Section 3.3** of the EIS identify the environmental benefits of trees and evaluate the potential impacts of the alternatives on tree canopy. As demonstrated in those analyses, the goals of increasing housing and increasing tree canopy are not mutually exclusive. See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy. Suggestions for policy changes are noted and are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
102	**Baskin 3**	
102-1	Concerns around loss of tree due to impact from development.	See **Section 4.2.1.2** regarding tree canopy.
103	**Bassage**	
103-1	Support for Alternative 5 and the Corridors concept and recommend it be applied on Rainier Avenue S. Own property at 4822 S Holly Street currently zoned NR3—request rezoning to LR3 or higher (as part of extending multifamily zoning along Rainer Ave).	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
104	**Bastian, Elizabeth**	
104-1	Support for Alternative 6, and disappointment in current Draft Plan as it will worsen the many crises. Plan should allow for high-rise apartments.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
105	**Beauregard**	
105-1	List of concerns around the increase in small apartments and townhouses, and decrease of single family homes.	The Preferred Alternative supports a variety of housing types (including middle housing consistent with HB 1110) that will support housing affordable to all economic segments of the population in Seattle. See also **Section 4.2.1.2** regarding tree canopy. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
106	**Beauregard**	
106-1	Ban or severely restrict AirBnBs and VRBOs.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and

Number	Comment Summary	Response
		alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
107	**Beffa**	
107-1	Similar content to Letter 83 regarding tree canopy. Three references to policies and questions around impact of the Plan on plants and animals, public land availability and how many trees will need to be planted to make up for trees removed by development.	See also **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
108	**Bendich, Arnold**	
108-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
109	**Bendich, Judith**	
109-1	Need for housing for all economic segments. Skepticism of OPCD's proposals and projects, and request for new evidenced-based information in compliance with state law. Need to preserve historic resources and mitigation	This is a non-project EIS that analyzes the proposal and alternatives broadly across the study area consistent with WAC 197-11-442, including impacts to housing and historic resources. See **Section 3.9 Cultural Resources** of this EIS. See also **Section 4.2.1.1** regarding the affordable housing evaluation.
109-2	The need to preserve tree canopy and recommendation on how to reach 47% tree canopy.	See **Section 4.2.1.2** regarding tree canopy.
110	**Berg**	
110-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
111	**Berkley, Brennen 1**	
111-1	Bolder options than alternative 5 suggest. Increase housing projections beyond 120,000.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. The Preferred Alternative considers 120,000 housing units. See **Section 4.2.1.3** regarding studied growth. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
112	**Berkley, Brennen 2**	
112-1	Proposed EIS does not address existing harms or mitigation strategies caused by cars, such as hundreds of deaths and injuries. Explore more aggressive options for making streets safer such as pedestrian only streets, traffic	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. The potential safety impacts of the alternatives are described in **Section 3.10.2** Impacts of the Final EIS; the programs and strategies the City may use to improve safety are described in **Section 3.10.3 Mitigation Measures** of the Final EIS.

Number	Comment Summary	Response
	calming, narrowing or removing car lanes, speed cameras.	
113	**Berkley, Scott 1**	
113-1	Request to study 6 unit stacked flats in all neighborhoods, 4 story 12 unit apartments in all neighborhoods on lots of at least 4,000 sf, 40 story high rise mixed use apartment in all areas within 0.5 miles of light rail/ rapid transit.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. See also **Section 4.2.1.3** regarding changes to zoning standards in centers, including near transit. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
114	**Berkley, Scott 2**	
114-1	List of recommended changes including but not limited to expand all urban centers and regional centers, expand radius of neighborhood centers, increase FAR, etc.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. See **Section 4.2.1.3** regarding changes to zoning standards in centers and additional and/or expanded neighborhood centers. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
115	**Berliner**	
115-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
116	**Best**	
116-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
117	**Bhagwandin, Eva 1**	
117-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
118	**Bhagwandin, Eva 2**	
118-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
119	**Bhagwandin, Khai**	
119-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
120	**Bhagwandin, Samuel**	
120-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
121	**Bickel**	
121-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.

Number	Comment Summary	Response
122	**Bicknell**	
122-1	Pass legislation that encourages more trees. Developers cut down mature trees that could remain if a building were redesigned.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers
123	**Bledsoe 1**	
123-1	Study impact of the 5 options on the plants and animals. Series of questions, concerns and recommendations on tree canopy.	See **Section 3.3 Plants & Animals** and **Section 4.2.1.2** for response to Letter 500.
124	**Bledsoe 2**	
124-1	Similar content to Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
125	**BlueSpruce**	
125-1	Support for Alternative 2 as it would have the least impact on tree canopy. Includes similar content Letter 83 regarding plants, animals, and tree canopy.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
126	**Blumenthal**	
126-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
127	**Bonjukian**	
127-1	Allow more housing in Seattle. Increase neighborhood centers, allow multifamily housing close to all major parks, Urban centers should be allowed to build fully mid-rise buildings of up to 8 stories.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, additional and/or expanded neighborhood centers, capacity near parks, and parking minimums.
127-2	Request to follow the guidance of Department of Commerce's Middle Housing Model Ordinance.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. The Preferred Alternative includes zoning revisions that are consistent with state guidance to support increased housing typologies affordable to all economic segments of the population.
128	**Booze**	
128-1	Seattle needs a bold housing plan to create a vibrant livable 15	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and

Number	Comment Summary	Response
	minute city with abundant housing. Includes six recommendations to achieve this goal.	alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, additional and/or expanded neighborhood centers, corner stores, and parking minimums.
129	**Bos**	
129-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
130	**Brady**	
130-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
131	**Brandt**	
131-1	Similar content as Letter 83 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding tree canopy.
132	**Brod**	
132-1	Comments on disconnect between housing unit need identified in the Draft Plan Housing Appendix and units studied in the Draft EIS. Developers need flexibility to build a wide variety of housing types to meet the needs of all types of households.	Comments noted. The One Seattle Plan identifies 80,000 housing units in relation to regionally adopted housing targets; however, the Preferred Alternative studies growth of 120,000 housing units. See also **Section 4.2.1.3** regarding changes to zoning standards in centers. Please also see the Housing Element and Housing Appendix in the Proposed Plan.
132-2	Request for Final EIS to study more neighborhood centers, to increase the boundary/walkshed to at least 0.25 walkshed, and the potential for more housing capacity within 0.25-mile and 0.5-mile walksheds. Request Final EIS include more analysis on which alternative would lead to creation of the most family-sized (2+ bedroom units) and to the most displacement of low and middle income households (less than 30% and 50% AMI, respectively). Request Final EIS included more analysis 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.	**Neighborhood Centers:** Comments noted and forwarded to City decision makers. See **Section 4.2.1.3** regarding additional and/or expanded neighborhood centers. **Family-sized units:** **Exhibit 3.8-41** shows projected net new housing units by housing type and size. While there is no way to predict the number of bedrooms in future housing supply, larger attached and detached housing (>1,200 sq. ft.) are the formats most likely to include 2+ bedrooms. **Displacement:** **Exhibit 3.8-48** shows projected housing units lost to demolition by affordability level. While data about the income level and tenure of households occupying these units, housing affordable to low- and middle-income households are more likely to be occupied by low- and middle-income households than are more expensive units. **Height limits:** The EIS considers height limits when determining the capacity of each parcel for new housing development as well as the likelihood that parcels would be redeveloped under each alternative. **Exhibit 3.8-41** summarizes findings in terms of housing unit production by housing type. **Exhibit 3.8-49** projects the number of new affordable housing units produced by MHA and MFTE associated with each alternative.

Number	Comment Summary	Response
132-3	Seen overwhelmingly positive impacts of change and growth in own neighborhood (Roosevelt/Ravenna) and would like to see these kinds of changes spread across the city, which requires adding more housing capacity.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
133	**Broderick**	
133-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
134	**Brooking**	
134-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
135	**Broska**	
135-1	Alternative 5 should be modified with higher growth targets to accommodate for the housing crisis. Study granting tax breaks and fee deferrals to housing projects that include affordable units to help increase housing.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding studied growth.
136	**Bruan-Kelly 1**	
136-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
137	**Bruan-Kelly 2**	
137-1	Concern around mass building of homes with little attention paid to the environment, specifically trees.	Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also **Section 4.2.1.2** for responses to comments on trees.
138	**Brunton**	
138-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
139	**Burrill**	
139-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
140	**Bushue**	
140-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.

Number	Comment Summary	Response
141	**Byrd**	
141-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
142	**C, Nancy**	
142-1	Concern that the Comp Plan does not seem to consider nature, value of trees, and especially mature trees.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also **Section 4.2.1.2** regarding tree canopy.
143	**Candiotti**	
143-1	Support Alternative 2 or 4. Similar content as Letter 83 regarding plants, animals, and tree canopy.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
144	**Cannon**	
144-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
145	**Cantrell**	
145-1	Need more housing, and increase "urban villages." Alternative 5 is the minimum we should be considering and welcome an even bolder plan.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding studied growth.
146	**Carre**	
146-1	Do not support rezone of 130th Station. Against urban villages and lukewarm to the idea of neighborhood anchors.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required.
147	**Carter**	
147-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
148	**Catena**	
148-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
149	**Cave**	
149-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.

Number	Comment Summary	Response
150	**Chadsey**	
150-1	Similar content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
151	**Chadsey**	
151-1	Similar content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
152	**Charbonneau**	
152-1	The Seattle plan is extremely wordy, full of vague details, maps are not detailed enough, and extremely hard to digest. Follow the state bill and abandon the comprehensive plan.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
153	**Chavez**	
153-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
154	**Chernyshev**	
154-1	The City did not listen to the overwhelming majority's call for an Alternative 6 vision, which would lower the cost of housing.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding studied growth.
155	**Church**	
155-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
156	**Clabough**	
156-1	We are missing middle zoning; we need more middle housing. I encourage more mixed commercial and residential.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives, so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. The Preferred Alternative includes expanded opportunities for a variety of housing typologies (including middle housing) as well as mixed use development.
157	**Clark, Lisa 1**	
157-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
158	**Clark, Lisa 2**	
158-1	Same content as Letter 95, regarding tree canopy	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.

Number	Comment Summary	Response
159	**Clark, Dave**	
159-1	Concern around lack of detailed mathematical and technical analysis concerning the impacts of adding 100,000 new housing units to the City with precious and limited natural landscape. There should be a better analysis regarding impacts on landscape and trees as an amendment.	Please see **Section 4.2.1.2** for responses to comments in Letters 83 and 95, concerning the process for identifying significant adverse impacts. Also see **Section 4.2.1.2** for responses to comments in Letter 500 and similar, concerning implementation of and the effectiveness of the City's Tree Protection Ordinance. Analyses in the EIS are consistent with SEPA requirements for programmatic, non-project reviews, per WAC 197-11-442.
160	**Clifton**	
160-1	Same content as Letter 95, regarding tree canopy	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
161	**Close 1**	
161-1	Six sets of study recommendations including impacts of higher floor area ratios, how and where to place social housing, eliminate parking minimums, etc.	See **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, and parking minimums. See also **Section 4.2.1.2** regarding tree canopy.
162	**Close 2**	
162-1	Study impacts of 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 minimums required.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. **Section 3.6.3** includes "incentives for ground floor open space" as a potential mitigation measure.
163	**Cohen-Lewe, Ashley**	
163-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
164	**Cohen, Lori**	
164-1	Acknowledge the historical and natural resources in the draft comprehensive plan and Draft EIS.	See EIS Section 3.9 for an evaluation of impacts to cultural and historic resources including mitigation.
164-2	Concern on the Roosevelt Urban Center zone being inconsistent with Land Use Policy 2.9. Specific land use policy additions suggested to recognize and plan for the role and character of different neighborhoods.	Comment noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
164-3	Concern on displacement in zone RCN NHD.	The potential for demolition and replacement of existing housing under each alternative is analyzed in the EIS.

Number	Comment Summary	Response
		Comments regarding policies to protect historic housing are noted. Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See also **Section 4.2.1.1** regarding the affordable housing evaluation.
164-4	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
165	**Colledge**	
165-1	Similar content as Letter 95, regarding tree canopy	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
166	**Cramer**	
166-1	Support for higher density in the Roosevelt South MR Zone. This location is the perfect transition zone candidate for MR (6 story apartment building) zoning and it is close to existing tall infrastructure, a freeway, Light rail station and other transit lines.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See response to Comment 54-1.
167	**Crocker**	
167-1	Concern about the success of the 30% tree canopy goal. How have you been able to calculate the recovery of lost tree canopy? How much public land space do you have for increasing tree canopy, and who will take care of all the new trees?	See **Section 4.2.1.2** for responses regarding tree canopy and the effectiveness of the City's Tree Protection Ordinance.
168	**Crocker**	
168-1	Same content as Letter 95, regarding tree canopy	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
169	**Crockett**	
169-1	Concerns around tree canopy, and support for Alternative 2 as it allows for population and job growth with the least negative impact on tree canopy and biodiversity. Support for Birds Connect Seattle message and attached email from Friends of Seattle's Urban Forest.	Comments noted and forwarded to City decision makers. See responses to Comments 20-1 through 20-6 from Birds Connect Seattle. See **Section 4.2.1.2** for responses to comments from Friends of Seattle's Urban Forest. Please note that the City of Seattle continues to have a goal of achieving 30% tree canopy cover by 2037.

Number	Comment Summary	Response
170	**Cunningham Adams**	
170-1	Study the impact of higher FARs for middle housing, how and where to place social housing projects in every neighborhood, eliminating parking minimums citywide, and allowing bolder height and density bonuses within ¼-mile of transit.	See **Section 4.2.1.3** regarding changes to zoning standards and parking minimums and **Section 4.2.1.1** regarding the affordable housing evaluation.
171	**Cushman-Macey**	
171-1	Disappointment that over 60% of people wanted Alternative 5 or more. Terrible shame that you are listening to wealthy minority instead of the experts and the public.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
172	**Dack**	
172-1	Similar content as Letter 83, regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
173	**Dahl**	
173-1	Support for the Housing Abundance Map, and request to build more housing and more affordable housing. Current plans falls short of housing needs.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. See also **Section 4.2.1.2** regarding studied growth and additional and/or expanded neighborhood centers. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
174	**Daniel**	
174-1	Widespread support for more dense housing near 133rd and 1st Ave area and especially support for the Haller Lake United Methodist Church property. Request that the Draft EIS be revised to include NC2-55 zoning for the church property, Lots 3, 4 and 5, of blocks 65, in the HE Orr Park Division No. 6 so that a development might be considered that includes both commercial and residential components.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
175	**Daniels**	
175-1	Advocating for more housing, as the current plan is lacking, and a list of reasons to address common criticisms including displacement,	Comments noted and forwarded to City decision makers. See also **Section 4.2.1.3** regarding studied growth and additional and/or expanded neighborhood centers.

Number	Comment Summary	Response
	character of the neighborhood, traffic, and benefits.	
176	**Danner**	
176-1	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.	The Seattle Transportation Plan includes a Freight and Urban Goods Movement Element. The Freight and Urban Goods Element provides information specific to the planning, design, construction, maintenance, and operation of the transportation network. The STP and the Freight and Urban Goods Movement Element builds on and supersedes the 2016 Freight Master Plan (FMP). All transportation modes, vehicle types, and facilities used in goods movement are considered in the Freight Element, with a focus on truck transport and portions of the transportation network used to access maritime, manufacturing, and industrial centers (MICs) and connections to the regional freight system.
177	**Davis Deborah**	
177-1	Similar content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
178	**Davis Courtney**	
178-1	Similar content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
179	**Devi**	
179-1	Similar content as Letter 83, regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
180	**Diaz**	
180-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
181	**Dickerson**	
181-1	Concern for tree canopy. What is the plan for encouraging the growth of large trees, is there a plan to build the tree canopy in Seattle?	See **Section 4.2.1.2** for responses regarding tree canopy.
182	**Dolan**	
182-1	Similar content to Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
183	**Doran**	
183-1	Similar content as Letter 83, regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.

Number	Comment Summary	Response
184	**Downward**	
184-1	Three suggestions on the climate and sustainability element regarding language, tree canopy and adding a fish and wildlife conservation policy.	Comment noted. This comment is beyond the scope of environmental review of the One Seattle Plan so no response is necessary. and forwarded to City decision makers. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
185	**Du Mas, Haisten, Siegert, Talbot, Jessup, Costello, Ji, and Chen**	
185-1	Owners of 415, 421, 425 and 431 16th Avenue E. Request an upzone to better match adjoining blocks, and additional EIS analysis and text revision to the Code and the Plan that would provide continued flexibility.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
185-2	Requested policy changes and related implementing regulations.	Suggestions for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
185-3	Final EIS should study the addition to the easterly block of 16th Avenue E between E Republican Street and E Harrison Street, to the adjoining urban center. Suggested revisions to the Final EIS to more clearly acknowledge residential neighborhoods directly adjacent to centers.	The subject block is included in the Capitol Urban Center in the Proposed Plan and is analyzed in the EIS as part of the Preferred Alternative.
186	**Duggan**	
186-1	Support the combined plan but it does not go far enough, advocate for more homes. Would like to see more smaller-scale commercial accessible from neighborhoods and near transit centers, as well as more childcare and locations for child care in the neighborhoods.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
187	**Dunn**	
187-1	Support for Alternative 5 and additional height and density studied in small parcels zoned NC-55 to encourage development and create workable Mandatory Housing Affordability program. List of negative impacts of MHA formula including but not limited to diminished existing value of sites and made any new units that	See response to Comment 55-1.

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	could developed under MHA more expensive. Suggested multi-part revisions to NC-55 sites.	
188	**Durslag 1**	
188-1	Setback requirements for multifamily development on arterials do not allow adequate space for both pedestrian access and substantial tree canopy to mitigate noise, air and particulate pollution, and heat island effects.	See also **Section 4.2.1.2** regarding tree canopy. Space for tree canopy is largely determined by the Seattle Right-of-Way Improvements Manual, which determines the minimum right-of-way and landscape strip (for street trees) widths. In addition, LR zones would continue to require a Green Factor score of .60 or higher, which is achieved through plantings and landscape features. A private developer may choose to bolster tree canopy by planting trees in the setback on private property. The Preferred Alternative does propose slightly increasing the setback requirements in LR zones. Currently, rowhouses and apartments in LR zones must be setback a minimum of 5 feet. The proposed zoning would require an average front setback of 7 feet and minimum of 5 feet for all housing types. The 2 additional average feet may be used to accommodate plantings, especially if clustered to provide ample space for tree roots away from buildings' foundations.
188-2	What is the supporting data and research behind the Draft EIS assertion that "No significant unavoidable adverse impacts to air quality and greenhouse gas emissions are anticipated."	See Final EIS **Section 3.2.2** regarding air quality and GHG impacts and **Section 3.2.3** regarding mitigation.
188-3	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?	See Response to Comment 44-9.
188-4	What plans does the City have to add parks in areas with heavy concentration of 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?	See **Section 4.2.1.2** regarding tree canopy and **Section 4.2.1.3** regarding housing and provision of parks and open space.
188-5	When no parking is provided for private automobiles in order to encourage use of public transportation, grocery stores	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision

Number	Comment Summary	Response
	must be within walkable distance from population centers. 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?	makers. Grocery stores are permitted within neighborhood centers, urban centers, regional centers and in commercially zoned Urban Residential areas.
188-6	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?	Population, race and ethnicity, and household size are discussed in Final EIS **Section 3.8** (e.g., see Final EIS **Exhibit 3.8-6** for households by tenure and size and Final EIS **Exhibit 3.8-41** for projected net new housing units by type and alternative). See also response to Comment 44-6.
188-7	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 bus lines? How will this transportation and overall land use allow daycares to afford rent in sufficient areas of the city to meet the need?	The Final EIS describes the future assumptions for the transit network which will include Link light rail service extensions, new Metro RapidRide service, and local Metro bus routes. Metro regularly adjusts its service to adjust to evolving demand and would continue to do so. In addition, Metro offers an on-demand transit option (Metro Flex) in areas of the City that are not served by nearby fixed-route service. Final EIS **Section 3.8** also considers employment by alternative, including job growth in neighborhood centers and corridors which have the potential to provide more neighborhood-serving businesses and services (including child care facilities) in areas of the city that currently have few options. In addition, child care centers are currently allowed in numerous zones throughout the city, including residential, mixed use, and commercial zones.
188-8	To what extent will Seattle's future housing be stair-free and suitable for seniors?	See response to Comment 44-8.
188-9	Similar set of questions and concerns as Letter 83, Letter 95, and Letter 500 regarding impacts to plants, animals, and tree canopy, as well as the effectiveness of the City's Tree Protection Ordinance. Concern about impacts, including	See **Section 4.2.1.2** for responses to comments in Letter 83, Letter 95, and Letter 500 (and similar letters) regarding plants, animals, and tree canopy. The potential impacts of the alternatives (including varying degrees of development and redevelopment projects that would be expected to occur) on

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	heat island effects, of development on plants and animals within the Seattle city limits.	plants and animals are described and evaluated in **Section 3.3.2** of the EIS. Those analyses also address heat island effects.
188-10	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?	See Final EIS **Section 3.12.2** regarding impacts to utilities, including stormwater, under each of the alternatives.
189	**Durslag 2**	
189-1	Recommendations for revisions to the text of the Draft Plan.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
190	**Dwyer**	
190-1	Support Alternative 5. Study impacts of expanded high-rise zoning in urban and residential neighborhoods.	Comments noted and forwarded to City decisions makers. See also **Section 4.2.1.3** regarding changes to zoning standards in centers.
191	**Edlund**	
191-1	Support for either Alternative 2 or 4. Similar content as Letter 83, regarding tree canopy, with additional questions about specific statements.	Comments noted and forwarded to City decisions makers. See **Section 4.2.1.2** for response to Comment 83 and similar regarding tree canopy.
192	**Eldridge**	
192-1	Variation of Letter 83 regarding plants, animals, and tree canopy with additional questions around tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding tree canopy. Also see **Section 4.2.1.2** for responses to comments in Letter 500 and similar regarding concerns about the effectiveness of City's Tree Protection Ordinance.
193	**Eliason**	
193-1	The plan does not do enough to redress the harm and poor outcomes stemming from Seattle's racist and classist land use regulations.	Each section of the Final EIS impacts analysis includes a discussion of equity and climate related impacts including inequities related to race/ethnicity and household income. For example, the Final EIS acknowledges that housing policy and zoning laws have a history of causing harm to Black, Indigenous, and People of Color in Seattle—EIS **Section 3.6.2** evaluates land use patterns proposed under each alternative and potential resulting compatibility conflicts for their likelihood to intensify or lessen these historical inequities. See also Response to Comment 92-19 addressing housing policies and redressing past discrimination and exclusion.

Number	Comment Summary	Response
193-2	The plan does not do enough to address broad housing affordability crises in the city. Only Alternative 5 maximizes the number of affordable homes.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.1** regarding the affordable housing evaluation.
193-3	The plan does not center climate adaptation in the middle of a worsening climate crisis	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. EIS **Sections 3.2.2** and **3.5.2** consider air quality and noise impacts, respectively, including exposure to air and noise pollution. See Response to Comment 5-3 regarding high-volume traffic roadways beyond freeways.
193-4	The plan is not coordinated with the Seattle transportation plan and levy, nor commits to a transformative turnaround in any timeline that matters.	See Response to Comment 5-6.
194	**Ellison**	
194-1	Variation of the content in Letter 95, regarding tree canopy with additional questions and concern.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
195	**Engstrom**	
195-1	A course or information on how to navigate all the documents and how they all connect with others would be helpful.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. The city continuously looks for opportunities to increase transparency in its documents and their relationship to proposed actions.
195-2	Concern for retention of trees and eliminating heritage trees through the new tree policy. Questions about how this plan affects trees in School Districts when making changes on school property.	See the City's summary of changes of the new ordinance in July 2023: All heritage trees designated by the City's heritage tree program (now called Tier 1 trees) must be retained unless hazardous, and new development in Neighborhood Residential zones require trees be planted along the sidewalk in the right of way.[103] Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers.
196	**Estrada**	
196-1	Same content as Letter 95, regarding tree canopy	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.

[103] See: https://buildingconnections.seattle.gov/2023/07/27/new-tree-protection-ordinance-goes-into-effect-on-july-30/#.

Number	Comment Summary	Response
197	**Exit**	
197-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
198	**Fahrenbruch**	
198-1	Similar content as Letter 95, regarding tree canopy	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
199	**Faste**	
199-1	Same content as Letter 95, regarding tree canopy	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
200	**Fayyad**	
200-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
201	**Faz**	
201-1	Study Alternative 6 that residents demanded in 2022 scoping. We cannot continue with the status quo of low housing stock, decreasing housing affordability, and minimal varieties of housing. Ensure bulking of regulations such as FAR, lot coverage, parking minimums be lifted on every residential lot in the city.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, and neighborhood centers.
202	**Fellows**	
202-1	This 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.	The No Action Alternative does not include implementation of HB 1110. The action alternatives include revisions to the Comprehensive Plan to implement changes required by HB 1110, including promoting more middle housing.
203	**Fernandes**	
203-1	Questions regarding tree canopy such as what the impact of the Plan is on non-human life, how to ensure existing forests are not destroyed, provide a map of public land where you plan to reforest.	See **Section 4.2.1.2** for responses regarding tree canopy and implementation of the City's Tree Protection Ordinance.
204	**Fertal**	
204-1	Same content as Letter 95, regarding tree canopy	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.

Number	Comment Summary	Response
205	**Field**	
205-1	Same content as Letter 95, regarding tree canopy	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
206	**Filipovic**	
206-1	Similar content as Letter 83, regarding tree canopy, with additional questions on specifics of increasing trees using city owned property, how many trees must be planted in those areas to replace those that are lost in the private sector.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding tree canopy.
207	**Foltz**	
207-1	Proposed alternative does not address future housing needs. The current alternative falls well short of the need for affordable housing. Request 4 analysis of increasing new homes, expands neighborhood center designation, permits small apartments and quadplexes in formerly single family only neighborhoods.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding changes to zoning standards in centers and additional and/or expanded neighborhood centers and **Section 4.2.1.1** regarding the affordable housing evaluation.
208	**Ford**	
208-1	Support for Alternative 5. Suggest studying impacts of additional neighborhood centers in urban neighborhoods, as well as greater height and density bonuses within a half mile of transit.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding changes to zoning standards in centers and additional and/or expanded neighborhood centers.
209	**Franco**	
209-1	Same content as Letter 95, regarding tree canopy	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
210	**Freidberg**	
210-1	Similar content as Letter 95, regarding tree canopy	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
211	**Friedmann**	
211-1	List of 4 proposed changes; include the Seward Park Neighborhood Center as studied Draft EIS Alternative 5, implement Corridor designation in the streets surrounding Seward park, raise FAR and eliminate parking mandates.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding changes to zoning standards in centers, additional and/or expanded neighborhood centers, and parking minimums.

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212	**Fristoe**	
212-1	Same content as Letter 95, regarding tree canopy	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
213	**Gadeken**	
213-1	The city should enact Alternative 6 or improve the Plan by allowing bigger buildings, add more neighborhood centers, zone for fourplexes and sixplexes, embrace transit-oriented development, remove parking requirements, flexibility to increase corner stores.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding changes to zoning standards in centers, additional and/or expanded neighborhood centers, and parking minimums.
214	**Gaul**	
214-1	Expanded version of letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
215	**Ghiorso**	
215-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
216	**Gillenwater 1**	
216-1	The City did not listen to the overwhelming majority's call for an Alternative 6 vision. To create a more affordable city, the Plan should allow much more housing to be built away from noisy, polluted arterials. Think the Plan should expand the upzone walk shed around high frequency transit to at least ½-mile in Ballard in particular.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding studied growth.
217	**Gillenwater 2**	
217-1	The City did not listen to the overwhelming majority's call for an Alternative 6 vision. Instead the current plan will worsen congestion and pollution by forcing more people into long commutes. Apply Vision Zero best practices in North Seattle in particular on roadways like Aurora Ave.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding studied growth and Final EIS Sections 3.2 and 3.10 regarding air quality, GHG emissions, and transportation impacts.
218	**Gillenwater 3**	
218-1	The City did not listen to the overwhelming majority's call for an Alternative 6 vision. To create a more equitable sustainable city,	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision

Number	Comment Summary	Response
	the Plan should allow for corner stores in many more places. Look into zoning and other changes to the Shilshole marina area in Ballard to allow a more vibrant and walkable mixed use area given its access to Golden Gardens.	makers. See **Section 4.2.1.3** regarding studied growth and capacity near parks.
219	**Gillenwater 4**	
219-1	Challenge flawed analysis presented in the summarized impact of the five alternatives with respect to greenhouse gas emissions (Draft EIS Exhibit 1.6-30). Acknowledge the flaws and apply a proper impact analysis methodology that Alternative 5 would be highly likely to result in greater overall avoided GHG emissions.	Regional GHG analysis is available through the VISION 2050 SEIS[104] and the King County GHG analysis conducted in 2022 and recently under HB 1181. Please note the central Puget Sound including Seattle are not required to respond to HB 1181 until 2029. The EIS does compare the alternatives relative to the City's plans in **Section 3.2 Air Quality & GHG Emissions**. By planning for growth consistent with the VISION 2050 Regional Growth Strategy the City is fitting into the regional evaluation. Planning for growth in the city especially in areas associated with existing and planned transit helps provide a growth pattern that can reduce GHG emissions particularly on a per capita basis as recognized in RCW 36.70A.070 and HB 1181.
220	**Gingerich**	
220-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
221	**Gloger**	
221-1	Suggest Alternative 2 be further examined and modified. Concern about loss of trees in Seattle, with a list of expanded questions similar to Letter 95 and Letter 83.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. The impacts of the Preferred Alternative on plants and animals are evaluated in **Section 3.3.2** of the Final EIS. See also **Section 4.2.1.2** for responses to comments in Letter 500 and similar, concerning implementation of and the effectiveness of the City's Tree Protection Ordinance.
222	**Godfrey 1**	
222-1	More study is needed if our most vulnerable endangered wildlife, the Southern Resident Killer Whales were excluded. Concern and questions regarding tree canopy.	See Response to Comment 20-6 regarding fish and wildlife and tree retention.

[104] See VISION 2050 SEIS at https://www.psrc.org/planning-2050/vision-2050/environmental-review and PSRC Air Quality Analysis https://www.psrc.org/media/1803 updated every six years. See also Puget Sound Regional Emissions Analysis Project, King County, 2022 https://kingcounty.gov/en/dept/executive/governance-leadership/climate-office/focus-areas/greenhouse-gas-emissions. Commerce funded 11 county GHG analysis including for King County. Results will inform the County and all cities including Seattle: https://www.commerce.wa.gov/growth-management/climate-planning/.

Number	Comment Summary	Response
223	**Godfrey 2**	
223-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
224	**Godon**	
224-1	The plan needs to much further in allowing more housing options in more of the city. We need the Plan to align with state law and allow sixplexes throughout the city and middle housing in many more areas.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding studied growth and **Section 4.2.1.1** regarding the affordable housing evaluation.
225	**Grant, Andrew**	
225-1	List of 30 general comments and requests for further analysis and information including extending and revising various center boundaries. Questions about content in Chapter 1. Study the elimination of all parking requirements in the Final EIS.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding parking minimums.
225-2	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.	See **Section 4.2.1.1** regarding the affordable housing evaluation
225-3	Comments and requests for further analysis and information including extending/revising various center boundaries and specific questions about content in Chapter 1.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.1** regarding the affordable housing evaluation. See **Section 4.2.1.2** regarding plants, animals, and tree canopy. See **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, additional and/or expanded neighborhood centers, capacity near parks, and parking minimums.
225-4	Suggested revisions to Chapter 2 and studied alternatives.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding studied growth, Final EIS **Chapter 2** for a description of the Preferred Alternative, and Final EIS **Chapter 3** for an evaluation of the Preferred Alternative.

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225-5	Requests for additional analysis in Section 3.1 Earth & Water Quality. Request for specific mitigation strategies for areas that will see a significant sea level rise by 2100 and to increase density in areas with a low burden level in Exhibit 3.1-12.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See Final EIS **Section 3.1.3** for mitigation strategies which includes reference to the Climate Element a new chapter of the City's Plan. Area 7 has the greatest exposure to sea level rise per **Exhibit 3.1-11** and has the lowest residential growth of the studied alternatives. See **Exhibit 1.4-9**.
225-6	Requests for additional analysis and clarifications in Section 3.2 Air Quality & GHG Emissions.	In the Final EIS the following is addressed: ▪ Dwelling units within 200 meters of high travelled roads the Preferred Alternative is evaluated similar to other alternatives, see **Exhibit 3.2-18**. A description of existing and potential mitigation measures to address air quality and sensitive uses including housing is included in **Section 3.2.3**. ▪ **Exhibit 3.2-5**, Total Citywide Road Transportation Emissions GHG (MTCO2e) by Alternative: GHG per capita numbers are added below each alternative. ▪ **Exhibit 3.2-7**, Road Transportation Pollutant Emissions: Criteria pollutants are presented consistent with professional practice, but emissions comparing alternatives including the Preferred Alternative are provided.
225-7	Requests for additional analysis in Section 3.3 Plants & Animals. Why are tree management units by zone type and not by subarea? Please provide additional information that makes it clear that 6PPD-quinone originates from tires.	Information in **Exhibit 3.3-1** and related discussions comes from the City's 2022 Tree Canopy Analysis. That analysis divided the city into management units based on land uses. Given that the alternatives under consideration in this EIS concern land uses, that approach is appropriate for this analysis. The discussion of contaminants in stormwater runoff has been revised to acknowledge the source of 6PPD-quinone.
225-8	Requests for additional analysis in Section 3.4 Energy & Natural Resources. Request to provide a comparative building EUI for single-family homes based on existing energy data, clarify how the Transportation Plan factors into VMT and fuel usage numbers, and noted error in Exhibit 3.4-9 title.	The **Exhibit 3.4-9** caption is revised to "Net Annual Transportation Fuel Usage—Alternative ~~3~~ 5 (Trillion Btu)" in the Final EIS. There is no EUI for single family homes based on existing energy data available at this time. Regarding VMT and fuel usage, as density around transit increases, VMT and fuel usage is likely to go down. See **Section 3.2 Air Quality** and GHG Emissions for list of mitigation measures to reduce VMT including investments in multimodal transportation facilities.
225-9	Request to 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	A shown on **Exhibit 3.5-15, Exhibit 3.5-16, Exhibit 3.5-17, Exhibit 3.5-18**, and **Exhibit 3.5-19** modeled traffic noise levels would not exceed 65 dBA CNEL (which is the exterior noise level that can be attenuated to the recommended interior noise level of 45 dBA for residential uses) and the increases in traffic noise from existing conditions to buildout of each of the alternatives would be below the threshold of 1.5 dBA. Passive cooling and ventilation strategies requiring leaving windows open may result in slightly increased interior noise levels. However, it is not

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		possible to determine exterior-to-interior noise attenuation provided by open windows as several factors such as size of window opening, number of windows open, tilt of windows, architectural features, and distance to roadway need to be considered.
225-10	Suggested revisions and requests for additional analysis in Section 3.6 Land Use Patterns & Urban Form, including a request to clearly differentiate between the updated plan and the previous one to address historical inequities and suggested changes to dimensional standards to create additional capacity.	Comments noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. See **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, additional and/or expanded neighborhood centers, capacity near parks, and parking minimums. Zoning under the Preferred Alternative will remove barriers to housing development in all neighborhoods, diverging from the exclusionary zoning of the past. See also Responses to Comment 92-19, 225-12, and **Section 3.8.3** regarding measures to address disparate impacts of past policies and regulations. The Preferred Alternative's zoning proposals include several of these suggestions, including lot coverage of 50% in Neighborhood Residential zones. A potential mitigation measure addresses point access blocks (see **Section 3.6.3**), which are more feasible with relaxed side setback rules and result in a unified street incrementally over time. The shadows analysis identifies loss of solar access to public spaces during wintertime, when sunlight is most beneficial for heat and human enjoyment, as well as changes in solar access to existing trees. The Final EIS analysis does not emphasize summertime shadow impacts as adverse, since these shadows may help mitigate urban heat; the considerations shadows addressing urban heat is added under **Exhibit 3.6-76**. It includes a potential mitigation measure for future street tree species to be selected for hardiness in shady conditions. Final EIS **Exhibit 3.6-78**'s footnote notes that **Exhibit 2.1-1** in **Chapter 2** cross-walks the existing place types (which remain in Alternative 1) with proposed place type names under Alternatives 2-5. The Preferred Alternative includes changes to the Midrise zone at 85 feet. See **Appendix J**, Proposed Legislation. Center standards are planned for Phase 2 legislation. In EIS **Exhibit 3.6-93**, the future AU/acre is estimated to be lower at NE 130th as compared to 15th and 145th because Alternative 2 includes higher intensity residential zones in the 15th and 145th area than at the 130th station area. In Alternative 5, even when more intense zoning is applied and over a larger area in the 130th area, I-5 and steep slopes reduce the developable area within the urban center boundary, many parcels are not considered redevelopable, and larger areas have existing lower density residential than the 145th area, together resulting in a lower AU/acre despite a larger increase in housing supply. The Preferred Alternative would rezone single-family properties in

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		the 130th Street station area to multifamily or commercial zones, just like Alternative 5. PSRC calls for regionally designated Urban Growth Centers to plan for at least 45 AU/acre and Metro Growth Centers for 85 AU/acre. Note that AU/acre measures gross density over large areas that include public rights-of-way, parks, natural landforms and waterways, and other encumbrances that reduce developable land; it is not net density of a single project. The King County Countywide Planning Policies have higher AU/acre limits of 60-120 depending on center type. These are referenced in **Section 3.6 Land Use Patterns & Urban Form** under the Preferred Alternative. These intensity parameters are largely dependent on market forces. Eventually densities beyond the 20-year planning timeframe studied may be higher and closer to the ranges mentioned.
225-11	Suggested revisions and requests for additional analysis in Section 3.7 Relationship to Plans, Policies, & Regulations. 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. Please provide and study a regional center located in the South End, as requested by a number of members of the South End Community.	Comments noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to decision makers. The action alternatives would create a new housing element to meet new GMA requirements and address additional housing types and affordability levels. See **Section 4.2.1.1** regarding the affordable housing evaluation. See **Section 4.2.1.3** regarding additional and/or expanded neighborhood centers.
225-12	Suggested revisions and requests for additional analysis in Section 3.8 Housing. Request for a map of zoning changes intended to increase density and racial diversity in study areas with a higher percentage of "White, Non-Hispanic" residents than the Seattle average and in areas at low risk of displacement. How do the total projected new income-restricted units for each alternative compared to the current deficiencies identified in the EDI Community Indicators Report? For Alternative 5, identify strategies to reduce the ratio of net new units to units demolished to a number lower than Alternative 3 or increase the number of allowed housing units.	#106: Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. #107: The non-Project EIS evaluates place types for each alternative, appropriate to a 20-Year Comprehensive Plan. The City has developed draft zoning that draws from the future land use concepts in the One Seattle Plan and the EIS Alternatives. See **Appendix J**. #108: The One Seattle Plan outlines the monitoring and accountability framework for the Plan, which will include tracking indicators that tell us whether we are making progress on equity outcomes envisioned by the Plan. Please see page 12 in the Proposed Plan's introduction for more on this and how monitoring will build on the City's recent reporting on equitable development indicators and housing needs. Data from the from the indicators report and other parts of the Equitable Development Monitoring Program helped to inform new and expanded policies in the Plan that advance racial equity. #109: Regarding strategies to reduce units demolished per net new unit, this is determined by the location and nature of rezones. Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One

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		Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
225-13	Suggested revisions and requests for additional analysis in Section 3.10 Transportation.	#110: The VMT findings of the Final EIS are provided in **Exhibit 3.10-38, Exhibit 3.10-47, Exhibit 3.10-56**, and **Exhibit 3.10-65** and summarized together in **Exhibit 3.10-79**. Based on the regional travel demand model projections, the City would need to implement more aggressive measures to reach the Comprehensive Plan VMT reduction goal. The Seattle Transportation Plan sets out a long term vision for investments in transit, bike and pedestrian facilities to reduce VMT by 37% in 2044 relative to the 2018 baseline. The Seattle Transportation Plan includes a set of representative actions to reduce VMT that can be found on page 1-121 of the STP. #111: Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. #112: Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. #113: Freight, HOV, and SOV vehicles share the same lanes on most City roadways so LOS is reported for all vehicle modes together. #114: **Section 3.10.3 Mitigation Measures** in the Final EIS list potential strategies the City may pursue to reduce SOV mode share. The Seattle Transportation Plan includes additional detail on potential investments throughout the city. #115: The sensitivity tests were applied to the lowest growth and highest growth alternatives to provide a bookend of results. The other alternatives would fall within the range presented. #116: The Final EIS includes an analysis of the vehicle capacity changes proposed in the adopted Seattle Transportation Plan using both the No Action Alternative and Preferred Alternative land use assumptions.
225-14	Suggested revisions and requests for additional analysis in Section 3.11 Public Services. Request Final EIS addresses the City's capacity to deal with extreme weather events, including but not limited to a major earthquake event. Suggest Exhibit 3.11-1 show only the number of sworn officers from 2017 to 2022 or revise later exhibits to provide data all the way back to 2012. Revise projected students based on the expected number of family size	Comments noted and forwarded to City decisions makers. **Earthquake and Emergency Servies:** Regarding fire and emergency services see Final EIS **Section 3.11**. Building codes and Emergency Response Plans address seismic hazards, and are proposed to be included in Earth & Water Quality mitigation measures. See Final EIS **Section 3.1.3**. **Police:** **Exhibit 3.11-14** is updated with crime statistics to the year 2023**.** **Schools:** See Final EIS pages 3.11-60 and 3.11-61. The estimates of students is conservatively high given the recent fluctuations in enrollment. The City updates its comprehensive plan every 10 years and coordinates regularly with the district, and the school

Number	Comment Summary	Response
	units to be created through all studied alternatives.	district projects student cohorts more frequently and plans can be adaptively managed.
225-15	Suggested references to review and include in Final EIS analysis as well as request to fix a broken link to the Market Rate Housing Needs and Supply Analysis.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. The City has fixed the broken link to the Market Rate Housing Needs and Supply Analysis.
225-16	Request to provide missing appendices or information. Add a draft future zoning land use table to Appendix G. Request to provide the missing information for both the Pedestrian Master Plan as well as the Bicycle Master Plan in Appendix H.	Appendices for the Draft and Final EIS were posted online at https://www.seattle.gov/opcd/one-seattle-plan/project-documents. **Appendix G** provides detailed tables for existing land use conditions as well as proposed updates to Seattle's Neighborhood Residential zones. Future land use and zoning are discussed under **Section 3.6**. The Pedestrian Master Plan and Bicycle Master Plan are available online at https://www.seattle.gov/transportation/document-library/citywide-plans/modal-plans.
226	**Grant, Suzanne**	
226-1	Support for Alternative 2 since it has the lowest potential for development-related impacts to vegetation including loss of tree canopy cover. Series of questions regarding tree canopy such as acreage available for planting trees, projected increase in stormwater runoff, etc.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** for responses to comments in Letter 95 and similar, concerning the potential impacts of the alternatives on tree canopy, including the temporal loss of the essential benefits provided by tree canopy cover. Also see **Section 4.2.1.2** for responses to comments in Letter 500 and similar, concerning implementation of and the effectiveness of the City's Tree Protection Ordinance. Recommendations for revisions to the text of the One Seattle Plan have been forwarded to City decision makers. See **Section 4.2.1.2**. Calculation of the projected increase in stormwater runoff and associated management costs are beyond the scope of this study and will depend on specific future development.
227	**Graves**	
227-1	Concerns and misleading statements in the Plan about adverse impacts on the environment, water quality, noise, air quality and GHG emissions, plants, and animals.	The finding of "No significant adverse impact" to water resources is based on code compliance of future development associated with the Plan Alternatives and the mitigation measures included in the Plan. Cumulative avoidance of more egregious impacts to water resources in the region is presented as a consideration, not a mitigation measure. See **Section 4.2.1.2** for responses to comment themes on the Tree Canopy Evaluation.
228	**Green**	
228-1	Disappointment with the Plan because it lacks vision of the future and awareness of the current state	Comments noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes

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	and future realities of housing in Seattle.	related to the One Seattle Plan will be forwarded to the decision makers.
229	**Griffin 1**	
229-1	Study industrial areas such as SoDo and InterBay for possibility of transforming these areas into mixed use walkable neighborhoods.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also the City's Industrial and Maritime Strategy adopted in 2023.
230	**Griffin 2**	
230-1	Suggest creative ways to increase density and greenery simultaneously. As well as study developer incentives.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
231	**Griffin 3**	
231-1	Study taller buildings in neighborhood centers, urban centers and regional centers and options for unlimited building height in those areas. As well as significantly expanding neighborhood centers and study more than the 42 outlined in Alternative 5.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding changes to zoning standards in centers and additional and/or expanded neighborhood centers.
232	**Griffin 4**	
232-1	Study bolder options to build more housing, such as 5 story apartment buildings city-wide, plan for 200,000 new homes, and 80 neighborhood centers.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. The Preferred Alternative studies growth of 120,000 housing units and includes 30 neighborhood centers. See **Section 4.2.1.3** regarding studied growth and additional and/or expanded neighborhood centers.
233	**Griffin 5**	
233-1	Study zoning for offices, housing, and retail throughout the city.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
234	**Griffin 6**	
234-1	Study Duwamish River to make it the crown jewel of the City, what would it take to restore native wetland along the entire river with walking tails for the public?	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.

Number	Comment Summary	Response
235	Griffith, Jonah	
235-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
236	Griffith, Katy	
236-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
237	Gross	
237-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
238	Gwinn	
238-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.

Individuals by Last Name (H – P)

Exhibit 4.2-6. Written Comments and Responses, 2024—Individuals (H – P)

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239	Hagerty	
239-1	Support for Alternative 5 and suggest studying the impacts and opportunities to parking minimums, additional neighborhood centers, expanded high-rise zoning, social housing, etc.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding changes to zoning standards in centers, additional and/or expanded neighborhood centers, and parking minimums.
240	Haines	
240-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
241	Hammarlund 1	
241-1	The City owns 40 feet of right-of-way on Roosevelt Way from 3rd 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.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
242	Hammarlund 2	
242-1	Support for Alternative 5 because it encourages the development of additional low-income housing and	Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives

Number	Comment Summary	Response
	lowers the carbon footprint of residents. Support for Haller Lake United Methodist Church subdivision, and revision of Draft EIS to include NC-55 zoning for the church property.	so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
243	**Hance**	
243-1	Concern for loss of tree canopy. Appalled at the many houses being built in Seattle without leaving any room for trees.	See **Section 4.2.1.2** regarding tree canopy.
244	**Hannah**	
244-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
245	**Harper**	
245-1	Same content as Letter 226, regarding tree canopy concerns and questions.	See Response to Comment 226-1.
246	**Havkins**	
246-1	Has the Thornton Creek Watershed been considered in these growth plans? It is very close to 130th and 145th street.	EIS **Section 3.1** considers impacts of development on Thornton Creek, including in the 130th/145th Station Area.
246-2	Range of concerns and questions from safety, landscape and parks maintenance. Such as are there adequate safeguards for bike storage for commuters? How will trails be kept safe from homeless encampments.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
247	**Hedlund**	
247-1	The city did not listen to the overwhelming majority's call for an Alternative 6, which would enable the creation of more walkable neighborhoods. The plan should add many more neighborhood centers.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding changes to zoning standards in centers and additional and/or expanded neighborhood centers.
248	**Heerwagen**	
248-1	Study the impacts of additional neighborhood centers off of arterials. Supports Alternative 5.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required Desired policy changes related to the One Seattle Plan will be forwarded to the decision

Number	Comment Summary	Response
		makers. See **Section 4.2.1.3** regarding additional and/or expanded neighborhood centers.
249	**Hill**	
249-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
250	**Hiltbrunner**	
250-1	Is there broadband capacity to accommodate equitable internet access for all residents, but also ensure 150/150 broadband speeds for all, per the RCW 43.330.536 state-level goal definitions?	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
251	**Holland**	
251-1	Rework the Comp Plan to expand housing capacity across the city and not just in isolated pockets and along car-chocked arterials.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
252	**Horn**	
252-1	Require developers to retain big trees as much as possible. Require designs to incorporate existing trees.	See **Section 4.2.1.2** for responses to comment themes on the Tree Canopy Evaluation.
253	**Howe**	
253-1	Consider Alternative 2 and 4. Same content as Letter 83, regarding plants, animals, and tree canopy.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
254	**Hranac**	
254-1	Similar content as Letter 83 regarding plants, animals, and tree canopy with additional personal locational context and impact.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
255	**Hutchins**	
255-1	Benefits of building a denser city outweigh the temporary impacts during development. Advocate for taller buildings in growth areas, zoning for mass timber, zoning for more than townhomes, reward	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, additional and/or

Number	Comment Summary	Response
	extra units, do not count ADUs when counting density, resist urge to expand MHA, remove parking mandates, etc.	expanded neighborhood centers, capacity near parks, and parking minimums.
256	**Irwin**	
256-1	Support Alternative 2, best choice for giving growth while keeping climate impact considerations a high priority.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
257	**Itano**	
257-1	The plan is written with too much legalese; I cannot understand if the Plan protects our trees. Concern that beloved trees are being replaced by 60 plus apartment buildings that have no parking.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** for response regarding tree canopy.
258	**Janzen**	
258-1	List of questions and concern for tree canopy loss including but not limited to estimation of potential canopy acreage loss, feasibility to reach citywide goal, and suggested recommendations to mitigate tree canopy loss.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** for responses regarding tree canopy.
259	**Jarvis**	
259-1	Support all of Haller Lake from the line of Meridian to I-5 to be upzoned like Shoreline.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
260	**Jaureguy**	
260-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
261	**Jeannette**	
261-1	Support Alternative 5, we need more housing for Seattle's future. However, what is proposed might not even go far enough, if the proposal only meets today's needs then we will still have a problem in the future.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.3** regarding studied growth.

Number	Comment Summary	Response
262	**Jeniker**	
262-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
263	**Jerome**	
263-1	Amend the Comp Plan to increase housing. Something closer to the previous "housing abundance map" would be a great start.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. See also **Section 4.2.1.3** regarding studied growth and additional and/or expanded neighborhood centers.
264	**Johnson, Carla**	
264-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
265	**Johnson, Iskra 1**	
265-1	What provisions are in Draft Plan to help reach the 30% tree canopy goal by 2037.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding tree canopy.
266	**Johnson, Iskra 2**	
266-1	According to King County's Urban Growth Capacity Report, King County already has capacity for 400,000 more housing units. Why is this data being disregarded in estimates?	Seattle's housing affordability crisis is due in large part to an undersupply of housing compared to demand. The action alternatives proposed in the EIS are each designed to support a different growth strategy for supporting and encouraging increased housing production and increased housing choice in Seattle.
266-2	Given current tree code, what calculations has the EIS done to predict the future of tree canopy under the Draft Plan's additional density. Questions about the effect of the Plan on plants, animals, stream, and watershed health.	See **Section 4.2.1.2** for responses to comments in Letter 95 and similar, concerning the analysis methodology for the evaluations of the alternatives in this programmatic, non-project EIS. Also see the response to Comment 2-7 concerning the feasibility of retaining trees on lots undergoing development or redevelopment. See **Section 4.2.1.2** for Responses to Letter 500 and similar, concerning implementation of and the effectiveness of the City's Tree Protection Ordinance. The impacts of the alternatives on plants and animals (terrestrial and aquatic species), as well as impacts related to heat islands, are described and evaluated in **Section 3.3.2** of the EIS.
266-3	Questions and concerns about city's sewer capacity to handle storm overflow in the new climate of extreme rainfall with added density and hardscaping.	Final EIS **Section 3.12** discusses impacts to utilities under each of the alternatives. This includes an analysis of impacts to wastewater and stormwater services, including potential impacts from climate change on utility infrastructure. Impacts of the alternatives relating to stormwater and flooding are described and evaluated in **Section 3.1.2** of the EIS.
266-4	Concerns around mitigating damages from loss of stormwater	Measures for mitigating for impacts of the alternatives relating to stormwater management are discussed in **Section 3.1.3** of the EIS.

Number	Comment Summary	Response
	management functions provided by trees.	
266-5	Has the Draft EIS verified the assumptions that 100,000 new units of housing will trickle down to create greater affordability? Additional questions around affordability and gentrification.	See response to Comment 44-2. See also **Section 4.2.1.1** regarding the affordable housing evaluation.
267	**Johnston**	
267-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
268	**Jones, Judi**	
268-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
269	**Jones, Mary**	
269-1	Same content as Letter 95 regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
270	**Joseph**	
270-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
271	**K R**	
271-1	Questions around housing, request to provide evidence for supply-side trickle-down theory. Request to include definition of "affordability," require developments to build sidewalks, implement impact fees or commensurate public benefit compensation for investors in NC Commercial zone properties.	**Housing supply and affordability:** See response to Comment 44-2. **Definition of "affordability":** See response to Comment 44-1. See also **Section 4.2.1.1** regarding the affordable housing evaluation. **Public benefit:** The alternatives do not include any changes to city policies regarding impact fees or commensurate public benefits.
271-2	Against the upzone of residential blocks between 85th and 80th near Greenwood Ave.	Comment noted. This comment is beyond the scope of environmental review of the One Seattle Plan so no response is necessary. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
272	**Kaldowski**	
272-1	The City did not listen to the overwhelming call for an Alternative 6 vision, which would encourage social housing in all neighborhoods. The plan should add many more neighborhood centers.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth and additional and/or expanded neighborhood centers.

Number	Comment Summary	Response
273	**Keefe**	
273-1	The Comp Plan poorly documents that plants and animals will not be affected by planned building scenarios. Preservation of urban forest lands and parks must be a high priority. New plantings will not compensate for those removed for development, since it takes years for new trees to equal the sequestering ability of mature trees.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
274	**Keller, Sophia**	
274-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
275	**Keller, Kathryn**	
275-1	Concerns on growth in the Central Area.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
275-2	Section 3.1 Earth & Water 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.	The EIS includes a summary of existing conditions for reference, but all EIS impact analysis is conducted by evaluating the proposed land use alternatives. Evaluation of existing threats to earth and water resources is outside of the scope of this programmatic EIS, which focuses on how the proposed land use alternatives might change things in the future as compared to the no action alternative. Also, note that current development in and around critical areas (like landslide and flood prone areas) must comply with City codes that require specific protections to avoid or minimize impacts to those areas.
275-3	Section 3.6 Land Use should reflect more anti-displacement measures.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. Residential and commercial displacement are discussed comprehensively in Final EIS **Section 3.8 Population, Housing, & Employment**.
275-4	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.	See **Section 4.2.1.2** regarding tree canopy.
276	**Kelly, Peter**	
276-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.

Number	Comment Summary	Response
277	**Kelly, Shana**	
277-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
278	**Kerkof**	
278-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
279	**Kidder**	
279-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
280	**Kimball**	
280-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
281	**King**	
281-1	Alternative 2 and 4 are less harmful than 3 and 5. Concern about cutting down big trees that help mitigate climate change, and concern for Seattle's short and long range livability as climate change continues to impact our region.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** regarding tree canopy.
282	**Kirchoff**	
282-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
283	**Kirk**	
283-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
284	**Kirschner**	
284-1	Concerns on disproportionate impacts from major freight routes, busy arterials, and sources of industrial pollution on BIPOC communities.	The Final EIS acknowledges that housing policy and zoning laws have a history of causing harm to Black, Indigenous, and People of Color in Seattle—Final EIS **Section 3.6.2** evaluates land use patterns proposed under each alternative and potential resulting compatibility conflicts for their likelihood to intensify or lessen these historical inequities. Final EIS **Section 3.10** considers race and social justice in relation to access to comfortable/connected transportation facilities and transportation options. EIS **Section 3.2.2** and **Section 3.5.2** consider air quality and noise impacts, respectively, including exposure to air and noise pollution. See also Response to Comment 5-3.

Number	Comment Summary	Response
285	**Kitchen**	
285-1	Support for original abundance map and support an Alternative 6. The plan should add many more neighborhood centers.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth and additional and/or expanded neighborhood centers.
286	**Klein**	
286-1	Support for Alternative 5. Suggest studying the impact of corner stores.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
287	**Knoblet**	
287-1	Concern for tree canopy, please consider all the critters that are displaced by cutting down trees.	See **Section 4.2.1.2** regarding plants, animals, and tree canopy.
288	**Kordick**	
288-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
288-2	Do not support the neighborhood center planned for Roosevelt Ave NE and NE 90th in Maple Leaf, as it will destroy a large section of an established neighborhood.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
289	**Kramer**	
289-1	Support for the Housing Abundance Map for the Comp Plan, we desperately need more housing.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth.
290	**Kuczmarski**	
290-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
291	**Lafferty**	
291-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.

Number	Comment Summary	Response
292	**Lange**	
292-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
293	**Langhans 1**	
293-1	Question around building DADU's on steep hills, how to build on narrow lots to maximize coverage and profits.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
293-2	Questions and concerns around issue of light pollution and impact of surrounding taller buildings on solar panels.	Under all alternatives the City allows heights taller than existing structures throughout the city to achieve housing and other goals. Three-story buildings are already allowed in Neighborhood Residential zones, which could cast shadows on existing 1-2 story structures. The analysis acknowledges that shadows may fall on existing solar panels but that as a citywide analysis, it cannot address this impact at the project scale. The City zoning standards address structure height and adjacent solar access in various zones such as Downtown, Lowrise, and Seattle Mixed. Seattle Municipal Code requires lighting techniques to avoid light on neighboring properties and minimize impacts to the night sky (e.g., SMC 23.44.008.H), and projects that trigger SEPA analysis are required to consider light and glare impacts. Concerns about loss of green spaces and affordable family-sized units are noted. The EIS addresses the provision of public parks and open spaces in **Section 3.11**. The City POS addresses demand for parks in proximity to multifamily units. See **Section 4.2.1.3**.
293-3	Concerns around safety issues of corner stores.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
293-4	Questions and suggestions about fence regulations and encouraging gardens and yards.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
293-5	Suggestion to wait until the results of the Pilot Program and its 35 projects to influence the Draft Plan.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. The City is required to update its Comprehensive Plan and development regulations to meet state deadlines under the GMA.

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294	**Langhans 2**	
294-1	Questions about how to increase housing units. Request for definition of affordability that is used in the Draft EIS. Question on whether the City's new zone maps will be revised independently of any outside influence of developers.	The term "affordable" refers to housing that costs less than 30% of the occupant's household income. This definition is in the EIS. The City is updating the zoning map consistent with changes needed to support growth targets. See also Response to Comment 44-1 and **Section 4.2.1.1**.
294-2	How will the city encourage a variety of home configurations such as cottage housing?	The Preferred Alternative supports a variety of housing types (including cottage housing and other middle housing consistent with HB 1110) that will support housing affordable to all economic segments of the population in Seattle. See also **Section 4.2.1.1** regarding the affordable housing evaluation.
294-3	Why the City is considering removal of design standards and reviews.	The City is revising its zoning regulations consistent with new state law. This includes HB 1110 which restricts design review and development standards for middle housing.
294-4	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.?	**Exhibit 3.6-9 through Exhibit 3.6-11** discuss regulations the City has in place to provide transitions between multifamily and commercial zones that abut Neighborhood Residential zones. Additionally, under the Preferred Alternative most Urban and neighborhood centers will use Lowrise zones as a transition between higher density zoning and Neighborhood Residential zones.
294-5	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? Suggested required steps for developers of new homes or major additions.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
294-6	Concerns and questions about strategies to create more housing units per lot, and impact to current residents of single-family homes.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. EIS **Section 3.8** considers residential displacement impacts of the alternatives. Individual property owners will continue to make choices about sale and/or redevelopment of their properties.
295	**Lappas**	
295-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.

Number	Comment Summary	Response
296	**Lavigne**	
296-1	Support for Alternative 5. Study impacts of a range of things including higher growth targets, additional neighborhood centers in urban neighborhoods, including off of arterials, social housing in every neighborhood etc.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth and additional and/or expanded neighborhood centers.
297	**Law**	
297-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
298	**Lazerwitz 1**	
298-1	Increase housing capacity projects to match future demand, aim for 120,000 new units over the next 20 years. Increase the number of neighborhood centers to 50 and allow building 6+ stories near job centers, transit hubs, mixed-used nodes, schools, and parks. Allow for taller midrise housing in growth areas and raise FAR from 0.9 to 1.2 (or 1.5 near transit and in neighborhood centers). Affordability is a major concern to all of us. Create significant floor area, height, and density bonuses for affordable and social housing and include tax rebate program for developers as an alternative to MHA. Include the OPCD proposed anti-displacement strategies in the Comp Plan. Remove parking requirements for housing on Neighborhood Residential lots.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, additional and/or expanded neighborhood centers, and parking minimums and **Section 4.2.1.1** regarding the affordable housing evaluation.
299	**Lazerwitz 2**	
299-1	Similar content as Letter 298 with support for Alternative 5 and reiteration of suggested revisions at the end of the letter.	See Response to Comment 298-1.
300	**Lazerwitz 3**	
300-1	Similar content as Letter 298 with support for Alternative 5 and reiteration of suggested revisions at the end of the letter. The City did not listen to the overwhelming	See Response to Comment 298-1.

Number	Comment Summary	Response
	majority call for an Alternative 6 vision. In Roosevelt, the Plan should include ideas that support HB1220 for affordable housing.	
301	**Lebegue**	
301-1	Summarize the Climate and Sustainability value and request that the City and the state close the chapter on Blue Angels at Seafair. PM2.5 particles, greenhouse gases, and jet noise is not good for us.	Comments noted and forwarded to City decisions makers. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
302	**Leconte**	
302-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
303	**Lee**	
303-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
304	**Leonard**	
304-1	Concerns about growth and its effect on trees and wildlife habitat.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.2** regarding tree canopy.
305	**Leshner**	
305-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
306	**LeVine**	
306-1	Alternative 2 will be the least destructive to Seattle's exceptional tree canopy, our vegetation and the urban wildlife. Suggestions to mitigate measures to retain mature trees include but not limited to amending the tree protection ordinance to retain existing trees 6" DSH and larger, support building higher and building attached units to allow for tree retention and planting areas, remove basic tree protection area loophole.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** regarding tree canopy, including responses to comments in Letter 500 and similar, concerning implementation of and the effectiveness of the City's Tree Protection Ordinance.

Number	Comment Summary	Response
307	**Lewis, Sarah**	
307-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
308	**Lewis, Christine**	
308-1	Keep Green Lake perimeter as it is. Development should occur along the arterials not neighborhood streets.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
309	**Lim**	
309-1	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 and other municipalities adopted standards. Without these increases the units built will be smaller and disincentivize them from being built at all. Disagree on reduced zoning for South Seattle neighborhoods.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding changes to zoning standards in centers.
310	**Limberg**	
310-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
311	**Lin**	
311-1	Consider range of effects on; solar panels, light, parking, traffic, public safety, tree canopy, mobility for people with wheelchairs or strollers, parks (including dog parks), neighborhood character, small businesses, public art, trash and graffiti.	**Parking**: While the City will continue to actively manage its on-street parking supply as well as consider whether changes to parking requirements are appropriate, parking is not a required element for SEPA documents and therefore is not explicitly studied in this EIS. **Traffic**: **Section 3.10** provides an evaluation of the transportation effects of the alternatives. This includes the following metrics: mode share, vehicle miles traveled, vehicle hours traveled, average trip speed, corridor level of service, vehicle volume to capacity at a variety of screenlines, intersection level of service in the NE 130th/NE 145th Street Subarea, and performance on state facilities. **Mobility for people with wheelchairs or strollers**: **Section 3.10** provides a summary of current conditions for people walking, biking, and rolling and an evaluation about how those conditions would change with each of the EIS alternatives. Because this is a programmatic EIS, the evaluation is done at a high level across the city. Detailed evaluation of effects to non-motorized facilities from specific developments would occur through the City's project review process.

Number	Comment Summary	Response
312	**Little**	
312-1	Support for Alternative 5. Haller Lake United Methodist Church is considering development of low income housing and would like to include retail space for a more accessible and appealing neighborhood.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
313	**Loder**	
313-1	Skeptical that there will be no overall effect on our area waterways, can our system really handle 200,000 more users? Moderate tree canopy loss is not acceptable.	The potential impacts of the alternatives on utilities, including wastewater infrastructure, are described and evaluated in **Section 3.12** of the EIS; see **Section 3.1** of the EIS for additional analysis relating to stormwater management. See also **Section 4.2.1.2** regarding tree canopy.
313-2	Glad to see renter displacement acknowledged. How much empty/available land is there that could be added to the park system? There is no mitigation for the impact of more cars on our streets. How are we ensuring pedestrian safety?	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. The City updated its Parks LOS as part of a 2024 update to the POS Plan to make it more consistent with the City's goals and approach to acquisition. The 2024 POS Plan Update proposes to change the LOS from an acres per 1,000 people standard to providing parks and park facilities within a 10-minute walk. See the POS Plan Update for measures to enhance the park system. The EIS provides an evaluation of the transportation effects of the alternatives (**Section 3.10.2 Impacts**) as well as mitigation for the impacts that are identified (**Section 3.10.3 Mitigation Measures**).
314	**Loeber**	
314-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
315	**Lorey 1**	
315-1	The City did not listen to the overwhelming majority's call for an Alternative 6 vision, which would lower the cost of housing. Plan needs to address HB 1110, requirements, use Commerce's model middle housing ordinance as a minimum standard, add back additional neighborhood centers, increase capacity in the grids between high traffic corridors (instead of along these corridors), and eliminate parking minimums citywide.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, additional and/or expanded neighborhood centers, capacity near parks and other amenities, and parking minimums.

Number	Comment Summary	Response
316	**Lorey 2**	
316-1	Support bringing the Comp Plan back in line with the original map OPCD drafted. This proposal ensures we can meet our expected housing demand and prepare for unexpected future increases in housing demand.	Comments noted and forwarded to City decision makers. See **Section 4.2.1.3** regarding studied growth.
317	**Lowhim 1**	
317-1	Increase the housing in Seattle.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
318	**Lowhim 2**	
318-1	Support a dense built up village on 17th and Cherry.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
319	**Ludman**	
319-1	Support Alternative 2; include suggestions to mitigate tree canopy loss similar to Letter 306 as well as suggesting to require developers to submit a tree inventory.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** regarding tree canopy, including responses to comments in Letter 500 and similar, concerning implementation of and the effectiveness of the City's Tree Protection Ordinance.
320	**Lukose**	
320-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
321	**Lund**	
321-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
322	**Luxem**	
322-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
323	**Lyris**	
323-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.

Number	Comment Summary	Response
324	**Martin**	
324-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
325	**Mashayekh**	
325-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
326	**Maslan**	
326-1	Similar content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
327	**Mattione**	
327-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
328	**Mauel**	
328-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
329	**McCormick**	
329-1	Similar content as Letter 83 regarding plants, animals, and tree canopy with additional detailed questions.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy. Analyses in **Section 3.3.2** of the EIS describe and evaluate the potential impacts of the alternatives on plants and animals in the city, including species associated with mature forest habitat. Also see **Section 4.2.1.2** for responses to comments in Letter 500 and similar, concerning implementation of and the effectiveness of the City's Tree Protection Ordinance.
329-2	Same suggestions to mitigate tree canopy loss as Letter 306.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** regarding tree canopy.
330	**McCue**	
330-1	Impact of higher growth targets should be studied as an Alternative 6. Alternative 5 is most preferable of current proposals, but more growth appears necessary to comply with state law.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth.
331	**McDonald**	
331-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.

Number	Comment Summary	Response
332	**McEwuen**	
332-1	Support for Alternative 5 for addressing the city's severe housing shortage, but much more can be done to encourage housing production. List of supported strategies including but not limited to maximize development capacity and remove or reduce zoning barriers in target growth areas, regional center in southeast Seattle, residential uses in manufacturing industrial centers, etc. Do not support additional impact fees or an increase in MHA fees.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth and **Section 4.2.1.1** regarding the affordable housing evaluation.
333	**McKiernan**	
333-1	Similar content as Letter 83 regarding plants, animals, and tree canopy with the same additional detailed questions as Letter 329-1.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy. Also see **Section 4.2.1.2** for Responses to Letter 500 and similar, concerning implementation of and the effectiveness of the City's Tree Protection Ordinance.
333-2	Same suggestions to mitigate tree canopy loss as Letter 306.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** regarding tree canopy.
334	**Michalski**	
334-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
335	**Miller, Anne**	
335-1	Support Alternative 2, due to lowest potential for development related impacts to vegetation. Same suggestions to mitigate tree canopy loss as Letter 306.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** regarding plants, animals, and tree canopy.
336	**Miller, Bonnie**	
337-1	Concerns and questions around natural urban environment, and loss of tree canopy.	See **Section 4.2.1.2** for Responses to Letter 500 and similar, concerning implementation of and the effectiveness of the City's Tree Protection Ordinance.
337	**Miller, Cameron Sidney**	
337-1	The city did not listen to overwhelming majority's call for an Alternative 6 vision. Zoning and FAR regulations should be changed	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision

Number	Comment Summary	Response
	to not just allow but encourage stacked-flat, 6-plexes across the board, at minimum 8-12-plexes in most places.	makers. See **Section 4.2.1.3** regarding studied growth and changes to zoning standards in centers.
338	**Miller-Dowell Amy**	
338-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
339	**Mireia**	
339-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
340	**Moehring 1**	
340-1	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 residential given the 2040 transit capacity, proximity to City Center, and jobs.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
341	**Moehring 2**	
341-1	Support Alternative 2 and 4. Similar content as Letter 83, regarding tree canopy, and impact to plant and animals.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
342	**Morgan 1**	
342-1	Concerns around sprawl. What measures does this plan anticipate to actually deter development in outlying areas of the region other than allowing it in the city?	State, regional, and local policies and objectives make clear that the long-term sustainability of rural and resource lands is dependent on accommodating development within the designated urban growth area (e.g., the GMA, VISION 2050, and King County CPPs). Each studied alternative encourages development in Seattle (an urban environment)—focused in designated centers and near transit stations—to reduce the inappropriate conversion of undeveloped land into sprawling, low-density development. The Preferred Alternative provides for more growth and could add capacity to meet additional state and regional objectives, including improved balance of jobs and housing, creating opportunities for middle housing, focusing more growth around transit investments, and contributing to a pattern of growth that supports regional climate goals.
342-2	Concerns around impact to plants and animals. Disagreement with	See **Section 4.2.1.2** regarding plants, animals, and tree canopy.

Number	Comment Summary	Response
	stated impacts and mitigation measures to plants and animals, and concern for loss of tree canopy.	
342-3	Concern around land use patterns, inconsistencies in development scale and density by permitting 4 - story development and near full lot development in Neighborhood Residential zones. No buffer proposed between Neighborhood Residential zones in neighborhood centers where zoning allowing 7-story developments, particularly where large-scale development along frequent transit arterials is to be extended one-block into adjacent Neighborhood Residential zones	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. New place types and/or expanded housing options in existing Neighborhood Residential zones proposed as part of the action alternatives would introduce localized land use and urban form impacts where newer development is of greater height and intensity than existing development. Over time, additional growth and development will occur in Seattle and a generalized increase in development intensity, height, bulk, and scale is expected under all alternatives—this gradual conversion of lower-intensity uses to higher-intensity development patterns is unavoidable but an expected characteristic of urban population and employment growth. Under the Preferred Alternative, Neighborhood Residential zones allow four-story buildings only if 50% of the units are affordable and the site is within a quarter-mile of frequent transit. Otherwise, three-story buildings are allowed. Also see Response to Comment 294-4 regarding transitions between multifamily and commercial zones that abut Neighborhood Residential zones. Overall, the new place types would create smoother and more varied transitions in intensity throughout the city (especially adjacent to urban center and village boundaries).
342-4	The decision to establish neighborhood centers prior to localized analysis of pedestrian and transportation conditions will lead to unanticipated significant adverse transportation impacts.	Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. The STP EIS addresses the effect of different investments on land use alternatives similar to Alternative 5 which includes the concept of neighborhood centers. This Final EIS evaluates the Preferred Alternative and the potential transportation improvements associated with the Comprehensive Plan within the 20-year planning period within the 20-year planning period based on both the STP plan.
343	**Morgan 2**	
343-1	Same content as Letter 342-1 from points 1-3.	See Response to Comments 342-1 and 342-2.
344	**Morgan 3**	
344-1	Same content as Letter 342-2 from points 4-5.	See Response to Comments 342-3 and 342-4.
345	**Morrow**	
345-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.

Number	Comment Summary	Response
346	**Muir 1**	
346-1	Inaccurate statement regarding tree loss. Tree canopy loss on lots undergoing development should look at loss on all projects finished in 2016-2020.	See Response to Comment 20-6 and **Section 4.2.1.2**. The City has evaluated the alternatives with regard to the recently amended 2023 Tree Code amendments.
347	**Muir 2**	
347-1	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.	Analyses in the EIS are consistent with SEPA requirements for programmatic, non-project reviews, per WAC 197-11-442. The analyses in the EIS have been expanded to address the potential for temporal loss (i.e., time lag between the loss of functions provided by removed trees and the replacement those functions by planted trees) of the essential benefits provided by tree canopy cover. Also see **Section 4.2.1.2** for responses to comments in Letter 500 and similar, concerning implementation of and the effectiveness of the City's Tree Protection Ordinance.
348	**Muller**	
348-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
349	**Neylan**	
349-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
350	**Nicol**	
350-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
351	**Nims**	
351-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
352	**Niven**	
352-1	Support Alternative 2 and 4. Similar content as Letter 83, regarding tree canopy, and impact to plant and animals.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
353	**Niznik**	
353-1	Concerns about the loss of trees and wildlife habitat, especially near the 130th Street Station. Support Alternative 1 which will result in less destruction of neighborhoods and green space. Questions around the tree canopy and same suggestions to mitigate tree canopy loss as Letter 306.	Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** regarding tree canopy.

Number	Comment Summary	Response
354	**Nordstrom**	
354-1	Update the Plan to be bolder around housing capacity and growth. Consider expanding urban centers near transit and adding additional neighborhood centers, allow corner stores in more places, and more types of middle housing in Neighborhood Residential zones. Give substantial bonuses in FAR, height, etc. for affordable housing provision.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, and corners stores and **Section 4.2.1.1** regarding the affordable housing evaluation.
355	**O, Pennie**	
355-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
356	**O'Steen**	
356-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
357	**Obray**	
357-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
358	**Okamoto**	
358-1	Support Alternative 2, must sustain a healthy ecosystem that promotes well-being, resilience, clear air, tree canopy, and sustainability equitably across all neighborhoods.	Comments noted and forwarded to City decision makers. See also **Section 4.2.1.2** tree canopy.
359	**Olson**	
359-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
360	**Olwell**	
360-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
361	**Ortega**	
361-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
362	**Ortiz**	
362-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.

Number	Comment Summary	Response
363	**Ostrer**	
363-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
364	**Overgaard**	
364-1	Similar content as Letter 83, regarding tree canopy, and impact to plant and animals. Support for Alternative 2 or 4.	Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
364-2	Reduce proposed expansion area of Upper Queen Anne by 50%. 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.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.3**.
365	**Oxman**	
365-1	Include the tree canopy goals of 30% working goal, and 40% aspirational goal to be accomplished by 2037. Add language that equity will only be achieved by allocating greater funding of maintenance in underserved locations.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
366	**Pan**	
366-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
367	**Paul**	
367-1	Study impacts of floor area ratio bonuses that incentivize stacked flat development rather than attached or detached townhomes. Of the proposed options prefer Alternative 5 but prefer that City look at higher growth targets than Alternative 5.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth and changes to zoning standards in centers.
368	**Pearson**	
368-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
369	**Pedroso**	
369-1	Concern about the vagueness of the Draft EIS when it comes to our urban vegetation and wildlife.	See **Section 4.2.1.2** regarding plants and animals.

Number	Comment Summary	Response
	Provide more information on impact to plants and animals.	
369-2	Hard time believing the Draft EIS actually stated that this would minimize development in rural areas. Please back up assertions.	See Response to Comment 342-1.
370	**Pelland**	
370-1	Recommend minimum changes to improve the Plan including support missing middle housing, include provisions for transit-oriented development, eliminate parking requirements.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.3** regarding changes to zoning standards in centers and parking minimums and **Section 4.2.1.1** regarding the affordable housing evaluation.
371	**Pellkofer**	
371-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
372	**Penrose**	
372-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
373	**Peterson**	
373-1	Concern on North 148th Street station placement. Allow higher density apartment buildings in the neighborhood between North 130th and North 135th streets and suggested mitigation options. Additional concern on tree canopy loss. Suggestion to add green space, such as pocket parks.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** regarding tree canopy. See also **Section 3.11 Public Services** which includes an evaluation of parks including under the City's recently amended Parks, Recreation, and Open Space Plan.
374	**Pifer**	
374-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Comment 83 and similar regarding plants, animals, and tree canopy.
375	**Pike 1**	
375-1	The City did not listen to the overwhelming majority's call for an Alternative 6. The plan should eliminate parking minimums, convert underutilized golf courses into free public parks and affordable housing, and allow taller	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, capacity near parks, and parking minimums.

Number	Comment Summary	Response
	and bigger buildings in more neighborhoods.	
376	**Pike 2**	
376-1	The plan should be more ambitious in upzoning to increase density. Revise to allow bigger buildings, restore all 42 originally proposed neighborhood centers, match or exceed the state floor area minimums and allow more density housing, etc.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. The Preferred Alternative studies growth of 120,000 housing units and includes 30 neighborhood centers. See also **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, additional and/or expanded neighborhood centers, corner stores, and parking minimums.
377	**Pike 3**	
377-1	Disappointed that Mayor's office disregarded call for a much bolder growth strategy. Residents want to see bold change – more dense housing, more housing around transit corridors, more corner stores in neighborhoods. The plan does not accommodate the number of new residents projected to arrive.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. The Preferred Alternative studies growth of 120,000 housing units. See also **Section 4.2.1.3**regarding studied growth and **Section 4.2.1.1** regarding the affordable housing evaluation.
378	**Placido**	
378-1	Regarding the 130th and 145th Station area, support for Combined (Alternative 5) or Focused (Alternative 2). As a resident, we expect big, lasting changes that coincide and take advantage of the improvements happening on Aurora.	Comment noted. This comment is beyond the scope of environmental review of the One Seattle Plan so no response is necessary. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
379	**Pope 1**	
379-1	Increase greening our communities not depleting these resources. Concern that in your haste to develop, you are ignoring studies from the largest urban centers in the world that prioritize increasing green spaces as a way to enhance environmental and ecological benefits. Suggest clarity around specific tree canopy statements.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** for responses to comments in Letter 83 and similar regarding concerns about the effectiveness of tree planting programs.
380	**Pope 2**	
380-1	Specify who is addressing (which departments or committees) day-to-day decisions regarding	See **Section 4.2.1.2** for responses to comments in Letter 500 and similar regarding concerns about the effectiveness of City's Tree Protection Ordinance. Also see **Section 4.2.1.2** for responses to

Number	Comment Summary	Response
	preserving existing green spaces in all zones. Request specific studies that show planning programs can compensate for loss of larger trees; what oversight will be in place going forward to ensure scientist will lead the SDCI decisions in the approach to tree preservation.	comments in Letter 83 and similar regarding concerns about the effectiveness of tree planting programs. See also **Section 3.11** for an evaluation of demand for parks under each alternative, and **Section 4.2.1.3** regarding the City's POS and providing parks in proximity to areas of growth. See also Response to Comment 188-1 regarding the City's approach to street trees.
381	**Price**	
381-1	Similar content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.

Individuals by Last Name (Q – Z)

Exhibit 4.2-7. Written Comments and Responses, 2024—Individuals (Q – Z)

Number	Comment Summary	Response
382	**Quarre**	
382-1	Add policy regarding restoring ecological conditions.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
382-2	Be inclusive of neighbors as part of "community partners" who collaborate on Shoreline Street Ends.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
383	**Radmanovic**	
383-1	Concern by the proposal to rezone West Green Lake neighborhood to allow up to 3-6 story buildings. Please use C1-55 (M) zoned area along Aurora in West Green Lake for building affordable housing instead of rezoning.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
384	**Rai Trapero**	
384-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
385	**Ramsdell**	
385-1	Support managed growth to add housing in the 130th Station Rezone. Support focused growth between I-5 and Aurora along 130th that will enhance safe walking. Focus on	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.

Number	Comment Summary	Response
	transportation corridors as noted in Alternative 4. Add high-rise apartments around neighborhood amenities for elderly.	
385-2	Support Alternative 5 level of growth if developers are required to maintain a maximum percentage of healthy, long-living trees.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.2** regarding tree canopy.
386	**Rava**	
386-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
387	**Ravell, Padial**	
387-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
388	**Ravell, Mireia**	
388-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
389	**Reuben**	
389-1	The Draft Plan does not plan for enough housing, keeping housing production below expected growth. Includes six recommendations similar to Letter 128 to embrace housing abundance.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, additional and/or expanded neighborhood centers, corner stores, and parking minimums.
390	**Riley**	
390-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
391	**Robb**	
391-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
392	**Roberts**	
392-1	Own home located next to the E. Harrison Street End on Lake Washington. Concern on deteriorating conditions on Shoreline Street Ends. Proposed revision to draft Policy P 1.14 and to the glossary definition of Shoreline Street Ends.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.

Number	Comment Summary	Response
393	**Robinson**	
393-1	Property and business owner at 12303 15th Ave NE. Support for changing zoning in the 130th 145th Street Station Area, Alternative 2 and 5.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
394	**Rock**	
394-1	Bring back the planner proposed Abundance map that begins to meet the needs of our growing city instead of politically motivated opinions.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth.
395	**Roda**	
395-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
396	**Root**	
396-1	Concerns and questions around tree canopy; is there a concrete plan to ensure that trees will be planted in a timely fashion? Supported analysis of what the impacts of trees and wildlife are expected to be.	See **Section 4.2.1.2** regarding plants, animals, and tree canopy.
397	**Roraback**	
397-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
398	**Rose**	
398-1	Support Alternative 2 or 4 for future housing plans as there is more possibility to maintain tree canopy. Maximize retention of existing trees 6" DSH and larger. What impacts will be on plants and animals in each alternative.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** regarding tree canopy.
399	**Rosentreter**	
399-1	Support OPCD Abundance Map and reject current plan that significantly reduced the amount of planned housing.	Comments noted and forwarded to City decision makers. See **Section 4.2.1.3** regarding studied growth.
400	**Rubenkonig**	
400-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.

Number	Comment Summary	Response
401	**Ruha**	
401-1	Comment on energy efficient construction, tree canopy cover, access to healthy food and pharmaceuticals.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. The Preferred Alternative includes the following concepts noted in the comment: energy efficient construction; ; walkable neighborhoods with residences and services and amenities in close proximity; neighborhood streets with smaller multifamily buildings, trees, and gardens; decreased hardscape and increased vegetation, especially drought tolerant and native/near-native plants; rain gardens; and walking and biking infrastructure improvements. The Final EIS discusses new housing and design to encourage social interaction on pages 3.6-113-115 and under the Equity & Climate Vulnerability Considerations sections under each Alternative. Community gardens are not explicitly mentioned in the urban form chapter, but Seattle's policies (e.g., P-1.10, P 1.28) support community gardens, and the Final EIS includes a potential Parks mitigation measure to add community gardens, including on rooftops (page 3.11-80). Policies directly addressing tree canopy loss are on pages 3.3-24-35, regulations on page 3.3-27, and potential additional mitigation measures on pages 3.3-28-29, which emphasize trees on public rights-of-way and parks. See also **Section 4.2.1.2** regarding tree canopy and **Section 3.3 Plants & Animals.**
402	**Russell**	
402-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
403	**Saakian**	
403-1	Support the original abundance map, allowing for 10,000+ new dwelling units a year, 44+ neighborhood centers, and more.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3**.
404	**Saliba**	
404-1	Suggestion on potential RSL zone between Union and East Pine Streets.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
404-2	Request the Final EIS include an analysis of the trade-offs between the draft anti-displacement strategies and the quantifiable need to generate more housing, specifically the amount of	The EIS studies the Proposed Plan including the growth strategy that would see generally see RSL zoning rezoned to LR zoning as part of the Plan's implementation. The analysis considers impacts from growth anticipated by the growth strategy over the next 20 years. Additionally, the Plan contains a broad range of anti-displacement policies including policies that promote affordable

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	additional housing that could be generated if all RSL-zoned land in Centers was rezoned to LR regardless of displacement risk, if all RSL-zoned land in Centers that is not a high-displacement risk was rezoned to LR, if all RSL-zoned land in Centers that is only low-displacement risk was rezoned to LR, and if none of the RSL-zoned land in Center was rezoned to LR (No Action; identify the number of homes that would likely be demolished or renovated to create luxury homes and still result in displacement in this case).	housing, increasing community ownership, protecting low income tenants from rent increases and eviction.
405	**Sanborn**	
405-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
406	**Sanchez**	
406-1	Support for corner stores in Neighborhood Residential areas. The average annual housing production rate is too low, this will impact renters, low-income people, and people of color. Allow midrise housing and mixed uses in residential areas.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth and changes to zoning standards.
406-2	Support for expanding urban centers, new urban center at 130th, Ballard as new regional center, removing minimum parking requirements near transit, and allowing corner stores throughout Neighborhood Residential areas.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
407	**Sanders**	
407-1	Recommendations to improve the Comp Plan include; apartments allowed on all arterial with 10 minute or better bus service, apartments on all corner lots that are 50% larger than underlying zoning, improve FAR, etc.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth and changes to zoning standards.
408	**Sanford**	
408-1	Similar content as Letter 95 regarding tree canopy. Draft EIS does not address saving the 6 inch and larger diameter trees we have,	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.

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	too vague about the actual projected tree loss.	
409	**Sargent**	
409-1	Disappointed to see the Plan with the potential rezone around the 145th street station removed. Want to see similar taller projects being built in Shoreline, on the Seattle side. Seattle desperately needs more housing, especially close to light rail and upzoning along these busier arterial and close to transportation makes great sense.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
410	**Saxton**	
410-1	Study impacts of citywide elimination of parking minimums, expanded high-rise zoning within half mile of all light rail stations, parks, grocery stores, and floor area ration bonuses. Prefer Alternative 5.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding changes to zoning standards, capacity near parks, and parking minimums.
411	**Scanlon**	
411-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
412	**Scarlett 1**	
412-1	Define what affordability at all levels means.	See Response to Comment 44-1.
413	**Scarlett 2**	
413-1	Questions about Resolution 31870 to study South Park for designation criteria as an urban village. Concern that this study was never completed, yet South Park will be upzoned.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. The One Seattle Plan reclassifies the South Park Urban Village as a neighborhood center. The South Park Neighborhood Center encompasses a smaller geography than the previous urban village boundaries. Zoning within the urban center includes a reclassification of RSL zones to LR1 zones and an increase in zoned development capacity that is consistent with a neighborhood center designation.
414	**Scarlett 3**	
414-1	South Park does not fit the urban center guidelines. Why is South Park designated an urban center?	See Response to Comment 413-1.

Number	Comment Summary	Response
415	**Scarlett 4**	
415-1	Questions about South Park – why was residential small lot applied to 2500 sq ft lots in South Park while other areas of the city are 5,000 sq ft? Developers are adding much more lot coverage than is allowed, and we are losing trees fast.	See Response to Comment 413-1 and **Section 4.2.1.2** regarding tree canopy.
416	**Scarlett 5**	
416-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
417	**Schiefer, Estelle**	
417-1	Explain in detail how you plan to maintain the current tree canopy while carrying out the comprehensive plan?	See **Section 4.2.1.2** regarding tree canopy.
418	**Schiefer, Hans**	
418-1	How will the Comp. Plan increase tree canopy in frontline communities where people have more asthma and need cleaner air?	**Section 3.2 Air Quality** includes discussion of mitigation including increasing the density of tree canopy near high-volume roadways and industrial areas to block the line-of-sight to residential uses and improved air filtration in new sensitive development such as residences, schools, daycares, and hospitals. Combined, these strategies would improve indoor air. See also **Section 4.2.1.2** regarding tree canopy.
419	**Scholes**	
419-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
420	**Schubert**	
420-1	Do not support the Green Lake rezoning. There is no infrastructure to support such a drastic increase in density. A sprawling corridor of multistory buildings will ruin the neighborhood.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
421	**Scott**	
421-1	Do not support proposal to develop District 4 as a neighborhood center (specifically intersection of NE 55th St and 40th Ave NE). Does not have sufficient business opportunities or public transit options to support high density living.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.

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422	**Scully**	
422-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
423	**Shen**	
423-1	Clarify how you will stop continued loss of tree canopy due to in-fill development in residential neighborhoods. What studies have you made showing that planting young trees will compensate for removal of mature trees during development?	See **Section 4.2.1.2** regarding tree canopy.
424	**Shettler 1**	
424-1	Is the City required to make progress toward the 30% tree canopy goal, or is it simply aspirational?	See **Section 4.2.1.2** regarding tree canopy.
425	**Shettler 2**	
425-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
426	**Shettler 3**	
426-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
427	**Siegelbaum**	
427-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
428	**Siegfriedt 1**	
428-1	Similar content as Letter 44 and 89-92. Seventeen sets of questions including affordability, housing supply, middle housing rental supply, environmental impact of tree canopy loss. Where is the definition of affordability? The HB 1110 definition should be used. What is the likelihood that this plan will result in affordable low-income housing provided by the market? Need for programs or zoning incentives for urban residential neighborhoods? How many low-income affordable	See Responses to Comments 92-1 through 92-18.

Number	Comment Summary	Response
	rentals will be built under Alternative 5?	
429	**Siegfriedt 2**	
429-1	How can the Plan recommend paying someone to move under the Tenant Relocation Assistance program as a mitigation, when it actually facilitates displacing someone? Questions regarding displacement, MHA unit production, and the "supply-side myth" that simply building more housing creates affordability defined in HB 1110.	See **Section 3.8.2** regarding lack of supply, housing affordability, and economic displacement. See also Responses to Comment 44-2 and **Section 4.2.1.1**. Note that the Preferred Alternative includes the Proposed Plan and references measures to protect low-income tenants from rent increases and eviction and preserve affordable housing.
429-2	Isn't it true that the last Comp Plan 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? 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?	See Responses to Comments 44-2, 44-6, and 44-7. Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
429-3	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? 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?	See Response to Comments 44-2 and 44-8.
429-4	The Housing Element clearly displaces trees from all new development. Where is the mitigation to prevent loss of tree canopy, by stronger enforcement	See Response to Comment 44-3 and **Section 4.2.1.2** regarding tree canopy.

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	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?	
429-5	In the Housing Appendix, shouldn't trees be shown in the idealized drawings of housing?	Urban form diagrams in the One Seattle Comprehensive Plan Final EIS have been annotated to show how trees can be accommodated. See **Section 3.6 Land Use Patterns & Urban Form**, **Exhibit 3.6-100 through Exhibit 3.6-105**.
429-6	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?	See Response to Comment 293-2 regarding impacts to existing solar panels.
430	**Sims 1**	
430-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
431	**Sims 2**	
431-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
432	**Skantze**	
432-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
433	**Smith**	
433-1	Supports Alternative 5 and request to study the impacts of social housing in every neighborhood.	Comments noted and forwarded to City decision makers. See **Section 4.2.1.3** regarding studied growth and **Section 4.2.1.1** regarding the affordable housing evaluation
434	**Speers**	
434-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
435	**Stephensen**	
435-1	Support recommendations by The Urbanist. Allow for taller buildings, incentive middle housing and	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes

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	affordable housing, remove barriers for increased density, etc.	related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.3** regarding changes to zoning standards in centers additional and/or expanded neighborhood centers, corner stores, capacity near parks, and parking minimums.
436	**Stevens**	
436-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
437	**Stiffler**	
437-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
438	**Stockwell**	
438-1	Encourage the city to plan for more types of housing, start building out housing supply. Modifications to the Plan including but not limited to; encourage transit-oriented development, increase the FAR, add back original neighborhood center, remove parking requirements.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.3** regarding changes to zoning standards in centers, additional and/or expanded neighborhood centers, corner stores, and parking minimums.
439	**Strock**	
439-1	Advocate for density	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
440	**Stutman**	
440-1	Support for Alternative 5 including development of a new Urban Cener on 130th Street. Plan is not ambitious enough; encourage more housing options. Suggested considerations include minimize or remove parking requirements and increase floor area ratios.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. See **Section 4.2.1.3** regarding changes to zoning standards in centers and parking minimums.
440-2	Broader rezone in the 130th street area; suggest extending upzones to more areas of the city.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
440-3	Consider Pastor Laura Baumgartner of the Haller Lake Methodist Church's request to allow their lot to accommodate	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes

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	both residential and commercial development	related to the One Seattle Plan will be forwarded to the decision makers.
441	**Sundquist**	
441-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
442	**Surdyke**	
442-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
443	**Swing**	
443-1	Support Alternative 2. Variation to the recommendations in Letter 95 about tree canopy protection.	Comments noted and forwarded to City decision makers. See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
444	**Talen 1**	
444-1	Support adding more housing in all neighborhoods, planning for more growth, and developing the city in a more sustainable, equity way. The city did not listen to the overwhelming majority's call for an Alternative 6 vision. In Capitol Hill in particular, I think the Plan should allow high-rise apartments.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.3** regarding studied growth. Under the Preferred Alternative, a variety of housing is allowed in the First Hill/Capitol Hill Regional Center, including high-rise multifamily development in areas closest to Downtown.
445	**Talen 2**	
445-1	Study impacts of expanded high-rise zoning in Urban Neighborhoods within 1 mile of parks. Support for Alternative 5.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding changes to zoning standards in centers and capacity near parks.
446	**Taylor, Patrick**	
446-1	Same content as Letter 18, including concern the alternatives are not being ambitious enough for increased density and housing. Additionally, Seattle should prioritize proximity-based strategies over mobility-based ones. Additional comment on prioritizing transmutation mode shift towards active mobility options over automobile electrification.	See Responses to Comments 18-1 through 18-10.
447	**Taylor Sarah**	
447-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.

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448	**Tenhoff-Barton**	
448-1	Not enough protection for trees. What are the mitigation strategies for loss of trees?	See **Section 4.2.1.2** regarding tree canopy.
448-2	Questions around what is considered affordable housing for middle class families, and how the plan provide for seniors.	See Response to Comment 44-1 regarding affordable housing definition and Response to Comment 44-8 regarding housing for seniors. See also **Section 4.2.1.1** regarding the affordable housing evaluation.
449	**Thiessen**	
449-1	Study the impacts of higher floor area ratios for middle housing in all residential zones. Support Alternative 5 with higher growth targets.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding changes to zoning standards.
450	**Thomas, Robin**	
450-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
451	**Thomas, Toby**	
451-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
452	**Toms**	
452-1	Support for Alternative 5.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
453	**Toohey**	
453-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
454	**Travis**	
454-1	Study impacts of higher density in all residential zones, and impact on housing affordability. Supports Alternative 5.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth and changes to zoning standards.
455	**Trecha**	
455-1	Support for removing parking minimums from every residential zone in the city, and increased density in all neighborhoods.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.

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		See also **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, and parking minimums.
456	**Tully**	
456-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
457	**Ullmann**	
457-1	Support for corner stores, small businesses and small apartment buildings in neighborhoods. Concern on lack of transit in the Maple Leaf neighborhood and the neighborhood's neighborhood center designation. Recommendation to re-site Maple Leaf's neighborhood center near Lake City Way and NE 80th St, closer to Northgate, rather than NE 90th St and Roosevelt Way, modify the circumference to a ¼-block on non-arterials, and limit density beyond a ¼-block on non-arterials.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
457-2	Request to reconsider requiring development to take part in the MHA program, analyze source/supply/demand/affordability over time, and encourage social housing. The Draft EIS 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?	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See Response to Comment 44-2 and **Section 4.2.1.1** regarding the affordable housing evaluation.
457-3	Site neighborhood centersnear transit hubs, address transportation needs of older adults, and mandate parking in residential redevelopment—question the belief that most people do not need cars or off-street parking.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. The City coordinates with Metro regarding transit service in the city.
457-4	Support the city's aspiration to achieve a 30% tree canopy, and note that coverage has shrunk in recent years. Believe more analysis of the effect of development on the tree canopy is needed for each proposed neighborhood center, and	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. Please see **Section 4.2.1.2** for responses to comments in Letters 83 and 95, concerning the process for identifying significant

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	that the Draft EIS includes statements that either are irrelevant or not supported by facts. Request guaranteed protections for large trees, to evaluate projected canopy loss for each neighborhood center, to define the time needed for newly planted trees to achieve benefits of mature trees, and to remove irrelevant and unsupported assumptions.	adverse impacts. Analyses in the EIS are consistent with SEPA requirements for programmatic, non-project reviews, per WAC 197-11-442. The analyses in the EIS have been expanded to address the potential for temporal loss (i.e., time lag between the loss of functions provided by removed trees and the replacement those functions by planted trees) of the essential benefits provided by tree canopy cover. Analyses in the EIS are not based on the assumption that the City of Seattle can exercise control over planning decisions made by other jurisdictions. Statements about the potential for reducing development pressure in outlying areas are consistent with the GMA goals of encouraging development in urban areas and reducing urban sprawl.
458	**Urban**	
458-1	Support the Housing Abundance Map, we need an ambitious plan to handle the housing crisis and cost of living crisis that go with a lack of housing.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.3** regarding studied growth.
459	**Valett**	
459-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
460	**Van Bronkhorst**	
460-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
461	**Villasana**	
461-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
462	**Vitz-Wong**	
462-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
463	**VonVeh**	
463-1	Concern on increased density in single-family neighborhoods, including need for Comprehensive Plan to address services to support growth, impacts to tree canopy, and impacts from ferry related traffic in West Seattle.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.2** and Response to Letter 44 regarding tree canopy. See **Section 3.10 Transportation** regarding transit including ferries. Travel Times on corridors including those in West Seattle are addressed. The EIS uses a travel demand model accounting for existing and expected growth in the region.

Number	Comment Summary	Response
464	**Wada**	
464-1	Support recommendations that Birds Connect Seattle submitted. City leaders must be less focused on developers, and care more about the natural greenery.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See Responses to Comment 20-1 through 20-6 and **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
465	**Wade**	
465-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
466	**Wagner 1**	
466-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
467	**Wanger 2**	
467-1	Resent Letter 466	See Response to Comment 466-1.
468	**Waldman**	
468-1	Concern for tree canopy- no more million-dollar developments with 2 dollar trees.	See **Section 4.2.1.2** regarding tree canopy.
469	**Wall**	
469-1	Why does the City use the 30% standard for considering cost-burden and what has the City done to adopt this in any official way? Concerns related to housing affordability and question the net growth in housing and jobs by alternative reported in the Housing Appendix. No Action 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 0-50% AMI? Final EIS should include an estimate of the net new housing	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.1** regarding the affordable housing evaluation.

