

## **Comments and Responses**

# CHAPTER 4 COMMENTS AND RESPONSES

## 4.1 Public Comments

Chapter 4 of this Final Environmental Impact Statement (Final EIS) contains public comments provided on the Draft Environmental Impact Statement (Draft EIS) during the 45-day comment period, and this Chapter also provides responses to those comments. The comment period for the Draft EIS was extended from February 24 to April 11, 2011.

Section 4.1 provides a list of public comments while Section 4.2 provides responses to comments followed by the letters and public meeting minutes.

**Public  
Comments .....1  
Responses to  
Comments .....6**

**Chapter 4 Contents**

Table 4-1  
Public Comments Received During the Comment Period

Letter Number	Name (Last, First)	Agency/Organization	Date Received
<b>Public Agencies</b>			
1.	Timmerman, Carter	Washington State Department of Transportation	4/11/11
2.	Greve, Darren	King County Department of Natural Resources and Parks	4/11/11
3.	Freeman, Ketil and Belz, Sara	City of Seattle, Legislative Department	4/11/11
4.	Graves, David	Seattle Parks and Recreation	4/11/11
5.	Wilson, Barb	Seattle Planning Commission	4/11/11
<b>Community Organizations and Interest Groups</b>			
6.	Smith, Leslie G.	The Alliance for Pioneer Square	4/06/11
7.	Swenson, Skip	Cascade Land Conservancy	4/11/11
8.	O'Tool, Lori	The Center for Wooden Boats	3/28/11
9.	Danyluk, Edward	Denny Triangle Neighborhood Association	4/11/11
10.	Joncas, Kate	Downtown Seattle Association	4/11/11
11.	Woo, Eugenia	Historic Seattle	4/11/11
12.	Aramburu, J. Richard	Lake Union Opportunity Alliance	4/11/11
13.	Gemmel, Chris	Lake Union Opportunity Alliance	4/10/11
14.	Goodspeed, Jim; Gemmel, Chris; and Groth, Lori	Lake Union Opportunity Alliance	4/11/11

Letter Number	Name (Last, First)	Agency/Organization	Date Received
15.	Ramey, Brian	Lake Union Opportunity Alliance	4/10/11
16.	Staton, Renee A.	Leadership for Great Neighborhoods	3/28/11
17.	Lee, Sharon	Low Income Housing Institute	4/11/11
18.	Dinndorf, Jerry	South Lake Union Community Council	4/11/11
19.	Johnson, Rob	Transportation Choices Coalition	4/11/11
<b>Citizen Comment</b>			
20.	Adams, Terry and Ruth		4/11/11
21.	Allen, Chrissy	CB Richard Ellis	4/11/11
22.	Allen, Dean		4/11/11
23.	Alpert, Spencer		4/11/11
24.	Anderson, Fred	Leajack Construction	4/11/11
25.	Archambault, Curt	Jack in the Box Restaurants	4/06/11
26.	Archambault, Curt and Carla		4/06/11
27.	Armstrong, Sally		4/05/11
28.	Arrington, Alice		4/05/11
29.	Asher, Larry	School of Visual Concepts	3/24/11
30.	Auckland, David		4/07/11
31.	Autry, Mike		3/25/11
32.	Bacarella, Mary	Space Needle	3/28/11
33.	Bajuk, Christopher		3/29/11
34.	Banfill, Sally		3/25/11
35.	Behar, Howard		4/11/11
36.	Bekins, Pamela		3/29/11
37.	Bennett, Don		4/11/11
38.	Biggs, William	Group Health	4/08/11
39.	Bjerke, Bruce		3/25/11
40.	Bjerke, Jill		4/05/11
41.	Boland, Bridget		4/11/11
42.	Brandt, Adam		3/10/11
43.	Brooks, Tim	Kenmore Air	4/07/11
44.	Brumbaugh, Mark	Brumbaugh&Associates	4/10/11
45.	Buck, Peter L.	The Buck Law Group	4/11/11
46.	Buford, Thomas		3/12/11

<b>Letter Number</b>	<b>Name (Last, First)</b>	<b>Agency/Organization</b>	<b>Date Received</b>
47.	Burch, William and Gloria		4/01/11
48.	Butler, Henry and Olga		4/05/11
49.	Calder, Allegra		3/18/11
50.	Carlin, Gregory	Seattle Seaplanes	4/08/11
51.	Cesternino, Robert C.	Citadel Security Services	3/30/11
52.	Chadsey, Majorie		4/11/11
53.	Chandler, John		4/11/11
54.	Clancy, Karson		4/01/11
55.	Collins, Arlan and Woerman, Mark L.	Collins Woerman	3/30/11
56.	Coney, Donald John		4/08/11
57.	Corr, Saroj	CBRE Asset Services	4/10/11
58.	Coulter, Jefferson		3/27/11
59.	Cree, Russ	Glacier Real Estate Finance	3/25/11
60.	Crossley, Katharine		3/31/11
61.	Curran, Lori Mason		4/11/11
62.	Curtis, Jared		4/10/11
63.	Dasler, Joshua	CBRE	
64.	Douglas, Lloyd		4/11/11
65.	Doxsee, Marcella		4/11/11
66.	Ehlebracht, Mike	Hart Crowser, Inc.	4/05/11
67.	Estes, Brian		4/11/11
68.	Estes, Jill		4/11/11
69.	Evans, David R	David R Evans, SHME & Associates	4/07/11
70.	Felber, Jim		undated
71.	Foster, Dan	Finn Ferguson Corporate Real Estate	4/04/11
72.	Ferretti, Peter	Pan Pacific Hotel Seattle	4/11/11
73.	Fiedorczyk, Bryan		3/10/11
74.	Freeman, Judith		undated
75.	Frothingham, Donald		4/08/11
76.	Fulford, Lee		3/30/11
77.	Gaillard, Arnie and Pat		4/07/11
78.	Garner, Jackie	Garner Construction WBE Inc.	4/05/11
79.	Giacobazzi, Joseph, Paul Fuesel, Nelson Davis		undated
80.	Golde, Marcy J.		4/11/11

Letter Number	Name (Last, First)	Agency/Organization	Date Received
81.	Gooding, Kim		4/08/11
82.	Grant, Gabe	HAL Real Estate Investments Inc.	3/18/11
83.	Gregory, Serge		4/11/11
84.	Gunn, Cecelia		4/08/11
85.	Hafenbrack, Charles		3/31/11
86.	Hailey, Julia		4/10/11
87.	Hastings, Ryan		3/22/11
88.	Hazlehurst, Hamilton		3/28/11
89.	Healey, Ada M	Vulcan, Inc.	4/11/11
90.	Heffron, Marnie	Heffron Transportation, Inc.	4/11/11
91.	Hennings, Gloria		3/02/11
92.	Herb, Frederick and Margaret		4/08/11
93.	Hill, G. Richard	McCullough Hill Leary	4/11/11
94.	Holberg, Hillary		4/11/11
95.	Holmes, Robert J.		3/24/11
96.	Howe, Douglas, and Hurd, A-P	touchstone	4/06/11
97.	Hoy, Mary		4/11/11
98.	Huard, Brock		4/06/11
99.	Huberty, Dan	ZGF Architects	3/28/11
100.	Hughes, Brendan		4/11/11
101.	Hurd, A-P	touchstone	4/11/11
102.	Ito, Doug		3/31/11
103.	Johnson, Annalisa		4/11/11
104.	Johnson, Jay		3/17/11
105.	Kaivola, Linda		4/09/11
106.	Kaylor, Courtney A.	McCullough Hill Leary on behalf of Boris V Korry Testamentary Trust	4/07/11
107.	Kelly, James		4/06/11
108.	Kenny, Daniel		4/11/11
109.	Kenny, Dennis E.		4/11/11
110.	Kenny, Diane		4/11/11
111.	Kent, Mike		undated
112.	Kinzer, Craig and Richey, Kris	Kinzer Real Estate Services	4/07/11