Number	Comment Summary	Response
	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.	
469-2	Does not agree with Draft EIS claim that existing regulations are adequate to mitigate all environmental impacts 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? Draft EIS does not address the socio-economic impacts of the Growth Strategy, including household costs, cost-of-living, and displacement risk. Final EIS should include an analysis of the public costs for infrastructure (parks, transportation, energy, drainage, wastewater, solid waste) to meet growth demands.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See Responses to Comments 132-2, 164-3 and 404-2 regarding displacement. **Section 3.1** of the Draft and Final EIS provides an analysis of the potential impacts to earth and water quality. **Section 3.1.2** analyzes the potential impacts associated with each alternative and finds that there are no significant unavoidable adverse impacts. **Section 3.3** of the Draft and Final EIS provides an analysis of the potential impacts to plants and animals, including tree canopy. **Section 3.3.2** analyzes the potential impacts associated with each alternative and finds that there would be no significant, unavoidable adverse impacts on tree canopy. **Section 3.2** of the Draft and Final EIS provides an analysis of the potential impacts to air quality and greenhouse gas emissions. **Section 3.2.2** analyzes the potential impacts associated with each alternative and finds that there are no significant adverse impacts. **Section 3.4** of the Draft and Final EIS provides an analysis of potential impacts related to energy and natural resources. **Section 3.4.2** analyzes each alternative for potential impacts and finds there are no significant adverse impacts. **Section 3.11** of the Draft and Final EIS provides an analysis of potential impacts related to public safety. **Section 3.11.2** analyzes each alternative for potential impacts and finds that for fire/emergency services, parks, schools, and solid waste there are no significant adverse impacts. For police, with investment in mitigation measures will provide adequate services for future population growth. SEPA does not require cost-benefit or economic analysis (WAC 197-11-448 and 450). See **Section 4.2.1.4**.
469-3	Area 1 is described as having significant drainage and wastewater deficits yet is targeted for the greatest percentage of new housing under two of the alternatives despite the upgrades to accommodate this growth being	The EIS acknowledges the potential conflict of adding additional population to Area 1 due to infrastructure constraints. However, there are broad areas within Area 1 that would have sufficient drainage and wastewater capacity to accommodate new households. Seattle City Light used the addition of 65,000 housing units by 2030 in its study on the impacts of electrification; it was not meant to indicate a targeted or planned growth. The growth assumptions of the alternatives go farther out then 2030 to 2044.

Number	Comment Summary	Response
	called 'cost prohibitive.' Please explain. In the section on electrical power, the Draft EIS 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.	The EIS acknowledges that upgrades to existing infrastructure will need to be made to support electrification. As noted under **Section 3.11.3**, Other Potential Mitigation Measures Seattle City Light regularly plans and adapts to changing growth patterns and are currently engaged in efforts to address electrical demand. For example, Seattle City Light has an Integrated Resource Plan (IRP) designed to prepare for future energy demands and sustainability and reliability.[105]
469-4	Draft EIS 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.	Regarding cumulative impacts, please see Response to Comment 26-2.
470	**Ward, Galen**	
470-1	Support adding family-sized apartment buildings throughout Seattle. Increase FAR and height for 4- and 6-plexes, building in neighborhood centers should be taller and boundaries should expand a quarter of a mile more, add back the original neighborhood centers.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.3** regarding studied growth, changes to zoning standards in centers, and additional and/or expanded neighborhood centers. See also Responses to Comments 12-2, 44-6, and 132-2.
471	**Ward, Sarah**	
471-1	Same content as Letter 470.	See Response to Comment 470-1.
472	**Warsinske 1**	
472-1	Concern that increased density may lead to increased crime rates.	Comment noted. This comment is beyond the scope of environmental review of the One Seattle Plan so no response is necessary. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. Please also see **Section 3.11 Public Services** which addresses police services, including mitigation measures in **Section 3.11.3**.
473	**Warsinske 2**	
473-1	Concerns related to higher density, affordability, design, and tree canopy. Why are already crowded neighborhoods on the high density plans? Why aren't wealthier,	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision

[105] See: https://powerlines.seattle.gov/2024/08/14/how-seattle-city-light-is-planning-for-increasing-energy-demands/.

Number	Comment Summary	Response
	roomier neighborhoods being considered for urban centers/neighborhoods? Why are developers allowed to construct multiple houses on one lot with no concern regarding the negative effect on our neighborhoods? Architecturally these high density houses are a blight on any neighborhood.	makers. See **Section 4.2.1.1** regarding the affordable housing evaluation and **Section 4.2.1.2** regarding tree canopy.
474	**Wartman**	
474-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
475	**Weatherford**	
475-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
476	**Webster 1**	
476-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
477	**Webster 2**	
477-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
478	**Weinstein, Paul**	
478-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
479	**Weinstein Colleen**	
479-1	Similar content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for Response to Letter 83 and similar regarding plants, animals, and tree canopy.
480	**Weissman, Jeff**	
480-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
481	**Weissman, Maggie 1**	
481-1	Similar mitigation recommendations as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
482	**Weissman, Maggie 2**	
482-1	Similar mitigation recommendations as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.

Number	Comment Summary	Response
483	**Westgard**	
483-1	Similar content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
484	**Wheeler 1**	
484-1	Protecting mature trees and remaining native plant landscape is key. Concern, questions, and disappointment with current practices around tree canopy, plants, and wildlife populations. There is no data or citation in the Draft EIS that concluded there will be no environmental impact to urban wildlife populations after adding 100,000 housing units.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** regarding plants, animals, and tree canopy.
485	**Wheeler 2**	
485	Same content as Letter 484.	See Response to Comment 484-1.
486	**Williams, Bonnie 1**	
486-1	Preference for the No Action Alternative because HB 1110 is a required upzone and should be considered as an alternative.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers.
487	**Williams, Bonnie 2**	
487-1	Similar content as Letter 95, regarding tree canopy, air quality, and plants and animals. Concern about construction and transportation noise. Land use and urban design concerns about privacy, views, and heat islands. Housing mitigation in form of MHA fees to provide more housing is desired. Cultural resources, agree with additional funding for historic surveys and modifying demolition review process. Transportation considerations include safety and east-west connectivity, prioritize cars but	**Plants, Animals, and Tree Canopy:** See **Section 4.2.1.2** for responses regarding plants, animals, and tree canopy. **Air Quality**: The commenter's concerns regarding the loss of trees during wildfire are noted. **Section 3.2 Air Quality**, includes mitigation to increase tree canopies to shield residential uses from high-volume roadways and industrial uses. **Energy**: The commenter's concerns regarding the cost to convert existing homes to electric are noted. Seattle City Light addresses several incentive programs for energy rebates, energy efficiency, and heating and cooling.[106] Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. **Noise**: The commenter expresses concerns regarding construction noise. **Section 3.5 Noise**, includes measures to reduce construction-related noise including the installation of barriers to shield noise-sensitive uses, selecting haul routes to avoid noise sensitive areas, using mufflers, low-noise emission equipment, and ongoing monitoring of noise levels.

[106] See: https://seattle.gov/city-light/residential-services/home-energy-solutions.

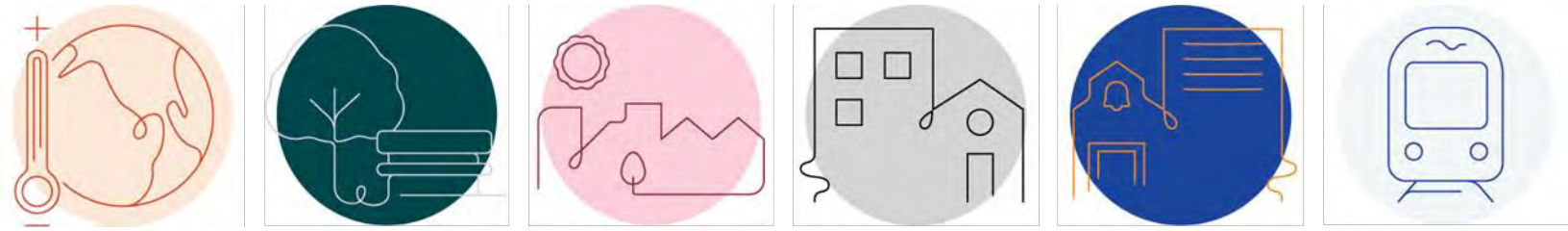
Number	Comment Summary	Response
	improve all modes, maintain Aurora as a priority. Public services priorities include police and fire. Parks are overcrowded. Housing needs green space. Don't make green streets permanent in Wallingford and Phinney. Require developer fees for utilities.	**Land Use:** Please see **Section 3.6** which addresses urban form including but not limited to views and heat islands. **Housing:** See mitigation measures in **Section 3.8** which describes MHA. **Cultural Resources:** Agreement with some potential mitigation measures in **Section 3.9.3** is noted and forwarded to City decision makers. **Transportation:** Preferences for improvements and priorities are noted and forwarded to City decision makers. All modes are addressed in **Section 3.10** including mitigation measures in **Section 3.10.3**. **Public Services:** See **Section 3.11** for an evaluation of police, fire, and parks. See also a discussion of the City's parks plans in **Section 4.2.1.3**. **Utilities:** Service providers address requirements to extend services for new development consistent with City regulations and system plans. For a list of regulations and commitments, see **Section 3.12.3**.
488	**Williams, Charles**	
488-1	Support Alternative 2, as it will preserve the most canopy cover and limit the removal of established trees. Saying that none of the action alternatives would have significant adverse impacts on tree canopy is not backed up by facts. The new tree protection ordinance increases potential for tree removal and loss.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** regarding tree canopy.
489	**Williams, Pamela**	
489-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
490	**Williams, Tony**	
490-1	Same content as question 1 through 9 in Letters 44 and 89-92. Includes questions on affordability, housing supply, middle housing rental supply, and environmental impact of tree canopy loss.	See Responses to Comments 44-1 through 44-3.
491	**Wilmot**	
491-1	Same content as Letter 83 regarding plants, animals, and tree canopy.	See **Section 4.2.1.2** for response to Comment 83 and similar regarding plants, animals, and tree canopy.
492	**Wineman**	
492-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.

Number	Comment Summary	Response
493	**Winkle**	
493-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
494	**Wollett**	
494-1	Support Alternative 2 because it allows for the most tree and plant habitat while pursuing reasonable growth and density.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See **Section 4.2.1.2** regarding plants and tree canopy.
495	**Woo**	
495-1	Study the impacts of citywide elimination of parking minimums. Supports Alternative 5.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See Response to Comment 18-9 regarding parking.
496	**Wu**	
496-1	Questions and suggestions on GHG calculations and models of emission sources. Section 3.2.2 and Appendix D inquiry on accuracy of MOVES modeling framework. Suggestion to study impacts of FHFs as an accumulative pollutant.	The commenter erroneously claims that the greenhouse gas emissions analysis scales population data to derive the inputs of VMT data. VMT data was generated utilizing the Puget Sound Regional Council regional travel demand model, SoundCast. The model covers the four-county region of King, Kitsap, Snohomish, and Pierce counties. SoundCast is an activity-based model which estimates travel behavior across the region based on characteristics of individual persons and their households. The model produces detailed trip diaries for each simulated person in the region throughout an average weekday tracking the departure time, starting location, ending location, travel mode, and any other people sharing that trip. Non-default inputs for average speed distribution, source type populations, and road type distribution was taken from the 2017 Washington Comprehensive Emissions Inventory Technical Support Document. And do remain constant for all alternatives as speed limits and road conditions are not anticipated to differ between alternatives. Alternative 1 results in the lowest transportation-related GHG emissions because Alternative 1 is projected to result in the lowest VMT when compared to the other action alternatives which assume additional growth. Despite the increase in total VMT, the VMT per capita (per Seattle resident and employee) would be lower with the action alternatives than with Alternative 1, No Action. As discussed in EIS **Section 3.2 Air Quality& GHG Emissions**, climate change is a global issue and impacts from any singular development project or programmatic action, including the Comprehensive Plan update, would not have an individually discernible impact on global climate change. Thus, the EIS studied the impact of GHGs as a cumulative pollutant.

Number	Comment Summary	Response
497	**Young**	
497-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for response to Comment 95 and similar regarding tree canopy.
498	**Zemke 1**	
498-1	Request to add 3 recent Seattle polls about the importance of trees and urban forest.	Comment noted. Suggestion for policy changes are outside the scope of the environmental analysis for the One Seattle Plan and alternatives so no response is required. Desired policy changes related to the One Seattle Plan will be forwarded to the decision makers. See also **Section 4.2.1.2** regarding tree canopy.
499	**Zemke 2**	
499-1	Concern and questions about analysis of plants and animals and tree canopy.	See **Section 4.2.1.2** regarding plants, animals, and tree canopy.
500	**Zemke 3**	
.	Series of questions recommendations about tree canopy and urban forest.	See **Section 4.2.1.2** for Responses to Letter 500.
501	**Zemke 4**	
501-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
502	**Zemke 5**	
502-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
503	**Zubia**	
503-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.
504	**Zuluaga**	
504-1	Same content as Letter 95, regarding tree canopy.	See **Section 4.2.1.2** for Response to Letter 95 and similar regarding tree canopy.

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5 ACRONYMS & REFERENCES





Source: City of Seattle, 2023.

5.1 Acronyms

ADA	Americans with Disabilities Act
ALS	Advance Life Support
ARAR	Applicable or Relevant and Appropriate Requirements
ARPA	Archaeological Resources Protection Act
BINMIC	Ballard Interbay Northend MIC
BIRT	Ballard-Interbay Regional Transportation
BLS	Basic Life Support
BMP	Bicycle Master Plan
BMPs	Best Management Practices
BNSF	Burlington Northern Santa Fe
BPSA	Bicycle and Pedestrian Safety Analysis
BRT	Bus Rapid Transit
BSO	Buildings, Structures, Objects
BTU	British Thermal Unit
CAPCOA	California Air Pollution Control Officers Association
CARA	Critical Aquifer Recharge Area
CIP	Capital Improvement Program
CPPs	King Countywide Planning Policies
CPSC	Community Partners Steering Committee
CRPP	Cultural Resource Protection Plan
CSO	Combined Sewer Overflow
CTR	Commute Trip Reduction
CWA	Clean Water Act
DAHP	Washington State Department of Archaeology and Historic Preservation
dB	Decibel
dBA	A-weighted Sound Level
DNL	Day-Night Average Sound Level (see also L_{dn})
DNRP	Department of Natural Resources and Parks
DSL	Digital Subscriber Line
EA	Environmental Assessment
EDNA	Environmental Designation for Noise Abatement
EEI	Equity and Environment Initiative
EHD	Environmental Health Disparities
EIS	Environmental Impact Statement
EMS	Emergency Medical Services
EPA	U.S. Environmental Protection Agency
FHWA	Federal Highway Administration
FMP	Freight Master Plan
FTA	Federal Transit Administration
GHG	Greenhouse Gas

GLO	General Land Office
GMA	Growth Management Act
GMPC	King County Growth Management Planning Council
HBMS	Hazardous Building Material Survey
HBMS	Hazardous Building Material Surveys
HCM	Highway Capacity Manual
HPI	Historic Property Inventory
HPP	King County Historic Preservation Program
HUD	U.S. Department of Housing and Urban Development
HVAC	Heating, Ventilation, and Air Conditioning
IDDE	Illicit discharge detection and elimination
II	Industry and Innovation
ITS	Intelligent Transportation Systems
KCSWDM	King County Surface Water Design Manual
L_{dn}	Day-Night Average Sound Level (see also DNL)
LEED	Leadership in Energy and Environmental Design
L_{eq}	Equivalent Noise Level
L_{max}	Maximum Noise Level
LOS	Level of Service
LTCP	Long-term Control Plan
MCPP	Micro-Community Policing Plans
mgd	Million Gallons per Day
MIC	Manufacturing and Industrial Center
MMDF	Maximum Month Design Flow
MML	Maritime, Manufacturing, and Logistics
MPD	Multiple Property Documentation
MPH	Miles per Hour
MSATs	Mobile Source Air Toxics
MTCA	Model Toxics Control Act
MW NHA	Maritime Washington National Heritage Area
NAAQS	National Ambient Air Quality Standards
NAC	Noise Abatement Criteria
NDS	Natural Drainage Systems
NEC	National Electric Code
NEPA	National Environmental Protection Act
NHL	National Historic Landmarks
NHPA	National Historic Preservation Act
NMFS	National Marine Fisheries Service
NOAA	National Oceanic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NTHP	National Trust for Historic Preservation
NWI	National Wetlands Inventory

OPCD	Seattle Office of Planning and Community Development
OSE	Seattle Office of Sustainability and Environment
PMP	Pedestrian Master Plan
POS Plan	Parks and Open Space Plan
POSPD	Port of Seattle Police Department
PPV	Peak Particle Velocity
PSCAA	Puget Sound Clean Air Agency
PSRC	Puget Sound Regional Council
RCO	Recreation Conservation Office
RCW	Revised Code of Washington
RGC	Regional Growth Center
RMP	Risk Management Plan
RMS	Root Mean Square
RPZ	Residential Parking Zone
SCL	Seattle City Light
SCWQP	Ship Canal Water Quality Project
SDOT	Seattle Department of Transportation
SEPA	State Environmental Policy Act
SFD	Seattle Fire Department
SL	Seattle Landmarks
SLS	Seattle Library System
SMC	Seattle Municipal Code
SMP	Shoreline Master Program
SOV	Single Occupancy Vehicle
SPD	Seattle Police Department
SPR	Seattle Parks and Recreation
SPS	Seattle Public Schools
SPU	Seattle Public Utilities
SR	State Route
STC	Sound Transmission Class
STP	Seattle Transportation Plan
SWMP	Stormwater Management Program
TCP	Traditional Cultural Properties
TDM	Travel Demand Management
TMA	Transportation Management Association
TMDL	Total Maximum Daily Load
TMP	Transit Master Plan
TMP	Transportation Management Program
TSA	Transportation Security Administration
TSMO	Transportation Systems Management and Operations
UI	Urban Industrial
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey

USSG	U.S. Surveyor General
V/C	Volume to Capacity
VdB	Vibration Velocity Level
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds
WAC	Washington Administrative Code
WHBR	Washington Heritage Barn Register
WHR	Washington Heritage Register
WISAARD	Washington Information System for Architectural and Archaeological Records Data
WOTUS	Waters of the United States
WQ	Water Quality
WRIA	Water Resource Inventory Area
WSBLE	West Seattle and Ballard Link Extension
WSDOT	Washington State Department of Transportation
WTD	Wastewater Treatment Division
WTHP	Washington Trust for Historic Preservation
WWTP	Wastewater Treatment Plant

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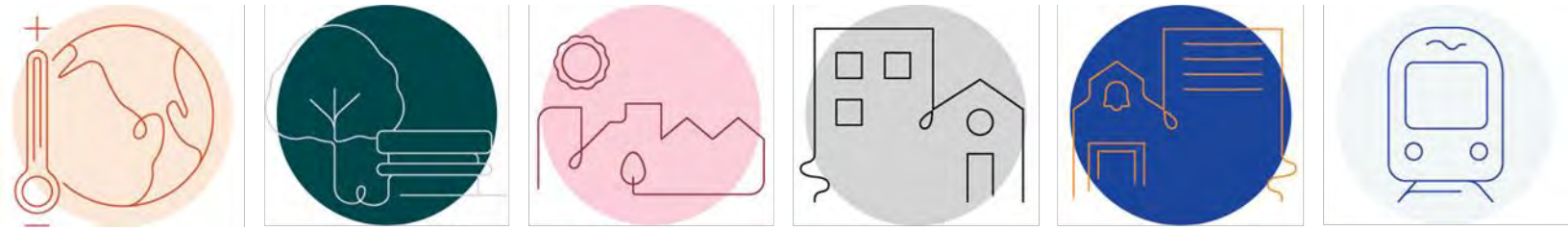
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Source: City of Seattle, 2023.

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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

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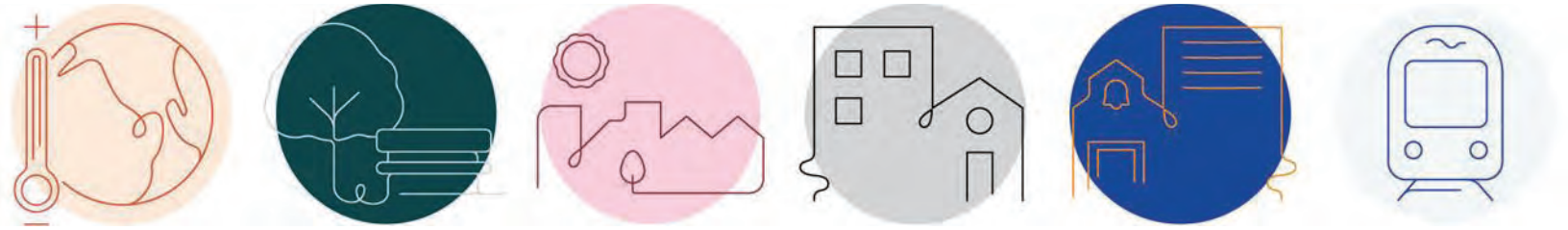
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B Detailed Estimated Growth by Alternative

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	
Alternative 1	**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**
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
Total	**13,752**	**11,900**	**12,794**	**10,881**	**6,018**	**10,534**	**19,413**	**90,733**	**13,254**	**4,692**	**6,179**	**5,054**	**1,929**	**14,569**	**6,661**	**9,637**	**80,000**	**158,000**
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	
Alternative 2	**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**
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
Total	**18,368**	**12,506**	**18,264**	**11,697**	**8,069**	**10,829**	**19,413**	**88,011**	**16,331**	**5,194**	**9,427**	**5,581**	**2,271**	**14,585**	**7,857**	**9,597**	**100,000**	**158,000**
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	
Alternative 3	**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**
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
Total	**17,567**	**12,290**	**20,206**	**10,830**	**6,714**	**10,424**	**19,413**	**88,011**	**13,759**	**4,823**	**10,177**	**4,980**	**1,947**	**14,515**	**10,217**	**12,127**	**100,000**	**158,000**
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%**		

HU = Housing Unit

	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	
Alternative 4	**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**
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
Total	**17,201**	**12,742**	**21,041**	**10,898**	**6,638**	**10,414**	**19,413**	**88,011**	**13,807**	**4,992**	**10,061**	**5,011**	**1,958**	**14,515**	**9,881**	**11,417**	**100,000**	**158,000**
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	
Alternative 5	**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**
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
Total	**21,498**	**12,536**	**23,557**	**11,318**	**8,167**	**10,599**	**19,413**	**86,196**	**16,101**	**5,048**	**13,748**	**5,588**	**3,636**	**14,770**	**13,880**	**11,945**	**120,000**	**158,000**
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	
Preferred Alternative	**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**
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
Total	**25,670**	**12,085**	**23,515**	**10,590**	**8,975**	**10,915**	**19,125**	**85,985**	**17,640**	**4,565**	**12,765**	**6,140**	**1,615**	**16,010**	**10,695**	**11,710**	**120,000**	**158,000**
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%**		

HU = Housing Unit, UC = Urban Center, HUV = Hub Urban Village, RUV = Residential Urban Village, MIC = Manufacturing Industrial Center

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	130th 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

HU = Housing Unit, UC = Urban Center, HUV = Hub Urban Village, RUV = Residential Urban Village, MIC = Manufacturing Industrial Center

Total Housing Units and Jobs by Alternative

		Total Housing Units								Total Jobs							
Alt 1 Type	Name	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	130th 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	23rd & 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

HU = Housing Unit, UC = Urban Center, HUV = Hub Urban Village, RUV = Residential Urban Village, MIC = Manufacturing Industrial Center

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
Single family residential	4	4	4
Multifamily residential	4	NR, RSL, I: 4 MPC-YT: 30 Downtown: 250 LR, NC, C, MR, HR, SM: 200	NR, RSL, I: 4 All others: 20
Office, school, commercial (square feet) w/parking or stand-alone parking lot	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.

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:

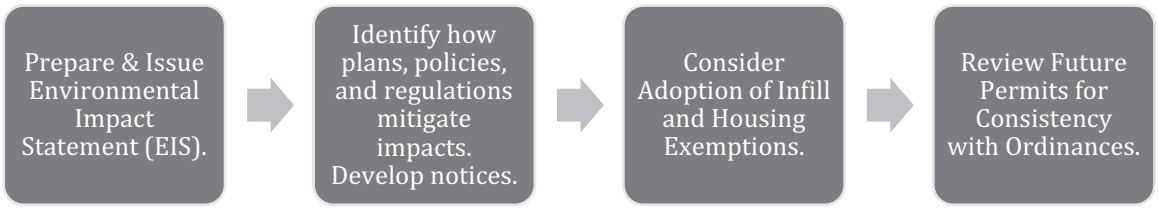
- the development is consistent with all development regulations;
- the development is consistent with the proposed use or density and intensity of use in the designated infill area;
- the EIS prepared for the exemption analyzes multimodal transportation impacts, including impacts to neighboring jurisdictions, 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[1]

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

[1] Infill development—Categorical exemptions from chapter: https://app.leg.wa.gov/RCW/default.aspx?cite=43.21C.229&pdf=true as amended https://lawfilesext.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

- 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 impacts, 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

- 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

- 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

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

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
Housing	80,000	100,000	100,000	100,000	120,000	120,000
Jobs	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).

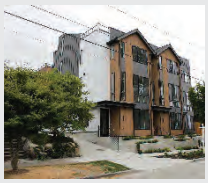


Detached Accessory Dwelling Unit (DADU)
A second unit added to a residential lot, usually behind the main house.



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



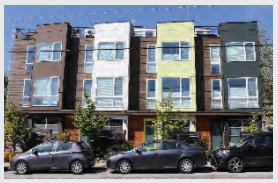




Courtyard Housing
Attached homes of 2-3 stories arranged around a shared open space.



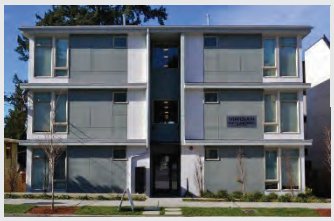

Duplex & Triplex (side-by-side)
Two or three units that share walls with one another.




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.)

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
Title 22 - BUILDING AND CONSTRUCTION CODES	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
Title 23 - LAND USE CODE **Subtitle I - General Provisions** **Subtitle II - Platting Requirements** **Subtitle III - Land Use Regulations** **Subtitle IV - Administration**	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
Title 25 - ENVIRONMENTAL PROTECTION AND HISTORIC PRESERVATION	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
Earth and Water Quality			
	Coastal Zone Management Act	16 USC 1451 et seq.	Goal is to preserve, protect, develop, and where possible, to restore or enhance the resources of the nation's coastal zone.
	Shoreline Management Act	▪ RCW 90.58 ▪ WAC 173-26	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	SMC 23.60A	
	National Flood Insurance Act of 1968	The Federal Emergency Management Agency (FEMA)	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. Restricts building in floodways, and allows construction in floodplain provided standards for floodproofing are addressed.
	Flood Disaster Protection Act of 1973	42 USC 4001 et seq.	
	Floodplain Management Presidential Executive Order 11988	FEMA	
	Flood Control Management Act	RCW 86	

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
	Floodplain Development	SMC 25.06	
	Critical Areas Ordinance ▪ SMC 25.09.080—Landslide-Prone Areas ▪ SMC 25.09.090—Steep Slope Erosion Hazard Areas ▪ SMC 25.09.100—Liquefaction-Prone Areas ▪ SMC 25.09.110—Peat Settlement-Prone Areas ▪ SMC 25.09.160—Wetlands and Wetland Buffers ▪ SMC 25.09.200—Fish and Wildlife Habitat Conservation Areas SMC 25.09.220—Abandoned Landfills	SMC 25.09	▪ Protects functions and values of critical areas . ▪ Protects life and property from hazards. ▪ Protects water quality (erosion, wetlands, riparian regulations)
	Stormwater Code and Manual	SMC Title 22, Subtitle VIII See Sections 22.800 to 22.808	▪ Stormwater, Grading & Drainage ordinances include environmental & water quality protections, to meet applicable State guidance that includes Ecology's Stormwater Management Manual.
	Stormwater Management Manual for Western Washington (Ecology Manual)	Department of Ecology	
	Washington State Department of Transportation (WSDOT) Highway Runoff Manual	Washington State Department of Transportation	
	Water Quality Standards for Surface Waters	WAC 173-201A	▪ Designated water uses and criteria.
	Water Quality Standards for Groundwater	WAC 173-200	▪ Maintain the highest quality of the state's groundwaters and protect existing and future beneficial uses of the groundwater.
	Water Pollution Control Act	RCW 90.48	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
	National Pollutant Discharge Elimination System (NPDES) Construction Stormwater General Permit	Department of Ecology	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	Hydraulics Manual	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. 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.
	Washington State Hydraulic Code	WAC 220-660	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: ▪ 401—Water Quality Certification ▪ 402—National Pollutant Discharge Elimination System ▪ 404—Permits for Dredge or Fill	USC 1251 et seq.	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	33 USC 408	Protects navigable waters in the development of harbors and other construction and excavation.
	Safe Drinking Water Act See Chapter 6A	42 USC 300f et seq.	Protect the quality of drinking water in the U.S.
Air Quality			
	National Ambient Air Quality Standards (NAAQS)		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.
	Washington State Department of Ecology Rules		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.
	Puget Sound Clean Air Agency Rules		Regulates a range of businesses and industries and construction to meet air standards.

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
	Washington State Energy Code	SMC Chapter 22.101 - Adoption of Construction Codes	Regulates the energy-use features of new and remodeled buildings. Seattle is planning to adopt the 2021 energy code in 2024.
	Seattle Climate Action Plan and Strategies		A set of short- and long-term actions to reduce contributors of greenhouse gases, particularly transportation and buildings.
	Seattle Energy Benchmarking Law	SMC 22.920	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.
	Seattle Transportation Electrification Blueprint		Consists of a series of initial steps Seattle is committed to reducing climate pollution in the transportation sector.
Plants and Animals			
	Environmentally Critical Areas Ordinance	SMC 25.09	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	SMC 23.60A	Regulates activities in and near major water bodies (e.g., rivers, large lakes, marine waters), establishes requirements for maintaining native vegetation.
	Tree Protection Ordinance	SMC 25.11	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	Section 401	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	Section 404	Requires authorization for excavating, land clearing, or discharging dredged or fill material into waters of the United States, including wetlands
	Migratory Bird Treaty Act	16 U.S.C. 703-712	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	16 U.S.C. 668-668d	Prohibits the taking (including disturbance) of eagles or their nests, except as authorized by USFWS.
	Marine Mammal Protection Act	16 USC Ch. 31	Prohibits injury or harm (including disturbance) to marine mammals, except as authorized by National Marine Fisheries Service (NMFS).
	Endangered Species Act	Section 7 Consultation	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 conducing citywide tree cover assessment every 5 years
Energy and Natural Resources			
	Washington State Energy Code	SMC Chapter 22.101 - Adoption of Construction Codes	Regulates the energy-use features of new and remodeled buildings. Seattle is planning to adopt the 2021 energy code in 2024.
	Seattle Energy Benchmarking Law	SMC 22.920	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	SMC 22.930	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)	Legislation	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.
Noise			
	City of Seattle Noise Control Ordinance	SMC Chapter 25.08	Sets exterior sound level limits between residential, commercial, and industrial uses.
Land Use Patterns and Urban Form / Relationship to Plans, Policies, and Regulations			
	Seattle Design Review Program	SMC Chapter 23.41	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	SMC Title 23, Subtitle III	Regulates land uses, scale, density, access, landscaping, signage, light and glare, views, parking and more.
	Streets Illustrated, Seattle's Right-of-Way Improvements Manual		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
	Green Building Incentives	SMC Title 23	▪ 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. ▪ Green Building Standard: Gives additional development capacity in specific zones in exchange for meeting green building requirements. ▪ 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. ▪ 2030 Challenge: Offers additional height, FAR, and Design Review departure requests for projects that meet the 2030 Challenge.
	Sustainable Buildings and Sites Policy		The Policy sets the following goals for City-owned properties: ▪ New construction and major renovations 5,000 ft2 or greater must meet LEED Gold as well as key performance requirements for energy and water efficiency, waste diversion, and bicycle facilities. ▪ Tenant Improvements 5,000 ft2 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. ▪ 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. ▪ All new and existing sites projects shall follow best management practices.

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
Population, Housing, and Employment			
	Mandatory Housing Affordability (MHA) Program	Chapter 23.58c	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 Program	Chapter 5.72	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)	SHL Program	Helps fund the production and protection of affordable units. Voters approved the $970 Million Housing Levy renewal in 2023. 2023 Levy Fact Sheet.
	Rental Housing Program		The Rental Housing Program funds the development of affordable rental housing in Seattle using local funds such as the Seattle Housing Levy, federal funds, and other fund sources.
	Homeownership Program		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.
	Home Repair Program		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.
	The Weatherization Program		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. 2023 Income Limits.

EIS Topic	Applicable Regulation	Code Citation	Notes/Comments
	Just Cause Eviction Ordinance	▪ SMC 22.205 - Seattle Just Cause Eviction Ordinance ▪ RCW 59.18.200; SMC 7.24.030 - Renewal of Term Leases	The Just Cause Eviction Ordinance, passed in 1980, prevents landlords from arbitrarily ending a rental agreement. 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.
	The Tenant Relocation Assistance Ordinance (TRAO)	Tenant Relocation Assistance Ordinance, SMC 22.210.	The Tenant Relocation Assistance Ordinance has two primary benefits for renters being displaced by development: ▪ Provide relocation assistance to low-income households ▪ Provide all households with adequate time to search for new housing and move
	Economic Displacement Relocation Assistance (EDRA)	Ord 126451	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.
	Washington State Residential Landlord-Tenant Act	RCW 59.18	Establishes rights and responsibilities for tenants and landlords
	Equitable Development Initiative (EDI)		$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.
	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
Cultural Resources			
	City of Seattle Historic Preservation Program	SMC 25.12 through 25.30	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).
	Washington Executive 21-02		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	RCW 27.53	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	25-46 WAC	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)	36 CFR Part 800	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.
	Archaeological Resources Protection Act (ARPA)		Protects archaeological resources.
	National American Graves Protection and Repatriation Act (NAGPRA)		Creates protections for Native American burial sites, remains, and cultural objects.
	The National Environmental Protection Act		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.
Transportation			
	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	SMC 14.30	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.
	Commute Trip Reduction	Chapter 25.02 - Commute Trip Reduction	An employer of 100+ employees who report to work at a single site between 6 - 9 a.m. must: ▪ Appoint and maintain an individual to act as an Employee Transportation Coordinator. ▪ Submit a program report to the City for review and approval once every two years. ▪ Exercise a good faith effort by collaborating with the City in its administration and implementation of the law. ▪ Conduct a commuter survey once every two years to measure employees' drive alone rates.
	Pedestrian and Bicycle System Improvements		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
	Transportation systems management and operations (TSMO) 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.		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.
	Transportation Demand Management (TDM)		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.
	Transportation Management Program		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.
	Metro Connects		King County Metro's vision for providing more service, more choices and one easy-to-use system over a 30 year period

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
Public Services			
	Crime Prevention Coordinators		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.
	Micro Community Policing Plans		SPD has developed Micro Community Policing Plans (MCPP) with community engagement and considering crime data to help direct police services to address the individual needs of each community.
	Seattle Fire Protection Systems Code	Seattle Building Code Section 9	Regulates Fire Protection Systems.
	Seattle Land Use Code	Title 23 SMC 23.60A	▪ 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. ▪ The Seattle Shoreline Master Program requires shoreline public access for development that creates a demand.
	Seattle Solid Waste, Solid Waste Management Planning		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.
	Seattle Public Utilities Strategic Business Plan		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
Utilities[2]			
	Water Code	SMC Title 21, Subtitle I	Water Rates and Regulations
	Building and Construction Codes	SMC Title 22	Includes plumbing and fire codes
	City of Seattle Standards and Specifications	Standard Specifications for Road, Bridge, and Municipal Construction (2020)	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	WAC Title 246	Public Water Systems. See Chapters 290-296.

[2] 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 Exhaust	PM10 BWTW	Total PM10	PM2.5 Exhaust	PM2.5 BWTW	Total PM2.5	SO2	MTCO2e
					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
Total	**284.0**	**1,804.2**	**116.7**	**3.8**	**0.1**	**3.8**	**3.3**	**0.0**	**3.3**	**1.5**	**31,069.8**

Alternative 1

	VOC	CO	NOX	PM10 Exhaust	PM10 BWTW	Total PM10	PM2.5 Exhaust	PM2.5 BWTW	Total PM2.5	SO2	MTCO2e
					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
Total	**157.3**	**659.6**	**56.4**	**4.7**	**0.1**	**4.8**	**4.2**	**0.0**	**4.2**	**0.2**	**29,408.2**

Alternative 2

	VOC	CO	NOX	PM10 Exhaust	PM10 BWTW	Total PM10	PM2.5 Exhaust	PM2.5 BWTW	Total PM2.5	SO2	MTCO2e
					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
Total	**161.7**	**678.2**	**57.8**	**4.9**	**0.1**	**4.9**	**4.3**	**0.0**	**4.3**	**0.2**	**30,235.5**

Alternative 3

	VOC	CO	NOX	PM10 Exhaust	PM10 BWTW	Total PM10	PM2.5 Exhaust	PM2.5 BWTW	Total PM2.5	SO2	MTCO2e
					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
Total	**161.7**	**678.2**	**57.8**	**4.9**	**0.1**	**4.9**	**4.3**	**0.0**	**4.3**	**0.2**	**30,234.8**

Alternative 5

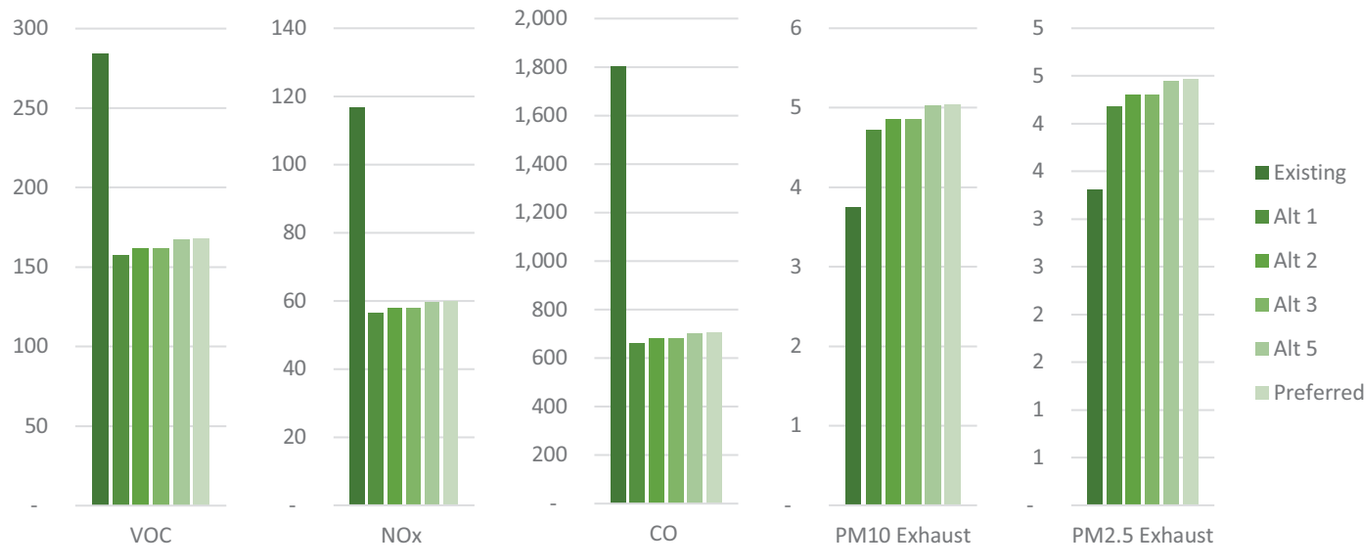
	VOC	CO	NOX	PM10 Exhaust	PM10 BWTW	Total PM10	PM2.5 Exhaust	PM2.5 BWTW	Total PM2.5	SO2	MTCO2e
					Tons/Year						
Cars	161.4	683.1	51.9	4.9	0.1	5.0	4.4	0.0	4.4	0.2	30,375.3
Trucks	5.4	15.6	6.8	0.1	0.0	0.1	0.1	0.0	0.1	0.0	779.3
Buses	0.4	2.3	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	91.3
Total	**167.1**	**701.0**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

Transportation-Related Criteria Pollutant Emissions (Tons/Year)

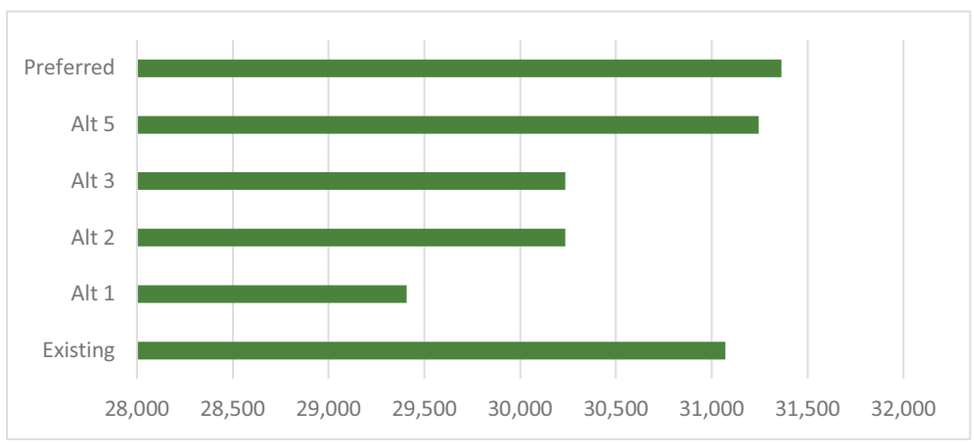
	VOC	CO	NOx	PM10 Exhaust	PM2.5 Exhaust	SO2
Existing	284	1,804	117	4	3	2
Alt 1	157	660	56	5	4	0
Alt 2	162	678	58	5	4	0
Alt 3	162	678	58	5	4	0
Alt 5	167	701	60	5	4	0
Preferred	168	704	60	5	4	0

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
Total	**31,070**	**29,408**	**30,235**	**30,235**	**31,246**	**31,363**
		(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 MTCO2e		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 MTCO2e		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 MTCO2e		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 MTCO2e		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 MTCO2e		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 MTCO2e		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

Existing

	Cars	*Trucks*	*Buses*	*Million BTU*	*trillion Btu*
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
Total Fuel Use				361,969	
Trillion BTU/Capita				0.45	

Washington State Fuel Usage in 2020

Trillion Btu	
gasoline	258.20
Diesel	150.00
NG	0.01
ethanol	20.30

* US EIA, 2020

Alternative 1

	Cars	*Trucks*	*Buses*	*Million BTU*	*trillion Btu*	*% of state*
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%
				359,113		
				2.19		

Alternative 2

	Cars	*Trucks*	*Buses*	*Million BTU*	*trillion Btu*	*% of state*
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%
				369,245		
				1.80		

Alternative 3

	Cars	*Trucks*	*Buses*	*Million BTU*	*trillion Btu*	*% of state*
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%
				369,235		
				1.80		

Alternative 5

	Cars	*Trucks*	*Buses*	*Million BTU*	*trillion Btu*	*% of state*
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%

Preferred Alternative

	Cars	*Trucks*	*Buses*	*Million BTU*	*trillion Btu*	*% of state*
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%
				383,054		
				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

	Alt 1	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Preferred**
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

	Alt 1	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Preferred**
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

Electricty	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/auez-gz8p/data

Industrial Energy Consumption Rates

Electricty	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/auez-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)						
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%

	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

Electricty	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/auez-gz8p/data

Industrial Energy Consumption Rates

Electricty	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/auez-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)						
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%

	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

	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Preferred
Solid waste						
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
CAP	*70*	*% diversion rate*				
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 Tons (2020)	Housing units (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

Unit Type	CalEEMod Unit Type	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Preferred
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

	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			
Alternative 1	**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**
Urban Centers	-	-	-	-	-	14,654	6,049	19,048	6,740	-	4,290	3,595	12,017	2,646		26,610	18,265	91,768	90,214		11,536	9,061	3,359	3,359		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		57,090	36,970	126,192	102,959
Hub Urban Villages	16,404	7,588	28,714	6,504	-	4,159	927	2,216	622	-	-	-	-	-		-	-	-	-		-	-	-	-		4,004	3,128	1,597	1,597		-	-	-	-		10,128	1,242	15,699	3,053		34,695	12,885	48,226	11,776
Residential Urban Villages	12,708	3,822	5,090	2,020	-	2,188	1,466	936	366	-	638	402	289	283		1,314	1,010	613	281		5,309	3,193	2,751	1,067		5,792	1,143	2,081	897		1,156	259	2,116	450		11,961	3,469	4,729	2,373		41,066	14,764	18,605	7,735
Manufacturing Industrial Centers	-	-	-	-		-	-	-	-		542	628	4,064	6,100		-	-	-	-		-	-	-	-		-	-	-	-		2,086	848	17,070	12,700		-	-	-	-		2,628	1,476	21,134	18,800
Growth Area (Maritime Industrial)	-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		148	144	90	-		-	-	-	-		535	392	317	-		144	140	81	-		827	676	488	-
Outside Subareas (This Alternative)	2,386	1,040	2,307	1,377	-	4,602	2,006	2,305	1,376	-	1,224	534	749	447		-	-	-	-		1,308	570	171	102		2,809	1,225	1,720	1,027		386	168	690	412		2,181	951	3,475	2,075		14,896	6,494	11,417	6,816
Outside Subareas (No Change All Alternatives)	2,987	1,302	3,348	1,999	-	5,381	2,346	2,977	1,777	-	1,971	859	1,775	1,060		316	138	398	238		656	286	275	164		1,567	683	2,569	1,533		602	262	1,687	1,007		1,970	859	3,578	2,136		15,450	6,735	16,607	9,914
Total	**34,485**	**13,752**	**39,459**	**11,900**	-	**30,984**	**12,794**	**27,482**	**10,881**	-	**8,665**	**6,018**	**18,894**	**10,534**		**28,240**	**19,413**	**92,779**	**90,733**		**18,957**	**13,254**	**6,646**	**4,692**		**14,172**	**6,179**	**7,967**	**5,054**		**4,765**	**1,929**	**21,880**	**14,569**		**26,384**	**6,661**	**27,562**	**9,637**		**166,652**	**80,000**	**242,669**	**158,000**
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			
Alternative 2	**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**
Urban Centers	-	-	-	-	-	14,654	6,049	19,048	6,538	-	4,290	3,595	12,017	2,566		26,610	18,265	91,768	87,508		11,536	9,061	3,359	3,258		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		57,090	36,970	126,192	99,870
Hub Urban Villages	16,404	7,588	28,714	6,310	-	4,159	927	2,216	603	-	-	-	-	-		-	-	-	-		-	-	-	-		4,004	3,128	1,597	1,543		-	-	-	-		10,128	1,242	15,699	2,961		34,695	12,885	48,226	11,417
Residential Urban Villages	12,708	3,822	5,090	1,957	-	2,188	1,466	936	355	-	638	402	289	273		1,314	1,010	613	273		5,309	3,193	2,751	1,035		5,792	1,143	2,081	870		1,156	259	2,116	437		11,961	3,469	4,729	2,335		41,066	14,764	18,605	7,535
Manufacturing Industrial Centers	-	-	-	-		-	-	-	-		542	628	4,064	6,100		-	-	-	-		-	-	-	-		-	-	-	-		2,086	848	17,070	12,700		-	-	-	-		2,628	1,476	21,134	18,800
Growth Area (Maritime Industrial)	-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		148	144	90	-		-	-	-	-		535	392	317	-		144	140	81	-		827	676	488	-
Neighborhood Anchor - Low Risk	2,399	5,394	2,199	2,236	-	4,171	6,541	2,078	2,198	-	953	2,402	741	857		-	-	-	-		942	3,430	186	723		669	1,706	207	441		-	-	-	-		159	546	35	128		9,293	20,019	5,446	6,583
Neighborhood Anchor - High Risk						390	453	99	122		-	-	-	-		-	-	-	-		-	-	-	-		1,700	2,308	1,485	1,217		384	506	690	471		636	881	159	235		3,110	4,148	2,433	2,045
Outside Subareas (This Alternative)	601	262	109	64	-	1,105	482	175	157	-	419	183	8	9		-	-	-	-		498	217	32	19		1,052	459	28	22		9	4	-	-		1,652	720	3,280	1,866		5,336	2,327	3,632	2,119
Outside Subareas (No Change All Alternatives)	2,987	1,302	3,348	1,939	-	5,381	2,346	2,977	1,724	-	1,971	859	1,775	1,028		316	138	398	230		656	286	275	159		1,567	683	2,569	1,488		602	262	1,687	977		1,970	859	3,578	2,072		15,450	6,735	16,607	9,617
Total	**35,099**	**18,368**	**39,460**	**12,506**	-	**32,048**	**18,264**	**27,529**	**11,697**	-	**8,813**	**8,069**	**18,894**	**10,829**		**28,240**	**19,413**	**92,779**	**88,011**		**19,089**	**16,331**	**6,693**	**5,194**		**14,784**	**9,427**	**7,967**	**5,581**		**4,772**	**2,271**	**21,880**	**14,585**		**26,650**	**7,857**	**27,561**	**9,597**		**169,495**	**100,000**	**242,763**	**158,000**
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			
Alternative 3	**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**
Urban Centers	-	-	-	-	-	14,654	6,049	19,048	6,538	-	4,290	3,595	12,017	2,566		26,610	18,265	91,768	87,508		11,536	9,061	3,359	3,258		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		57,090	36,970	126,192	99,870
Hub Urban Villages	16,404	7,588	28,714	6,310	-	4,159	927	2,216	603	-	-	-	-	-		-	-	-	-		-	-	-	-		4,004	3,128	1,597	1,543		-	-	-	-		10,128	1,242	15,699	2,961		34,695	12,885	48,226	11,417
Residential Urban Villages	12,708	3,822	5,090	1,957	-	2,188	1,466	936	355	-	638	402	289	273		1,314	1,010	613	273		5,309	3,193	2,751	1,035		5,792	1,143	2,081	870		1,156	259	2,116	437		11,961	3,469	4,729	2,335		41,066	14,764	18,605	7,535
Manufacturing Industrial Centers	-	-	-	-		-	-	-	-		542	628	4,064	6,100		-	-	-	-		-	-	-	-		-	-	-	-		2,086	848	17,070	12,700		-	-	-	-		2,628	1,476	21,134	18,800
Growth Area (Maritime Industrial)	-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		148	144	90	-		-	-	-	-		535	392	317	-		144	140	81	-		827	676	488	-
Neighborhood Residential	9,210	4,095	123	754	-	17,892	7,921	154	221	-	1,680	875	24	18		-	-	-	-		1,218	741	37	284		9,654	4,480	15	23		41	21	-	-		8,589	4,290	3,176	4,606		48,284	22,423	3,529	5,906
Outside Subareas (This Alternative)	1,741	760	2,193	1,330	-	3,429	1,497	2,156	1,389	-	812	355	721	439		-	-	-	-		767	334	139	80		1,702	743	1,707	1,056		376	165	690	401		498	217	277	153		9,325	4,071	7,883	4,855
Outside Subareas (No Change All Alternatives)	2,987	1,302	3,348	1,939	-	5,381	2,346	2,977	1,724	-	1,971	859	1,775	1,028		316	138	398	230		656	286	275	159		1,567	683	2,569	1,488		602	262	1,687	977		1,970	859	3,578	2,072		15,450	6,735	16,607	9,617
Total	**43,050**	**17,567**	**39,468**	**12,290**	-	**47,703**	**20,206**	**27,487**	**10,830**	-	**9,933**	**6,714**	**18,890**	**10,424**		**28,240**	**19,413**	**92,779**	**88,011**		**19,634**	**13,759**	**6,651**	**4,823**		**22,719**	**10,177**	**7,969**	**4,980**		**4,796**	**1,947**	**21,880**	**14,515**		**33,290**	**10,217**	**27,540**	**12,127**		**209,365**	**100,000**	**242,664**	**158,000**
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			
Alternative 4	**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**
Urban Centers	-	-	-	-	-	14,654	6,049	19,048	6,538	-	4,290	3,595	12,017	2,566		26,610	18,265	91,768	87,508		11,536	9,061	3,359	3,258		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		57,090	36,970	126,192	99,870
Hub Urban Villages	16,404	7,588	28,714	6,310	-	4,159	927	2,216	603	-	-	-	-	-		-	-	-	-		-	-	-	-		4,004	3,128	1,597	1,543		-	-	-	-		10,128	1,242	15,699	2,961		34,695	12,885	48,226	11,417
Residential Urban Villages	12,708	3,822	5,090	1,957	-	2,188	1,466	936	355	-	638	402	289	273		1,314	1,010	613	273		5,309	3,193	2,751	1,035		5,792	1,143	2,081	870		1,156	259	2,116	437		11,961	3,469	4,729	2,335		41,066	14,764	18,605	7,535
Manufacturing Industrial Centers	-	-	-	-		-	-	-	-		542	628	4,064	6,100		-	-	-	-		-	-	-	-		-	-	-	-		2,086	848	17,070	12,700		-	-	-	-		2,628	1,476	21,134	18,800
Growth Area (Maritime Industrial)	-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		148	144	90	-		-	-	-	-		535	392	317	-		144	140	81	-		827	676	488	-
Neighborhood Residential-Corridor	5,081	3,579	104	1,165	-	12,150	8,484	15	129	-	914	694	-	-		-	-	-	-		816	719	37	449		5,718	4,114	1	12		41	33	-	-		4,744	3,584	175	2,155		29,464	21,207	332	3,910
Outside Subareas (This Alternative)	2,090	910	2,212	1,371	-	4,063	1,769	2,295	1,549	-	1,055	460	741	447		-	-	-	-		929	404	139	91		2,277	993	1,720	1,098		376	164	690	401		1,347	587	3,284	1,894		12,137	5,287	11,081	6,851
Outside Subareas (No Change All Alternatives)	2,987	1,302	3,348	1,939	-	5,381	2,346	2,977	1,724	-	1,971	859	1,775	1,028		316	138	398	230		656	286	275	159		1,567	683	2,569	1,488		602	262	1,687	977		1,970	859	3,578	2,072		15,450	6,735	16,607	9,617
Total	**39,270**	**17,201**	**39,468**	**12,742**	-	**42,595**	**21,041**	**27,487**	**10,898**	-	**9,410**	**6,638**	**18,886**	**10,414**		**28,240**	**19,413**	**92,779**	**88,011**		**19,394**	**13,807**	**6,651**	**4,992**		**19,358**	**10,061**	**7,968**	**5,011**		**4,796**	**1,958**	**21,880**	**14,515**		**30,294**	**9,881**	**27,546**	**11,417**		**193,357**	**100,000**	**242,665**	**158,000**
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			
Alternative 5	**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**
Urban Centers	5,601	6,042	4,129	4,097	-	14,654	6,049	19,048	6,403	-	4,367	3,634	12,017	2,514		26,610	18,265	91,768	85,703		11,536	9,061	3,359	3,197		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		62,768	43,051	130,321	101,908
Hub Urban Villages	10,803	2,546	24,585	2,256	-	4,159	927	2,216	591	-	-	-	-	-		-	-	-	-		-	-	-	-		4,071	3,140	1,612	1,526		-	-	-	-		10,128	1,242	15,699	2,900		29,161	7,855	44,112	7,273
Residential Urban Villages	12,998	3,838	5,108	1,928	-	10,440	3,110	1,852	704	-	708	429	289	267		1,314	1,010	613	267		5,317	3,194	2,751	1,014		6,048	2,884	2,081	1,152		1,156	1,659	2,116	671		12,079	6,738	4,827	2,875		50,060	22,862	19,637	8,878
Manufacturing Industrial Centers	-	-	-	-	-	-	-	-	-	-	542	628	4,064	6,100		-	-	-	-		-	-	-	-		-	-	-	-		2,086	848	17,070	12,700		-	-	-	-		2,628	1,476	21,134	18,800
Growth Area (Maritime Industrial)	-	-	-	-	-	-	-	-	-	-	-	-	-	-		-	-	-	-		148	144	90	-		-	-	-	-		535	392	317	-		144	140	81	-		827	676	488	-
Neighborhood Anchor - Low Risk	2,399	4,495	2,199	1,893	-	4,811	5,127	1,455	1,799	-	953	2,002	741	707		-	-	-	-		942	2,830	186	510		669	1,406	207	333		-	-	-	-		159	446	35	92		9,933	16,306	4,823	5,334
Neighborhood Anchor - High Risk	-	-	-	-	-	-	-	-	-	-	-	-	-	-		-	-	-	-		-	-	-	-		1,373	2,083	1,485	1,101		377	461	690	443		452	791	160	194		2,202	3,335	2,335	1,738
Neighborhood Residential	4,033	1,885	6	6	-	5,487	2,569	84	84	-	591	310	4	4		-	-	-	-		395	240	-	-		3,777	1,878	14	14		-	-	-	-		3,716	1,966	2,988	3,005		17,999	8,848	3,096	3,113
Neighborhood Residential-Corridor	4,229	1,390	93	457	-	10,616	3,429	10	49	-	801	305	-	-		-	-	-	-		650	346	36	177		4,887	1,674	1	5		33	14	-	-		4,458	1,698	173	850		25,674	8,856	313	1,538
Outside Subareas (This Alternative)	-	-	-	-	-	-	-	-	-	-	-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-
Outside Subareas (No Change All Alternatives)	2,987	1,302	3,348	1,899	-	5,381	2,346	2,977	1,688	-	1,971	859	1,775	1,001		316	138	398	236		656	286	275	156		1,567	683	2,569	1,457		602	262	1,687	956		1,970	859	3,578	2,029		15,450	6,735	16,607	9,418
Total	**43,050**	**21,498**	**39,468**	**12,536**	-	**55,548**	**23,557**	**27,642**	**11,318**	-	**9,933**	**8,167**	**18,890**	**10,599**		**28,240**	**19,413**	**92,779**	**86,196**		**19,644**	**16,101**	**6,697**	**5,048**		**22,392**	**13,748**	**7,969**	**5,588**		**4,789**	**3,636**	**21,880**	**14,770**		**33,106**	**13,880**	**27,541**	**11,945**		**216,702**	**120,000**	**242,866**	**158,000**
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%					

Housing

	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5
Area 1 Northwest	17.2%	18.4%	17.6%	17.2%	17.9%
Area 2 Northeast	16.0%	18.3%	20.2%	21.0%	19.6%
Area 3 West	7.5%	8.1%	6.7%	6.6%	6.8%
Area 4 Downtown	24.3%	19.4%	19.4%	19.4%	16.2%
Area 5 East	16.6%	16.3%	13.8%	13.8%	13.4%
Area 6 Southwest	7.7%	9.4%	10.2%	10.1%	11.5%
Area 7 Duwamish Manufacturing Center	2.4%	2.3%	1.9%	2.0%	3.0%
Area 8 Southeast	8.3%	7.9%	10.2%	9.9%	11.6%
Total	100.0%	100.0%	100.0%	100.0%	100.0%

Jobs

	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5
Area 1 Northwest	7.5%	7.9%	7.8%	8.1%	7.9%
Area 2 Northeast	6.9%	7.4%	6.9%	6.9%	7.2%
Area 3 West	6.7%	6.9%	6.6%	6.6%	6.7%
Area 4 Downtown	57.4%	55.7%	55.7%	55.7%	54.6%
Area 5 East	3.0%	3.3%	3.1%	3.2%	3.2%
Area 6 Southwest	3.2%	3.5%	3.2%	3.2%	3.5%
Area 7 Duwamish Manufacturing Center	9.2%	9.2%	9.2%	9.2%	9.3%
Area 8 Southeast	6.1%	6.1%	7.7%	7.2%	7.6%
Total	100.0%	100.0%	100.0%	100.0%	100.0%

Square Footage

Using Job Targets 250 square feet

Commercial Square Feet

	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5
Area 1 Northwest	2,618,000	2,751,320	2,703,800	2,802,240	2,737,920
Area 2 Northeast	2,193,820	2,573,340	2,382,600	2,397,560	2,489,960
Area 3 West	1,803,167	1,868,067	1,778,967	1,776,767	1,817,467
Area 4 Downtown	19,961,240	19,362,420	19,362,420	19,362,420	18,961,120
Area 5 East	1,032,240	1,162,680	1,061,060	1,098,240	1,110,560
Area 6 Southwest	1,111,880	1,227,820	1,095,600	1,102,420	1,229,360
Area 7 Duwamish Manufacturing Center	2,134,397	2,107,917	2,122,217	2,122,517	2,178,358
Area 8 Southeast	2,120,140	2,311,940	2,467,940	2,511,760	2,627,900
Total	33,174,904	33,174,904	33,174,904	33,174,904	33,174,845
	132,700	132,700	132,700	132,700	132,699

Using Job Targets 700 square feet

Industrial Square Feet

	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5
Area 1 Northwest	999,600	1,050,504	1,032,360	1,070,328	1,053,024
Area 2 Northeast	914,004	982,548	909,720	915,432	950,712
Area 3 West	2,324,932	2,349,712	2,315,692	2,314,852	2,330,392
Area 4 Downtown	7,621,572	7,392,924	7,392,924	7,392,924	7,240,464
Area 5 East	394,128	436,296	405,132	419,328	424,032
Area 6 Southwest	424,536	468,804	418,320	420,924	469,392
Area 7 Duwamish Manufacturing Center	4,221,988	4,220,332	4,217,452	4,217,452	4,238,840
Area 8 Southeast	2,120,140	2,311,940	2,467,940	2,511,760	2,627,900
Total	17,710,268	17,710,268	17,710,268	17,710,268	17,710,246
	25,300	25,300	25,300	25,300	25,300

	Split %Com	%Ind
SIML	54%	46%
General	88%	12.0%

SIML and UGC Jobs/Sq Ft
SIML Job Splits in MIC
Citywide excluding SIML 88% comm and 12% ind per Census On the Map 2019

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 StrategyEmployment 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 jot

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

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

Land Use	Industry	Ballard	Interbay/ Dravus	Interbay/ SmithCove	SODO/ Stadium	South Park/ Georgetown
Other	Hospitality & Tourism	1,400	1,400	1,200	1,000	700
Ind	Construction and Utilities	850	1,400	1,571	1,000	700
Com & Off	ICT	365	900	577	571	529
Ind	Distribution & Commerce	850	1,400	1,571	1,000	700
Ind	Food & Beverage Production	850	1,400	1,571	1,000	700
Ind	Aerospace	850	1,400	1,571	1,000	700
Ind	Transportation & Logistics	850	1,400	1,571	1,000	700
Ind	Maritime	850	1,400	1,571	1,000	700
Ind	Other Manufacturing	850	1,400	1,571	1,000	700
Com & Off	All Other Retail	365	900	577	571	529
Com & Off	All Other Services	365	900	577	571	529
Gov & Ed	Government	1,000	1,000	1,000	429	371
Gov & Ed	Education	1,000	1,000	1,000	429	371

SECTOR SPLITS: CAI, September 1, 2020: Seattle Maritime and Industrial StrategyEmployment 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 CAGR	2018-2035 Growth
All Other Services	209,800	232,600	249,500	280,400	0.7%	30,900
Hospitality & Tourism	52,800	63,400	70,800	95,300	1.8%	24,500
Distribution & E-commerce	20,500	38,700	60,400	104,400	3.3%	44,000
Education	58,900	66,500	59,000	58,400	-0.1%	-600
ICT	23,900	36,000	50,400	129,400	5.7%	79,000
Government	48,700	46,600	49,400	49,000	0.0%	-400
Construction and Utilities	23,200	27,400	34,400	52,900	2.6%	18,500
All Other Retail	21,900	23,400	23,000	24,500	0.4%	1,500
Food & Beverage Productio	13,100	15,900	16,500	22,600	1.9%	6,100
Maritime	16,500	15,100	15,600	15,900	0.1%	300
Other Manufacturing	10,900	11,200	10,600	8,300	-1.4%	-2,300
Transportation & Logistics	7,200	7,700	9,100	11,800	1.5%	2,700
Aerospace	9,500	8,700	7,900	7,900	0.0%	0
Suppressed	100	100	200	200	0.0%	0
Total	517,100	593,000	656,800	861,000	1.6%	204,200

Estimate 2035 Share by Jobs and apply?

Commercial	
Commercial	
Industrial	
Commercial	
Commercial	
Commercial	
Industrial	
Commercial	
Industrial	
Industrial	
Industrial	
Industrial	
Industrial	

SIML Emp SF

Base Year Split	Industrial	Non-Industrial
BINMIC	6,783,129	5,375,837
Greater Duwamish	34632076	13,896,776
Total	**41,415,205**	**19,272,613**

Preferred Alternative - Balanced	Gross	
Industrial Emp	**Total Emp**	**% Industrial**
70,853	134,045	52.9%
Preferred Alternative - Balanced	**Net**	
16,253	35,545	45.7%

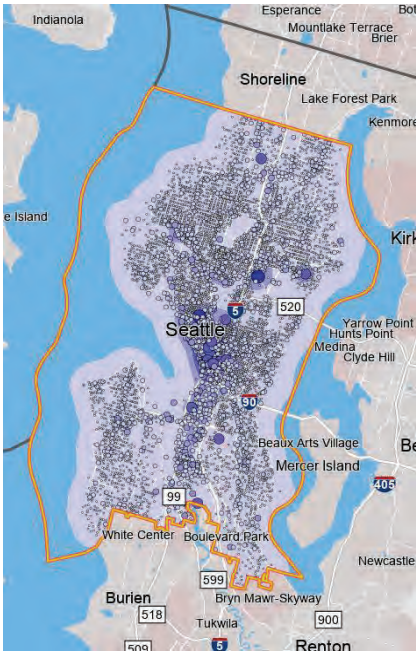
Industrial	Commercial
46%	54%

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

SECTOR SPLITS: Census on the Map, Total Jobs

Jobs by NA	Citywide 2019		SIML 2019		Citywide Minus SIML 2019
	Count	Share	Count	Share	
Agriculture,	1,261	0.2%	741	1.0%	520
Mining, Qua	135	0.0%	48	0.1%	87
Utilities	3,312	0.6%	168	0.2%	3,144
Constructior	24,590	4.2%	6,653	8.9%	17,937
Manufacturi	27,519	4.7%	16,482	22.2%	11,037
Wholesale T	20,904	3.6%	7,200	9.7%	13,704
Retail Trade	40,787	7.0%	4,593	6.2%	36,194
Transportati	23,520	4.0%	6,334	8.5%	17,186
Information	36,909	6.3%	4,143	5.6%	32,766
Finance and	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
Managemer	18,644	3.2%	7,103	9.5%	11,541
Administratic	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, Enterta	14,268	2.4%	2,219	3.0%	12,049
Accommoda	55,410	9.5%	4,955	6.7%	50,455
Other Servic	26,194	4.5%	2,357	3.2%	23,837
Public Admi	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_2 emission factors (based on the SAFE final rule) vary by model year from 2017 through 2025.[1] 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.[2]

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

[2] *MOVES3 technical guidance - US EPA*. (n.d.). Retrieved March 3, 2023, from https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=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)

Exisiting - MOVES Output Summary

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

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
Total	**284.02**	**116.74**	**1,804.17**	**1.54**	**3.81**	**3.32**	**31,069.81**

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
Total	**3.74**	**3.31**	**0.06**	**0.01**

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	**338,092.0**
Diesel	13,508.1	5,938.1	783.4	**20,229.6**
CNG	-	110.9	49.7	**160.6**
Ethanol (E-85)	630.5	-	-	**630.5**

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
Total	**157.31**	**56.37**	**659.55**	**0.16**	**4.78**	**4.19**	**29,408.21**

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
Total	**4.72**	**4.18**	**0.06**	**0.01**

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	**347,762.1**
Diesel	13,895.2	5,993.4	783.5	**20,672.2**
CNG	-	112.0	49.7	**161.7**
Ethanol (E-85)	648.6	-	-	**648.6**

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
Total	**161.73**	**57.84**	**678.21**	**0.16**	**4.92**	**4.31**	**30,235.44**

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
Total	**4.86**	**4.30**	**0.06**	**0.01**

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	**347,732.2**
Diesel	13,893.4	6,015.5	783.5	**20,692.3**
CNG	-	112.5	49.7	**162.2**
Ethanol (E-85)	648.5	-	-	**648.5**

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
Total	**161.73**	**57.84**	**678.21**	**0.16**	**4.86**	**4.30**	**30,234.78**

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
Total	**4.86**	**4.30**	**0.06**	**0.01**

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	**359,567.5**
Diesel	14,367.8	6,067.3	783.6	**21,218.7**
CNG	-	113.4	49.7	**163.1**
Ethanol (E-85)	670.7	-	-	**670.7**

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
Total	**167.14**	**59.63**	**701.00**	**0.17**	**5.09**	**4.45**	**31,245.91**

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
Total	**5.02**	**4.45**	**0.06**	**0.01**

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

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

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
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

	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	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

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

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

		Highest		

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
Total	**754.3745**	**50.5559**	**625.4016**	**0.2967**	**0.0000**	**6.6562**	**6.6562**	**0.0000**	**6.6562**	**6.6562**	**24,555.2078**	**49,106.7501**	**73,661.9579**	**1,453.0197**	**0.8825**	**110,250.4313**

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
Total	**754.3745**	**50.5559**	**625.4016**	**0.2967**	**0.0000**	**6.6562**	**6.6562**	**0.0000**	**6.6562**	**6.6562**	**24,555.2078**	**49,106.7501**	**73,661.9579**	**1,453.0197**	**0.8825**	**110,250.4313**

	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	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

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

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

Unmitigated 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
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**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 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
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

4.0 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

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	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		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	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

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

	Miles			Trip %			Trip Purpose %		
Land Use	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 1 - 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	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
NaturalGas 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

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
Total		**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**

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
Total		**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**

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
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

6.0 Area Detail

6.1 Mitigation Measures Area

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

	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
Total	**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**

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
Total	**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**

7.0 Water Detail

7.1 Mitigation Measures Water

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

	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

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
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

8.0 Waste Detail

8.1 Mitigation Measures Waste

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

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	24,555.2078	1,451.1712	0.0000	60,834.4880
Unmitigated	24,555.2078	1,451.1712	0.0000	60,834.4880

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
Total		**24,555.2078**	**1,451.1712**	**0.0000**	**60,834.4880**

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
Total		**24,555.2078**	**1,451.1712**	**0.0000**	**60,834.4880**

9.0 Operational Offroad

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

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

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

Seattle Comprehensive Plan - Alt 2

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	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

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

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

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

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

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

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

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

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
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

	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	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

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

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

		Highest		

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
Total	**834.9553**	**54.0372**	**774.0068**	**0.3159**	**0.0000**	**7.6233**	**7.6233**	**0.0000**	**7.6233**	**7.6233**	**25,854.3500**	**51,404.6890**	**77,259.0390**	**1,530.0671**	**0.9202**	**115,784.9263**

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
Total	**834.9553**	**54.0372**	**774.0068**	**0.3159**	**0.0000**	**7.6233**	**7.6233**	**0.0000**	**7.6233**	**7.6233**	**25,854.3500**	**51,404.6890**	**77,259.0390**	**1,530.0671**	**0.9202**	**115,784.9263**

	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	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

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

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

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

3.2 Demolition - 2023

Unmitigated 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
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**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 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
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

4.0 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

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	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		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	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

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

	Miles			Trip %			Trip Purpose %		
Land Use	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	5.0716	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

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
Total		**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**

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
Total		**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**

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
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

6.0 Area Detail

6.1 Mitigation Measures Area

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
Total	**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**

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
Total	**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**

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

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
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

8.0 Waste Detail

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	25,854.3500	1,527.9483	0.0000	64,053.0577
Unmitigated	25,854.3500	1,527.9483	0.0000	64,053.0577

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
Total		**25,854.3500**	**1,527.9483**	**0.0000**	**64,053.0577**

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
Total		**25,854.3500**	**1,527.9483**	**0.0000**	**64,053.0577**

9.0 Operational Offroad

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

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

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

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

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

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

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

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

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

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

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
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

	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	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

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

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

		Highest		

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
Total	**836.2895**	**54.4119**	**774.1662**	**0.3183**	**0.0000**	**7.6536**	**7.6536**	**0.0000**	**7.6536**	**7.6536**	**25,951.7856**	**51,838.6841**	**77,790.4697**	**1,535.8337**	**0.9281**	**116,462.8931**

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
Total	**836.2895**	**54.4119**	**774.1662**	**0.3183**	**0.0000**	**7.6536**	**7.6536**	**0.0000**	**7.6536**	**7.6536**	**25,951.7856**	**51,838.6841**	**77,790.4697**	**1,535.8337**	**0.9281**	**116,462.8931**

	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	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

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

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

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

3.2 Demolition - 2023

Unmitigated 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
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**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 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
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

4.0 Operational Detail - Mobile

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

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

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	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		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	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

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

	Miles			Trip %			Trip Purpose %		
Land Use	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 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					
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

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
Total		**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**

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
Total		**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**

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
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

6.0 Area Detail

6.1 Mitigation Measures Area

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
Total	**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**

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
Total	**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**

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

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
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

8.0 Waste Detail

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	25,951.7856	1,533.7066	0.0000	64,294.4504
Unmitigated	25,951.7856	1,533.7066	0.0000	64,294.4504

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
Total		**25,951.7856**	**1,533.7066**	**0.0000**	**64,294.4505**

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
Total		**25,951.7856**	**1,533.7066**	**0.0000**	**64,294.4505**

9.0 Operational Offroad

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

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

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

Seattle Comprehensive Plan - Alt 4

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	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

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

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

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

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
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

	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	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

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		

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
Total	**836.2622**	**54.1785**	**774.0669**	**0.3168**	**0.0000**	**7.6347**	**7.6347**	**0.0000**	**7.6347**	**7.6347**	**25,951.7856**	**51,568.3107**	**77,520.0963**	**1,535.8285**	**0.9232**	**116,190.9130**

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
Total	**836.2622**	**54.1785**	**774.0669**	**0.3168**	**0.0000**	**7.6347**	**7.6347**	**0.0000**	**7.6347**	**7.6347**	**25,951.7856**	**51,568.3107**	**77,520.0963**	**1,535.8285**	**0.9232**	**116,190.9130**

	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	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

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

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

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

3.2 Demolition - 2023

Unmitigated 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
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**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 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
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

4.0 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

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	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		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	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

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

	Miles			Trip %			Trip Purpose %		
Land Use	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	50,354.5220	50,354.5220	0.9651	0.9232	50,653.7537
NaturalGas Unmitigated	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

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
Total		**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**

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
Total		**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**

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
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

6.0 Area Detail

6.1 Mitigation Measures Area

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
Total	**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**

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
Total	**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**

7.0 Water Detail

7.1 Mitigation Measures Water

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

	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

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
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

8.0 Waste Detail

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	25,951.7856	1,533.7066	0.0000	64,294.4504
Unmitigated	25,951.7856	1,533.7066	0.0000	64,294.4504

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
Total		**25,951.7856**	**1,533.7066**	**0.0000**	**64,294.4505**

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
Total		**25,951.7856**	**1,533.7066**	**0.0000**	**64,294.4505**

9.0 Operational Offroad

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

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

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

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

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

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

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

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

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

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

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

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
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

	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	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

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

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

		Highest		

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
Total	**919.0080**	**57.7147**	**922.6954**	**0.3363**	**0.0000**	**8.6061**	**8.6061**	**0.0000**	**8.6061**	**8.6061**	**27,413.9295**	**53,929.8632**	**81,343.7928**	**1,622.5103**	**0.9620**	**122,193.2296**

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
Total	**919.0080**	**57.7147**	**922.6954**	**0.3363**	**0.0000**	**8.6061**	**8.6061**	**0.0000**	**8.6061**	**8.6061**	**27,413.9295**	**53,929.8632**	**81,343.7928**	**1,622.5103**	**0.9620**	**122,193.2296**

	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	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

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

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

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

3.2 Demolition - 2023

Unmitigated 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
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**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 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
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

4.0 Operational Detail - Mobile

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

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

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	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		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	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

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

	Miles			Trip %			Trip Purpose %		
Land Use	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

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
Total		**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**

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
Total		**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

5.3 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
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

6.0 Area Detail

6.1 Mitigation Measures Area

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
Total	**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**

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
Total	**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**

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

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
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

8.0 Waste Detail

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

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
Total		**27,413.9295**	**1,620.1168**	**0.0000**	**67,916.8501**

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
Total		**27,413.9295**	**1,620.1168**	**0.0000**	**67,916.8501**

9.0 Operational Offroad

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

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

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

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

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

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

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

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
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Maximum	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

	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	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

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		

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
Total	**31.9961**	**58.7314**	**923.1280**	**0.3428**	**0.0000**	**8.6883**	**8.6883**	**0.0000**	**8.6883**	**8.6883**	**28,126.8338**	**55,107.2894**	**83,234.1232**	**1,664.6643**	**0.9836**	**125,143.8427**

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
Total	**31.9961**	**58.7314**	**923.1280**	**0.3428**	**0.0000**	**8.6883**	**8.6883**	**0.0000**	**8.6883**	**8.6883**	**28,126.8338**	**55,107.2894**	**83,234.1232**	**1,664.6643**	**0.9836**	**125,143.8427**

	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	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

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

Unmitigated 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
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**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 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
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**	**0.0000**

4.0 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

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	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		
Total	0.00	0.00	0.00		

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	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

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

	Miles			Trip %			Trip Purpose %		
Land Use	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	53,650.9249	53,650.9249	1.0283	0.9836	53,969.7455
NaturalGas Unmitigated	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

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
Total		**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**

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
Total		**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**

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
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total	**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**

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
Total	**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**

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
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

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
Total		**0.0000**	**0.0000**	**0.0000**	**0.0000**

8.0 Waste Detail

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	28,126.8338	1,662.2483	0.0000	69,683.0402
Unmitigated	28,126.8338	1,662.2483	0.0000	69,683.0402

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
Total		**28,126.8338**	**1,662.2483**	**0.0000**	**69,683.0402**

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
Total		**28,126.8338**	**1,662.2483**	**0.0000**	**69,683.0402**

9.0 Operational Offroad

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

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

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

Boilers

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

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

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

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

E Energy Appendix

Seattle Comprehensive Plan
On-Road Transportation Fuel

Existing

	Cars	*Trucks*	*Buses*	*Million BTU*	*trillion Btu*
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
Total Fuel Use				361,969	
Trillion BTU/Capita				0.45	

Washington State Fuel Usage in 2020

Trillion Btu	
gasoline	258.20
Diesel	150.00
NG	0.01
ethanol	20.30

* US EIA, 2020

Alternative 1

	Cars	*Trucks*	*Buses*	*Million BTU*	*trillion Btu*	*% of state*
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%
				359,113		
				2.19		

Alternative 2

	Cars	*Trucks*	*Buses*	*Million BTU*	*trillion Btu*	*% of state*
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%
				369,245		
				1.80		

Alternative 3

	Cars	*Trucks*	*Buses*	*Million BTU*	*trillion Btu*	*% of state*
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%
				369,235		
				1.80		

Alternative 5

	Cars	*Trucks*	*Buses*	*Million BTU*	*trillion Btu*	*% of state*
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%

Preferred Alternative

	Cars	*Trucks*	*Buses*	*Million BTU*	*trillion Btu*	*% of state*
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%
				383,054		
				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

	Alt 1	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Preferred**
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

	Alt 1	**Alt 2**	**Alt 3**	**Alt 4**	**Alt 5**	**Preferred**
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

Electricty	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/auez-gz8p/data

Industrial Energy Consumption Rates

Electricty	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/auez-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)						
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%

	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

Electricty	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/auez-gz8p/data

Industrial Energy Consumption Rates

Electricty	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/auez-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)						
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%

	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

Unit Type	CalEEMod Unit Type	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5	Preferred
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

	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			
Alternative 1	**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**
Urban Centers	-	-	-	-	-	14,654	6,049	19,048	6,740	-	4,290	3,595	12,017	2,646		26,610	18,265	91,768	90,214		11,536	9,061	3,359	3,359		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		57,090	36,970	126,192	102,959
Hub Urban Villages	16,404	7,588	28,714	6,504	-	4,159	927	2,216	622	-	-	-	-	-		-	-	-	-		-	-	-	-		4,004	3,128	1,597	1,597		-	-	-	-		10,128	1,242	15,699	3,053		34,695	12,885	48,226	11,776
Residential Urban Villages	12,708	3,822	5,090	2,020	-	2,188	1,466	936	366	-	638	402	289	283		1,314	1,010	613	281		5,309	3,193	2,751	1,067		5,792	1,143	2,081	897		1,156	259	2,116	450		11,961	3,469	4,729	2,373		41,066	14,764	18,605	7,735
Manufacturing Industrial Centers	-	-	-	-		-	-	-	-		542	628	4,064	6,100		-	-	-	-		-	-	-	-		-	-	-	-		2,086	848	17,070	12,700		-	-	-	-		2,628	1,476	21,134	18,800
Growth Area (Maritime Industrial)	-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		148	144	90	-		-	-	-	-		535	392	317	-		144	140	81	-		827	676	488	-
Outside Subareas (This Alternative)	2,386	1,040	2,307	1,377	-	4,602	2,006	2,305	1,376	-	1,224	534	749	447		-	-	-	-		1,308	570	171	102		2,809	1,225	1,720	1,027		386	168	690	412		2,181	951	3,475	2,075		14,896	6,494	11,417	6,816
Outside Subareas (No Change All Alternatives)	2,987	1,302	3,348	1,999	-	5,381	2,346	2,977	1,777	-	1,971	859	1,775	1,060		316	138	398	238		656	286	275	164		1,567	683	2,569	1,533		602	262	1,687	1,007		1,970	859	3,578	2,136		15,450	6,735	16,607	9,914
Total	**34,485**	**13,752**	**39,459**	**11,900**	-	**30,984**	**12,794**	**27,482**	**10,881**	-	**8,665**	**6,018**	**18,894**	**10,534**		**28,240**	**19,413**	**92,779**	**90,733**		**18,957**	**13,254**	**6,646**	**4,692**		**14,172**	**6,179**	**7,967**	**5,054**		**4,765**	**1,929**	**21,880**	**14,569**		**26,384**	**6,661**	**27,562**	**9,637**		**166,652**	**80,000**	**242,669**	**158,000**
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			
Alternative 2	**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**
Urban Centers	-	-	-	-	-	14,654	6,049	19,048	6,538	-	4,290	3,595	12,017	2,566		26,610	18,265	91,768	87,508		11,536	9,061	3,359	3,258		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		57,090	36,970	126,192	99,870
Hub Urban Villages	16,404	7,588	28,714	6,310	-	4,159	927	2,216	603	-	-	-	-	-		-	-	-	-		-	-	-	-		4,004	3,128	1,597	1,543		-	-	-	-		10,128	1,242	15,699	2,961		34,695	12,885	48,226	11,417
Residential Urban Villages	12,708	3,822	5,090	1,957	-	2,188	1,466	936	355	-	638	402	289	273		1,314	1,010	613	273		5,309	3,193	2,751	1,035		5,792	1,143	2,081	870		1,156	259	2,116	437		11,961	3,469	4,729	2,335		41,066	14,764	18,605	7,535
Manufacturing Industrial Centers	-	-	-	-		-	-	-	-		542	628	4,064	6,100		-	-	-	-		-	-	-	-		-	-	-	-		2,086	848	17,070	12,700		-	-	-	-		2,628	1,476	21,134	18,800
Growth Area (Maritime Industrial)	-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		148	144	90	-		-	-	-	-		535	392	317	-		144	140	81	-		827	676	488	-
Neighborhood Anchor - Low Risk	2,399	5,394	2,199	2,236	-	4,171	6,541	2,078	2,198	-	953	2,402	741	857		-	-	-	-		942	3,430	186	723		669	1,706	207	441		-	-	-	-		159	546	35	128		9,293	20,019	5,446	6,583
Neighborhood Anchor - High Risk						390	453	99	122		-	-	-	-		-	-	-	-		-	-	-	-		1,700	2,308	1,485	1,217		384	506	690	471		636	881	159	235		3,110	4,148	2,433	2,045
Outside Subareas (This Alternative)	601	262	109	64	-	1,105	482	175	157	-	419	183	8	9		-	-	-	-		498	217	32	19		1,052	459	28	22		9	4	-	-		1,652	720	3,280	1,866		5,336	2,327	3,632	2,119
Outside Subareas (No Change All Alternatives)	2,987	1,302	3,348	1,939	-	5,381	2,346	2,977	1,724	-	1,971	859	1,775	1,028		316	138	398	230		656	286	275	159		1,567	683	2,569	1,488		602	262	1,687	977		1,970	859	3,578	2,072		15,450	6,735	16,607	9,617
Total	**35,099**	**18,368**	**39,460**	**12,506**	-	**32,048**	**18,264**	**27,529**	**11,697**	-	**8,813**	**8,069**	**18,894**	**10,829**		**28,240**	**19,413**	**92,779**	**88,011**		**19,089**	**16,331**	**6,693**	**5,194**		**14,784**	**9,427**	**7,967**	**5,581**		**4,772**	**2,271**	**21,880**	**14,585**		**26,650**	**7,857**	**27,561**	**9,597**		**169,495**	**100,000**	**242,763**	**158,000**
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			
Alternative 3	**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**
Urban Centers	-	-	-	-	-	14,654	6,049	19,048	6,538	-	4,290	3,595	12,017	2,566		26,610	18,265	91,768	87,508		11,536	9,061	3,359	3,258		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		57,090	36,970	126,192	99,870
Hub Urban Villages	16,404	7,588	28,714	6,310	-	4,159	927	2,216	603	-	-	-	-	-		-	-	-	-		-	-	-	-		4,004	3,128	1,597	1,543		-	-	-	-		10,128	1,242	15,699	2,961		34,695	12,885	48,226	11,417
Residential Urban Villages	12,708	3,822	5,090	1,957	-	2,188	1,466	936	355	-	638	402	289	273		1,314	1,010	613	273		5,309	3,193	2,751	1,035		5,792	1,143	2,081	870		1,156	259	2,116	437		11,961	3,469	4,729	2,335		41,066	14,764	18,605	7,535
Manufacturing Industrial Centers	-	-	-	-		-	-	-	-		542	628	4,064	6,100		-	-	-	-		-	-	-	-		-	-	-	-		2,086	848	17,070	12,700		-	-	-	-		2,628	1,476	21,134	18,800
Growth Area (Maritime Industrial)	-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		148	144	90	-		-	-	-	-		535	392	317	-		144	140	81	-		827	676	488	-
Neighborhood Residential	9,210	4,095	123	754	-	17,892	7,921	154	221	-	1,680	875	24	18		-	-	-	-		1,218	741	37	284		9,654	4,480	15	23		41	21	-	-		8,589	4,290	3,176	4,606		48,284	22,423	3,529	5,906
Outside Subareas (This Alternative)	1,741	760	2,193	1,330	-	3,429	1,497	2,156	1,389	-	812	355	721	439		-	-	-	-		767	334	139	80		1,702	743	1,707	1,056		376	165	690	401		498	217	277	153		9,325	4,071	7,883	4,855
Outside Subareas (No Change All Alternatives)	2,987	1,302	3,348	1,939	-	5,381	2,346	2,977	1,724	-	1,971	859	1,775	1,028		316	138	398	230		656	286	275	159		1,567	683	2,569	1,488		602	262	1,687	977		1,970	859	3,578	2,072		15,450	6,735	16,607	9,617
Total	**43,050**	**17,567**	**39,468**	**12,290**	-	**47,703**	**20,206**	**27,487**	**10,830**	-	**9,933**	**6,714**	**18,890**	**10,424**		**28,240**	**19,413**	**92,779**	**88,011**		**19,634**	**13,759**	**6,651**	**4,823**		**22,719**	**10,177**	**7,969**	**4,980**		**4,796**	**1,947**	**21,880**	**14,515**		**33,290**	**10,217**	**27,540**	**12,127**		**209,365**	**100,000**	**242,664**	**158,000**
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			
Alternative 4	**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**
Urban Centers	-	-	-	-	-	14,654	6,049	19,048	6,538	-	4,290	3,595	12,017	2,566		26,610	18,265	91,768	87,508		11,536	9,061	3,359	3,258		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		57,090	36,970	126,192	99,870
Hub Urban Villages	16,404	7,588	28,714	6,310	-	4,159	927	2,216	603	-	-	-	-	-		-	-	-	-		-	-	-	-		4,004	3,128	1,597	1,543		-	-	-	-		10,128	1,242	15,699	2,961		34,695	12,885	48,226	11,417
Residential Urban Villages	12,708	3,822	5,090	1,957	-	2,188	1,466	936	355	-	638	402	289	273		1,314	1,010	613	273		5,309	3,193	2,751	1,035		5,792	1,143	2,081	870		1,156	259	2,116	437		11,961	3,469	4,729	2,335		41,066	14,764	18,605	7,535
Manufacturing Industrial Centers	-	-	-	-		-	-	-	-		542	628	4,064	6,100		-	-	-	-		-	-	-	-		-	-	-	-		2,086	848	17,070	12,700		-	-	-	-		2,628	1,476	21,134	18,800
Growth Area (Maritime Industrial)	-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		148	144	90	-		-	-	-	-		535	392	317	-		144	140	81	-		827	676	488	-
Neighborhood Residential-Corridor	5,081	3,579	104	1,165	-	12,150	8,484	15	129	-	914	694	-	-		-	-	-	-		816	719	37	449		5,718	4,114	1	12		41	33	-	-		4,744	3,584	175	2,155		29,464	21,207	332	3,910
Outside Subareas (This Alternative)	2,090	910	2,212	1,371	-	4,063	1,769	2,295	1,549	-	1,055	460	741	447		-	-	-	-		929	404	139	91		2,277	993	1,720	1,098		376	164	690	401		1,347	587	3,284	1,894		12,137	5,287	11,081	6,851
Outside Subareas (No Change All Alternatives)	2,987	1,302	3,348	1,939	-	5,381	2,346	2,977	1,724	-	1,971	859	1,775	1,028		316	138	398	230		656	286	275	159		1,567	683	2,569	1,488		602	262	1,687	977		1,970	859	3,578	2,072		15,450	6,735	16,607	9,617
Total	**39,270**	**17,201**	**39,468**	**12,742**	-	**42,595**	**21,041**	**27,487**	**10,898**	-	**9,410**	**6,638**	**18,886**	**10,414**		**28,240**	**19,413**	**92,779**	**88,011**		**19,394**	**13,807**	**6,651**	**4,992**		**19,358**	**10,061**	**7,968**	**5,011**		**4,796**	**1,958**	**21,880**	**14,515**		**30,294**	**9,881**	**27,546**	**11,417**		**193,357**	**100,000**	**242,665**	**158,000**
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			
Alternative 5	**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**		**HU Capacity**	**HU Target**	**Jobs Capacity**	**Jobs Target**
Urban Centers	5,601	6,042	4,129	4,097	-	14,654	6,049	19,048	6,403	-	4,367	3,634	12,017	2,514		26,610	18,265	91,768	85,703		11,536	9,061	3,359	3,197		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		62,768	43,051	130,321	101,908
Hub Urban Villages	10,803	2,546	24,585	2,256	-	4,159	927	2,216	591	-	-	-	-	-		-	-	-	-		-	-	-	-		4,071	3,140	1,612	1,526		-	-	-	-		10,128	1,242	15,699	2,900		29,161	7,855	44,112	7,273
Residential Urban Villages	12,998	3,838	5,108	1,928	-	10,440	3,110	1,852	704	-	708	429	289	267		1,314	1,010	613	267		5,317	3,194	2,751	1,014		6,048	2,884	2,081	1,152		1,156	1,659	2,116	671		12,079	6,738	4,827	2,875		50,060	22,862	19,637	8,878
Manufacturing Industrial Centers	-	-	-	-	-	-	-	-	-	-	542	628	4,064	6,100		-	-	-	-		-	-	-	-		-	-	-	-		2,086	848	17,070	12,700		-	-	-	-		2,628	1,476	21,134	18,800
Growth Area (Maritime Industrial)	-	-	-	-	-	-	-	-	-	-	-	-	-	-		-	-	-	-		148	144	90	-		-	-	-	-		535	392	317	-		144	140	81	-		827	676	488	-
Neighborhood Anchor - Low Risk	2,399	4,495	2,199	1,893	-	4,811	5,127	1,455	1,799	-	953	2,002	741	707		-	-	-	-		942	2,830	186	510		669	1,406	207	333		-	-	-	-		159	446	35	92		9,933	16,306	4,823	5,334
Neighborhood Anchor - High Risk	-	-	-	-	-	-	-	-	-	-	-	-	-	-		-	-	-	-		-	-	-	-		1,373	2,083	1,485	1,101		377	461	690	443		452	791	160	194		2,202	3,335	2,335	1,738
Neighborhood Residential	4,033	1,885	6	6	-	5,487	2,569	84	84	-	591	310	4	4		-	-	-	-		395	240	-	-		3,777	1,878	14	14		-	-	-	-		3,716	1,966	2,988	3,005		17,999	8,848	3,096	3,113
Neighborhood Residential-Corridor	4,229	1,390	93	457	-	10,616	3,429	10	49	-	801	305	-	-		-	-	-	-		650	346	36	177		4,887	1,674	1	5		33	14	-	-		4,458	1,698	173	850		25,674	8,856	313	1,538
Outside Subareas (This Alternative)	-	-	-	-	-	-	-	-	-	-	-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-		-	-	-	-
Outside Subareas (No Change All Alternatives)	2,987	1,302	3,348	1,899	-	5,381	2,346	2,977	1,688	-	1,971	859	1,775	1,001		316	138	398	236		656	286	275	156		1,567	683	2,569	1,457		602	262	1,687	956		1,970	859	3,578	2,029		15,450	6,735	16,607	9,418
Total	**43,050**	**21,498**	**39,468**	**12,536**	-	**55,548**	**23,557**	**27,642**	**11,318**	-	**9,933**	**8,167**	**18,890**	**10,599**		**28,240**	**19,413**	**92,779**	**86,196**		**19,644**	**16,101**	**6,697**	**5,048**		**22,392**	**13,748**	**7,969**	**5,588**		**4,789**	**3,636**	**21,880**	**14,770**		**33,106**	**13,880**	**27,541**	**11,945**		**216,702**	**120,000**	**242,866**	**158,000**
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%					

Housing

	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5
Area 1 Northwest	17.2%	18.4%	17.6%	17.2%	17.9%
Area 2 Northeast	16.0%	18.3%	20.2%	21.0%	19.6%
Area 3 West	7.5%	8.1%	6.7%	6.6%	6.8%
Area 4 Downtown	24.3%	19.4%	19.4%	19.4%	16.2%
Area 5 East	16.6%	16.3%	13.8%	13.8%	13.4%
Area 6 Southwest	7.7%	9.4%	10.2%	10.1%	11.5%
Area 7 Duwamish Manufacturing Center	2.4%	2.3%	1.9%	2.0%	3.0%
Area 8 Southeast	8.3%	7.9%	10.2%	9.9%	11.6%
Total	100.0%	100.0%	100.0%	100.0%	100.0%

Jobs

	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5
Area 1 Northwest	7.5%	7.9%	7.8%	8.1%	7.9%
Area 2 Northeast	6.9%	7.4%	6.9%	6.9%	7.2%
Area 3 West	6.7%	6.9%	6.6%	6.6%	6.7%
Area 4 Downtown	57.4%	55.7%	55.7%	55.7%	54.6%
Area 5 East	3.0%	3.3%	3.1%	3.2%	3.2%
Area 6 Southwest	3.2%	3.5%	3.2%	3.2%	3.5%
Area 7 Duwamish Manufacturing Center	9.2%	9.2%	9.2%	9.2%	9.3%
Area 8 Southeast	6.1%	6.1%	7.7%	7.2%	7.6%
Total	100.0%	100.0%	100.0%	100.0%	100.0%

Square Footage

Using Job Targets 250 square feet

Commercial Square Feet

	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5
Area 1 Northwest	2,618,000	2,751,320	2,703,800	2,802,240	2,737,920
Area 2 Northeast	2,193,820	2,573,340	2,382,600	2,397,560	2,489,960
Area 3 West	1,803,167	1,868,067	1,778,967	1,776,767	1,817,467
Area 4 Downtown	19,961,240	19,362,420	19,362,420	19,362,420	18,961,120
Area 5 East	1,032,240	1,162,680	1,061,060	1,098,240	1,110,560
Area 6 Southwest	1,111,880	1,227,820	1,095,600	1,102,420	1,229,360
Area 7 Duwamish Manufacturing Center	2,134,397	2,107,917	2,122,217	2,122,517	2,178,358
Area 8 Southeast	2,120,140	2,311,940	2,467,940	2,511,760	2,627,900
Total	33,174,904	33,174,904	33,174,904	33,174,904	33,174,845
	132,700	132,700	132,700	132,700	132,699

Using Job Targets 700 square feet

Industrial Square Feet

	Alt 1	Alt 2	Alt 3	Alt 4	Alt 5
Area 1 Northwest	999,600	1,050,504	1,032,360	1,070,328	1,053,024
Area 2 Northeast	914,004	982,548	909,720	915,432	950,712
Area 3 West	2,324,932	2,349,712	2,315,692	2,314,852	2,330,392
Area 4 Downtown	7,621,572	7,392,924	7,392,924	7,392,924	7,240,464
Area 5 East	394,128	436,296	405,132	419,328	424,032
Area 6 Southwest	424,536	468,804	418,320	420,924	469,392
Area 7 Duwamish Manufacturing Center	4,221,988	4,220,332	4,217,452	4,217,452	4,238,840
Area 8 Southeast	2,120,140	2,311,940	2,467,940	2,511,760	2,627,900
Total	17,710,268	17,710,268	17,710,268	17,710,268	17,710,246
	25,300	25,300	25,300	25,300	25,300

	Split %Com	%Ind
SIML	54%	46%
General	88%	12.0%

SIML and UGC Jobs/Sq Ft
SIML Job Splits in MIC
Citywide excluding SIML 88% comm and 12% ind per Census On the Map 2019

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 StrategyEmployment 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 jot

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

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

Land Use	Industry	Ballard	Interbay/ Dravus	Interbay/ SmithCove	SODO/ Stadium	South Park/ Georgetown
Other	Hospitality & Tourism	1,400	1,400	1,200	1,000	700
Ind	Construction and Utilities	850	1,400	1,571	1,000	700
Com & Off	ICT	365	900	577	571	529
Ind	Distribution & Commerce	850	1,400	1,571	1,000	700
Ind	Food & Beverage Production	850	1,400	1,571	1,000	700
Ind	Aerospace	850	1,400	1,571	1,000	700
Ind	Transportation & Logistics	850	1,400	1,571	1,000	700
Ind	Maritime	850	1,400	1,571	1,000	700
Ind	Other Manufacturing	850	1,400	1,571	1,000	700
Com & Off	All Other Retail	365	900	577	571	529
Com & Off	All Other Services	365	900	577	571	529
Gov & Ed	Government	1,000	1,000	1,000	429	371
Gov & Ed	Education	1,000	1,000	1,000	429	371

SECTOR SPLITS: CAI, September 1, 2020: Seattle Maritime and Industrial StrategyEmployment 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 CAGR	2018-2035 Growth
All Other Services	209,800	232,600	249,500	280,400	0.7%	30,900
Hospitality & Tourism	52,800	63,400	70,800	95,300	1.8%	24,500
Distribution & E-commerce	20,500	38,700	60,400	104,400	3.3%	44,000
Education	58,900	66,500	59,000	58,400	-0.1%	-600
ICT	23,900	36,000	50,400	129,400	5.7%	79,000
Government	48,700	46,600	49,400	49,000	0.0%	-400
Construction and Utilities	23,200	27,400	34,400	52,900	2.6%	18,500
All Other Retail	21,900	23,400	23,000	24,500	0.4%	1,500
Food & Beverage Productio	13,100	15,900	16,500	22,600	1.9%	6,100
Maritime	16,500	15,100	15,600	15,900	0.1%	300
Other Manufacturing	10,900	11,200	10,600	8,300	-1.4%	-2,300
Transportation & Logistics	7,200	7,700	9,100	11,800	1.5%	2,700
Aerospace	9,500	8,700	7,900	7,900	0.0%	0
Suppressed	100	100	200	200	0.0%	0
Total	517,100	593,000	656,800	861,000	1.6%	204,200

Estimate 2035 Share by Jobs and apply?