Letter Number	Name (Last, First)	Agency/Organization	Date Received
113.	Kitto, Terri		4/11/11
114.	Kleinart, Jack		3/28/11
115.	Kleinart, Layne		undated
116.	Koshy, Ben		4/11/11
117.	Kroll, Jeff	Frontier Renewal	4/11/11
118.	Kushmerick, Martin		4/10/11
119.	Kushmerick, Patricia		4/10/11
120.	Langrand, Sylvain		4/10/11
121.	Larsen, Brian R.W.	South Lake Union Dentistry	4/08/11
122.	Lawless, Betsy		3/27/11
123.	Leabo, Dick A.	University of Michigan	3/08/11
124.	Leland, Larry	Perkins+Will	4/11/11
125.	Link, Kristen		4/03/11
126.	Littlel, John	Pacific Northwest Regional Council of Carpenters	undated
127.	Loacker, John		3/09/11
128.	Lust, Todd		4/08/11
129.	Malaspino, Joe		4/11/11
130.	Markley, David D.	Transportation Solutions, Inc.	4/11/11
131.	Masson, Chris		4/11/11
132.	Masson, Diane		4/09/11
133.	Matthews, Carrie		3/10/11
134.	Matthews, Tim		3/11/11
135.	McKay, JJ		3/23/11
136.	McLaughlin, Jan	Your Communication Connection	3/20/11
137.	Miller, Terry	Schultz   Miller	3/31/11
138.	Moss, Christine		undated
139.	Mulica, Thomas		4/08/11
140.	Munger, Jeffrey		4/11/11
141.	Muratore, Michael	Pan Pacific Hotel Seattle	4/11/11
142.	Naprawrich, MaryAnn		undated
143.	Norton, Ruthe and Frank		4/11/11
144.	Novy, Richard		4/11/11
145.	Nottingham, Sarah Rose		4/11/11
146.	O'Brien, Kathleen	O'Brien & Company	3/28/11
147.	Ostergaard, Paul B	Urban Design Associates	4/08/11

<b>Letter Number</b>	<b>Name (Last, First)</b>	<b>Agency/Organization</b>	<b>Date Received</b>
<b>148.</b>	Parente, Kini		4/11/11
<b>149.</b>	Parrish, Brad	Standard Parking	4/11/11
<b>150.</b>	Parsons, Craig		4/08/11
<b>151.</b>	Pavlovec, Brian and Giselle		4/07/11
<b>152.</b>	Pearson, William		4/06/11
<b>153.</b>	Pehrson, John		4/11/11
<b>154.</b>	Penn, Steve		4/10/11
<b>155.</b>	Petrie, Mark	Copiers Northwest	3/29/11
<b>156.</b>	Pope, Charles E.		4/09/11
<b>157.</b>	Potter, William W.		4/10/11
<b>158.</b>	Rabe, Jeff		3/16/11
<b>159.</b>	Randall, Jaime		4/07/11
<b>160.</b>	Redman, Scott	Sellen Construction Company	4/11/11
<b>161.</b>	Reel, Richard		3/29/11
<b>162.</b>	Reel, Richard		4/06/11
<b>163.</b>	Reel, Richard		4/11/11
<b>164.</b>	Rivera, Chris E.	Washington Biotechnology & Biomedical Association	4/08/11
<b>165.</b>	Roewe, Matthew H.	VIA Architecture	4/11/11
<b>166.</b>	Rusch, Scott	Fred Hutchinson Cancer Research Center	4/05/11
<b>167.</b>	Russell, Eric		3/28/11
<b>168.</b>	Sather, Katherine		3/25/11
<b>169.</b>	Saucier, Lyn	Chiles & Company	4/07/11
<b>170.</b>	Schauer, Tom		4/11/11
<b>171.</b>	Sevart, Ron	Space Needle Corporation	4/11/11
<b>172.</b>	Sharp, Jeff		4/10/11
<b>173.</b>	Shushan, Stephanie		4/11/11
<b>174.</b>	Simonetti, Martin	VLST Corporation	4/06/11
<b>175.</b>	Sleicher, Charles		4/09/11
<b>176.</b>	Smith, Patricia		4/06/11
<b>177.</b>	Smithhart, Noelle		4/11/11
<b>178.</b>	Snorks, Paul		4/08/11
<b>179.</b>	Starr, Scott		
<b>180.</b>	Stepherson, Josh		3/29/11
<b>181.</b>	Stoner, Mark	PeterStoner Architects	4/07/11
<b>182.</b>	Sullivan, David	Pan Pacific Hotel Seattle	4/11/11

Letter Number	Name (Last, First)	Agency/Organization	Date Received
183.	Surdyke, Scott		4/11/11
184.	Suver, Joanne		4/11/11
185.	Symonds, Drew		4/11/11
186.	Tangen, John		4/07/11
187.	Thordarson, Michelle		4/08/11
188.	Timpson, E. Diana		4/11/11
189.	Trainer, Steve	9 <sup>th</sup> Avenue Investors	4/11/11
190.	Tung, Beatrice		4/09/11
191.	Turner, John	PEMCO Insurance	4/11/11
192.	Tweedale, Kelly	Seattle Opera	4/11/11
193.	Twill, Jason		4/11/11
194.	Umali, Tino		4/11/11
195.	Van Til, Steve		4/11/11
196.	Vice, Jodie		4/03/11
197.	Walker, Dewey		4/06/11
198.	Warren, Robert. P.		4/11/11
199.	Waymire, Jim	Waymire Consulting	4/11/11
200.	Weber, Brandon G.	CBRE	4/08/11
201.	Williams, Susanna		3/10/11
202.	Winges, Linda D		4/11/11
203.	Wood, Stephen	Century Pacific	4/06/11
204.	Yamamoto, Julianna		4/10/11
205.	Yamamoto, Mike		4/10/11
206.	Zak, Gary		4/11/11

Source: EA|Blumen, 2011.

## 4.2 Responses to Comments

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Each of the comment letters listed in Section 4.1 is provided a response in this Section 4.2. Distinct comments are numbered in the margins of the written comments or testimony corresponding to the numbered response in **Table 4-2**.

Comments that state an opinion or preference are acknowledged with a response that indicates the comment is noted and forwarded to the appropriate decision-makers. Comments that ask questions, request clarifications or corrections, or are related to the Draft EIS are provided a response which explains the approach, offers corrections, or provides other appropriate replies.

*Public Comments*

**Responses to  
Comments**

Chapter 4 Contents

## Comment Letters 1-5

Public Agencies	
1.	Timmerman, Carter
2.	Greve, Darren
3.	Freeman, Ketil and Belz, Sara
4.	Graves, David
5.	Wilson, Barb



**Washington State  
Department of Transportation**

**Paula J. Hammond, P.E.**  
Secretary of Transportation

**Transportation Building**  
310 Maple Park Avenue S.E.  
P.O. Box 47300  
Olympia, WA 98504-7300  
360-705-7000  
TTY: 1-800-833-6388  
www.wsdot.wa.gov

April 11, 2011

Jim Holmes  
Senior Urban Planner  
City of Seattle, Department of Planning and Development  
PO Box 34019  
Seattle, WA 98124-4019

RE: Draft Environmental Impact Statement (DEIS) for the *South Lake Union Height and Density Alternatives*, February 2011

Dear Mr. Holmes,

Thank you for the opportunity to provide comment on the Draft Environmental Impact Statement (DEIS) for the *South Lake Union Height and Density Alternatives*, February 2011. We recognize the substantial time and resources invested in this DEIS. We request that our comments be made part of the public record.

1

As stated in our December 15, 2008 and February 3, 2011 correspondence, WSDOT Aviation is concerned that the proposed density and allowable building heights within the established airspace corridor for Kenmore Air Harbor Seaplane Base (SPB), could affect the ability of the airport to function as an essential public facility.