Commercial	
Commercial	
Industrial	
Commercial	
Commercial	
Commercial	
Industrial	
Commercial	
Industrial	
Industrial	
Industrial	
Industrial	
Industrial	

SIML Emp SF

Base Year Split	Industrial	Non-Industrial
BINMIC	6,783,129	5,375,837
Greater Duwamish	34632076	13,896,776
Total	**41,415,205**	**19,272,613**

Preferred Alternative - Balanced	Gross	
Industrial Emp	**Total Emp**	**% Industrial**
70,853	134,045	52.9%
Preferred Alternative - Balanced	**Net**	
16,253	35,545	45.7%

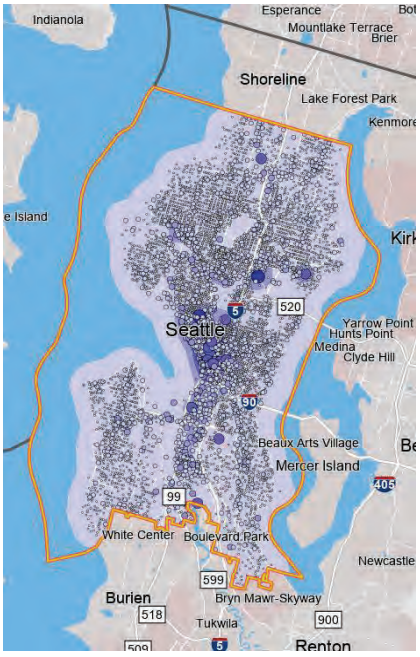
Industrial	Commercial
46%	54%

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

SECTOR SPLITS: Census on the Map, Total Jobs

Jobs by NA	Citywide 2019		SIML 2019		Citywide Minus SIML 2019
	Count	Share	Count	Share	
Agriculture,	1,261	0.2%	741	1.0%	520
Mining, Qua	135	0.0%	48	0.1%	87
Utilities	3,312	0.6%	168	0.2%	3,144
Constructior	24,590	4.2%	6,653	8.9%	17,937
Manufacturi	27,519	4.7%	16,482	22.2%	11,037
Wholesale T	20,904	3.6%	7,200	9.7%	13,704
Retail Trade	40,787	7.0%	4,593	6.2%	36,194
Transportati	23,520	4.0%	6,334	8.5%	17,186
Information	36,909	6.3%	4,143	5.6%	32,766
Finance and	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
Managemer	18,644	3.2%	7,103	9.5%	11,541
Administratic	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, Enterta	14,268	2.4%	2,219	3.0%	12,049
Accommoda	55,410	9.5%	4,955	6.7%	50,455
Other Servic	26,194	4.5%	2,357	3.2%	23,837
Public Admi	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%

								Vehicle Mix		Distance from Centerline of Roadway			
				Median	ADT	Speed	Alpha	Medium	Heavy	CNEL at	Distance to Contour			
#	Roadway	Segment	Lanes	Width	Volume	(mph)	Factor	Trucks	Trucks	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/Alki 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

[1] 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%

								Vehicle Mix		Distance from Centerline of Roadway			
				Median	ADT	Speed	Alpha	Medium	Heavy	CNEL at	Distance to Contour			
#	Roadway	Segment	Lanes	Width	Volume	(mph)	Factor	Trucks	Trucks	59.0	70 CNEL	65 CNEL	60 CNEL	55 CNEL
1	Martin Luther King Jr Way S	Between S Jackson St and S Massach	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

[1] 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%

								Vehicle Mix		Distance from Centerline of Roadway				
				Median	ADT	Speed	Alpha	Medium	Heavy	CNEL at	Distance to Contour			
#	Roadway	Segment	Lanes	Width	Volume	(mph)	Factor	Trucks	Trucks	150 Feet	70 CNEL	65 CNEL	60 CNEL	55 CNEL
1	Martin Luther King Jr Way S	Between S Jackson St and S Massacl	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

[1] 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%

								Vehicle Mix		Distance from Centerline of Roadway				
				Median	ADT	Speed	Alpha	Medium	Heavy	CNEL at	Distance to Contour			
#	Roadway	Segment	Lanes	Width	Volume	(mph)	Factor	Trucks	Trucks	150 Feet	70 CNEL	65 CNEL	60 CNEL	55 CNEL
1	Martin Luther King Jr Way S	Between S Jackson St and S Massacl	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

[1] 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%

								Vehicle Mix		Distance from Centerline of Roadway				
				Median	ADT	Speed	Alpha	Medium	Heavy	CNEL at	Distance to Contour			
#	Roadway	Segment	Lanes	Width	Volume	(mph)	Factor	Trucks	Trucks	150 Feet	70 CNEL	65 CNEL	60 CNEL	55 CNEL
1	Martin Luther King Jr Way S	Between S Jackson St and S Massacl	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

[1] 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%

									Vehicle Mix		Distance from Centerline of Roadway		
				Median	ADT	Speed	Alpha	Medium	Heavy	CNEL at	Distance to Contour			
#	Roadway	Segment	Lanes	Width	Volume	(mph)	Factor	Trucks	Trucks	150 Feet	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/Alki 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 Columb	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

[1] 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
Neighborhood Residential 1, 2, and 3 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.
Neighborhood Residential Small Lot 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.
Lowrise Multifamily LR1, LR2, and LR3	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.[1] Lowrise 2 (LR2): Areas characterized by multifamily housing types in existing small-scale multi-family neighborhoods with arterial streets. Most appropriate within Growth Areas.[1] 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.[1] 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.
Midrise Multifamily 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.
Highrise Multifamily 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
	highrise 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.
Seattle Mixed SM	The Seattle Mixed zone provides for a wide range of uses to encourage mixed-use neighborhoods.
Neighborhood Commercial NC1, NC2, and NC3	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. 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. 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. 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.
Commercial C1 and C2	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. 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.
Downtown DH1, DH2, DMC, DMR, DOC1, DOC2, and DRC	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. 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. 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.

Zoning Designation	Description
	Downtown Office Core (DOC1 and DOC2): 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). Downtown Retail Core (DRC): 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.
Pike Market Mixed 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.
Pioneer Square Mixed PSM	Applies to areas within the Pioneer Square Preservation District (see also Special Review Districts in **App Exhibit G.1-2**). 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.
International District Mixed and Residential IDM and IDR	Applies to areas within the International Special Review District (see also Special Review Districts in **App Exhibit G.1-2**). 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.
Industrial MML, II, UI, IC	Maritime Manufacturing and Logistics (MML): The MML zone is intended to provide long term predictability to landowners, business owners and investors that the area will remain an industrial area. Industry and Innovation (II): 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. Urban Industrial (UI): 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. Industrial Commercial (IC): 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.

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
Shoreline Districts	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.
Station Area Overlay District	The Station Area Overlay District regulates land use and development in a manner that supports transit-oriented development near light rail stations.
Airport Height Overlay District	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).
Special Review Districts	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.
Southeast Seattle Reinvestment Area	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.
Major Institution Overlay District	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.
Northgate Overlay District	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.
Sand Point Overlay District	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.
Pike/Pine Conservation Overlay District	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.
Stadium Transition Area Overlay District	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
STAOD	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.
Master Planned Communities 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 1	2	3	4	5	6	7	8	Citywide
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%)	—	**3,726 ac. (6.4%)**
Hub Urban Village	1,080 ac. (10.4%)	138 ac. (1.3%)	—	—	—	269 ac. (2.9%)	—	447 ac. (5.4%)	**1,934 ac. (3.3%)**
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%)	**4,362 ac. (7.5%)**
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%)	—	**6,426 ac. (11.1%)**
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%)	**29,810 ac. (51.5%)**
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%)	**2,945 ac. (5.1%)**
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%)	**1,849 ac. (3.2%)**
Industrial Areas	—	—	10 ac. (0.2%)	—	—	—	—	18 ac. (0.2%)	**10 ac. (0.0%)**
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%)	**683 ac. (1.2%)**
Cemetery	156 ac. (1.5%)	46 ac. (0.4%)	28 ac. (0.4%)	—	38 ac. (0.7%)	15 ac. (0.2%)	—	—	**284 ac. (0.5%)**
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%)	**5,927 ac. (10.2%)**
Total Acres & Percent of Citywide Total	**10,381 ac. (18%)**	**10,879 ac. (19%)**	**6,649 ac. (11%)**	**1,799 ac. (3%)**	**5,154 ac. (9%)**	**9,228 ac. (16%)**	**5,606 ac. (10%)**	**8,214 ac. (14%)**	**57,908 ac. (100%)**

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

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

	EIS Analysis Area								
Generalized Zoning	1	2	3	4	5	6	7	8	Citywide
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%)	**35,364 ac. (61.0%)**
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%)	**1,361 ac. (2.3%)**
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%)	**6,030 ac. (10.4%)**
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%)	**655 ac. (1.1%)**
Highrise Multifamily	—	—	—	—	96 ac. (1.9%)	—	—	—	**96 ac. (0.2%)**
Seattle Mixed	—	125 ac. (1.1%)	281 ac. (4.2%)	304 ac. (16.9%)	—	—	—	76 ac. (0.9%)	**785 ac. (1.4%)**
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%)	**2,971 ac. (5.1%)**
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%)	**1,561 ac. (2.7%)**
Downtown	—	—	—	739 ac. (41.1%)	—	—	—	—	**739 ac. (1.3%)**
Pike Market	—	—	—	25 ac. (1.4%)	—	—	—	—	**25 ac. (0.0%)**
Pioneer Square	—	—	—	102 ac. (5.7%)	—	—	3 ac. (0.0%)	—	**105 ac. (0.2%)**
International District	—	—	—	102 ac. (5.7%)	—	—	—	—	**103 ac. (0.2%)**
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%)	—	**6,838 ac. (11.8%)**
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%)	**1,259 ac. (2.2%)**
Master Planned Community	—	—	—	3 ac. (0.2%)	40 ac. (0.8%)	—	—	—	**43 ac. (0.1%)**
Total Acres & Percent of Citywide Total	**10,379 ac. (18%)**	**10,896 ac. (19%)**	**6,649 ac. (11%)**	**1,799 ac. (3%)**	**5,153 ac. (9%)**	**9,229 ac. (16%)**	**5,613 ac. (10%)**	**8,217 ac. (14%)**	**57,934 ac. (100%)**

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 1	2	3	4	5	6	7	8	Citywide
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%)
Total Acres & Percent of Citywide Total	**1,045 ac. (14%)**	**761 ac. (10%)**	**1,772 ac. (24%)**	**390 ac. (5%)**	**513 ac. (7%)**	**1,102 ac. (15%)**	**1,185 ac. (16%)**	**678 ac. (9%)**	**7,447 ac. (100%)**

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 1	2	3	4	5	6	7	8	Citywide
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%)	**3,360 ac. (8.4%)**
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%)	**2,007 ac. (5.0%)**
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%)	**3,483 ac. (8.7%)**
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%)	**19,005 ac. (47.7%)**
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%)	**4,240 ac. (10.7%)**
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%)	**5,471 ac. (13.7%)**
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%)	**2,094 ac. (5.3%)**
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%)	**143 ac. (0.4%)**
Total Acres & Percent of Citywide Total	**7,151 ac. (18%)**	**8,087 ac. (20%)**	**4,075 ac. (10%)**	**1,033 ac. (3%)**	**3,332 ac. (8%)**	**6,411 ac. (16%)**	**4,056 ac. (10%)**	**5,656 ac. (14%)**	**39,802 ac. (100%)**

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.

Maximum density	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
Floor area ratio (FAR)	The amount of floor area allowed is equal to the lot size times the FAR. Proposed FARs are: • 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) • 1.2 FAR for density of at least 1/1,600 sq ft (e.g., four units on a 5,000 sq ft lot)
Lot coverage	50 percent
Height limit	• 3 stories for market-rate development • 4 stories for development with income-restricted affordable homes
Minimum open space requirement	• 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.
Minimum setbacks and separations	• 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 • 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 feet in width
Accessory dwelling units	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

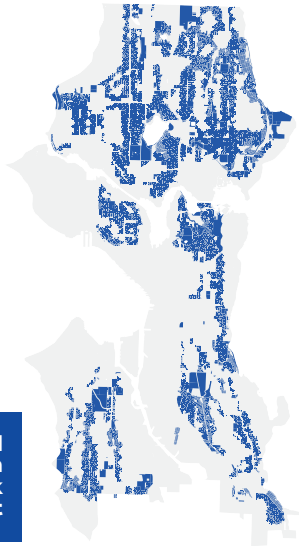
Neighborhood Residential zones are some of the most expensive and exclusive areas of Seattle. The updated Neighborhood Residential zones would help address this pattern by increasing housing supply overall and allowing smaller housing types in particular. But most new market-rate housing in these areas 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:

Maximum height	4 stories
Maximum lot coverage	60 percent
Maximum density	1 unit per 400 square feet of lot area
Floor area ratio (FAR)	1.8
Affordability requirement	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



Ballard Flats
Architecture and photography credit: BUILD LLC

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.

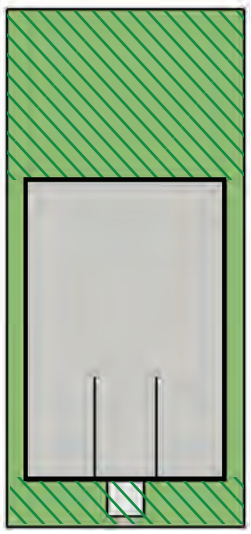


Street-level view

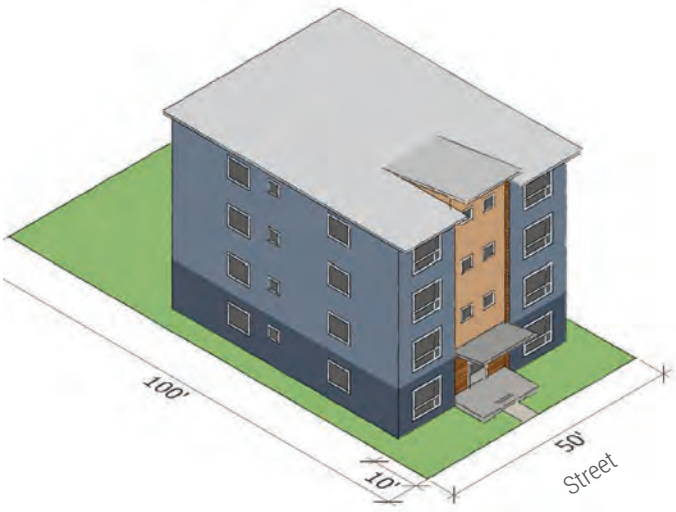


Existing precedent

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

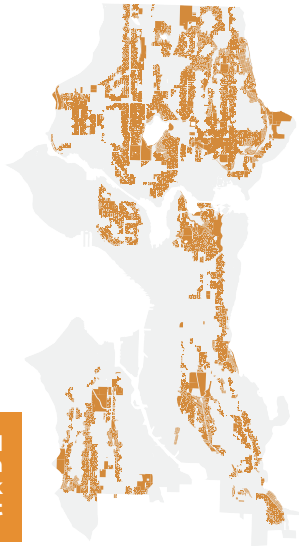
Stacked flats are a housing type where each unit is on one level. They can be offered as apartments for rent or created as condominiums sold to homebuyers.

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:

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



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

STACKED FLATS WITH BONUS

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

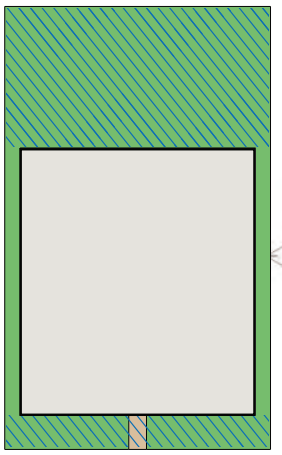


Street-level view

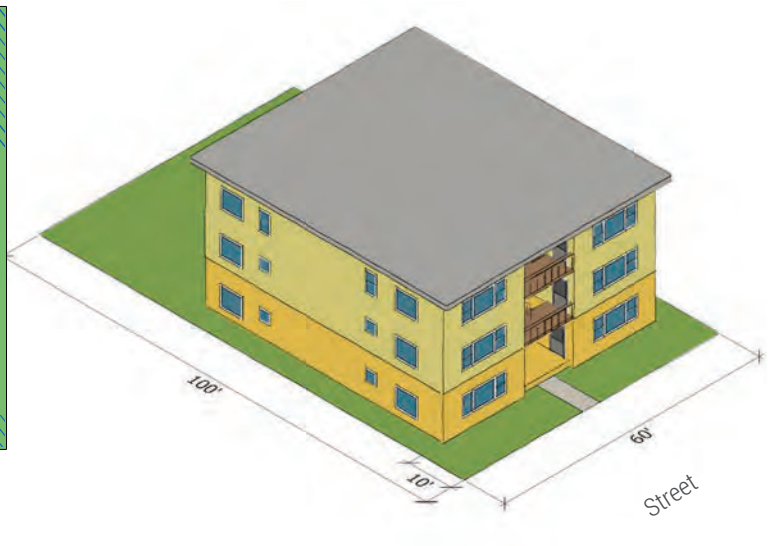


Existing precedent

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



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:

Setback and separations	• Reduced setback of two feet from street lot lines for commercial spaces on the ground floor • Upper floors required to set back 10 feet
Height and noise	• Two additional feet of height for the ground floor to allow for taller ceilings and additional soundproofing for residential use above



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.

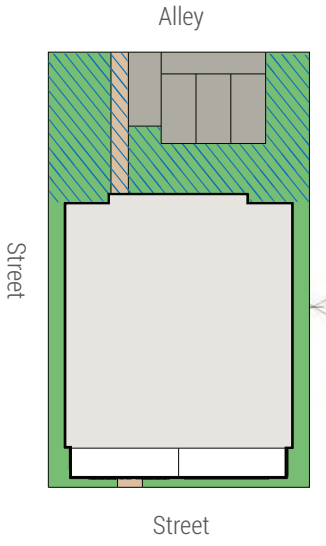


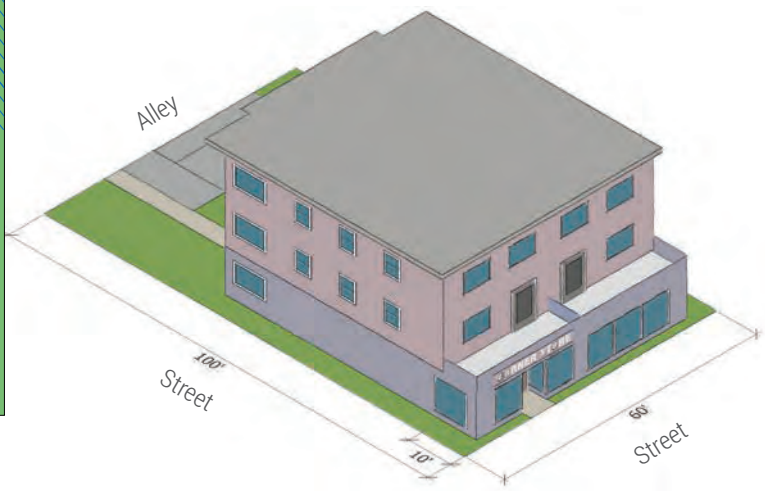
Street-level view



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 monotous 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.oneseattleplan.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.

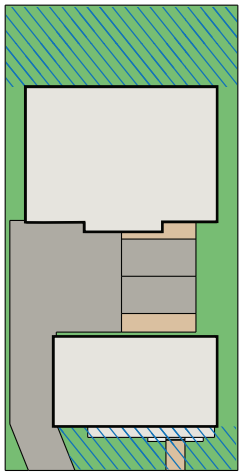


Street-level view

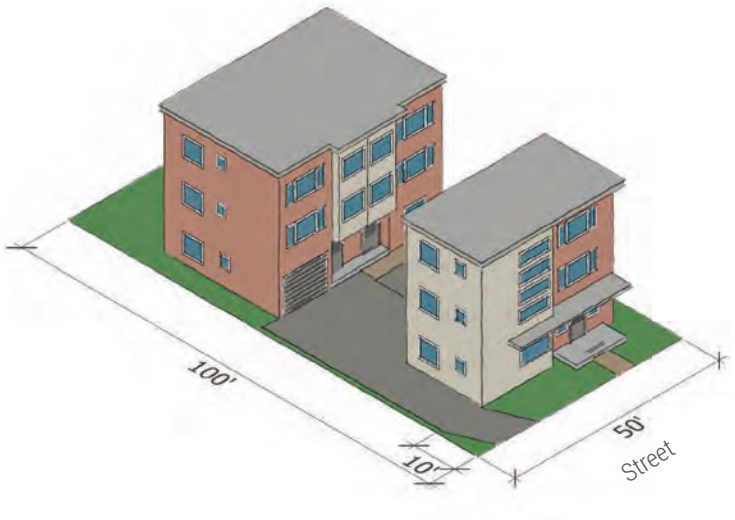


Existing precedent

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.

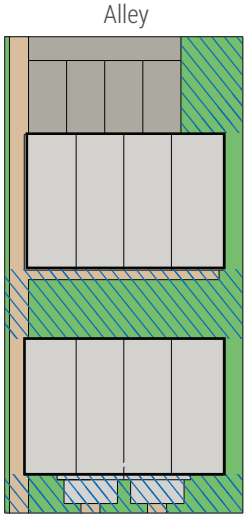


Street-level view



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.

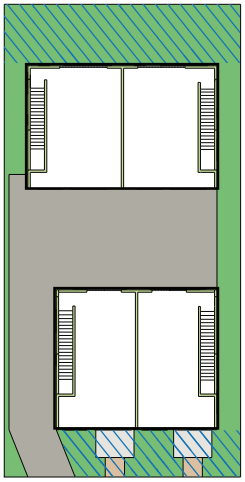


Street-level view

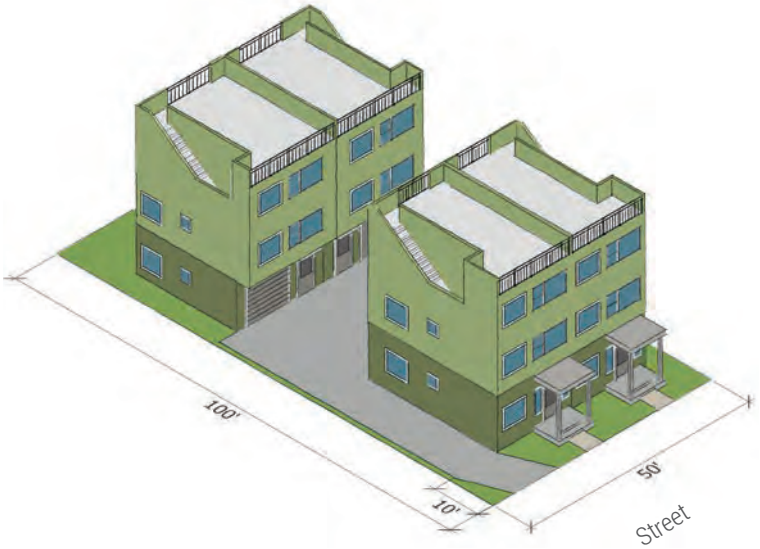


Existing precedent

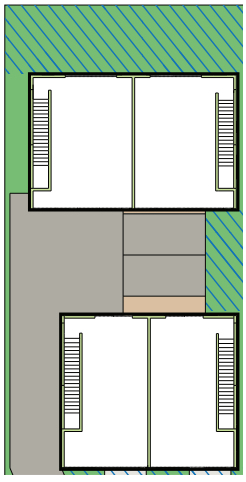
Total units	4
Floor area ratio (FAR)	1.2
Average unit size	1,500
Stories	3
Lot size	5,000
Building coverage	40%
Usable open space	20%
Building plus paving	73%
Parking spaces	4



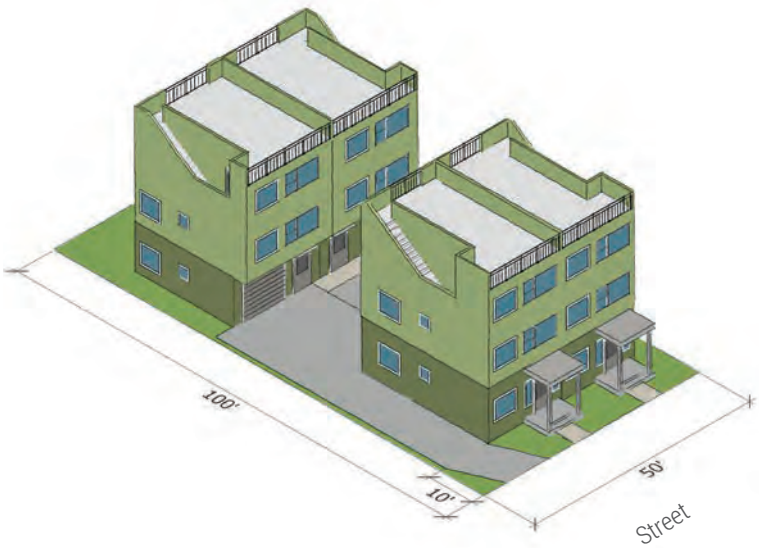
Street



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.

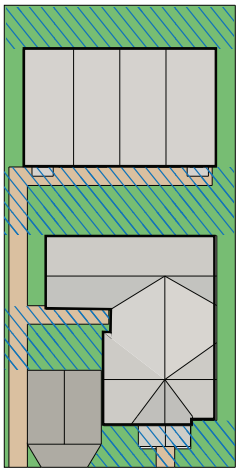


Street-level view



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.



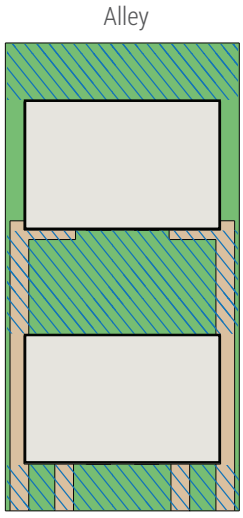
Street-level view



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[1]	0

[1] 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

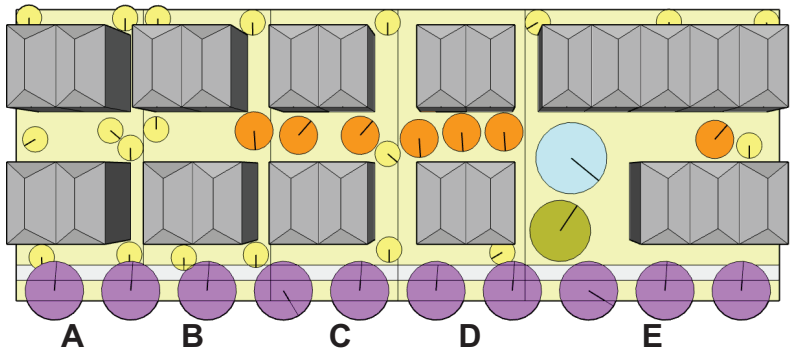
- Tree Size: Use tree canopy sizes developed by SDCI and SDOT arborist for 2016 analysis
    - Mature canopy sizes based on city street tree list
    - Tree canopy at 25 years assumed to be about half the area of mature canopy
- Number of Street trees: Use results of analysis of 11 RSL plan set which 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	
Small 8-15' canopy spread* 10' shown	**Small-Med.** 16-20' canopy spread* 16' shown	**Med.-Large** 21-25' canopy spread* 24' shown	**Large** 26-30' canopy spread* 28' shown	**Preserved** Assumes 10" diameter trunk 30' shown	**Street Tree** Assumes Medium-Large* 23' shown	* Assumed canopy spread at 25 years

2 Duplexes No Parking (Prototype 4)



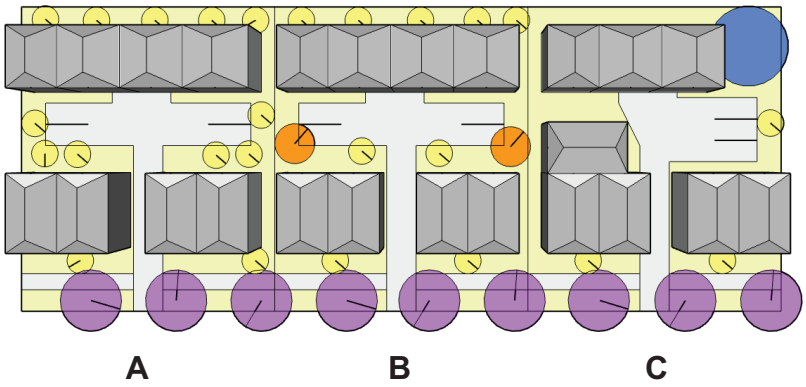
Calculations

- 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 requrement to be met comfortably.

Duplexes / Fourplexes, Garage and Surface Parking (Prototype 2C with combined lots)



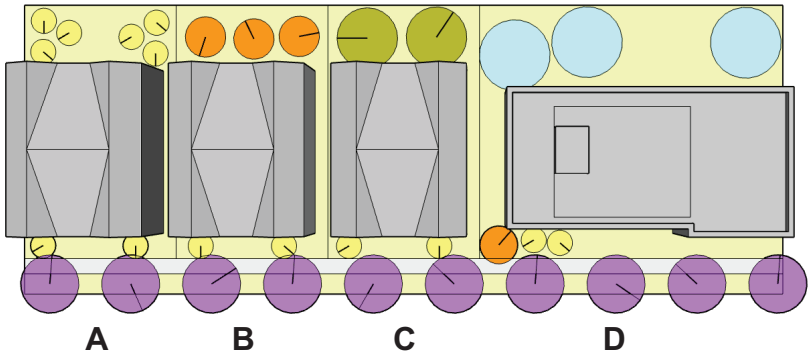
Calculations

- 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 requrement to be met comfortably.

DRAFT Neighborhood Residential (NR) Proposed Tree Requirement
25-Year Canopy Growth

Tree Size	Small	Small-Medium	Medium-Large	Large	Preserved	Total Points
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%**					

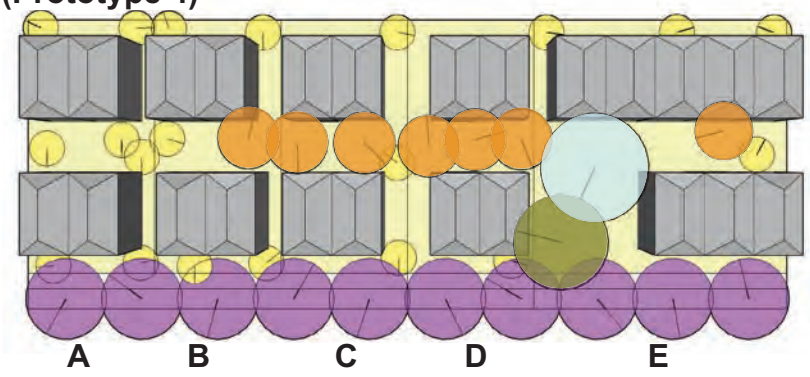
Stacked Flats No Parking (Prototpye 6)						
Model Lot						
A	8					8
B	2	3				8
C	2		2			8
D	2	1		3		16
Half Block Total Area	34,200	sq. ft				
Street Trees	10					
Half Block Canopy Area	8,669					
Canopy Coverage	**25.3%**					

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	
						
Small 8-15' canopy spread* 10' shown	**Small-Med.** 16-20' canopy spread* 16' shown	**Med.-Large** 21-25' canopy spread* 24' shown	**Large** 26-30' canopy spread* 28' shown	**Preserved** Assumes 10" diameter trunk 30' shown	**Street Tree** Assumes Medi-um-Large* 23' shown	* Assumed can-opy spread at 25 years

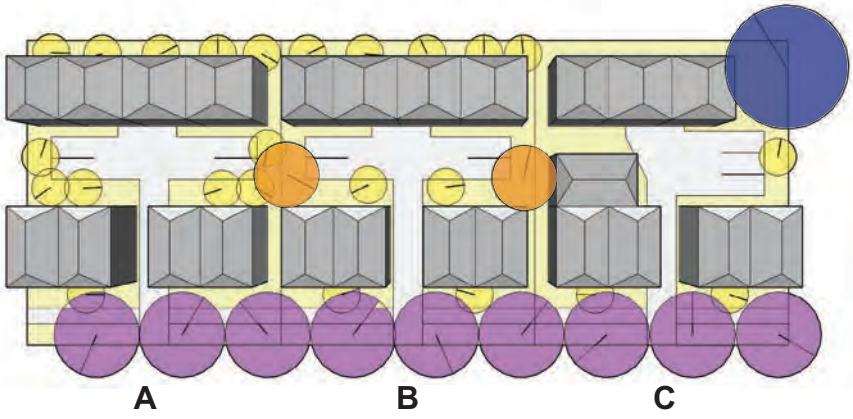
2 Duplexes No Parking (Prototype 4)



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.

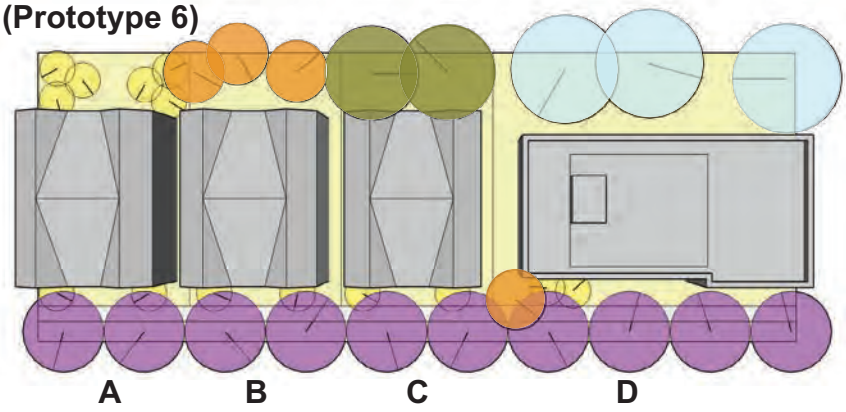
Duplexes / Fourplexes, Garage and Surface Parking (Prototype 2C with combined lots)



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	Small	Small-Medium	Medium-Large	Large	Preserved	Total Points
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	14,730					
Canopy Coverage	**43.1%**					

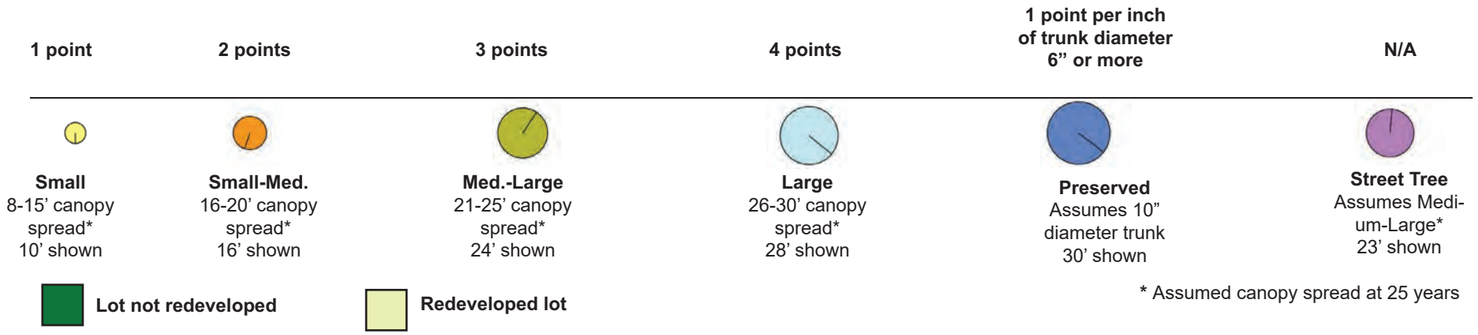
Duplexes / Fourplexes, Garage and Surface Parking (Prototype 2C with combined lots)						
Model Lot						
A	13					13
B	9	2				13
C	3				1	13
Half Block Total Area	34,200	sq. ft.				
Street Trees	6					
Half Block Canopy Area	12,327					
Canopy Coverage	**36.0%**					

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	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

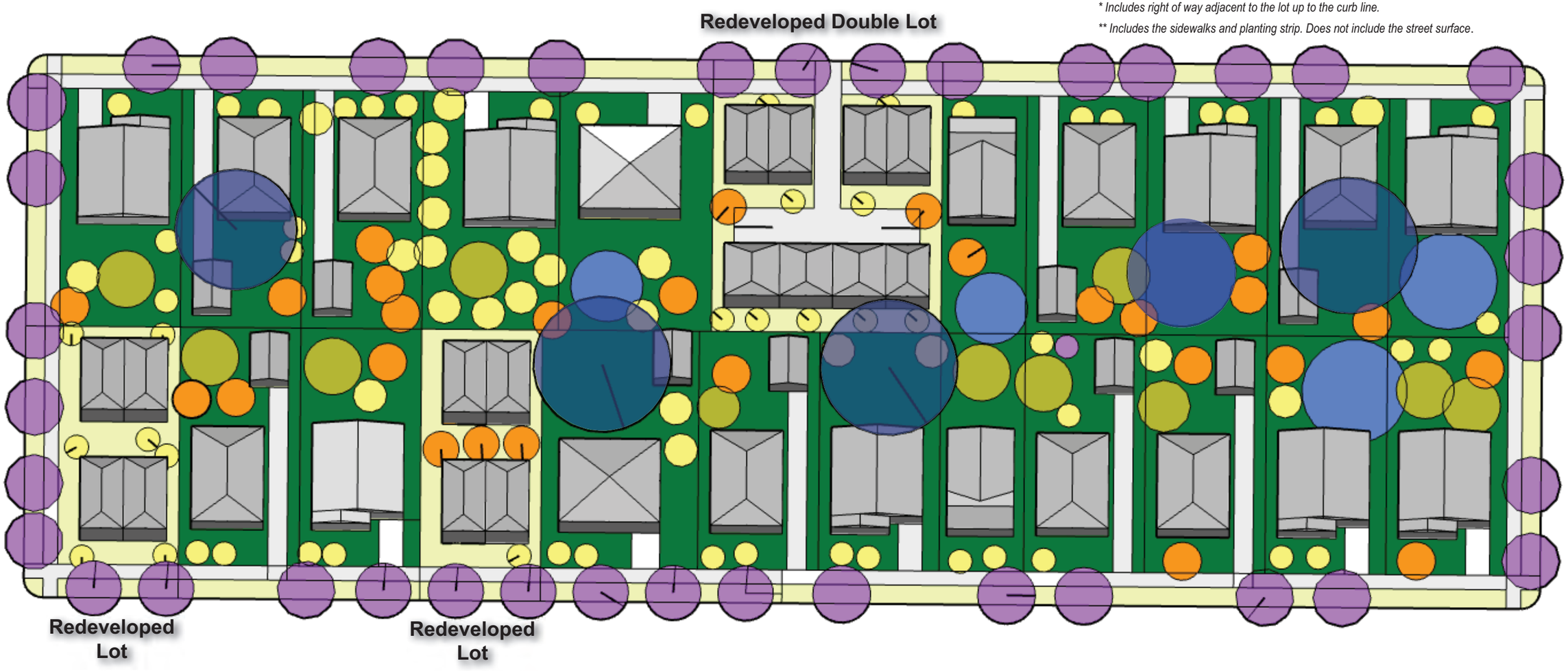
- 5,000 sq. ft. lots: 7 pts. required for high density; 10 pts. for low density
- 6,000 sq. ft. lots: 8 pts. required for high density; 12 pts. for low density
- Lots that are not redeveloped have existing canopy coverage of 12% - 46% consistent with existing conditions on blocks observed in aerial photos 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.

** 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
Total	**80,000**		**1,485.06**

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
Total	**100,000**		**1,655.44**

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
Total	**100,000**		**2,489.69**

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
Total	**100,000**		**2,003**

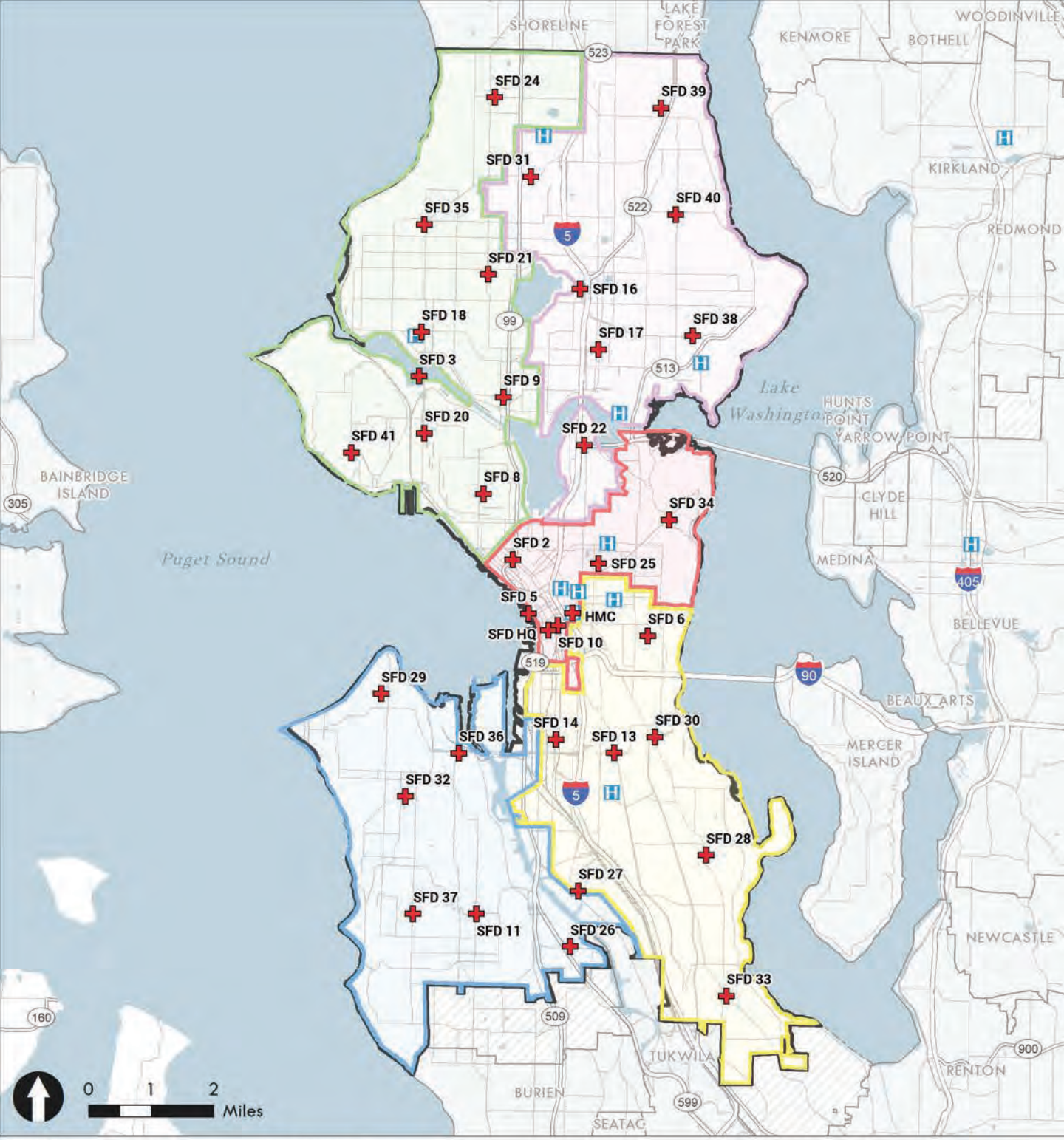
Alternative 5	Net New Housing Units	Land Developed per Net New Unit (sq. ft.)	Estimated Parcel Acres Developed
Urban Centers	43,051	642	634.17
Hub Urban Villages	7,855	642	115.71
Residential Urban Villages	22,862	642	336.77
Manufacturing Industrial Centers	1,476	642	21.74
Growth Area (Maritime Industrial)	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
Total	**120,000**		**2,344.95**

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
Total	**120,000**		**2,770.14**

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	-	10	52	64	79	0.66	0.81	0	0%
17	0	-	0	-	-	0.00	0	-	9	48	68	79	0.60	0.86	0	0%
18	0	-	0	-	-	0.00	0	-	9	45	60	76	0.60	0.88	0	0%
19	0	-	0	-	-	0.00	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	-	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	-	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	-	8	39	53	79	0.49	0.67	0	0%
57	0	-	0	-	-	0.00	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	-	9	41	53	51	0.81	1.04	1	11%
64	0	-	0	-	-	0.00	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	-	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	-	11	48	63	78	0.62	0.81	0	0%
77	0	-	0	-	-	0.00	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

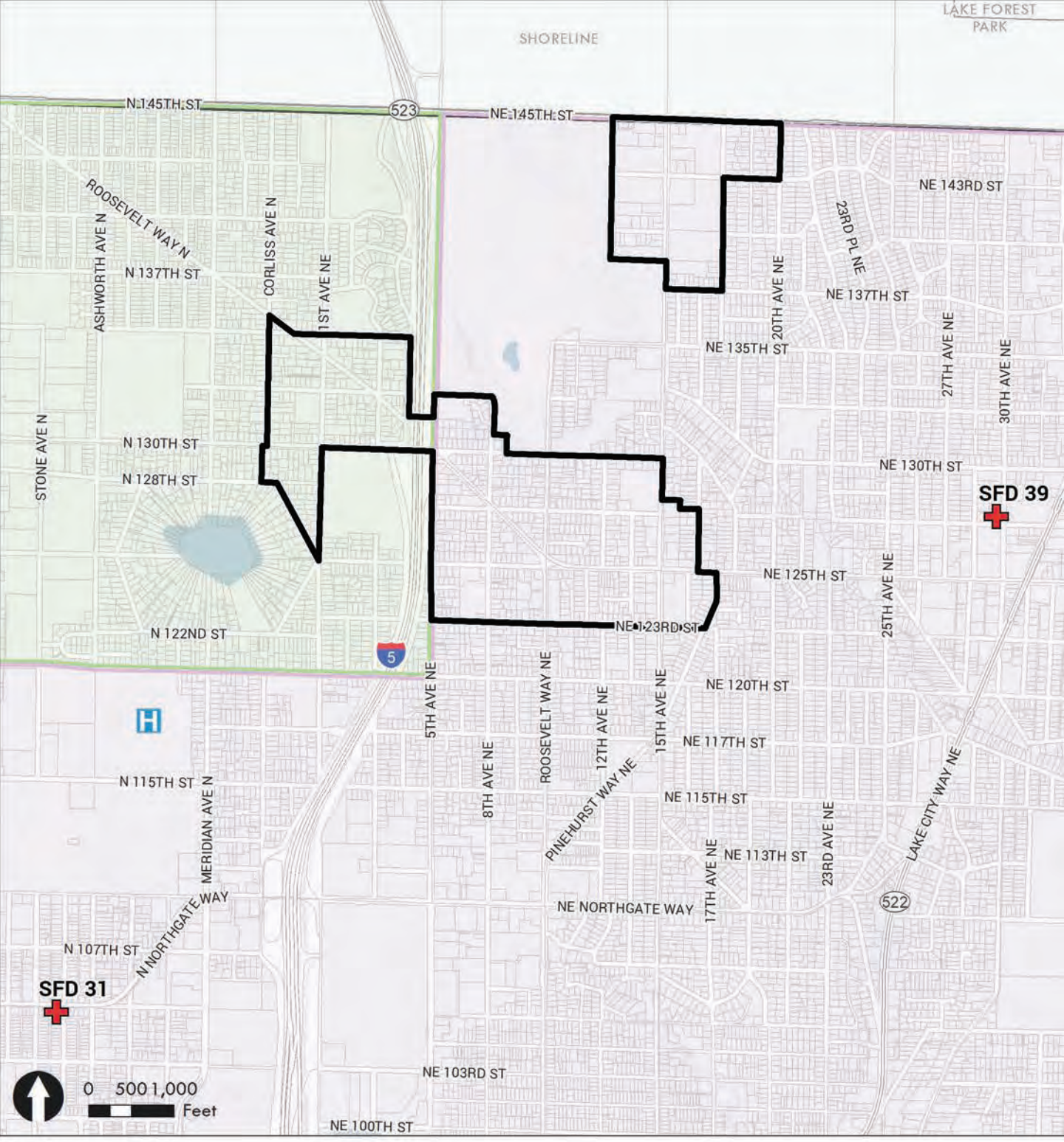


City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Fire Station
Hospital

Fire Battalions

Battalion 2
Battalion 4
Battalion 5
Battalion 6
Battalion 7

Map Date: February 2023

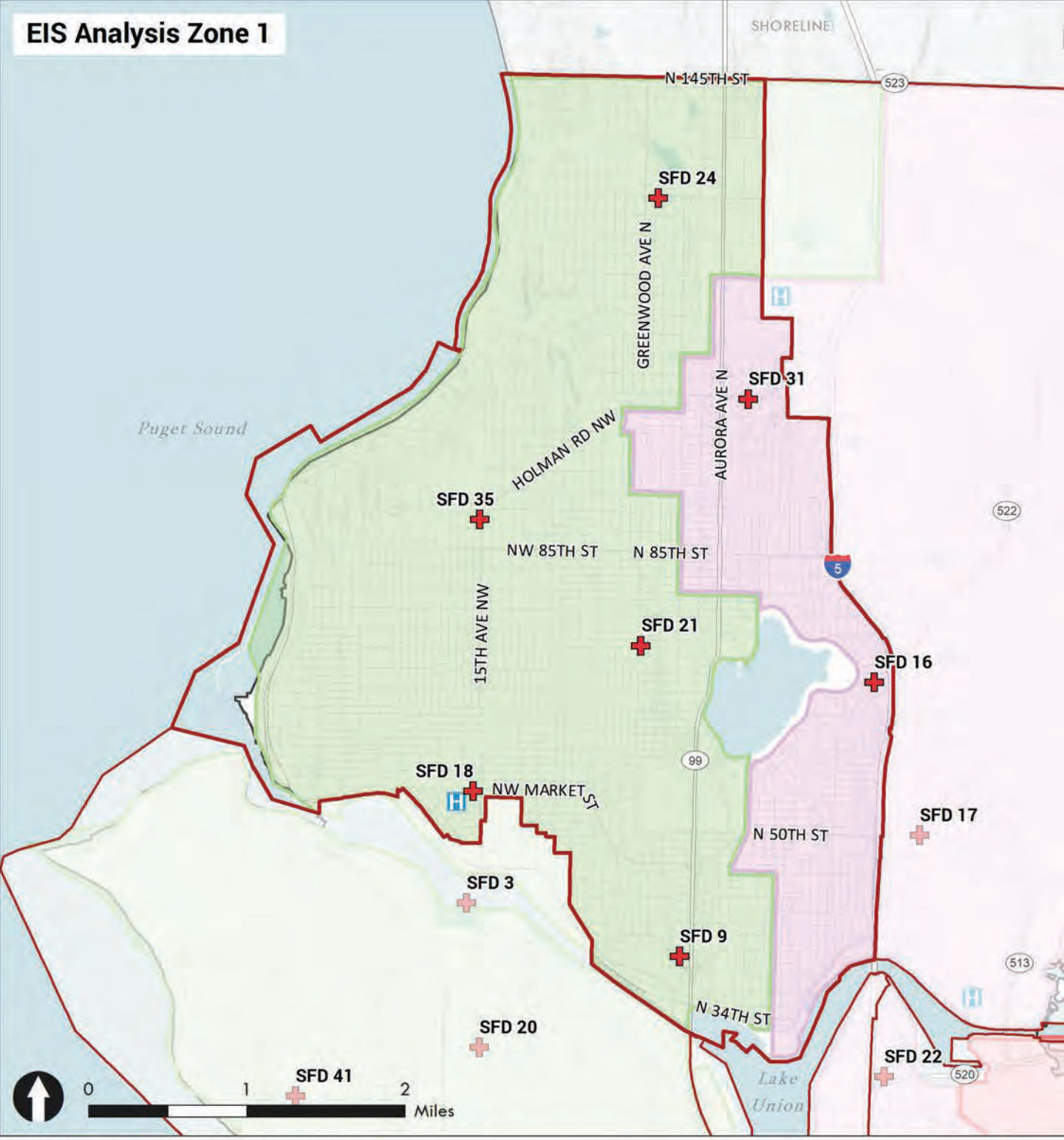


City of Seattle
Urban Growth Areas
Other Cities
130th/145th Station Areas
Fire Station
Hospital

Fire Battalions

Battalion 2
Battalion 4
Battalion 5
Battalion 6
Battalion 7

Map Date: March 2023



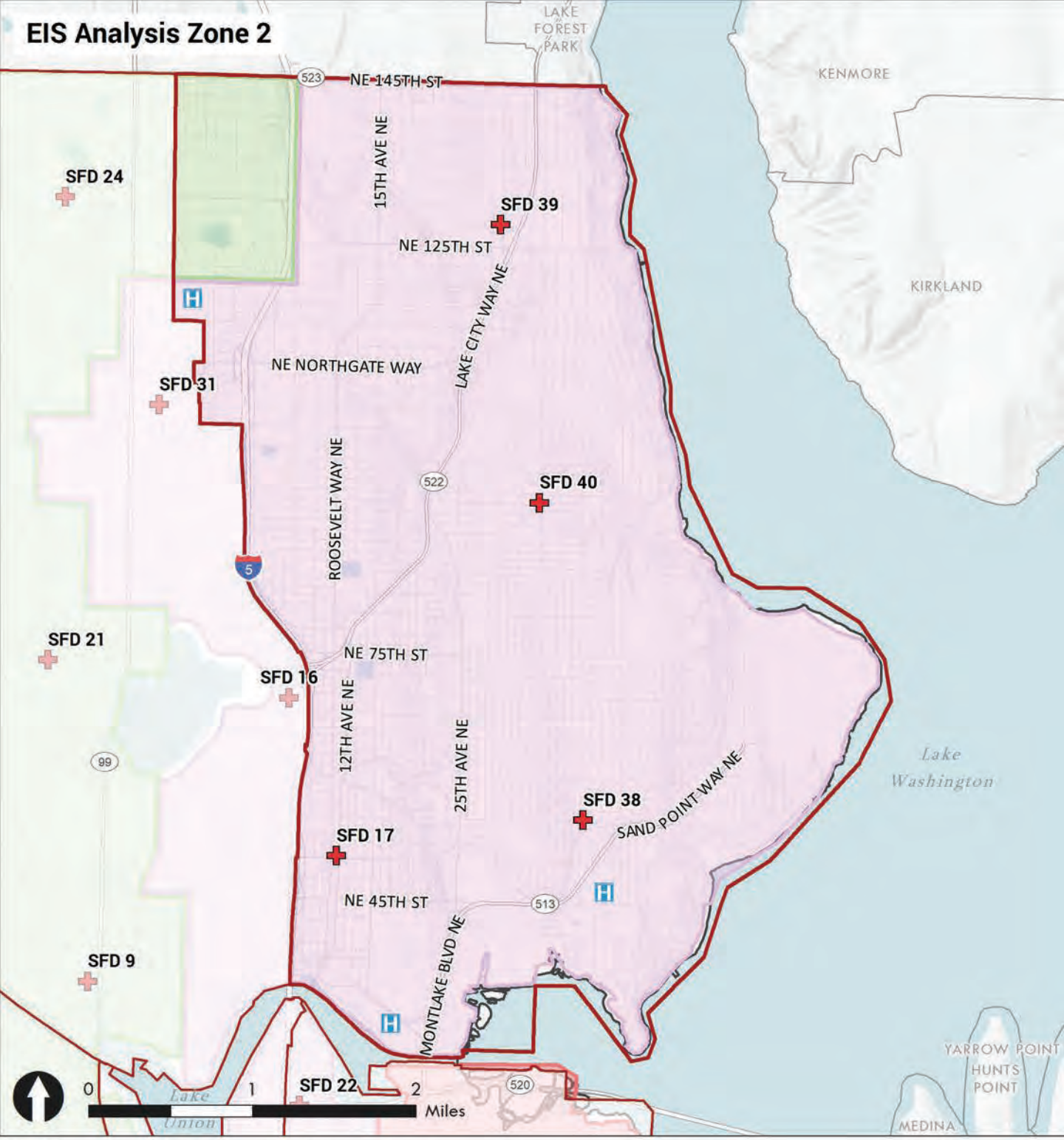
- City of Seattle
- Urban Growth Areas
- Other Cities
- Analysis Zones
- Fire Station
- Hospital

Fire Battalions

- Battalion 2
- Battalion 4
- Battalion 5
- Battalion 6
- Battalion 7



Map Date: February 2023



- City of Seattle
- Urban Growth Areas
- Other Cities
- Analysis Zones
- Fire Station
- Hospital

Fire Battalions

- Battalion 2
- Battalion 4
- Battalion 5
- Battalion 6
- Battalion 7

Map Date: February 2023



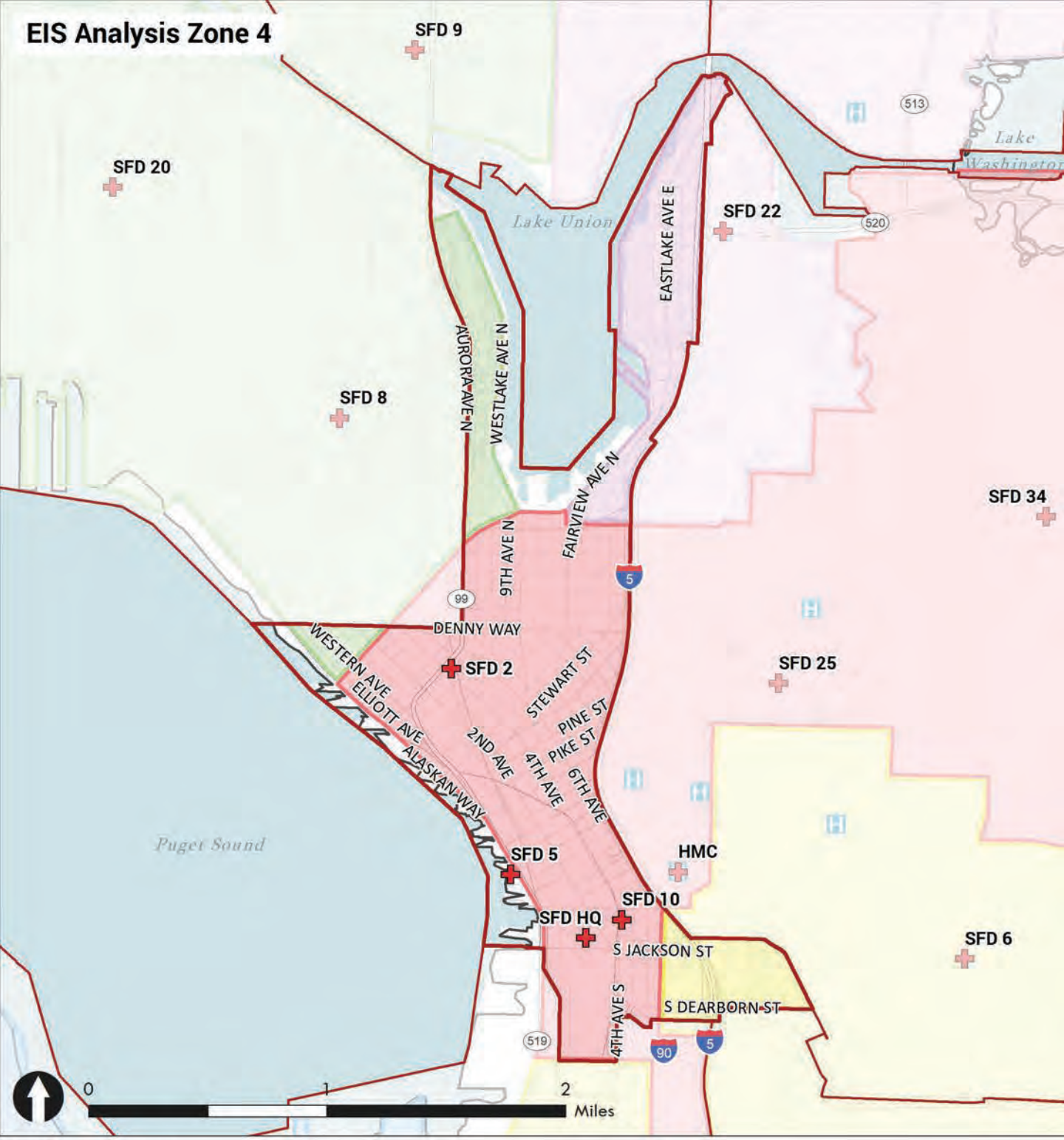
City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Fire Station
Hospital

Fire Battalions

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Battalion 4
Battalion 5
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Battalion 7



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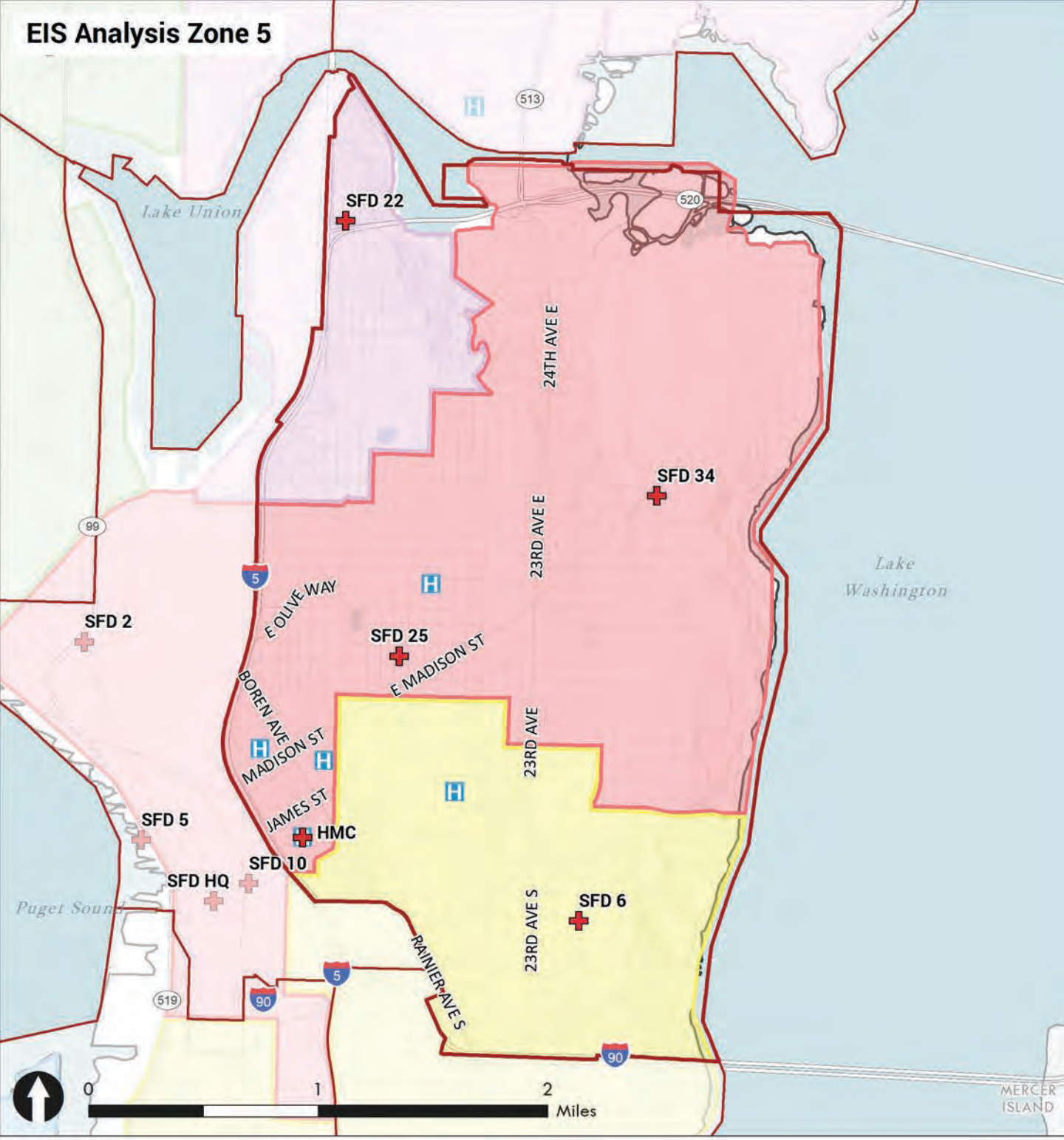
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Hospital

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Battalion 5
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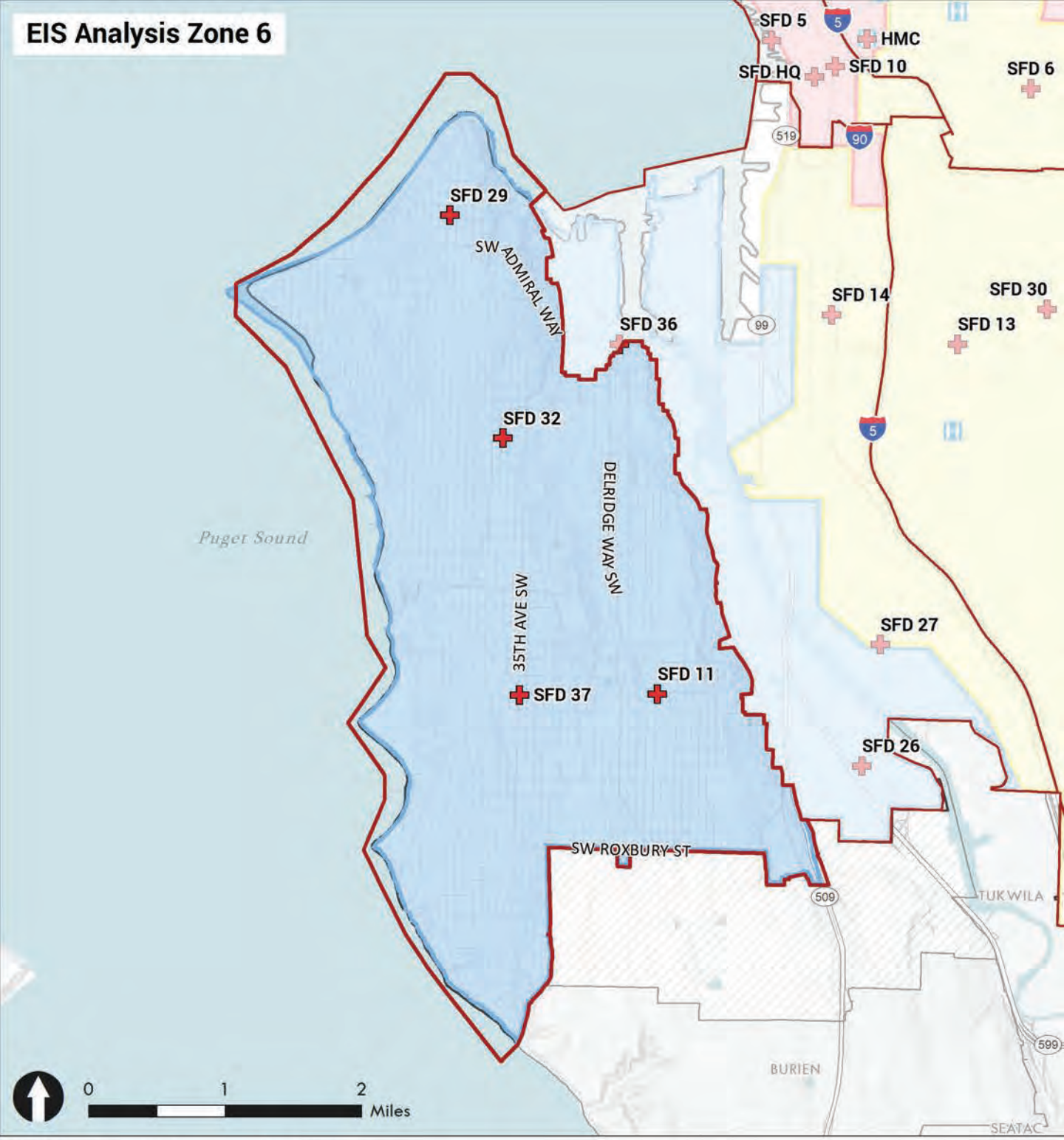


City of Seattle
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Hospital

Fire Battalions

Battalion 2
Battalion 4
Battalion 5
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Battalion 7

Map Date: February 2023



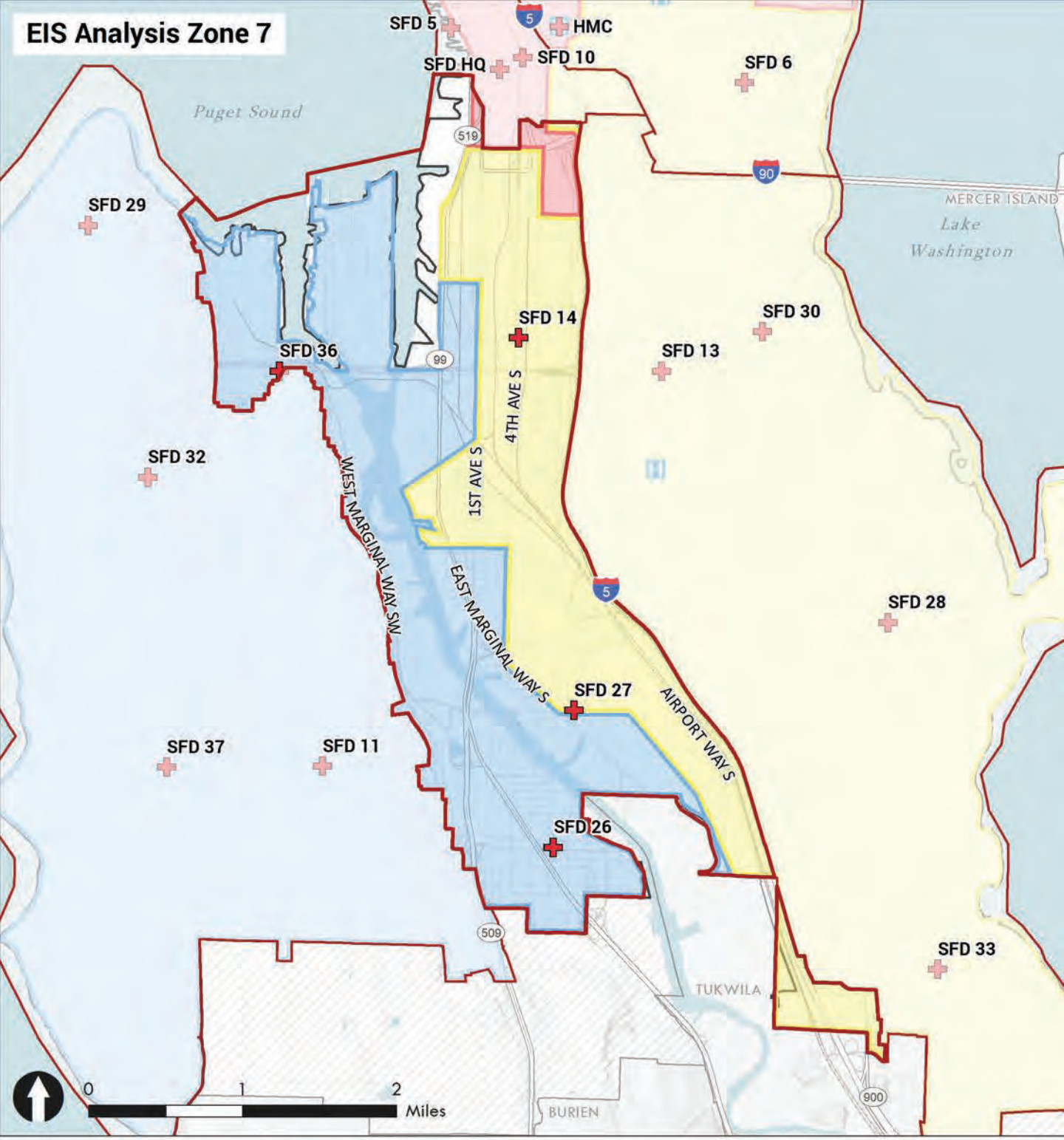
City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Fire Station
Hospital

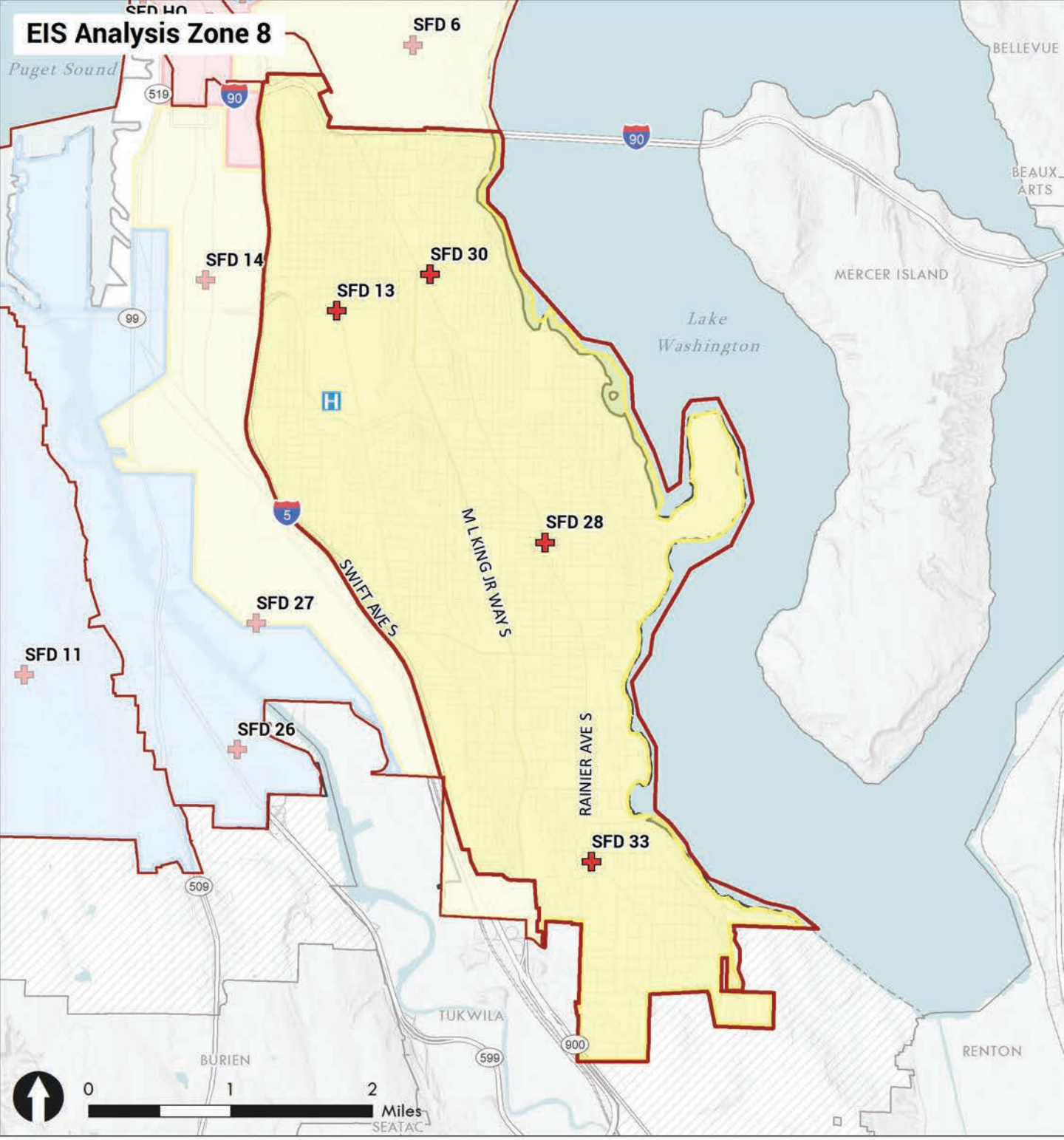
Fire Battalions

Battalion 2
Battalion 4
Battalion 5
Battalion 6
Battalion 7



Map Date: February 2023


EIS Analysis Zone 7
SFD 5
HMC
SFD HQ
SFD 10
SFD 6
Puget Sound
519
90
MERCER ISLAND
Lake Washington
SFD 29
SFD 14
SFD 30
SFD 36
99
SFD 13
4TH AVE S
SFD 32
1ST AVE S
WEST MARGINAL WAY SW
EAST MARGINAL WAY S
5
SFD 28
SFD 27
AIRPORT WAY S
SFD 37
SFD 11
SFD 26
509
SFD 33
TUKWILA
900
BURIEN
0
1
2
Miles
City of Seattle
Urban Growth Areas
Other Cities
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Fire Station
Hospital
Fire Battalions
Battalion 2
Battalion 4
Battalion 5
Battalion 6
Battalion 7
Map Date: February 2023



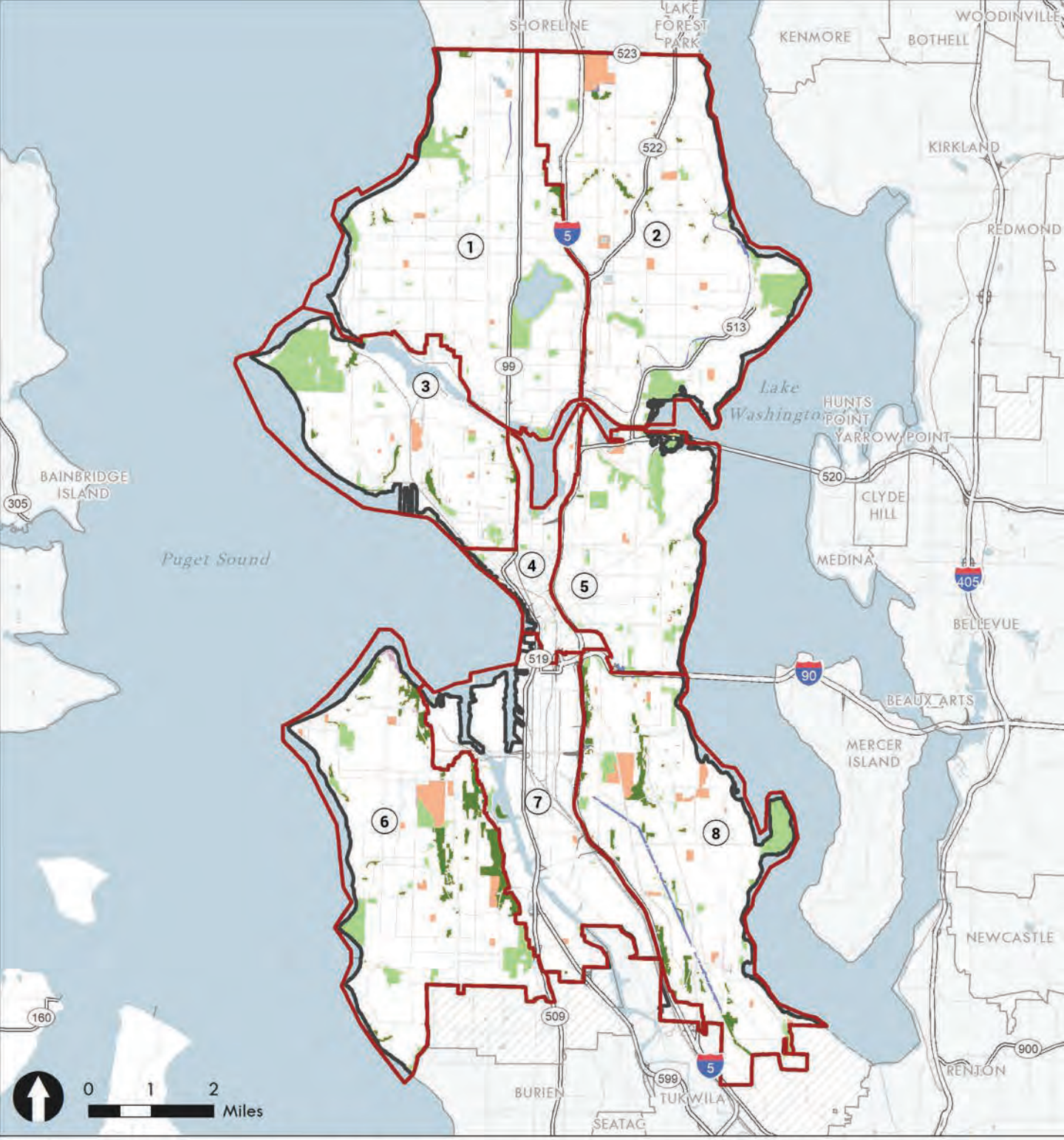
City of Seattle
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Fire Station
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Fire Battalions

Battalion 2
Battalion 4
Battalion 5
Battalion 6
Battalion 7



Map Date: February 2023



City of Seattle

Urban Growth Areas

Other Cities

Analysis Zones

Public Parks and Open Space

Parks

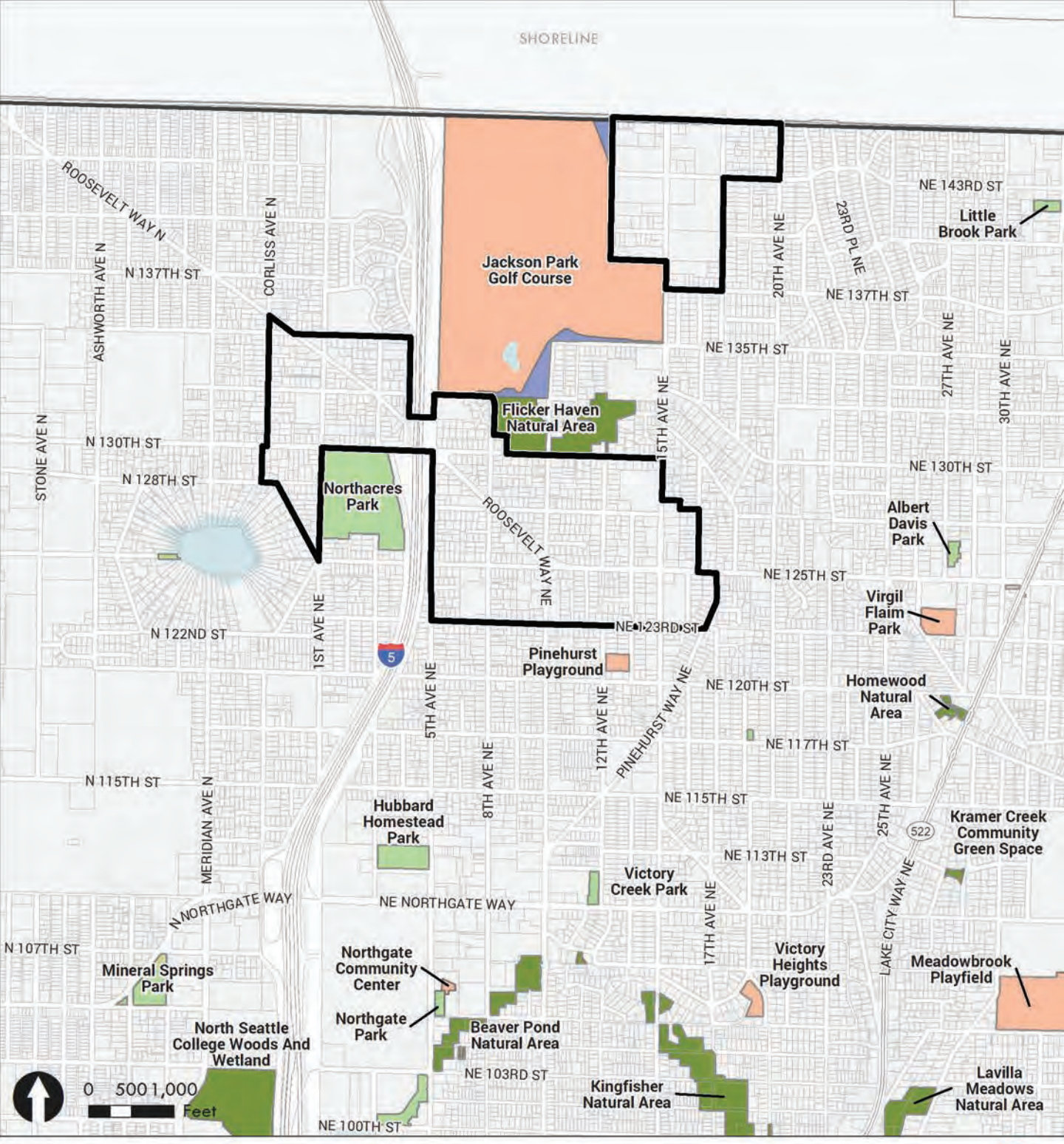
Playfields and Golf Courses

Greenbelts

Trails

Viewpoints

Map Date: March 2023

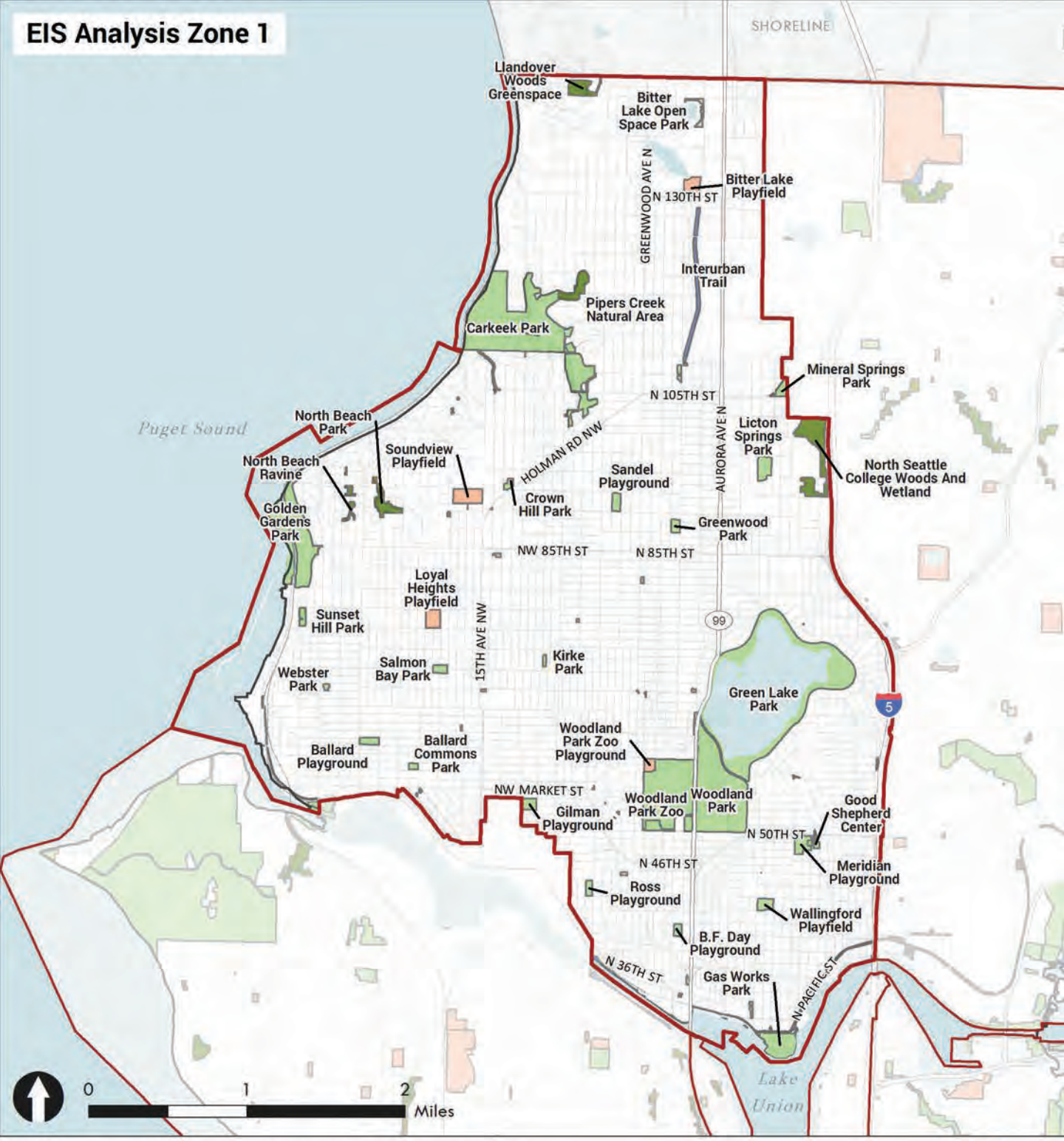


- City of Seattle
- Urban Growth Areas
- Other Cities
- 130th/145th Station Areas

Public Parks and Open Space

- Parks
- Playfields and Golf Courses
- Greenbelts
- Trails
- Viewpoints

Map Date: March 2023


EIS Analysis Zone 1
SHORELINE
Llandover Woods Greenspace
Bitter Lake Open Space Park
Bitter Lake Playfield
N 130TH ST
GREENWOOD AVE N
Interurban Trail
Pipers Creek Natural Area
Carkeek Park
Mineral Springs Park
N 105TH ST
Puget Sound
North Beach Park
North Beach Ravine
Soundview Playfield
HOLMAN RD NW
Crown Hill Park
Sandel Playground
AURORA AVE N
Licton Springs Park
North Seattle College Woods And Wetland
Golden Gardens Park
Greenwood Park
NW 85TH ST
N 85TH ST
Loyal Heights Playfield
Sunset Hill Park
15TH AVE NW
99
Webster Park
Salmon Bay Park
Kirke Park
Green Lake Park
5
Ballard Playground
Ballard Commons Park
Woodland Park Zoo Playground
NW MARKET ST
Gilman Playground
Woodland Park Zoo
Woodland Park
Good Shepherd Center
N 50TH ST
N 46TH ST
Meridian Playground
Ross Playground
Wallingford Playfield
B.F. Day Playground
N 36TH ST
Gas Works Park
N PACIFIC ST
Lake Union
0
1
2
Miles
City of Seattle
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EIS Analysis Zone 2



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Public Parks and Open Space

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City of Seattle

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Playfields and Golf Courses

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Map Date: March 2023



City of Seattle

Urban Growth Areas

Other Cities

Analysis Zones

Public Parks and Open Space

Parks

Playfields and Golf Courses

Greenbelts

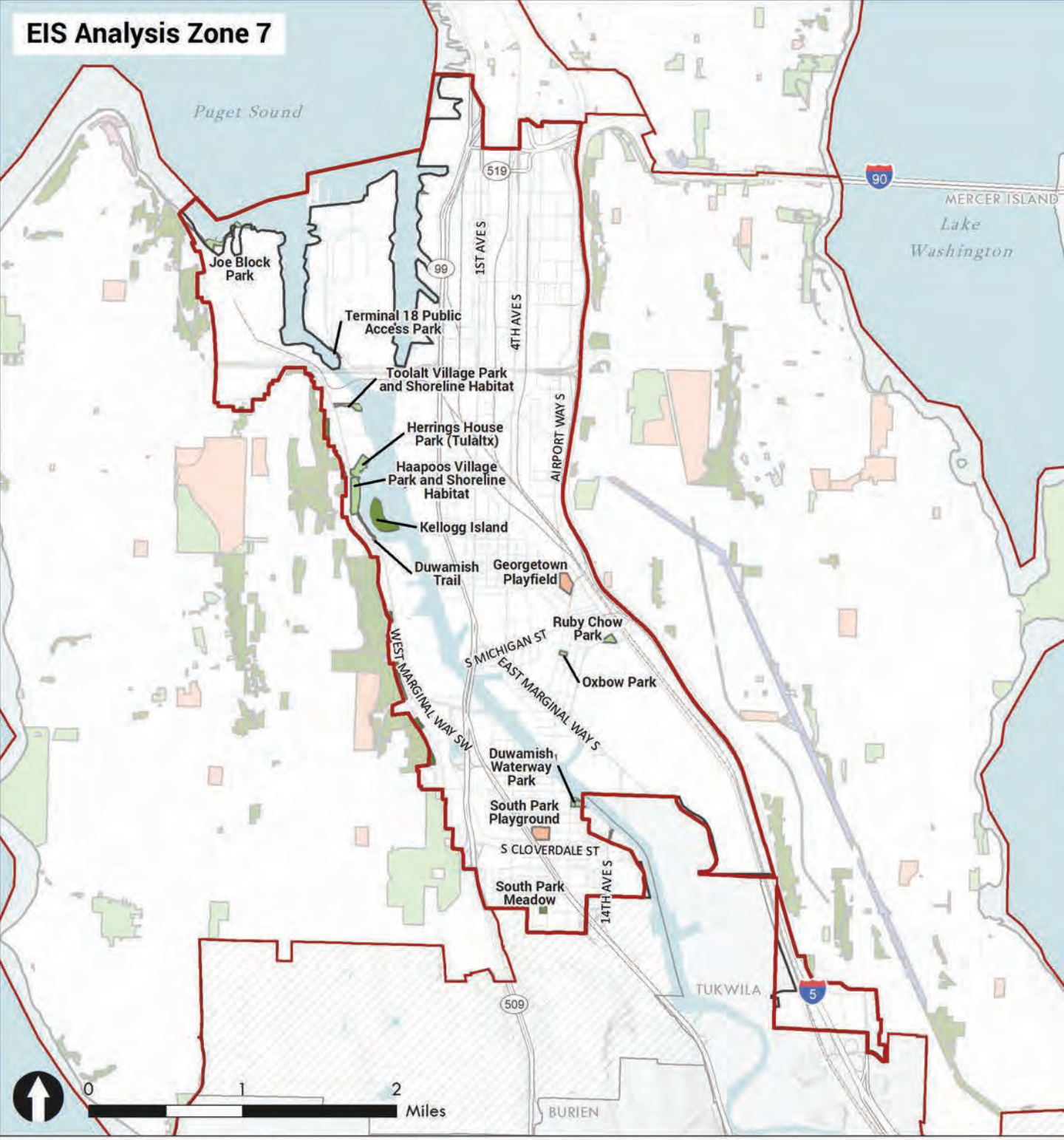
Trails

Viewpoints

Map Date: March 2023


EIS Analysis Zone 5
West Montlake Park
East Montlake Park
Roanoke Park
Lake Union
Montlake Playfield
Madison Park North Beach
I-5 Colonnade
Boren Park
Interlaken Park
Washington Park And Arboretum
Madison Park
St Marks Greenbelt
Volunteer Park
24TH AVE E
Bellevue Place
Washington Park
Lake Washington
Pendleton Miller Playfield
23RD AVE E
Lakeview Park
Harrison Ridge Greenbelt
E OLIVE WAY
Homer Harris Park
Viretta Park
Cal Anderson Park
E MADISON ST
Howell Park
Alvin Larkins Park
Plymouth Pillars Park
Madrona Ravine
Freeway Park
Madrona Playground
Madrona Park
MADISON ST
23RD AVE
7TH AVE
BOREN AVE
Leschi-Lake Dell Natural Area
Spruce Street Mini Park
Powell Barnett Park
North Leschi Moorage
Pratt Park
Flo Ware Park
Yesler Terrace Park
10th Ave Hillclimb
Frink Park
Leschi Park And South Moorage
Puget Sound
Dr. Blanche Lavizzo Park
23RD AVE S
Leschi/Frink Park
Judkins Park and Playfield
East Portal Viewpoint
Judge Charles M. Stokes Overlook
South Day Street Park
0
1
2
Miles
MERCER ISLAND
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EIS Analysis Zone 6
Hamilton Viewpoint Park
Duwamish Head Greenbelt
Don Armeni Park
Alki Beach Park
Seacrest Park
Alki Playground
College Street Ravine
Fairmount Park
Duwamish Head Greenbelt
Bar-S Playground
Schmitz Preserve Park
Hiawatha Playfield
Delridge Playfield
Me-Kwa-Mooks Natural Area
West Seattle Stadium
Pigeon Point
Me-Kwa-Mooks Park
Rotary Viewpoint
West Seattle Golf Course
Camp Long
Fairmount Playground
Puget Sound
Longfellow Creek Greenspace
Puget Creek Greenspace
West Duwamish Greenbelt
High Point Pond Park
Eddy Street Ravine
Walt Hundley Playfield
SYLVAN WAY SW
Lowman Beach Park
Orchard Street Ravine
Riverview Playfield
Solstice Park
SW HOLDEN ST
Lincoln Park
E.C. Hughes Playground
Highland Park Playground
35TH AVE SW
DELRIDGE WAY SW
Westcrest Park
Fauntleroy Park
Roxhill Park
SW ROXBURY ST
OLSON PL SW
MYERS WAY S
99
TUKWILA
509
Arroyos Natural Area
Seola Park
BURIEN
0
1
2
Miles
City of Seattle
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EIS Analysis Zone 7
Puget Sound
Lake Washington
MERCER ISLAND
519
90
99
1ST AVE S
4TH AVE S
AIRPORT WAY S
Joe Block Park
Terminal 18 Public Access Park
Toolalt Village Park and Shoreline Habitat
Herrings House Park (Tulaltx)
Haapoos Village Park and Shoreline Habitat
Kellogg Island
Duwamish Trail
Georgetown Playfield
Ruby Chow Park
S MICHIGAN ST
EAST MARGINAL WAY S
Oxbow Park
WEST MARGINAL WAY SW
Duwamish Waterway Park
South Park Playground
S CLOVERDALE ST
14TH AVE S
South Park Meadow
TUKWILA
5
509
BURIEN
0
1
2
Miles
City of Seattle
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Greenbelts
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Map Date: March 2023