2

WSDOT has reviewed the (DEIS) for the *South Lake Union Height and Density Alternatives* and offers the following clarifications, observations, and recommendations:

- Objects that are too tall may constitute airspace hazards within the known flight corridor of the seaplane landing area on Lake Union. By holding objects to heights that remain below the established airspace corridor's approach and departure and safety buffer, the City of Seattle can discourage airspace hazards that endanger pilots, passengers and people in the vicinity of the established airspace corridor. (3.8-32)
- The red X, depicted in Figure 3.8-1, identifies the area where aircraft typically leave the runway. Many variables may change the actual runway departure point. Some variables include: boat traffic, aircraft traffic, piloting characteristics, aircraft capabilities and weather conditions. (3.8- 32 and 33)
- Figure 3.8-1 FAR 77 shows the approach/departure surface diagram developed by Airside Consulting. The figure depicts the established airspace corridor for air operations from Kenmore Air Harbor's runway on Lake Union, as compared to the approach and departure airspace as described in Title 14 of the FAA's FAR Part 77 'Imaginary Airspace Surfaces'. In this case the metric was designed to show airspace needs for sea plane operations from the Lake Union facility.

3

4

5

Jim Holmes  
(DEIS) *South Lake Union Height and Density Alternatives*  
April 11, 2011

- WSDOT does not have local land use jurisdiction, but does provide technical assistance to local jurisdictions and airport operators. WSDOT relies on local jurisdictions, with land use authority, to keep critical airspace clear of obstructions. RCW 36.70.547 and RCW 14.12 gives local jurisdictions the authority to develop and adopt airspace regulations. (3.8-33) | 6
- Allowable building heights are limited by the local land use authority, not the FAA. (3.8-42)
- Rooftop apparatus such as, but not limited to, antennae, flag poles and towers should be prohibited from penetrating the proposed vertical safety buffer and/or airspace surfaces developed for the seaplane base runway on Lake Union. | 7
- WSDOT supports the establishment of a vertical buffer below the approach surface to ensure safe aircraft operations and to minimize impacts associated with normal aircraft operations. The City of Seattle should perform a risk assessment to determine the appropriate vertical buffer. | 8
- WSDOT supports the quantitative wind modeling of the proposed building heights and established airspace corridor. It is clear that further analysis and consideration is required. | 9
  - The analysis should address the potential impacts to the airport's fleet mix, including, but not limited to, critical aircraft and aircraft performance. The analysis should consider operations from Kenmore Air, Seattle Seaplanes, and itinerant seaplane operators using landing area on Lake Union.
  - The analysis should consider all types of weather conditions.

Thank you again for the opportunity to provide technical assistance and comment on this important issue. WSDOT remains available to assist the City of Seattle in adopting comprehensive plan amendments and development regulations that discourage the encroachment of incompatible land use adjacent to public use airports.

Please don't hesitate to contact me at 360-651-6312 or [timmerc@wsdot.wa.gov](mailto:timmerc@wsdot.wa.gov) if you have any questions or concerns.

Jim Holmes  
(DEIS) *South Lake Union Height and Density Alternatives*  
April 11, 2011

Sincerely,

A handwritten signature in cursive script that reads "Carter Timmerman". The signature is written in black ink and is positioned above the printed name.

Carter Timmerman  
Aviation Planner/ GIS Analyst  
WSDOT Aviation Division



**King County**

Darren Greve  
Department of Natural Resources & Parks  
201 So. Jackson St., Suite 600  
Seattle, WA 98104

April 11, 2011

Jim Holmes  
Seattle Department of Planning and Development  
700 Fifth Ave, Suite 2000  
PO Box 34019  
Seattle, WA 98124 - 4019

Dear Jim,

Please include these comments in the official record of comments received regarding the South Lake Union Draft Environmental Impact Statement (DEIS). | 1

As you know, King County has been working with the City of Seattle since early 2009 to renew a rural TDR program that would allow rural transferable development rights (TDRs) to be a component of the City's incentive zoning structure for South Lake Union.<sup>1</sup> | 2

Regional or rural TDR (i.e. County-to-City) in South Lake Union represents an opportunity to link redevelopment with the creation of open space and parks both *inside* and *outside* the South Lake Union (SLU) neighborhood, while mitigating for the impacts of greenhouse gas (GHG) emissions associated with development particular to the alternatives in the DEIS.

The City acknowledged this link in July 2009, when the Seattle City Council passed Resolution #31147 which states the Council's support of a rural TDR program focused on preserving rural farms that provide locally grown food to Seattle farmers markets, restaurants and retailers. The Resolution further identifies South Lake Union as one of the best candidate TDR receiving sites.

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<sup>1</sup> Seattle and King County entered into a previous TDR interlocal program for the Denny Triangle; the TDR agreement ran from 2001 – 2008.

This is clear evidence the City is thinking beyond its immediate boundaries to its connection with the region and the places that contribute to Seattle's quality of life and make the City an attractive place to live. In addition, DPD's final December 2010 South Lake Union Urban Design Framework document identifies regional TDR as a potential opportunity for incentive zoning.

2 cont

However, as currently drafted, the DEIS does not mention regional TDR or account for the GHG and open space mitigation opportunities that a regional TDR component can provide SLU development alternatives.

3

In its most basic form, a renewed Seattle-King County regional TDR program would allow developers in SLU to purchase a fixed number of rural development rights in exchange for a fixed amount of increased development capacity/floor area ratio per the City incentive zoning. In exchange, King County would invest in certain amenities in the SLU neighborhood.

In regards to GHG mitigation, a regional TDR program will directly and quantifiably reduce greenhouse gas emissions associated with increased SLU development. A regional TDR program relocates development potential out of distant rural areas into existing urban areas – like the Bel-Red Corridor in Bellevue and South Lake Union in Seattle. Distant rural development produces greater per household (and per person) VMT-related GHG emissions than does new urban development. This is well-known, and there is documented data based on Puget Sound Regional Council (PSRC) travel shed studies.

4

The delta between the GHG emissions from a potential dwelling unit in the rural area and its urban counterpart represents the mitigation potential that regional TDR will provide. For example, in the previous Seattle-King County TDR program, the 70 development rights transferred into the Denny Triangle<sup>2</sup> from important properties in Seattle's watershed were estimated to reduce VMT-related GHG emissions by 50,000 metric tons of CO<sub>2</sub>.<sup>3</sup>

A regional TDR component to SLU incentive zoning will similarly reduce impacts from GHG emission associated redevelopment, and should therefore be considered a potential mitigation strategy in the DEIS.

In regards to open space mitigation, the DEIS indicates increased demand for parks and open spaces associated with development under the alternatives. A regional TDR component to SLU incentive zoning will bring up-front investment, and a stream of payments as TDRs are sold, by the County for open space and park amenities in South Lake Union. In this way a City-County TDR program is also an in-city open space/park mechanism to mitigate for increased density, and should be identified as such in the DEIS.

5

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<sup>2</sup> These 70 development rights created 900 acres of land protection along the Cedar and Tolt rivers – the City's water supply

<sup>3</sup> Based on 2006 PSRC Travel-shed data. Numbers were derived using PSRC VMT information at the census block level of where the development rights were transferred from and where they were used for development capacity (i.e. the Denny Triangle).

In closing, King County would hope to see in the Final EIS for South Lake Union the mitigation opportunities that a renewed Seattle-King County regional TDR program will provide.

Sincerely,

A handwritten signature in black ink, appearing to read "Darren Greve". The signature is stylized with a large initial "D" and a long horizontal stroke at the end.

Darren Greve  
King County TDR Program  
Phone: (206) 263-0435  
email: [darren.greve@kingcounty.gov](mailto:darren.greve@kingcounty.gov)



Legislative Department  
Seattle City Council  
Memorandum

**Date:** April 11, 2011  
**To:** Jim Holmes, Department of Planning and Development  
**From:** Ketil Freeman & Sara Belz, Council Central Staff  
**Subject:** *South Lake Union Height and Density Alternatives*, Draft Environmental Impact Statement

**Draft Environmental Impact Statement Comment**

This memorandum is a comment by Council Central Staff on incentive zoning provisions discussed in the *South Lake Union Height and Density Alternatives Draft Environmental Impact Statement*.