City of Seattle

Urban Growth Areas

Other Cities

Analysis Zones

Public Parks and Open Space

Parks

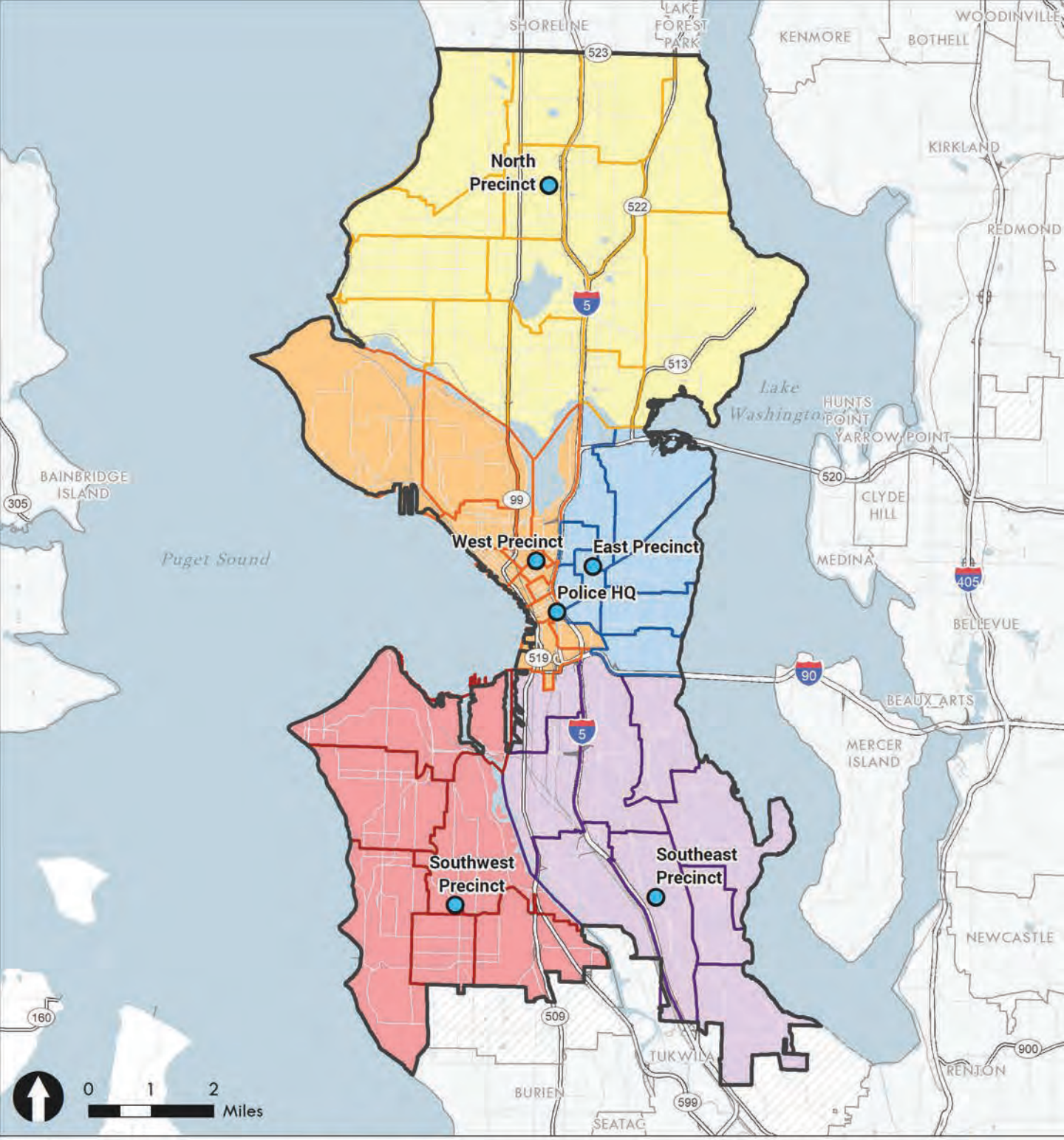
Playfields and Golf Courses

Greenbelts

Trails

Viewpoints

Map Date: March 2023



City of Seattle

Urban Growth Areas

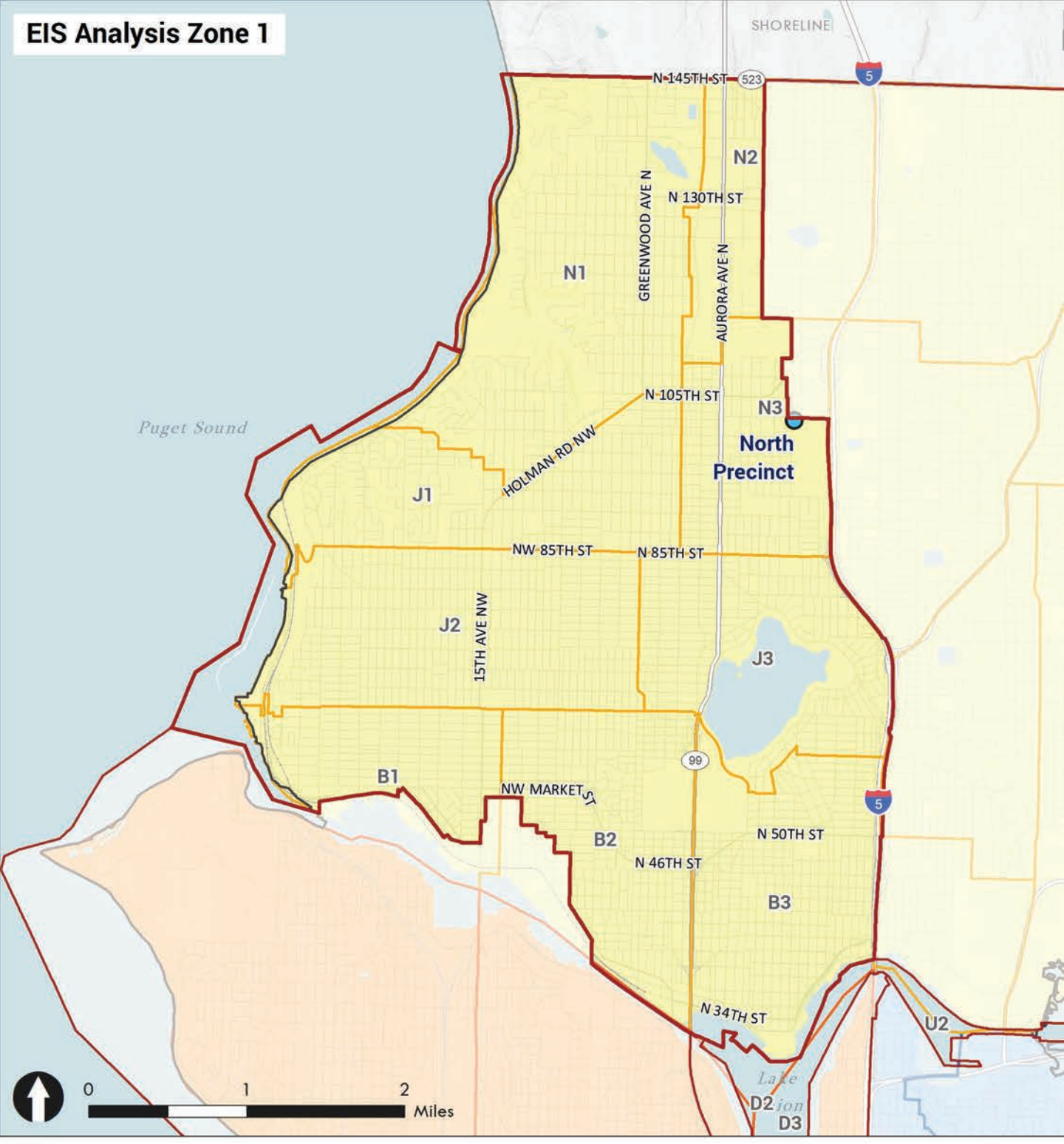
Other Cities

Police Stations

Seattle Police Patrol Areas

- North Precinct
- East Precinct
- West Precinct
- South Precinct
- Southwest Precinct

Map Date: March 2023

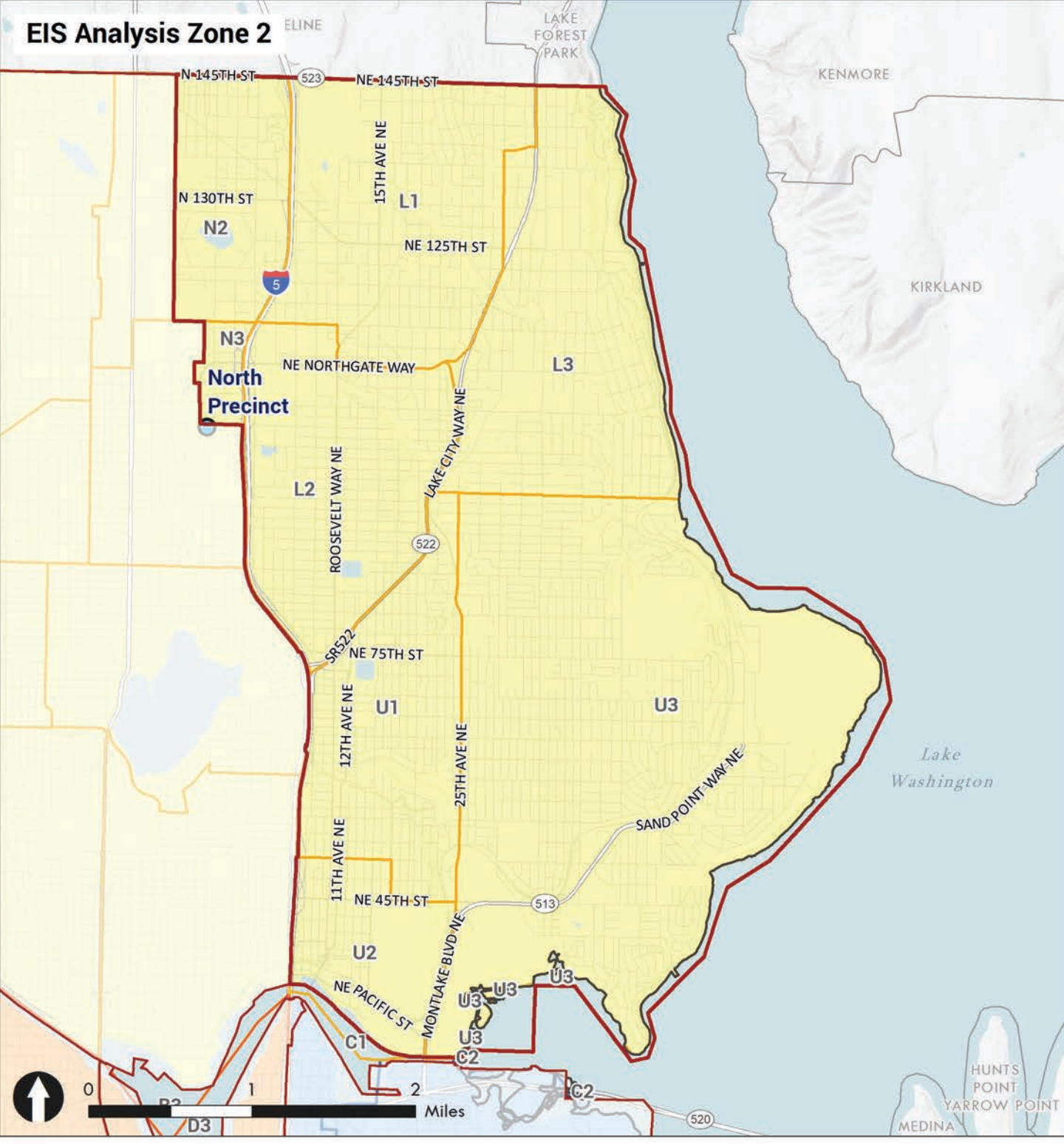


City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Police Stations

Seattle Police Patrol Areas

North Precinct
East Precinct
West Precinct
South Precinct
Southwest Precinct

Map Date: March 2023

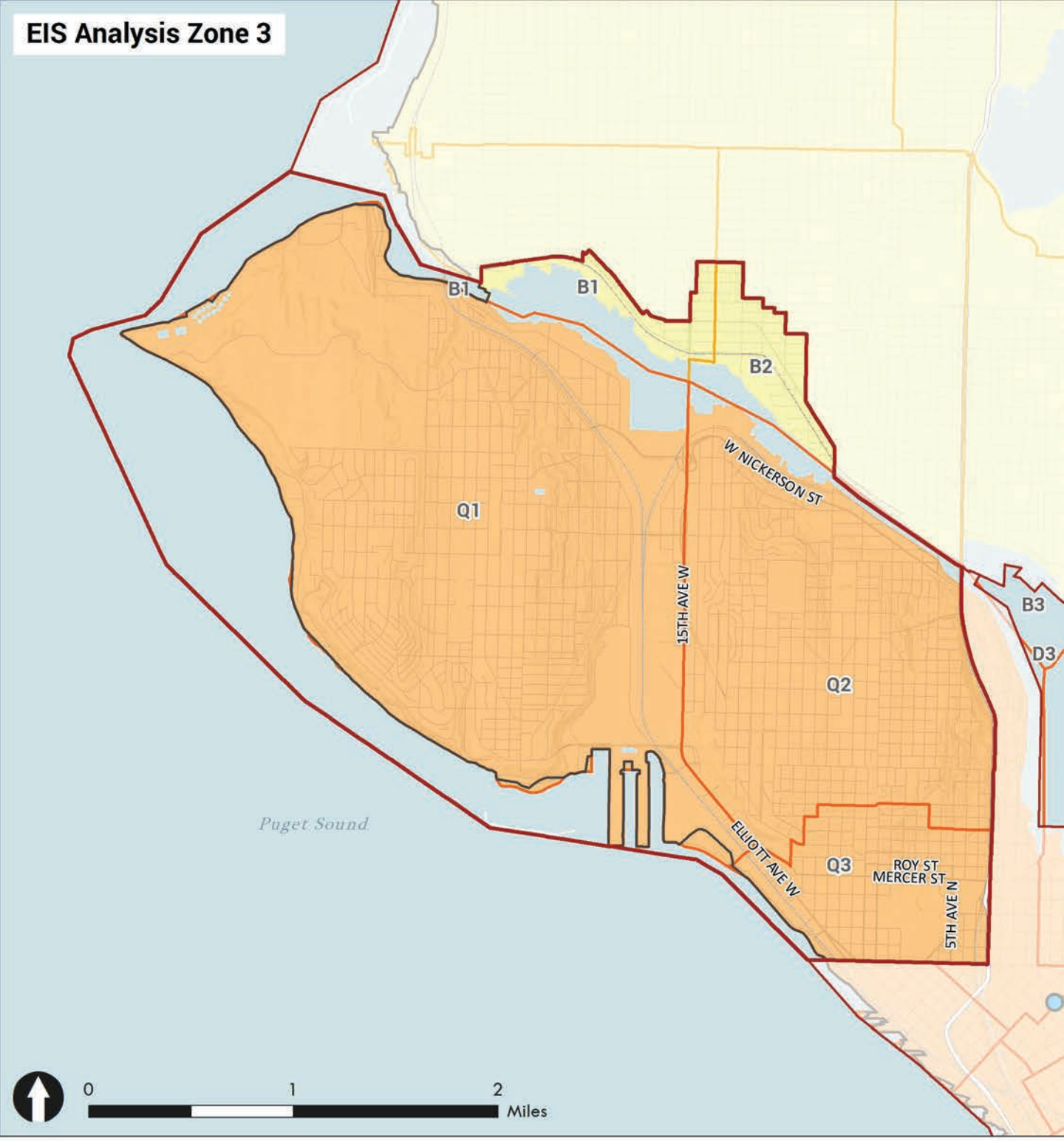


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Seattle Police Patrol Areas

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City of Seattle

Urban Growth Areas

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Seattle Police Patrol Areas

North Precinct

East Precinct

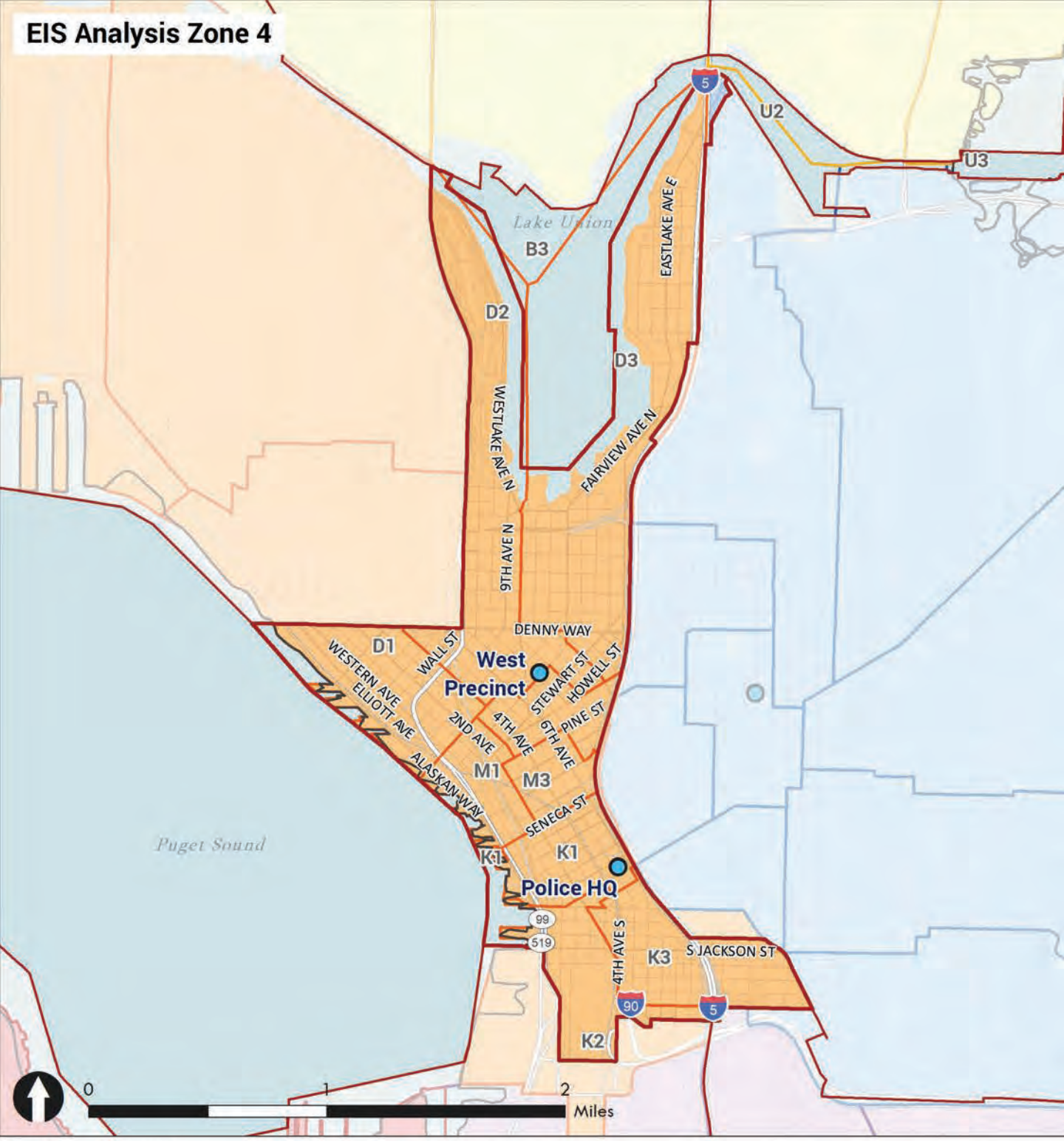
West Precinct

South Precinct

Southwest Precinct



Map Date: March 2023



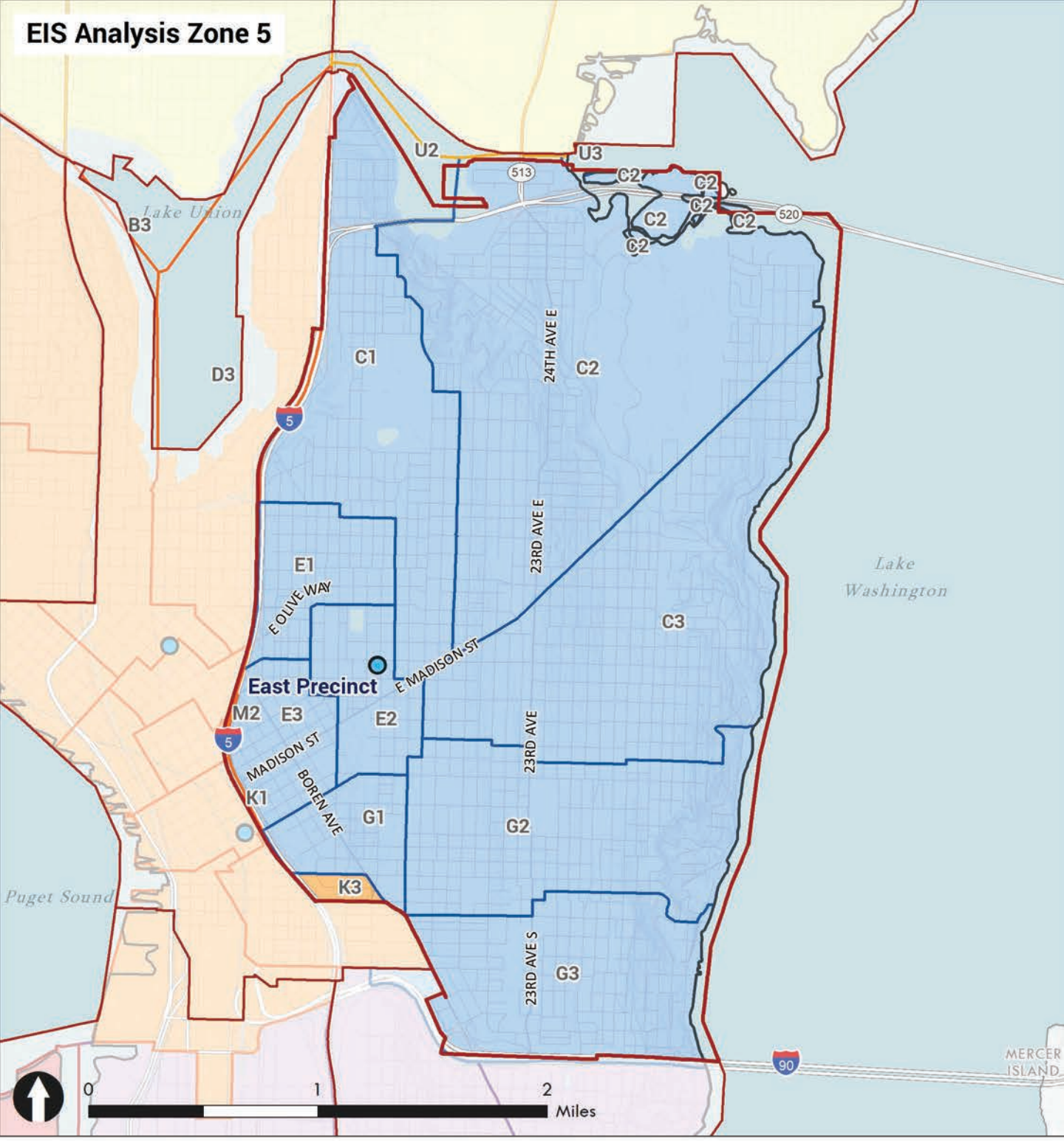
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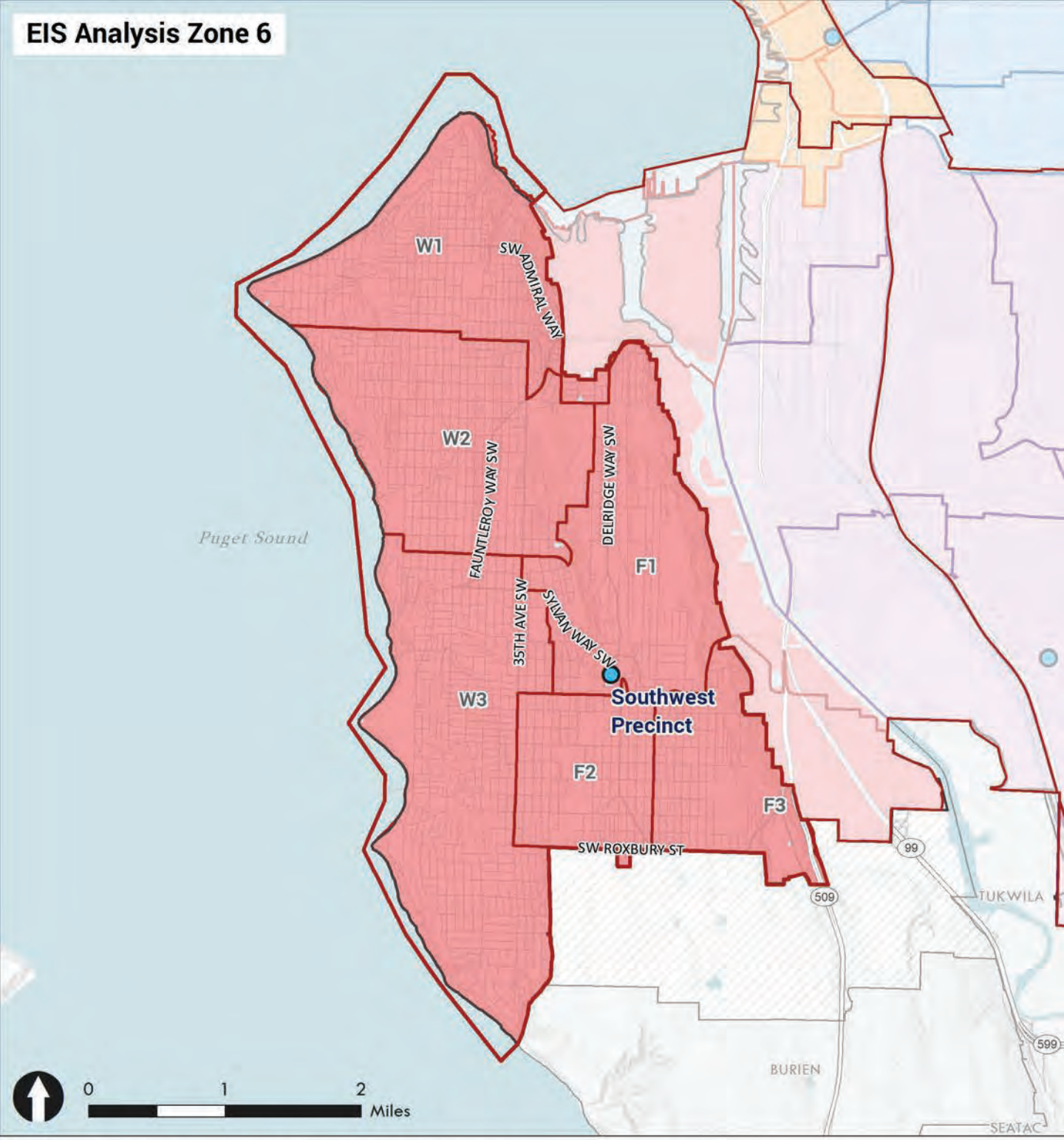
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Urban Growth Areas
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Police Stations

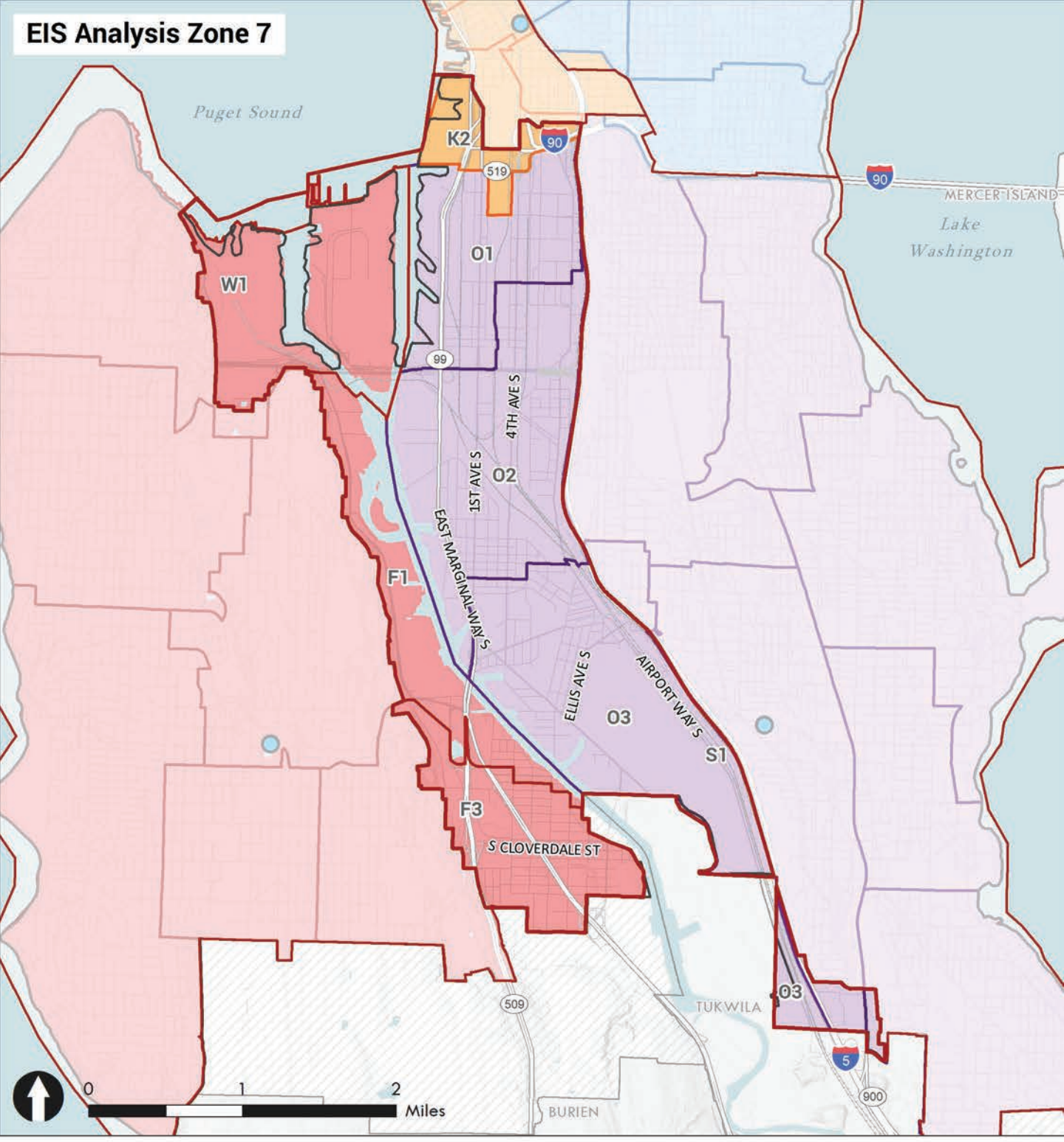
Seattle Police Patrol Areas

North Precinct
East Precinct
West Precinct
South Precinct
Southwest Precinct



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EIS Analysis Zone 6
W1
SW ADMIRAL WAY
W2
FAUNTLEROY WAY SW
DELRIDGE WAY SW
Puget Sound
F1
35TH AVE SW
SYLVAN WAY SW
W3
Southwest Precinct
F2
F3
SW ROXBURY ST
99
509
TUKWILA
599
BURIEN
SEATAC
0
1
2
Miles
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



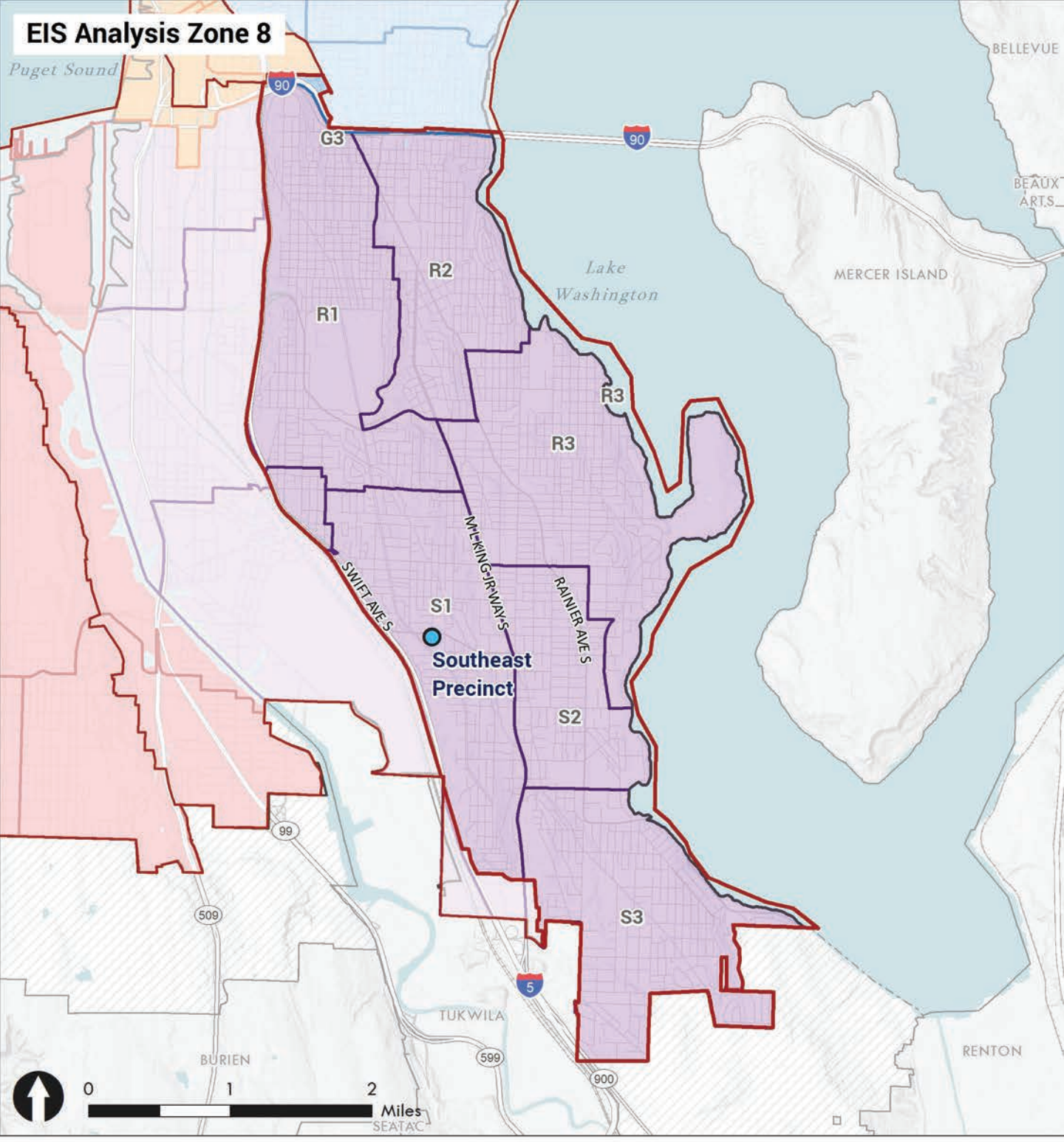
- City of Seattle
- Urban Growth Areas
- Other Cities
- Analysis Zones
- Police Stations

Seattle Police Patrol Areas

- North Precinct
- East Precinct
- West Precinct
- South Precinct
- Southwest Precinct



Map Date: March 2023

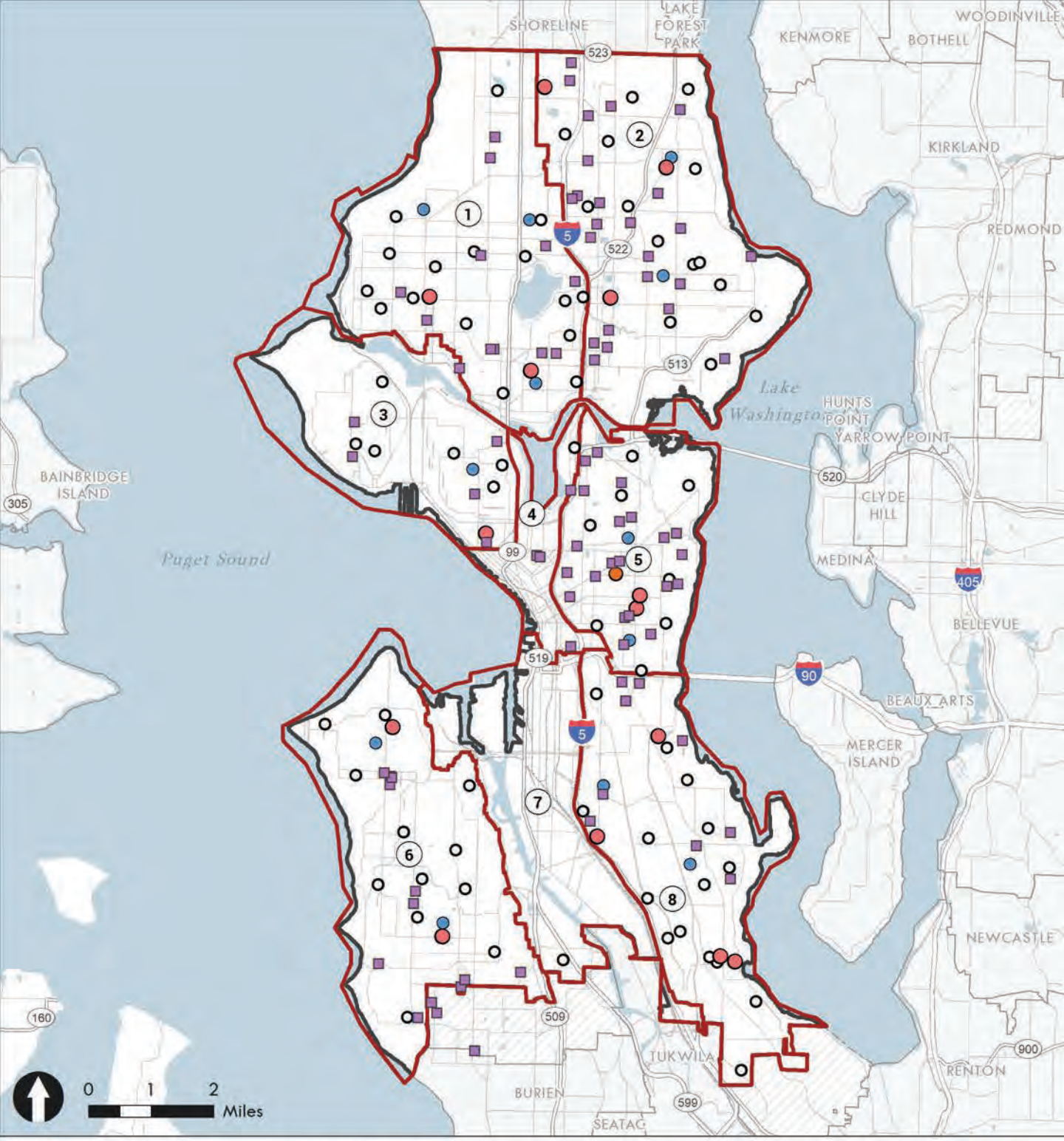


City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Police Stations

Seattle Police Patrol Areas

North Precinct
East Precinct
West Precinct
South Precinct
Southwest Precinct

Map Date: March 2023



City of Seattle

Urban Growth Areas

Other Cities

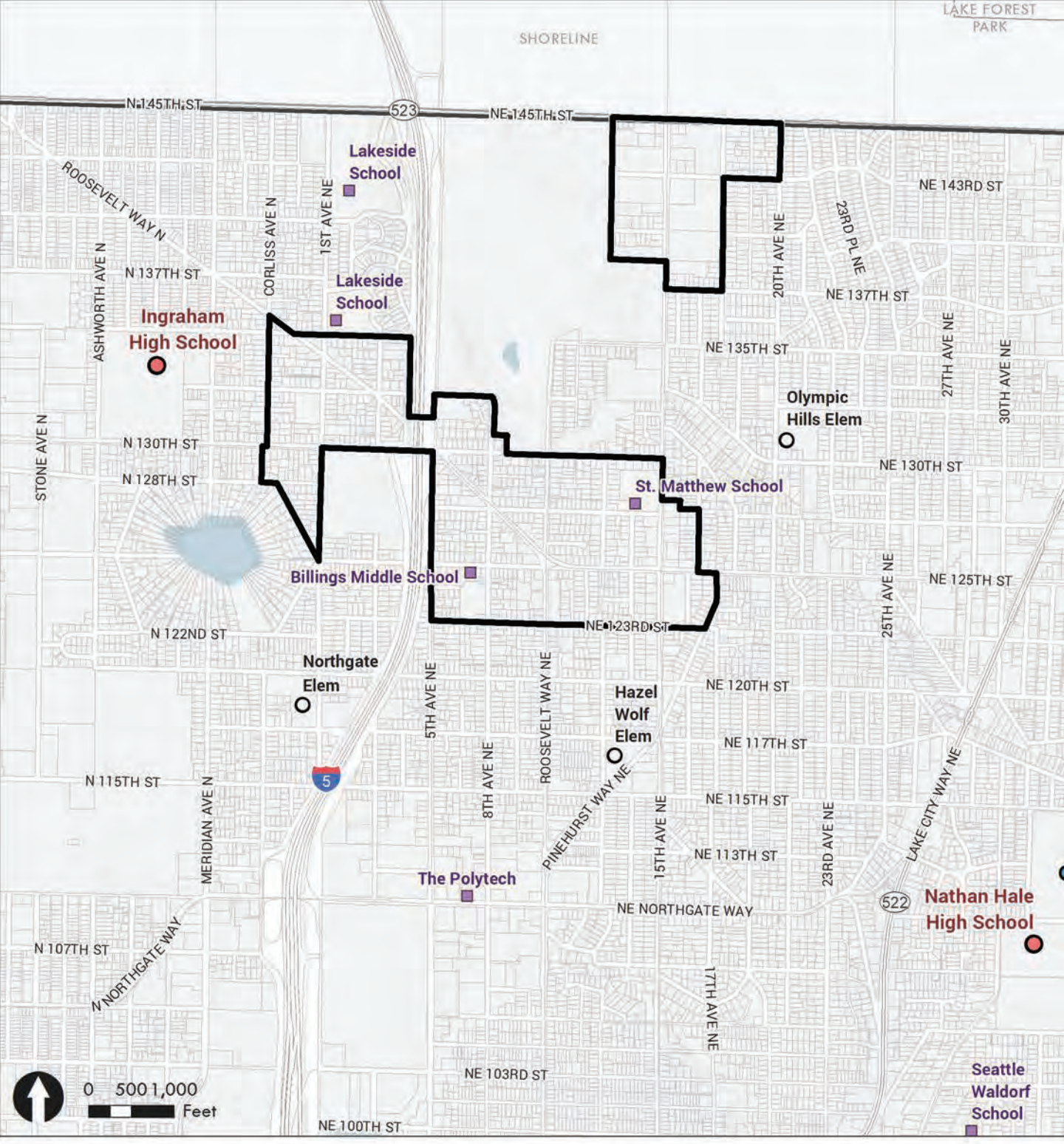
Analysis Zones

Seattle Public Schools

- Elementary School
- Middle School
- Middle/High School
- High School

Private School

Map Date: March 2023



City of Seattle

Urban Growth Areas

Other Cities

130th/145th Station Areas

Seattle Public Schools

Elementary School

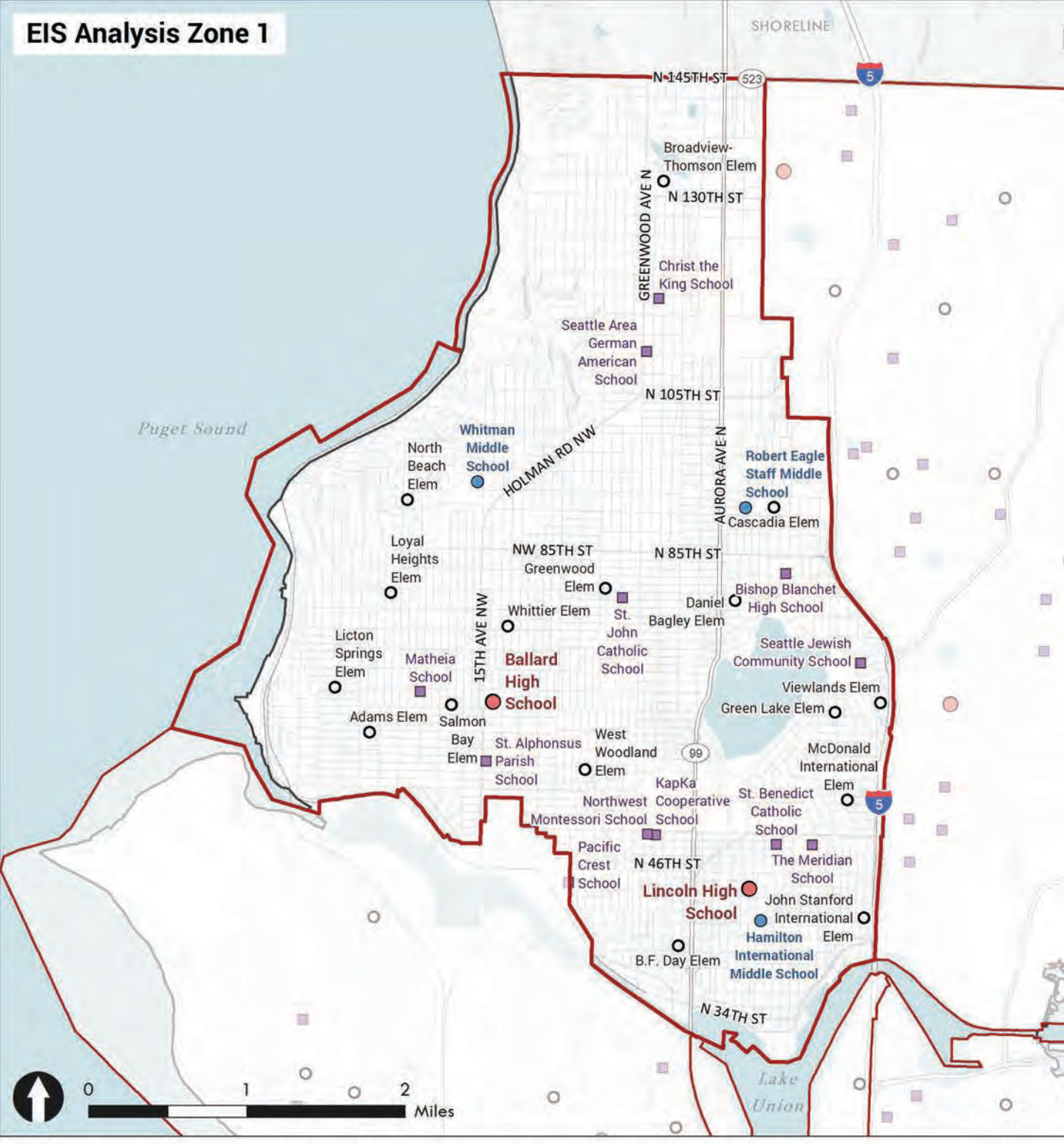
Middle School

Middle/High School

High School

Private School

Map Date: March 2023



City of Seattle

Urban Growth Areas

Other Cities

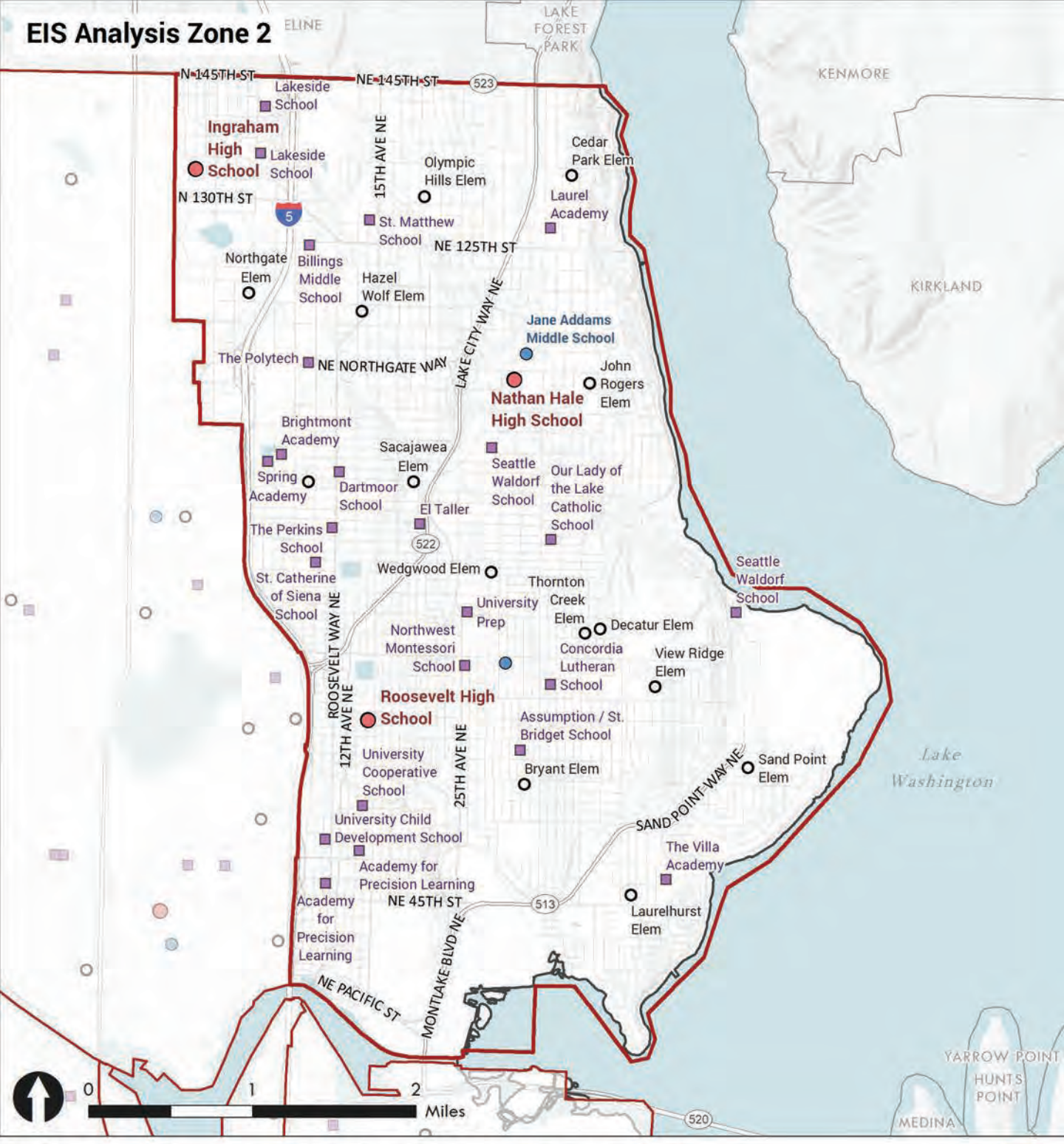
Analysis Zones

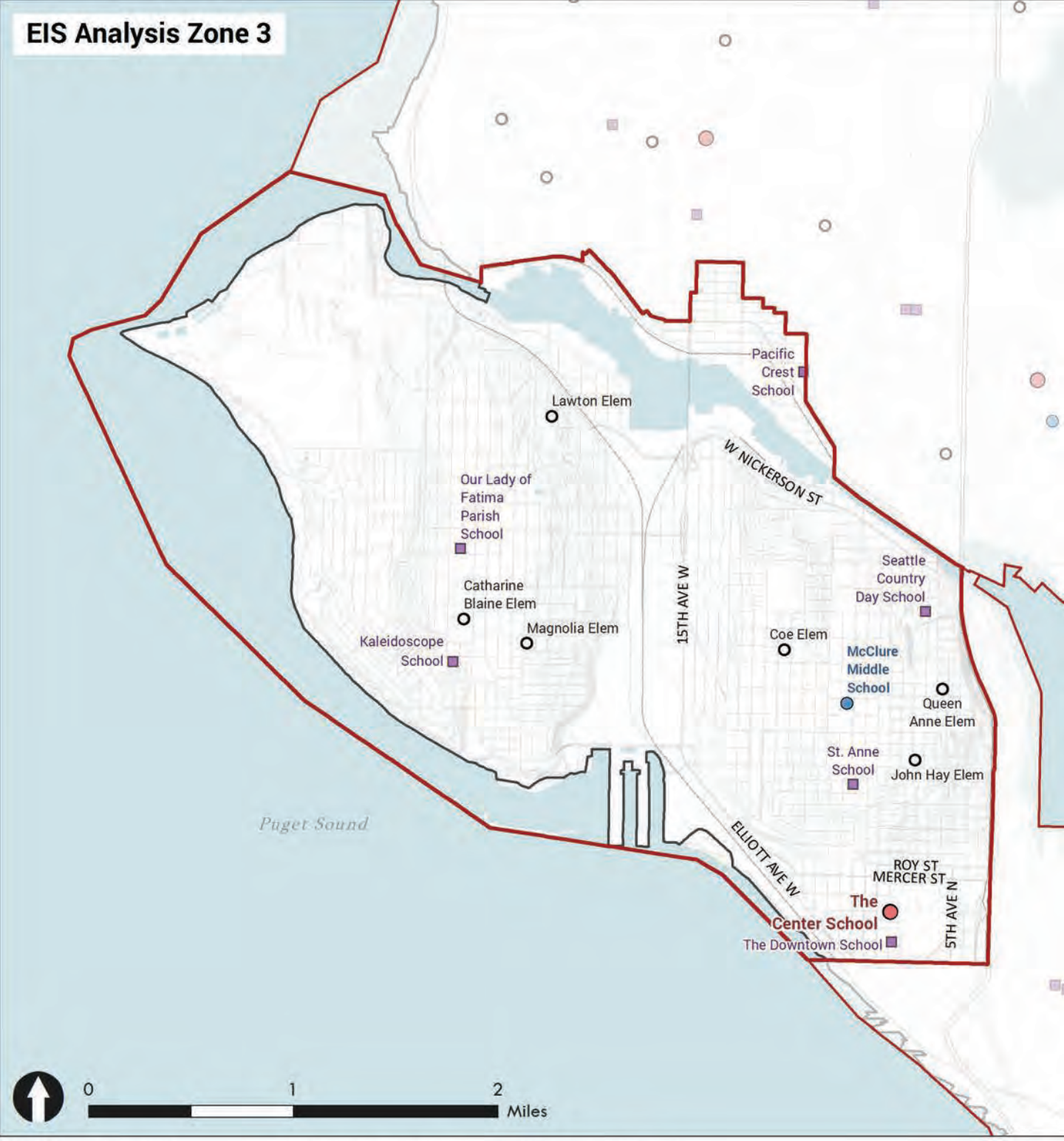
Seattle Public Schools

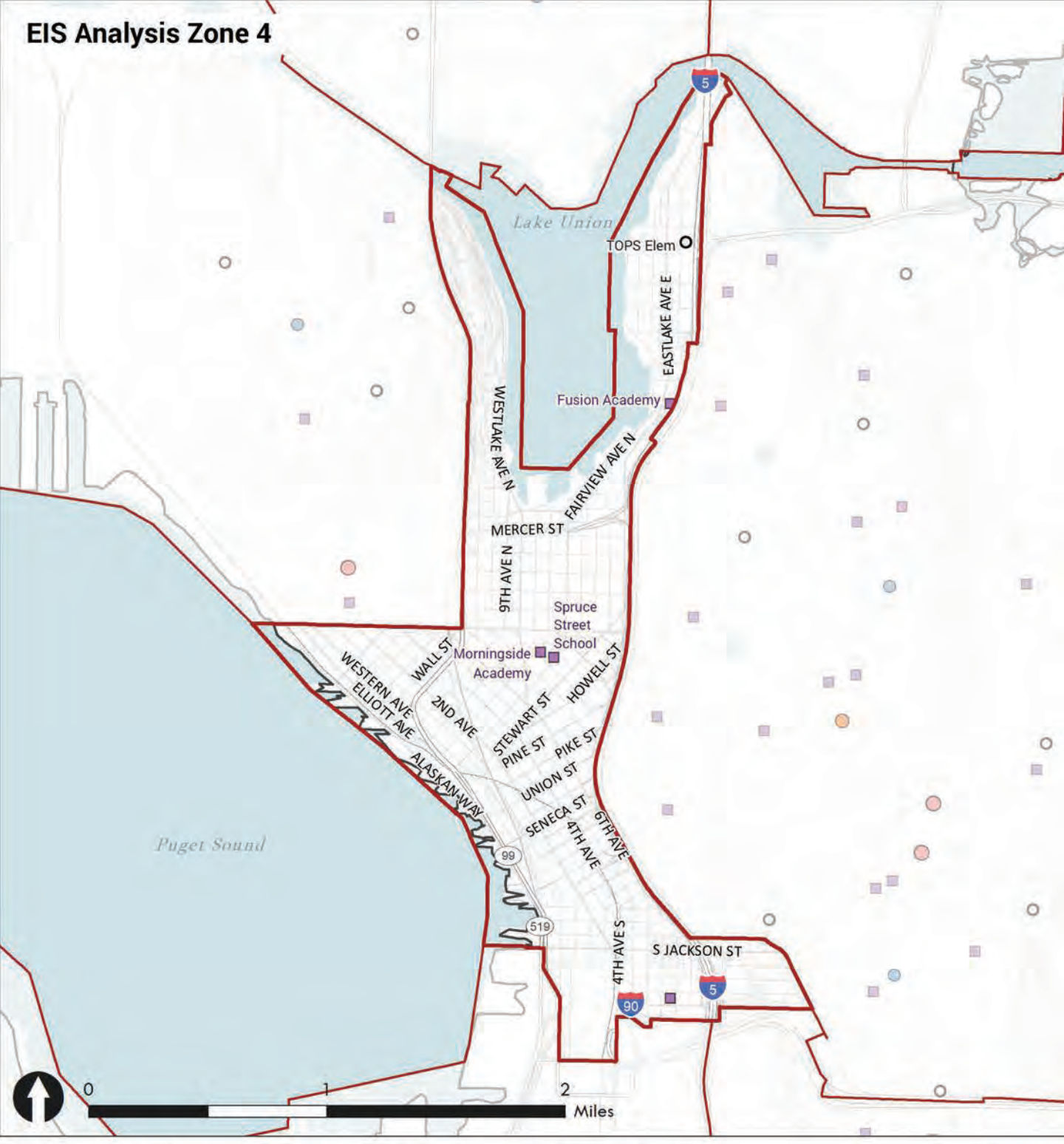
- Elementary School
- Middle School
- Middle/High School
- High School

Private School

Map Date: March 2023


EIS Analysis Zone 2
ELINE
LAKE FOREST PARK
KENMORE
KIRKLAND
N 145TH ST
NE 145TH ST
523
Lakeside School
Ingraham High School
Lakeside School
15TH AVE NE
Olympic Hills Elem
Cedar Park Elem
Laurel Academy
N 130TH ST
5
St. Matthew School
NE 125TH ST
Northgate Elem
Billings Middle School
Hazel Wolf Elem
LAKE CITY WAY NE
Jane Addams Middle School
The Polytech
NE NORTHGATE WAY
John Rogers Elem
Nathan Hale High School
Brightmont Academy
Spring Academy
Sacajawea Elem
Dartmoor School
Seattle Waldorf School
Our Lady of the Lake Catholic School
El Taller
The Perkins School
522
Wedgwood Elem
St. Catherine of Siena School
Thornton Creek Elem
University Prep
Seattle Waldorf School
Decatur Elem
Northwest Montessori School
Concordia Lutheran School
View Ridge Elem
ROOSEVELT WAY NE
12TH AVE NE
Roosevelt High School
Assumption / St. Bridget School
25TH AVE NE
University Cooperative School
Bryant Elem
Sand Point Elem
SAND POINT WAY NE
Lake Washington
University Child Development School
The Villa Academy
Academy for Precision Learning
NE 45TH ST
513
Academy for Precision Learning
Laurelhurst Elem
MONTLAKE BLVD NE
NE PACIFIC ST
YARROW POINT
HUNTS POINT
MEDINA
520
0
1
2
Miles
City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Seattle Public Schools
Elementary School
Middle School
Middle/High School
High School
Private School
Map Date: March 2023


EIS Analysis Zone 3
Pacific Crest School
Lawton Elem
W NICKERSON ST
Our Lady of Fatima Parish School
Seattle Country Day School
Catharine Blaine Elem
15TH AVE W
Magnolia Elem
Kaleidoscope School
Coe Elem
McClure Middle School
Queen Anne Elem
St. Anne School
John Hay Elem
Puget Sound
ELLIOTT AVE W
ROY ST
MERCER ST
5TH AVE N
The Center School
The Downtown School
0
1
2
Miles
City of Seattle
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Seattle Public Schools
Elementary School
Middle School
Middle/High School
High School
Private School
Map Date: March 2023



City of Seattle

Urban Growth Areas

Other Cities

Analysis Zones

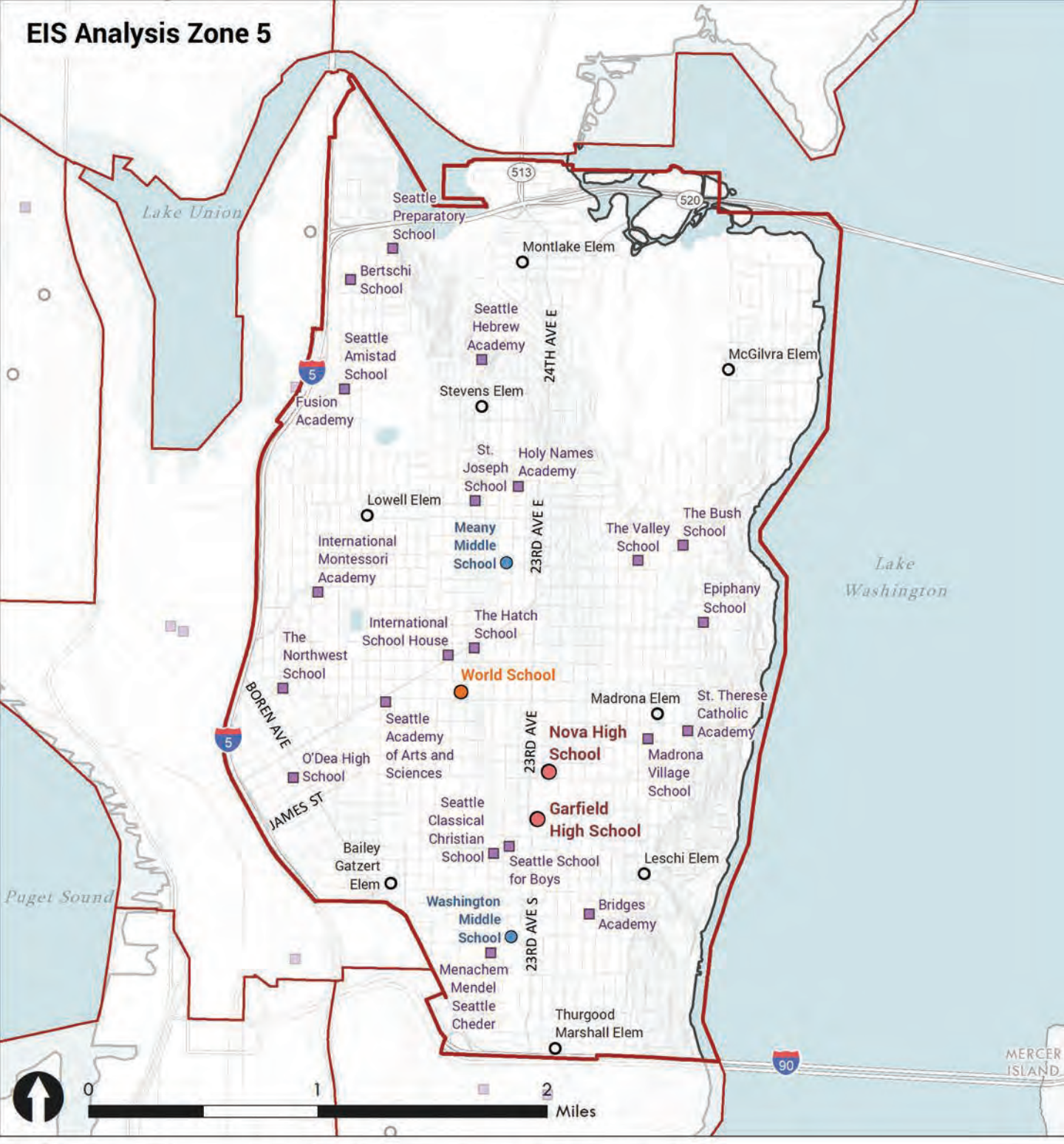
Seattle Public Schools

- Elementary School
- Middle School
- Middle/High School
- High School

Private School



Map Date: March 2023



City of Seattle

Urban Growth Areas

Other Cities

Analysis Zones

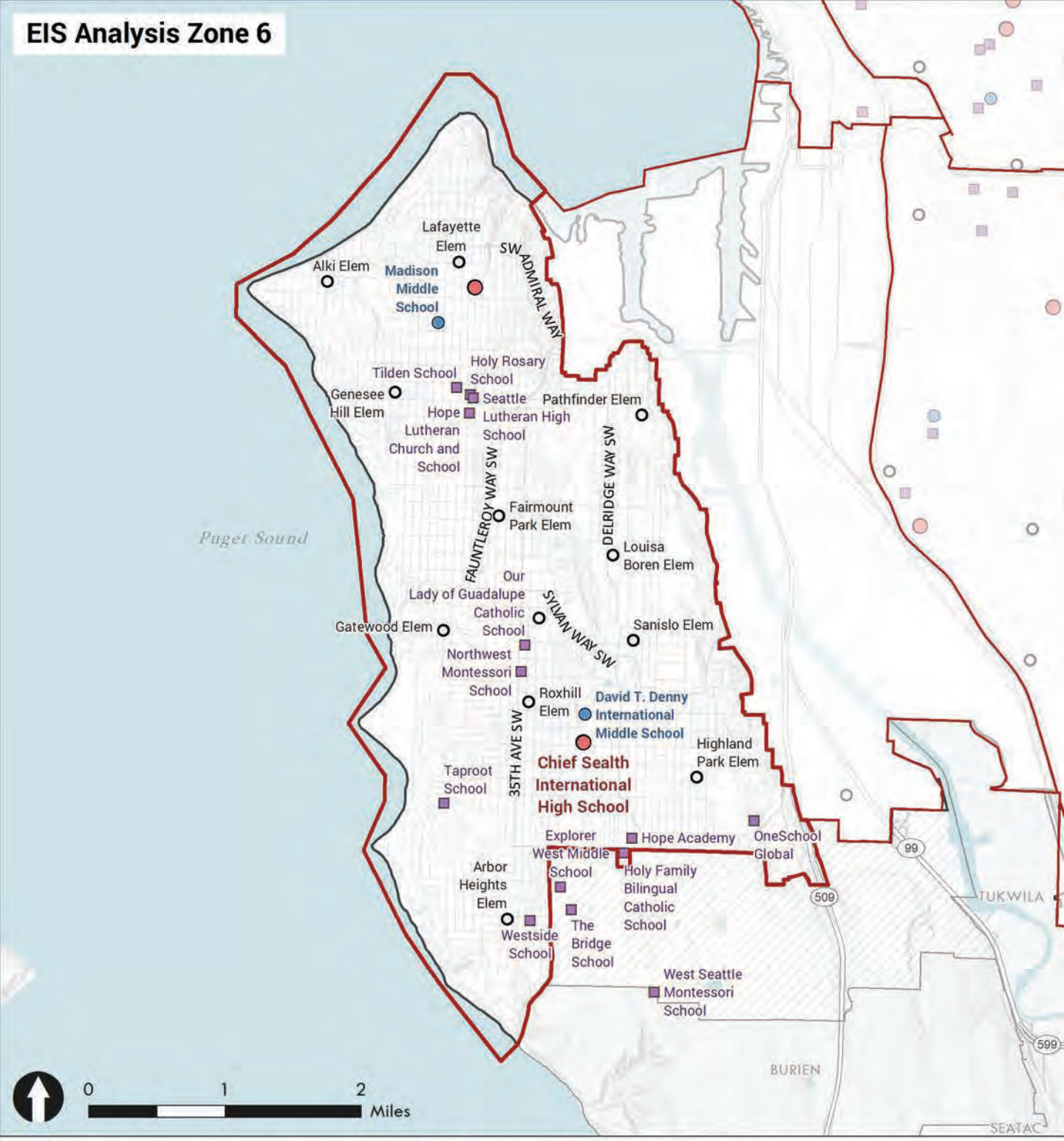
Seattle Public Schools

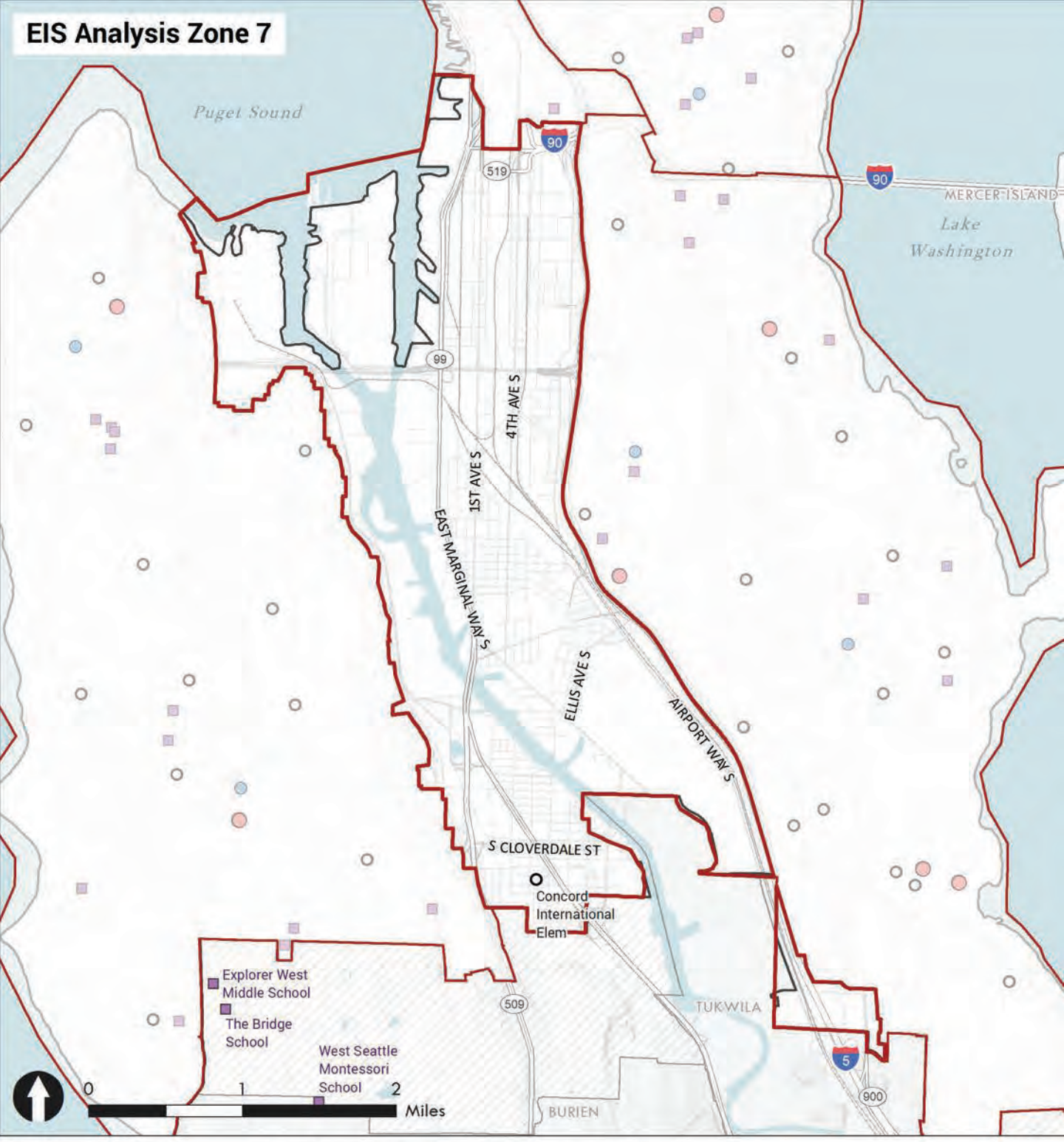
- Elementary School
- Middle School
- Middle/High School
- High School

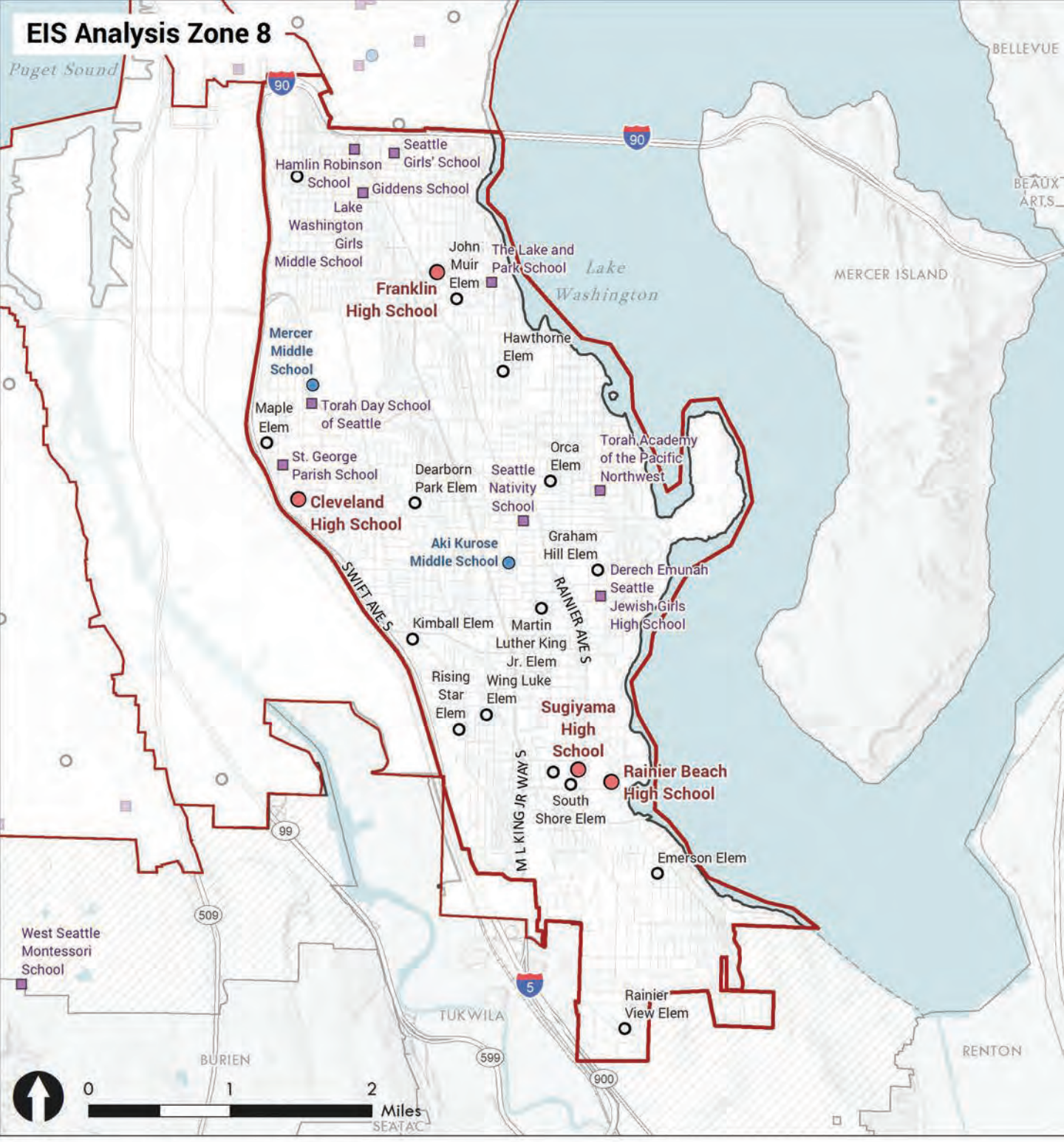
Private School



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EIS Analysis Zone 6
Lafayette Elem
Alki Elem
Madison Middle School
SW ADMIRAL WAY
Tilden School
Holy Rosary School
Genesee Hill Elem
Seattle Lutheran High School
Pathfinder Elem
Hope Lutheran Church and School
FAUNTLEROY WAY SW
DELRIDGE WAY SW
Fairmount Park Elem
Puget Sound
Louisa Boren Elem
Our Lady of Guadalupe Catholic School
SYLVAN WAY SW
Gatewood Elem
Sanislo Elem
Northwest Montessori School
Roxhill Elem
David T. Denny International Middle School
35TH AVE SW
Chief Sealth International High School
Highland Park Elem
Taproot School
Explorer West Middle School
Hope Academy
OneSchool Global
Arbor Heights Elem
Holy Family Bilingual Catholic School
Westside School
The Bridge School
West Seattle Montessori School
99
509
TUKWILA
599
BURIEN
SEATAC
0
1
2
Miles
City of Seattle
Urban Growth Areas
Other Cities
Analysis Zones
Seattle Public Schools
Elementary School
Middle School
Middle/High School
High School
Private School
Map Date: March 2023


EIS Analysis Zone 7
Puget Sound
Lake Washington
MERCER ISLAND
90
519
99
4TH AVE S
1ST AVE S
EAST MARGINAL WAY S
ELLIS AVE S
AIRPORT WAY S
S CLOVERDALE ST
Concord International Elem
Explorer West Middle School
The Bridge School
West Seattle Montessori School
509
TUKWILA
5
900
BURIEN
0
1
2
Miles
City of Seattle
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Other Cities
Analysis Zones
Seattle Public Schools
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Private School
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City of Seattle
Urban Growth Areas
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Seattle Public Schools

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- Middle School
- Middle/High School
- High School

Private School

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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	
Maximum density	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.
Floor area ratio (FAR)	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
Lot coverage	50 percent
Height limit	3 stories for market-rate development
	4 stories for development with income-restricted affordable homes
Minimum open space requirement	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.
Minimum setbacks and separations	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
Height	32 feet (3 stories)	40 feet (4 stories)	50 feet inside and outside centers (5 stories)
Floor area ratio (FAR)	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
Density	1 unit per 1,150 square feet of lot area except where state law requires higher density	none	none
Front setback	7 feet average, 5 feet minimum		
Rear setback	7 feet average, 5 feet minimum, 0 feet if there is an alley		
Side setback	5 feet		
Amenity area	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)
Height	65 feet (6 stories)	85 feet (7-8 stories)
Floor area ratio (FAR)	3.2	4.5
Density	none	none
Front setback	7 feet average, 5 feet minimum With exemption for projects with large courtyard	
Rear setback	10 feet **or** 0 feet **with** an alley	
Side setback	5 feet	
Amenity area	5 percent of the total floor area	
Likely outcomes	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, 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

<u>Changes to **Lowrise** zoning to meet state requirements and seek greater consistency with updated approach to NR zones</u>

- 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.

Table A for Section 1 **Standard Zoning Changes**	
Existing Zoning	**New Zoning**
RSL	LR1 (M)

Table A for Section 1 **Standard Zoning Changes**	
Existing Zoning	**New Zoning**
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 ((~~1~~))	NR((~~1~~))
((~~Residential, Neighborhood 2~~	~~NR2~~
~~Residential, Neighborhood 3~~	~~NR3~~
~~Residential, Neighborhood, Small Lot~~	~~RSL~~))
Residential, Multifamily, Lowrise 1	LR1
Residential, Multifamily, Lowrise 2	LR2

Zones	Abbreviated
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

Zones	Abbreviated
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.

Table A for 23.44.004 **Permitted and prohibited uses**	
Uses	**Permitted and prohibited uses**
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[1]
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[2]
D. Parks and open space	P
E. Ground-floor commercial uses	P[3]
F. Human service use	P
G. Cemeteries	P/X[4]
H. Community gardens	P
I. Rail transit facilities and railroads;	P
J. Park and ride facilities	CU[5]
K. Commercially operating horse farms in existence before July 1, 2000	P[6]
L. Uses not otherwise permitted if located in Landmark structures	CU[7]
M. Uses not otherwise permitted if located in structures unsuited to permitted uses	CU[8]
N. All other uses	X
Key to Table A for 23.44.004 P = Permitted outright CU = Permitted as an Administrative Conditional Use X = Prohibited	

Table A for 23.44.004 **Permitted and prohibited uses**	
Uses	**Permitted and prohibited uses**
Footnotes to Table A for 23.44.004 [1] Congregate housing is allowed within a quarter mile of a major transit stop and prohibited in other areas. [2] Pursuant to procedures established in Chapter 23.78 [3] Ground-floor commercial uses are only allowed if they meet the standards of subsection 23.44.006.E [4] Subject to subsection 23.44.004.D [5] Pursuant to standards in subsection 23.44.006.F [6] 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 [7] Pursuant to standards in subsection 23.44.006.D [8] 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 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.

Table A for 23.44.010 **Floor area ratio (FAR) in NR zones**	
Density	**Floor area ratio**
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

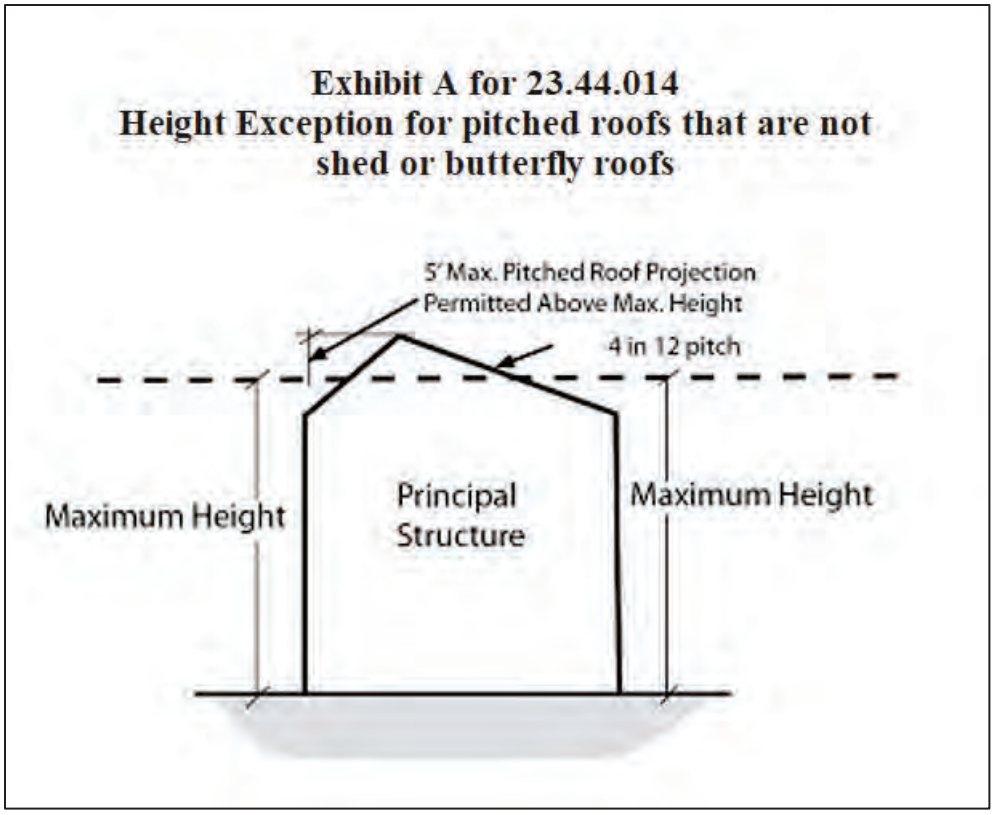
1. Subject to the exceptions allowed in this Section 23.44.014, the height limit for any structure in NR zones is 32 feet.

2. The height limit for accessory structures that are located in required setbacks or separations is 12 feet.

B. Standards for pitched roofs

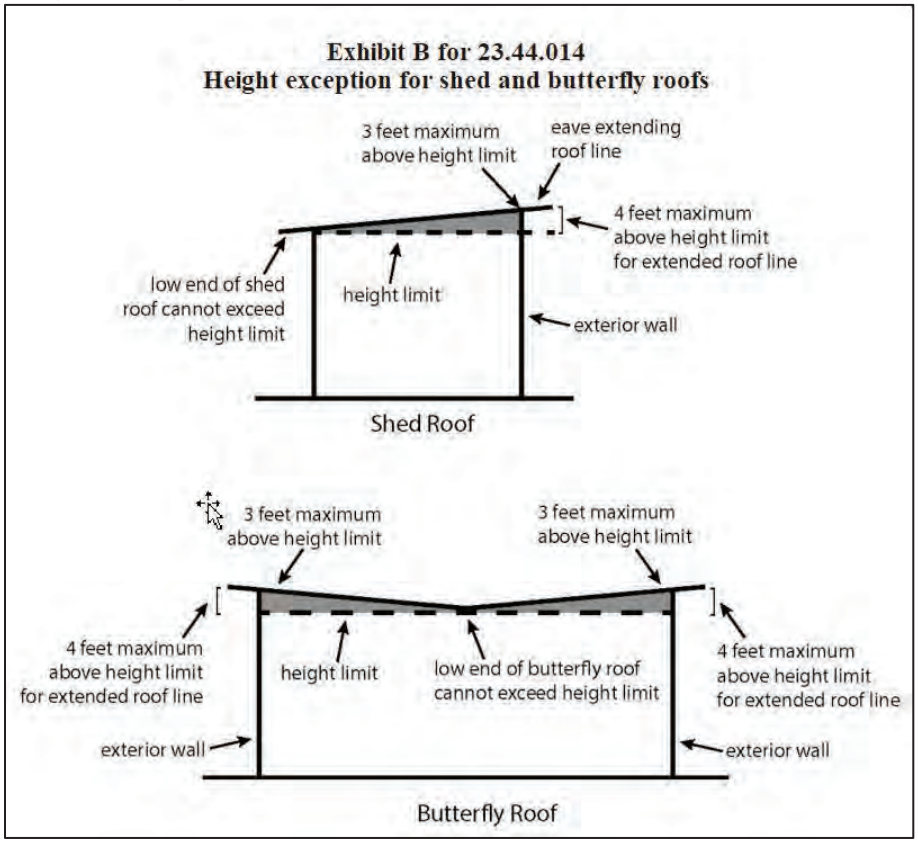
1. The ridge of a pitched roof that is not a shed or butterfly roof on a principal structure may extend up to 5 feet above the maximum height limit, as determined under subsection 23.44.014.A. All parts of the roof above the height limit must be pitched at a rate of not less than 4:12 (see Exhibit A for 23.44.014).

Exhibit A for 23.44.014
Height Exception for pitched roofs that are not shed or butterfly roofs



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.

Table A for 23.44.018 **Required setbacks in Neighborhood Residential zones**	
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:

a. Not located within 5 feet of a rear lot line that is not an alley lot line;

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.

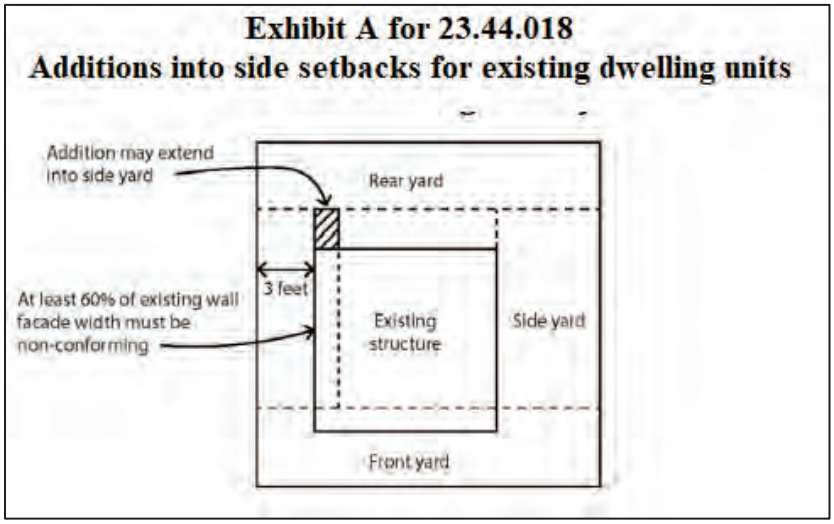
5. An addition to an existing dwelling unit may extend into a required side setback if:

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.

Table A for 23.44.024 **Number of tree points required**	
Density	**Tree points required per lot area [1]**
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: [1] 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.

Table B for 23.44.024 Tree points		
Type of tree	**Points for deciduous trees**	**Points for conifer trees**
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.

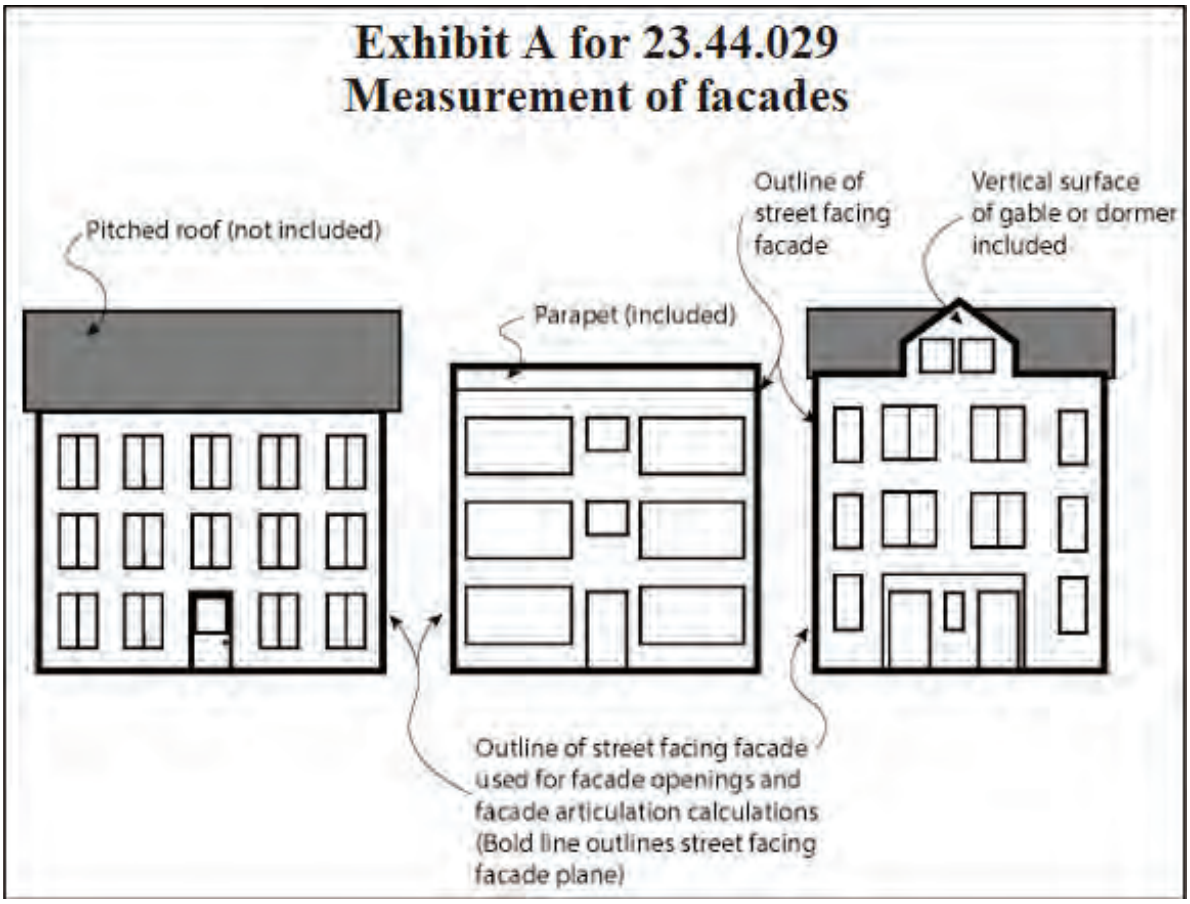
5. For projects with multiple attached or detached dwelling units that are located on a corner lot, at least one pedestrian entry shall be located facing each street.

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.

Table A for 23.45.504 Permitted and prohibited uses		
Uses	**Permitted and prohibited uses by zone**	
	LR1, LR2, and LR3	**MR and HR**
A. All residential uses	P	P
B. Institutions	P/CU [1]	P/CU [1]
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 [2]	X/CU [2]
D.2. Park and ride facilities in parking garages	X/P [3]	X/P [3`]
E. Parks and ((~~playgrounds including customary~~)) <u>open space</u> uses	P	P
F. Ground-floor commercial uses	RC/P [4]	RC/P ((4)) ,5
G. Medical service uses other than permitted ground-floor commercial uses	P/X [6]	P/CU/X [6]

Table A for 23.45.504 Permitted and prohibited uses		
Uses	**Permitted and prohibited uses by zone**	
	LR1, LR2, and LR3	**MR and HR**
H. Uses not otherwise permitted in Landmark structures	CU	CU
I. Cemeteries	P/X [7]	P/X [7]
J. Community gardens	P	P
K. Parking, flexible-use	X/P [8]	P [8]
L. Heat recovery incinerators	CU	CU
M. Human service use	P	P
((~~L~~))N. All other uses	X	X

Key to Table A for 23.45.504
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
Footnotes to Table A for 23.45.504

[1] 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.

[2] 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.

[3] 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.

[4] Permitted in development that meets the requirements of Section 23.42.055 and Chapter 23.46 or in development that meets the standards of subsection 23.45.504.D even if it is not located in a zone that includes an RC designation

Table A for 23.45.504 Permitted and prohibited uses		
Uses	**Permitted and prohibited uses by zone**	
	LR1, LR2, and LR3	**MR and HR**
[5] Subject to subsection 23.45.504.E except in zones that include an RC designation. [6] Subject to subsections 23.45.504.G and 23.45.506.F. [7] Subject to subsection 23.45.504.F. [8] 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 = 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~~))		

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((,)) 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.

((~~I~~)) 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.

((~~J~~)) F. 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.

Table A for 23.45.510
FAR limits in LR and MR zones

Zone	Zones with an MHA suffix	Zones without an MHA suffix
LR1	1.3, except 1.5 for stacked dwelling units	1.0
LR2	1.4, except 1.6 for stacked dwelling units [1]	1.1

Table A for 23.45.510 **FAR limits in LR and MR zones**		
Zone	**Zones with an MHA suffix**	**Zones without an MHA suffix**
LR3 outside urban centers and urban villages	1.8	1.2, except 1.3 for ((~~apartments~~)) stacked dwelling units
LR3 inside urban centers and urban villages	2.3	1.2, except 1.5 for ((~~apartments~~)) stacked dwelling units
MR	4.5	3.2
Footnote to Table A for 23.45.510 [1] Except that the FAR is ((~~1.6~~)) 1.8 for ((~~apartments~~)) stacked dwelling units that provide one or more outdoor amenity areas meeting the requirements of Section 23.45.522 and the following provisions are met: 1. The total amount of, outdoor amenity area is equal to at least 35 percent of the lot area; 2. No part of such amenity area has a width or depth of less than 20 feet; and 3. The outdoor amenity area is located at ground level or within 4 feet of finished grade.		

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.

Table B for 23.45.510 **FAR limits in HR zones**	
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.

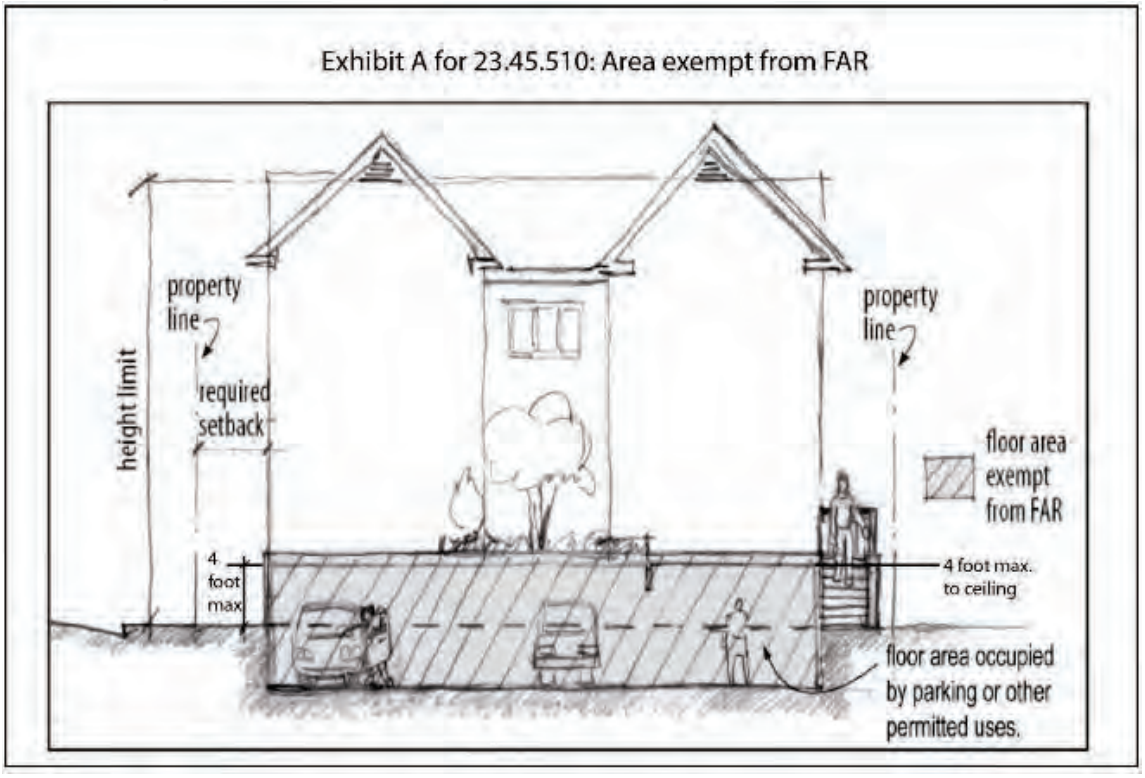
4. Portions of a story that extend no more than 4 feet above existing or finished grade, whichever is lower, excluding access, (see Exhibit A for 23.45.510), in the following circumstances:

a. ((~~All residential structures~~)) Stacked dwelling units in LR zones ((~~except as provided in subsection 23.45.510.D.4.b~~));

b. ((S~~ingle 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;

3) Submerged lands and areas within the shoreline setback; and

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.

Table A for 23.45.514
Structure height for LR zones (in feet)

((~~Housing~~)) Dwelling Unit type	**LR1**	**LR2**	**LR3 outside urban centers, urban villages, and Station Area Overlay Districts**	**LR3 in urban centers, urban villages, and Station Area Overlay Districts**
((~~Cottage housing developments~~	~~22~~	~~22~~	~~22~~	~~22~~))
((~~Rowhouse and townhouse developments~~)) Attached and detached dwelling units	((~~30~~)) 32	40 [1]	40 [1]	50 [1]
((~~Apartments~~)) Stacked dwelling units	((~~30~~)) 32	40 [1]	40 [1]	50 [2]

Footnotes for Table A for 23.45.514
[1] Except that the height limit is ((~~30~~)) 32 feet in zones without a mandatory housing affordability suffix.

Table A for 23.45.514 **Structure height for LR zones (in feet)**				
((~~Housing~~)) Dwelling Unit type	**LR1**	**LR2**	**LR3 outside urban centers, urban villages, and Station Area Overlay Districts**	**LR3 in urban centers, urban villages, and Station Area Overlay Districts**
[2] 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.