- 1. In 2009 Council passed Resolution 31147, which states the Council’s support for renewed participation in King County’s rural transferable development rights program. Resolution 31147 also identifies rural King County farms and dairies that supply Seattle’s farmer’s markets as preferred sending sites and identifies the South Lake Union Urban Center as one of the best candidates for receiving sites. Additionally, the City received a Department of Commerce grant to study the feasibility of creating a new program in the South Lake Union Urban Center and elsewhere in the City.

1

Collateral benefits to rural transferable development rights programs include 1) reduced future travel – and associated emissions – from rural and ex-urban areas to major regional employment centers, such as downtown Seattle and the South Lake Union Urban Center itself; and 2) infrastructure grant funds from King County to design or develop neighborhood amenities in development rights receiving areas, such greenstreet improvements on 8<sup>th</sup> Avenue or Harrison Street.

Please provide a discussion in the *Climate Change and Greenhouse Gas Emissions and Open Space and Recreation* affected environment sections of the potential mitigation associated with participation in King County’s rural transferable development rights program and describe a rural transferable development rights program in the description of incentives in Section 2.3.2.

- 2. In 2009 the City created the Pike / Pine Conservation Overlay District in Seattle Municipal Code Chapter 23.73. One purpose of the district is to preserve “character structures” by providing incentives for retaining those structures in new development. Other strategies discussed by Council include creating a program whereby an identified character structure in the overlay could transfer unused development capacity to sending sites in the South Lake Union Urban Center. Please discuss the potential for this program in the description of incentives in Section 2.3.2.

2

cc. Council President Richard Conlin, Councilmember Sally Clark, Councilmember Tom Rasmussen



City of Seattle  
Seattle Parks and Recreation

April 11, 2011

Seattle Department of Planning and Development  
Attn: James Holmes  
700 Fifth Ave., Suite 1900; P.O. Box 34019  
Seattle, WA 98124-4019

Sent via e-mail: [southlakeunioneis@seattle.gov](mailto:southlakeunioneis@seattle.gov)

Re: South Lake Union Height and Density Alternatives – Draft Environmental Impact Statement

Seattle Parks & Recreation (Parks) appreciates the opportunity to provide comments on the South Lake Union Height and Density Alternatives Draft Environmental Impact Statement (DEIS). Increased development capacity will encourage the continued developing urban environment in the South Lake Union neighborhood. That said; Parks has serious reservations regarding potential shading impacts on both Cascade Playground and Lake Union Park with the future increased building heights. The following are more specific comments on the DEIS.

- 1-19: Aesthetics – There is no mention of potential shadow impacts on Cascade Playground or Lake Union Park. Increased building height will potentially create shadows that cover park properties in South Lake Union, negatively impacting park users. Shadow impacts could be significant as shadows could completely cover Cascade Playground and/or Lake Union Park at certain time(s) of the day. 1
- 1-27: Open Space and Recreation – There is no discussion of potential shadowing of Cascade Playground and/or Lake Union Park and potential impacts on park users.
- 3.10-86: The DEIS states that “[d]uring the winter months, building shadows would cover all or a majority of the three parks in the morning and Lake Union and Cascade Parks in the afternoon. Shadows at noon in winter are expected to have minimal impact on Denny and Lake Union Parks, but may cover up to 60 percent of Cascade Park and Playground. Although this is the season when sunlight is typically obscured by clouds/poor weather in our region, the noontime shadows could impact the children’s play area on the west side of the block.” Given these potential impacts to Parks’ property and park users, specific mitigation measures should be proposed to minimize potential future shadow impacts. 2
- 3.16-1: The discussion of Lake Union Park implies that the park is still under construction. Construction was completed in September 2010 and the park is complete and operational. This section should be updated to represent the conditions today. 3
- 3.16-2/Table 3.16-2: The Cheshiahud Lake Union Loop, a 6.2 mile multi-use corridor around Lake Union which connects parks, open spaces, street-ends and neighborhoods around the lake, is not listed in the table of existing Parks and Open Spaces. The 4

❖ Planning and Development Division ❖

800 Maynard Avenue South, 3<sup>rd</sup> Floor, Seattle, Washington 98134-1336  
Tel: (206) 233-3872, Fax: (206) 233-3949

- Cheshiahud Loop provides a recreation amenity to the South Lake Union neighborhood and should be included. | 4 cont
- 3.16-6: The DEIS lists potential improvements to Denny Park including a children's play area. A new children's play area was completed in the Northeast corner of Denny Park in 2009. This section should be updated accordingly to represent the conditions today. | 5

Building heights on parcels adjacent to parks in South Lake Union should be closely considered to provide the maximum solar exposure to Cascade Playground and Lake Union Park and to minimize the potential significant adverse shadow impacts on Parks' property and park users. Thank you for your consideration of these comments as you prepare the Final EIS. If you have any questions regarding these comments, please contact me at 206.684.7048 or [david.graves@seattle.gov](mailto:david.graves@seattle.gov). | 6

Regards,



David Graves, AICP  
Senior Planner  
Planning & Development Division  
Seattle Parks & Recreation



# City of Seattle

## Seattle Planning Commission

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April 11, 2011

Diane Sugimura, Director  
 City of Seattle Department of Planning and Development  
 700 Fifth Avenue, Suite 2000  
 PO Box 34019  
 Seattle, WA 98124-4019

### RE: South Lake Union Draft Environmental Impact Statement

Dear Ms. Sugimura,

The Planning Commission would like to thank you for the opportunity to provide our comments and recommendations on the South Lake Union Height and Density Alternatives Draft Environmental Impact Statement (DEIS). We support the City's ongoing planning work in this neighborhood, which helps implement the neighborhood plan that was adopted in 2007. This letter provides our overall comments about the DEIS; more detailed comments about chapter 3 – affected environment, significant impacts, mitigation measures and unavoidable adverse impacts are **attached**.

While the neighborhood has seen welcomed commercial growth in recent years, most recently 460,000 square feet being leased by Amazon, residential growth has achieved only 20 percent of the residential growth target for 2024 established in Seattle's Comprehensive Plan. South Lake Union Urban Center boasts wonderful proximity to downtown and the University of Washington, great opportunity for open space plus recent and planned transportation investments. All of these factors lay a framework for South Lake Union to be a vibrant mixed use neighborhood achieves far greater numbers of residents and jobs, particularly in the biotech, medical, and high-tech research and development sectors.

To achieve the full benefits of a transit community (fewer per capita vehicle miles traveled, reduced carbon emissions, lower transportation costs for residents, etc.), we recommend future land use strategies that focus on increasing residential development to create the planned mixed use center envisioned in the Comprehensive Plan and the South Lake Union neighborhood plan.

The alternative development scenarios evaluated in the DEIS set the stage for zoning changes that should support growth that is more balanced between residential and commercial uses, and will create the vibrant mixed use transit community envisioned. Balanced growth will help South Lake Union become a livelier and flourishing transit community, which will help achieve numerous benefits as outlined in our recently released report: Seattle Transit Communities – Integrating Neighborhoods with Transit. Our specific recommendations for South Lake Unions from that report are **attached**.

As a regional growth center, South Lake Union plays “a unique and important role<sup>1</sup>” in the future of central Puget Sound. Integrating land use changes with the City’s significant transportation investments in the Mercer Corridor and the streetcar will help achieve local and regional goals. The crucial land use decision will be how to shape this growth. We believe that the existing zoning will not be conducive to meeting the housing goals for SLU, and that increased height and floor areas will open the area to more private investment in housing along with the commercial development we have been seeing. This will result in lower GHG emissions per person and acre and help us achieve our future goals to become carbon neutral.

2

The growth encouraged by increased height must be balanced with essential components of livability that are targeted to the needs of the community, such as strategic mid-block pedestrian connections, wide sidewalks, bike facilities, public plazas and green open spaces, schools, and community facilities.

3

Conversely, allowing for taller buildings in key locations throughout the neighborhood will result in building forms that can better accommodate plazas, wider sidewalks, midblock crossings, and other livability components like parks, community centers, and schools. The alternatives evaluated in the South Lake Union Draft Environmental Impact Statement set the stage for changing the form of this neighborhood. Overall, the Planning Commission supports these anticipated changes. We believe the objective of encouraging a better balance of residential and commercial growth could be clarified and emphasized in the description of the project in the EIS.