((~~Table A for 23.45.518~~ **~~Required setbacks in LR zones measured in feet~~**				
~~All LR zones~~	**~~Category of residential use~~**			
~~Setback~~	~~Cottage housing developments and single-family dwelling units~~	~~Rowhouse developments~~	~~Townhouse developments~~	~~Apartments~~

((~~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 [1]~~	~~5~~	~~0 where abutting another rowhouse development [2], 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 [3]~~	~~5 minimum~~	~~0 where abutting another rowhouse development [2], 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~~

~~[1] 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~~
~~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.~~ ~~[2] 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.~~ ~~[3] 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.))~~	

Table A for 23.45.518 **Required setbacks in Lowrise zones**	
Front	7 feet average, 5 feet minimum
Rear	If rear setback abuts an alley, 0 feet Otherwise, 7 feet average, 5 feet minimum
Side	5 feet

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.

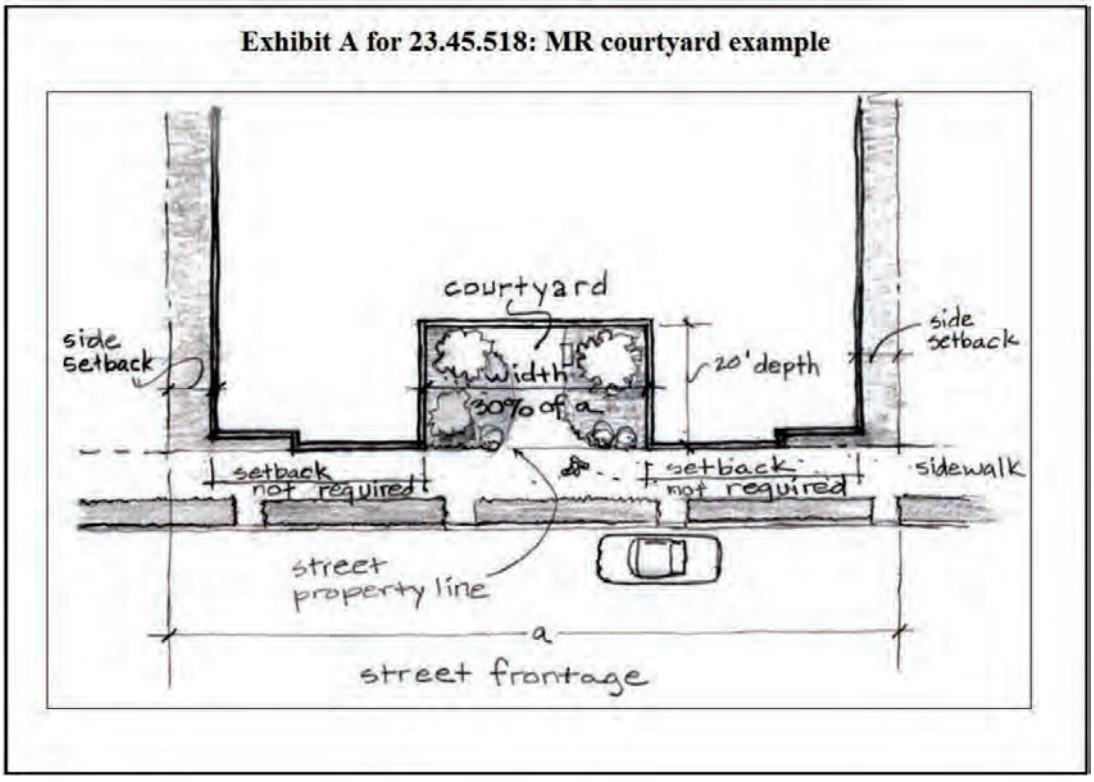
B. MR zones

1. Minimum setbacks for the MR zone are shown in Table B for 23.45.518 and subsection 23.45.518.B.2.

Table B for 23.45.518 MR setbacks measured in feet	
Setback location	**Required setback amount**
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: • a minimum width equal to 30 percent of the width of the abutting street frontage or 20 feet, whichever is greater; and • a minimum depth of 20 feet measured from the abutting street lot line.

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: • 42 feet or less in height: 7 average; 5 minimum • Above 42 feet in height: 10 average; 7 minimum

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.

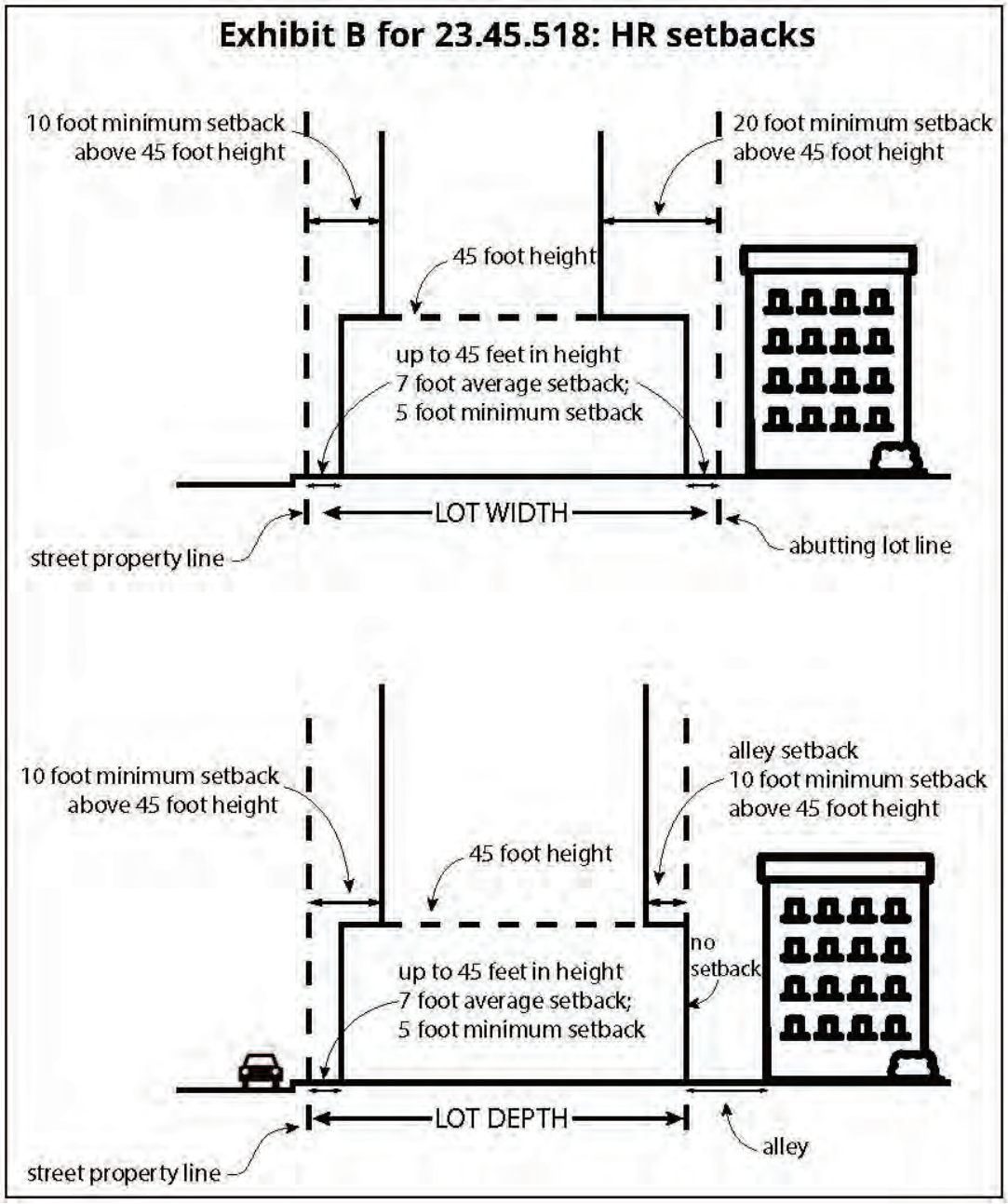
2) Parapets may extend up to 2 feet above the height at which the setback begins.

C. HR zones. Minimum setbacks for HR zones are shown in Table C for 23.45.518.

Table C for 23.45.518 HR setbacks measured in feet (see also Exhibit B for 23.45.518)	
Setbacks for structures 85 feet in height or less	
Structures 85 feet in height or less are subject to the setback provisions of the MR zone in subsection 23.45.518.B.	
Setbacks for structures greater than 85 feet in height	
Lot line abutting a street	For portions of a structure: • 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; • Greater than 45 feet in height: 10 minimum

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: • 45 feet or less in height: no setback required; • Greater than 45 feet in height: 10 minimum
Lot line that abuts neither a street nor alley	For portions of a structure: • 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; • Greater than 45 feet in height: 20 minimum

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~~)).

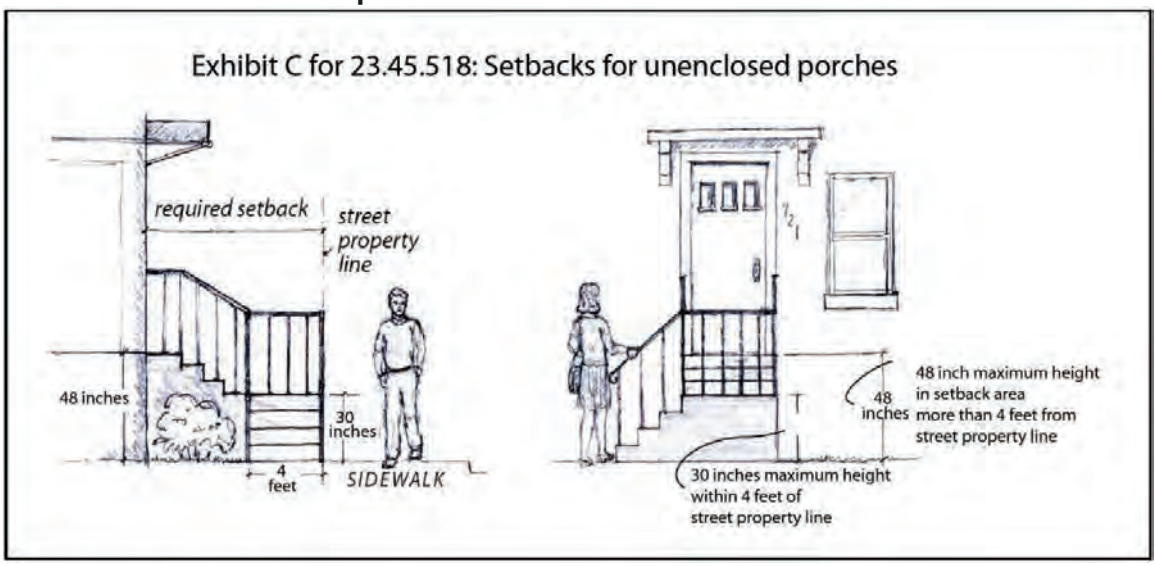
5. Unenclosed porches or steps

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.

((~~I~~)) H. Structures in required setbacks ((~~or separations~~)), except upper-level setbacks

1. Detached garages, carports, or other accessory structures are allowed in ((~~required separations 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.I.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.I.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:~~

~~a. Each above-grade GSI feature is no more than 4.5 feet tall, excluding piping;~~

~~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;~~

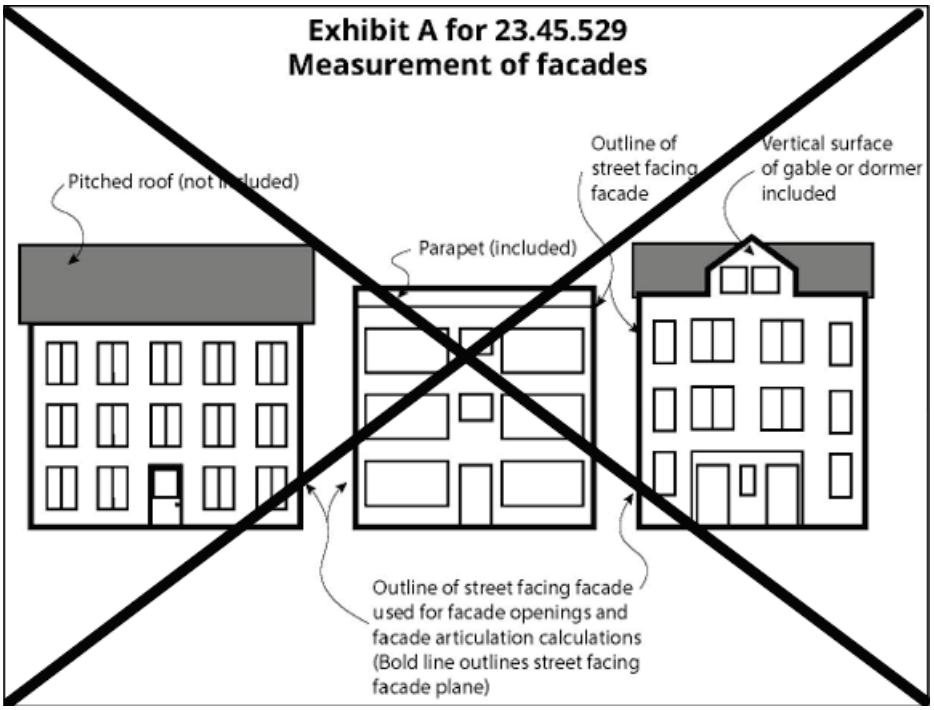
~~3. Promote livability in multifamily areas by providing a sense of openness and access to light and air; and~~

~~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~~

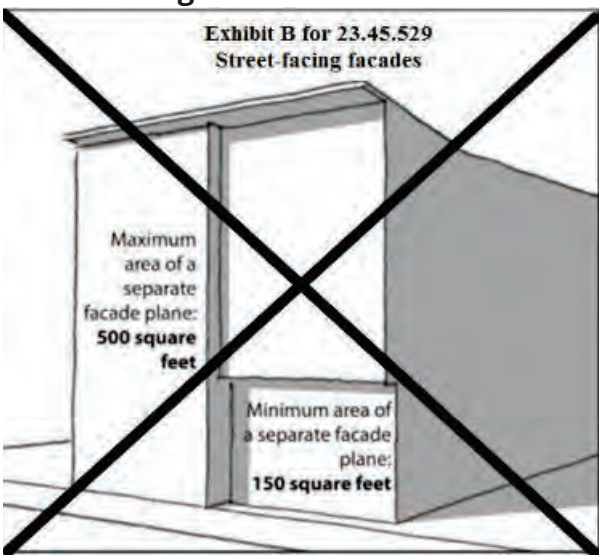
a. If a street-facing facade or portion of a street-facing facade is not vertical, the Director shall determine whether the facade is substantially vertical and required to comply with this subsection 23.45.529.C.

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.

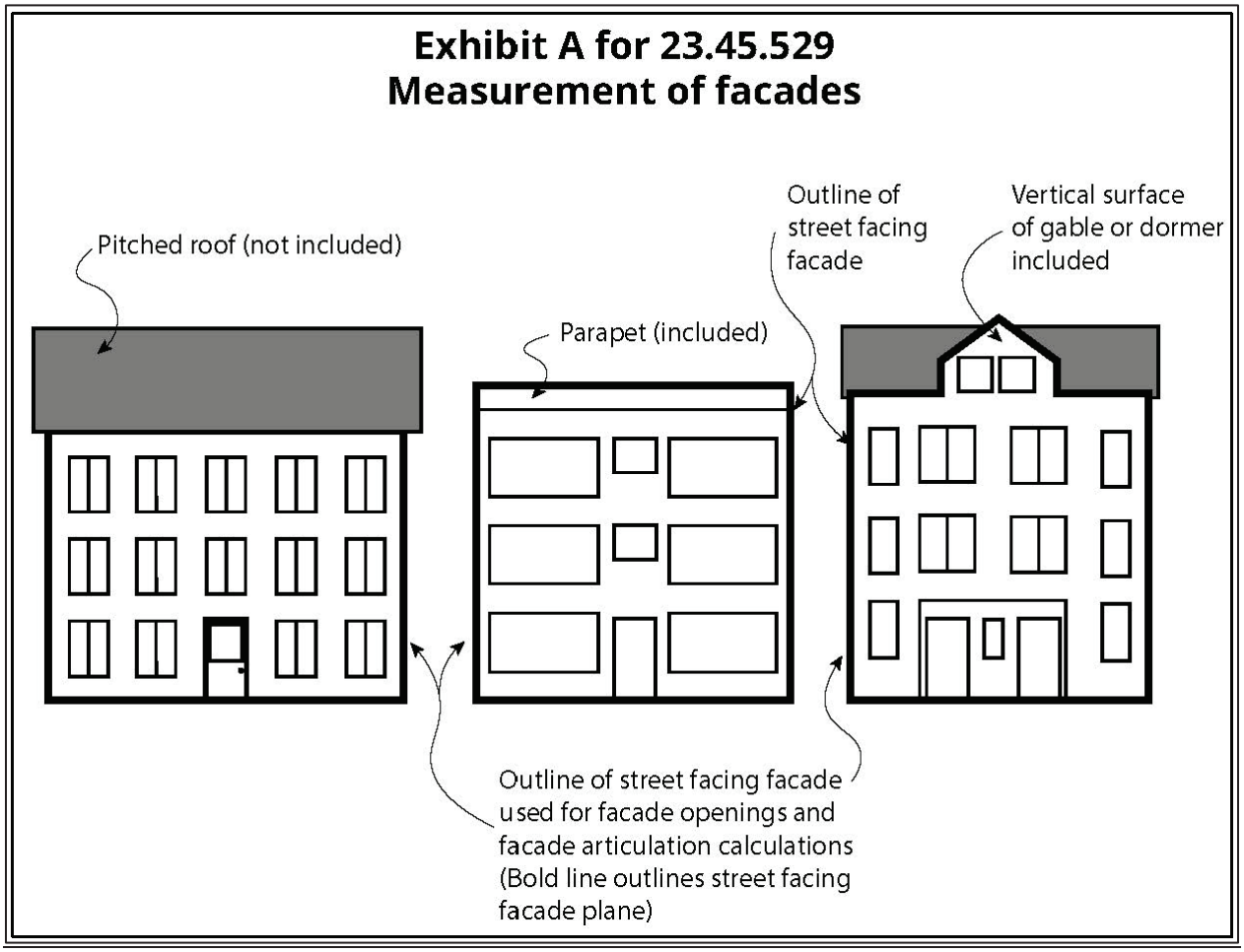
A. Application of provisions. The provisions of this Section 23.45.529 apply to all residential uses that do not undergo any type of design review pursuant to Chapter 23.41.

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.~~

((~~C~~)) 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

((~~1~~)) a. Development permitted pursuant to Section 23.42.055 is subject to the FAR limits as shown in Table A for 23.45.550.

Table A for 23.45.550 FAR limits for development permitted pursuant to Section 23.42.055		
Zone	**Base FAR**	**Maximum additional exempt FAR [1]**
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 [1] 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.

Table B for 23.45.550
Structure height for development permitted pursuant to Section 23.42.055

Zone	**Height limit (in feet)**
LR1	40
LR2	50
LR3 outside urban centers and urban villages	55

Table B for 23.45.550 **Structure height for development permitted pursuant to Section 23.42.055**	
Zone	**Height limit (in feet)**
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.

* * *

Table A for 23.47A.004 **Uses in Commercial zones**					
	Permitted and prohibited uses by zone [1]				
Uses	**NC1**	**NC2**	**NC3**	**C1**	**C2**
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 [2]	P	P	P	P	P
B. CEMETERIES	X	X	X	X	X
C. COMMERCIAL USES [3]					

Table A for 23.47A.004 Uses in Commercial zones						
		Permitted and prohibited uses by zone [1]				
Uses		NC1	NC2	NC3	C1	C2
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 [4]	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 [5]	P	P
	C.3.f. Theaters and spectator sports facilities	X	25	P	P	P
C.4. Food processing and craft work [2]		10	25	25	P	P
C.5. Laboratories, research and development		10	25	P	P	P
C.6. Lodging uses		X [6]	CU-25 [6]	P	P	P
C.7. Medical services [7]		10 [8]	25	P	P	P
C.8. Offices		10	25	P	35 [9]	35 [9]
C.9. Sales and services, automotive						

Table A for 23.47A.004 Uses in Commercial zones					
	Permitted and prohibited uses by zone [1]				
Uses	**NC1**	**NC2**	**NC3**	**C1**	**C2**
C.9.a. Retail sales and services, automotive	10 [10]	25 [10]	P [10]	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 [2]					
C.10.a. Retail sales and services, general [2]	10	25	P	P	P
C.10.b. Retail sales, multipurpose	10 [11]	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

Table A for 23.47A.004 Uses in Commercial zones					
	Permitted and prohibited uses by zone [1]				
Uses	**NC1**	**NC2**	**NC3**	**C1**	**C2**
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. HUMAN SERVICE AND ((~~INSTITUTIONS~~)) INSTITUTIONAL USES					
E.1. Human service and ((~~Institutions~~)) Institutional use 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 [12]	P	P	P	P	P
G. MANUFACTURING USES					
G.1. Manufacturing, light [2]	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

Table A for 23.47A.004 Uses in Commercial zones					
	Permitted and prohibited uses by zone [1]				
Uses	**NC1**	**NC2**	**NC3**	**C1**	**C2**
I. PUBLIC FACILITIES					
I.1. Jails					
I.1.a. Youth Service Centers	X	X	P [13]	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 [14]	P	P	P	P	CU [15]
((~~J.1. Residential uses not listed below~~	~~P~~	~~P~~	~~P~~	~~P~~	~~CU [15]~~
~~J.2. Caretaker's quarters~~	~~P~~	~~P~~	~~P~~	~~P~~	~~P~~
~~J.3. Congregate residence~~	~~P~~	~~P~~	~~P~~	~~P~~	~~CU [15]~~
~~J.4. Low-income housing~~	~~P~~	~~P~~	~~P~~	~~P~~	~~P~~))
K. STORAGE USES					
K.1. Mini-warehouses	X	X	25	40	P
K.2. Storage, outdoor	X	X	X [16]	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					

Table A for 23.47A.004 Uses in Commercial zones					
	Permitted and prohibited uses by zone [1]				
Uses	**NC1**	**NC2**	**NC3**	**C1**	**C2**
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 [17]	X	25	P	P	P
L.2.d.i. Park and ride facilities on surface parking lots [18]	X	CU-25	CU	CU	CU
L.2.d.ii. Park and ride facilities in parking garages	X	P [19]	P [19]	P [19]	P [19]
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

Table A for 23.47A.004
Uses in Commercial zones

Uses	Permitted and prohibited uses by zone [1]				
	NC1	**NC2**	**NC3**	**C1**	**C2**
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
M. UTILITY USES					
M.1. Communication utilities, major [20]	X	X	X	CCU	CCU
M.2. Communication utilities, minor [20]	P	P	P	P	P
M.3. Power plants	X	X	X	X	X
M.4. Recycling	X	X	X	P	P/CU [21]
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

((~~KEY~~)) Key to Table A for 23.47A.004
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

Table A for 23.47A.004
Uses in Commercial zones

	Permitted and prohibited uses by zone [1]				
Uses	**NC1**	**NC2**	**NC3**	**C1**	**C2**

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

Footnotes to Table A for 23.47A.004

[1] 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).

[2] 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.

[3] For commercial uses with drive-in lanes, see Section 23.47A.028.

[4] Subject to subsection 23.47A.004.H.

[5] Permitted at Seattle Center.

[6] Bed and breakfasts in existing structures are permitted outright with no maximum size limit.

[7] 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.

[8] 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.

[9] 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.

Table A for 23.47A.004 **Uses in Commercial zones**					
	Permitted and prohibited uses by zone [1]				
Uses	**NC1**	**NC2**	**NC3**	**C1**	**C2**

[10] 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.

[11] Grocery stores meeting the conditions of subsection 23.47A.010.E are permitted up to 23,000 square feet in size.

[12] Subject to subsection 23.47A.004.G.

[13] Permitted pursuant to subsection 23.47A.004.D.7.

[14] Residential uses may be limited to 20 percent of a street-level street-facing facade pursuant to subsection 23.47A.005.C.

[15] Residential uses are conditional uses in C2 zones ((~~under~~)) subject to subsection 23.47A.006.A.3, except that low-income housing is allowed outright or as otherwise provided ((~~above in Table A for 23.47A.004 or~~)) in subsection 23.47A.006.A.3.

[16] Permitted at Seattle Center; see Section 23.47A.011.

[17] 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.

[18] 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.

[19] Permitted outright, except prohibited in the SAOD.

[20] See Chapter 23.57, Communications regulations, for regulation of communication utilities.

[21] 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.

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~~)) F. 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.

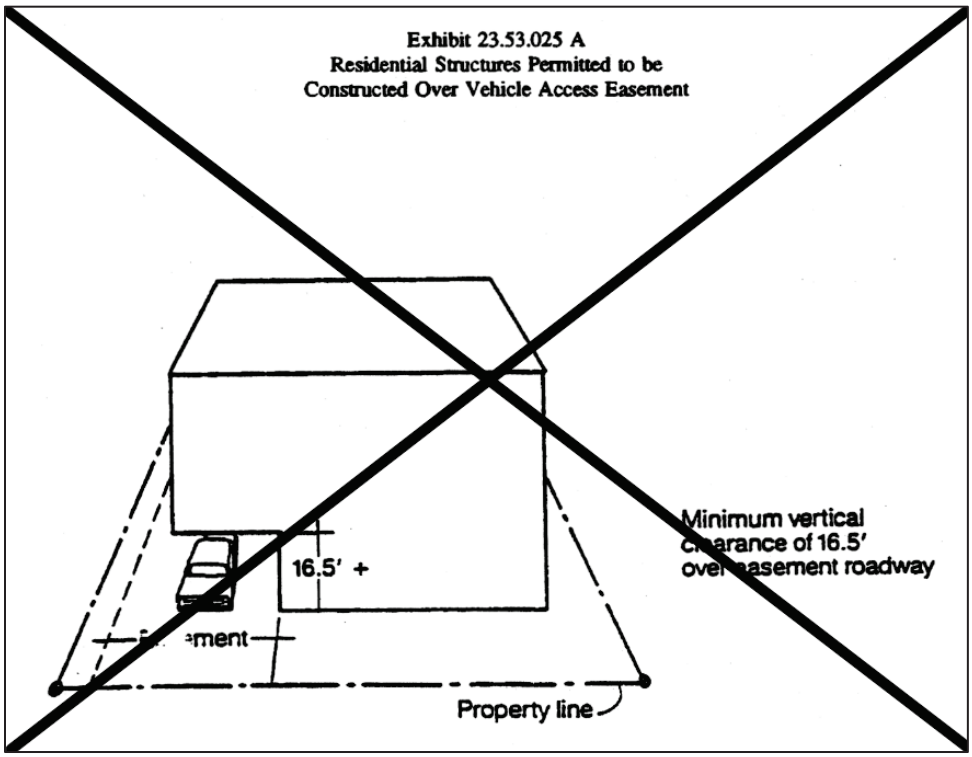
((~~G~~)) H. Vertical ((~~Clearance Above Easements~~)) clearance above easements. When an easement serves fewer than ten ((~~(10)~~)) residential units and crosses a residentially zoned lot, portions of structures may be built over the easement provided that a minimum vertical clearance of ((~~sixteen and one-half (16 ½)~~)) 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~~)).)

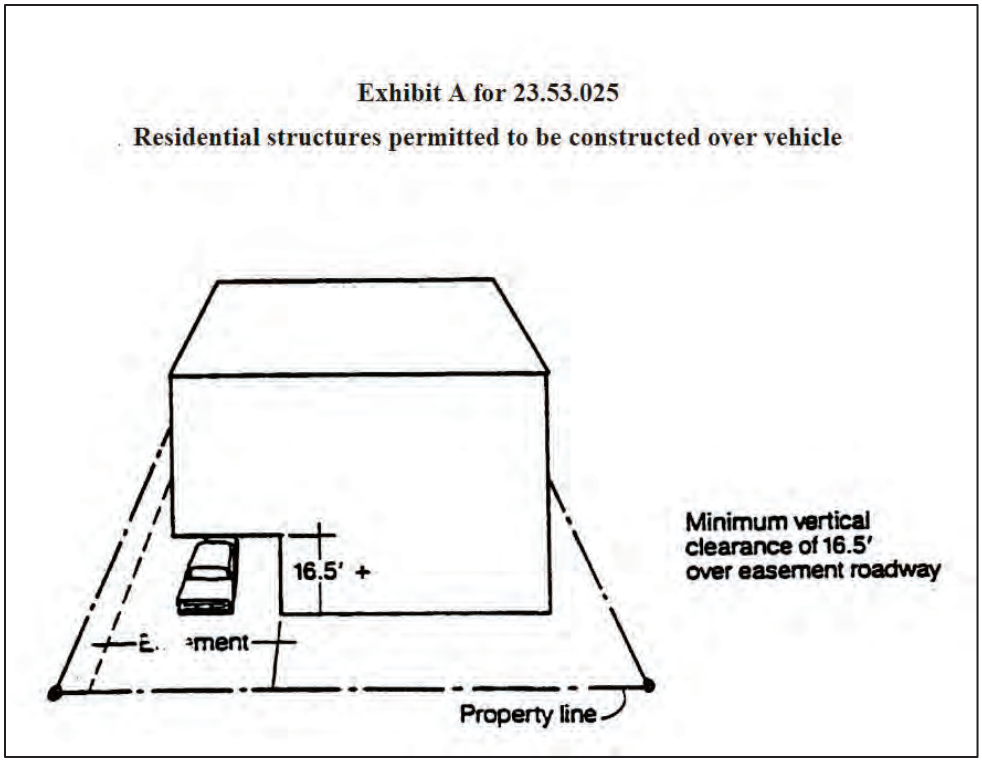
((~~H~~)) I. Exceptions ((~~From Access Easement Standards~~)) from access easement standards. The Director, in consultation with the Fire Chief, may modify the requirements for easement width and surfacing for properties located in environmentally critical areas or their buffers when it is determined 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.

Table A for 23.54.015
Required parking for ((~~non-residential~~)) nonresidential uses other than institutions

Use			**Minimum parking required**
I. General ((~~non-residential~~)) nonresidential uses (other than institutions)			
A.	AGRICULTURAL USES [1]		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 [2]	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 [3]	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 [4]	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~~)) <u>nonresidential</u> 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.	((~~Non-residential~~)) Nonresidential uses in urban centers or the Station Area Overlay District [5]		No minimum requirement
J.	((~~Non-residential~~)) Nonresidential uses in urban villages that are not within an urban center or the Station Area Overlay District, if the ((~~non-residential~~)) nonresidential use is located within a frequent transit service area [5]		No minimum requirement
K.	((~~Non-residential~~)) Nonresidential uses permitted in MR and HR zones pursuant to Section 23.45.504		No minimum requirement
L.	((~~Non-residential~~)) Nonresidential uses permitted in II zones		No minimum requirement

Footnotes for Table A for 23.54.015

[1] No parking is required for urban farms or community gardens in residential zones.

[2] 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. [3] For indoor sports and recreation uses that exceed 25,000 square feet in size in a Manufacturing Industrial Center, the minimum requirement is ((~~1~~)) one space for each 2,000 square feet. [4] The amount of required parking is calculated based on the maximum number of staff or animals the center is designed to accommodate. [5] 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.	

Table B for 23.54.015 **Required parking for residential uses**		
Use		**Minimum parking required**
I. General residential uses		
((~~A.~~	~~Adult family homes~~	~~1 space for each dwelling unit~~))
((~~B~~)) A.	Artist's studio/dwellings [1, 2, 3]	1 space for each 2 dwelling units
((~~C~~)) B.	Assisted living facilities [1, 2, 3]	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
((~~D~~)) C.	Caretaker's quarters [1, 2, 3]	1 space for each 2 dwelling units
((~~E~~)) D.	Congregate residences [1, 2, 3]	1 space for each 4 sleeping rooms
((~~F.~~	~~Cottage housing developments~~ [~~1~~]	~~1 space for each dwelling unit~~
~~G.~~	~~Floating homes~~	~~1 space for each dwelling unit~~))
((~~H~~)) E.	Mobile home parks [1, 2, 3]	1 space for each 2 mobile home lots as defined in Chapter 22.904
((~~I.~~	~~Multifamily residential uses, except as otherwise provided in this Table B for 23.54.015~~ [~~1, 2~~]	~~1 space per dwelling unit, or 1 space for each 2 small efficiency dwelling units~~))
~~J.~~	~~Nursing homes~~	~~1 space for each 2 staff doctors; plus 1 additional space for each 3 employees; plus 1 space for each 6 beds~~))

Table B for 23.54.015 **Required parking for residential uses**		
Use		**Minimum parking required**
((~~K~~))F.	((~~Single-family dwelling units~~)) Housing [1, 2, 3, 4]	1 space for each 2 dwelling units
II. Residential use requirements for specific areas		
((~~L~~)) G.	All residential uses within urban centers or within the Station Area Overlay District [2]	No minimum requirement
((~~M~~)) H.	All residential uses ((~~in commercial, RSL, and multifamily zones~~)) 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 or within ½ mile of a major transit stop [2((4))]	No minimum requirement
I.	All residential uses within ½ mile of a major transit stop [2]	No minimum requirement
((~~N.~~	~~Multifamily residential uses within the University of Washington parking impact area shown on Map A for 23.54.015~~ [~~2~~]	~~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~~))
~~O.~~	~~Multifamily dwelling units, within the Alki area shown on Map B for 23.54.015~~ [~~2~~]	~~1.5 spaces for each dwelling unit~~

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

[1] For each moderate-income unit and each low-income unit, no minimum amount of parking is required.

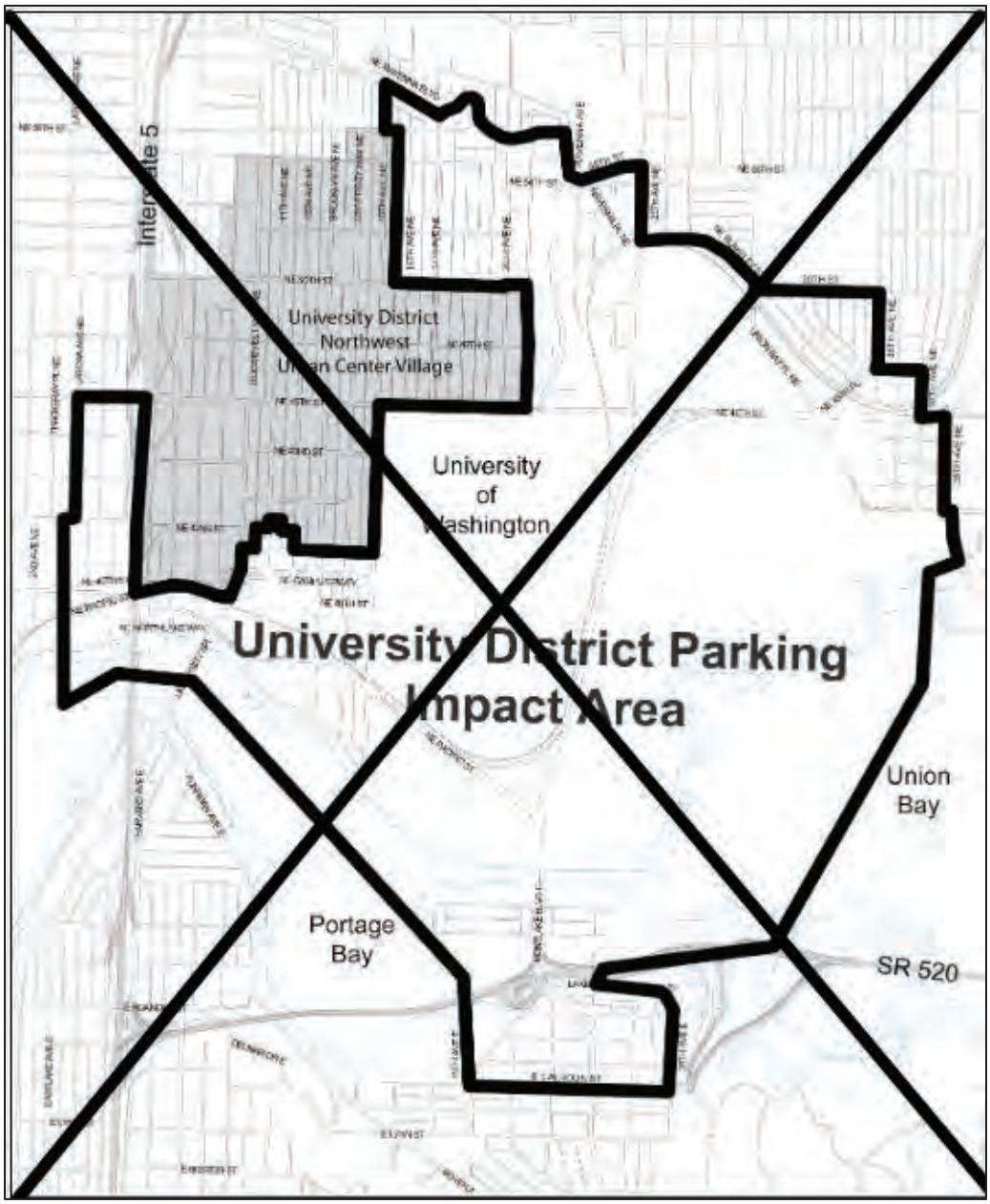
[2] The minimum amount of parking prescribed by Part I of Table B for 23.54.015 does not apply if a use, structure, or development qualifies for a ((~~greater or a~~)) lesser amount of minimum parking, including no parking, under any other provision of this Section 23.54.015. If more than one provision 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~~)).

[3] 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.

[4] 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.

((~~4. Except as provided in Footnote 4, the minimum amounts of parking prescribed by Part 1 of Table B for 23.54.015 apply within 1,320 feet of the Fauntleroy Ferry Terminal.~~))

((~~Map A for 23.54.015: University District Parking Impact Area~~))



((~~Map B for 23.54.015: Alki Area Parking Overlay~~))

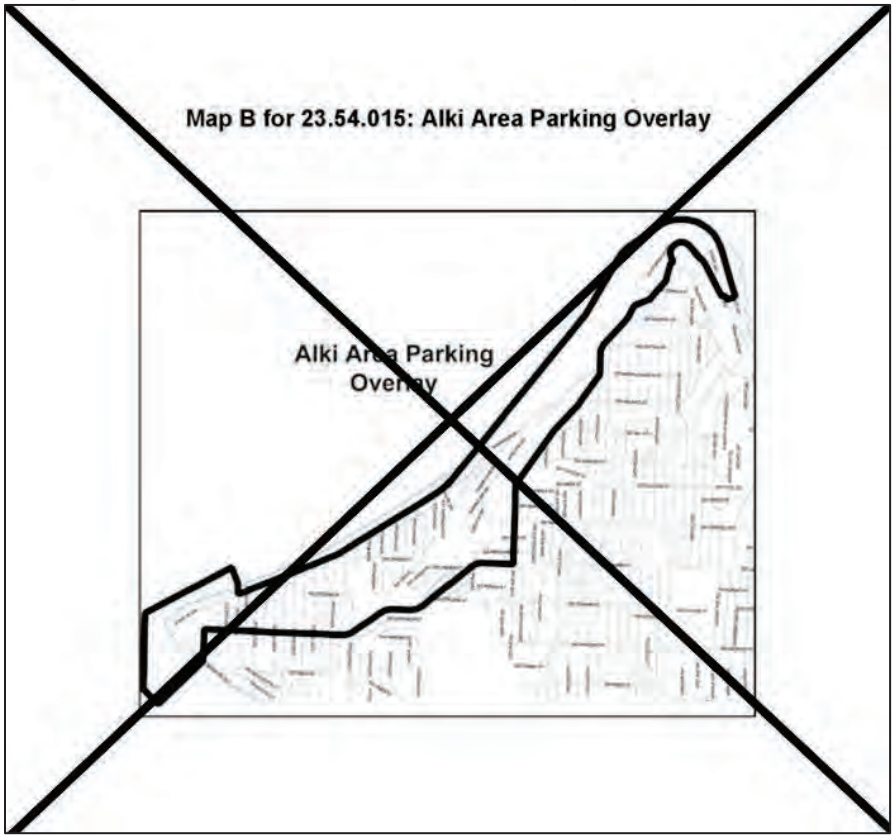


Table C for 23.54.015 **Required parking for public uses and institutions**		
Use		**Minimum parking required**
I. General public uses and institutions		
A.	Adult care centers [1, 2, 3]	1 space for each 10 adults (clients) or 1 space for each staff member, whichever is greater; plus 1 loading and unloading 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 [2, 3, 4, ((12)) 5]	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) [1, 6]	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 [1, ((5,)) 7, 8]	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 [((5)) 8]	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 ((~~neighborhood residential~~)) Neighborhood Residential 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 ((~~neighborhood residential~~)) Neighborhood Residential zones (existing) [1]	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 [1, ((~~5,~~)) 8, 9]	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 [1]	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 [1]	1 space for each 80 square feet of all auditoria and public assembly rooms
N.	Schools, private elementary and secondary [1]	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 [7, ((9,)) 10, 11]	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**
II. General public uses and institutions for specific areas		
Q.	General public uses, institutions and Major Institution uses, except hospitals, in urban centers or the Station Area Overlay District ((~~11~~)) 12	No minimum requirement
R.	General public uses and institutions, except hospitals, including institutes for advanced study in ((~~neighborhood residential~~)) Neighborhood Residential 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

[1] 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.

[2] 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.

[3] 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**
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. [4] 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. [5] ((~~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.~~)) <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> [6] 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.I. [7] 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. [8] <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>	

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. [9] 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. ((~~9~~))[10] 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 ((~~10~~)) ten percent or less than that for the existing auditorium or other place of assembly, then no additional parking is required. ((~~10~~)) [11] 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. ((~~11~~))[12] 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. ((~~12~~ ~~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** [1]				
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 [2]
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** [1]			
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. INSTITUTIONS			
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** [1]			
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 [3]			
D.1	Congregate residences [4]	1 per sleeping room	1 per 20 sleeping rooms. 2 spaces minimum
D.2	Multifamily structures other than townhouse and rowhouse developments [4, 5]	1 per dwelling unit	1 per 20 dwelling units
D.3	Single-family residences	None	None
D.4	Townhouse and rowhouse developments [5]	1 per dwelling unit	None
E. TRANSPORTATION FACILITIES			
E.1.	Park and ride facilities on surface parking lots	At least 20 [6]	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 [1]

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 [6]	Spaces for 2 percent of projected AM peak period daily ridership

Footnotes to Table D for 23.54.015

[1] Required bicycle parking includes long-term and short-term amounts shown in this Table D for 23.54.015.

[2] 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.

[3] 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.

[4] 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.

[5] 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).

[6] 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;

~~Table D for 23.54.015~~ ~~Parking for bicycles~~ [1]		
~~USE~~	~~Bike parking requirements~~	
	~~Long-term~~	~~Short-term~~
~~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((~~s~~)) 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. ((~~1.~~)) 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 manuevering.

* * *

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.

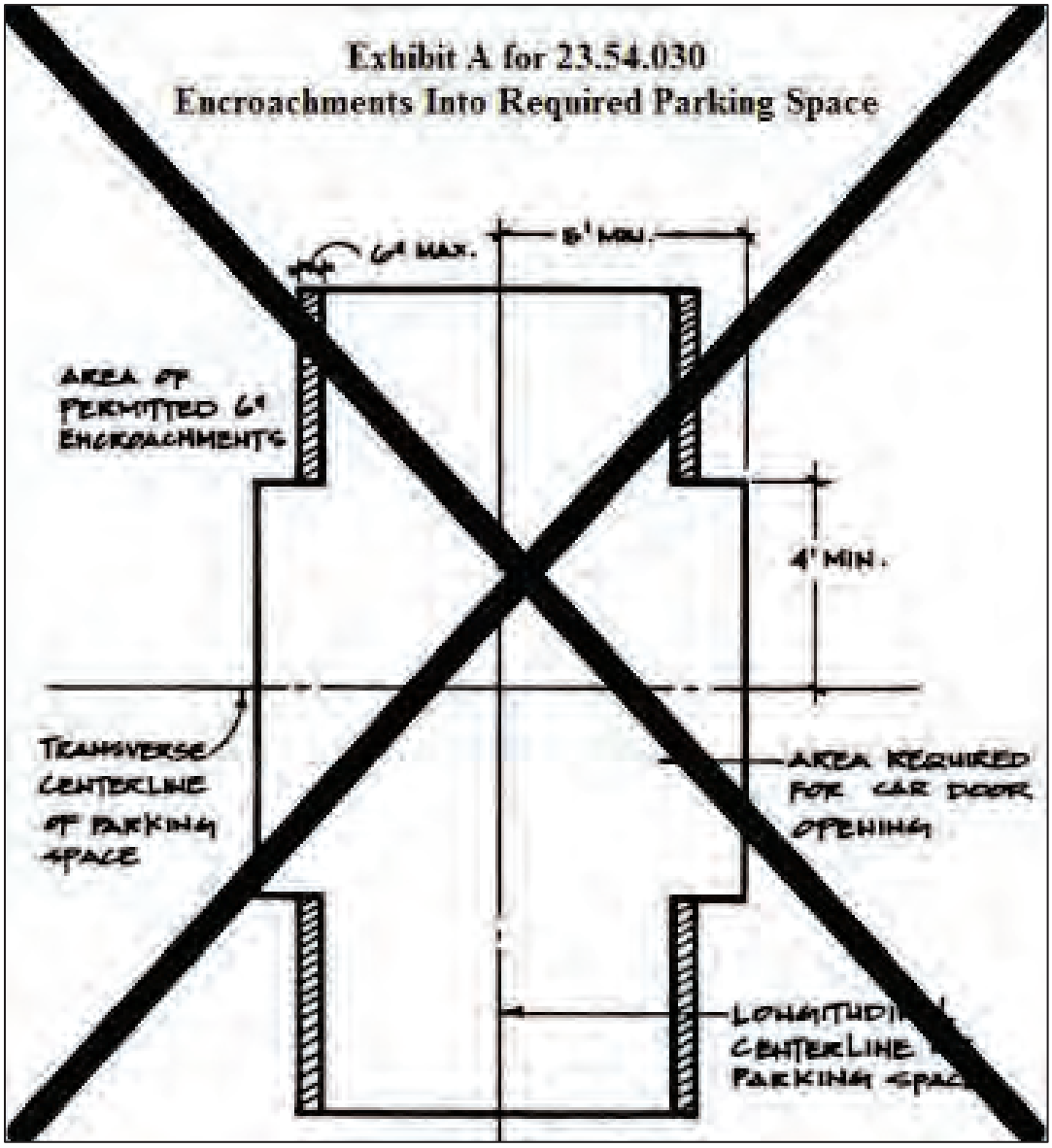
b. A minimum length of 19 feet or when more than one barrier-free parking space is provided, at least one shall have a minimum length of 19 feet, and other spaces may be the lengths of small, medium, or large spaces in approximate proportion to the number of each size space provided on the lot.

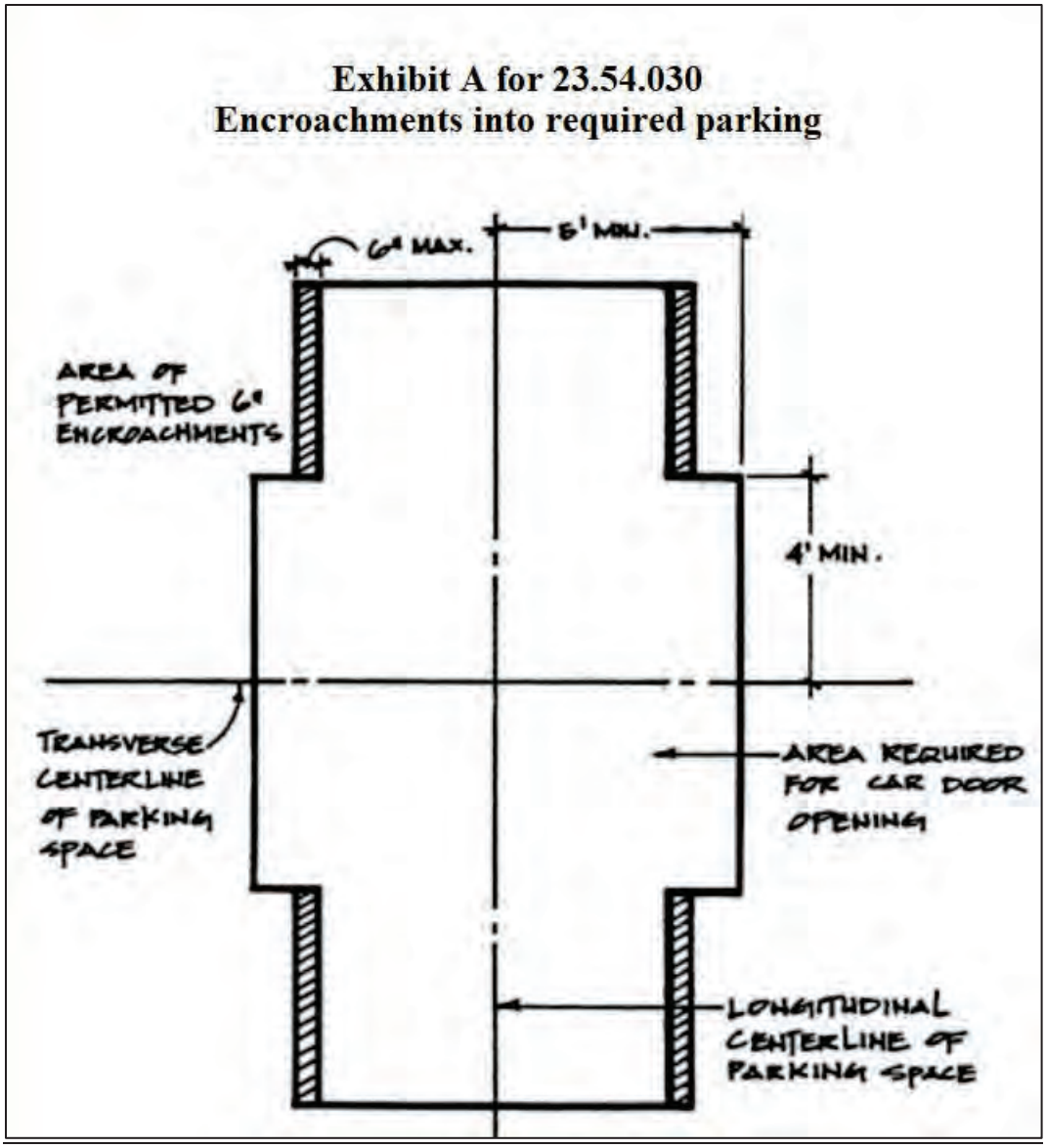
5. "Tandem parking" means a parking space equal to the width and two times the length of the vehicle size standards in subsections 23.54.030.A.1, 23.54.030.A.2, and 23.54.030.A.3 for the size of the vehicle to be accommodated.

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~~)) <u>into required parking space</u>





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:

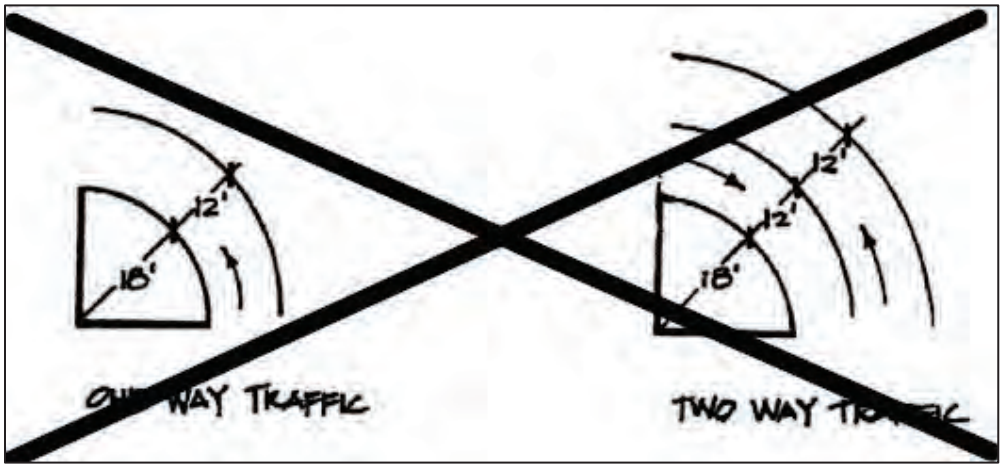
1) be a minimum of 16 feet wide, tapered over a 20 foot distance to a 10 foot opening at the lot line; or

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.

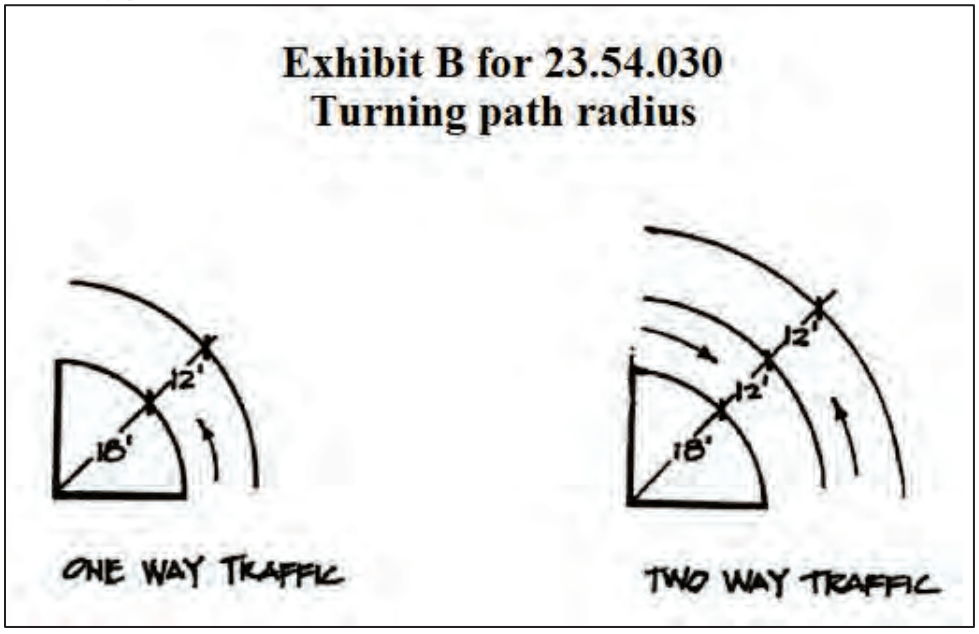
d. Driveways for two attached ((~~rowhouse or townhouse~~)) dwelling units may be paired so that there is a single curb cut providing access. The maximum width of the paired driveway is 18 feet.

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.

Table A for 23.54.030
Parking aisle dimensions

A	B	C	D	E	F	G
Parking Angle (in degrees)	Stall Width	Stall Length (in feet)	Aisle Width (in feet)[1]	Curb Depth Per Car (in feet)	Unit Width (in feet) [2]	Curb Length Per Car (in feet)
0°	Small	18	10	7.5	25	18
	Medium	20	10	8	26	20
	Large	24	12	8	28	24
45°	Small	15	11	15.91	42.82	10.61
	Medium	16	13	16.97	46.94	11.3
	Large	19	13	19.09	51.18	11.3
60°	Small	15	13	16.74	46.48	8.66
	Medium	16	15	17.86	50.72	9.24
	Large	19	17.5	20.45	58.41	9.24
75°	Small	15	16.5	16.43	49.36	7.76
	Medium	16	18.5	17.52	53.55	8.25
	Large	19	20	20.42	60.84 [2]	8.25
90°	Small	15	20	15	50	7.5
	Medium	16	22	16	54	8
	Large	19	24 [3]	19	62.0 [2]	8

Footnotes for Table A for 23.54.030

[1] 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.

[2] 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

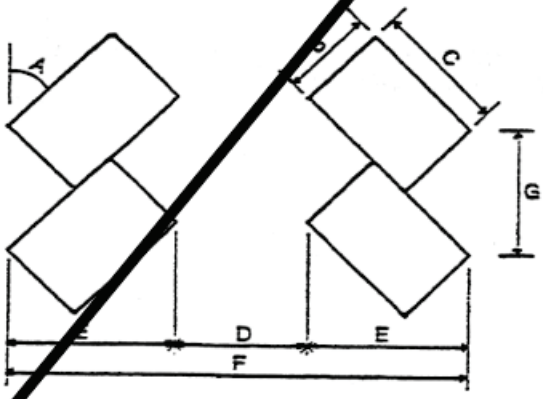
[3] For lots 44 feet in width or less, the Director may reduce the aisle width to as low as 20 feet if large parking spaces are provided at 90 degrees as long as the spaces are 9 feet wide.

A Parking Angle	B Stall Width	C Stall Length	D Aisle Width [1]	E Curb Depth Per Car	F Unit Width [3]	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	46.48	8.66
	8.0	16.0	15.0	17.86	50.72	9.24
	8.5	19.0	17.5	20.70	58.90	9.82
75°	7.5	15.0	16.5	16.43	59.36	7.76
	8.0	16.0	18.5	17.52	53.54	8.25
	8.5	19.0	20.0	20.55	61.10 [3]	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 [2]	24.0 [2]	19.0	62.0 [3]	8.5

[1] 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.

[2] 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.

[3] 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:

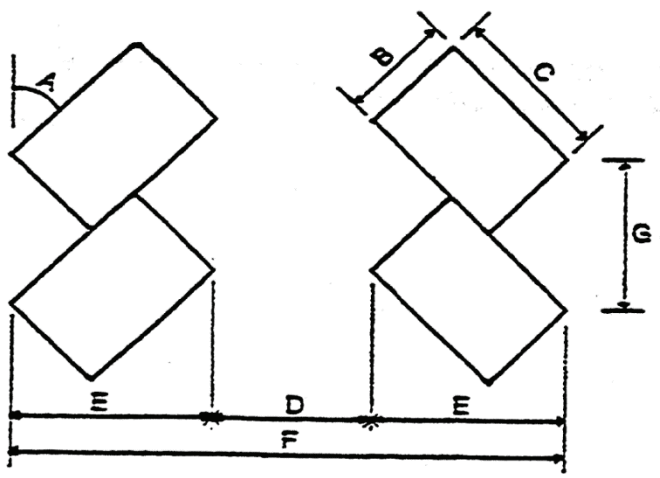
$E = C \sin A + B \cos A$

$G = B/\sin A$

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:~~

Table A for 23.54.030 **Curb cuts for lots not located on a principal arterial or easement frontage**	
Street or easement frontage of the lot	**Number of curb cuts permitted**
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:

Table B for 23.54.030 **Curb cuts for principal arterial street frontage**	
Street or easement frontage of the lot	**Number of curb cuts permitted**
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~~

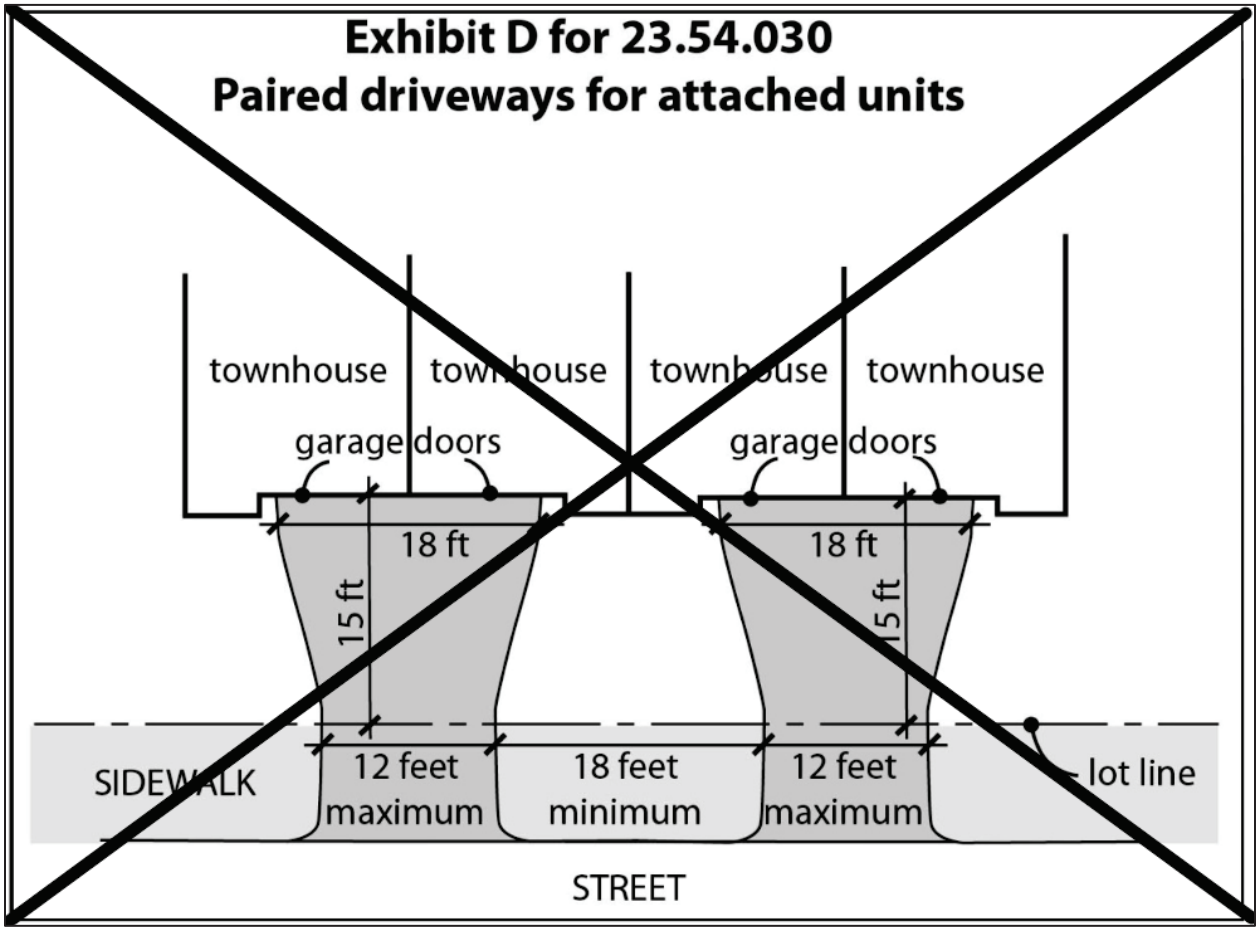
~~5) A curb cut may be less than the maximum width permitted but shall be at least as wide as the minimum required width of the driveway it serves.~~

~~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:~~

Table C for 23.54.030 **Number of curb cuts in residential zones, RC zones and the Major Institution Overlay District**	
Street frontage of the lot	**Number of curb cuts permitted**
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.

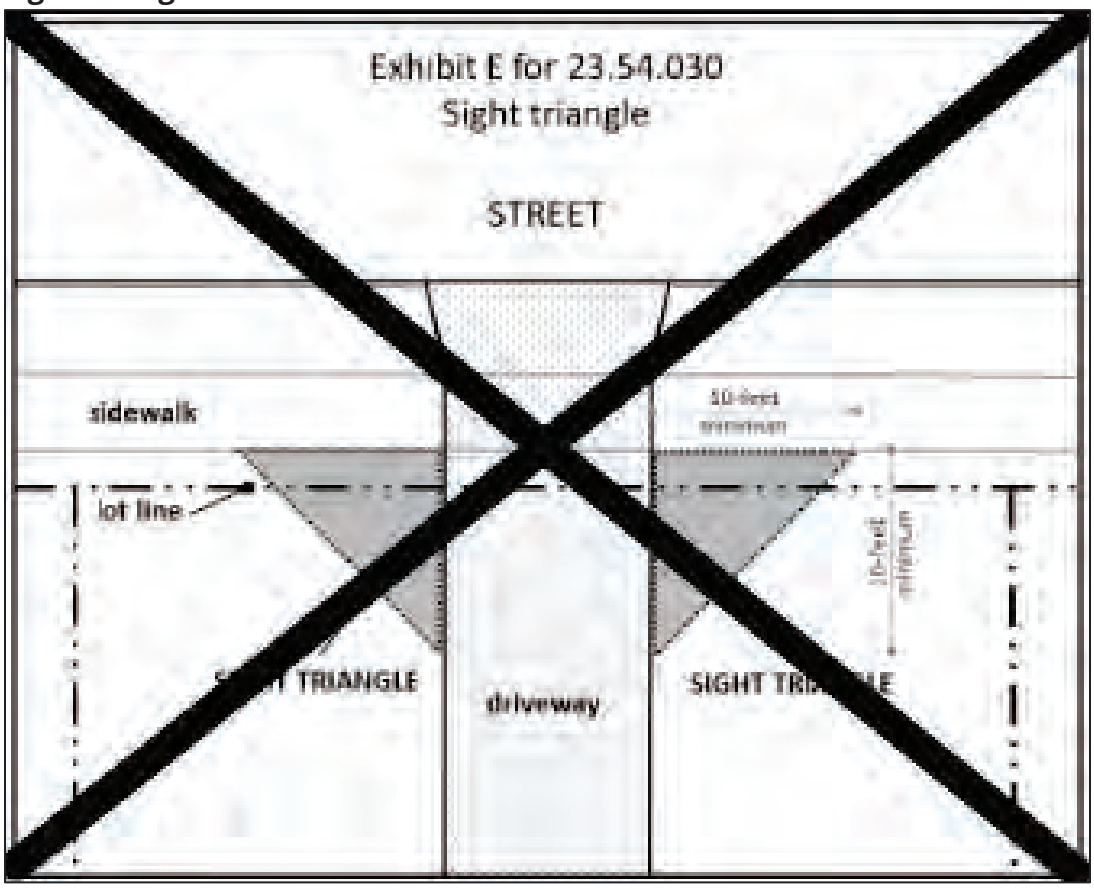
7. Curb cuts are not allowed on streets if alley access to a lot is feasible but has not been provided.

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.

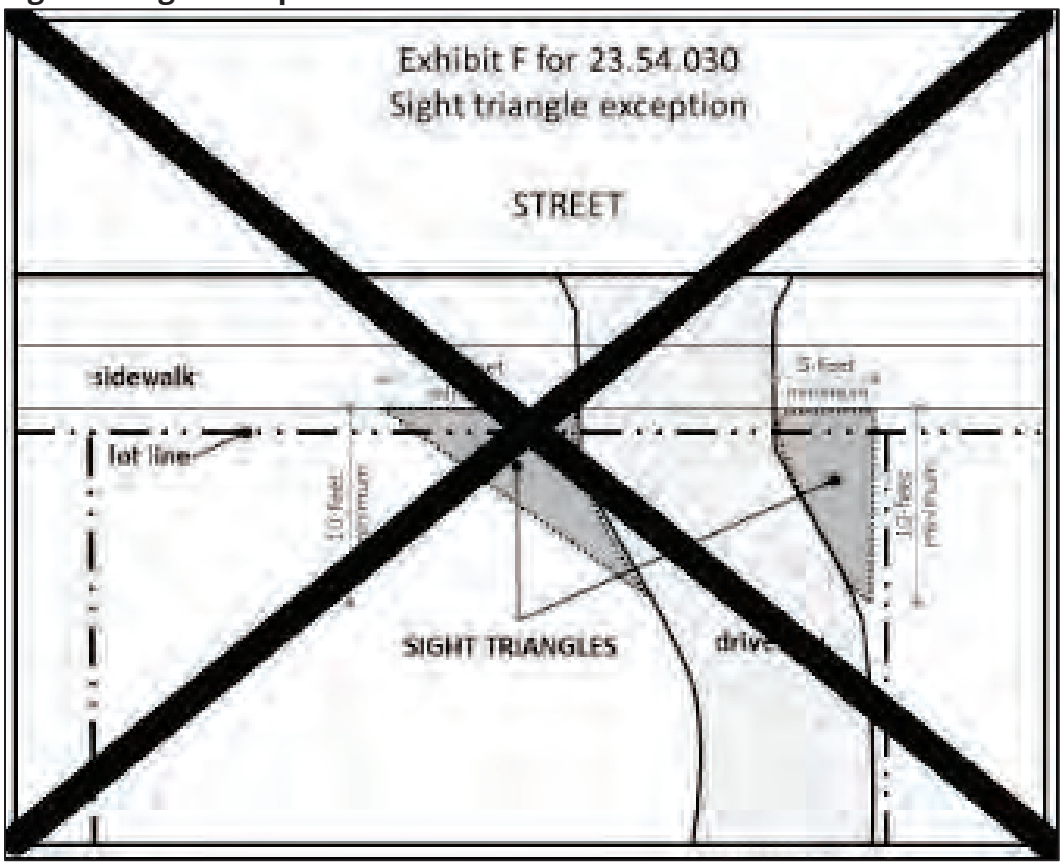
4. When the driveway or easement is less than 10 feet from the lot line, the sight triangle may be provided as follows:

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~~)) F. 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:

Table A for 23.54.031 **Curb cuts for lots not located on a principal arterial or easement frontage**	
Street or easement frontage of the lot	**Number of curb cuts permitted**
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:

Table B for 23.54.031 **Curb cuts for principal arterial street frontage**	
Street or easement frontage of the lot	**Number of curb cuts permitted**
160 feet or less	1
Greater than 160 feet up to 320 feet	2
Greater than 320 feet up to 480 feet	3

Table B for 23.54.031 **Curb cuts for principal arterial street frontage**	
Street or easement frontage of the lot	**Number of curb cuts permitted**
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.

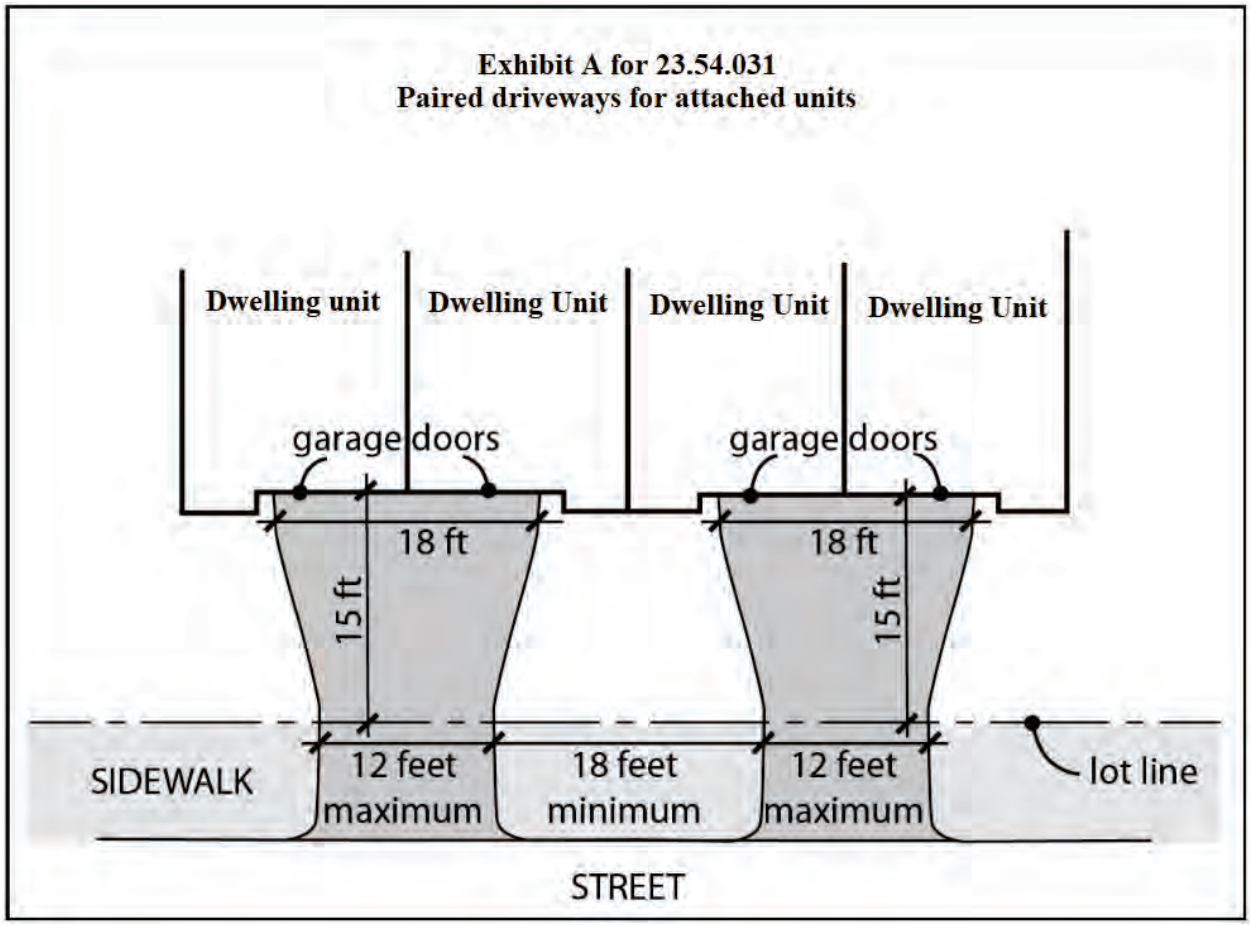
3. Distance between curb cuts

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:

Table C for 23.54.031 **Number of curb cuts in residential zones, RC zones and the Major Institution Overlay District**	
Street frontage of the lot	**Number of curb cuts permitted**
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.

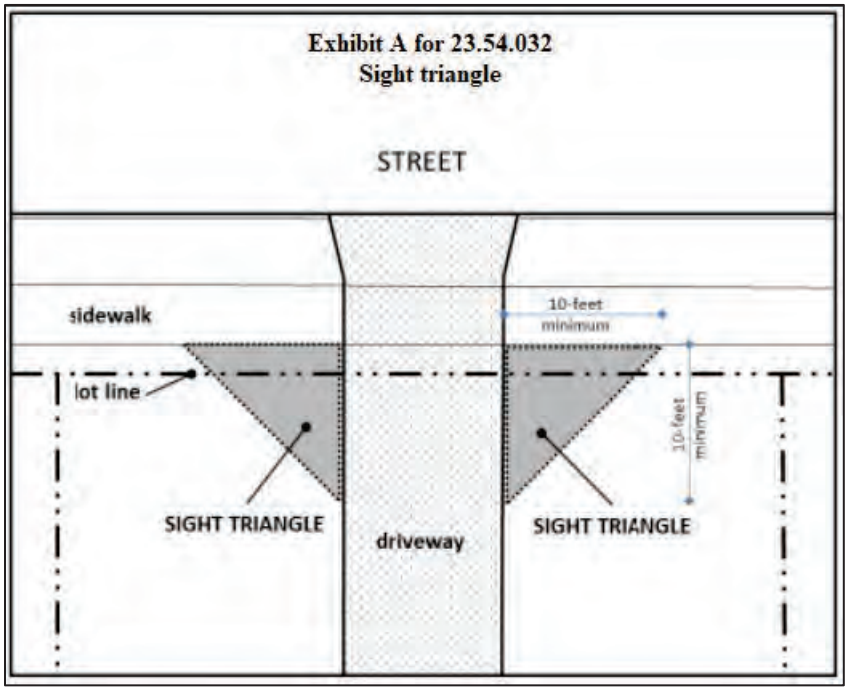
Section 39. A new Section 23.54.032 is added to the Seattle Municipal Code as follows

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.

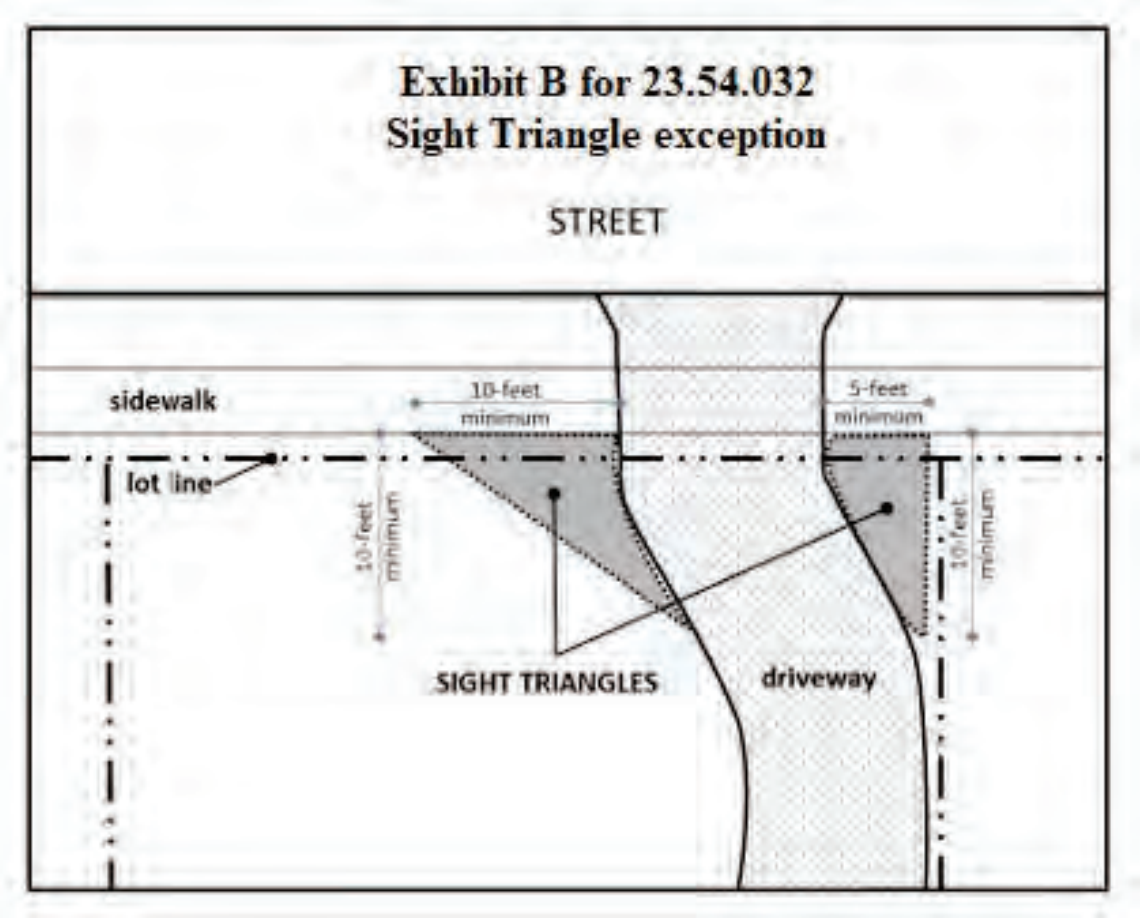
D. When the driveway or easement is less than 10 feet from the lot line, the sight triangle may be provided as follows:

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.

Table A for 23.54.037
Parking for bicycles [1]

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 [2]
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
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. INSTITUTIONS			
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

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 [3]			
D.1	Assisted Living Facility	None	None
D.2	Congregate residences [4, 5]	1 per sleeping room	1 per 20 sleeping rooms. 2 spaces minimum
D.3	Permanent supportive housing	None	None
D.4	Other residential uses [4, 5]	1 per dwelling unit	1 per 20 dwelling units, except none for projects with less than 20 dwelling units
E. TRANSPORTATION FACILITIES			
E.1.	Park and ride facilities on surface parking lots	At least 20 [6]	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
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 [6]	Spaces for 2 percent of projected AM peak period daily ridership

Footnotes to Table A for 23.54.037

[1] Required bicycle parking includes long-term and short-term amounts shown in this Table A for 23.54.037.

[2] 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.

[3] 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.

[4] 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.

[5] 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).

[6] 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 (((~~10~~))) 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

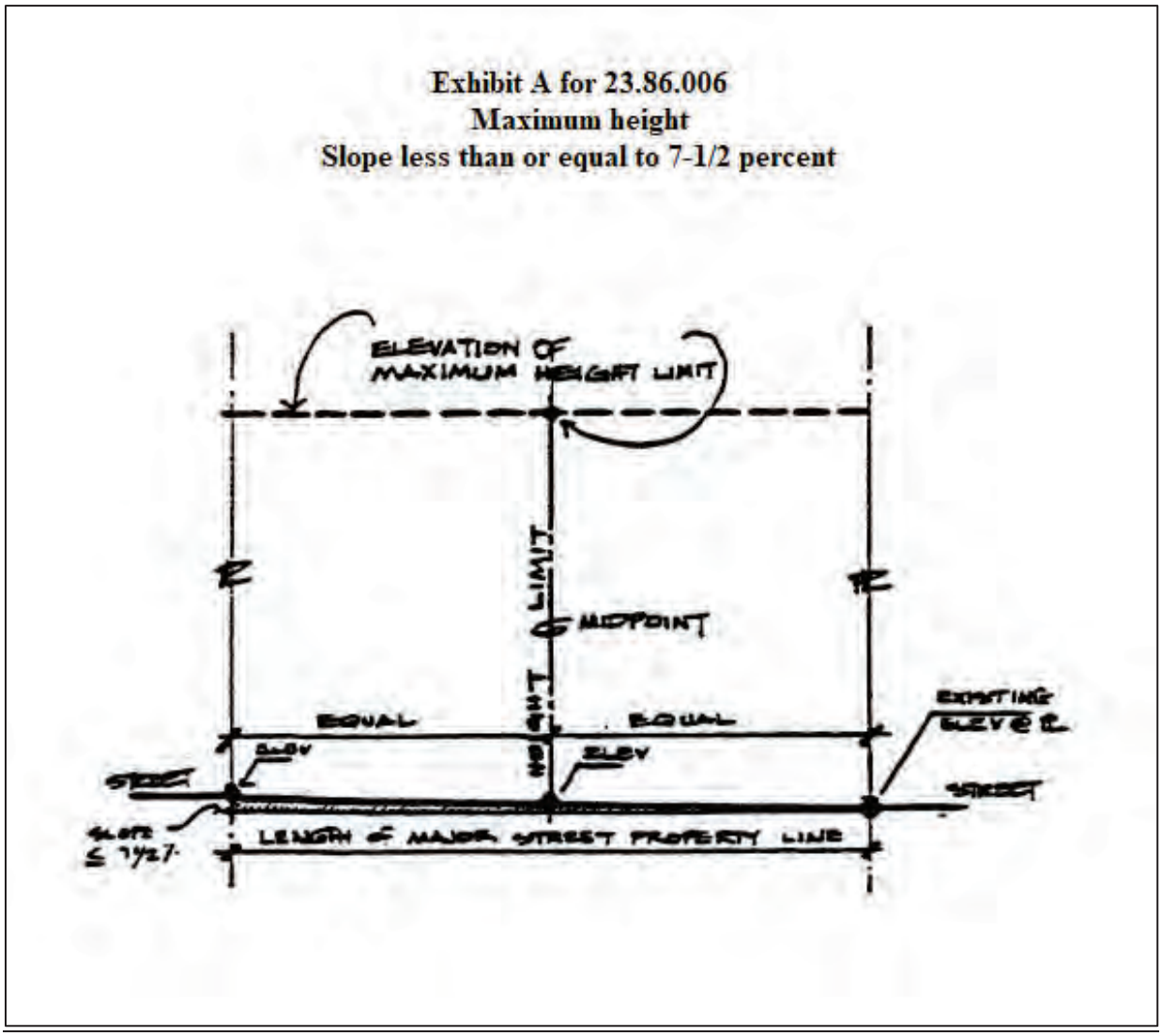
1. Determine the major street lot line, which shall be the lot's longest street lot line. When the lot has two or more street lot lines of equal length, the applicant shall choose the major street lot line.

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:

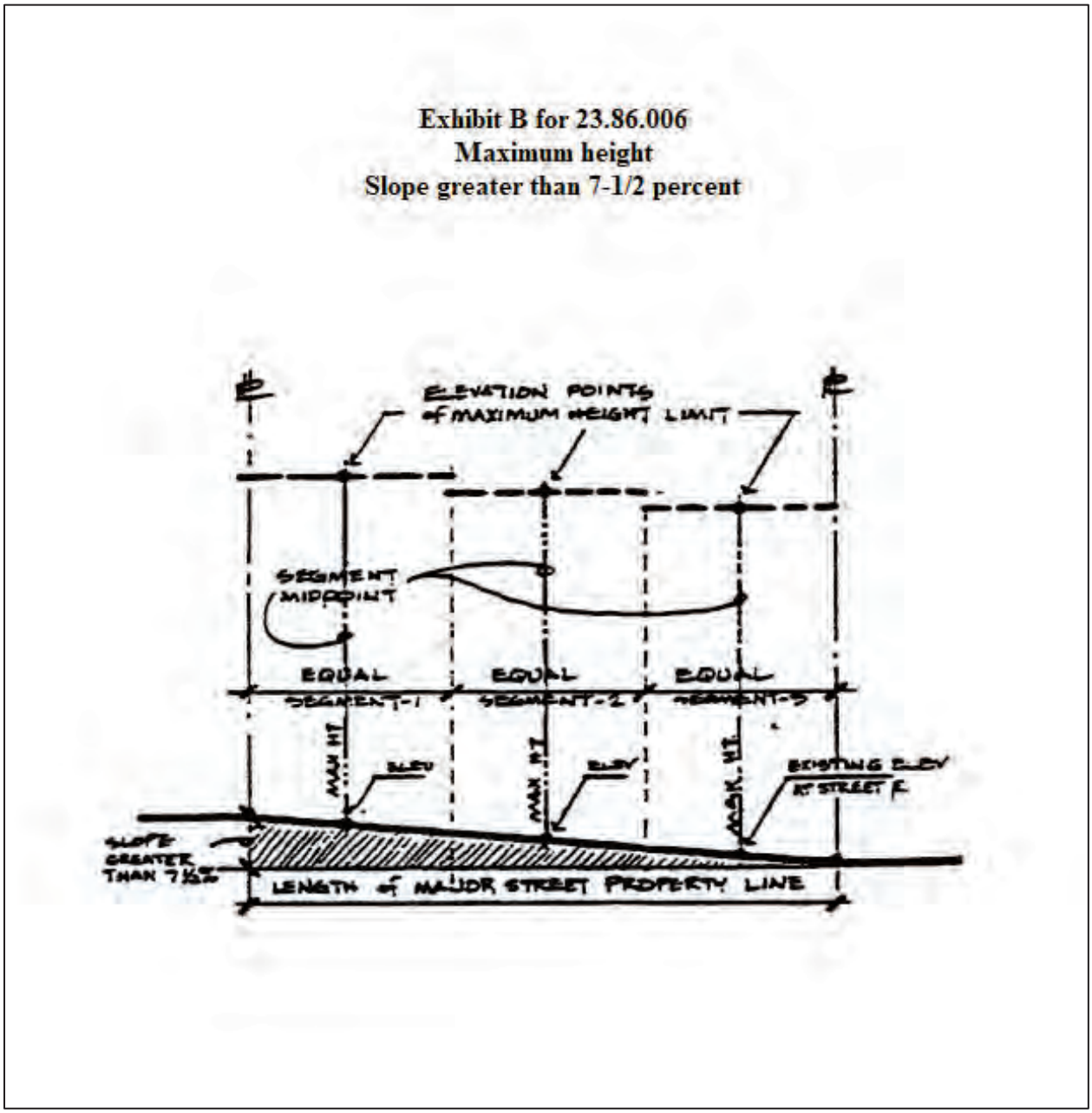
a. When the slope of the major street lot line is less than or equal to 7.5 percent, the elevation of maximum height shall be determined by adding the maximum permitted height to the existing grade elevation at the midpoint of the major street lot line. On a through-lot, the elevation of maximum height 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



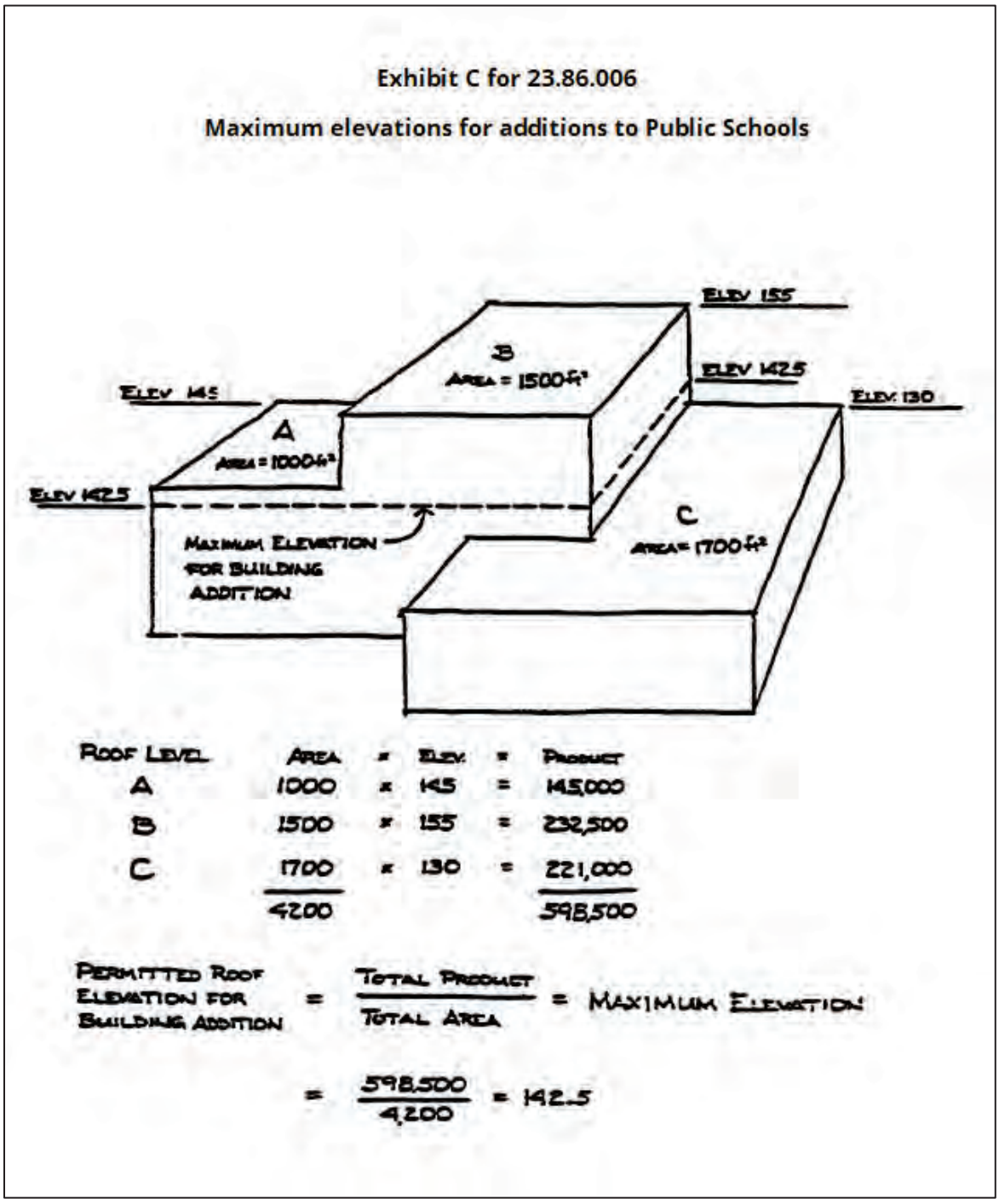
c. For lots with more than one street frontage, where there is no street lot line that is essentially parallel to the major street lot line, when a measurement has been made for the portion of the block containing the major street lot line, the next measurement shall be taken from the remaining street 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~~)) F. 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%

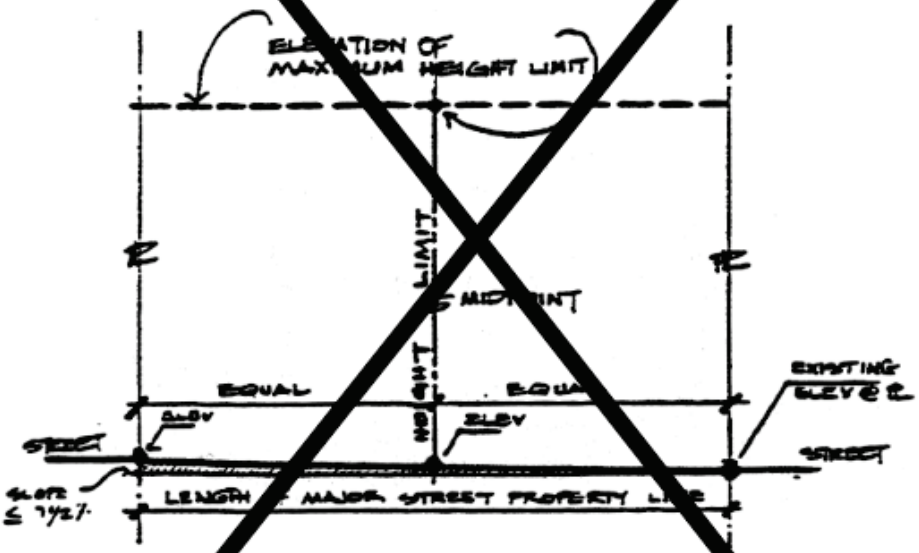


Exhibit 23.86.006 C
Maximum Height, Slope Greater Than 7-½%

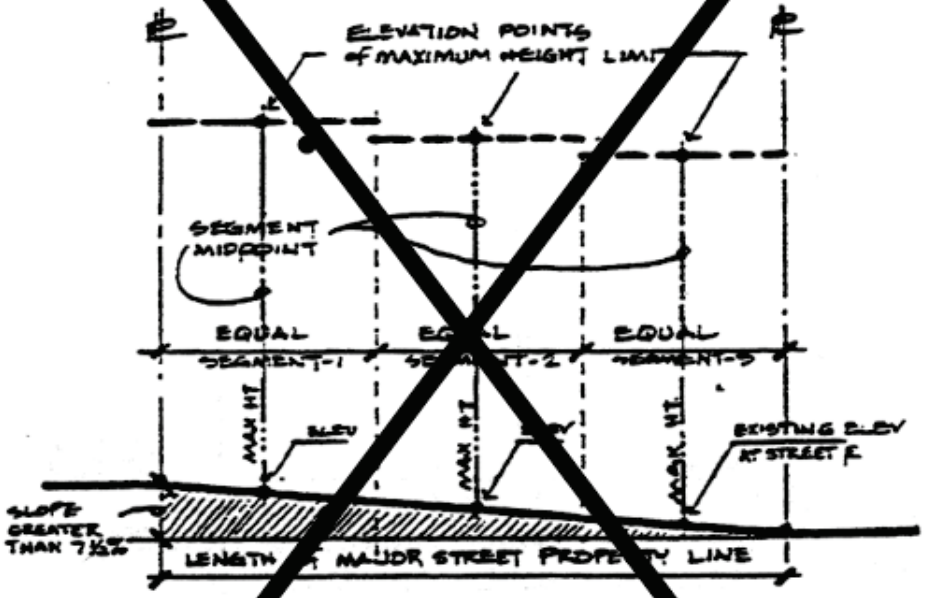
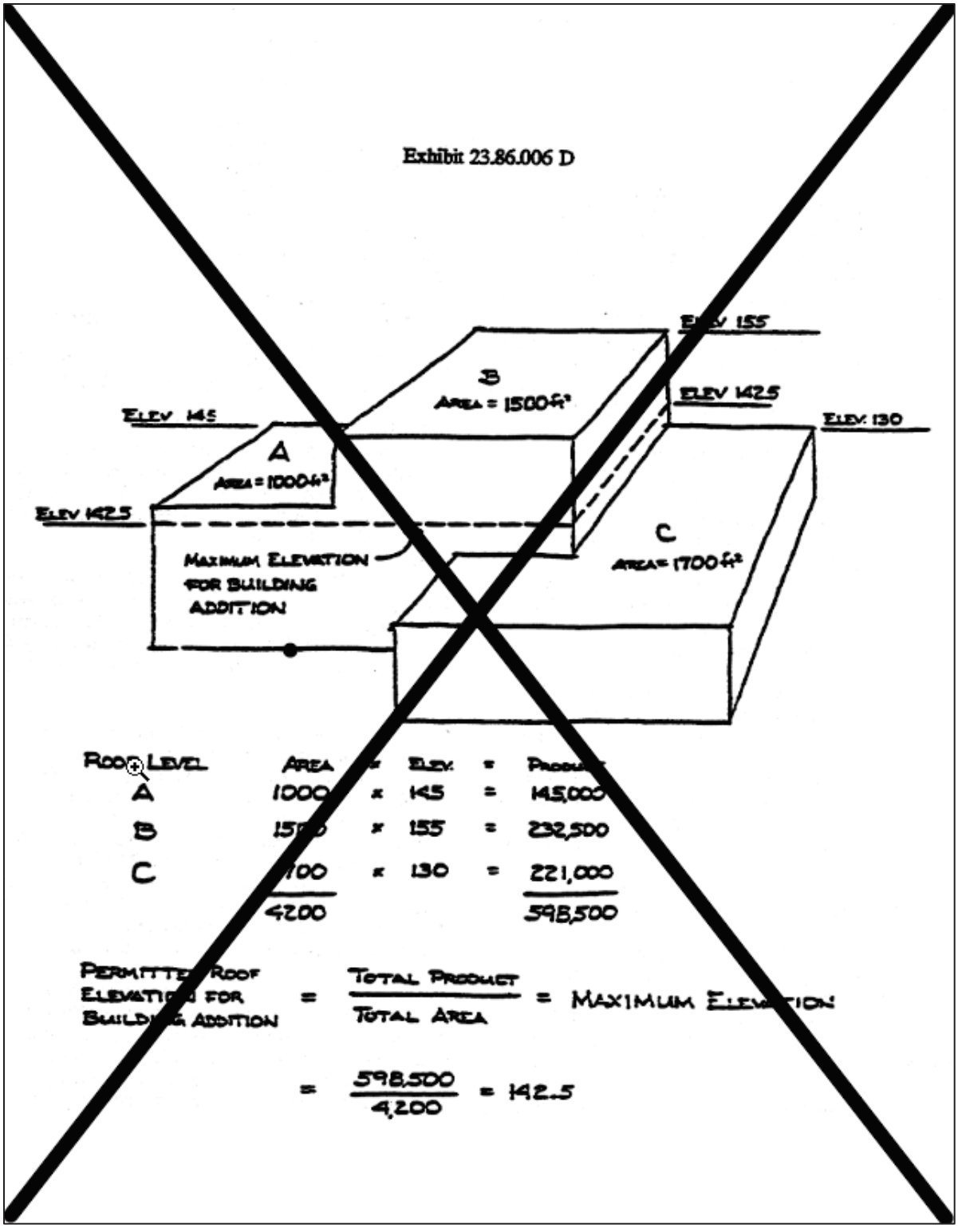


Exhibit 23.86.006 D



ROOF LEVEL	AREA		ELEV.	=	PRODUCT
A	1000	x	145	=	145,000
B	1500	x	155	=	232,500
C	1700	x	130	=	221,000
	4200				598,500

PERMITTED ROOF ELEVATION FOR BUILDING ADDITION = $\frac{\text{TOTAL PRODUCT}}{\text{TOTAL AREA}}$ = MAXIMUM ELEVATION

$= \frac{598,500}{4,200} = 142.5$

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 outdate lot coverage calculations.