4

As the City moves forward with zoning changes and other land use actions we urge incorporating a variety of building heights and forms that will promote greater residential density, urban design that encourages a wider range of building types, and incorporating tools and incentives for affordable housing, open space and other essential components of livability.

5

Thank you for the opportunity to provide you with our recommendations regarding the South Lake Union Height and Density Alternatives DEIS. We look forward to assisting you as the process advances. Please contact me or our Director, Barbara Wilson at (206) 684-0431 if you have further questions.

Sincerely,



Josh Brower, Chair  
Seattle Planning Commission

cc: Mayor Mike McGinn  
Seattle City Councilmembers  
Darryl Smith, Ethan Raup, Julie McCoy, Liz Birkholz, Rebecca Deehr; Mayor's Office  
Marshall Foster, John Skelton, Jim Holmes; DPD  
Peter Hahn, Bob Powers, Tracy Krawczyk, Barbara Gray, Eric T'weit, Tony Mazalla; SDOT  
Rebecca Herzfeld, Norm Schwab; Council Central Staff

**SEATTLE PLANNING COMMISSION RECORD OF DISCLOSURE & RECUSAL**

- Commissioner Matt Roewe recused himself from this matter.
- Commissioner Colie Hough Beck disclosed that she lives and works in South Lake Union, and that the firm she works for, HBB, has contracts with Seattle Parks, SPU, SDOT (the Mercer Corridor Improvements Project in SLU) and FOLKpark. HBB also works on multifamily and commercial projects in the city.
- Commissioner Josh Brower disclosed that his firm, Brower Law, represents developers and owners of single-, multifamily and commercial projects in the area. He also represents industrial businesses working on freight and mobility issues in Seattle.
- Commissioner Amalia Leighton disclosed that her firm, SvR Design did some storm water/sewer capacity analysis for the EIS.
- Commissioner Catherine Benotto disclosed that her firm, Weber Thompson has an office in South Lake Union, that they work for developers and the City in this area and a member of the firm serves on the South Lake Union Community Council.
- Commissioner Martin Kaplan disclosed that his firm Martin Henry Kaplan, Architects AIA has completed projects in SLU and may so in the future; and he has sat on and currently sits on several committees that serve South Lake Union.

<sup>1</sup> Vision 2040, page 48.

**Seattle Planning Commission**  
**South Lake Union Draft Environmental Statement Comments**  
April 11, 2011

**Chapter 3: Affected Environment, Significant Impacts, Mitigation Measures, and Unavoidable Adverse Impacts**

**3.1 Geology and Soils**

This section clearly documents existing conditions. Site-by-site analysis and engineering is appropriate as redevelopment occurs.

- 3.1-5 Mentions potential groundwater but does not identify whether some alternatives would have more potential to include below-grade structures, and what effects this could have on other buildings in the area. In some areas where peat has been displaced by garages, groundwater levels have risen on adjacent properties. | 6
- 3.1-6 Identifies liquefaction as a potential impact but does not examine the impacts on people who live in the area in the event of an earthquake - loss of road access, utility disruption, etc. All alternatives that raise density increase the risk of exposing people to loss of the use of homes for at least a period of time. Building codes are designed to save lives but not to prevent any damage or even for the building to remain usable after a major quake. | 7

**3.2 Air Quality**

The Health Planning Area in which the study area is located experiences a higher prevalence of asthma among adults versus King County as a whole (8.7% vs 8.4%). This may be linked to particulate matter, ozone, and other factors that degrade air quality. Consider encouraging “breathe easy” homes in multifamily developments. | 8

- 3.2-4 Recently, with the increase in restaurants which burn wood for cooking (i.e. pizza), concerns have been raised over commercial wood burning and potential impacts to air quality. |

**3.3 Water Quality**

Generally, this section is fine. Consider impacts of Green Factor, green roofs, and other vegetation on water quality. Describe the anticipated impacts of the Mercer Corridor Improvements on water quality. In 2005, there was a study that provided exemptions to certain parcels based on their proximity to the new CSO facility. Confirm with SPU whether these exemptions remain valid or are overridden by the new stormwater code. We are concerned about the water quality in Lake Union from storm water runoff and the effects the alternatives may have upon it. We would like the EIS to address treatment and/or mitigation options. | 9

- 3.3-3 Quantify the project area discharging to separate storm vs. combined. |

**3.4 Plants and Animals**

While the proposed alternatives would not directly result in impacts to plant and animal habitat, potential mitigation measures could include open space for vegetation, migrating animals, and human enjoyment, which would also enhance health and livability. | 10

### **3.5 Environmental Health**

Recognize the positive outcome of Alternative 1 with the higher excavation requirements and benefits of removal of hazardous materials.

11

### **3.6 Noise**

Discuss the effects of additional housing density near the major noise sources – I-5 and SR 99. Consider how these areas would treat housing density incentives, since residential development would either expose people to more environmental noise, or could force them to live in housing with the windows closed.

12

- 3.6-1 Noise can be linked to negative human health through stress, hypertension, sleep deprivation, etc. This is particularly true when exposed to noise for extended periods of time.
- 3.6-11 In general buses (particularly diesel) tend to be noisier than cars, with Alternative 1 there would likely be increases in bus service which may negatively impact noise levels along arterials.

### **3.7 Climate Change and Greenhouse Gas Emissions**

No significant comments. This section describes the process by which GHG are to be measured as well as lists appropriate mitigation strategies.

- 3.7-3 Transit and walkability should be described as an additional mitigation strategy.

13

- 3.7-2 The measurement of GHG and the metrics associated with determining environmental impacts should consider that higher densities, as proposed, produce less GHG per capita. Indeed, it would be important to compare the impacts of development in other Seattle neighborhoods, at significantly much less densities, with projected GHG and other environmental impacts. This measures would help us understand how SLU can accommodate future growth with the least footprint.

14

In addition, it appears that GHG and VMT calculations are only related to comparing impacts between alternatives. While this comparison is important in evaluating each alternative in relationship to each other, another approach would be to compare these growth targets as compared to other neighborhoods in order to better evaluate where targeting the predicted jobs and housing growth will best help us achieve our goal of becoming carbon neutral.

### **3.8 Land Use**

No significant comments. This section focuses on the air travel path. We note that the flight path, controlled by federal and state regulations, limits the height of future development. While all action alternatives would be able to accommodate anticipated 2031 growth targets, the taller heights allowed in Alternatives 1 and 2 may be appropriate outside of the flight path to maximize development opportunities.

15

- 3.8-1 This section should include a detailed study of the economics behind the projections. By 2031 the number of sites that can and may be developed with significant height increases may be much less than what is illustrated in the models.

16

3.8-9 The discussion of growth expected does not examine what proportion of recent growth has gone to South Lake Union, it only discusses goals and how the goals are likely to be increased. The neighborhood has accommodated 8% of the citywide residential growth, while the target was 17%. 17

3.8-10 The assumptions on page 2-7 regarding the 2031 growth target describe the target as a "conservative" approach. However, it is important to note that because this target is as high as could be expected, the conclusion is that the existing zoning would fall short of achieving it. While it may be desirable to increase the capacity of this area for the purposes of the real estate market, decision makers should be cautioned that in this instance, the "shortfall" is an artifact of the EIS process (using the worst case assumption for traffic and other analysis) and not a policy shortfall per se. 18

### **3.9 Housing**

3.9-6 Description of existing and expected demographic characteristics of the neighborhood would be useful here. For example, the low household sizes of employees in companies like Amazon likely leads to higher demand for housing units. Also, the estimate of 350 SF of commercial space per job likely overestimates space per employee in companies like Amazon. Therefore, there are likely to be more employees/jobs and higher demand for units than are estimated. 19

### **3.10 Aesthetics**

3.10.2 Potential aesthetic impacts considering potential properties available for development should be analyzed in relationship to economic projections of growth and the absorption rate of new residential and commercial square footage. As is explained on page 3.10.8, the 2031 build-out models may offer an overly optimistic prognostication of the future construction over the next 20 years. 20