((~~A. Lot coverage shall be calculated in accordance with Exhibit 23.86.008 A.~~

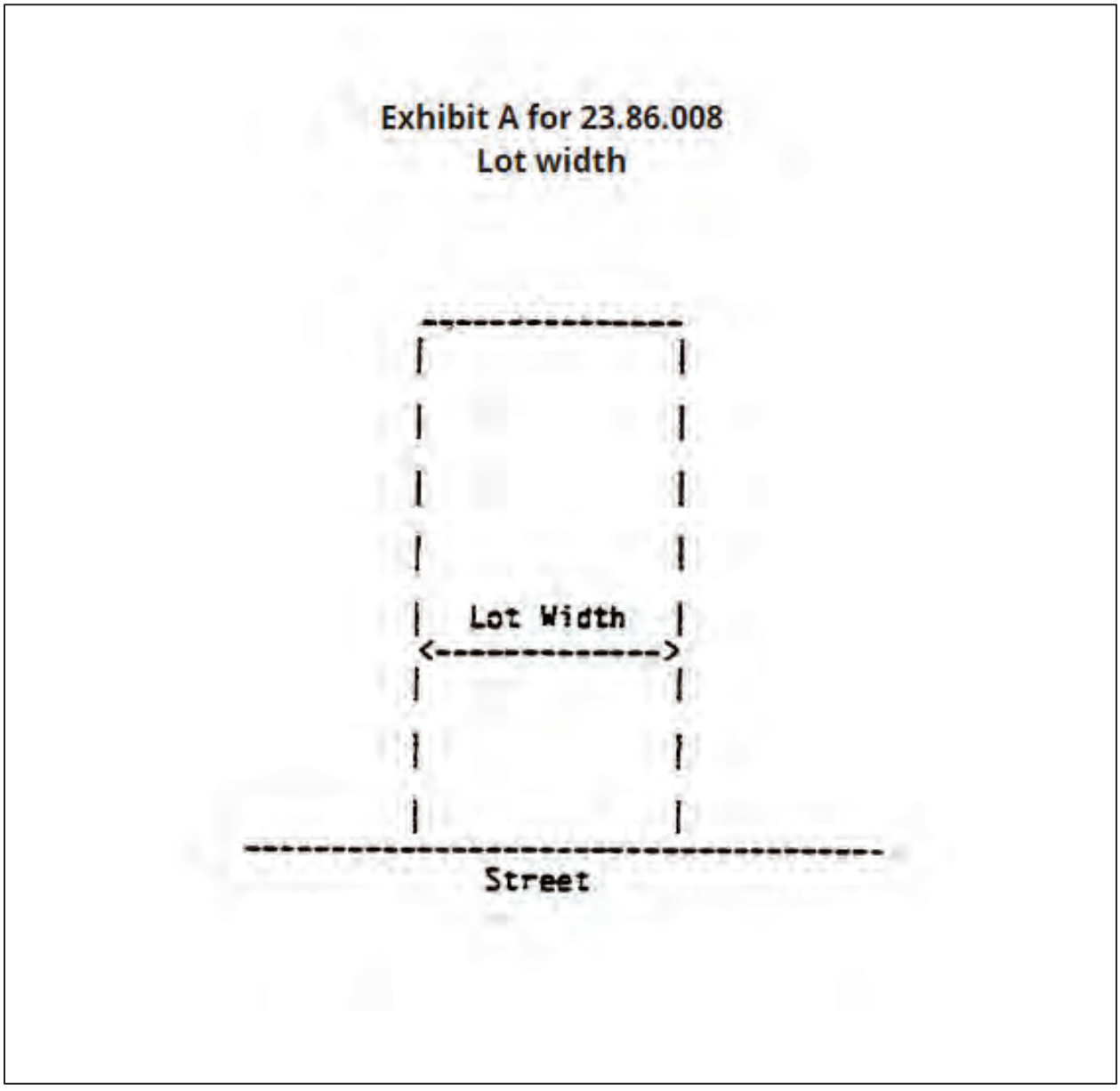
~~B. In neighborhood residential zones, lot depth shall be the length of the line extending between the front lot line or front lot line extended, and the rear lot line or lines, or in the case of a through lot, between the two (2) front lot lines or lines extended. This line shall be perpendicular to 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:~~))

((~~1~~)) 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 (((~~1~~))) 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

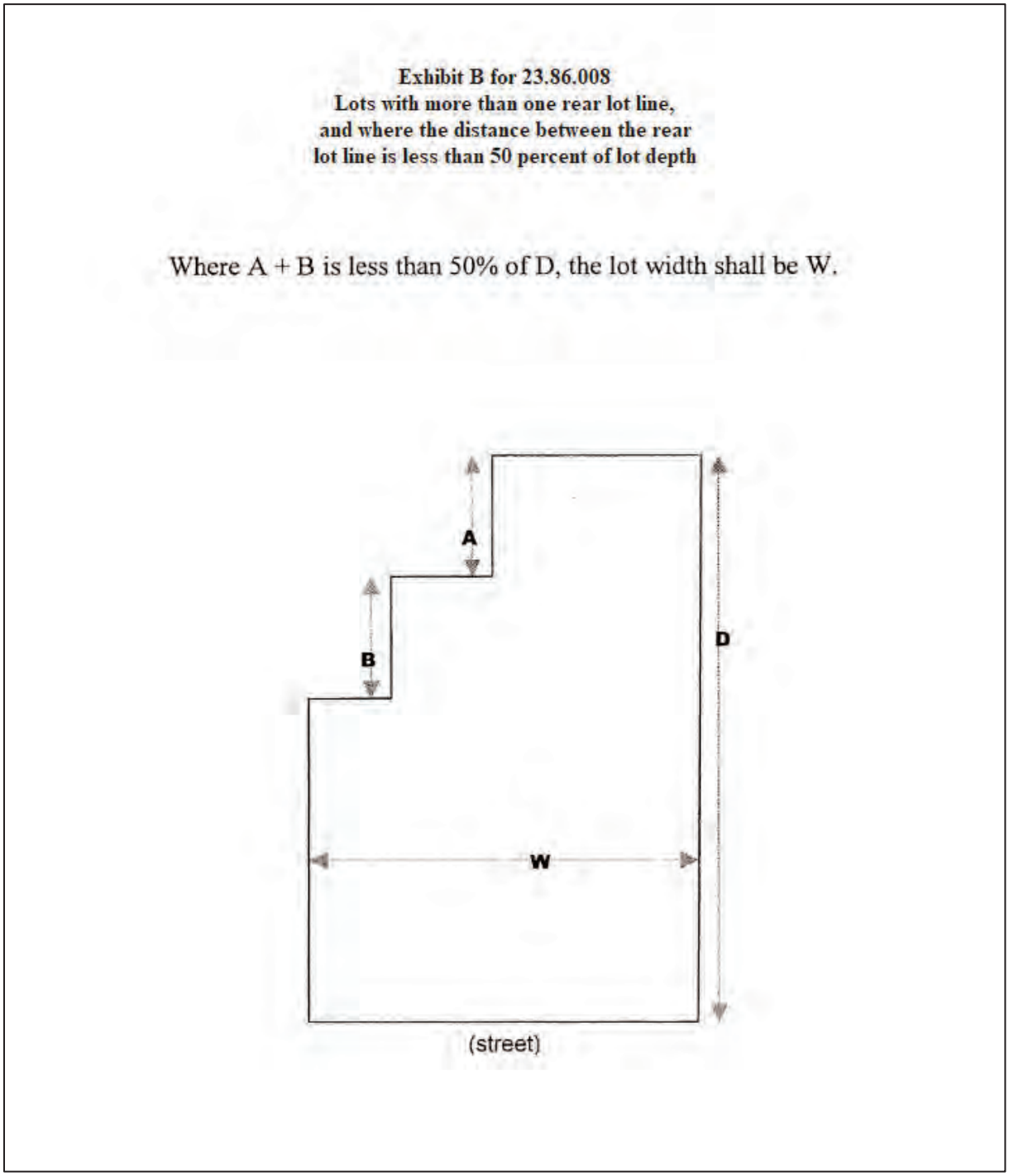
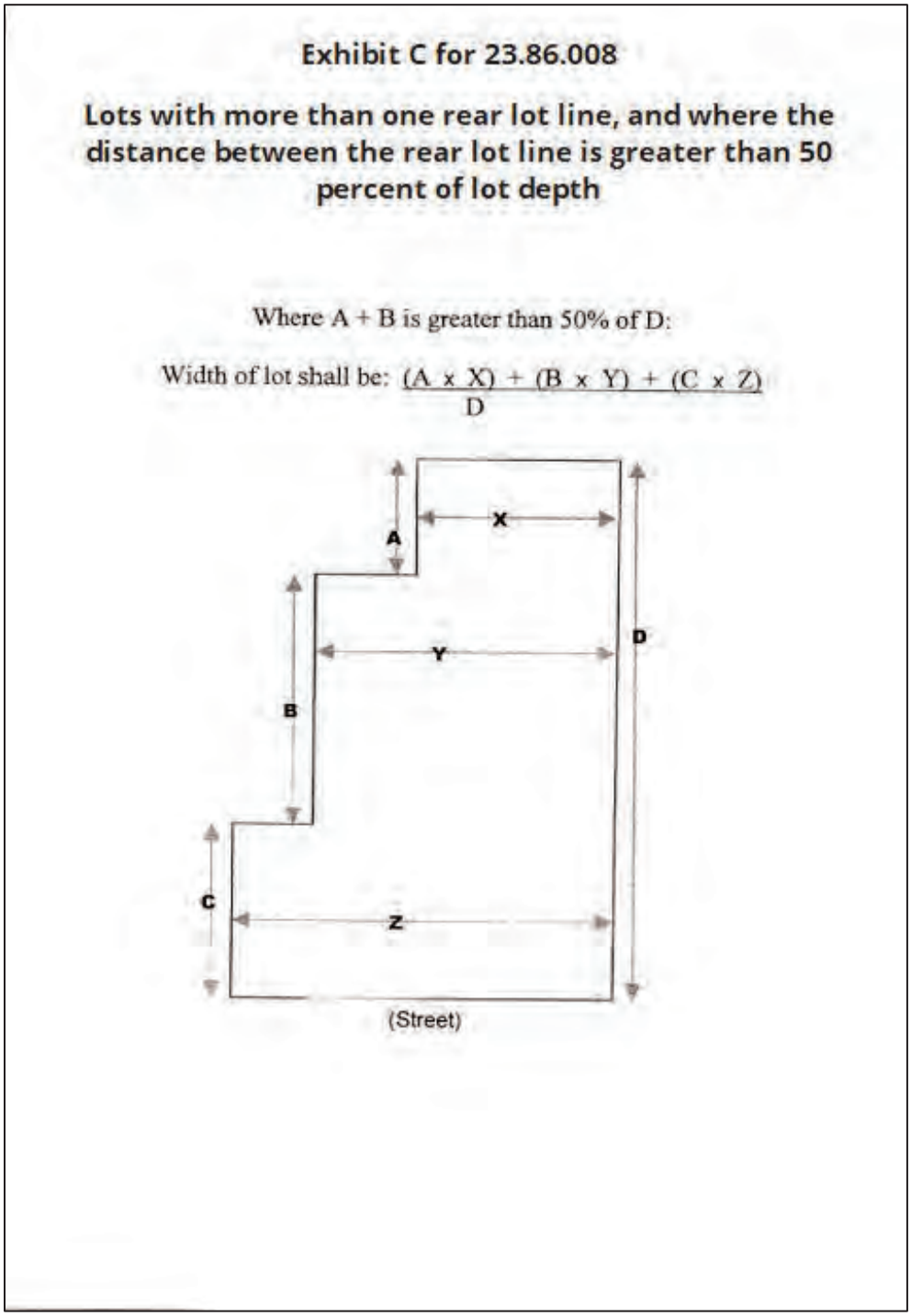


Exhibit C for 23.86.008

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

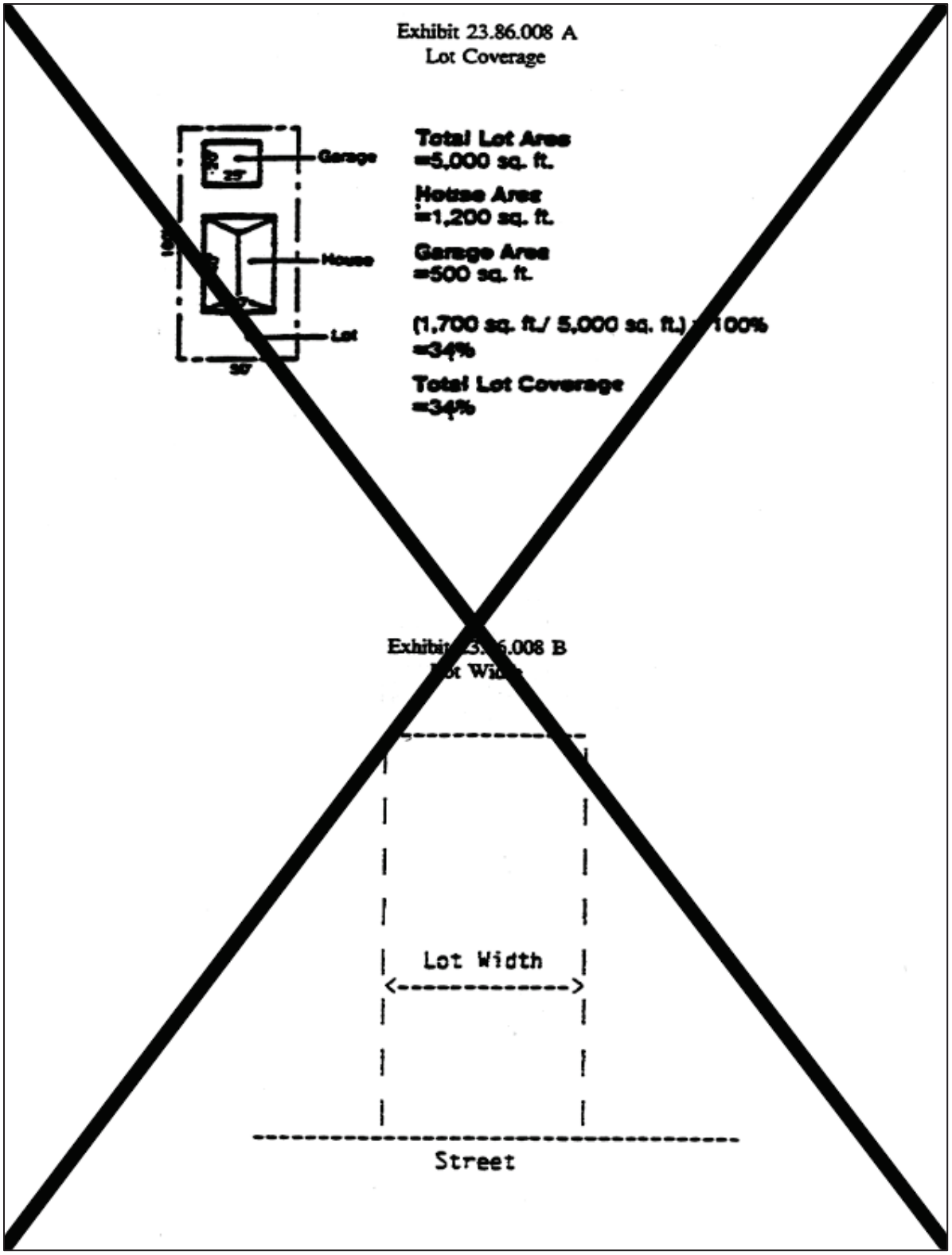


((~~a~~)) 1. If the distance between the rear lot lines is ((~~fifty (~~))50((~~)~~)) percent or less of the lot depth, the lot width shall be measured parallel to the front lot

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.



((~~Exhibits 23.86.008A, 23.86.008B~~))

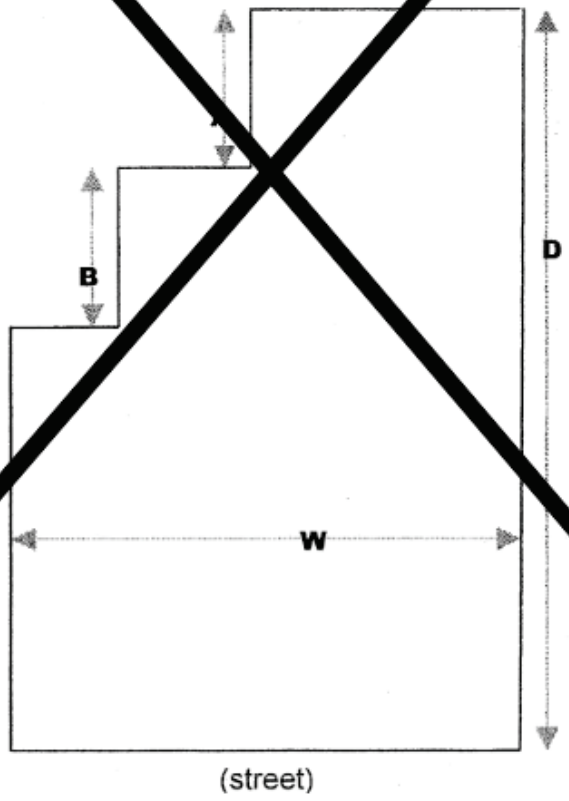
Exhibit 23.86.008 C

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

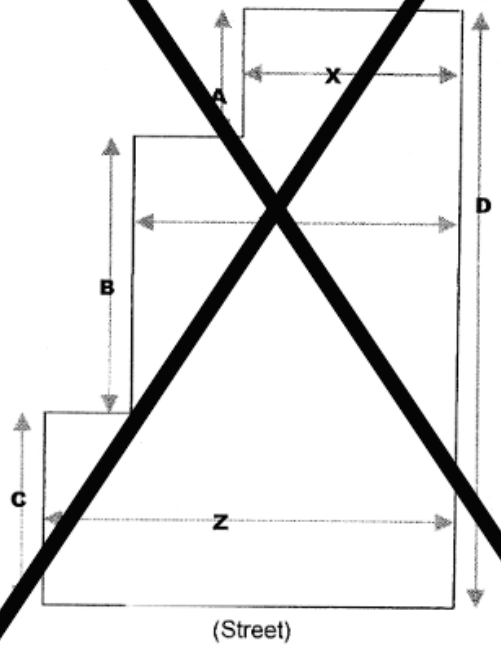
Lots with More Than One Rear Lot Line, And Where

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.~~

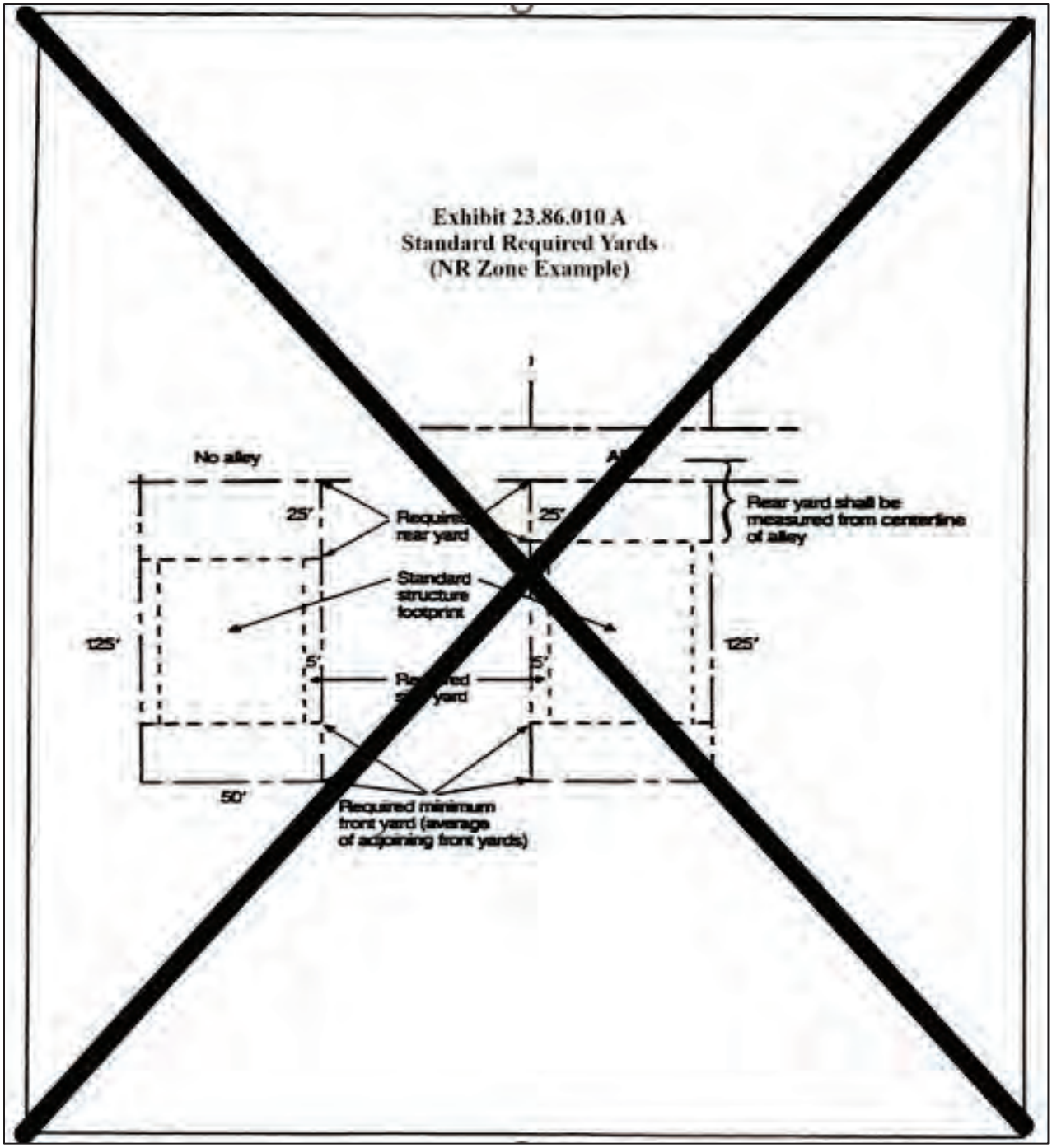
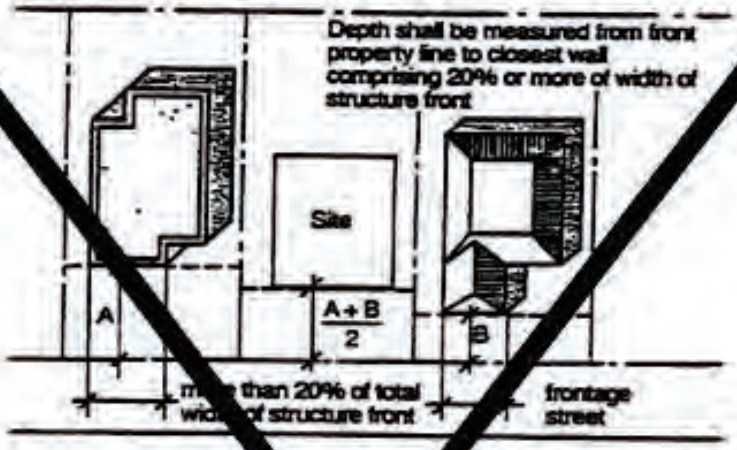
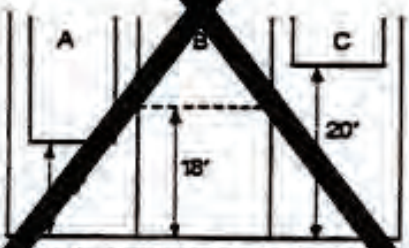

Exhibit 23.86.010 A
Standard Required Yards
(NR Zone Example)
No alley
25'
Required rear yard
25'
Rear yard shall be measured from centerline of alley
Standard structure footprint
125'
5'
5'
125'
50'
Required minimum front yard (average of adjoining front yards)

Exhibit B for 23.86.010

Determination of Front Yard Setback



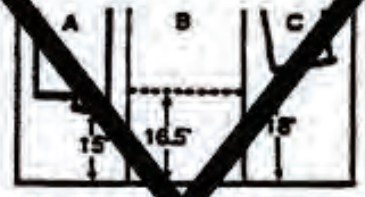


Required minimum front setback for Lot B determined as follows:

1. Front setback, Lot A = 16'.
2. Front setback, Lot C = 20'.
3. Average front setback = 18'.
4. Required minimum front setback for Lot B = 18'.

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 sid
5. Minimum required front yard.
   Lot C = (20 + 16)/2 = 18'.



Exhibit E for 23.86.010

Minimum Required Front Yards, Adjoining Lots Unimproved

1. Front yard, Lot F = 18'.
2. Lots B, C, D unimproved.
3. Use 20' for averaging purposes on west side.
4. Minimum required front yard,
   Lot E = (20 + 18)/2 = 19'.

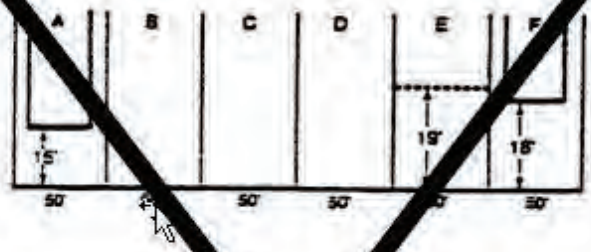
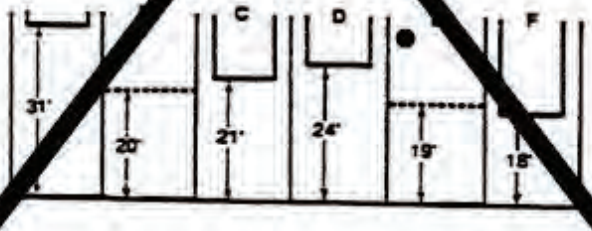


Exhibit F for 23.86.010

1. Minimum required front yard,
   Lot B = (20 + 20)/2 = 20'.
2. Minimum required front yard,
   Lot E = (20 + 18)/2 = 19'



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:

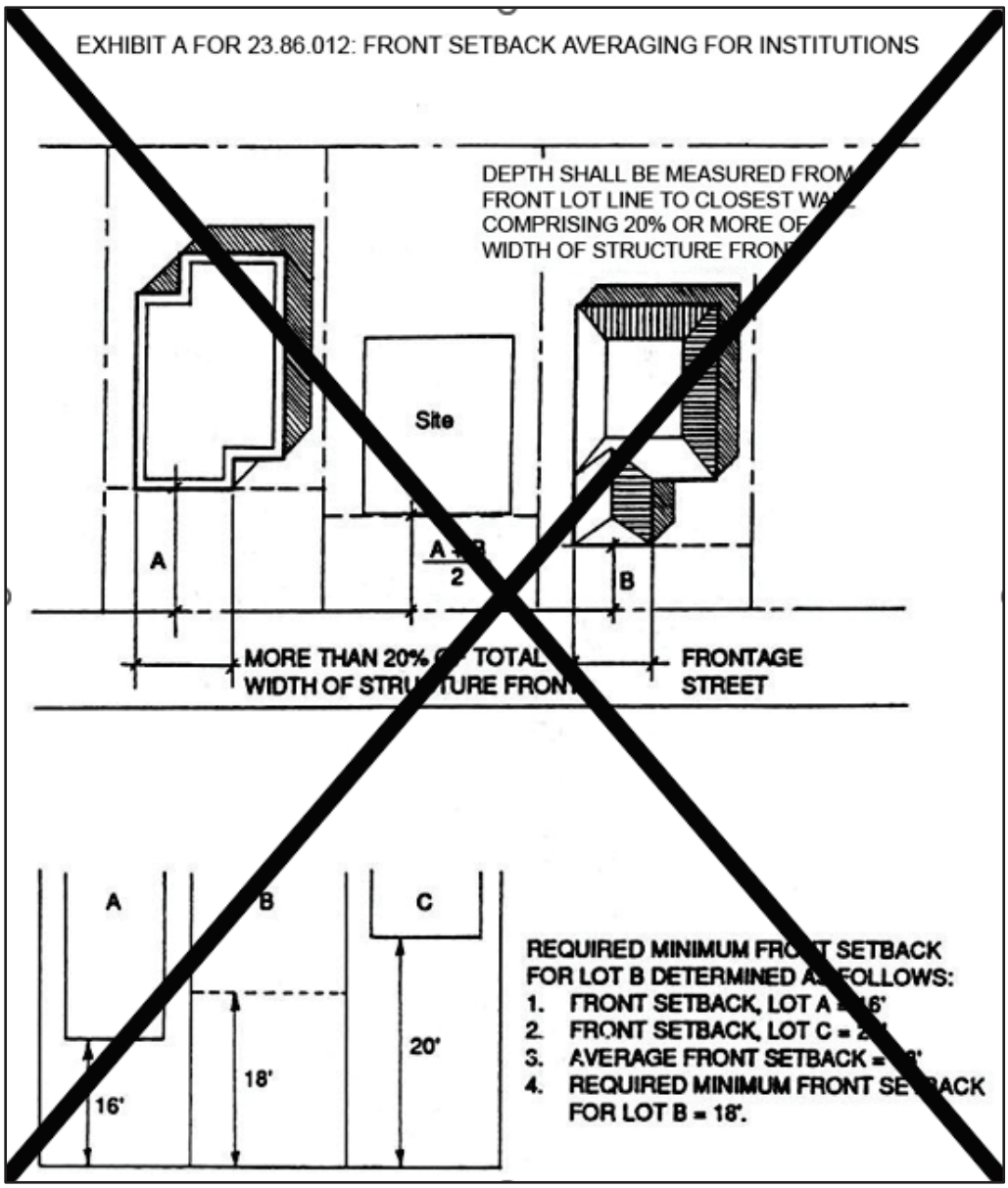
1. The average front and rear setbacks are calculated based on the entire width of the structure;

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~~)).

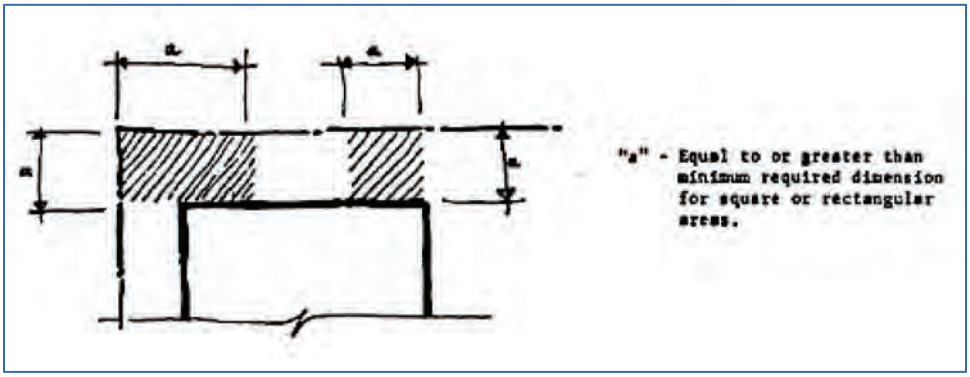
2. Pedestrian access areas shall not be considered to break the contiguity of amenity area on each side.

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:

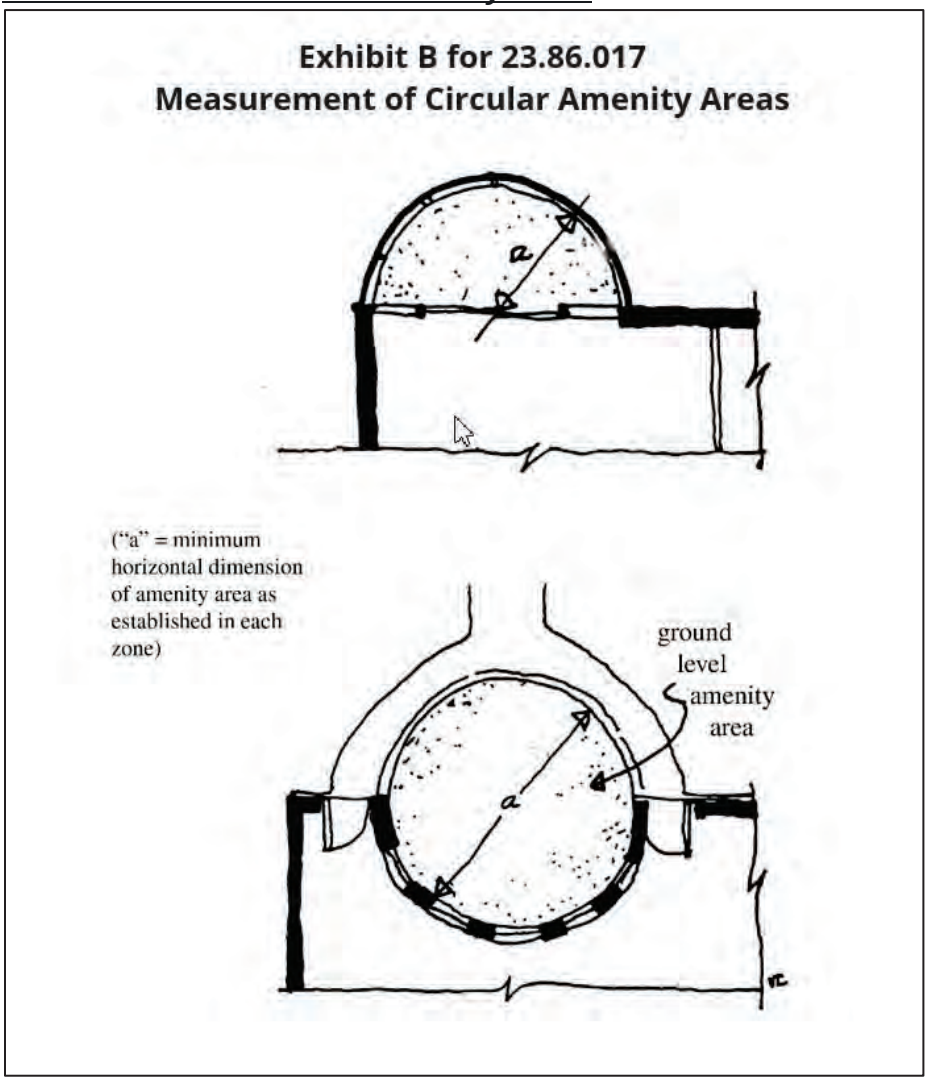
1. For rectangular or square areas, each exterior dimension of the area shall meet the minimum dimension (Exhibit A for 23.86.017).

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:

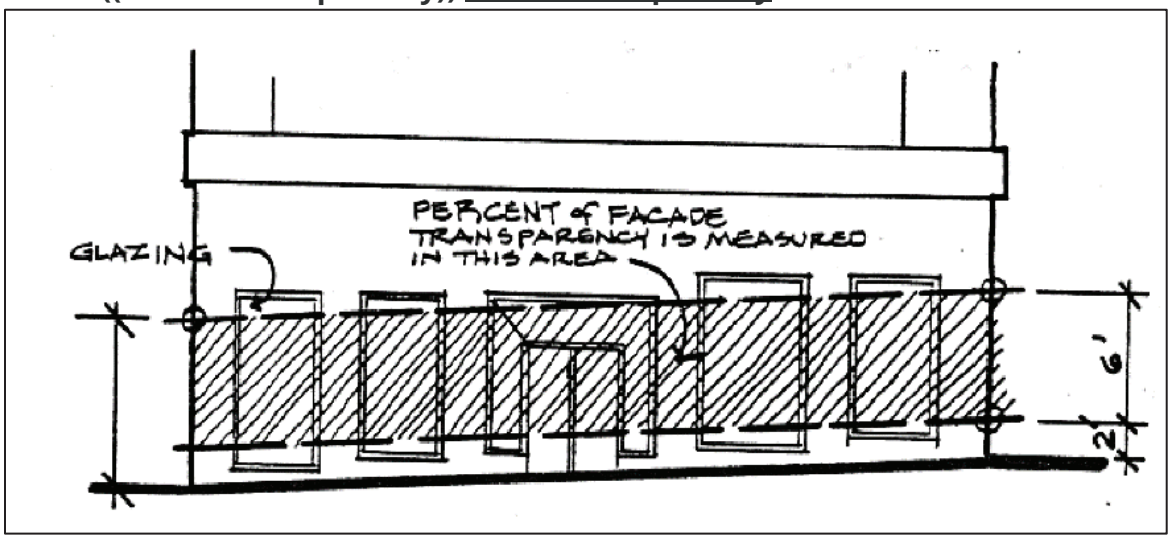
23.86.026 Facade transparency

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~~)) F. 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

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Letter 1

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. 1-1

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. 1-2

5. General Comment: The City of Seattle was platted 173 years ago in 1851, and its namesake is the respected leader siʔaɬ. However, the first ləliʔaʔkʷbixʷ (Non-Indigenous Colonizers) built this young village upon the ancient inter-Tribal trade, commercial, cultural, and governmental hub of the Northwest 1-3

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Coast, dᶻidᶻələ́lič. The connection the ʔaciɬtalbixʷ (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.KA., 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
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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
BFAA35FF98E048D...
Steven Moses, Director
Archaeology & Historic Preservation

CC:

Letter 2

To: Mayor Harrel; Seattle Office of Planning and Community Development
OneSeattleCompPlan@seattle.gov
CC: City Council Members
From: Representative Gerry Pollet, 46th District (Gerry.pollet@leg.wa.gov; 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.**

2-1

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).**

2-2

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.[1] 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 loser density with distance from the fixed transit and commercial center.[2]
- 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.[3]

  This meager increase is not the level of growth in housing units that my constituents and I believe is adequate or acceptable.

2-2 cont

- 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 /

---

[1] 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.

[2] 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 46th 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.

[3] 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 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). 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 130th 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.

2-6

- 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.[4]

- 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.*

[4] 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.[5] 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.

  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[6] and for approximately 20,000 units for households with incomes of 50-120% of AMI.[7]

- 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.[8] 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 thee 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

2-6 cont

[5] Housing Appendix at page 16
[6] Id.
[7] Draft Plan page 94.
[8] Housing Appendix footnote 12, page 15.

burdened but also contribute to shortages felt by households somewhat higher up the income ladder."[9]

- **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

[9] Housing Appendix page 16.

Mature trees in urban settings have been well documented to reduce stormwater runoff[10] 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,[1] 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.

2-7 cont

- **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[2] 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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[10] 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.[11]

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).[12] This is far more than deciduous trees.

2-7 cont

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.

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[13]:

> "Expand tree canopy and greenspace, especially in communities that experience disproportionate impacts of extreme heat and smoke events."

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[11] Draft EIS Vol 3 Page 3.3-3.
[12] 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.
[13] 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[14] refers only to City property and street tights 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.[15] 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.

[14] Plan at page 150.
[15] 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.

2-7 cont

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.[16] 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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[16] 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.

2-7 cont

Letter 3

From:	Pollet, Rep. Gerry
To:	PCD_OneSeattleCompPlan
Cc:	Moore, Cathy; Rivera, Maritza; Saka, Rob; Morales, Tammy; Hollingsworth, Joy; Strauss, Dan; rob.kettle@sattle.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.[1]

  This meager increase is not the level of growth in housing units that my constituents and I believe is adequate or acceptable.

3-1

- 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 /

3-2

- **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.

3-3

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
46th 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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[1] See Draft EIS Vol 3. 3 for an example of the summary of housing units for each alternative.

Letter 4

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.

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).

4-2 cont

- **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).

  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.

4-3

- **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).

  These demographic trends suggest that Seattle is failing to supply adequate housing for middle class households, and especially households with children.

4-4

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.

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.

4-4 cont

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.

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 18th, 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.

4- 5

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.

4- 6 cont

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

City of Seattle

Seattle Planning Commission

Letter 5

April 26 2024

Jim Holmes, Office of Planning and Community Development
via e-mail to: 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
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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.

5-2

- 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 130th/145th Street Station Area in this larger EIS adds confusion.

  The summary of potential impacts in the 130th Street and 145th 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: **5- 4**

  - 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.

  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.

5- 4 cont

- 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.

5- 5

- Study how each alternative may support or hinder the implementation of anti-displacement policies in the draft plan beyond just Mandatory Housing Affordability (MHA).

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. **5- 6**

  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.

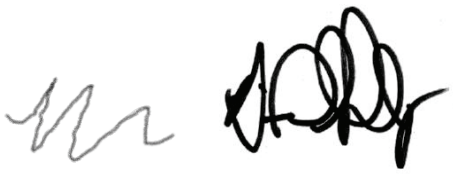
- Results of the impact analysis should be presented in terms that are accessible to lay audiences.

  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.

5- 6 cont

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 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.

Letter 6

STATE OF WASHINGTON
DEPARTMENT OF COMMERCE
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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

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!

6-1

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. 6-2

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).

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. 6-3

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).

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. **6-3 cont**

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. **6-4**

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.

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. 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

Letter 7

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

CAUTION: External Email

Hello,

Please see the attached comments.

Thank you,

JT

HOULIHAN LAW
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JOHN T. (J.T.) COOKE
ATTORNEY

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7-1

7-1

HOULIHAN LAW
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JOHN T. (J.T.) COOKE
ATTORNEY
JT@HOULIHAN-LAW.COM

May 7, 2024

VIA Email: OneSeattleCompPlan@seattle.gov; 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. 7-1 cont

The problem with the incremental (or step-up) approach to accommodating population growth over 20-yar 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 7-2

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properties on the periphery of the existing boundary of the Fremon 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.

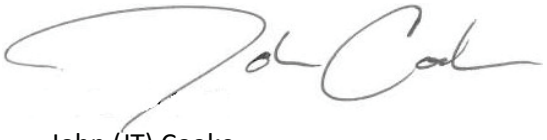
7-2 cont

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)

Letter 8

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. 8-1

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[1] will be created in Seattle over the next two decades, which is far less than the 175,000[2] 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.[3] 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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[1] 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.

[2] Draft Plan at 4.

[3] 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.

8-3 cont

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.[4] 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.

8-4

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 <u>baseline</u> 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.[5] 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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[4] *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").

[5] *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.

8-4 cont

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 polices 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."[6] 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 certainly 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

[6] 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.

8- 5
Cont

Thank you for taking the time to consider these comments.

Sincerely,

Ada Healey, Chief Real Estate Officer

Letter 9

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

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
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9-1

From: Jack McCullough
Sent: Monday, May 6, 2024 7:24 AM
To: PCD_CompPlan_EIS@seattle.gov
Cc: OneSeattleCompPlan@seattle.gov
Subject: Comment letter

Please see the attached comment letter.

Thanks.

Jack

John C. McCullough
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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

9-1 cont

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.

9-1 cont

Letter 10

HOLLAND
PARTNER GROUP

May 6, 2024

Jim Holmes, Strategic Advisor
Office of Planning & Community Development
P.O. Box 94788
Seattle, WA 98124

Via email (*OneSeattleCompPlan@seattle.gov*; *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. 10-1

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

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.

10-1 cont

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.

10-1 cont

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.

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.

10-2

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

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.

10-2 cont

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

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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.

10-4 cont

Thank you for the opportunity to comment.

Sincerely,



Raymond Connell
Managing Director, Holland Partner Group

1000 Dexter Avenue N, Suite 201 | Seattle, WA 98109 | p 206.438.1371| f 206-832-3509

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.[1] 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. 11-1

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").

[1] 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.

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.[2] 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.*[3]

- *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

[2] *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").

[3] *See* https://www.sandiego.gov/development-services/news-programs/life-science-industry-pilot-program

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. 11-2 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 11-3

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

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.

11-3 cont

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

Letter 12



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
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. 12-1

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.

12-3 cont

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@samapraxis.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

Letter 13

Futurewise c/o WeWork
1201 3rd Ave #2200, Seattle, WA 98101
(206) 343-0681
futurewise.org

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
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, 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

Document	Comment
Draft Plan	**Ensure Adequate Public Services and Facilities for Seattle's Growth Targets** The Draft Plan and DEIS identifies the following growth targets 2024-2044 period: 80,000 housing units and 159,000 jobs.[1] However, Seattle is assigned net housing and job targets of 112,000 housing units and 169,000 jobs between 2019-2044.[2] 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.[3] 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. 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."

13-1 cont

[1] See City of Seattle. "One Seattle Plan—Draft for Public Review," p. 16, March 2024.
[2] See King County. "2021 King County Countywide Planning Policies," Table DP-1: King County Jurisdiction Growth Targets 2019-2044 ,p. 23, March 2023
[3] 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.[4] 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.[5] 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".[6]

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.

[4] See *Ibid.*, p. 45.
[5] See *Ibid.*, p. 45.
[6] 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.[7]

13-2 cont

This finding is supported by peer-reviewed science.[8] 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."[9] 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

[7] 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-displacement-strategy/
[8] See Bronin, Sara C. "Zoning by a Thousand Cuts." *Pepperdine Law Review* 50 (2023): 719-784.
[9] 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.[10] The City acknowledges that practices of racial exclusion and discrimination have resulted in lasting segregation across Seattle[11] and that low-density zoning is "perpetuating patterns of racial and economic exclusion and contributing to market pressures that cause displacement and gentrification."[12] 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."[13]

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[14], and another that assessed minimum lot size regulations in Massachusetts[15]. Applying such a method to

[10] 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
[11] City of Seattle. "One Seattle Plan—Draft for Public Review," p. 91, March 2024.
[12] *Ibid.* p. 15
[13] *Ibid.* p. 17
[14] 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
[15] 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. [16]

13-3 cont

> 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.

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."[17] 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."[18]

13-4

The Draft Plan growth strategy proposes to address racial disparities with the following two changes: concentrating Neighborhood Centers in

[16] 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.
[17] See RCW 36.70a.070(2)(f)
[18] 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.[19] 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.

13-4 cont

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

[19] 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.[20] 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

13-5

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.

To better show how the city is complying with these requirements the city should:

> Expand the missing middle affordable housing incentive program to the

[20] 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.[21] 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."[22] VISION 2050 identifies the 130th Street and 145 Street light rail stations as a high-capacity transit station areas[23], a term that it explicitly defines as an area "within ½ a mile of existing or planned light rail".[24]

13-6

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.

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,

[21] See Puget Sound Regional Council. "VISION 2050", MPP-RGS-8, p. 31, October, 2020.
[22] *Ibid.*, MPP-RGS-8, p. 43, October, 2020.
[23] *Ibid.*, p. 72
[24] *Ibid.* p. 128

it is inequitable to concentrate employment opportunities in the central and northern parts of the city.[25] 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[26], 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[27], the City has the ability to adjust the planned density in this comprehensive plan update.[28]

The City should:

13-6 cont

> 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.

Draft Plan, DEIS

Amend Alternative 5 and Replace the Draft Plan Growth Strategy with the Amended Version

13-7

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

[25] 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
[26] See King County. "2021 King County Countywide Planning Policies," Appendix 6: King County Centers Designation Framework, pp. 106-111, March 2023
[27] 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.
[28] 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[29], the lowest ratio of physical displacements to affordable housing units built, the greatest reduction to economic displacement pressure[30], the greatest benefit for low-income renter households[31], the lowest greenhouse gas emissions per capita[32], and the lowest vehicle-miles traveled ("VMT") per capita[33]. 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

Document	Comment
Draft Plan	**Prioritize Carbon-Neutral Transportation Modes** 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

[29] 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
[30] *Ibid.* p. 3.8-54
[31] *Ibid.* p. 3.8-61
[32] *Ibid.* p. 3.2-23
[33] *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

Document	Comment
Draft Plan, Draft Housing Appendix	**Revise the Regulatory Barrier Analysis, Follow Department of Commerce Guidance** 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.[34] The Draft Housing Appendix identifies only three regulatory barriers to housing production: zoning, development standards, and permitting times.

13-9

[34] 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[35] affect housing production and what actions may be needed to address each barrier.

13-9 cont

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.

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[36], 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

[35] 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.
[36] 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/1d9d5l7g509r389f0mjpowh8isjpirlh

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 completing 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.[37] 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.[38] 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

[37] 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-displacement-strategy/; also see Attachment D: Draft Anti-Displacement Framework August 2023
[38] 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

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

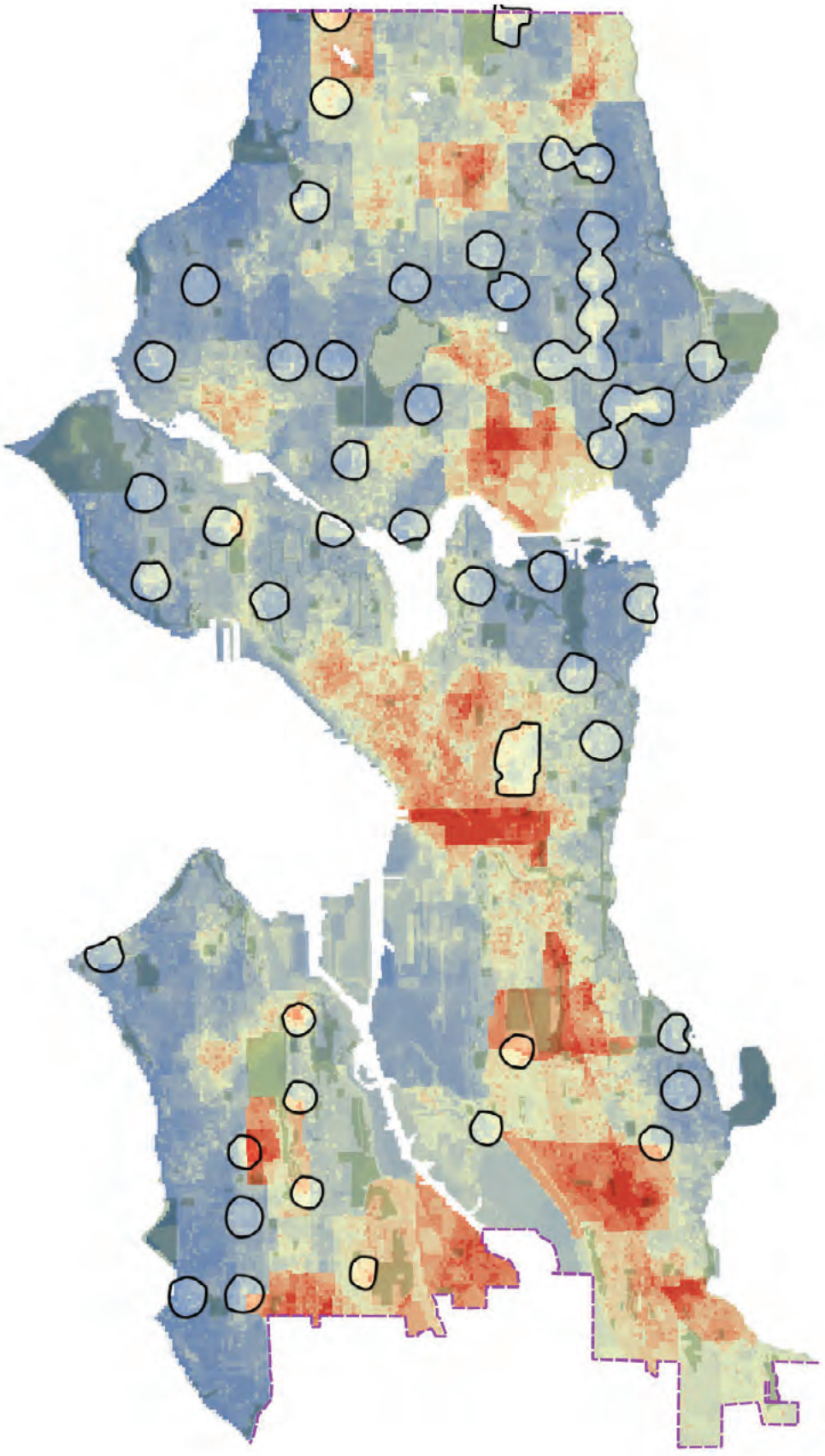
Attachment C. Displacement Risk Index with Corridors from August 2023 Draft Plan

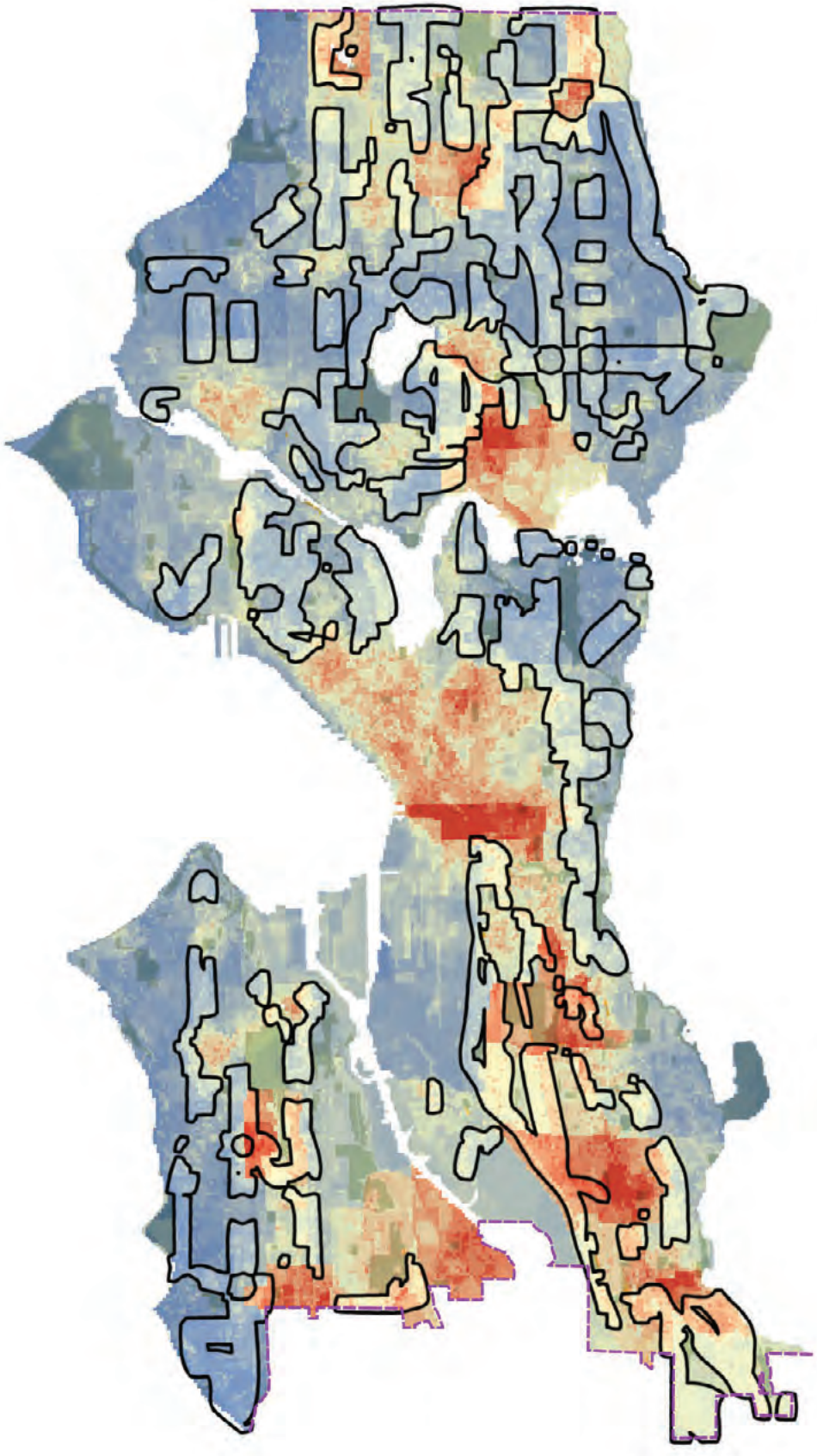
Attachment D. Draft Anti-Displacement Framework August 2023

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





The Futurewise requests the City of Seattle to include the following document in the public record:

City of Seattle. “Draft Anti-Displacement Framewprl”, August 2023. Accessible for download at: https://futurewiseorg.sharepoint.com/:b:/g/EYp7Go9C-pZDmqO27INDoQwBvGtOWpWD-mql_FfcP_eyRuQ?e=CWxkMB

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.
Regional Centers[1]					
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[2]	131.3	161.3	391	53,723	137.2
Northgate	57.3	75.1	412	30,803	74.7
Ballard[2]	67.7	96.9	495	50,047	101.0
Hub Urban Centers[1]					
Bitter Lake Village	44.0	55.4	364	20,044	55.1
Fremont	72.9	88.1	214	18,877	88.0
Lake City	57.6	75.4	142	10,688	75.1
Mt Baker	36.0	47.4	491	23,135	47.1
West Seattle Junction[2]	70.4	100.2	449	26,934	59.9
Residential Urban Centers[1]					
130th Street[2]	18.4	20.7	218	7,733	35.5
23rd & Union-Jackson	38.9	46.5	625	29,046	46.5
Admiral[2]	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	25.8	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[2]	84.3	101.6	315	9,579	30.4
Madison-Miller	65.3	85.1	145	12,349	85.0
Morgan Junction[2]	34.1	41.6	281	7,169	25.5
North Beacon Hill	28.1	34.3	267	9,161	34.3
Othello[2]	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[2]	89.5	110.5	329	5,857	17.8
Wallingford	42.2	51.3	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.

	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
PART 3: CENTER CRITERIA			
A. Purpose			
1. Compatibility with VISION centers concept, Regional Growth Strategy and Multicounty Planning Policies	Yes	Yes	Yes
B. Activity level/Zoning [20]			
1. existing activity [21]	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 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 CPPs 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.

Letter 14

NAIOP
COMMERCIAL REAL ESTATE DEVELOPMENT ASSOCIATION
WASHINGTON STATE CHAPTER

May 6, 2024

VIA EMAIL

Rico Quirindongo, Director
Jim Holmes, Strategic Advisor
Office of Planning and Community Development
600 4th Ave, 5th Floor
Seattle, WA 98104
Email: OneSeattleCompPlan@seattle.gov, 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. 14-1

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.

14-1 cont

- 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.

14-1 cont

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

Letter 15

BELLWETHER HOUSING

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
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.

15-1

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

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,



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

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

Sightline INSTITUTE

Dan Bertolet | Director, Housing & Urbanism Program | he/him

Sightline Institute | www.sightline.org |

I live and work on the traditional lands of the Coast Salish peoples, including the dxʷdəwʔabš (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.

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.

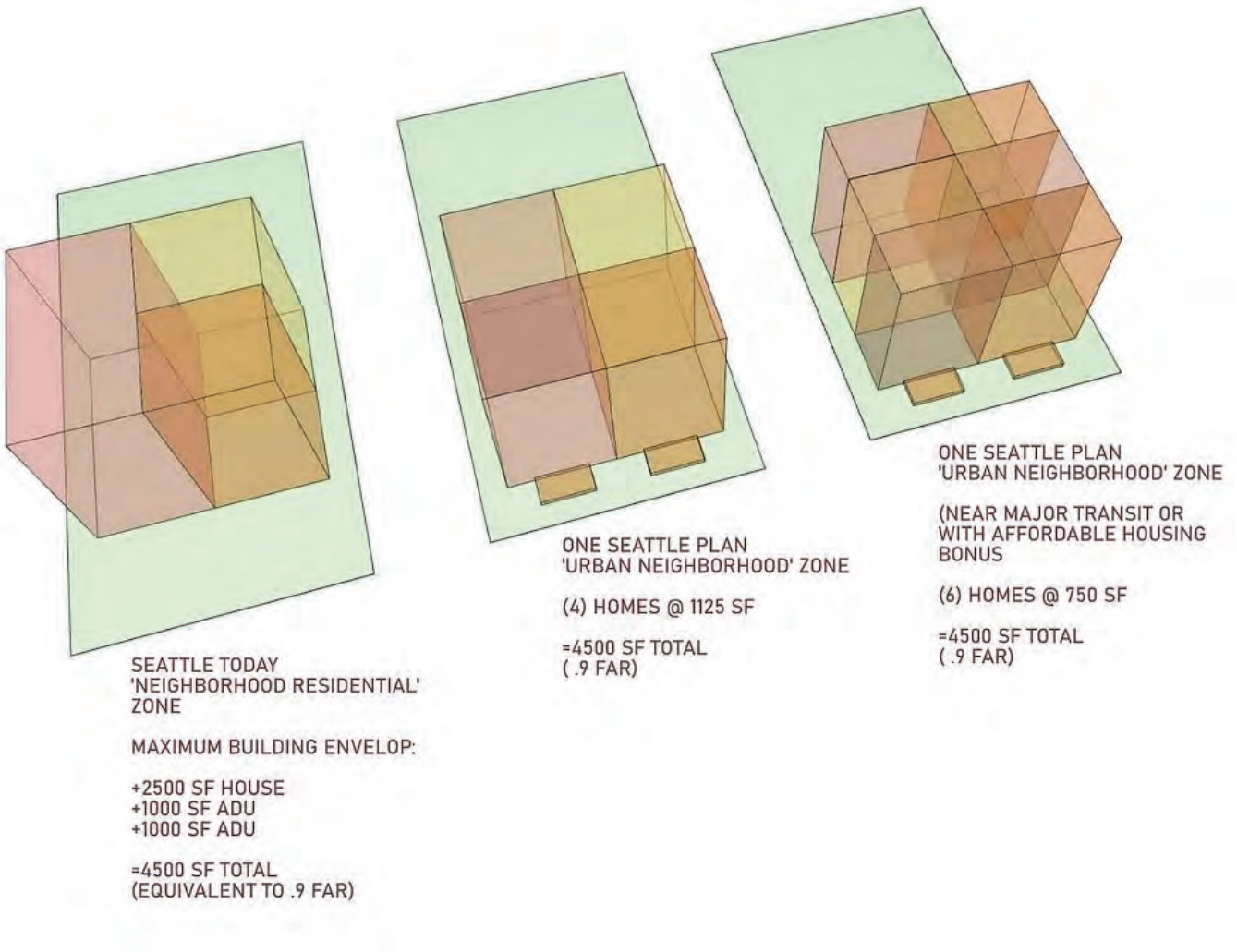
The earliest example is Minneapolis' 2019 legalization of triplexes, where only a handful have been built because the zoning caps their size at the same as standalone houses. Analysis of Portland's middle housing zoning showed that its incremental increases in capacity for more homes was still not enough 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.

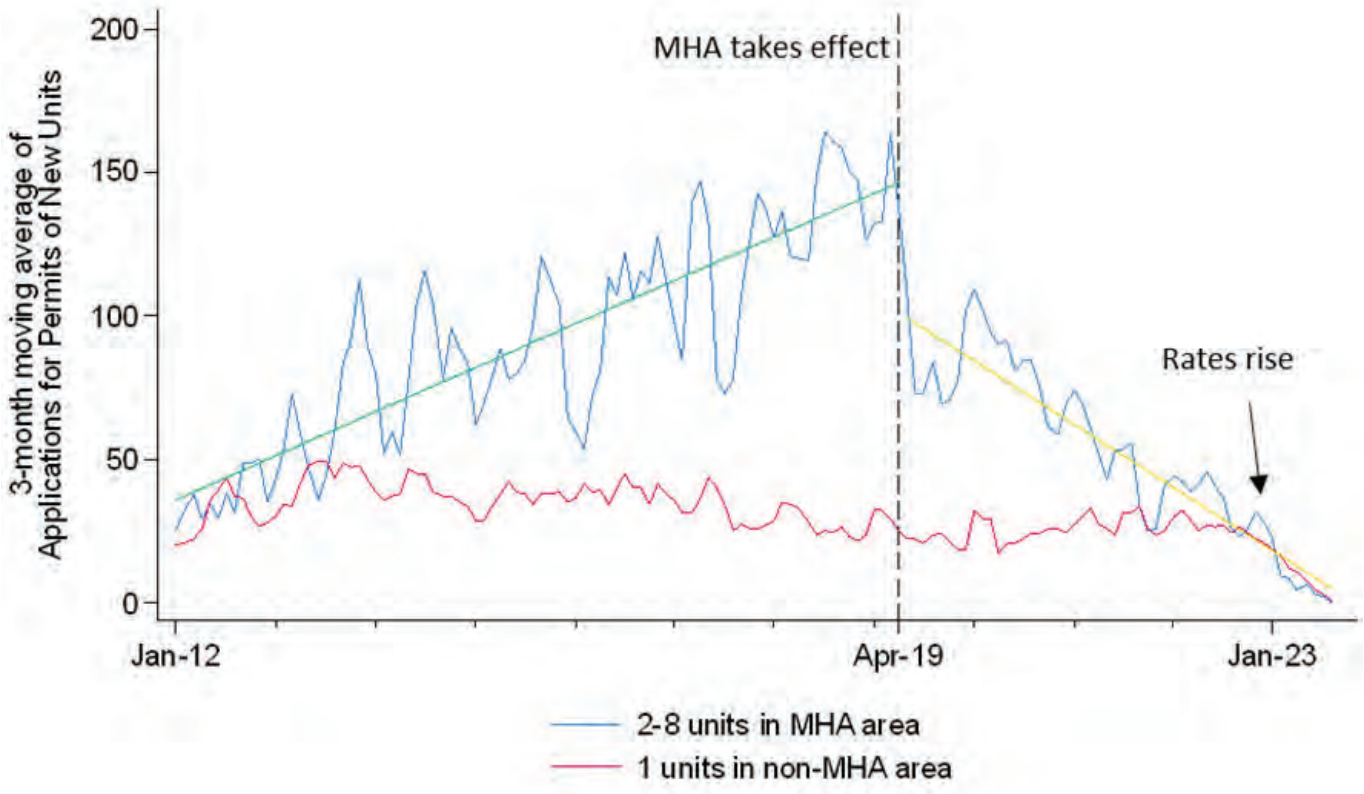
If Seattle hopes to see much stacked-flat middle housing construction, it will need to give it a leg up to overcome the inherent economics that favor townhouse development. Two good ways to do that:

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.

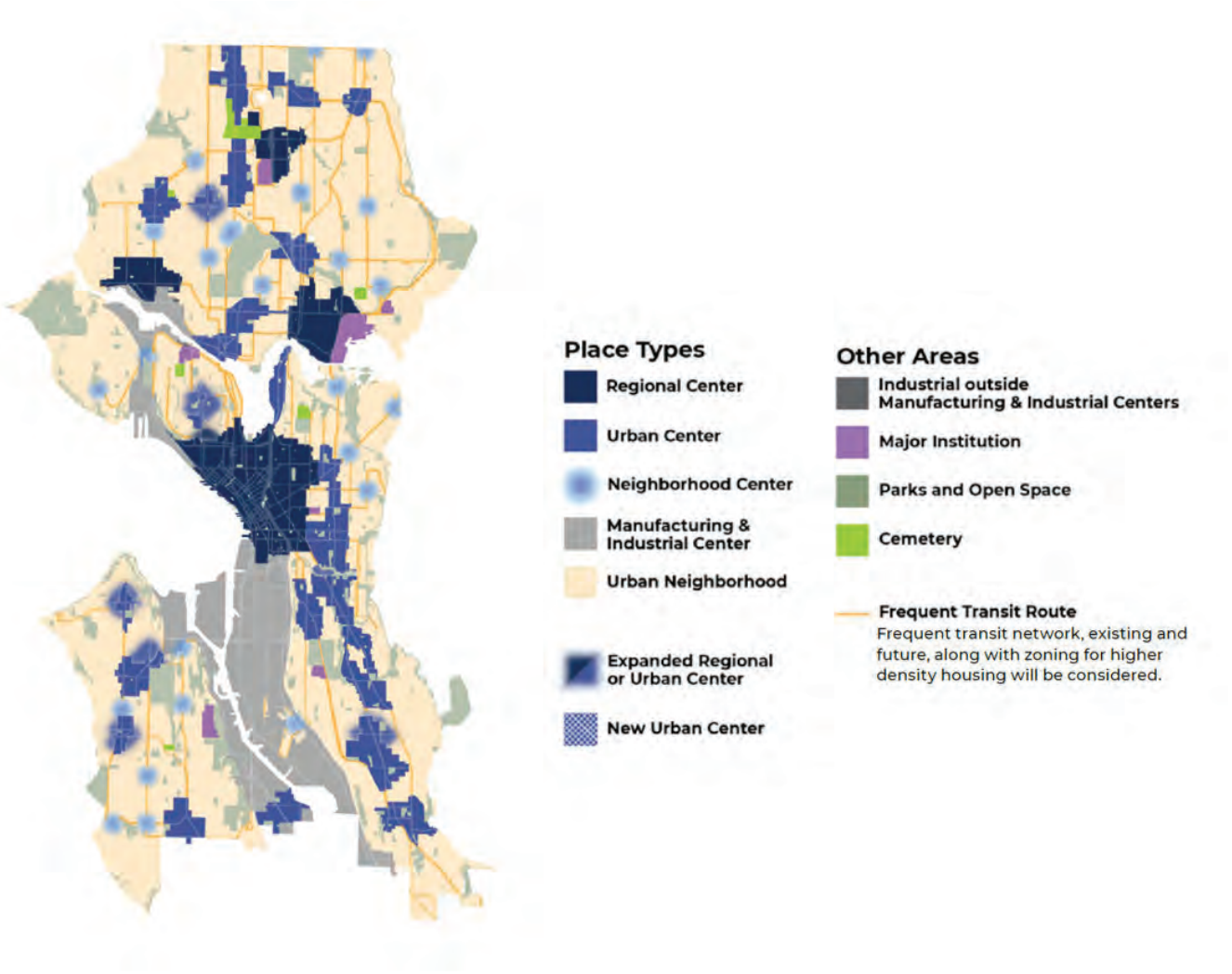
CREATE APARTMENT BUILDING ABUNDANCE

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

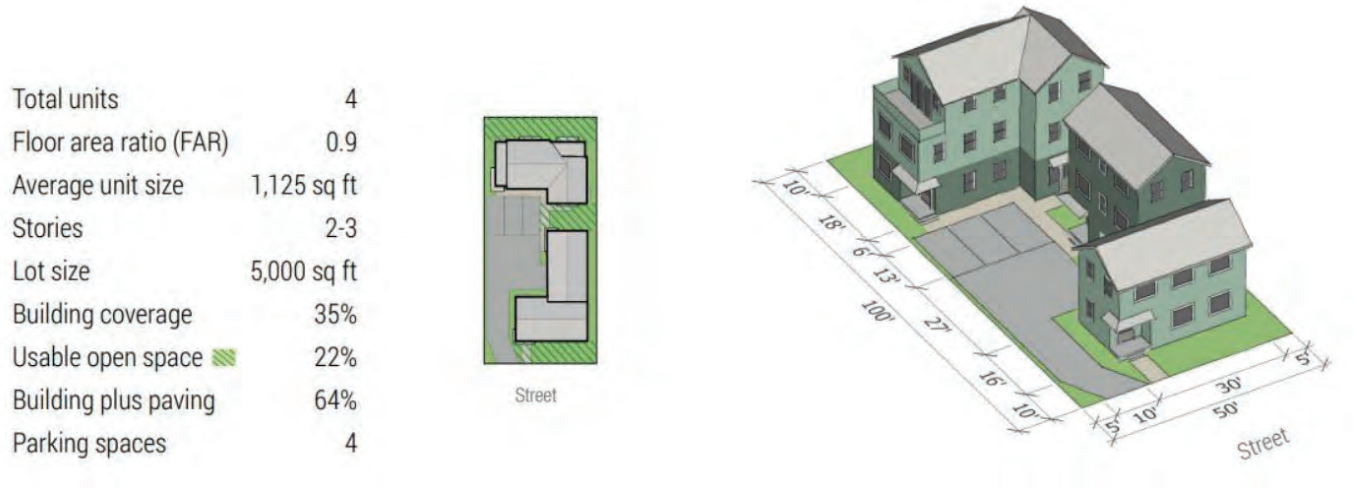
Portland, Oregon, is poised to lead the US in allowing more apartments, the next logical step after that city's 2020 legalization of middle housing citywide. An advocate-led effort proposes legalizing midrise apartment buildings throughout the city's Inner Eastside neighborhoods.

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.



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."

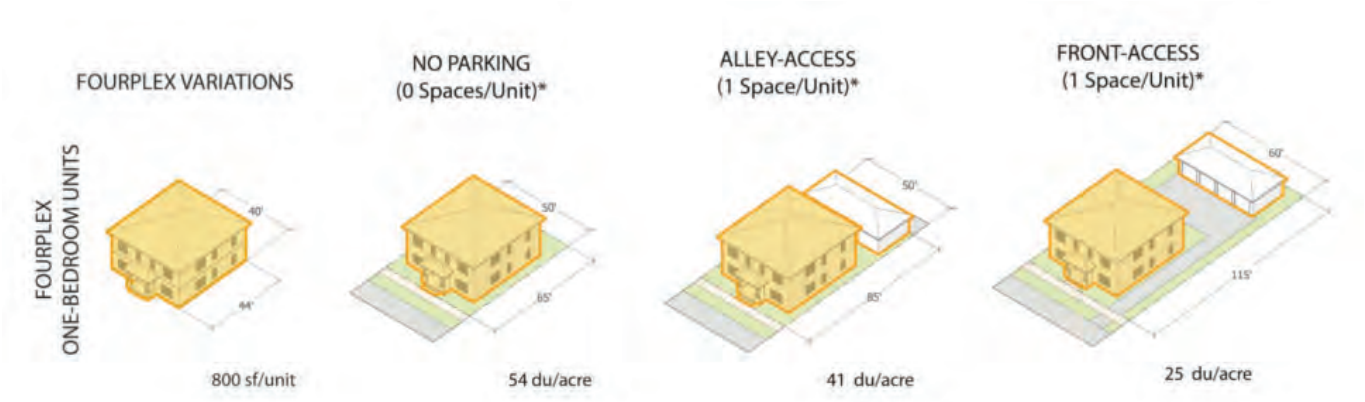
Meanwhile, the only benefits of off-street mandates offered by Seattle's draft plan are that they can "reduce competition for parking on the street" and "support goals like providing space for electric vehicle charging."

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

Letter 17

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

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
Director of Preservation Services
Historic Seattle
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eugeniaw@historicseattle.org | www.historicseattle.org

Letter 18

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
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:

18-1

COMPLETE COMMUNITIES COALITION

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



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).[1,2] 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.

18-1 cont

- 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 theDraft 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 mediam income ("AMI") band,

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[1] 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/

[2] 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.[3]

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[4], 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.

18-2

To facilitate iImmediate 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.

[3] See City of Seattle. "Draft Housing Appendix", p.122. https://www.seattle.gov/documents/Departments/OPCD/SeattlePlan/OneSeattlePlanDraftHousingAppendix.pdf

[4] 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.[5]

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

[5] 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.[6]

- 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.

18-3 cont

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.

18-4

To facilitate immediate progress, the Mayor's Recommended Plan and any Preferred Alternative should:

[6] 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

- 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.

18-4 cont

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.

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.

18-5

- 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.

18-5 cont

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.[7]
- 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.[8]
- 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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[7] 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."

[8] 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:

18-7 cont

- 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.[9] 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."[10] 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

[9] See Attachment C: Urban Neighborhood Areas Overlayed by FLUM 2035 Multi-Family Residential Areas for a graphic depiction of the multifamily housing mapping error.
[10] *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.[11] 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.

18-9 cont

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.

[11] 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:

18-9 cont

- 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. 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:

18-10

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.

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) and Jesse Simpson (jesse@housingconsortium.org).

Sincerely,

18-10 cont



Tiernan Martin and Jesse Simpson
Co-Chairs, Complete Communities Coalition Steering Committee

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 Overlayed 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_mzhgGw9CgVMoSvvajtwB1eTJkbe2RZ7UPQ-01Py57g?e=keR-Huq

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.
Regional Centers[1]					
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[2]	113.3	181.3	391	53,723	137.2
Northgate	57.3	75.1	412	30,803	74.7
Ballard[2]	67.7	96.9	495	50,047	101.0
Hub Urban Centers[1]					
Bitter Lake Village	44.0	55.4	364	20,044	55.1
Fremont	72.9	98.1	214	18,877	88.0
Lake City	57.6	75.4	142	10,688	75.1
Mt Baker	36.8	47.4	491	23,135	47.1
West Seattle Junction[2]	70.4	100.2	449	26,934	59.9
Residential Urban Centers[1]					
130th Street[2]	18.4	20.7	218	7,733	35.5
23rd & Union-Jackson	38.9	46.5	625	29,046	46.5
Admiral[2]	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	25.8	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[2]	84.3	101.6	315	9,579	30.4
Madison-Miller	65.8	85.1	145	12,349	85.0
Morgan Junction[2]	34.1	41.6	281	7,169	25.5
North Beacon Hill	28.1	34.3	267	9,161	34.3
Othello[2]	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[2]	89.5	110.5	329	5,857	17.8
Wallingford	42.2	51.3	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.

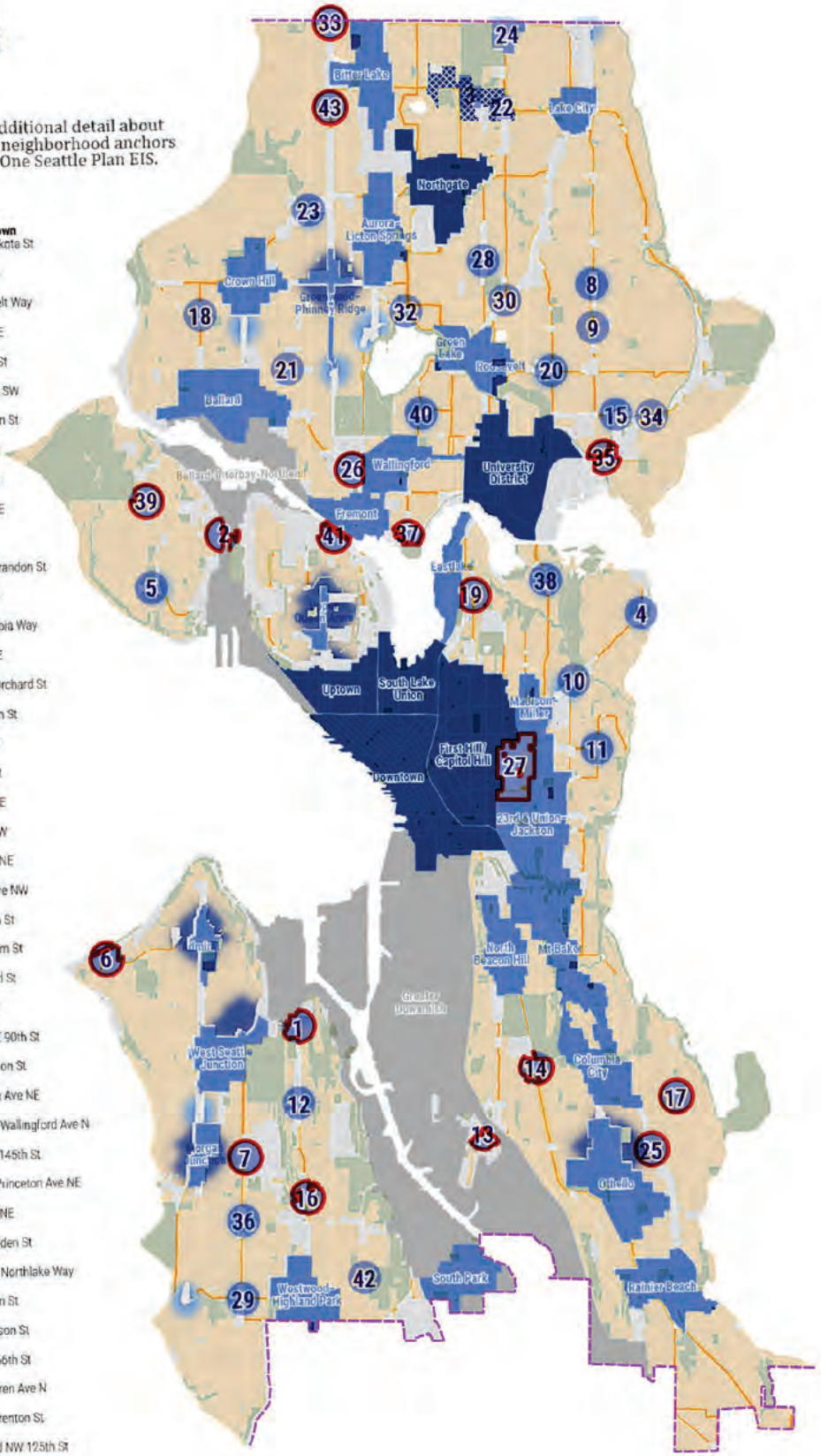
	Metro Growth Centers	Urban Growth Centers	Countywide Growth Centers
3. freight access	Yes	To be addressed in subarea plan	To be addressed in subarea plan
PART 3: CENTER CRITERIA			
A. Purpose			
1. Compatibility with VISION centers concept, Regional Growth Strategy and Multicounty Planning Policies	Yes	Yes	Yes
B. Activity level/Zoning [20]			
1. existing activity [21]	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 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 CPPs 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.

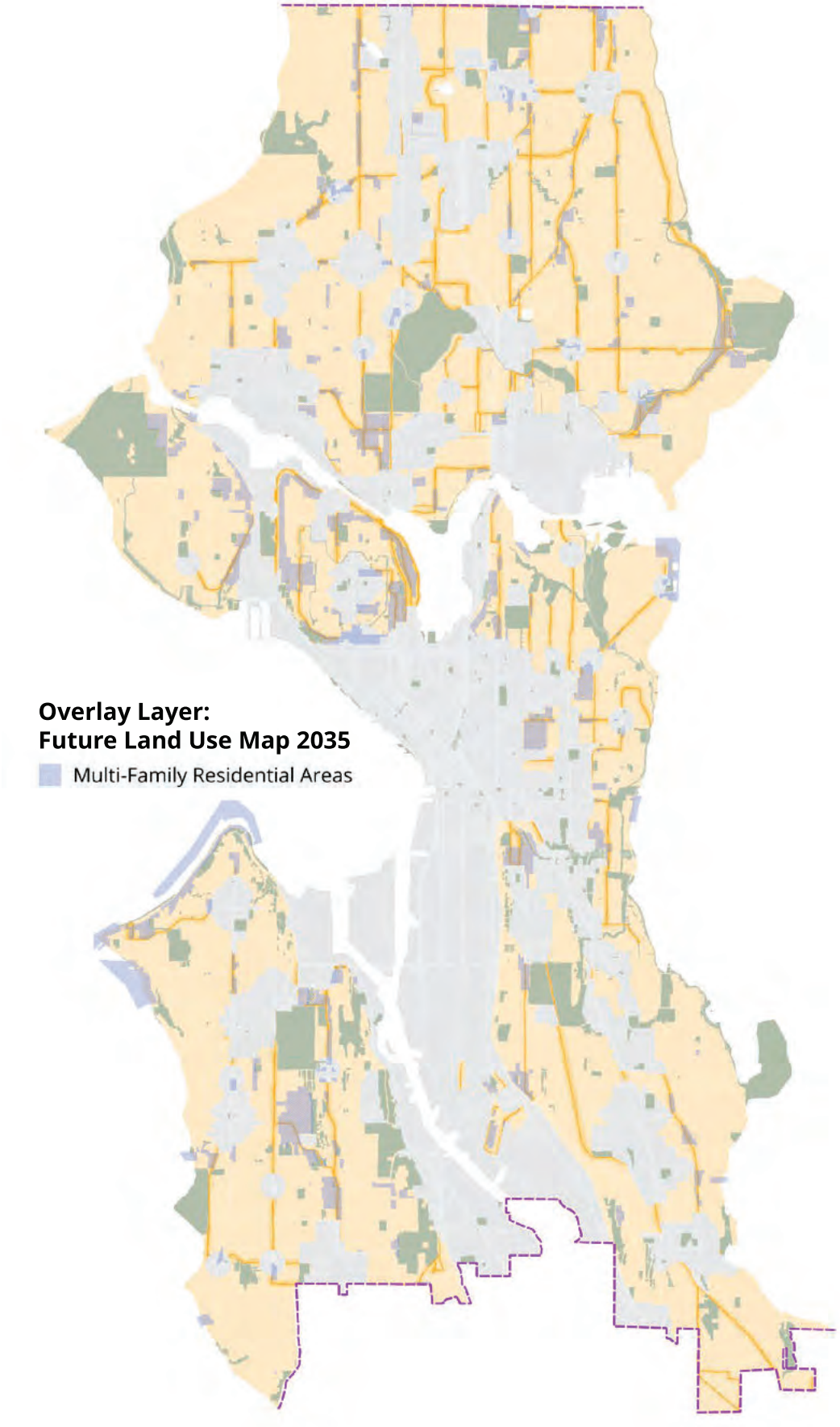
Alternative 2
Focused

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 **Roanoke 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

Complete Communities Coalition Comments on the Draft One Seattle Plan and Draft Environmental Impact Statement
Attachment D: Urban Neighborhood Areas Overlayed by FLUM 2035 Multi-Family Residential Areas



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. 19-1

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	https://data-seattlecitygis.opendata.arcgis.com/datasets/SeattleCityGIS::environmental-justice-priority-areas/about	Jan 26, 2024
Tree_Canopy_2021_Seattle	https://data-seattlecitygis.opendata.arcgis.com/datasets/SeattleCityGIS::seattle-tree-canopy-2021/about	Jan 26, 2024
Zoned Development Capacity by Development Site Current	https://data-seattlecitygis.opendata.arcgis.com/datasets/SeattleCityGIS::zoned-development-capacity-by-development-site-current/about	Jan 27, 2024
Unofficial neighborhood boundaries	https://www.arcgis.com/home/item.html?id=8adffd6b8fba4a84966fa7471afd0d6c	Nov 29, 2023

19-1 cont

Defining and mapping development-threatened tree canopy procedure:

1. 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"
2. Add new field to "Development Threatened Tree Canopy 2021 in EJ Priority Areas" called "DTTC_Acres" (double).
3. Calculate geometry of DTTC_Acres
   Property = Area (geodesic)
   Area Unit = Acres
   Coordinate system = default
4. Intersect Development Threatened Tree Canopy 2021 in EJ Priority Areas with Neighborhoods layer. Call it DTTC_Neighborhoods_Intersect
5. Add new field to "DTTC_Neighborhoods_Intersect" called "DTTC_Hood_Acres" (double).
6. 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

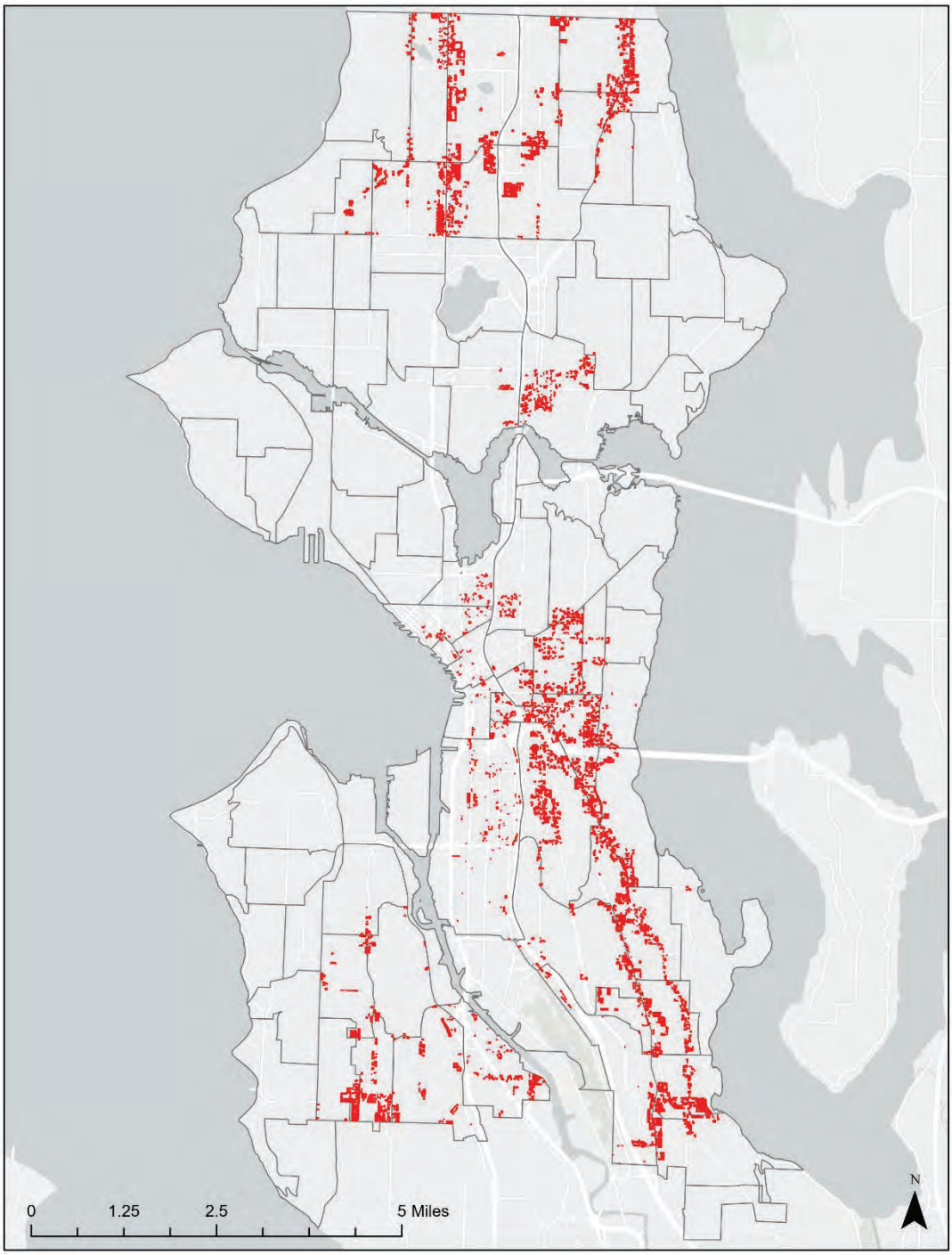
19-1 cont

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

19-1 cont

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
TOTAL	**211.65**	**206.66**	**216.63**

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
TOTAL	211.65	206.66	216.63

19-1 cont

Letter 20

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

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

20-1



8050 35th Ave NE Seattle, WA 98115 | 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.

BIRDS CONNECT SEATTLE

May 6, 2024

Office of Planning and Community Development
Seattle City Hall
600 4th Ave
Seattle, WA 98104
Submitted via email to OneSeattleCompPlan@seattle.gov & 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)

20-1

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.**

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. 20-2

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.

20-2 cont

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.

20-2 cont

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

20-3

- **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."

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).

20-4

- **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,

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.

20-4 cont

- 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 County 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.

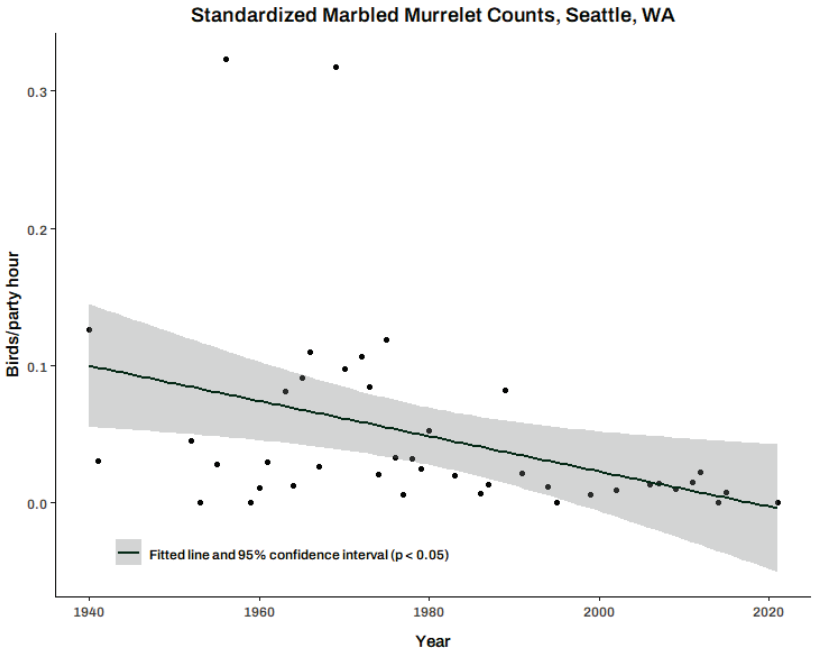


Figure 2: Number of Marbled Murrelets counted each winter in Seattle, Washington, as part of the National Audubon Society's Christmas Bird Count. Counts are standardized by observer effort, which varies annually, by dividing the total number of birds counted by total observation time (party hours). Christmas 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.

20-6 cont

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 Rosenburg 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.

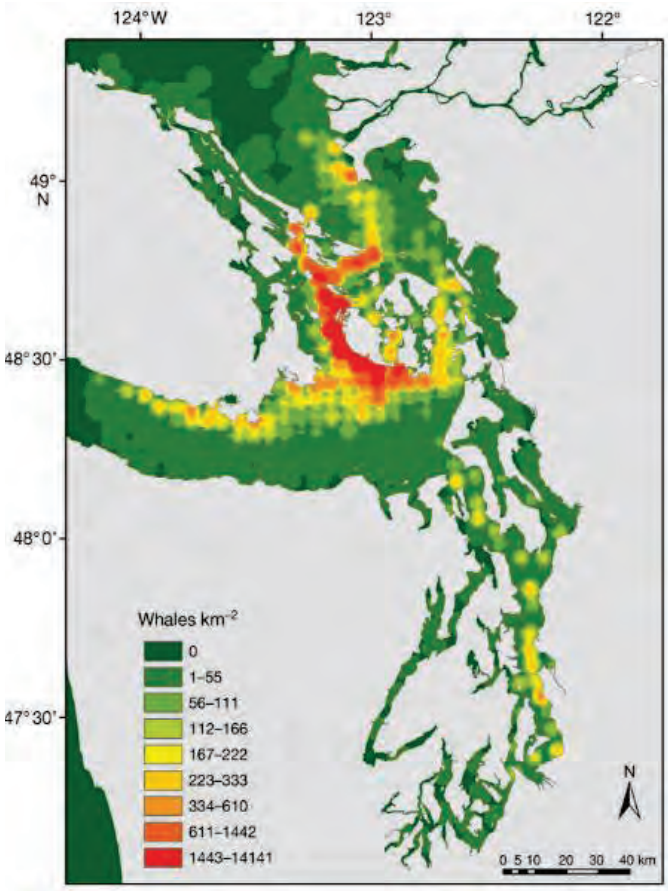


Figure 3: Southern Resident Orca density (number of whales km^{-2}) based on effort-corrected data in the Salish Sea from 1976-2014. Note that waters adjacent to Seattle are a hotspot of Orca sightings. Map from Olson et al. 2018.

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

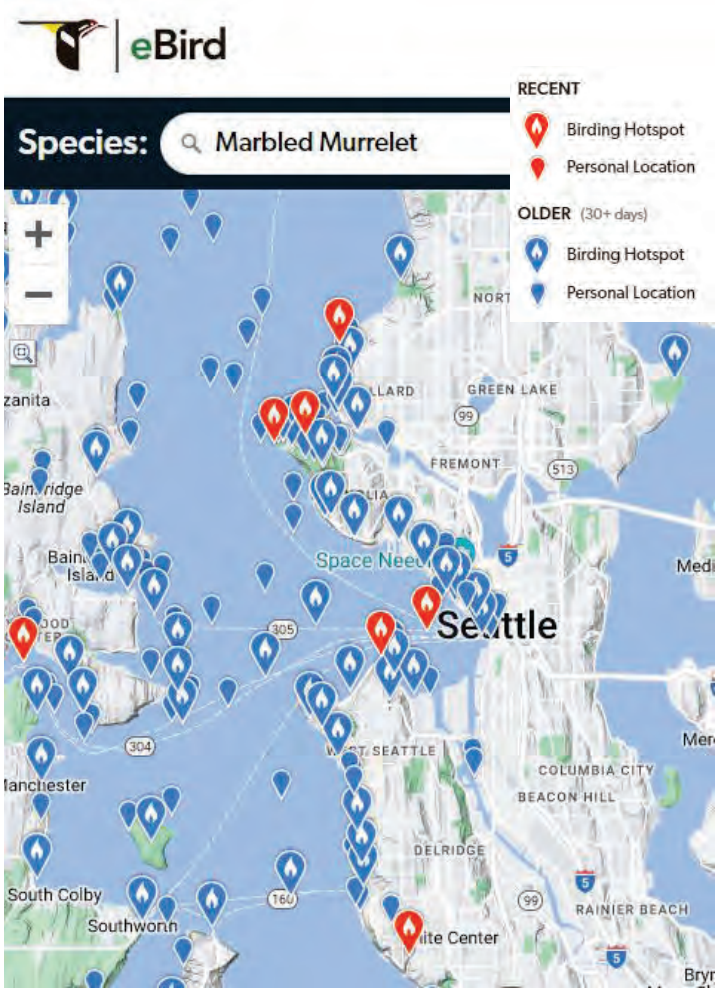


Figure 4: Birding hotspot locations around Seattle from which Marbled Murrelets have been observed. Those in red have observed Marbled Murrelet in the previous 30 days as of May 4, 2024. Visualization from eBird.org.

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.

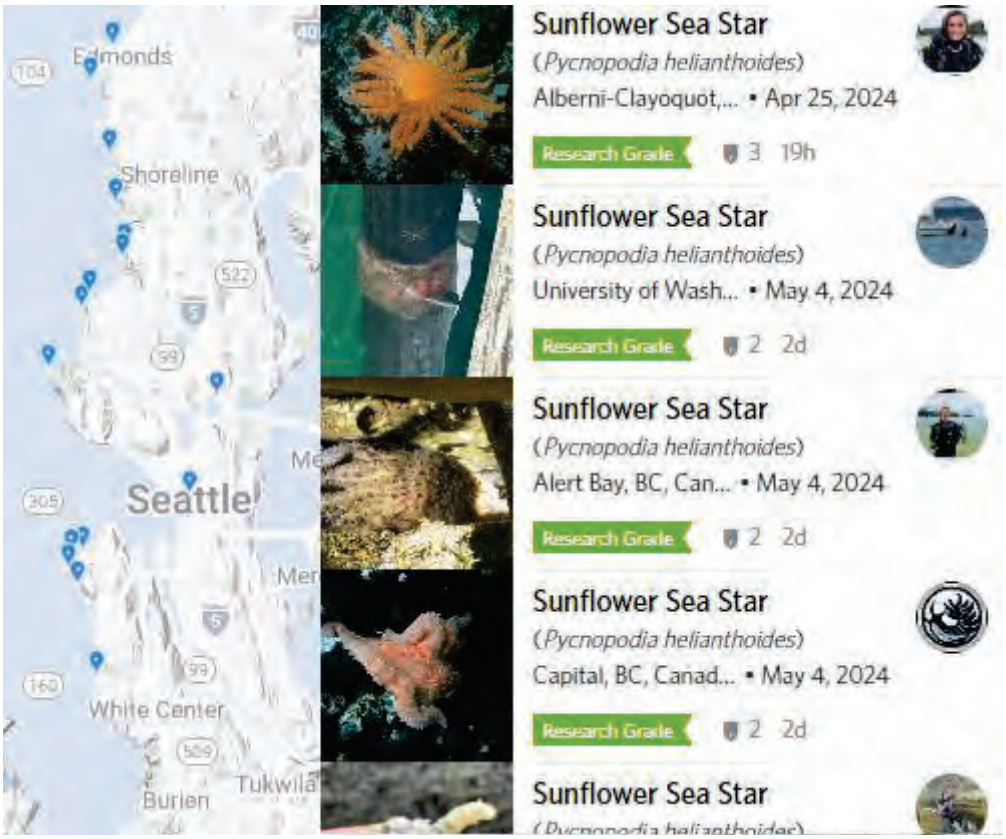


Figure 5: Map showing locations of observations of Sunflower Sea Star along Seattle coast. Visualization from iNaturalist.org.

20-6 cont

RARE SPECIES

Lincoln Park supports a population of native Phantom Orchids (*Cephalanthera austiniae).* 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.

20-6 cont

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.

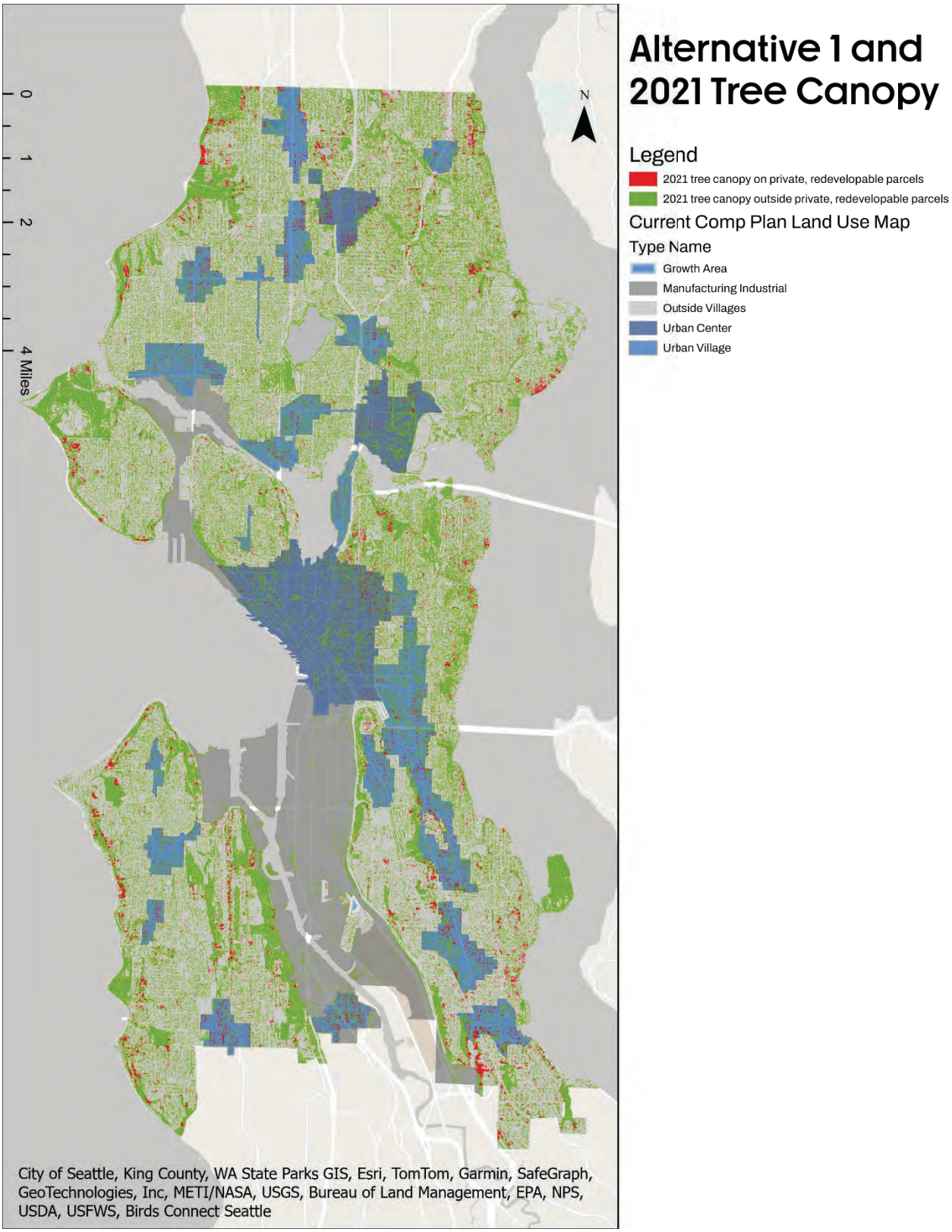


Figure 6: Tree canopy and land use (current Comprehensive Plan)

20-6 cont

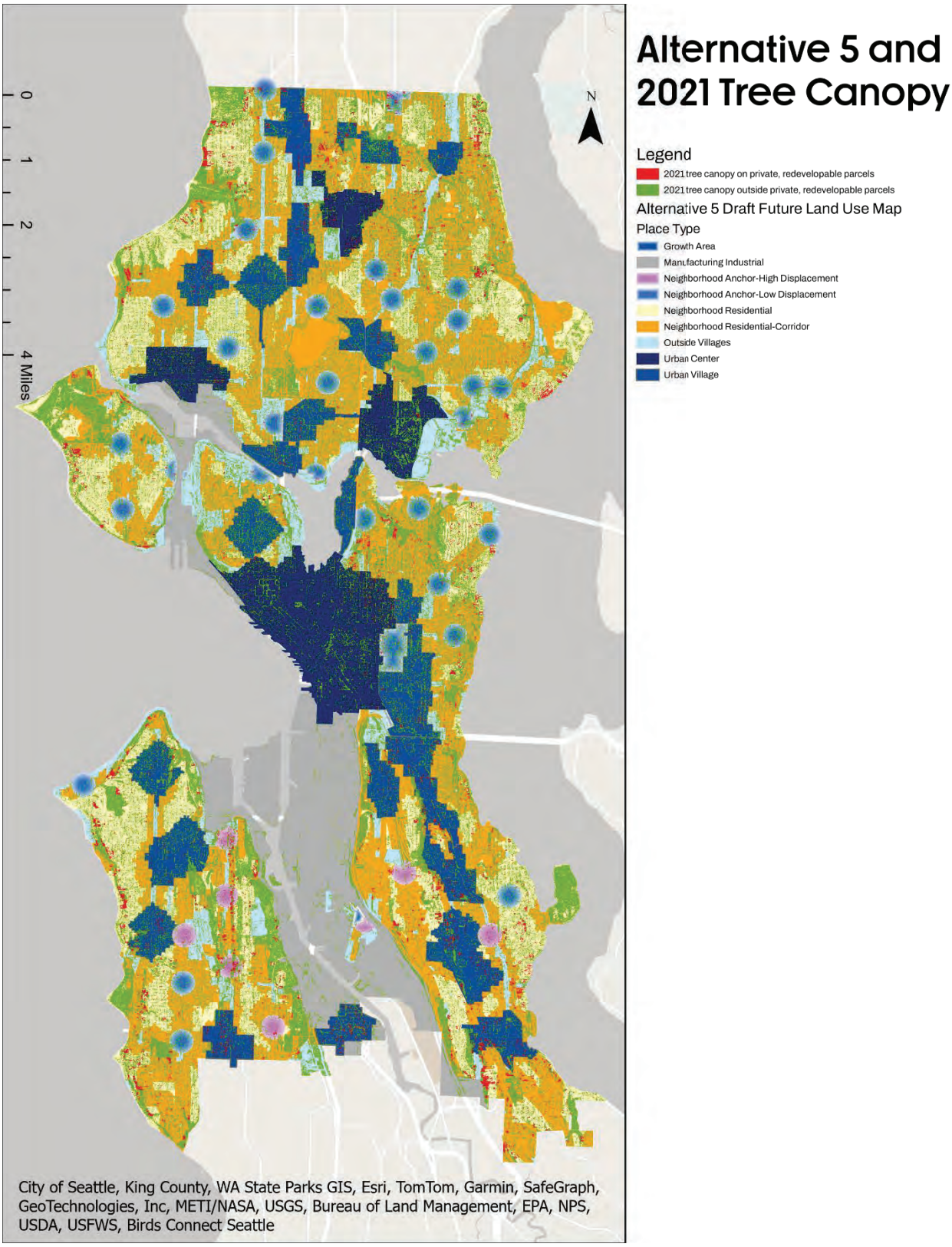


Figure 7: Tree canopy and land use under Alternative 5

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
Manufacturing Industrial	0	0	2.05	2.05	0	0
Neighborhood Anchor-High Displacement	21.00	NA	0	NA	0	NA
Neighborhood Anchor-Low Displacement	0	NA	32.32	NA	0	NA
Neighborhood Residential	0	NA	0	NA	336.18	NA
Neighborhood Residential-Corridor	0	NA	0	NA	290.81	NA
Outside Villages	0	0	0	0	76.53	771.90
Urban Center	45.14	45.14	19.20	5.21	0	
Urban Village	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.

	Delta High Risk (Alt 5-Alt 1)	Delta Low Risk (Alt 5-Alt1)	Delta NA (Alt 5-Alt 1)	Total Delta
Manufacturing Industrial	0	0	0	0
Neighborhood Anchor-High Displacement	21	0	0	21
Neighborhood Anchor-Low Displacement	0	32.32	0	32.32
Neighborhood Residential	0	0	336.18	336.18
Neighborhood Residential-Corridor	0	0	290.81	290.81
Outside Villages	0	0	-695.38	-695.38
Urban Center	0	13.99	0	13.99
Urban Village	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. **20-6 cont**

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.

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EXHIBIT A

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	https://data-seattlecitygis.opendata.arcgis.com/datasets/SeattleCityGIS::environmental-justice-priority-areas/about	Jan 26, 2024
Tree_Canopy_2021_Seattle	https://data-seattlecitygis.opendata.arcgis.com/datasets/SeattleCityGIS::seattle-tree-canopy-2021/about	Jan 26, 2024
Zoned Development Capacity by Development Site Current	https://data-seattlecitygis.opendata.arcgis.com/datasets/SeattleCityGIS::zoned-development-capacity-by-development-site-current/about	Jan 27, 2024
Unofficial neighborhood boundaries	https://www.arcgis.com/home/item.html?id=8adffd6b8fba4a84966fa7471afd0d6c	Nov 29, 2023

Defining and mapping development-threatened tree canopy procedure:

1. 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"
2. Add new field to "Development Threatened Tree Canopy 2021 in EJ Priority Areas" called "DTTC_Acres" (double).
3. Calculate geometry of DTTC_Acres
   Property = Area (geodesic)
   Area Unit = Acres
   Coordinate system = default
4. Intersect Development Threatened Tree Canopy 2021 in EJ Priority Areas with Neighborhoods layer. Call it DTTC_Neighborhoods_Intersect
5. Add new field to "DTTC_Neighborhoods_Intersect" called "DTTC_Hood_Acres" (double).
6. 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".

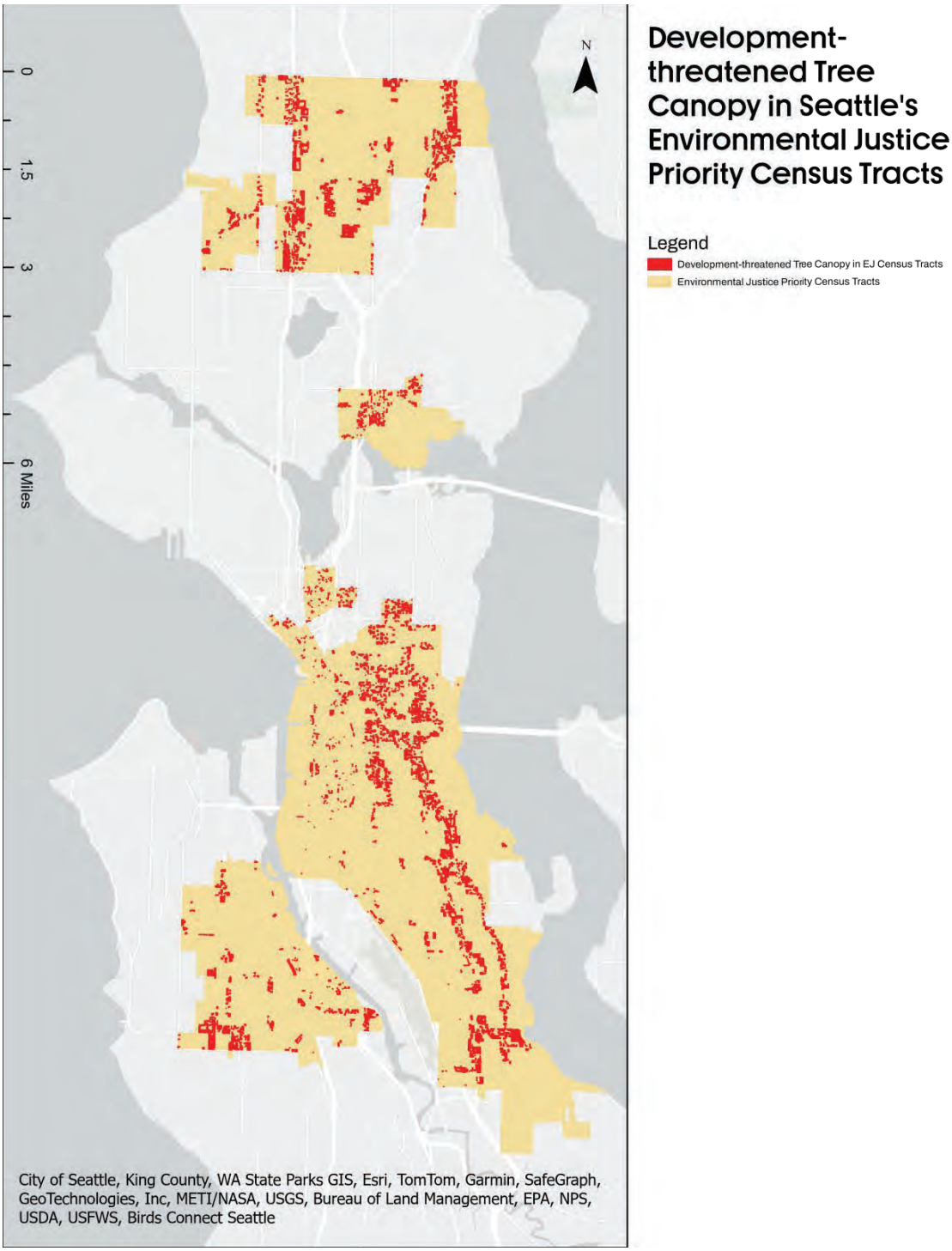
RESULTS

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



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
TOTAL	**211.65**	**206.66**	**216.63**

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
TOTAL	211.65	206.66	216.63

Letter 21

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 midrises up to 85 feet in transit corridors and Neighborhood Centers, to maximize the potential of wood-frame construction.

Letter 22

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.

22-2 cont

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.

22-3

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.

Letter 23

FRIENDS OF RAVENNA-COWEN

May 4 2024

To: OneSeattleCompPlan@seattle.gov
To: PCD_CompPlan_EIS@seattle.gov
cc: Bruce.Harrell@seattle.gov , 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 is 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

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.

23-1 cont

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

- 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

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.

23-2 cont

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. 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.

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.

23-3 cont

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 [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.

23-3 cont

- 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 need 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.

23-3 cont

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.

23-3 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 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

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.

23-3 cont

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.

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

Letter 24

Ballard Alliance

May 6, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov

Re: Comments on One Seattle Plan Draft Environmental Impact Statement

24-1

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.

24-1 cont

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 15th 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 15th Avenue and 24th 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.

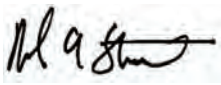
7. **Invest in livability:** We emphasize the need for increased green space and pedestrian amenities to enhance the livability and well-being of our community. These areas contribute to the physical and mental well-being of our residents, improve the environment, and complement active retail centers. 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.

24-1
cont

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

Letter 25

From: Jay Lazerwitz
To: PCD_CompPlan_EIS; Hazelhoff, Aja
Subject: Roosevelt neighborhood Comp Plan Implications
Date: Tuesday, March 26, 2024 5:35:19 PM

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?

25-1

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

Letter 26

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 Gurkewitz,
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: **26-5**

    - Where does the assumption that 15% of new jobs would be shifted to the location of new housing come from?

    - 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?

- 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 environmental (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

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

- 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, Mildrexier, 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).

26-11 cont

- 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?

3. Plants and Animals (3.3)

- 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.

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? **26-13 cont**

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. **26-14**

- 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: **26-15**

  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

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.

26-15 cont

- 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/

26-16

- "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

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?

26-17

- 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 Rights of Way, 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 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?

26-17 cont

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.

Letter 27

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

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.

27-1

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:

27-1 cont

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 41st St community center*** nearest b*ecause 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?***

27-2

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'?***

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. **27-2 cont**

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?

27-3 cont

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?

27-3 cont

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?

27-3 cont

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 **t**o 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.

27-3 cont

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 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.)

27-3 cont

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".

27-3 cont

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?***

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.

27-4

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***

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

27-4 cont

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 p**assage and better capturing of storm water.

27-4 cont

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. **27-4 cont**

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 **27-5**

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.

27-5 cont

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?*

27-5 cont

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.***

27-5 cont

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.

27-6

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.

27-6 cont

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?***

27-6 cont

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 caonopy 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”?.*

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?*

27-7 cont

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.*

27-8

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?***

27-8 cont

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 organoztions 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.

27-9 cont

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 Seattles' 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 tripexes in traditional neighborhood with natural materials

Letter 28

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

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. 28-1

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.

28-1 cont

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 b*ecause 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'?***

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.

28-1 cont

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?***

28-2 cont

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.

28-2 cont

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 **t**o 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***.

28-2 cont

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 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 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.

28-2 cont

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.

28-2 cont

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.

28-2 cont

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.

28-3

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).

28-3 cont

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 p**assage 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?***

28-3 cont

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..." 28-3 cont

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. 28-4

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?***

28-4 cont

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

28-4 cont

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 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 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?***

28-4 cont

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.

28-5

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

28-5 cont

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)

28-5 cont

CE G 12 ***Seattle has a goal of 30% tree canopy (used to be by 2030??) LCC agrees that increasing the tree caonopy 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

28-6

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?***

28-6 cont

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. *Wlth 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.

28-7 cont

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 organoztions 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

28-8

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***?

28-8 cont

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

Letter 29

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. 29-1
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? 29-2
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'?

Letter 30

DEIS StoryMap Comment

Name: Colleen McAleer

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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”.

30-1

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.

30-1
cont

Letter 31

DEIS StoryMap Comment

Name: Colleen McAleer

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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. 31-1
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

31-1 cont

Letter 32

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? 32-1
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.

32-1
cont

Letter 33

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. 33-1
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

33-1 cont

Letter 34

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? 34-1
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?

34-1 cont

Letter 35

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?

35-1

DEIS StoryMap Comment

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Date: 5/6/2024

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.

36-1

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.

36-1 cont

Letter 37

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.

37-1

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.

37-1 cont

Letter 38

DEIS StoryMap Comment

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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. 38-1
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.

38-1 cont

Letter 39

DEIS StoryMap Comment

Name: Colleen McAleer

Organization: Laurelhurst Community Club Council

Email: billandlin@aol.com

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

39-1

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.

39-1 cont

Letter 40

DEIS StoryMap Comment

Name: Colleen McAleer

Organization: Laurelhurst Community Club Council

Email: billandlin@aol.com

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? 40-1
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,

Letter 41

DEIS StoryMap Comment

Name: Colleen McAleer

Organization: Laurelhurst Community Club Council

Email: billandlin@aol.com

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.

41-1

Letter 42

DEIS StoryMap Comment

Name: Colleen McAleer

Organization: Laurelhurst Community Club Council

Email: billandlin@aol.com

Date: 5/6/2024

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. 42-1
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.

Letter 43

DEIS StoryMap Comment

Name: Colleen McAleer

Organization: Laurelhurst Community Club Council

Email: billandlin@aol.com

Date: 5/6/2024

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. 43-1
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”.

43-1 cont

Letter 44

DEIS StoryMap Comment

Name: Colleen McAleer

Organization: Laurelhurst Community Club Council

Email: billandlin@aol.co

Date: 5/6/2024

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

Letter 45

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.

45-1

Letter 46

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

Letter 47a

BELLWETHER HOUSING

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
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.

47a-1

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

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.

47a-1 cont

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,



Susan Boyd, Chief Executive Officer
Bellwether Housing

Letter 47b

BELLWETHER HOUSING

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
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.

47b-1

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 92nd 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

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.

47b-1 cont

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,



Susan Boyd, Chief Executive Officer
Bellwether Housing

Letter 48

McCULLOUGH HILL PLLC

May 3, 2024

OPCD
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes, Rico Quirindongo
PCD_compplan_EIS@seattle.gov
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**

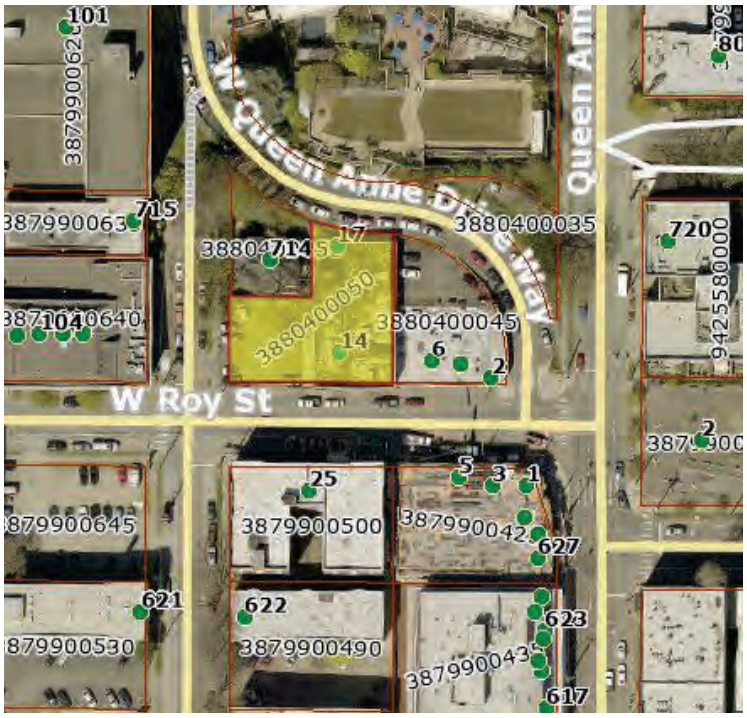
Dear Mr. Quirindongo,

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.

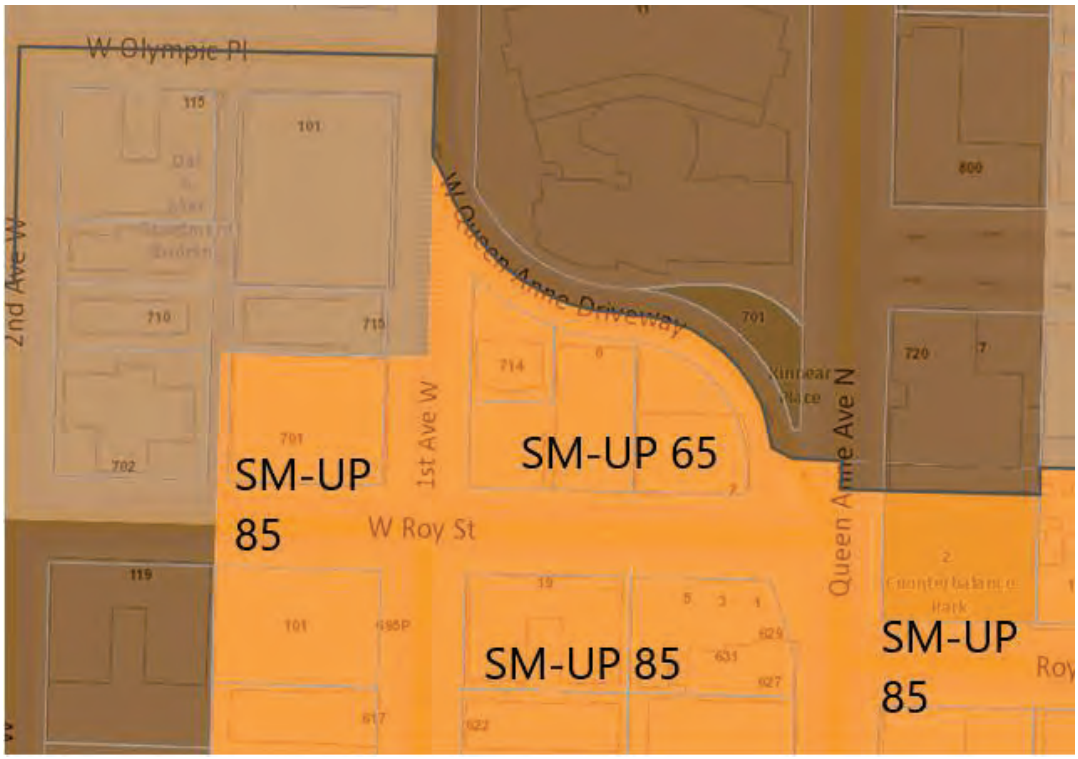
48-1

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

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.



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.

48-1 cont

Please do not hesitate to contact us if we can provide any additional information about the above.

48-1
cont

Sincerely,

Jessica M. Clawson

On behalf of West Roy LLC

Letter 49

McCULLOUGH HILL PLLC

May 6, 2024

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
Email: 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 100th Street and 9725 3rd 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.



49-1

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.

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.

49-1 cont

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

Letter 50

McCULLOUGH HILL PLLC

May 6, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes
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.

50-1

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 4th 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 73rd Street and Roosevelt Way NE. Shares property line with LR1 zoned property. RUV is current FLUM designation.
- **1008 NE 72nd Street.** Zoned LR1(M1) and currently in single family use. Located in Roosevelt Residential Urban Village; RUV is current FLUM designation.
- **8040 16th 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 15th 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 35th 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/15th 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, 15th 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 15th, 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 16th 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 15th 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 16th Avenue NE parcel (split zoned C1 and NR). Split zoned conditions should be cleaned up and eliminated in the implementation of this Comprehensive Plan.

51-1 cont

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

51-2

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).

51-2 Cont

We appreciate the opportunity to comment and look forward to implementation of the One Seattle Plan.

Sincerely,

Jessica M. Clawson

Letter 52

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
www.mhseattle.com

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From: Isaac Patterson <ipatterson@mhseattle.com>
Sent: Monday, May 6, 2024 2:52 PM
To: PCD_CompPlan_EIS@seattle.gov
Cc: Jim.Holmes@seattle.gov; Jessica Clawson <jessica@mhseattle.com>
Subject: 70th & Greenwood Ave LLC One Seattle Plan DEIS comment letter

52-1

Hi Jim and OPCD,

Please see the attached comment letter on behalf of 70th & 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
www.mhseattle.com

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Letter 53

McCULLOUGH HILL PLLC

May 13, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes
PCD_CompPlan_EIS@seattle.gov

RE: Comments on the Draft One Seattle Plan

Dear Mr. Holmes,

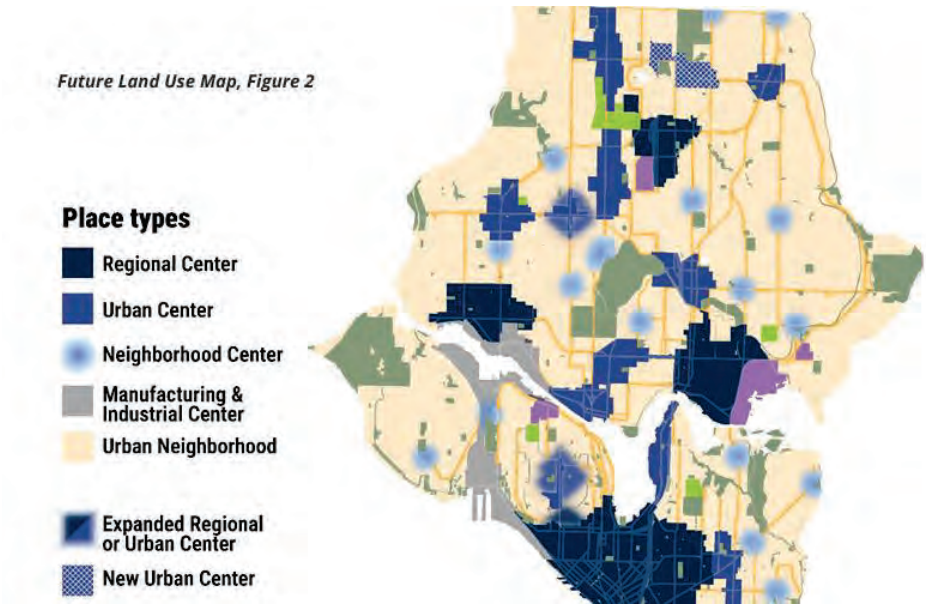
Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impacts Statement ("DEIS") and One Seattle Comprehensive Plan: Draft for Public Review ("Draft Plan Update").

70th & 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 85th 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 67th Street and Phinney Avenue North to the south and Greenwood Avenue and North 73rd Street to the north.

53-1

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.



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."

53-1 cont

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 73rd 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.

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

Letter 54

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
oneseattlecompplan@seattle.gov;
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.

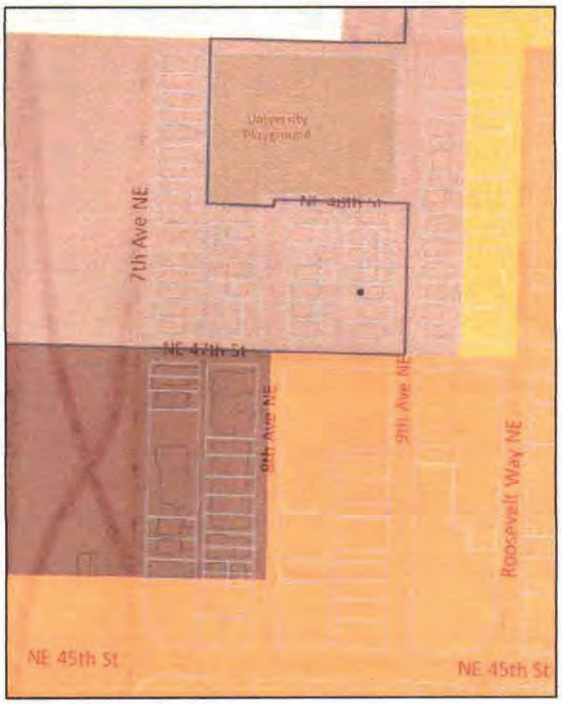


Figure 1. Current zoning surrounding my property. Light brown is low-rise, mustard yellow is neighborhood commercial, orange is Seattle Mixed, and darker brown is mid-rise.

54-1

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.[1] 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. 54-1 cont

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.**

---

[1] *See* 2022 Comprehensive Plan at page 41.

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.

54-1 cont

Sincerely,

Matt Cramer

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)

Letter 55

May 6, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes
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 26th 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 26th 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. 55-1

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 15th Avenue on Capitol Hill, and the east side of 34th 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.

55-1 cont

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

55-1
cont

Letter 56

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

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
Web Site: www.danfioritolaw.com

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56-1

THE LAW OFFICE OF
DAN N. FIORITO III

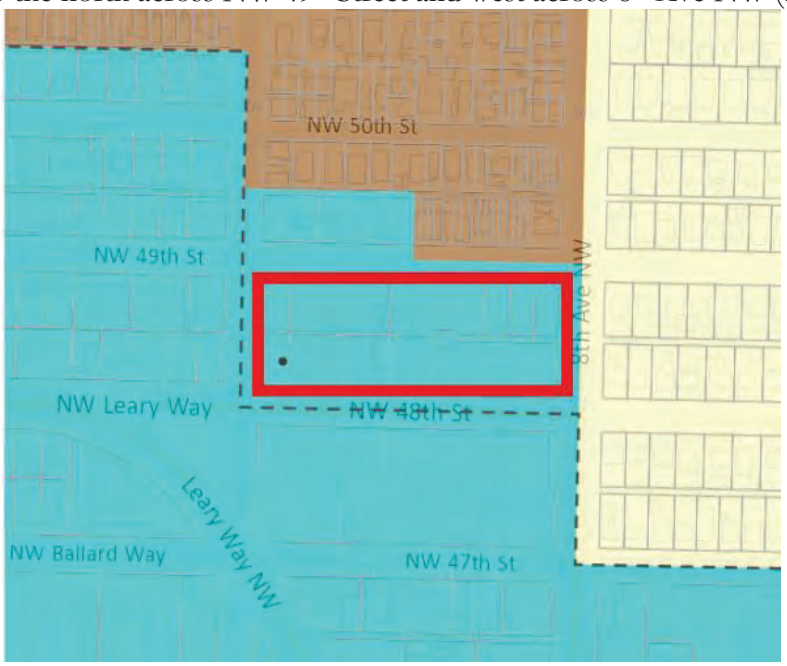
May 6, 2024

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: 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 48th Street, NW 49th Street, 8th Ave NW, and 9th 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 49th Street and west across 8th Ave NW (shown below).



56-1 cont

2470 Westlake Ave. N., Suite 201
Seattle, WA 98109
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dan@danfiorito.com

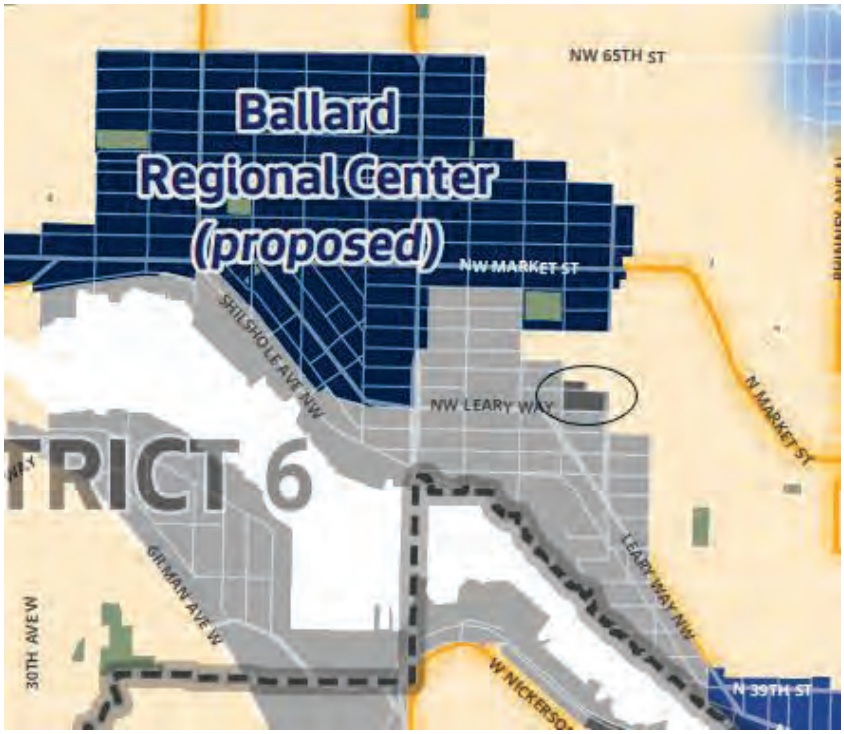
We write to request that the One Seattle Plan resolve our FLUM designation and bring it into the Ballard Regional Center. To serve that goal, the Final Environmental Impact Statement ("FEIS") should study our Property and other isolated lands outside the BINIMC for the Ballard Regional Center designation with appropriate heights as adjacent to the 8th 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.

56-1 cont

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 8th Avenue from NW 52nd Street to NW 48th 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

Letter 57

ALEXANDRIA®

Building the Future of Life-Changing Innovation

May 6, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
Email: 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 4th 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

Alexandria Real Estate Equities, Inc.
400 Dexter Avenue North, Suite 200 | Seattle, WA 98109
TEL 206.408.1550 | FAX 206.325.6348 | www.are.com

- 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.

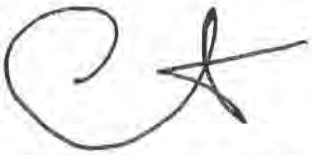
57-1 cont

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.

Sincerely,



CHRISTIAN GUNTER
Senior Vice President - Development
Alexandria Real Estate Equities, Inc.
400 Dexter Avenue North Suite 200
Seattle, WA 98109

Letter 58

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.[1] 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. 58-1

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").

[1] 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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Letter 58

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.[2] 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.*[3]

- *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

[2] *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").

[3] *See* https://www.sandiego.gov/development-services/news-programs/life-science-industry-pilot-program

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

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. 58-3 cont

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

Chhan Investments LLC
1700 7th Ave Suite 2100
Seattle, WA 98101

Letter 59

May 3, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: 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

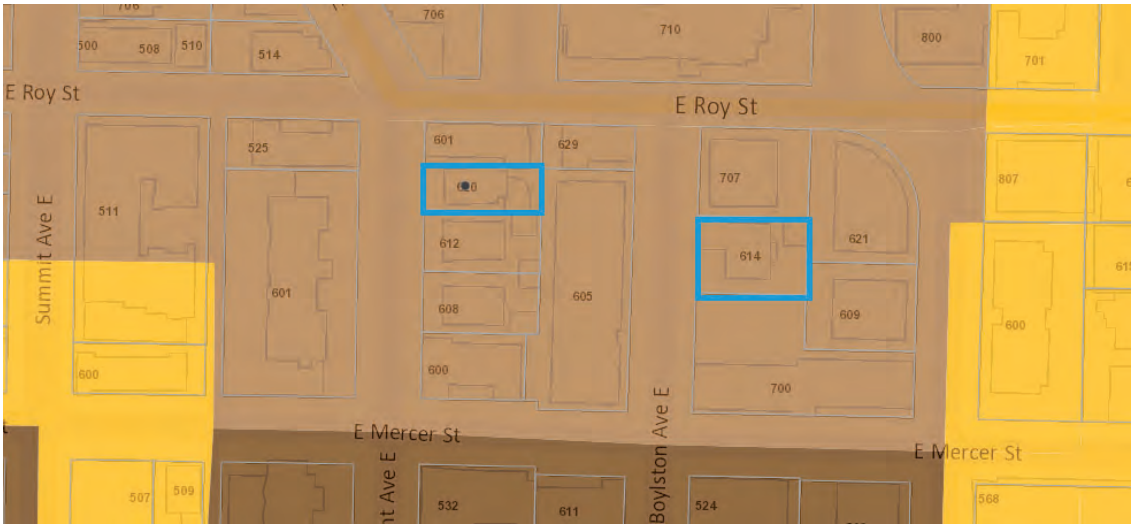
Both Properties are currently developed with single-family residences; however, 614 Boylston is currently used as an office. Overall, we support the Mayor's vision for the One Seattle growth strategy.

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.

Chhan Investments LLC
1700 7th Ave Suite 2100
Seattle, WA 98101



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.

59-1 cont

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

Letter 60

600 University St, Ste 1020
Seattle, WA 98101-4107
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(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. 60-1

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 cont

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.



60-1 cont

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

Letter 61

May 3, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov

Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement
MRH Properties, LLC 1103 – 1109 North 36th 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 36th 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.

61-1
cont

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

Letter 62

SCHNITZER WEST

May 6, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
Email: 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. 62-1

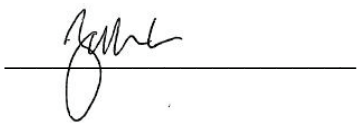
Unfortunately, the current zoning provisions for residential development in the Uptown neighborhood impose obstacles to such development. The 85-foot height limit does not support the kind of residential development that could be achieved in this center-city neighborhood and does not incentivize the 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.

We appreciate your attention to these comments and welcome an opportunity to meet with you to review our research & work product attached hereto.

62-1
cont

Sincerely,



Zeb Keck
Partner and Senior Director, Construction & Development

Seattle Mixed - Uptown

Zoning Height Analysis

01-17-2024

62-1
cont

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

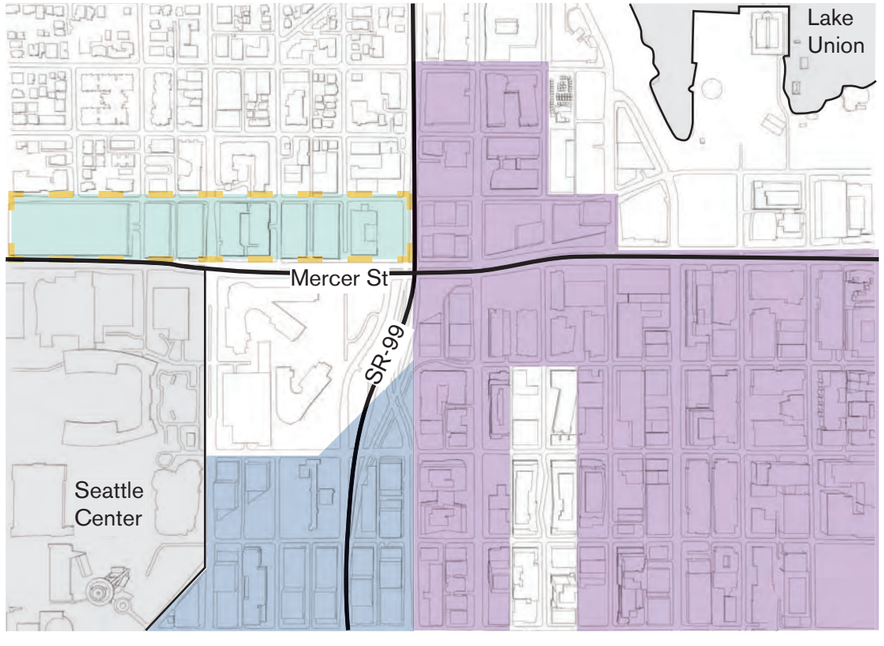
- **Podium Height:**
  45 ft
- **Lot Coverage Above Podium:**
  Avg GFA 50% max
- **Floor Area Ratio:**
  Base for all uses: 5
  Max Residential: 7 Non-Residential: 2
- **Floor Area Limits Above Podium:**
  Avg 12,500 SF/floor max
- **Upper Level Setbacks:**
  For designated streets, setback avg of 10 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

62-1 cont

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

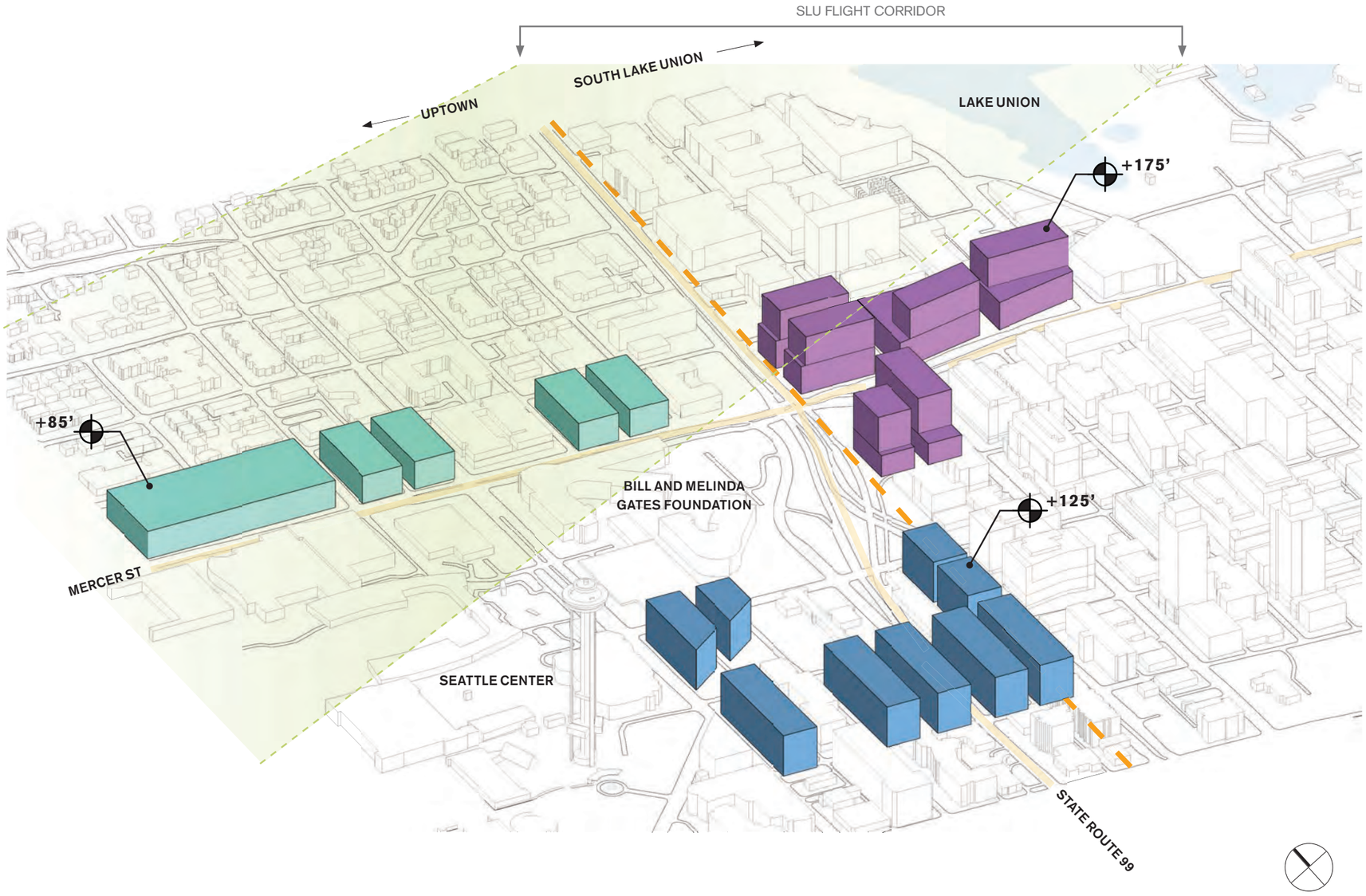
SM-SLU 175/85-280
Seattle Mixed - SLU: 280’ Height Limit

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



62-1 cont

Key

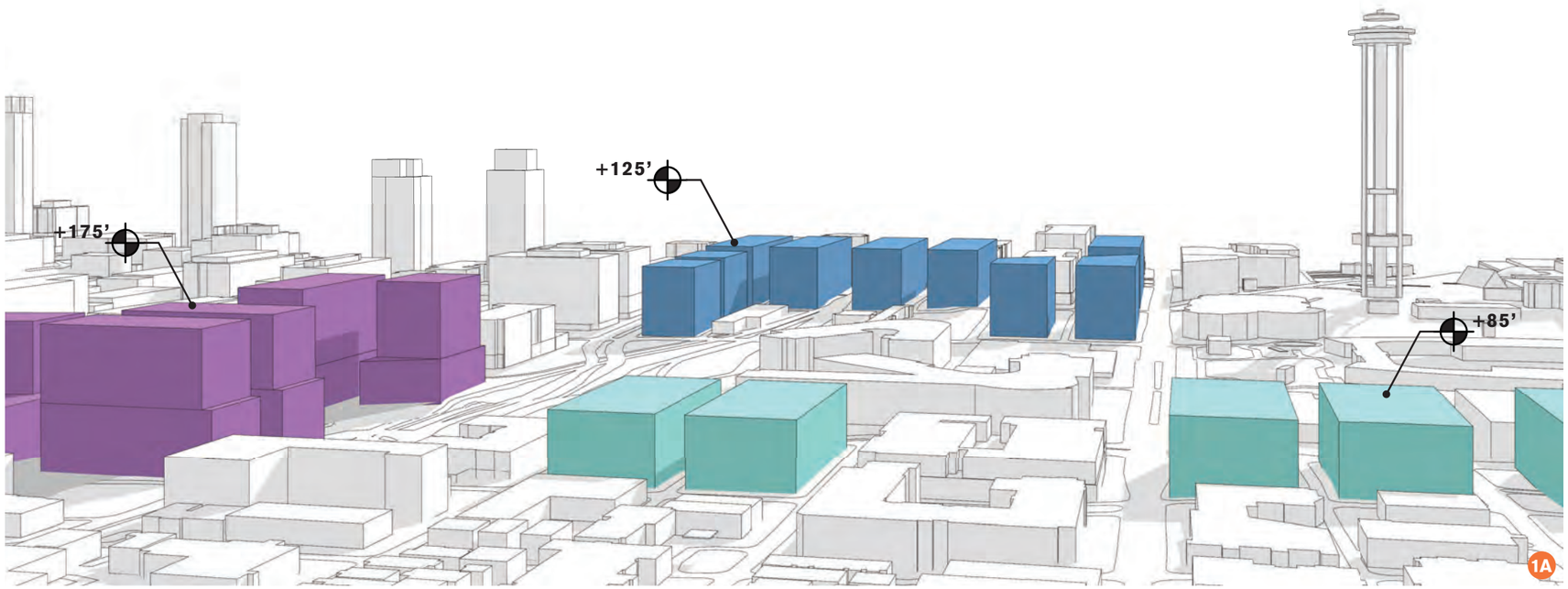
SM-SLU 175/85-280
Seattle Mixed - SLU: 280’ Height Limit

SM-UP 160
Seattle Mixed - Uptown: 160’ Height Limit

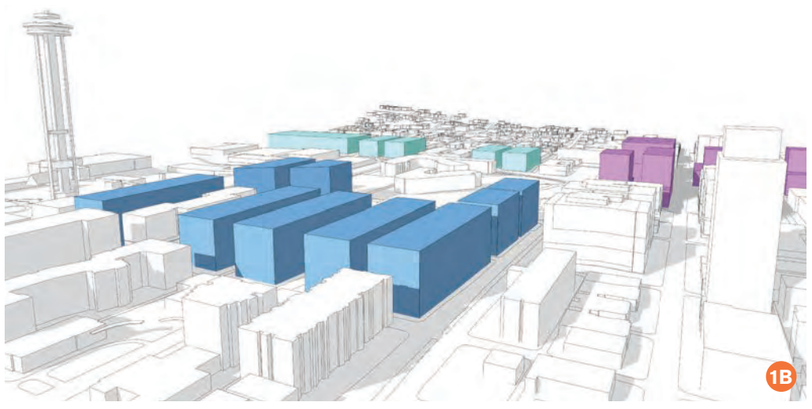
SM-UP 85
Seattle Mixed - Uptown: 85’ Height Limit



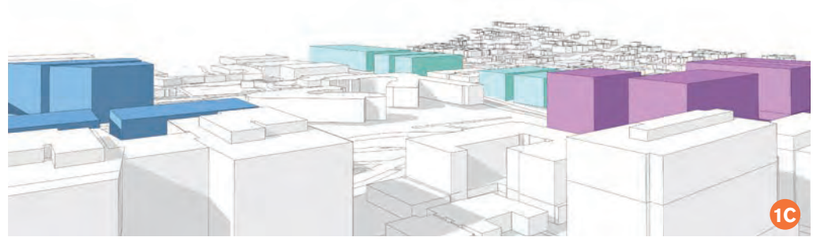
Perspective View Facing South



Perspective View Facing Northwest



Perspective View Facing West



62-1 cont

Map Key

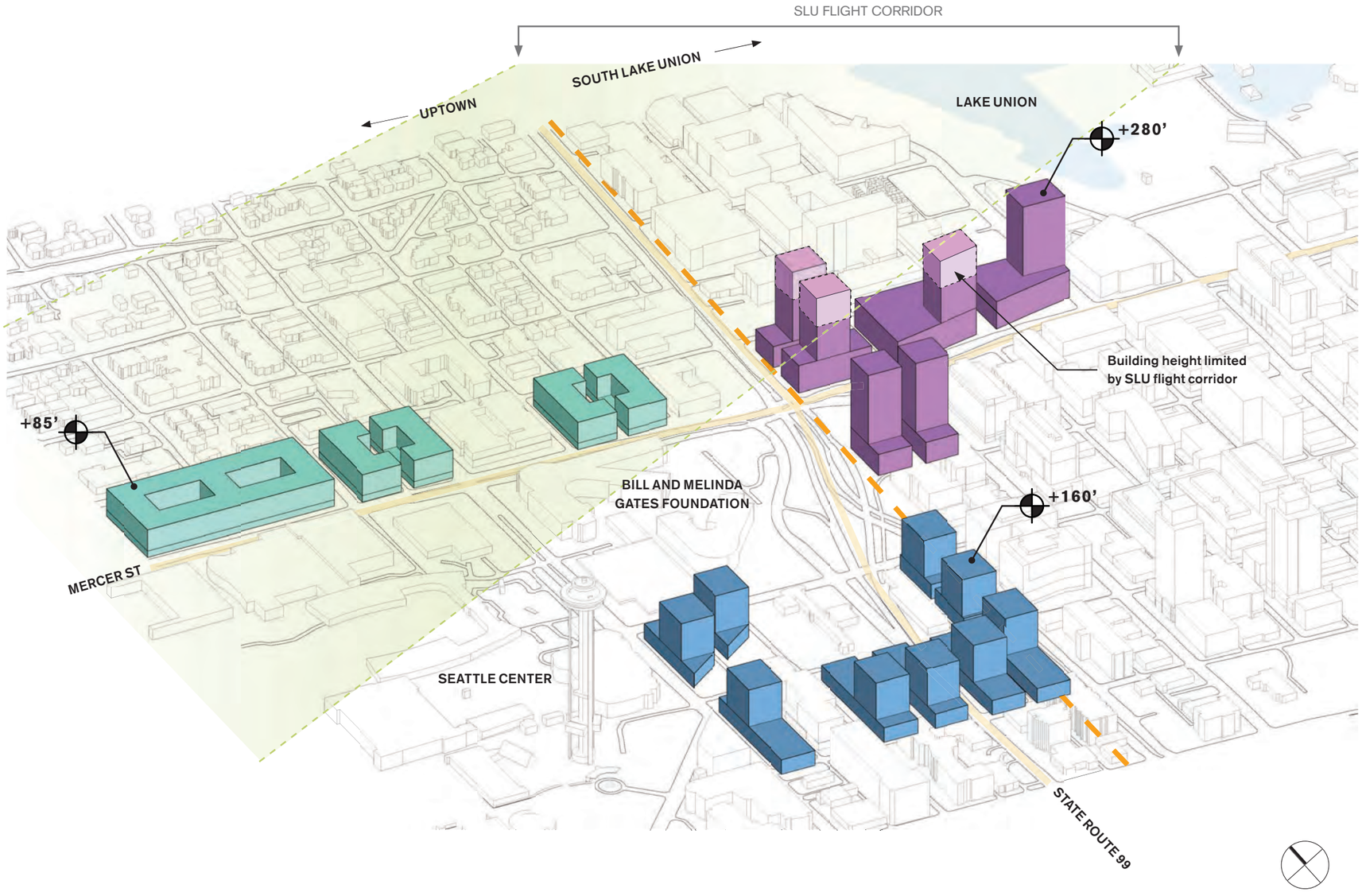
SM-SLU 175/85-280
Seattle Mixed - SLU: 280’ Height Limit

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



62-1
cont

62-1
cont

Key

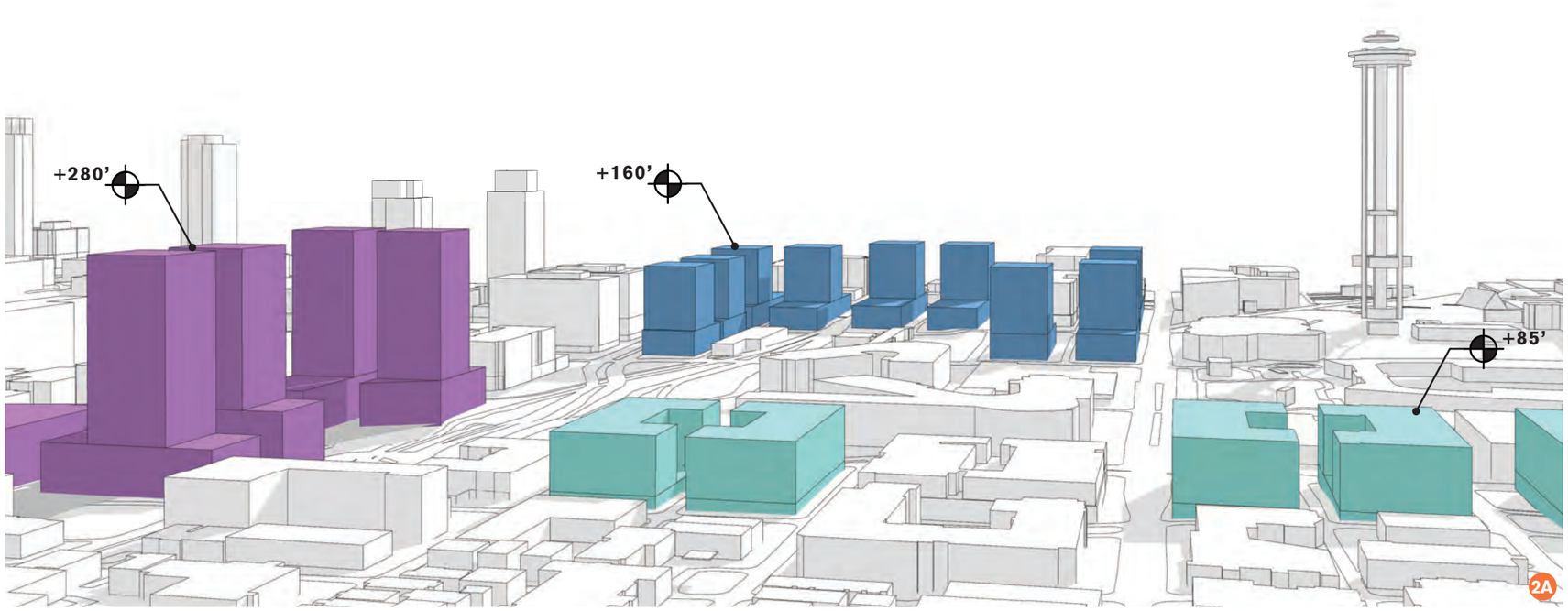
SM-SLU 175/85-280
Seattle Mixed - SLU: 280’ Height Limit

SM-UP 160
Seattle Mixed - Uptown: 160’ Height Limit

SM-UP 85
Seattle Mixed - Uptown: 85’ Height Limit



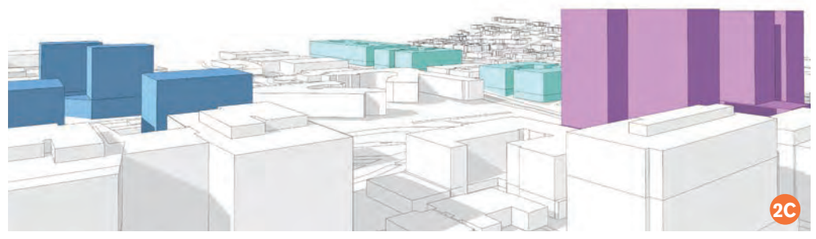
Perspective View Facing South



Perspective View Facing Northwest



Perspective View Facing West



Map Key

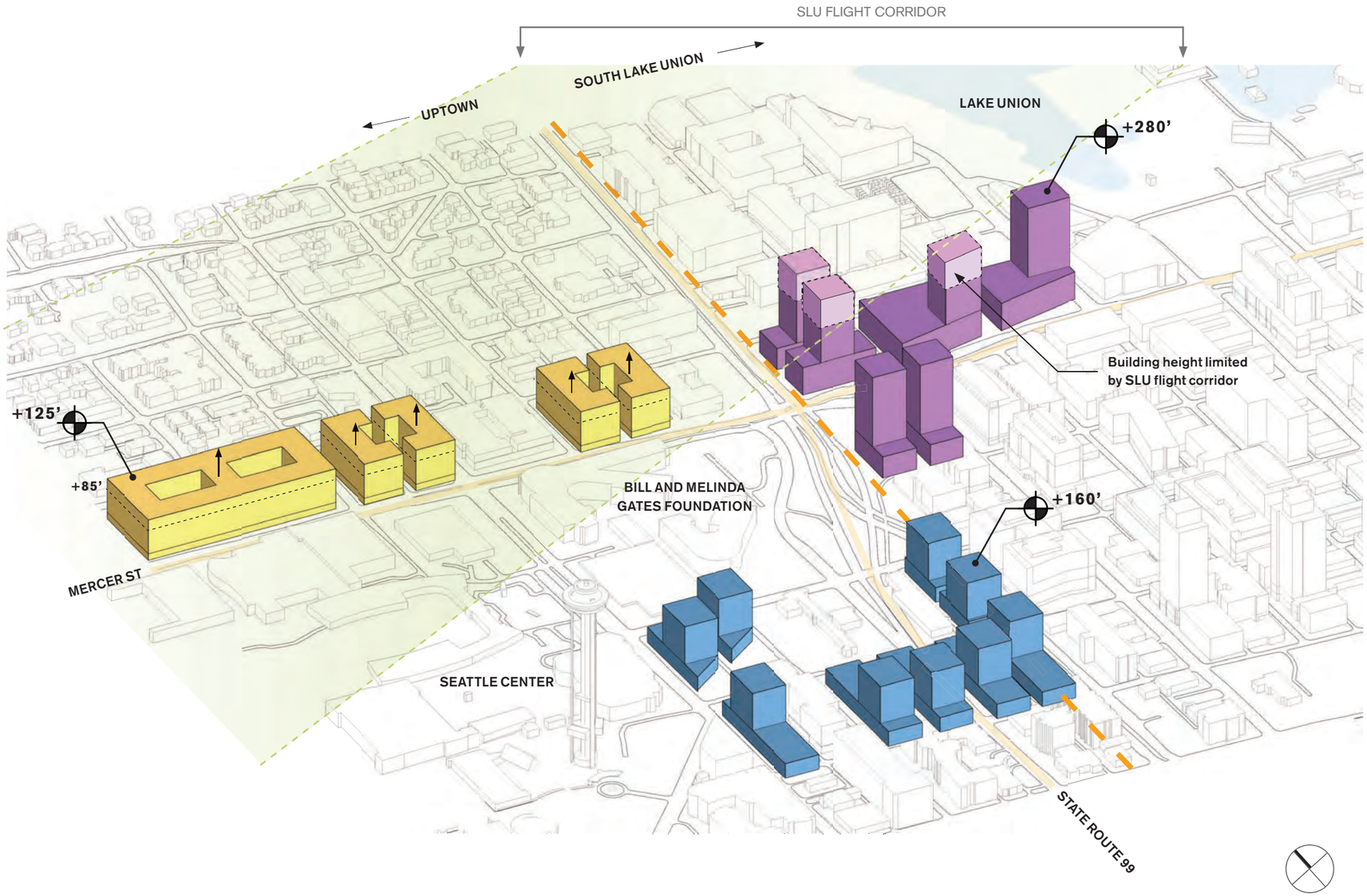
SM-SLU 175/85-280
Seattle Mixed - SLU: 280’ Height Limit

SM-UP 160
Seattle Mixed - Uptown: 160’ Height Limit

PROPOSED SMU-UP 125
Seattle Mixed - Uptown: 125’ Height Limit

Urban Center Village Boundary

Proposed Residential Zoning Height Limits - Aerial view facing Northeast



62-1
cont

Key

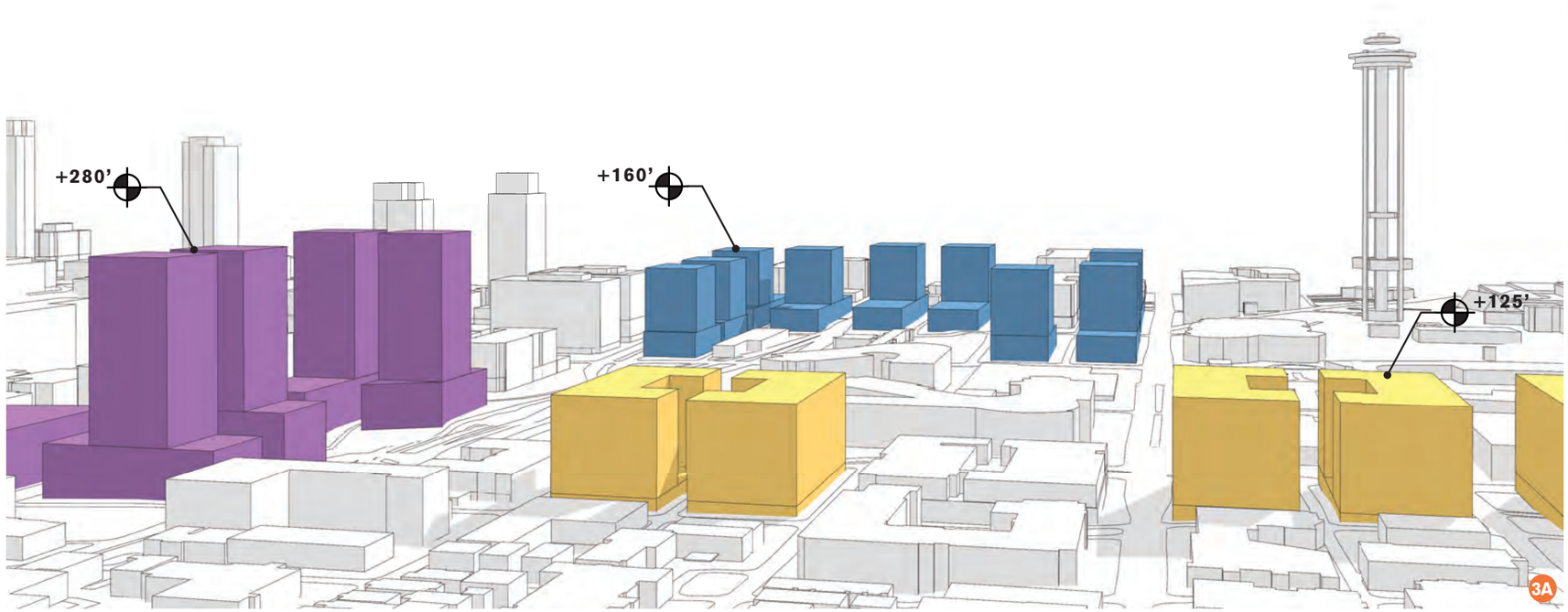
SM-SLU 175/85-280
Seattle Mixed - SLU: 280’ Height Limit

SM-UP 160
Seattle Mixed - Uptown: 160’ Height Limit

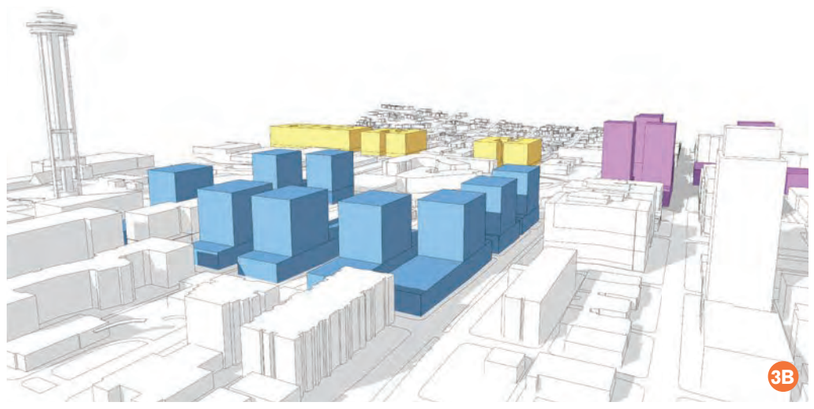
PROPOSED SMU-UP 125
Seattle Mixed - Uptown: 125’ Height Limit



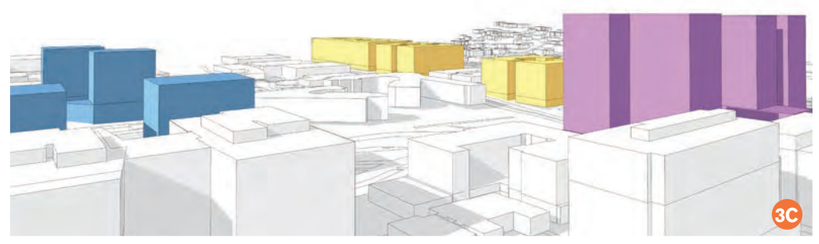
Perspective View Facing South



Perspective View Facing Northwest



Perspective View Facing West



62-1 cont

Letter 63

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. 63-1

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

Letter 64

DCL Management LLC.

VISTA PACIFIC GROUP
COMMERCIAL PROPERTIES

May 3, 2024

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov
Email: 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 46th 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. 64-1

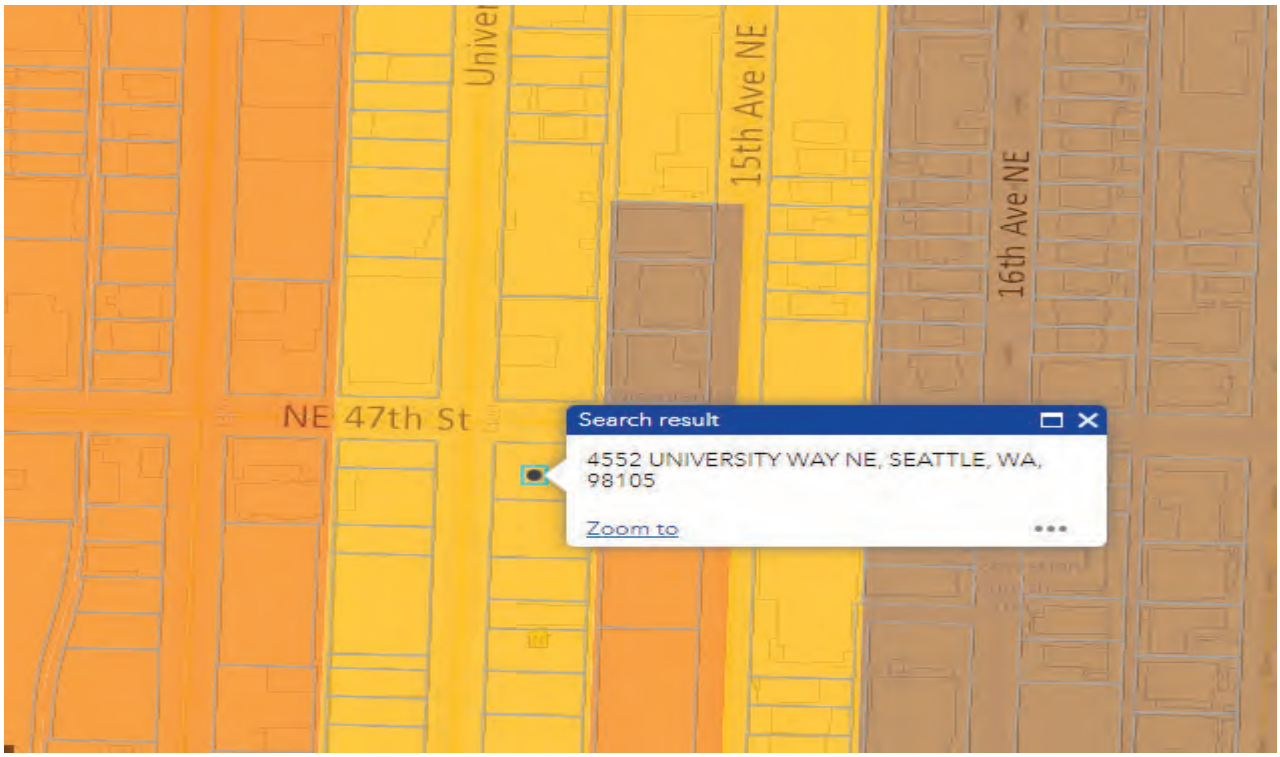
The Property is 8,240 sf in area and is currently occupied by a two-story retail building. Located in close proximity to light rail and bus stops, the University of Washington campus, and the Ave's prime retail corridor, the Property presents an ideal opportunity for mixed-use redevelopment.



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

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 46th 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.

64-1 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

cc: Councilmember Rivera

Letter 65

DCL Management LLC.

VISTA PACIFIC GROUP
COMMERCIAL PROPERTIES

May 3, 2024

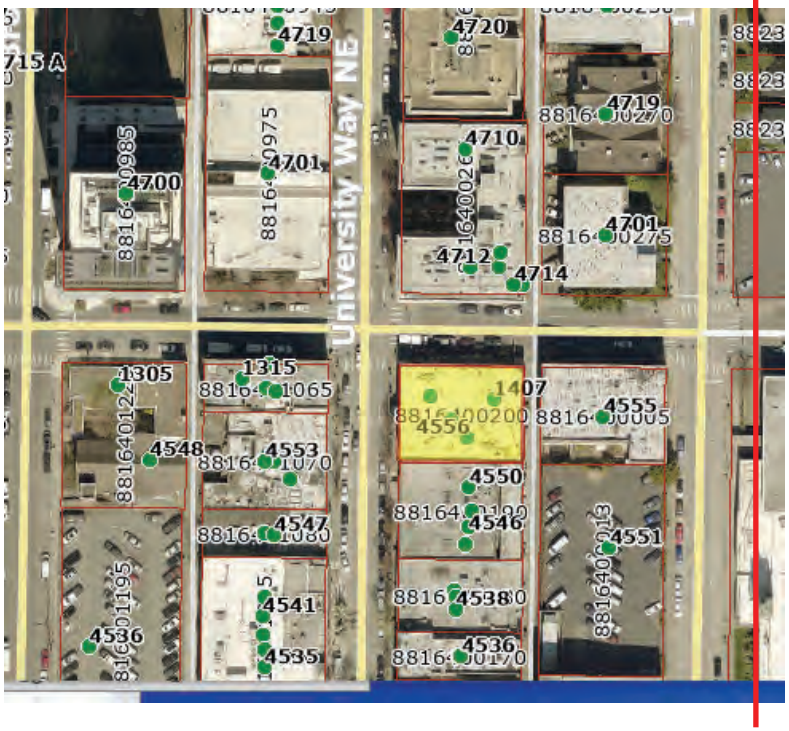
Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov
Email: OneSeattleCompPlan@seattle.gov

Re: One Seattle Plan
4552 University Way NE - Support for Alternative 5

Dear Mr. Quirindongo,

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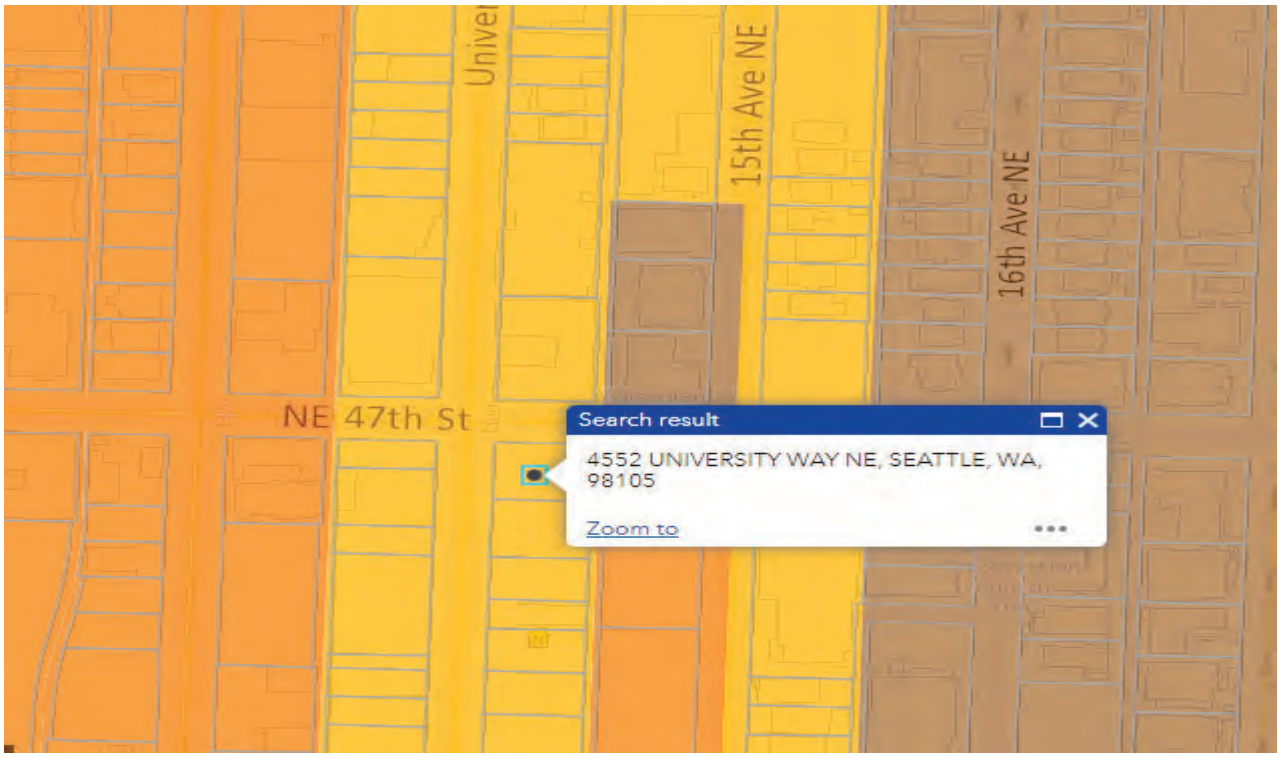
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65-1 cont



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

cc: Councilmember Rivera

Letter 66

May 6, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov
Email: 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. 66-1

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" note 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

66-1
cont

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.

66-1 cont

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

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	21,600
7666204345	Lander Street Prtn.	545/555 S. Lander 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

Letter 67

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 and 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 35th Avenue NE and 85th 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. 67-1

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.

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 35th 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 sates:
"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)

67-1 cont

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.

67-1 cont

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,

John Marasco, Chief Development Officer
Security Properties

Letter 68

PROLOGIS

May 6, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes
Email: PCD_CompPlan_EIS@seattle.gov

Re: One Seattle Plan Comment
2300 26th 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 26th 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.

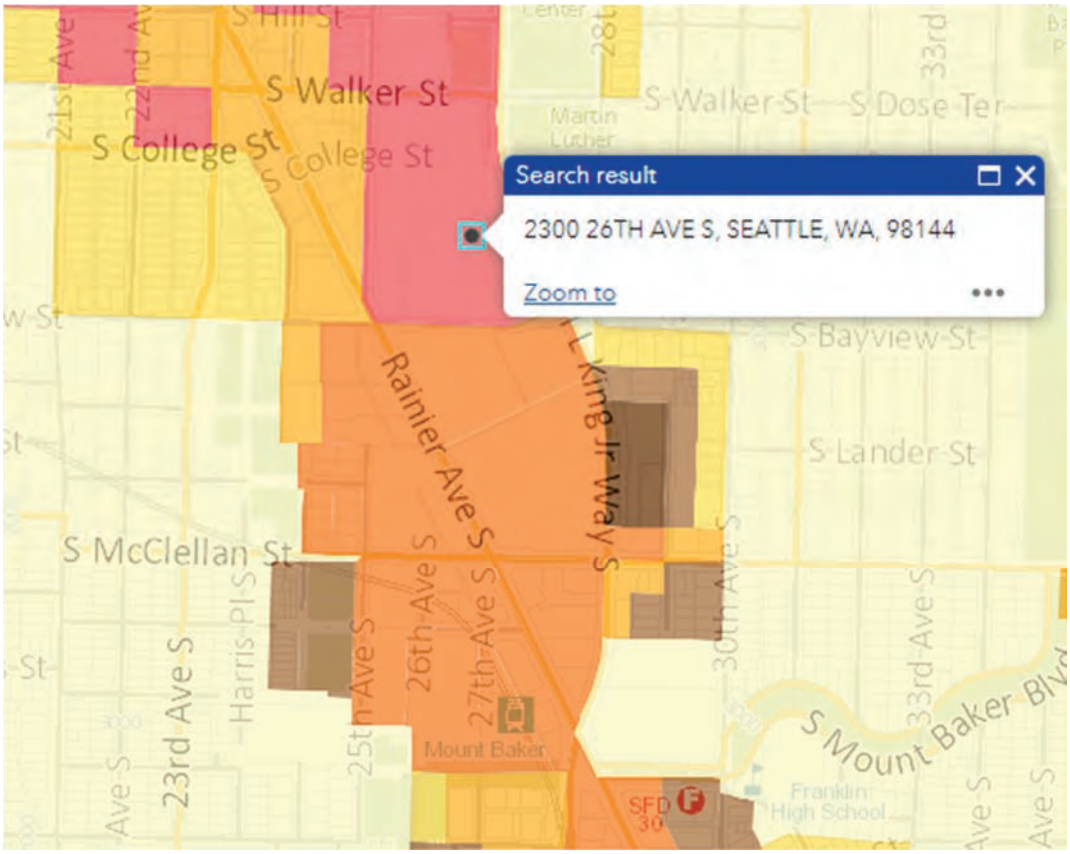
The Property (in yellow on the image to the right) is approximately 10 acres in size and currently houses single-story warehouse and office buildings constructed between 1953 and 1980, and surface parking. The Property is currently vacant. It is located just over a half-mile walking distance from the 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.

68-1



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).



68-1 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

Letter 69

May 6, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
Email: 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 1st 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").

69-1

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.

ipb Properties

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.

69-1 cont

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.

ipb Properties

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

Letter 70

McCULLOUGH HILL PLLC

May 6, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov

Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement

Dear Mr. Quirindongo,

70-1

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 15th 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

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 15th Avenue W.

70-1 cont

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

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

70-1 cont

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.

70-1 cont

Letter 71

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. 71-1

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
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 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov

Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement
Fremont Urban Center – Stone Way Property Owners' Comment

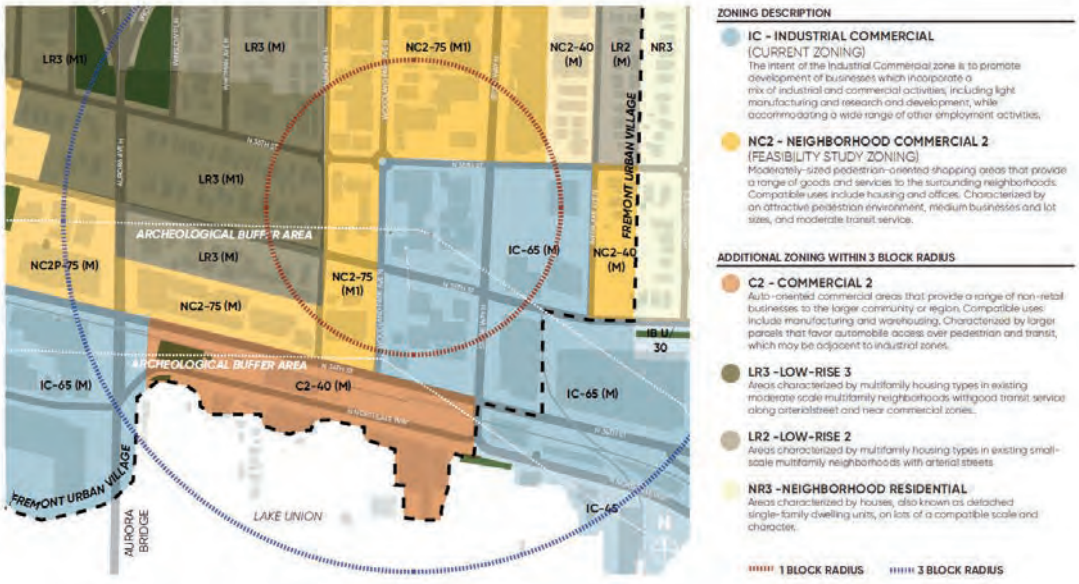
Dear Mr. Quirindongo,

We write as a coalition of property owners within the current Fremont Hub Urban Village located around Strone Way and N 35th Street. Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS"), maps, and policies.

71-1 cont

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.



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 type**s 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.

71-1 cont

Sincerely,

DocuSigned by:
Dennis Bruders
2024-May-02 | 13:06 PDT

Dennis Bruders

President

Bruders Ventures

Property Address:
1100 Nth 35th Street
Seattle, WA 98103

Sincerely,

William Ray, Managing Member
WRCRJV LLC
Owner of 3500 Stone Way North

Sincerely,

DocuSigned by:
Sonja Vonheim Condon

Sonja Vonheim Condon

President

ABC Enterprises, Inc.

Property Address:3525 Stone Way N.
Seattle, WA 98103

Sincerely,

DocuSigned by:
Robert Kleist
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
MRH Properties, LLC
206-618-1104
helenereed@comcast.net

Sincerely,

DocuSigned by:
Bryce Phillips
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:
2024-May-03 | 17:38 PDT

Georgia Rohlfing

Georgia Rohlfing

Dock Sportsbar & Grill

Property Address:
1102 North 34th
Seattle WA 98103

Sincerely,

Mark Magnussen

Owner of Stoneway Court, 3409 Stone Way N. Seattle, Wa 98103

71-1
cont

Letter 72

From: Candice Chevaillier
To: PCD_OneSeattleCompPlan; PCD_CompPlan_EIS
Cc: Rivera, Maritza; Strauss, Dan; 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

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. 72-1

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

-8 2:1547Ã7 ; 36893Ã0-*Ã#$%# "%Ä'-' Ä$,-! Ä(/!$ Ä)%#(.+-$$&)

May 1, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov

Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement
Fremont Urban Center – Stone Way Property Owners' Comment

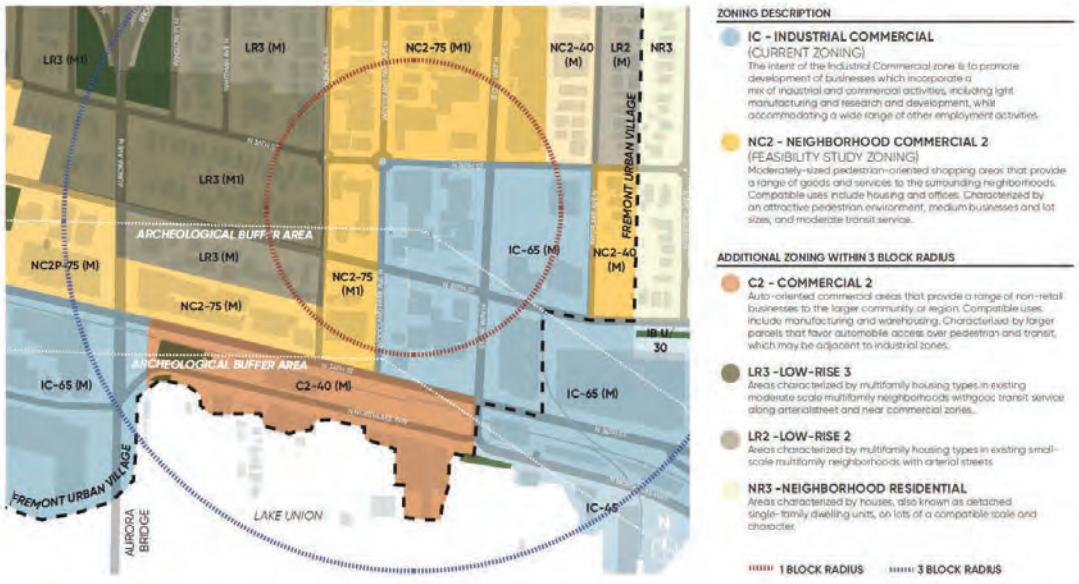
Dear Mr. Quirindongo,

We write as a coalition of property owners within the current Fremont Hub Urban Village located around Stone Way and N 35th Street. Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS"), maps, and policies.

72-1 cont

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.



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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 type**s 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.

72-1
cont

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Sincerely,

DocuSigned by:
PETER NORMAN
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

Letter 73

May 6, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov
Email: OneSeattleCompPlan@seattle.gov

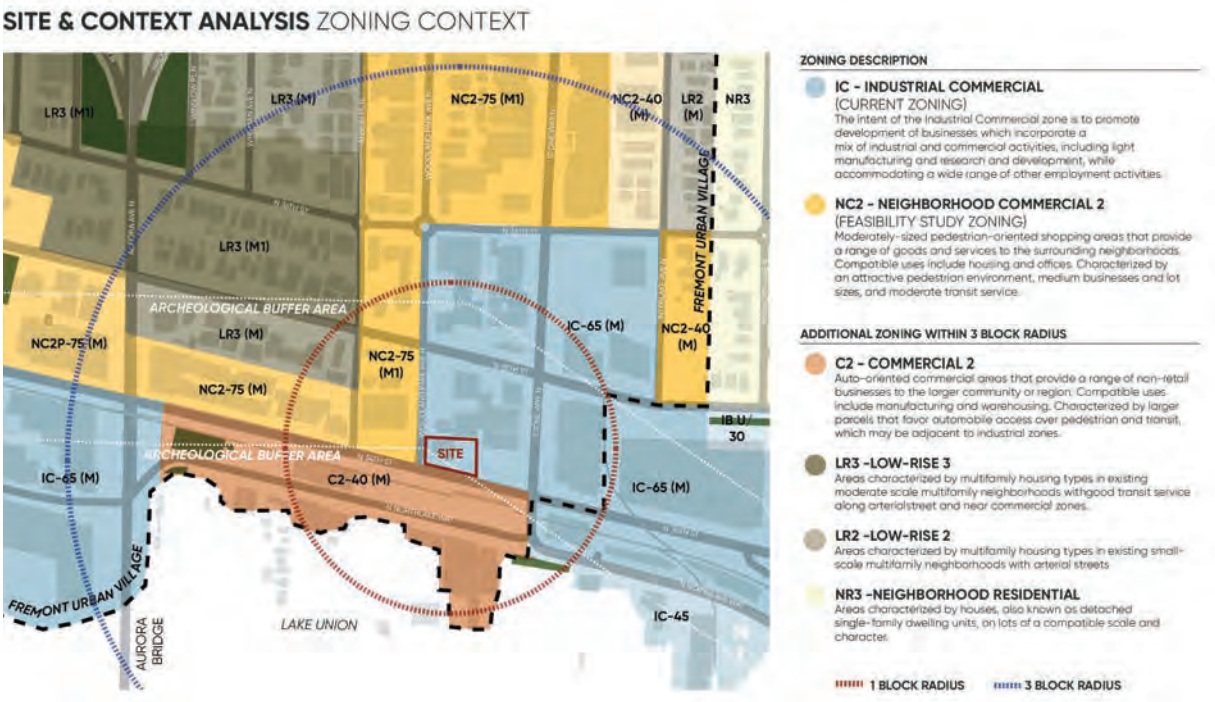
Re: One Seattle Comprehensive Plan Draft Environmental Impact Statement
1102 North 34th Street – Request for Fremont Urban Center Appropriate NC Zoning

Dear Mr. Quirindongo,

Along with my mother, I own the property at 1102 North 34th 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)

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.

73-1 cont

Sincerely,

s/Ula Rohlfing
Owner of 1102 North 34th Street

cc: Councilmember Rivera
Councilmember Strauss

Letter 74

HCMP Hillis Clark Martin & Peterson P.S.

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
oneseattlecompplan@seattle.gov;
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. 74-1

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).

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.

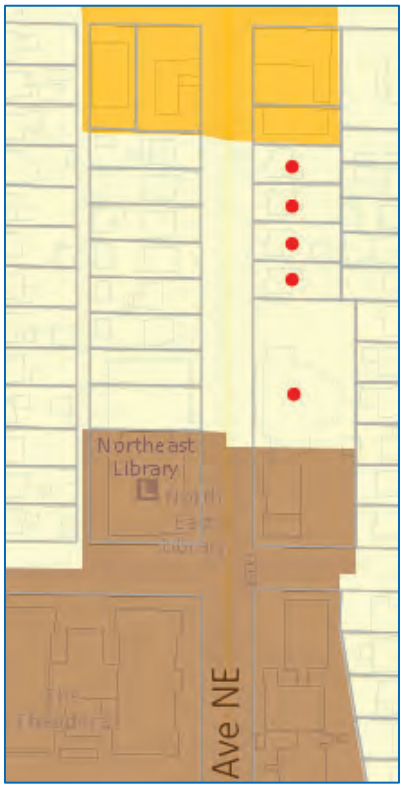


Figure 1. The Congregation's five properties (marked with red circles), with lowrise zoning shown in brown, neighborhood residential zoning showed in light yellow, and neighborhood commercial shown in mustard yellow.

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.[1]

74-1 cont

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.

[1] *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.

74-1 cont



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.

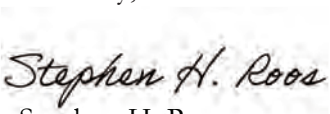
As part of feasibility study, the Congregation is currently evaluating whether to request a rezone of its four NR-3 zoned properties into NC1-40(M) zoning, to better match the Congregation's long-term needs and better align with the development pattern of its northerly neighbors.[2]

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

[2] 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.

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
Attorney for Congregation Beth Shalom

74-1 cont

CC: Marco Lowe, Chief Operating Officer

ND: 24307.002 4880-6097-7595v4

Letter 75

J. Selig Real Estate LLC
1000 2nd Avenue Suite 3210
Seattle, WA 98104

May 6, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov
Email: 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 15th 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. 75-1

I am Executive Vice President at Martin Selig Real Estate, LLC ("MSRE"), which owns, among other buildings, the 15th & Market Building in Ballard with over 200,000 sf. of office and commercial space.

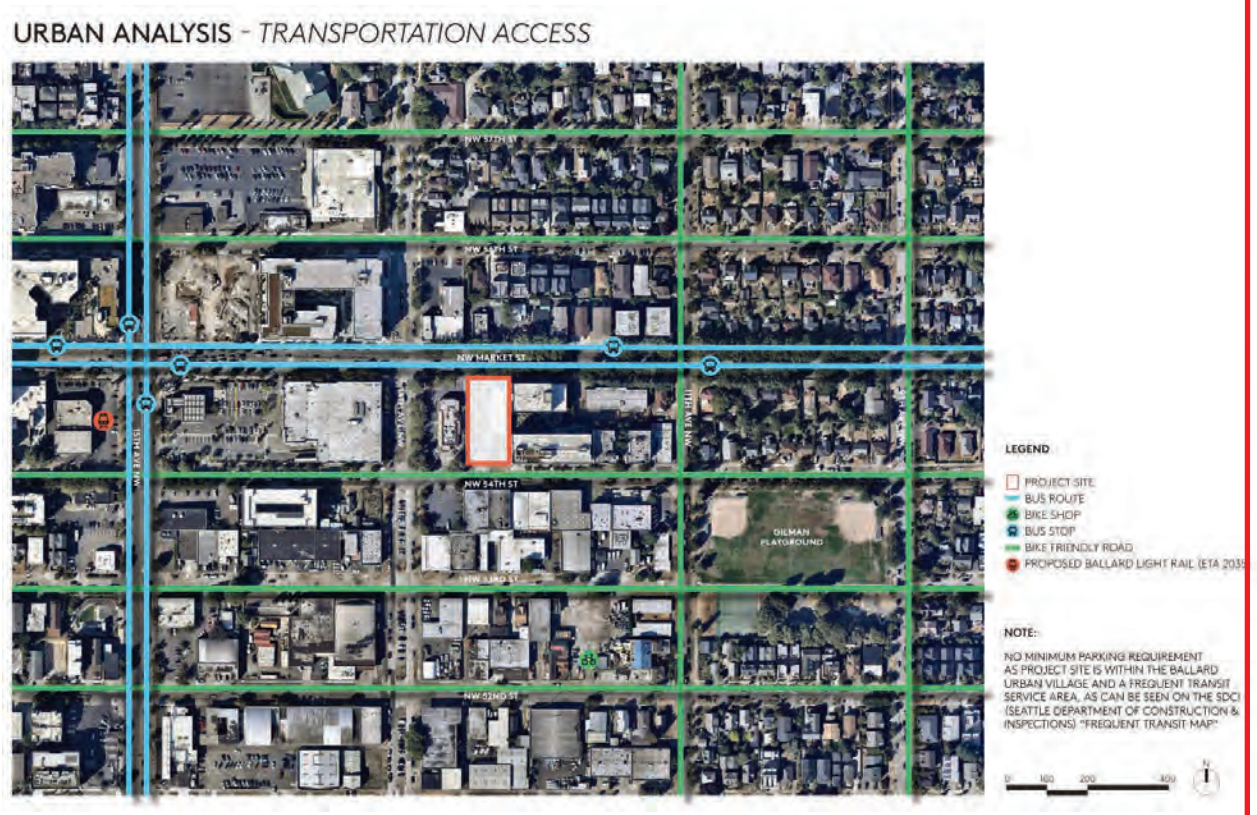
Specifically, our comments on the One Seattle Comprehensive Plan and DEIS are:

- **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

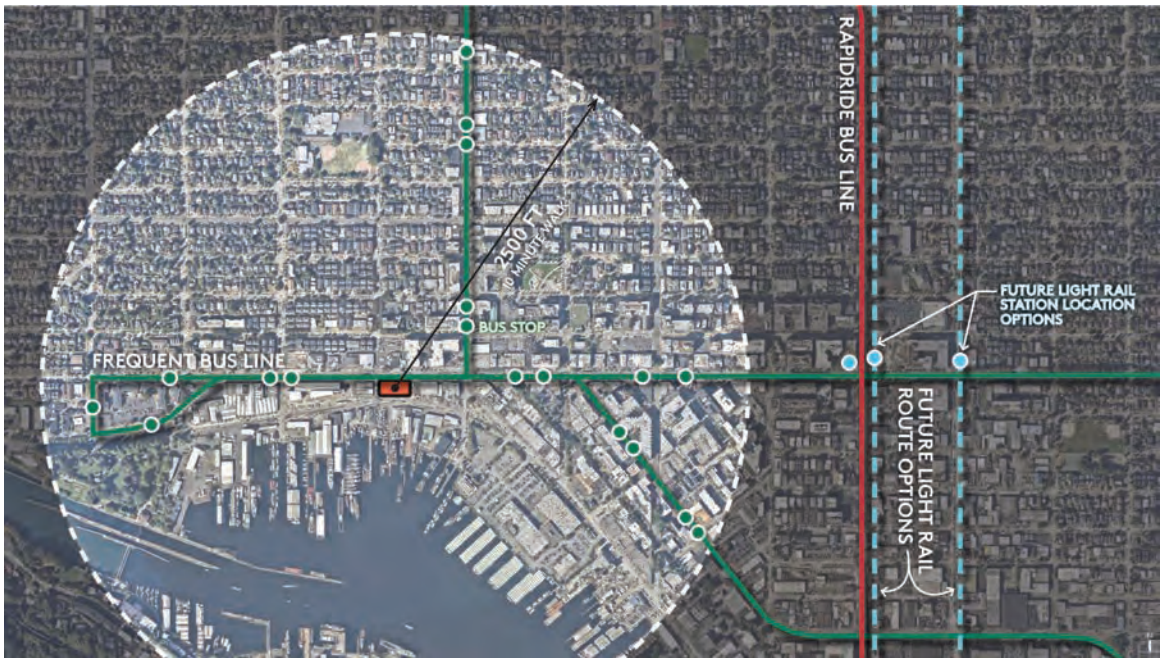
development opportunities on Market Street (see below). **The One Seattle Plan and Final EIS should study the potential for heights and densities of up to 240 feet around the walkshed of the future Ballard light rail station, including 1145 NW Market**. The City should ensure there is sufficient transit-oriented 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.

75-1 cont



- **15th & Market.** The current 15th & 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 15th & Market intersection supporting densities of 320+ feet.

- **2501 NW Market Street**. Located just east of 24th 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 24th Avenue along Market near the Nordic Museum**.



75-1 cont

- **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

Letter 76

May 23, 2024

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov

Re: 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.



76-1

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.

76-1 cont

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

Letter 77

CIM

May 3, 2024

VIA EMAIL

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: 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. 77-1

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.

77-1 cont

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

Sofia Tobar
Vice President, On-site Property Management
CIM Group

cc: Markham McIntrye, Office of Economic Development

balboa

Letter 78

May 1, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
Email: 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.