Figure 3.10-1 The Lake Union Seaport Airport Flight Path impacts development opportunities and the EIS should address this by explaining how these standards compare to the concept plans previously presented by the City. The limits on building heights in the flight path with regard to proper, safe, and sustained accessibility should be accounted for in the future district-wide land use strategies. 21

3.10-6 New open space is critical to the visual success of proposed height increases, particularly under Alternative 1; open space should be a component of a height bonus. The computer models for Alternatives 1-3 highlight the need for this open space at grade. It is not the height of the building that is the aesthetic issue, it is the unbroken base at pedestrian level. 22

3.10-17 Alternatives 1-3 propose the potential for a tall building to be on a bulkier podium that might fill the block. The computer images provide a graphic argument for requiring open space at grade for developments that take up most of the block. Breaking up this lower bulk is critical to how pedestrians will experience the neighborhood. 23

In all Alternatives, to varying degrees, a negative impact is described as extending the downtown skyline to the shores of SLU. Seattle has a small downtown area of tall buildings compared to other cities, particularly as seen in the context of Elliot Bay. Therefore, this extension of the skyline to SLU is not necessarily a negative. It can be dramatic and with this

newer building type, give the city, and the neighborhood, much a distinctive character this is different from other neighborhoods. The area will change and it will likely be better. | 23 cont

3.10-39 There are comments throughout about new development making an abrupt transition in height with existing development. Since the majority of SLU is surface parking lot or one story buildings, this is unavoidable. Seeing this as a negative impact requiring mitigation strategies is debatable as the variety in height is often what gives a city interesting character. | 24

### **3.11 Historic Resources**

Both the Historic Resources (3.11) and Cultural Resources (3.12) are detailed and cover potential issues that came to mind. A possible mitigation for Historic Resources could be to establish a Historic Overlay that creates a corridor connecting the major sites in the area. | 25

### **3.12 Cultural Resources**

Both the Historic Resources (3.11) and Cultural Resources (3.12) are detailed and cover potential issues.

### **3.13 Transportation**

Please include the correct "source" for information shown in figures. In many cases the source of the information is not the consultant, but rather SDOT, the Comprehensive Plan, Pedestrian Master Plan, King County Metro, etc. | 26

3.13-2 Using a multi-modal model to evaluate transportation impacts of future land use scenarios seems like a better method than traditional ITE models in an urban mixed-use setting like South Lake Union. Perhaps the model could be explained more to articulate why the mode split does not change much among the alternatives. Comparison of average daily trips under the alternatives could further illustrate the difference between mode share if midblock connections, wide sidewalks, etc. are created. | 27

Table ES2: Auto trips are not equivalent to person trips, yet auto trips are compared to person trips relative to mode share. This may not accurately portray the relationships. Since auto trips contain at least one person trip, but by definition a pedestrian or bicycle trips and a transit trip is counted as one trip, the mode share for auto trips will be greater than the percentage included in these tables. Person trips should be used as the metric to compare and to calculate mode share percentage. Please identify what is included in the "internal" category of trips. | 28

3.13-10 *Figure 2* While text on page 3.13-6 describes this as showing pedestrian facilities in the area, the figure shows Pedestrian Issues and Pedestrian Features, not a complete inventory of Pedestrian Facilities (which it should contain). Highlighting key areas of concern should be included on a separate map if too cluttered on one map. | 29

3.13-12 *Regional access* I-5 section attributed congestion to intense land use in Downtown Seattle. It is likely that there is a significant component of regional trips that bypass Downtown Seattle. | 30

3.13-17 *Off-Street Parking* cites 2006 data, which is pretty old, especially considering the land use transformation that has occurred since then. If more recent data is not available, a footnote should be included to diminish the relevance of this information as an "existing condition". | 31

3.13-19 *On-Street Parking* Confirm quoted "current" time limits and parking rates. | 32

3.13-43 <i>Transit assumption</i> what about King County Metro as a resource for information?	33
3.13-44 So it is not reasonably foreseeable that any pedestrian and bicycle projects would be complete and included in the 2031 transportation network assumptions?	34
3.13-49 The innovative MDX travel demand model was developed from “over 200 mixed use development sites”. South Lake Union is larger than a “development site” so can the model be accurately applied in this setting or should any caveats be noted?	35
3.13-52 The chart is helpful, but it is not clear how these numbers relate either to the 2031 targets or the development capacity discussed in tables 2-1 and 2-. Do any tables show how much development was assumed for each alternative?	36
3.13-54 <i>Table 8</i> shows a remarkable consistency among alternatives, suggesting that increased density would not affect mode share. (The margin of error is not mentioned, but one would assume it is at least +/- 1%.) Is this because the higher incomes of new residents and workers would bring with them higher rates of access to autos and therefore any gains from density are offset by the demographic trend?	37
3.13-76 Differences, if any, of short-term parking impacts among action alternatives are not clear.	38
3.13-82 Additional pedestrian and bicycle projects could include: adding and improving connectivity between South Lake Union and Capitol Hill; and improve the quality of bicycling by ensuring that bicycle routes and striped bicycle lanes have smooth pavement and are regularly swept of debris.	39
<b>3.14 Public Services</b>	
South Lake Union is a relatively low-crime and low emergency response call area; fire and police response should be adequate to accommodate growth. Potential for major liquefaction damage to infrastructure and housing discussed on geology/soils above is also not discussed here.	40
3.14-5 Two fire stations are identified as scheduled for Levy upgrades in 2010. According to the City’s website, the upgrades to <i>Fire Station 7</i> and <i>Fire Station 25</i> are scheduled to be completed in 2013 and 2012 respectively.	41
<b>3.15 Utilities</b>	
Some of these items are likely being improved as part of the Mercer Corridor Improvements; it would be a good time to make improvements if they are not already being made.	42
3.15-3 Will there be improvements to the sanitary sewer system as part of the Mercer Corridor Improvements?	43
3.15-6 The existing capacity of the electrical system is not mentioned. Have the issues around higher demand for biotech uses been resolved?	44

**3.16 Open Space and Recreation**

There is not much discussion of the distribution of open space within the boundaries of SLU. While the total area of parks and open space may exceed the minimum standards used across the entire city, the distribution of open space does not meet the requirements of LEED ND, a certification being pursued by the City for SLU. The ND requirements should also be considered. Where it falls short, is having public space within 1/4 mile walk for 90% of residents. Particularly, as density increases the need for public space increases, not just through an increase in population, but to give more breathing room around taller buildings and contribute to livability. Using the ND criteria, nearly every block would need an open space of at least 1/6 an acre/7000 sf. A review of ND requirements should be made with City Green Building and the Office of Sustainability and Environment.

45

3.16-3 The list of existing facilities includes Denny Park/Playfield. 3.16-1 clarifies that Denny Playfield is a private owned temporary recreation facility that is proposed for private development. Please clarify that Denny Playfield is not included in the 15.7 acres of usable open space when calculating the ratio of useable open space.

46

3.16-5 *Exhibit 3.16-1* includes park and recreation facilities accessible from SLU and that are within the 1/8 mile service area. There are major obstacles on the east side of SLU: I-5 plus a major topographic change between SLU and Capitol Hill. It is not realistic to count on those parks and open space areas as major contributors to the SLU neighborhood.

47

3.16-9 *Mitigation Strategies* There should be more discussion about how much area a bonus is likely to provide and if it will achieve the results desired under LEED ND. Recommendations for filling the gaps seem weak and may not be in the area where most desired - there seems to be a lot of area not covered as accessible to Denny Park, Cascade Park, and SLU Park. In addition, privately owned open space was not considered and should be part of the analysis as private developers are the likely providers of future open space, particularly through a bonus program. These are the types of spaces that make the area more livable. Stronger recommendations to ensure they happen with any development are needed. Make provision for open space mandatory with any height bonus.

48

The EIS also states there are sufficient major facilities in or near the SLU area, but this number will fall short with the proposed alternatives. Increased development will be incremental and if the open space and recreation facilities don't keep up with development there will be a shortfall. There are gaps in the system in SLU that have been identified. Open space and breathing room should be evenly distributed throughout the SLU neighborhood and closely associated with housing developments in the form of expanded sidewalks, plazas, and pocket parks. With alternatives 1-3, the EIS should consider requiring a minimum of one to two park facilities per block to provide even distribution and close the gaps. Parks and open space should also align and compliment transit facilities where possible. An even distribution of park facilities would reduce the over use of existing facilities as described in the EIS.

49

One concept mentioned in the EIS is tax revenues generated from future development which would accrue to the City of Seattle. If this revenue is collected in SLU it should be reinvested in SLU for park and recreation facilities.

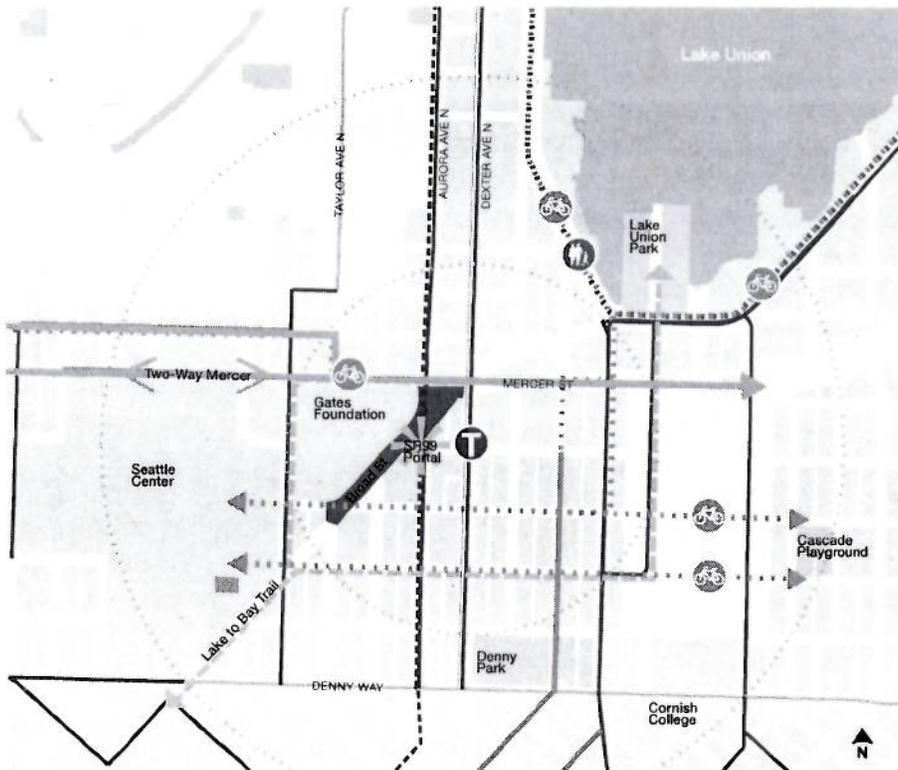
50

Another mitigation concept described in the EIS provides park and recreation facilities in conjunction with future development as part of a bonus system. This only works if these facilities are connected with the right of way and are designed and clearly identified as public spaces.

51

# South Lake Union

South Lake Union is a burgeoning employment center focused on biotech, medical research, and internet commerce industries. This transit community is also a growing urban residential neighborhood and has been a focus of policy level planning for a number of years. Development pressure and market desirability are likely to remain relatively high. Transformational momentum has started with the addition of the new park, the South Lake Union Streetcar, and the Mercer Corridor project. The Commission recommends the development of an Urban Design Framework/Implementation Plan.



## KEY ACTIONS

Use the urban design framework to coordinate SR-99 and Mercer Corridor projects, Thomas Street redesign project, Lake-to-Bay trail, and the buffered bike lanes proposed on Dexter. Follow up with appropriate rezones and a strong implementation plan.

Promote high-density development around walkability and livability.

Improve streetcar service with shorter headways. Connect route to the First Hill Streetcar once implemented.

Improve east-west connections to Seattle Center, Uptown, and Lake Union.

Consider narrowing 8th and 9th Avenues, Thomas and John Streets and widening sidewalks to enhance public realm. Make better use of Dexter's wide right-of-way.

Encourage development of workforce housing and family-sized units.

Install essential infrastructure including community center, library, senior center, daycare, and schools, public plazas and open space, and mature street trees.

Develop an open-space plan that provides for public plazas, mature street trees, pocket parks and kid-friendly areas. Consider city-owned land for this purpose.

## LEGEND

- Mixed Use Center
- Mixed Use Neighborhood
- Special District
- Industrial Job Center

key transit station

### frequency of transit service

- <15 min. existing
- <15 min. planned
- >15 min. existing

gateways / opportunities

bike connections

pedestrian connections

key pedestrian frontage

key potential redevelopment

key intersection

### approximate walkshed (in minutes)



### zoning & land uses

- single family
- multifamily: lowrise
- multifamily: mid/highrise
- mixed use
- commercial
- institutional
- industrial
- civic buildings
- open space
- waterbodies

Table 4-2

Responses to Public Comments Received During the Comment Period

Comment Number	Response
<b>Letter 1: Timmerman, Carter</b>	
1	<b>Public Record.</b> All comments contained in this letter are included as part of the public record.
2	<b>Airport Function.</b> The comment is noted. Please refer to changes to the discussion of the flight path that are contained in this Final EIS, which address these issues.
3	<b>Building Height and Airspace Hazard.</b> The comment is noted. Please refer to changes to the discussion of the flight path that are contained in this Final EIS, which address these issues.
4	<b>Runway Departure Point.</b> It is acknowledged that the runway departure point identified in Draft EIS Figure 3.8-1 represents a typical, but not fixed, point of departure.
5	<b>Approach/Departure Surface.</b> The comment is noted. Please refer to the description of the revised approach/departure surface in Final EIS Chapter 2.
6	<b>Land Use Jurisdiction.</b> The comment is noted. Changes regarding the flight path address this issue. Seattle regulates airspace considerations through the City's Land Use and Zoning Code (Title 23).
7	<b>Rooftop Apparatus.</b> The comment is noted. The Draft EIS contains a mitigation strategy that addresses limiting rooftop appurtenances that could penetrate the flight path airspace or safety buffer.
8	<b>Vertical Buffer.</b> The comment is noted. The Draft EIS contains a mitigation strategy that addresses the vertical safety buffer. In addition, please see the response to Comment 9 in this letter, below.
9	<p><b>Quantitative Wind Modeling.</b> The comment is noted. This programmatic EIS included a qualitative analysis of potential wind impacts. From a quantitative perspective, numerous factors will affect wind patterns in an urban area. The most critical of these relate to: building height, location, orientation, and massing. At the subarea level of analysis, it is impossible to accurately forecast these factors for all development that may occur within the subarea. Therefore, the programmatic analysis that is contained in the EIS describes a range of potential vertical and horizontal impact areas, depending on the type of development that may occur.</p> <p>At the same time, it is agreed that it is essential to conduct a quantitative wind analysis of individual development proposals to ensure that wind impacts on</p>

Comment Number	Response
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the Lake Union Seaport Airport are mitigated. Therefore, an additional mitigation measure is recommended -- requiring a project-level analysis of wind impacts for all new development above the base height permitted under the Seattle Mixed zoning. It is anticipated that the approach to this analysis would include the following steps:

1. Construct a physical scale model of the proposed project and/or the maximum building envelope allowed at the site, with the surrounding physical context (i.e., existing buildings, topography, etc.);
2. Install the model into a boundary layer wind tunnel and measure velocities and turbulence levels along the prescribed flight path with and without the proposed project;
3. Test for prevailing wind directions and/or wind directions that are expected to have an impact on the flight path;
4. Present resulting data in a form to allow for quantitative comparison between existing and proposed conditions;
5. Provide a written report summarizing the methodology, results and interpretation of the results against any available published aviation standards for shear layers and turbulence levels. Analysis results would require interpretation by an aviation specialist who would assess the acceptability of these specific results for the aircraft actually used at this location.