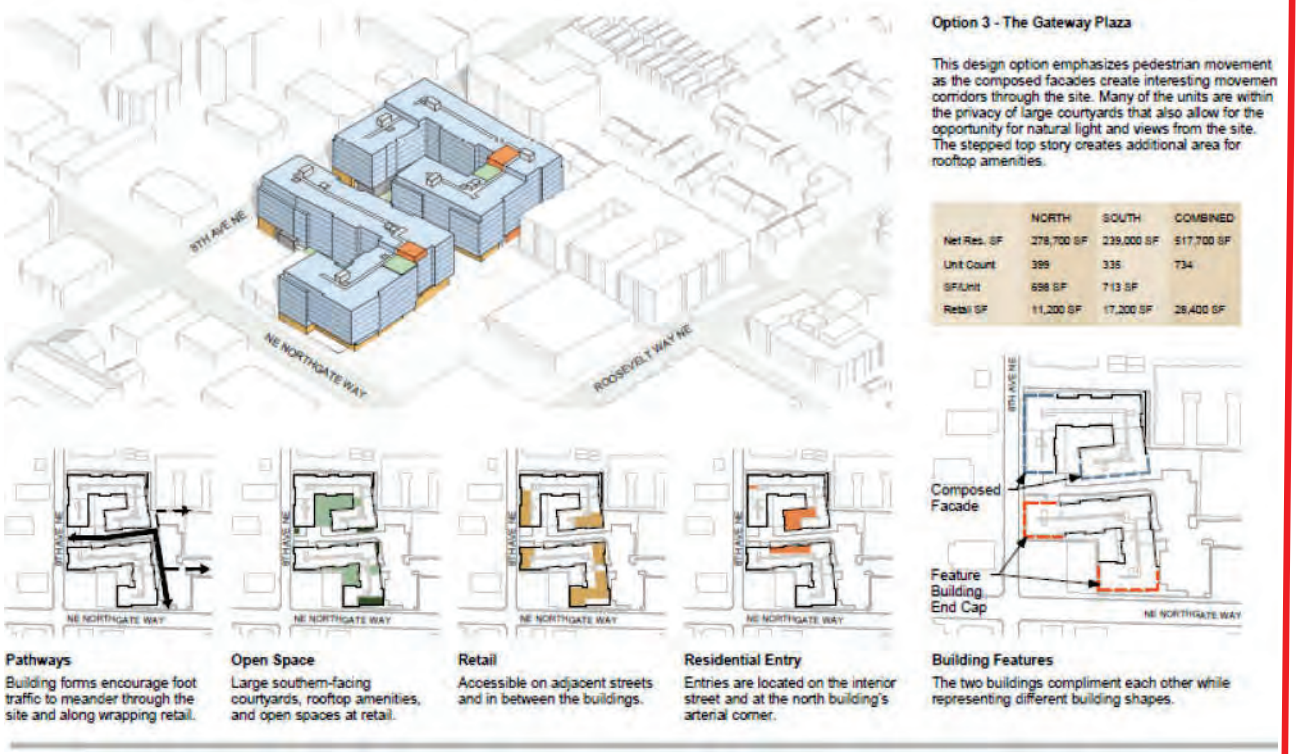
We believe 85-foot height this close to light-rail and on an arterial is wholly consistent with the Regional Center concept articulated in the Draft EIS. The Comprehensive Plan and Northgate Subarea Plan should prioritize high-density housing development on sites like the Property that will require significant investment to redevelop. 78-1

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.

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.



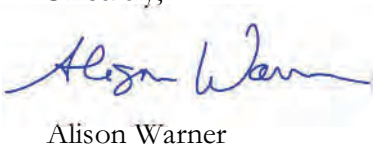
78-1 cont.

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 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

78-1
cont

Letter 79

May 20, 2024

VIA Email
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 47th Ave NE and 50th Ave NE (the "Property").[1] 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.[2] 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:

79-1

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.)

---

[1] Tax Parcel Nos. 601250-0080, 601250-0051, and 102504-9210.
[2] 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.

79-1 cont

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."[3]

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

[3] 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

Geoff Wood
gwood@windermere.com

79-1 cont

cc:
Jim Holmes, jim.holmes@seattle.gov

Letter 80

May 13, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Rico Quirindongo
Email: 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. 80-1

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

Letter 81

May 13, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
Email: 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 6th Avenue S. and 1022 6th 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.

81-1

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 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.

81-1 cont

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

Letter 82

May 14, 2024

VIA ELECTRONIC MAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
Email: 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 5th 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. 82-1

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-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.

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

Letter 83

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.” 83-1
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? 83-2
3. How will Seattle make progress towards its 30% canopy goal? How much public land is available to reach this goal?

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
Join us in fighting climate change from your inbox in 3 min every week.

Let's Connect!

Letter 84

From: Judy Akalaitis
To: PCD_CompPlan_EIS
Cc: Rivera, Maritza
Subject: Environmental Impact Question
Date: Sunday, May 5, 2024 9:39:18 PM

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.

84-1

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

Letter 85

From: Judy Akalaitis
To: PCD_CompPlan_EIS
Cc: Rivera, Maritza
Subject: EIS Question
Date: Sunday, May 5, 2024 9:48:34 PM

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. 85-1

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 84th St.

Judy Akalaitis
206.370.4176

Letter 86

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. 86-1

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 undersirable 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 2rd Ave NW is all residential now, no sidewalks, no bus service except 3 peak weekday morning & evening times, no commercial services.

- 8th Ave NW is the 2nd busiest street in Broadview with pedestrians, cars, bikes, trucks, you name the form of transportation, but it has no sidewalks.
- 8th 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?

86-1 cont

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 8th Ave NW
Seattle, WA 98177
(206) 371-2748

Letter 87

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

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?

87-2

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?

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. 88-1

Letter 89

DEIS StoryMap Comment

Name: Robin L Amadon

Email: Rlandy@comcast.net

Date: 5/5/2024

Comment:

88-1

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?

Letter 90

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? 90-1

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?

Letter 91

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 Urvan 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.

91-1

Robin Landy Amadon

Letter 92

From: Robin Amadon
To: PCD_CompPlan_EIS
Subject: Comment on Comprehensive Plan EIS
Date: Sunday, May 5, 2024 4:06:35 AM

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 Urvan 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

92-19 cont

Letter 93

From: Ken Anderson
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Monday, May 6, 2024 10:22:00 AM

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?

93-1

Sincerely,
Ken Anderson

--

Kenneth G. Anderson
Cell: 202-674-0404

Letter 94

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.

94-1

Letter 95

From: Anita Barcklow
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 8:29:51 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" 95-1
* 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

Letter 96

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 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? 96-1
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?
6bå) 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?

96-1 cont

Letter 97

From: Karen Barrett
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 3:04:51 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.

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"

97-1

* 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

Letter 98

From: Roniq Bartanen
To: PCD_CompPlan_EIS
Subject: Seattle"s Comprehensive Plan
Date: Monday, May 20, 2024 7:50:51 AM

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

98-1

www.shebirds.com

Happy Birding,
Roniq Bartanen (She/Her)
www.shebirds.com

Instagram: 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

Letter 99

From: Justine Barton
To: PCD_CompPlan_EIS
Subject: Comments on Seattle Comprehensive Plan Draft EIS
Date: Monday, May 6, 2024 2:24:30 PM

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: 99-1

* 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

Letter 100

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

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

Letter 101

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

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

Letter 102

From: PCD_OneSeattleCompPlan
To: Holmes, Jim
Subject: FW: Question/CommentOne Seattle Comp Plan"s DEIS --
Date: Wednesday, May 8, 2024 6:18:34 AM

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

Letter 103

May 23, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes; Rico Quirindongo
Email: PCD_CompPlan_EIS@seattle.gov

Re: Support for Alternative 5; Corridors Concept and multifamily development at 4822 S. Holly Street

Dear Mr. Quirindongo,

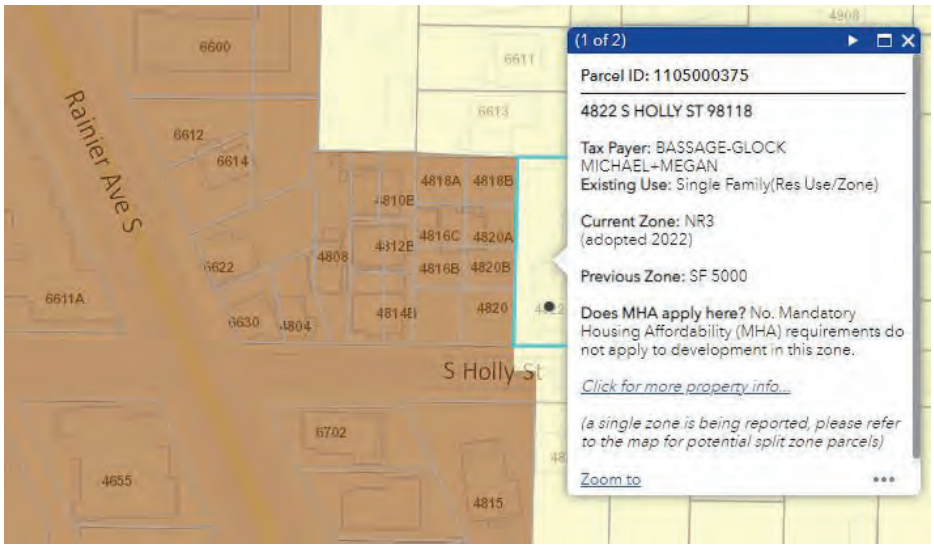
Thank you for the opportunity to comment on the One Seattle Comprehensive Plan Draft Environmental Impact Statement ("DEIS"). 103-1

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.



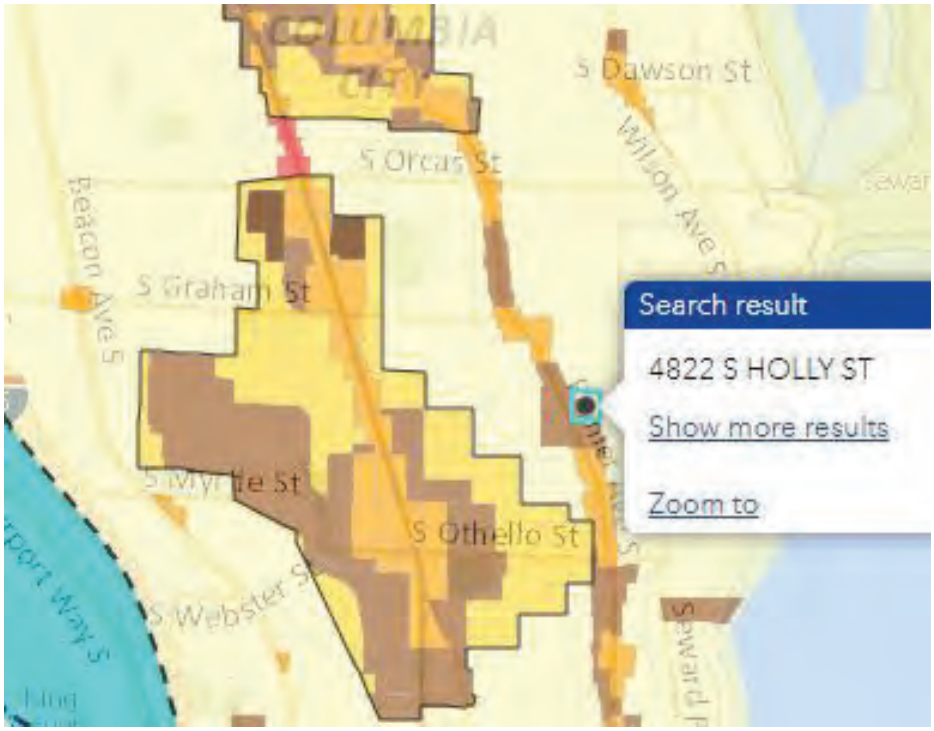
We own the property located generally at 4822 S. Holly Street ("Property") in the Rainier Valley neighborhood of Seattle. The Property is a 7200 square foot lot, shown below in yellow, that is currently only developed with our 960 square foot home. Our property is adjacent to townhomes to the west, and 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 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

103-1 cont

Letter 104

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 ___

104-1

In Green Lake in particular, I think that the plan should allow for high-rise apartments to provide affordable housing near a gem.

Letter 105

From: Joseph Beauregard
To: PCD_OneSeattleCompPlan; PCD_CompPlan_EIS
Cc: Harrell, Bruce; LEG_CouncilMembers; Sea Physi105
Subject: Comprehensive Plan
Date: Monday, April 8, 2024 8:56:50 AM

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 apparel 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. 105-1

-- 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 Vrbos.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

105-1
cont

Letter 106

From: Joseph Beauregard
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

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.

106-1

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 Beauregard

https://www.seattletimes.com/business/hawaii-lawmakers-take-aim-at-vacation-rentals-after-lahaina-wildfire-amplifies-maui-housing-crisis/

Letter 107

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.

107-1

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. *S*ection 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

Letter 108

From: Arnold Bendich
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 7:34:34 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). 108-1

* 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.

Arnold Bendich
jebendich@comcast.net
1754 NE 62nd St
Seattle, Washington 98115-6821

Letter 109

Judith Bendich
1754 NE 62nd St.
Seattle, WA 98115
May 6, 2024

To: OneSeattleCompPlan@seattle.gov
To: PCD_CompPlan_EIS@seattle.gov
cc: Bruce.Harrell@seattle.gov , 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.[1]

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

[1] 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.

109-1 cont

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 loser 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.

109-1 cont

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:

109-2

- 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.

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. 109-2 cont

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.[2] 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

[2] 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.

109-2 cont

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 rede-signed 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.

109-2 cont

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.[3]

[3] 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.

109-2 cont

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

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.

Letter 110

From: Ericka Berg
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 6:44:41 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).

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* 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" 110-1
* 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

Letter 111

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

Letter 112

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. 112-1

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.

Letter 113

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

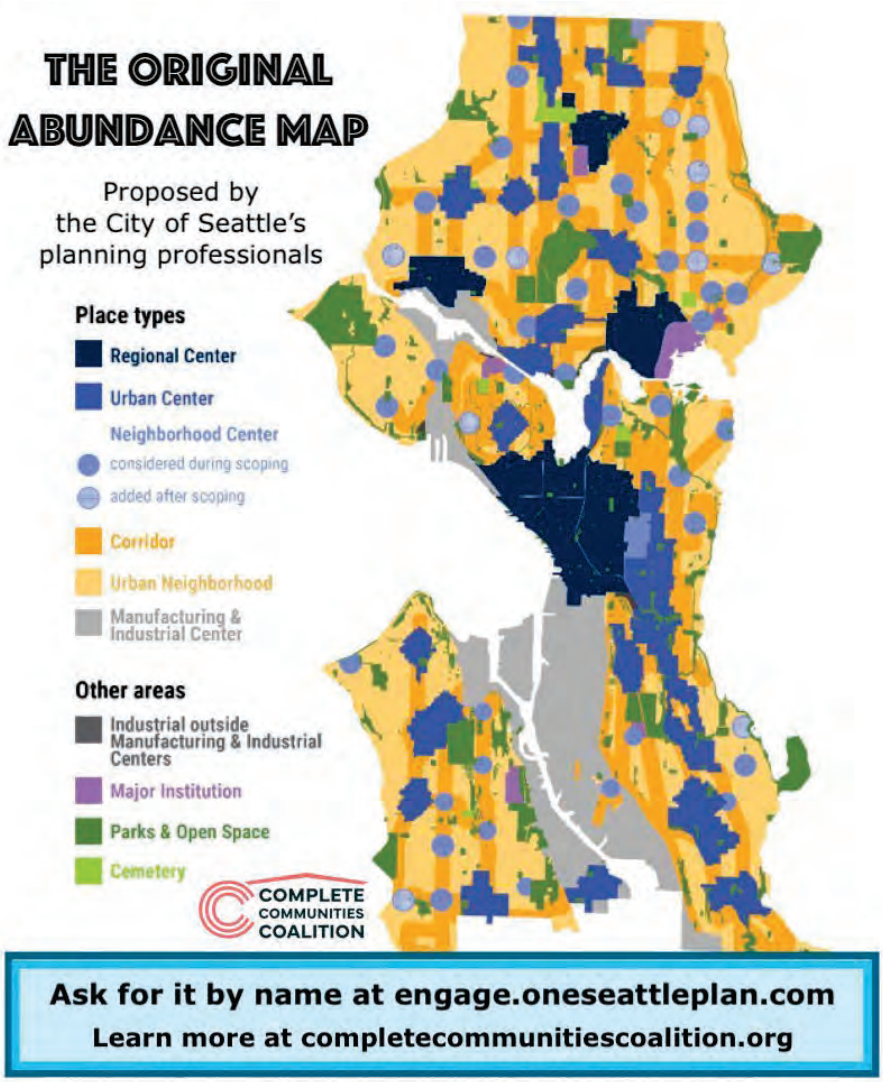
Letter 114

From: Scott Berkley
To: PCD_OneSeattleCompPlan; PCD_CompPlan_EIS
Subject: Comp Plan Comments
Date: Saturday, May 4, 2024 4:47:33 PM

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. 114-1
- 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.



Demographics:
Male, White, 35-44, live and work in Seattle, 98126

Thank you,
Scott Berkley

114-1
cont

Letter 115

From: Jo Berliner
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Sunday, May 5, 2024 1:43:20 PM

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? 115-1

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,

Jo Berliner
Seattle resident (98115)

--
Jo Berliner
pronouns: he/they

Letter 116

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

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. 116-1

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

Letter 117

From: Neisha
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Saturday, May 4, 2024 9:31:06 PM

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.

117-1

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.” 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

Letter 118

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. 118-1

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.

eva Bhagwandin
eva.neisha@gmail.com
515 Ne 86th St
Seattle, 98115

Letter 119

From: Khai Bhagwandin
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 1:49:36 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.

119-1

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.

Khai Bhagwandin
khaibhagwandin@gmail.com
515 NE 86TH ST
Seattle, Washington 98115

Letter 120

From: Samuel Bhagwandin
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 3:28:03 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.

120-1

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.

Samuel Bhagwandin
sgbhagwandin@hotmail.com
515 NE 86th Street
Seattle, Washington 98115

Letter 121

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

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? 121-1

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,
Ethan Bickel
Seattle, WA 98112

Letter 122

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. 122-1

Please more trees.

Mary Bicknell

98105

Letter 123

From: Bonnie Bledsoe
To: PCD_CompPlan_EIS
Subject: Comments of draft EIS
Date: Sunday, May 5, 2024 9:55:01 PM

CAUTION: External Email

I have some concerns regarding the Evironmental 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?

123-1 cont

- 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

Letter 124

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

Letter 125

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

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. 125-1

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

125-1 cont

Letter 126

From: Robert Blumenthal
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 6:39:26 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.

126-1

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.

Robert Blumenthal
rblument@comcast.net
2812 NE 62nd St.
Seattle, Washington 98115

Letter 127

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.** 127-1

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 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.

127-2 cont

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 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.

127-2 cont

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

Letter 128

From: 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

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

Letter 129

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. 129-1

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

Letter 130

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. 130-1

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.

Patrick Brady
pcmbrady@gmail.com
318 29th Ave E
Seattle, Washington 98112

Letter 131

From: Patti Brandt
To: Woo, Tanya; 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:
H*ow 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

Letter 132

From: Brooke Brod
To: PCD_CompPlan_EIS
Subject: Seattle Comp Plan DEIS Comments
Date: Sunday, May 5, 2024 8:59:41 PM

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. 132-2
- 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.

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/

Letter 133

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

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. 133-1
- 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?

Thank you for your consideration.

Barbara Broderick
3911 NE 82nd St.
Seattle, WA 98115

Letter 134

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. 134-1

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

Letter 135

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. 135-1

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.

Letter 136

From: Ellen Braun-Kelly
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:05:20 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.

136-1

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.

Ellen Braun-Kelly
embkelly@comcast.net
10623 Exeter Ave NE
Seattle, Washington 98125

Letter 137

From: Ellen Braun-Kelly
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 8:47:41 AM

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

137-1

Ellen Braun-Kelly
embkelly@comcast.net
10623 Exeter Ave NE
Seattle , Washington 98125

Letter 138

From: Beth Brunton
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 11:50:01 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.

138-1

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.

Beth Brunton
bebrunton@hotmail.com
1900 28th ave s
Seattle, Washington 98144

Letter 139

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

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

Letter 140

From: Cedar Bushue
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 4:07:32 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.

140-1

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.

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

Letter 141

From: Michael Byrd
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Tuesday, May 7, 2024 7:47:01 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. 141-1

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.

Michael Byrd
byrd4646@msn.com
414 Malden ave E, E
Seattle, Washington 98112

Letter 142

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

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.

142-1

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.

Letter 143

From: 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. 143-1

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.

Letter 144

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. 144-1

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.

Patricia Cannon
pattycannon@gmail.com
8160 21st Ave NE
Seattle, Washington 98115

Letter 145

From: A C
To: PCD_CompPlan_EIS
Subject: Bring back alternative comprehensive plan 5!
Date: Sunday, May 5, 2024 1:00:59 AM

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. 145-1

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

Letter 146

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. 146-1

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

From: Erica Carre
To: PCD_CompPlan_EIS
Subject: Seattle Comp Plan/130th Station Rezone
Date: Monday, May 6, 2024 12:18:29 PM

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

Letter 147

From: Mal Carter
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Saturday, May 4, 2024 10:29:05 PM

CAUTION: External Email

To whom it may conern,

Please note my comment on the DEIS:

147-1

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.” 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

Letter 148

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.

148-1

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.

Jovi Catena
jovicatena1@gmail.com
8507 s. 115th st
Seattle, Washington 98178

Letter 149

From: Christine Cave
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 6:01:54 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. 149-1

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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* 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.

Christine Cave
cmcave@aol.com
735 N 72nd
Seattle, Washington 98103

Letter 150

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. Tree's 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!! 150-1

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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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.

Meg Chadsey
mschadsey@gmail.com
3629 Bagley Ave N
Seattle, Washington 98103

Letter 151

From: Meg Chadsey
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 13, 2024 8:11:16 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

151-1

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. Tree's 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.
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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.

Meg Chadsey
mschadsey@gmail.com
3629 Bagley Ave N
Seattle, Washington 98103

Letter 152

From: mtl2bk@gmail.com
To: PCD_CompPlan_EIS
Subject: Seattle Comprehensive Plan Comment
Date: Wednesday, April 17, 2024 8:33:35 AM

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.

152-1

Wishing for more practical thinking!
Kind regards,
Marc Charbonneau

Letter 153

From: Marcos Chavez
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:24:45 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.

153-1

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.

Marcos Chavez
marcoschavez43@gmail.com
818 NE 106th St, Apt 211
Seattle, Washington 98125

Letter 154

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. 154-1

If the City of Seattle adopted my above proposed changes, then we would be able to create a more affordable city for everyone.

Letter 155

From: Wendy Church
To: PCD_CompPlan_EIS; Morales, Tammy
Subject: EIS, questions
Date: Friday, May 3, 2024 8:21:49 AM

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?** 155-1

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?**

***

Wendy Church, PhD
wendyschurch.com
@wendychurchwriter





Letter 156

From: Robert Clabough
To: PCD_CompPlan_EIS
Subject: Comp Plan Comments
Date: Thursday, May 16, 2024 9:04:48 PM

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. 156-1

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

Letter 157

From: Lisa Clark
To: LEG_CouncilMembers; PCD_CompPlan_EIS
Subject: Tree protection with density
Date: Saturday, May 4, 2024 7:10:49 AM

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

Letter 158

From: Lisa Clark
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 6:30:32 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.

158-1

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.

Lisa Clark
lisaclarklisaclark@gmail.com
PO Box 23286
Seattle, Washington 98102

Letter 159

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

CAUTION: External Email

Mr. Holmes,

I inadvertently sent the email below to the wrong address. Hopefully I got it right this time.

159-1

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.

159-1 cont

Thank you for the opportunity to comment.

Dave Clark
4005 NE 60th Street
Seattle, WA 98115

206-817-8569 (cell)

Letter 160

From: Linda Clifton
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 10:28:12 AM

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. 160-1

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 wholeheatedly 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:

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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.

Linda Clifton
lclifton1@mindspring.com
4462 Whitman Ave N - Upper
Seattle , Washington 98103

Letter 161

DEIS StoryMap Comment

Name: Travis Close

Email: travis.close@gmail.com

Date: 4/8/2024

Comment:

161-1

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.

Letter 162

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

Letter 163

From: Ashley Cohen-Lewe
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Sunday, May 5, 2024 2:27:17 AM

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?

163-1

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,

Ashley Cohen-Lewe
Anything But Ordinary

Letter 164

May 18, 2024

To: OneSeattleCompPlan@seattle.gov
To: PCD_CompPlan_EIS@seattle.gov
cc: Bruce.Harrell@seattle.gov , 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.

164-1 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.

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."

164-2

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:

164-2 cont

- 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.

164-3

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.

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:

164-4

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.

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.

164-4 cont

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 need 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

164-4 cont

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.

164-4 cont

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

Letter 165

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. 165-1

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

Letter 166

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. 166-1

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 9th Ave NE
Seattle WA 98105
mocramer@hotmail.com

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
oneseattlecompplan@seattle.gov;
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.

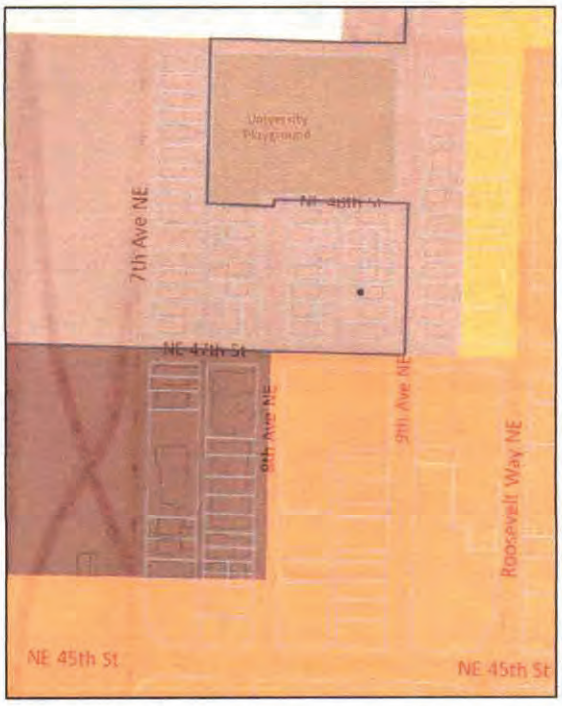


Figure 1. Current zoning surrounding my property. Light brown is low-rise, mustard yellow is neighborhood commercial, orange is Seattle Mixed, and darker brown is mid-rise.

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.[1] That result flies in the face of the Mayor's goals. 166-1 cont

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.**

---

[1] *See* 2022 Comprehensive Plan at page 41.

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 Cramer

166-1 cont

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)

Letter 167

From: Beverly Crocker
To: PCD_CompPlan_EIS
Cc: Rivera, Maritza
Subject: Environmental Impact statement
Date: Thursday, May 2, 2024 8:24:56 PM

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? 167-1

Thank you,
Beverly Crocker

Letter 168

From: Beverly Crocker
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 11:59:38 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.

168-1

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.

Beverly Crocker
beverly.canada@gmail.com
5540 37th Ave NE
Seattle, Washington 98105

Letter 169

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

CAUTION: External Email

Office of Planning and Community Development

Re: One Seattle Comprehensive Plan and draft Environmental Impact Statement

169-1

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 wholehearted 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.

169-1 cont

Thank you for considering my comments,

Carolyn Crockett
13034 1st Ave NE
Seattle, WA 98125-3005
(206) 363-9527
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?

169-1 cont

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.

Letter 170

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

Letter 171

From: Ethan Macey-Cushman
To: PCD_CompPlan_EIS
Subject: This doesn"t go FAR enough
Date: Friday, March 29, 2024 4:52:30 PM

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

Letter 172

From: 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

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

Letter 173

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

Letter 174

From: 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. 174-1

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

Letter 175

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. 175-1

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 displaces 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.

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

175-1 cont

Letter 176

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 Managment Plan should be called out as mitigation for transportation impacts which the EIS predicts will be significant under all five alternatives.

176-1

Letter 177

From: Deborah Davis
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Tuesday, May 7, 2024 9:34:40 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).

177-1

* 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.

Deborah Davis
davis122@gmail.com
7715 1st Ave NE
Seattle, Washington 98115

Letter 178

From: Courtney Davis
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 6:06:29 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).

178-1

* 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.

Courtney Davis
cdavis622@gmail.com
1232 S State Street
Tacoma, WA 98405

Letter 179

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

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.

Letter 180

From: Gabriel-Bello Diaz
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 11:33:18 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).

180-1

* 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.

Gabriel-Bello Diaz
gabrielbellodiaz@gmail.com
707 South Snoqualmie Street, 1D
Seattle, Washington 98108

Letter 181

From: Mary Lou Dickerson
To: PCD_CompPlan_EIS
Subject: Question
Date: Saturday, May 4, 2024 11:13:57 AM

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

Letter 182

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 is impervious surfaces will increase runoff. What measures will be taken to prevent flooding streets and buildings and the scouring of receiving creek beds? 182-1
- 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 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.

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 97th St
Seattle, WA 98115
chucklesd2@hotmail.com
206 683-5283

Letter 183

From: Jill Doran
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Monday, May 6, 2024 3:10:17 PM

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. 183-1

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

Letter 184

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

Letter 185

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
oneseattlecompplan@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. 185-1

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

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[1] and 23.34.013.[2] 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").

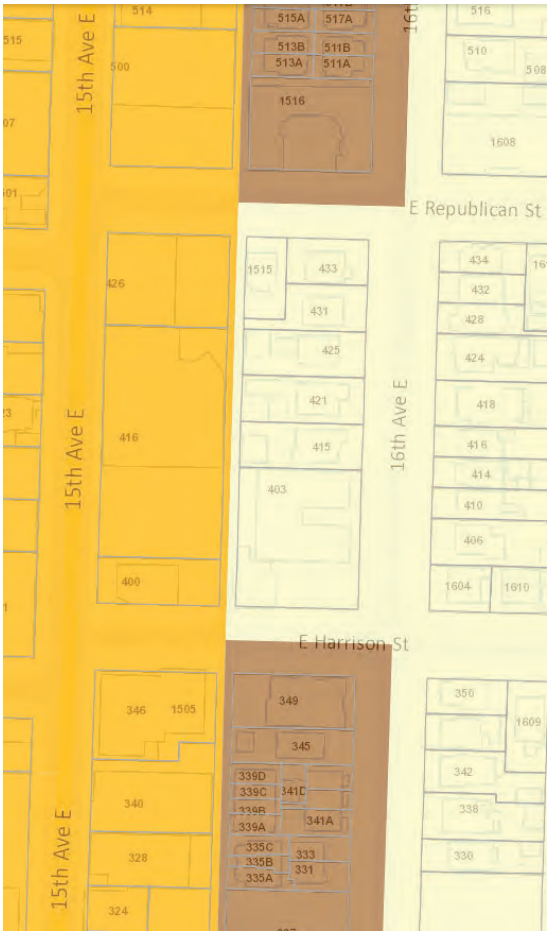


Figure 1. Current zoning of vicinity surrounding our homes. Light yellow properties are zoned NR3 and light brown properties are zoned LR3(M). Mustard yellow properties are zoned NC2-55(M), with a pedestrian designation in most circumstances.

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.

185-1 cont

[1] "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."

[2] "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.*

185-1 cont

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.

185-2

- 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[3] and 23.34.013.[4] 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

---

[3] "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."

[4] "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

185-3 cont

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." **185-3 cont**

- 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."

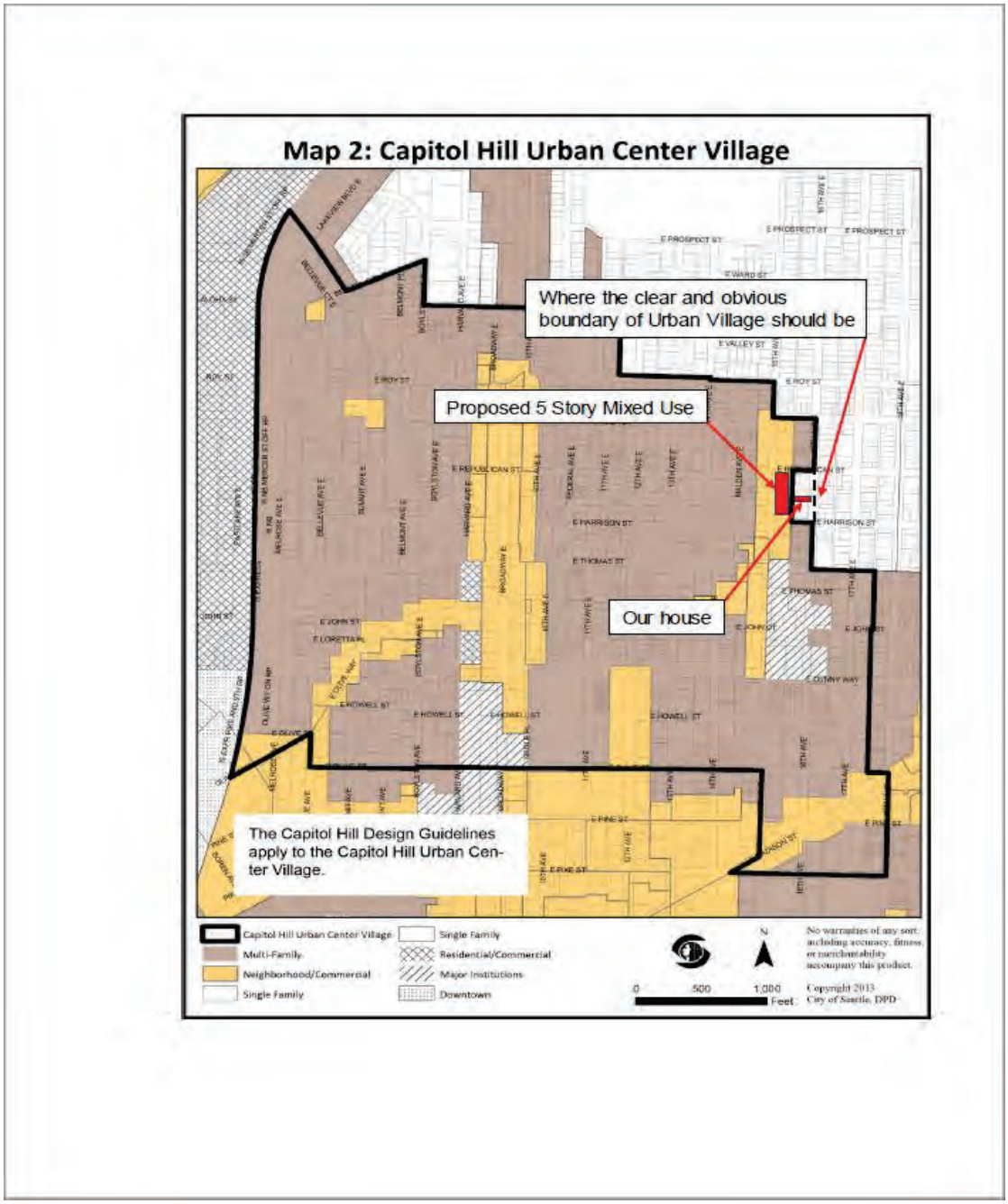
- At 3.6-162, "Similar to Alternative 2, urban neighborhood areas that are currently primarily 1- and 2-story buildings would be allowed to develop up to 4- to 5-story buildings, especially on larger lots and lots that are adjacent to more densely zoned areas."

- 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).



185-3 cont


16th Ave East Housing block
These 6 houses are carved out of any rezone
Legend
415 16th Ave E
These six houses are the only single family zoned properties between Madison and Mercer on the west side of 16th Ave E.
Proposed Hunter Capital development. 55' height with underground parking via adjoining alley
The Gables multifamily Coop
415 16th Ave E
Google Earth
N
300 ft

185-3 cont

Letter 186

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

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.

186-1

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

Letter 187

May 6, 2024

VIA EMAIL

Office of Planning and Community Development
Seattle City Hall
600 4th Avenue, 5th Floor
Seattle, WA 98104
Attn: Jim Holmes
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 26th 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 26th 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. 187-1

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 15th Avenue on Capitol Hill, and the east side of 34th 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.

187-1 cont

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

Letter 188

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 85th 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 <u>in Seattle proper</u>?**

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 82nd St
Seattle, WA 98103
206-353-7265

Letter 189

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.

189-1

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.

189-1 cont

2nd 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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Letter 190

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.

190-1

Letter 191

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

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. 191-1

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 tp 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 my seem like a small thing but I believe it is very important

Thank you for considering,
Eli Edlund
9917 15th AVE NW
Seattle 98117

Letter 192

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

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?

192-1

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.

Letter 193

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:

193-1

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

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.

193-1 cont

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 85th 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***.

193-2

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.

193-2 cont

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 I consideration s 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.

193-3

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.[4] 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[5]

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.[6] 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.

193-4

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.

193-4 cont

"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

---

[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

[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/

Letter 194

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

194-1

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 Accessary 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.”

194-1 cont

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.

194-1 cont

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

Richard Ellison
climbwall@msn.com
8003 28th Ave NE
Seattle, Washington 98115-4639

Letter 195

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

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

Letter 196

From: Joren Estrada
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 4:52:23 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).

196-1

* 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.

Joren Estrada
joren.estradaaa@gmail.com
1158 N 91st St Apt 404
Seattle, Washington 98103

Letter 197

From: stevi.exit@gmail.com
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Important Comment on DEIS
Date: Monday, May 6, 2024 12:28:02 PM

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? 197-1

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

Letter 198

From: Carol Fahrenbruch
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 3:22:14 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).
* 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.

198-1

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

Letter 199

From: andrea Faste
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:35:02 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. 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).

199-1

* 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.

andrea Faste
amfaste@comcast.net
7713 11th Av NW
Seattle, Washington 98117

Letter 200

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

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
Changing our culture of consumption and reclaiming stewardship

Letter 201

From: Nico Faz
To: PCD_CompPlan_EIS
Subject: DEIS Comments
Date: Monday, May 6, 2024 5:00:10 PM

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.

201-1

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

Letter 202

From: Rob Fellows
To: PCD_CompPlan_EIS
Subject: One Seattle Plan DEIS comment
Date: Monday, May 6, 2024 3:57:23 PM

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.

202-1

Rob Fellows
115 N 84th St.
Seattle, WA 98103

Letter 203

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

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? 203-1

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?

Letter 204

From: Kaeli Fertal
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 7:45:42 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.

204-1

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

Letter 205

From: Julia Field
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 10:02:22 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).

205-1

* 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.

Julia Field
1juliafield@gmail.com
2034-A NW 60th St
Seattle, Washington 98107

Letter 206

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

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.

206-1

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

Letter 207

From: mark a. foltz
To: PCD_CompPlan_EIS
Subject: Comments on Seattle Comprehensive Plan DEIS
Date: Sunday, May 5, 2024 9:51:02 PM

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. 207-1

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

Letter 208

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

Letter 209

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.
* 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.

209-1

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

Letter 210

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." 210-1

* 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.

* 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

Letter 211

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 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.

211-1 cont

Thanks for your time and all of your hard work. Onward!

Josh Friedmann
(206) 412-6316

Letter 212

From: Barbara Fristoe
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 5:55:16 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.

212-1

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.

Barbara Fristoe
bfristoe@mac.com
3418 16th Ave S
Seattle , Washington 98144

Letter 213

From: Michelle Gadeken
To: PCD_CompPlan_EIS
Subject: Seattle One Comprehensive Plan feedback
Date: Tuesday, April 2, 2024 11:30:04 AM

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

Letter 214

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?

214-1 cont

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

Letter 215

From: Mark Ghiorso
To: PCD_CompPlan_EIS
Cc: Rivera, Maritza
Subject: Questions reenvironmental impact statement
Date: Monday, May 6, 2024 4:56:43 PM

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.

215-1

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 Ghiorso
7336 24th Ave NE
206 550-1850

Letter 216

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.

216-1

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.

Letter 217

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. 217-1

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.

Letter 218

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. 218-1

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.

Letter 219

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 (MTCO2e) 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/

219-1

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

219-1 cont

Letter 220

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

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 18th avenue south 98108

Letter 221

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

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. 221-1

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?

221-1 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:

- 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

Letter 222

From: J G
To: PCD_CompPlan_EIS; Strauss, Dan
Subject: D6 comments
Date: Sunday, May 5, 2024 10:59:21 AM

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. 222-1

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

Letter 223

From: Jennifer Godfrey
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 7:31:22 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.

223-1

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

Letter 224

From: Demian Godon
To: PCD_CompPlan_EIS
Subject: Comp Plan draft
Date: Monday, May 20, 2024 7:00:02 PM

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

Letter 225

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 225-2

3. For all Alternatives, please study providing high-rise zoning immediately adjacent to all light-rail stations (within 1000 feet or 1/8th 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 225-3

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.

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 145th station area to include the same distance from the station in the station area as is include in the 130th 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 45th 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 65th or NE 75th 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.

225-3 cont

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

225-3 cont

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 145th St
    c. Greenwood Ave N / N 125th St
    d. 15th Ave NW / NW 100th St
    e. 32nd Ave NW / NW 85th St
    f. 3rd Ave NW / N 80th St
    g. 8th Ave NW / NW 70th St
    h. Phinney Ave N / N 60th St
    i. Fremont Ave N / N 43rd St
    j. NW Market St between 8th Ave NW and 3rd Ave NW
    k. 24th Ave NW / NW 80th
    l. 32nd Ave NW / NW 65th
    m. Phinney Ave N / N 46th St
    n. 32nd Ave W / W Government Way
    o. 6th Ave W / W McGraw St
    p. 10th Ave W / W Howe St
    q. Queen Anne Ave N / Nickerson St
    r. Wallingford Ave N / N 37th St
    s. Wallingford Ave N / N 40th St
    t. Wallingford Ave N / N 34th St
    u. 1st Ave NE / NE 50th St
    v. Lakeside Ave / Lake Washington Blvd
    w. MLK Jr Way / E Union St

x. 34th Ave W / W Emerson St
y. 35th Ave NE at all intersections not included in an Urban Center (55th, 65th, 75th, 85th, and 95th)
z. Sand Point Way between NE 95th St and NE 97th
aa. 5th Ave NE / NE 83rd St
bb. West Seattle Water Taxi Station
cc. Alki Ave SW between 63rd Ave SW and 61st Ave SW
dd. California Ave SW / SW Charlestown St
ee. Beach Dr SW / SW Anderson St
ff. 35th Ave SW / SW Kenyon St
gg. 35th Ave SW / SW Roxbury St
hh. 9th Ave SW / SW Henderson St
ii. Highland Park Way S / SW Kenyon St
jj. 35th Ave SW / SW 106st
kk. 31st 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. 50th Ave S / S Genesee St
qq. 15th Ave S / S Columbian Way
rr. 15th 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 / 72nd 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 intend 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 it's 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

225-3 cont

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

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

225-4

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 ¾ 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.

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.

75. 2-56: please correct this section to acknowledge that delaying action would also put the City in non-compliance with state requirements.

225-4 cont

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.

77. 3.1-16: revise Alternatives to increase density in areas ranked either 4, 3, 2, or 1 in terms of Burden Levels

225-5

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

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

225-6

3.3 Plants & Animals

83. 3.3-5: why are tree management units by zone type and not by Subarea?

84. 3.3-8: please provide additional information that makes it clear that 6PPD-quinone originates from tires

225-7

3.4 Energy & Natural Resources

85. 3.4-7: Please provide a comparative Building EUI for single-family homes based on existing energy data

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

225-8

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.

225-10

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 130th as compared to 15th & 145th even though they are the same Place Type?

97. 3.6-139: please condense all zoning at 15th & 145th 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 15th & 145th.

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.

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.

225-11

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.

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.

225-12

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.

225-14

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.

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:

a. The Department of Commerce HB 1110 Model Ordinance for cities 25,000 and over
b. The Urban Institute's Research Report – Unifying Upzoning with Affordable Housing Production Strategies: Advancing Access to Housing in Washington State
c. The American Enterprise Institute's Research Report – Expanding Housing Supply with Light-Touch Density: City of Seattle Case Study
d. The Seattle Planning Commission Issue Brief – Growth Strategy (February 2022)
e. The Seattle Planning Commission Issue Brief – Anti-Displacement (March 2022)
f. The Seattle Planning Commission Issue Brief – Repurposing the Right-of-Way (November 2022)
g. 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)

225-15 cont

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.

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?

225-16

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?

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

Letter 226

From: Suzanne Grant
To: PCD_CompPlan_EIS
Subject: One Seattle Plan comments
Date: Monday, May 6, 2024 2:10:26 PM

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. 226-1

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.

226-1 cont

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

Letter 227

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:

227-1

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

Letter 228

From: Emily Green
To: PCD_CompPlan_EIS
Subject: Seattle One Plan feedback
Date: Friday, April 26, 2024 5:02:16 PM

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.

228-1

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

Letter 229

DEIS StoryMap Comment

Name: Connor Griffin

Email: griffin75006@gmail.com

Date: 4/22/2024

Comment:

I'd like to se 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

Letter 230

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

Letter 231

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 enters to 1/4 mile radius instead of 800 feet and 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

Letter 232

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 oportunity 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 aprtment 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

Letter 233

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

Letter 234

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

Letter 235

From: Jonah Griffith
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 12:57:12 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.

235-1

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.

Jonah Griffith
jonah@objectcreative.com
7331 21st Ave NW
Seattle, Washington 98117

Letter 236

From: Katy Griffith
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 4:05:50 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.

236-1

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.

Katy Griffith
katygr@msn.com
2131 N 132nd Street
Seattle, Washington 98133

Letter 237

From: Barbara Gross
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 11:01:37 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.

237-1

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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* 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 Gross
barbara.gross48@gmail.com
6536 44th Ave NE
Seattle, Washington 98115-7542

Letter 238

From: Mary Ann Gwinn
To: PCD_CompPlan_EIS
Subject: questions about comprehensive plan
Date: Monday, May 6, 2024 11:21:23 AM

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.

Letter 239

DEIS StoryMap Comment

Name: Steph Hagerty

Email: stevenhhagerty@gmail.com

Date: 4/28/2024

Comment:

239-1

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
Reforesting 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.

Letter 240

From: Cheyenne Haines
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 4:15:48 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.

240-1

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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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

Letter 241

From: Mark Hammarlund
To: PCD_CompPlan_EIS
Subject: Comment on Comprehensive Plan EIS
Date: Thursday, April 11, 2024 8:34:43 PM

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.

241-1

Mark Hammarlund
2121 N. 143rd St.
Seattle WA 98133

Letter 242

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

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 oder 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. 242-1

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

Letter 243

From: Judith Hance
To: PCD_CompPlan_EIS
Subject: Comments on plan
Date: Friday, May 3, 2024 9:48:31 AM

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. 243-1

I have been appalled at the many houses being built in Seattle withou 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

Letter 244

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

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.

244-1

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

Letter 245

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

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.

245-1

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."

245-1 cont

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

245-1
cont

Letter 246

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

Letter 247

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

Letter 248

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.

248-1

Letter 249

From: Anna Hill
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Wednesday, May 8, 2024 11:52:43 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).

249-1

* 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:

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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.

Anna Hill
anna.hill.206@gmail.com
2711 N.E. 105th St.
Seattle, Washington 98125

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**

Letter 251

From: William Holland
To: PCD_CompPlan_EIS
Subject: More agressive comp plan please
Date: Monday, May 20, 2024 5:00:18 PM

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

Letter 252

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. 252-1

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
1901 NE 135th St
Seattle, Washington 98125

Letter 253

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

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

Letter 254

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. 254-1

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

254-1
cont

Letter 255

From: Matt Hutchins
To: PCD_CompPlan_EIS
Subject: DEIS comments
Date: Sunday, May 5, 2024 7:55:53 AM

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:

255-1

- **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.

255-1 cont

- **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 Residental 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

255-1 cont

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.

255-1 cont

- **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 adaption.

255-1 cont

- **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
Direct: 206.360.8336
Office: 206.256.9886
website instagram facebook

Letter 256

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

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? 256-1

Thank you for your consideration,

Kippy Irwin

Sent from my iPad

Letter 257

From: Steve Itano
To: PCD_CompPlan_EIS
Subject: Save our trees
Date: Friday, May 3, 2024 11:31:38 PM

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



257-1

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

Letter 258

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**

258-1

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

258-1 cont

Letter 259

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

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 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 tha 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. 259-1

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 th 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 th eNIMBY-ism and th 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 he 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 dNorth 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 grown 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

Letter 260

From: Tim Jaureguy
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 12:17:43 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).

260-1

* 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.

Tim Jaureguy
tim.jaureguy@gmail.com
5110 NE 54th St
Seattle, Washington 98105

Letter 261

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

Letter 262

From: barbara Jeniker
To: PCD_CompPlan_EIS; Strauss, Dan
Subject: Environmental Impact Statement
Date: Friday, May 3, 2024 11:54:51 AM

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 removd 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.

262-1

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? Rememver, saplings do not equal mature trees.

Letter 263

From: Jerome MD PhD, Keith R
To: PCD_CompPlan_EIS
Subject: Comp plan comment
Date: Monday, May 20, 2024 1:50:33 PM

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.

263-1

Keith Jerome
Seattle

Letter 264

From: C Johnson
To: PCD_CompPlan_EIS
Cc: LEG_CouncilMembers
Subject: Comment on DEIS
Date: Monday, May 6, 2024 4:58:32 PM

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? 264-1

- 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?

- 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

Letter 265

From: Iskra Johnson
To: PCD_CompPlan_EIS
Subject: comment on One Seattle Plan DEIS
Date: Monday, May 6, 2024 3:52:05 PM

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?

265-1

Iskra Johnson

Letter 266

From: Iskra Johnson
To: PCD_CompPlan_EIS
Subject: Comment on Comprehensive Plan DEIS
Date: Monday, May 6, 2024 4:00:52 PM

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? 266-1

Iskra Johnson

From: Iskra Johnson
To: PCD_CompPlan_EIS
Subject: Comment on Comprehensive Plan EIS
Date: Monday, May 6, 2024 4:00:45 PM

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? 266-2

Iskra Johnson

From: Iskra Johnson
To: PCD_CompPlan_EIS
Subject: Comment on Comprehensive Plan DEIS
Date: Monday, May 6, 2024 4:00:47 PM

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

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

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?

266-3

Iskra Johnson

From: Iskra Johnson
To: PCD_CompPlan_EIS
Subject: Comment on Comprehensive Plan DEIS
Date: Monday, May 6, 2024 4:00:34 PM

CAUTION: External Email

266-4

8.How will the One Seattle Plan mitigate damages from deforestation and the lack of organic drainage formerly provided by larger trees?

Iskra Johnson

From: Iskra Johnson
To: PCD_CompPlan_EIS
Subject: Comment on Comprehensive Plan DEIS
Date: Monday, May 6, 2024 4:00:33 PM

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

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?

266-4 cont

Iskra Johnson

From: Iskra Johnson
To: PCD_CompPlan_EIS
Subject: Comment on Comprehensive Plan DEIS
Date: Monday, May 6, 2024 3:58:00 PM

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?

266-5

Iskra Johnson

From: Iskra Johnson
To: PCD_CompPlan_EIS
Subject: Comment on Comprehensive Plan DEIS
Date: Monday, May 6, 2024 4:02:36 PM

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/)

266-5 cont

Iskra Johnson

From: Iskra Johnson
To: PCD_CompPlan_EIS
Subject: Comment on Comprehensive Plan DEIS
Date: Monday, May 6, 2024 4:00:28 PM

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

Letter 267

From: Andalucia Johnston
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Urgent Comment on DEIS
Date: Sunday, May 5, 2024 8:00:32 PM

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?

267-1

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,

Luci Johnston

Letter 268

From: Judi Jones
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 10:44:53 AM

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). 268-1

* 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.

Judi Jones
jjinseattle@me.com
4616 25th Ave NE #484
Seattle, Washington 98105

Letter 269

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.
* 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.

269-1

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.

Mary Jones
206mej@gmail.com
2600 Fairview Ave East, Slip #5
Seattle, Washington 98102

Letter 270

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.**

270-1

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
(206) 819-9924 cell

Letter 271

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.

-- -- -- -- --

>> 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?

271-1

>> 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_IIILAUSRE_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?

271-1 cont

>> 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?

271-2

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Letter 272

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.

272-1

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.

Letter 273

From: Dan Keefe
To: PCD_CompPlan_EIS
Subject: Comp Plan Shortcomings
Date: Sunday, May 5, 2024 10:16:15 PM

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.

273-1

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

Letter 274

From: Sophia Keller
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 8:29:15 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.

274-1

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.

Sophia Keller
keltiawind@gmail.com
851 SW 127th Street
Seattle, Washington 98146

Letter 275

From: Kathryn Keller
To: PCD_CompPlan_EIS
Subject: A few comments on the One Seattle DEIS and Plainng 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. 275-1

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 thresh hold 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 unwire '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 re zoned.

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. 275-2

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 uncovered 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. 275-3

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.

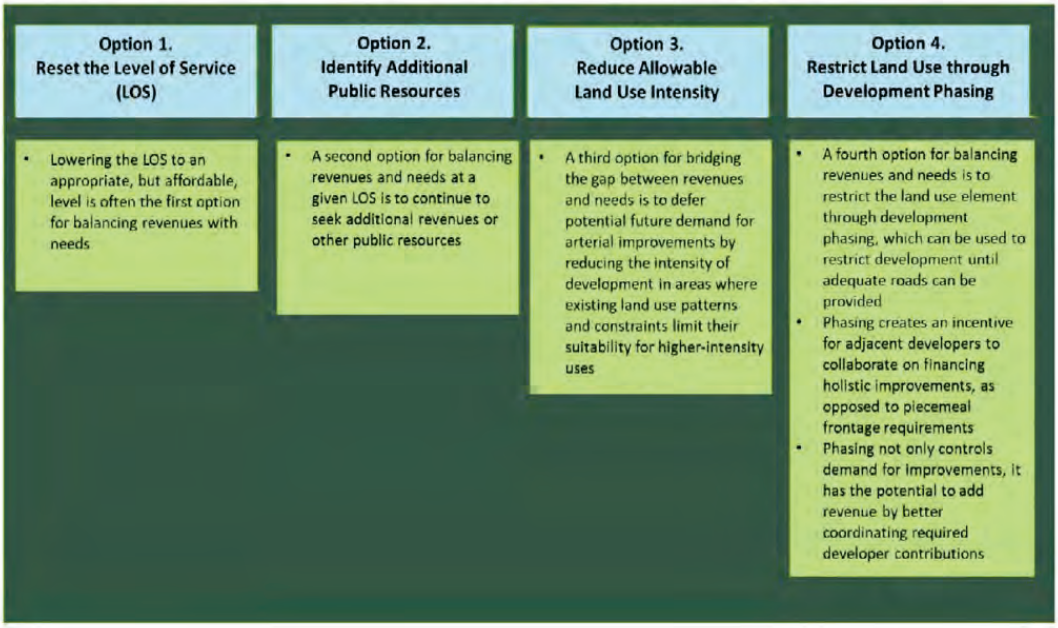
Finally: Saving trees elsewhere or any other grand scheme is not a reason for Seattle to take action that contradicts the basic concurrency factors we have decided matter for a healthy life. GMA envisions a system of complete towns and cities. It is framed with growth boundaries, ending suburban subdivisions 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. 275-4

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 cont

Figure TE-8 Reassessment Strategy Options for Balancing LOS, Land Use, and Revenues



Letter 276

From: Peter Kelly
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 8:48:14 AM

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.

276-1

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

Letter 277

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

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." 277-1

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.

277-1
cont

Shana Kelly, M.S., CCC-SLP

Pediatric Speech Language Pathologist
Children's Communication Corner, Inc.
www.communicationcorner.org

Letter 278

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. 278-1

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.” **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 64th St
Seattle, WA 98107

Letter 279

From: Paulette Kidder
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 5:48:46 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).

279-1

* 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.

Paulette Kidder
pwkidder@seattleu.edu
2122 N 88th Street
Seattle , Washington 98103

Letter 280

From: Janet Kimball
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 3:22:40 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.

280-1

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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* 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.

Janet Kimball
hughandjanetkimball@yahoo.com
8051 28th Avenue NE
Seattle, Washington 98115

Letter 281

From: Vicki King
To: PCD_CompPlan_EIS
Subject: Comp Plan comments
Date: Sunday, May 5, 2024 6:24:43 PM

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. 281-1

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

Letter 282

From: Susan Kirchoff
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Wednesday, May 8, 2024 1:01:20 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.

282-1

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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* 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

Letter 283

From: Tracey Kirk
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 6:30:16 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).

283-1

* 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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* 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
6801 43rd Ave Ne
Seattle, Washington 98115

Letter 284

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…". 284-1

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.

284-1 cont

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

284-1 cont

Letter 285

From: Timothy Kitchen
To: PCD_CompPlan_EIS
Subject: Support Original Abundance Map, Seattle Comprehensive Plan
Date: Monday, May 20, 2024 4:20:37 PM

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.

285-1

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 shere and her family deserve to live here?

Best,
Timothy Kitchen :)

Letter 286

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

Letter 287

From: suzanne knoblet
To: PCD_CompPlan_EIS
Subject: Light rail etc
Date: Tuesday, March 12, 2024 11:39:10 AM

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

Letter 288

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?

288-1

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.

288-2

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.

288-2
cont

Cheryl Kordick
823 NE 98th Street
Maple Leaf resident

Letter 289

From: Eugene Kramer
To: PCD_CompPlan_EIS
Subject: Comprehensive Plan Housing Abundance Map.
Date: Monday, May 20, 2024 3:27:44 PM

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.

289-1

Respectfully,
Eugene Kramer

Foundation Board Member,
Grants, Fundraising, Seattle Subway
grants@seattlesubway.org
www.SeattleSubway.org

Letter 290

From: Thomas Kuczmarski
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 7:15:29 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.

290-1

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.

Thomas Kuczmarski
thomaskuczmarski@gmail.com
815 Northeast 97th Street
Seattle, Washington 98115

Letter 291

From: Carrie Lafferty
To: PCD_CompPlan_EIS
Cc: Moore, Cathy
Subject: Environmental Impact Statement comments
Date: Thursday, May 2, 2024 7:30:37 PM

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?

291-1

Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What 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%2F
https://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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Letter 292

From: J. Lange
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Monday, May 6, 2024 1:40:21 AM

CAUTION: External Email

Please note my comment on the DEIS:

292-1

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.” 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

Sent from my iPhone

Letter 293

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?

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?

293-1

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

Letter 294

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.

294-6

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

Letter 295

From: Sarah Lappas
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Monday, May 6, 2024 3:32:22 PM

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? 295-1

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,

Sarah Lappas

Letter 296

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 Neighborood 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

Letter 297

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

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.

297-1

Terry Law

206-498-2413 cell

Letter 298

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.** 298-1

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. 299-1

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

299-1 cont

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. 300-1

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.

300-1 cont

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

Letter 301

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

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
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

Letter 302

From: Judith Leconte
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 7:53:33 AM

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).

302-1

* 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.

Judith Leconte
tbacgster@gmail.com
6506 19th A e. N E
Seattle, Washington 98115

Letter 303

From: Richard Lee
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 8:05:07 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). 303-1

* 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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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.

Richard Lee
ricklee1@comcast.net
5210 37th Ave NE
Seattle, Washington 98105

Letter 304

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

304-1

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 135th not far from the new car garage, the 100's of apartments going up on the Shoreline side of 145th, 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.

304-1 cont

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.

204-1 cont

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 an 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.

304-1 cont

- 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…**

304-1
cont

Thank you for reading,
Michele Leonard
13502 Ashworth Avenue North
Seattle WA 98133

Letter 305

From: Judith Leshner
To: PCD_CompPlan_EIS
Cc: Kettle, Robert
Subject: Questions related to Trees
Date: Sunday, May 5, 2024 12:22:13 PM

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? 305-1

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

Letter 306

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

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.

306-1

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.

Letter 307

From: Sarah Lewis
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Monday, May 6, 2024 5:17:19 PM

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?

307-1

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,

S. Lewis

Letter 308

From: Christine Lewis
To: PCD_CompPlan_EIS
Subject: Proposed zoning changes for Winona neighborhood
Date: Monday, May 20, 2024 1:52:15 PM

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!

Letter 309

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

320 W Galer Street | Suite 100
Seattle, Washington 98119

Website | LinkedIn | View Listings
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Letter 310

From: Pat Limberg
To: PCD_CompPlan_EIS
Subject: Save our trees
Date: Monday, May 6, 2024 7:19:52 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.

310-1

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.

Pat Limberg
patlimberg@gmail.com
816 NE 95th St
Seattle , Washington 98115

Letter 311

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

Letter 312

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

Letter 314

From: Bill
To: PCD_CompPlan_EIS
Cc: Moore, Cathy
Subject: Comments One Seattle Plan EIS
Date: Monday, May 6, 2024 4:56:30 PM

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? 314-1

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

Letter 315

From: Ryan Lorey
To: PCD_CompPlan_EIS
Subject: Fw: One Seattle Comprehensive Plan Feedback
Date: Sunday, April 14, 2024 10:04:43 PM

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.

315-1

Thanks,
Ryan Lorey

From: Ryan Lorey <ryanlorey@outlook.com>
Sent: Thursday, April 11, 2024 12:18 PM
To: Cathy.Moore@seattle.gov <Cathy.Moore@seattle.gov>; Tanya.Woo@seattle.gov <Tanya.Woo@seattle.gov>; Sara.Nelson@seattle.gov <Sara.Nelson@seattle.gov>; bruce.harrell@seattle.gov <bruce.harrell@seattle.gov>; opcd@seattle.gov <opcd@seattle.gov>
Cc: council@seattle.gov <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.

315-1 cont

Thank you for your hard work on this proposal, and I hope that the community's feedback will be heard.

Thank you,
Ryan Lorey

Letter 316

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

Letter 317

From: Nelson Lowhim
To: PCD_CompPlan_EIS
Subject: Increase the housing in Seattle please
Date: Wednesday, April 17, 2024 4:47:53 PM

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

317-1

Letter 318

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

318-1

On Wed, Apr 17, 2024 at 16:46 Nelson Lowhim <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

Letter 319

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.** 319-1
- **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**

Thank you for considering the **essential quality of life** which has made Seattle the special place it is.

- Neil Ludman
  6326 20th Ave NE, Seattle WA 98115

Letter 320

From: Finu Lukose
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Monday, May 6, 2024 1:59:50 PM

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?

320-1

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,

Finu Lukose

Letter 321

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? 321-1

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

Letter 322

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.

322-1

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.

David Luxem
daluxem1@yahoo.com
1903 SW Hillcrest Rd
Seattle, Washington 98166

Letter 323

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

Letter 324

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

Letter 325

From: 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

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

Letter 326

From: Bernice Maslan
To: PCD_CompPlan_EIS
Subject: important comments on Draft EIS
Date: Monday, May 6, 2024 11:14:17 AM

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. 326-1

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. 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

Letter 327

From: Cristin Mattione
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Saturday, May 4, 2024 9:49:24 PM

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

Letter 328

From: Gabriel Mauel
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:27:58 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.

328-1

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.

Gabriel Mauel
gabemauel@gmail.com
418 Bellevue Ave E 508
Seattle, Washington 98102

Letter 329

From: 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

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 130th Street and 145th 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 40th Ave NE
Seattle, WA 98125

Letter 330

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.

330-1

Letter 331

From: Kym McDonald
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 4:45:38 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.

331-1

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.

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

Letter 332

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

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. 332-1

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

159 S. Jackson Street, Suite 300
Seattle, WA 98104
www.nitze-stagen.com

NITZE-STAGEN

332-1
cont

NITZE-STAGEN

159 South Jackson Street, Suite 300
Seattle, Washington 98104

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.

332-1 cont

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.

Letter 333

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

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

Letter 334

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.

334-1

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.

Tina Michalski
tlmichalski@gmail.com
18412 Thorsen Rd SW
Vashon, Washington 98070

Letter 335

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

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.

335-1

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

Letter 336

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

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

Letter 337

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.

337-1

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.

Letter 338

From: Amy Miller Dowell
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 11:17:28 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). 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

Letter 339

From: Mireia
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Monday, May 6, 2024 1:08:26 PM

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

Letter 340

From: 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

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.

340-1

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

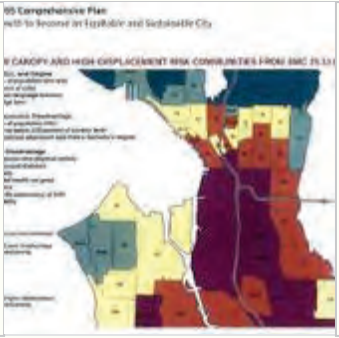
Update
https://www.seattle.gov/documents/Departments/OPCD/OngoingInitiatives/EnvisioningInterbay/InterbayLandUseStudyPreliminaryRecommendations.pdf

Sent using the mobile mail

Letter 341

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



341-1

blank

blank

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!

341-1
cont

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?**

341-1 cont

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

341-1 cont

Letter 342

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 74th Street
Seattle
bmorgan5@comcast.net

Comments:

3.1 Earth

1.K "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.K 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.

342-2 cont

Question: Do these statements intend to say that the currently applicable regulations mitigate impacts to the greatest extent possible?

3.K 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-strory, 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.K 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:

342-3

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.

342-3 cont

Therefore, the conclusion that there is no significant environmental impact related to land use patterns and urban form is incorrect.

3.10 Transportation

5.K 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 <u>examples:</u>

- -K 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.
- -K 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.

342-4

Letter 343

DEIS StoryMap Comment

Name: Robert (Bob) Morgan

Email: bmorgan5@comcast.net

Date: 5/6/2024

Comment:

Comment #1

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.

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."

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.

343-1

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-strory, rather than 3 story development. This will result increased loss of tree canopy.

343-1 cont

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.

Letter 344

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:

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. 344-1

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.

344-1 cont

Letter 345

From: Aileen Morrow
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Sunday, May 5, 2024 8:48:47 PM

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?**

345-1

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

Letter 346

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

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

346-1

Letter 347

From: Guila Muir
To: PCD_CompPlan_EIS
Subject: Comment on the EIS re: TREE CANOPY
Date: Sunday, May 5, 2024 10:10:29 AM

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 gtreen area nearly daily and see how small young saplings struggle to survive.

347-1

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

Letter 348

From: Alan Muller
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 10:38:03 AM

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).

348-1

* 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.

Alan Muller
venerablelekshay@gmail.com
609 Yesler Way, Apt 2-206
Seattle, Washington 98104-3722

Letter 349

From: Callie Neylan
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 8:27:31 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).

349-1

* 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.

Callie Neylan
neylano@me.com
1934 4th Ave West
Seattle, Washington 98119

Letter 350

From: Susan Nicol
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 8:37:23 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. 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). 350-1

* 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.
Susan M Nicol
Wallingford neighborhood

Susan Nicol
susanmnicol@gmail.com
4310 Sunnyside Ave North
Seattle, Washington 98103

Letter 351

From: Margaret Nims
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 1:38:26 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).

351-1

* 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.

Margaret Nims
margot888@comcast.net
PO Box 15455
Seattle, Washington 98115-0455

Letter 352

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,

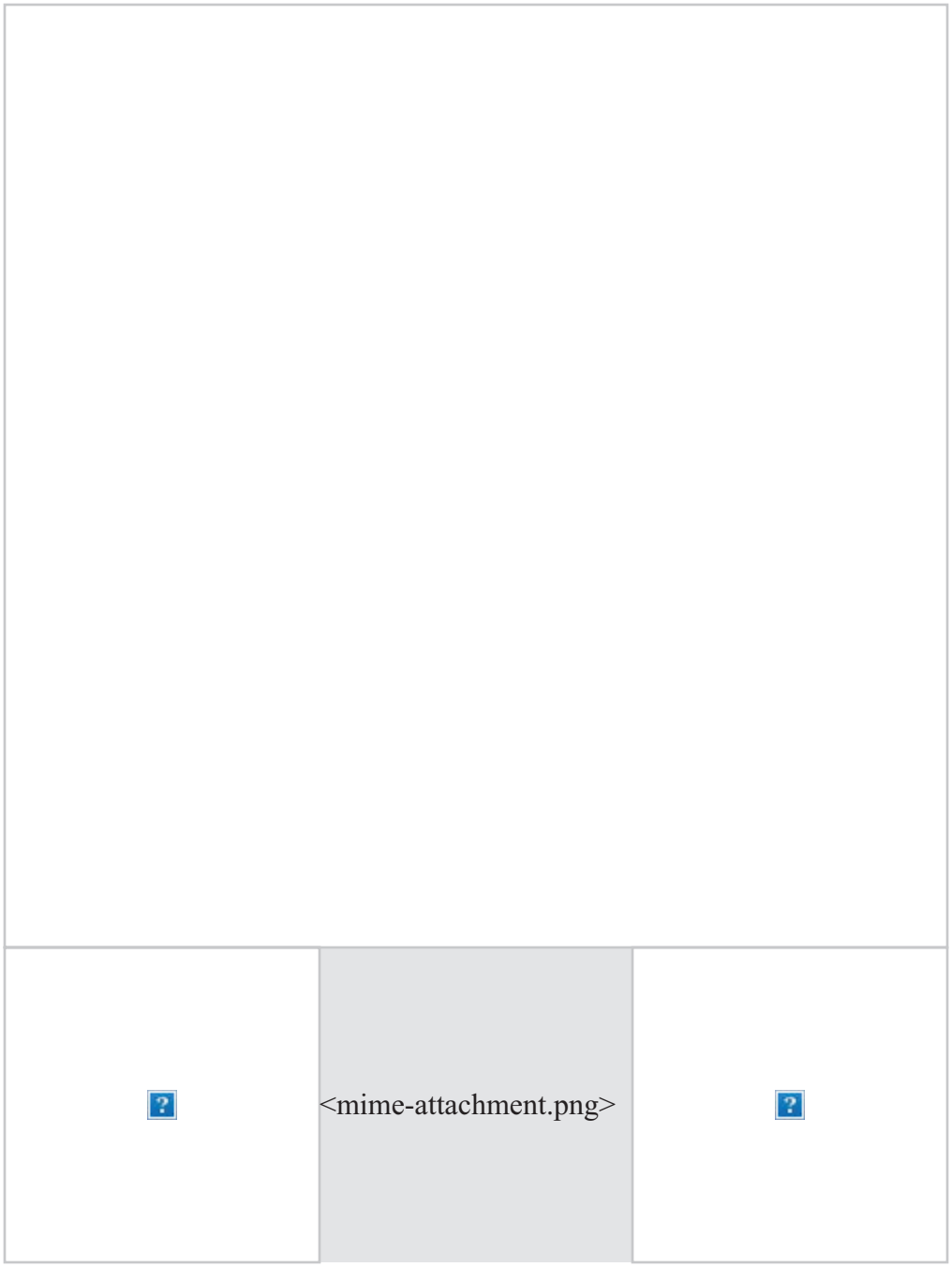
As always your wisdom and attention to detail abound.

Unfortunately, the corruption that has permeated City Hall knows no limits and the likes of Mayor Lowe, puppet Strauss and other key MBAKS 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.

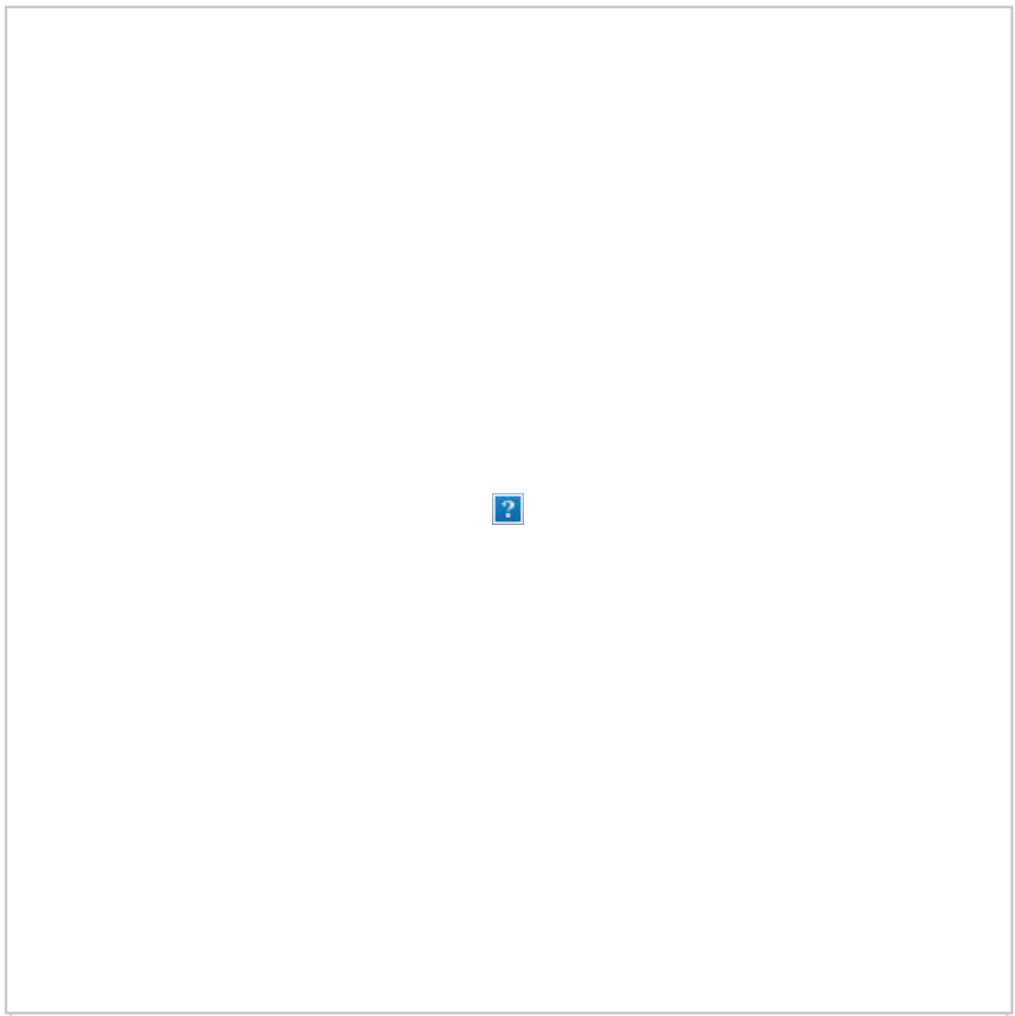
Sent from my iPhone

> On May 2, 2024, at 6:45 PM, 'David Moehring' via SeattleTreeLoss <seattletreeloss@googlegroups.com> wrote:



<mime-attachment.png>

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.

352-1 cont

'Seattle One (idea only)' DEIS questions as to environmental impact:

In what way, if any, does the environmental impact statement sustain urban nature?

blank

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*.”

blank

- **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?**

352-1 cont

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

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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?

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.
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.

Letter 353

From: Kris Niznik
To: PCD_CompPlan_EIS
Subject: Comprehensive Plan Scenario Choice
Date: Monday, May 6, 2024 5:13:39 PM

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. 353-1

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

Letter 354

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. 354-1

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.

Letter 355

From: Pennie O
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 7:25:49 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. 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).

355-1

* 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.

Pennie O
pennielink@mac.com
8038 Meridian Ave N
Seattle, Washington 98103

Letter 356

From: Barbara OSteen
To: PCD_CompPlan_EIS
Subject: tree canopy
Date: Tuesday, May 7, 2024 1:33:39 PM

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?

356-1

- 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)?

Sent from a concerned citizen
Barbara O'Steen

Letter 357

From: Hali Obray
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Monday, May 6, 2024 7:46:31 AM

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? 357-1

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 Obray

Letter 358

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

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.

358-1

Sincerely,
Margaret Okamoto
margaretokamoto@yahoo.com
2563 6th Ave W
Seattle WA 98119

Letter 359

From: Joe Olson
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Saturday, May 4, 2024 9:48:11 PM

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? 359-1

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

Letter 360

From: Carol Olwell
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 10:28:49 AM

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.

360-1

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

Letter 361

From: Marisol Ortega
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 5:03:44 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).

361-1

* 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.

Marisol Ortega
marisol.ortega@hotmail.com
3596 Tacoma Ave S
Tacoma, Washington 98418

Letter 362

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**.** 362-1

- 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)?**

Best regards,

David J. Ortiz, PhD
District 4 resident

Letter 363

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

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? 363-1

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

Letter 364

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

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

Letter 365

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

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

365-1

Letter 366

From: Carmen Pan
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:49:31 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).

366-1

* 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.

Carmen Pan
hopes-subsets-0v@icloud.com
418 Bellevue Ave E, Apt 103
Seattle, Washington 98102

Letter 367

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.

367-1

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

Letter 368

From: Alex Pearson
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:02:47 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).

368-1

* 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.

Alex Pearson
alexandrabronwyn@gmail.com
5515 28th Ave Ne
Seattle, Washington 98105

Letter 369

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

Letter 370

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

Letter 371

From: Sarah Pellkofer
To: PCD_CompPlan_EIS
Cc: Rivera, Maritza
Subject: Comp Plan EIS questions
Date: Tuesday, May 7, 2024 7:54:27 PM

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 plans and animals will be?

371-1

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

Letter 372

From: Nancy Penrose
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:05:23 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).

372-1

* 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.

Nancy Penrose
mue.rose@gmail.com
2402 E Olive St
Seattle, Washington 98122

Letter 373

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. 373-1

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

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

Letter 374

From: Ellen Pifer
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Monday, May 6, 2024 8:01:17 AM

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:

374-1

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.” 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

Letter 375

DEIS StoryMap Comment

Name: Emily Pike

Email: elaurelpike@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.

375-1

Letter 376

DEIS StoryMap Comment

Name: Emily Pike

Email: 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.

376-1

Letter 377

DEIS StoryMap Comment

Name: Emily Pike

Email: elaurelpike@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.

377-1

Letter 378

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.

378-1

Letter 379

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.

379-1

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 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
Hpope@live.com

Letter 380

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
Hpope@live.com

Letter 381

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.

381-1

These are weaknesses of the One Seattle Comprehensive Plan draft Environmental Impact Statement (draft EIS).

* 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

Letter 382

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

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

Yes. Thank you for your comment.

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
Direct/cell: 425-891-7842

382-1

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,

382-1 cont

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
Direct/cell: 425-891-7842

Letter 382

May 5, 2024

Tharsis Law P.S.
Jacquie Quarré
425-891-7842
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
PCD_CompPlan_EIS@seattle.gov

Copy to: Michael Hubner
Long Range Planning Manager,
One Seattle Plan Project Manager
michael.hubner@seattle.gov

Jim Holmes
EIS Lead
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.[1]

382-1 cont

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

[1] *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."[2]

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."[3]

382-1 cont

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."

[2] *See* https://ecology.wa.gov/water-shorelines/wetlands/tools-resources/wetland-program-plan.
[3] *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 **<u>to enhance public access while also restoring ecological conditions of the shoreline</u>**, 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.

Letter 383

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.

383-1

Thank you,
Aleksandra Radmanovic
206.261.0269

Letter 384

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

Letter 385

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

Letter 386

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??

386-1

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

Letter 387

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).

387-1

* 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.
Mireia

Mireia Ravell Padial
mravell@gmail.com
6303 224th St SW
Mountlake Terrace, Washington 98043

Letter 388

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).

388-1

* 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.
Mireia R.P.

Mireia Ravell
mravell@gmail.com
6303 224th St SW
Mountlake Terrace , Washington 98043

Letter 389

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

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.

389-1

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

Letter 390

From: Mickey Riley
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:22:07 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).

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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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.

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

Letter 391

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.

391-1

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?

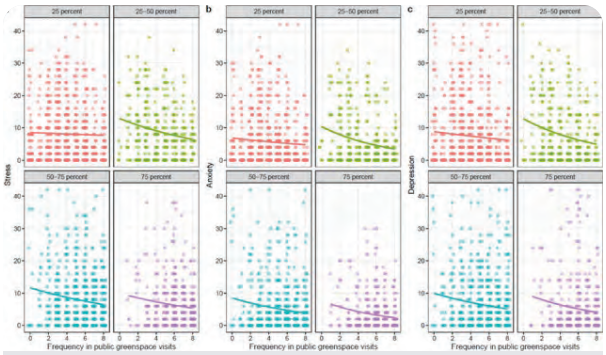
2: Section P 3-3 states that "none of the alternatives would be expected to have significant, unavoidable adverse impacts on tree canopy cover." What analysis shows that tree planting programs, coupled with increased hardscape, will compensate for lost urban forest?

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

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

391-1 cont

Letter 392

May 5, 2024

Tharsis Law P.S.
Jacquie Quarré
425-891-7842
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
PCD_CompPlan_EIS@seattle.gov

Copy to: Michael Hubner
Long Range Planning Manager,
One Seattle Plan Project Manager
michael.hubner@seattle.gov

Jim Holmes
EIS Lead
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.[1]

392-1

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

[1] *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.

392-1 cont

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."[2]

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."[3]

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:

- K P 1.6: "Provide public access to shorelines by using street ends, regulations, or acquisition."

- K 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."

[2] *See* https://ecology.wa.gov/water-shorelines/wetlands/tools-resources/wetland-program-plan.
[3] *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):

392-1 cont

> "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."

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.

Letter 393

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.

393-1

Letter 394

From: Jason Rock
To: PCD_CompPlan_EIS
Subject: Bring back the Abundance Map
Date: Monday, May 6, 2024 8:51:39 AM

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.

394-1

Letter 395

From: Anne Roda
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:32:11 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.

395-1

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.

Anne Roda
imanneroda@gmail.com
1941 Gilman Dr W Lowr
Seattle, Washington 98119

Letter 396

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?

396-1

- 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

Letter 397

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.
* 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.

Keith Roraback
kroraback@me.com
4327 NE 45th St
Seattle, Washington 98105-5139

Letter 398

From: Cynthia ROSE
To: PCD_CompPlan_EIS
Subject: One Seattle Plan response
Date: Monday, May 6, 2024 12:18:07 AM

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. 398-1

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

Letter 399

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.

399-1

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
LinkedIn | Instagram

Letter 400

From: Carolyn Rubenkonig
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS - comprehensive plan
Date: Monday, May 6, 2024 10:34:44 AM

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?

400-1

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 Rubenkonig

Letter 401

From: Catherine Ruha
To: PCD_CompPlan_EIS
Subject: One Seattle Comments
Date: Saturday, May 4, 2024 11:19:21 AM

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: 401-1

- 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?

401-1 cont

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 91st Street
Seattle, WA 98115

Letter 402

From: Moani Russell
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 11:07:31 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.

402-1

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.

Moani Russell
moanirussell@gmail.com
7526 39TH AVE NE
Seattle, Washington 98115

Letter 403

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

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Letter 404

May 6, 2024

VIA Email
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.

404-2

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:

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.

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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.[1]

404-2 cont

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."[2] The DEIS shares a similar sentiment with supplemental information. [3]

- 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.[4]

---

[1] 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).

[2] One Seattle Plan Anti-Displacement Framework, p. 4.

[3] DEIS, Ch 3.8-22-30.

[4] 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.

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- 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.

404-2 cont

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...

Letter 405

From: Barbara Sanborn
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 2:05:19 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

405-1

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

Letter 406

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.

406-1

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.

406-2

Letter 407

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.

407-1

-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

Letter 408

From: Hope Sanford
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:48:43 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

These are my comments regarding the One Seattle Plan draft Environmental Imact 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 disingenous- 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

408-1

Hope Sanford
Hopesnopes@gmail.com
3230 NE 91st St
Seattle, Washington 98115

Letter 409

From: Lindsey Sargent
To: PCD_CompPlan_EIS
Subject: Comments on the comp plan
Date: Thursday, April 11, 2024 8:06:08 PM

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. 409-1

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

Letter 410

DEIS StoryMap Comment

Name: Eleanor Saxton

Email: 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

Letter 411

From: Susan Scanlon
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 8:32:03 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.

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"
* 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 Scanlon
scanlons4@comcast.net
8021 11th Ave NW
Seattle, Washington 98117

Letter 412

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

Letter 413

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")

413-1

Letter 414

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

Letter 415

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

Letter 416

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.
* 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 Scarlett
trentjen@yahoo.com
1045 S SULLIVAN ST
SEATTLE, Washington 98108

Letter 417

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? 417-1

Thank you,

Stella Schiefer
Age 15
Wedgwood, Seattle

Letter 418

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

Letter 419

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

CAUTION: External Email

Thank you for the opportunity to comment on the Plan and the draft EIS statement.

419-1

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

Letter 420

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.

420-1

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

Letter 421

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

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. 421-1

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

Letter 422

From: Norah Scully
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 10:29:20 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. 422-1

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.

Norah Scully
scullynorah@gmail.com
1414 NW 62nd St.
Seattle, Washington 98107

Letter 423

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

CAUTION: External Email

Please clarify how you will stop the continued loss of tree canopy in Seattle due to in-fill developement in residential neighborhoods that allow developers to clear mature trees from single family lots in order to maximize their profit from redevelopement? 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? 423-1

Juliet Shen

Letter 424

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? 424-1

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*

Letter 425

From: Julia Shettler
To: PCD_CompPlan_EIS; Strauss, Dan
Subject: Comments on DraftComprehensive Plan Environmental Impact Statement
Date: Thursday, May 2, 2024 9:27:09 PM

CAUTION: External Email

Please see my comments below:

425-1

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.” **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?**

Letter 426

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*

Letter 427

Dear Public Policy Officials:

I support Alternative 2.

Below are comments on the DRAFT EIS, focused specifically on the plants and animals section.

427-1

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?

- 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?

427-1 cont

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.

Letter 428

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 measur. 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?
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?
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 Urvan 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?

428-1 cont

Letter 429

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?

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!)

429-1

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

Letter 430

From: Kimberly Sims
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 3:28:22 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

430-1

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.

Kimberly Sims
simsk9512@gmail.com
9512 30th Ave NE
Seattle, Washington 98115

Letter 431

From: Kimberly Sims
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Saturday, May 18, 2024 4:33:40 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

431-1

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"
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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.

Kimberly Sims
simsk9512@gmail.com
9512 30th Ave NE
Seattle, Washington 98115

Letter 432

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

CAUTION: External Email

Greetings Councilmember Morales and others involved in the drafting of this statement.

432-1

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

Letter 433

DEIS StoryMap Comment

Name: Reid Smith

Email: reidasmith2@gmail.com

Date: 4/12/2024

Comment:

433-1

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.

Letter 434

From: Alice Speers
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 11:39:50 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. 434-1

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.

Alice Speers
alicespeers@gmail.com
6850 Woodlawn Ave NE
Seattle, Washington 98115

Letter 435

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-well-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

Letter 436

From: Ann Stevens
To: PCD_CompPlan_EIS
Subject: Comments
Date: Friday, May 3, 2024 3:45:40 PM

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? 436-1

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

Letter 437

From: Tonya Stiffler
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 3:32:03 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

437-1

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.

Tonya Stiffler
tstiffler@comcast.net
18051 Sunnyside Ave No
Shoreline, Washington 98133

Letter 438

From: Sean Stockwell
To: PCD_CompPlan_EIS
Subject: Not Enough - Seattle"s Comprehensive Plan
Date: Saturday, May 4, 2024 10:29:51 AM

CAUTION: External Email

Hello,

I am writing to encourage the city to plan for more types of housing throughout the city.

438-1

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

Letter 439

DEIS StoryMap Comment

Name: Linda Strock

Organization: HLUMC

Email: boblindastrock@yahoo.com

439-1

Date: 5/5/2024

Comment:

We would advocate for density. Much needed.

Letter 440

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.

Letter 441

From: Liann Sundquist
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 7:30:49 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

441-1

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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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

Letter 442

From: scott.surdyke@comcast.net
To: PCD_OneSeattleCompPlan; PCD_CompPlan_EIS
Cc: Strauss, Dan; 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,

442-1

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 and 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 treen canopy and substantially reduces opportunities for landscaping (which also is necessary for wildlife)

Neighborhood Centers:

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 Cente**r 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

442-1 cont

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

Letter 443

From: Rick Swing
To: PCD_CompPlan_EIS; council_@seattle.gov
Subject: Draft EIS
Date: Sunday, May 5, 2024 10:39:32 PM

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

Letter 444

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. 444-1

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

Letter 445

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

Letter 446

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. 446-1

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

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 theDraft 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.

446-1 cont

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.

446-1 cont

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.

446-1 cont

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.

446-1 cont

- 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.

446-1 cont

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.

446-1 cont

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.

446-1 cont

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)

446-1 cont

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

Letter 447

From: Sarah Taylor
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:31:25 AM

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. 447-1

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.

Sarah Taylor
sunbella6@icloud.com
8302 Linden N
Seattle, Washington 98103

Letter 448

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? 448-1 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. 448-2

Letter 449

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

Letter 450

From: Robin Thomas
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 12:49:26 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

450-1

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.

Robin Thomas
rubiclark@yahoo.com
1015 Mason St
Bellingham, Washington 98225

Letter 451

From: Toby
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Sunday, May 5, 2024 8:51:43 AM

CAUTION: External Email

Please note my comment on the DEIS:

451-1

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.” 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

Letter 452

DEIS StoryMap Comment

Name: Kristen Toms

Email: kristen_toms@hotmail.com

Date: 5/6/2024

Comment:

452-1

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

Letter 453

From: michael toohey
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 10:44:29 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

453-1

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.

michael toohey
toohey.michael@gmail.com
12004 17th Ave NE
Seattle, Washington 98125

Letter 454

DEIS StoryMap Comment

Name: Luke Travis

Email: luke.foobar@gmail.com

Date: 4/18/2024

Comment:

454-1

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.

Letter 455

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!

455-1

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.

455-1
cont

Thank you,
Matthew Trecha
888 Western Ave
Seattle, WA 98104

Letter 456

From: Megan Tully
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 8:49:13 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

456-1

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.

Megan Tully
megtully@hotmail.com
13722 Palatine Ave N
Seattle, Washington WA

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 (12th 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 (5th Ave NE, Roosevelt Way NE, 15th 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 90th 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 12th 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 80th 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 90th 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.

457-2 cont

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.

457-3

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.

457-3 cont

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 15th Ave NE to the U-District. Bus service was removed entirely from the 5th 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.

457-4

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.

457-4 cont

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 90th 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.

457-4 cont

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 12th Ave NE
Seattle, WA 98115
carolineu@mindspring.com
mikeu1@mindspring.com
Land line: 206-517-8096

Letter 458

From: Skyler Urban
To: PCD_CompPlan_EIS
Subject: Comment Re: Comp Plan - More Housing Needed
Date: Monday, May 20, 2024 11:51:28 AM

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. 458-1

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.

Letter 459

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

CAUTION: External Email

This email is to serve as public comment on Seattles Comprehensive Plan Environmental Impact Statement.

459-1

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 Seattles 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

Letter 460

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
emilyveebee55@gmail.com
4107 Wallingford Ave N
Seattle, Washington 98103

Letter 461

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

Letter 462

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. 462-1

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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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

Letter 463

From: Nils von Veh
To: PCD_OneSeattleCompPlan
Cc: Saka, Rob; 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.

463-1 cont

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

Letter 464

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

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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

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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

Letter 465

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

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:

465-1

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

Letter 466

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. 466-1
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

Letter 467

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

Letter 468

From: 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

468-1

From: wwaldmanmd@starpower.net
To: LEG_CouncilMembers; PCD_CompPlan_EIS
Subject: trees
Date: Sunday, May 5, 2024 12:40:52 PM

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

Letter 469

From: 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 theses 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

Letter 470

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.

470-1

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

Letter 471

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. 471-1

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

Letter 472

From: Sheila Warsinske
To: OneSeattleComplPlan@seattle.gov; PCD_CompPlan_EIS
Subject: Fwd: Affordable housing?
Date: Monday, May 6, 2024 1:36:56 PM

CAUTION: External Email

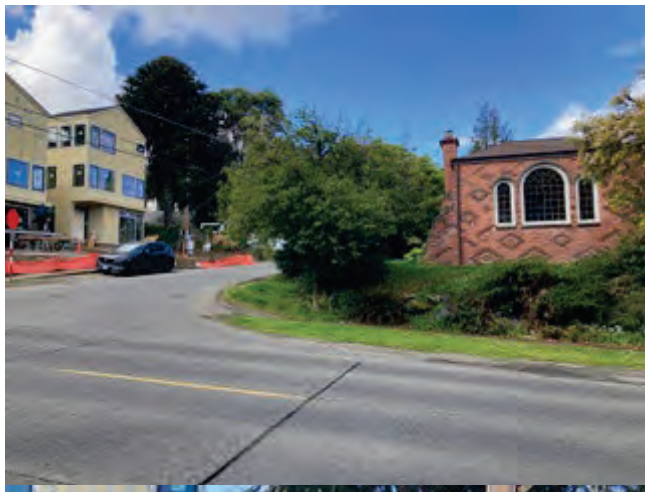
To: Whomever gets to read these emails. Apologies for duplicate emails. Responders suggested these emails instead.

472-1

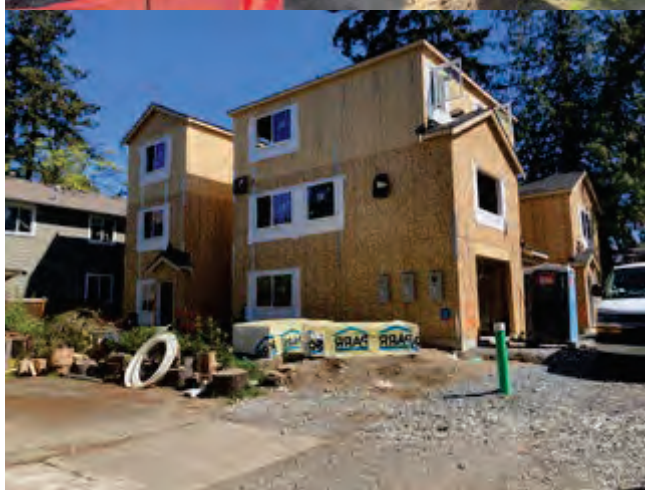
Begin forwarded message:

From: Sheila Warsinske <lostislandlodge@comcast.net>
Subject: Affordable housing?
Date: May 6, 2024 at 7:47:57 AM PDT
To: "OPCD@seattle.gov" <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

Letter 473

From: Sheila Warsinske
To: PCD_CompPlan_EIS; OneSeattleComplPlan@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.

473-1

Begin forwarded message:

From: Sheila Warsinske <lostislandlodge@comcast.net>
Subject: One Seattle Plan
Date: May 6, 2024 at 7:47:24 AM PDT
To: "OPCD@seattle.gov" <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?

473-1 cont

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?

473-1 cont

Sincerely,
Sheila Warsinske

Letter 474

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

Letter 475

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. 475-1

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.
* 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

Letter 476

From: lassie webster
To: PCD_CompPlan_EIS
Subject: One Seattle Plan
Date: Monday, May 6, 2024 12:33:03 PM

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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* 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.

Lassie Webster
2727 NE 91st Street
Seattle, WA 98115
lassiewebster@gmail.com

Letter 477

From: Lassie Webster
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 11:54:36 AM

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.
* 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
lassiewebster@gmail.com
2727 NE 91st Street
Seattle, Washington 98115

Letter 478

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

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. 478-1

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 unreached 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

Letter 479

From: 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

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 103rd Pl
Seattle, WA 98125

Letter 480

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.
* 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.

Jeff Weissman
jr.weissman@gmail.com
5222 Ivanhoe PL NE
Seattle, Washington 98105-2837

Letter 481

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.
* 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.
Maggie Weissman.

Maggie Weissman
maggie.weissman@gmail.com
5222 Ivanhoe Pl NE

Seattle, Washington 98105
Sent from my iPhone
Maggie Weissman
Managing Broker, CNE
Windermere Referral
206.226.0543
Www .maggieweissman.com

Letter 482

From: Maggie Weissman
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 1:29:52 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

482-1

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

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:

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Thank you for your consideration.
Maggie Weissman.

Maggie Weissman
maggie.weissman@gmail.com
5222 Ivanhoe Pl NE
Seattle, Washington 98105

Letter 483

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,

Yes, we need more affordable housing as the city grows, but we also need to have healthy and livable communities. 483-1

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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Thank you for your consideration.

Sincerely, Lisa Westgard

Lisa Westgard
kailine94@hotmail.com
240 S. 198th St
Des Moines, WA, Washington 98148

Letter 484

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.

484-1 cont

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

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To: PCD_CompPlan_EIS
Subject: Fwd: DEIS comments
Date: Tuesday, April 30, 2024 2:55:22 PM

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485-1 cont

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Woody Wheeler
Conservation Catalyst
P.O. Box 51151
Seattle, WA 98115
206-498-3553
www.conservationcatalyst.org

Letter 486

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

Letter 487

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

<u>Choose the No Action Alternative because the state mandated HB1110 is a required upzone.</u> 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.

487-1 cont

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.

.

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).

487-1 cont

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.

487-1 cont

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.

Letter 488

From: charles williams
To: PCD_CompPlan_EIS
Subject: EIS
Date: Sunday, May 5, 2024 10:26:45 AM

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
>

Letter 489

From: PAMELA WILLIAMS
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 7:03:09 AM

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

Letter 490

DEIS StoryMap Comment

Name: Tony Williams

Email: tmaxx98225@yahoo.com

Date: 5/3/2024

Comment:

490-1

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?
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?

Letter 491

From: Kevin Wilmot
To: PCD_CompPlan_EIS; LEG_CouncilMembers
Subject: Comment on DEIS
Date: Monday, May 6, 2024 9:08:40 AM

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?

491-1

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,
Kevin W.

Sent from my iPhone

Letter 492

From: Marian Wineman
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 12:24:13 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. 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

Letter 493

From: Melody Winkle
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 6:44:36 AM

CAUTION: External Email

Comments Planning and Community Development EIS,

493-1

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"
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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.

Melody Winkle
mwinkle@gmail.com
2518 NE 92nd St
Seattle, Washington 98115

Letter 494

From: Fritz Wollett
To: PCD_CompPlan_EIS
Subject: Growth
Date: Wednesday, May 8, 2024 7:11:13 AM

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.

494-1

Fritz Wollett
7340 24th Ave. NE
98115

Letter 495

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?

496-1

Letter 497

From: Cynthia Young
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 9:54:52 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).

497-1

* 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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* 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.

Cynthia Young
pearl206@aol.com
1523 NE 98th ST
Maple Leaf in North Seattle, Washington 98115

Letter 498

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

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

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

Letter 499

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

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 202122 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.

499-1 cont

Letter 500

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

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?

500-1

- 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.

500-1 cont

Steve Zemke for TreePAC and Friends of Seattle's Urban Forest

Letter 501

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. ...**

501-1

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.

501-1 cont

2nd 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

Letter 502

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.

502-1

- **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, 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

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 use 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.

502-1 cont

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

Letter 503

From: Tona Zubia
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 1:23:30 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.

503-1

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.

Tona Zubia
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Seattle, Washington 98122

Letter 504

From: Jûlina Zuluaga
To: PCD_CompPlan_EIS
Subject: Comments on Draft EIS
Date: Monday, May 6, 2024 3:26:33 PM

CAUTION: External Email

Comments Planning and Community Development EIS,

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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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504-1

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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.

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