In addition, the City may consider requiring additional analyses to address the following questions:

- Additional review to address potential future adjacent development (i.e., a future configuration which may augment or mitigate predicted impacts in the future); and/or
- Testing of mitigation schemes if the project results are unacceptable (i.e., the wind tunnel study could be then used to help define a height, size and location on that site that could be acceptable).

**Letter 2: Greve, Darren**

1	<b>Public Record.</b> All comments contained in this letter are included as part of the public record.
2	<b>Transfer of Development Rights (TDR).</b> The comments are noted.
3	<b>TDR in South Lake Union.</b> The comment is noted. Please see Final EIS Chapter 2 for inclusion of regional TDR as an incentive zoning measure.
4	<b>TDR and GHG Emissions.</b> The comments are noted.

Comment Number	Response
5	<b>TDR and Open Space.</b> The comments are noted.
<b>Letter 3: Freeman, Ketil and Belz, Sara</b>	
1	<b>Regional TDR.</b> The comments are noted.
2	<b>TDR and Incentive Zoning.</b> Please see Final EIS Chapter 2 for inclusion of regional TDR as an incentive zoning measure.
<b>Letter 4: Graves, David</b>	
1	<b>Shadow impact on public parks.</b> The comment refers to a summarized description of potential shade impacts. A detailed and specific account of the shadow impacts of each alternative on the neighborhood parks, including Cascade Playground and South Lake Union Park, can be found in the Aesthetic Shadows section (Draft EIS 3.10.9 – 3.10.12). This account has been substantially updated in the Final EIS (see Final EIS Section 3.4). The matrix in the Environmental summary has also been updated in the Final EIS in order to better differentiate between alternatives. (See also Appendix D for diagrams of each alternative’s shadow impacts in June, September, December and March.)
2	<b>Shadow Impacts.</b> The comments are noted. Please see Final EIS Section 3.4.9 for revised shadow images and mitigating strategies. Note that mitigation strategies call for a detailed shadow analysis as part of site-specific environmental review of development proposals. As identified by Seattle Municipal Code 25.05.675Q2e, there are a range of measures to address shadow impacts of specific development proposals. Key measures are also noted in the Draft EIS (pg. 3.10-87-88).
3	<b>Lake Union Park.</b> The comment is acknowledged. The referenced text in Draft EIS page 3.16-1 is revised as follows:  Lake Union Park is an approximately 9-acre park located at the north portion of the South Lake Union neighborhood, on the shore of Lake Union. <del>The park is currently undergoing a renovation that is scheduled to be completed in September 2010.</del>
4	<b>Cheshiahud Lake Union Loop.</b> The comment is noted and it is acknowledged that the Cheshiahud Lake Union Loop provides open space in South Lake Union. Note that the facility is also identified in Draft EIS Section 3.13.1 as a multi-use path.
5	<b>Denny Park Play Area.</b> The reference sentence on Draft EIS page 3.15-6 is revised as follows:  Potential improvements to Denny Park could include a plaza area, sport courts, <del>children’s play area</del> , an off-leash area, and a community center.

Comment Number	Response
6	<b>Maximize Solar Exposure to Parks.</b> The comment is noted. Please see Final EIS Section 3.4.9 for revised shadow images and mitigating strategies.
<b>Letter 5: Wilson, Barb</b>	
1	<b>Transit Community.</b> The comments are noted, including the inclusion <u>Seattle Transit Communities – Integrating Neighborhoods with Transit.</u>
2	<b>Support Increased Height and Density.</b> The comments are noted.
3	<b>Balance Growth with Livability Measures.</b> The comment is noted.
4	<b>Balance Residential and Commercial Growth.</b> The comment is noted. Please see the revised objectives in Final EIS, Chapter 2.
5	<b>Variety of Building Heights and Forms.</b> The comment is noted.
6	<p><b>Below-Grade Structures and Groundwater.</b> Some of concerns raised by this comment are already covered more broadly in the EIS. The first paragraph under “Impacts Common to All Alternative” (3.1-5 to 3.1-6) states that “The impacts would likely be greater for those alternatives with greater height limits (such as alternative 1), because deeper foundations would probably be required for construction.” In a subsequent paragraph on 3.1-6 (paragraph 3), potential changes to natural flow of groundwater are discussed. To improve this paragraph, and in response to the comment, the referenced paragraph is revised to read as follows.</p> <p>“Future development is also likely to impact surface water and groundwater flow in the area. Changes in grade and the addition of impervious surfaces would alter surface water flow. Excavation and foundation construction may require temporary or permanent dewatering to lower groundwater levels. Once constructed, foundations or underground structures may alter the natural flow of groundwater by acting as a barrier to groundwater movement. <u>These potential changes to local groundwater flow patterns could result in an increase or decrease in groundwater flow to properties adjacent to newly built structures.</u>”</p>
7	<p><b>Liquefaction.</b> To address this comment, the sentence noted below has been added to Draft EIS Section 3.1.2.</p> <p>“Steep slopes, landslides, and liquefaction could have the potential to impact future development under any of the alternatives. Steep slopes in the Fairview Avenue Corridor could be destabilized by construction activities. Destabilization could result in increased erosion or landsliding. Liquefaction-prone areas, such as the Valley/Mercer Blocks, might experience settlement and/or increased earth pressures on retaining structures during an earthquake.</p>

Comment Number	Response
	<p><u>Damage to infrastructure (such as roads and utilities) by liquefaction could cause a disruption to services and access for people residing in the area.</u> Impacts associated with development in areas with steep slopes, landslide potential, or liquefaction hazards can be minimized through appropriate design and construction measures."</p>
<p><b>8</b></p>	<p><b>Breathe Easy Homes.</b> The basis of the comment's reference to a higher incidence of asthma among adults being higher in the project study area is unclear (i.e., un-cited), and the stated difference (0.3%) seems insignificant. Nonetheless, air quality in most urban areas, as in most of the city of Seattle, is affected by more numerous and diverse sources than some rural areas of the county, and one ubiquitous air pollutant is particulate matter from motor vehicles and other combustion sources. "Breathe Easy Homes" seem to be aimed at removing both indoor and outdoor sources of a variety of air pollutants and allergens and may be more than is warranted for all residences in the project area. But enhanced air-filtering systems may be worth considering in most homes in the city in proximity to any major transportation routes.</p> <p><b>Wood Burning Pollution.</b> Such emission sources are subject to review and controls administered by the Puget Sound Clean Air Agency, which has long recognized and worked to reduce such pollution in the region.</p>
<p><b>9</b></p>	<p><b>Water Quality-</b>The current City Storm Water Manual (2009) requires treatment of any surface water that is discharged directly to the environment from a new pollution generating surface of over 5,000-SF. As most of the storm water in this basin is collected and routed to the combined sewer, local water quality treatment is typically not required. Treatment for this water is provided by the Metro treatment facility at West Point, prior to discharge to the environment.</p> <p>New buildings in the neighborhood that use green infrastructure methods (green roof or bio-retention planters) to detain and treat storm water will reduce pollutant loadings to the environment. As this will be a project by project decision, it is difficult to quantify improvements.</p> <p>Mercer Corridor improvements are providing some bio-retention features for the roadway improvements, but the runoff from most of this area will still be directed to the combined sewer and the regional treatment plant.</p> <p>Exemptions to the storm water code in 2005 have been rescinded with the adoption of the 2009 storm water code, for projects not vested before the adoption of the new code.</p> <p>The Combined Sewer area is approximately 265-acres of the 340-acre study</p>

Comment Number	Response
	<p>area. The remainder (75-acres) discharges through piped systems directly to Lake Union. See page 3.3-5 of the Draft EIS.</p>
<p><b>10</b></p>	<p><b>Potential Mitigation Measures.</b> Because there is no project-specific development associated with this EIS, no mitigation would be required. The mitigation measures listed by the commenter would more likely be required as sites are redeveloped. These potential mitigation measures have been added as potential mitigation measures for plants and animals.</p> <p>“City permitting of proposed redevelopment under all alternatives would require completion of the SEPA process, which includes an assessment of project impacts to fish and wildlife. <u>General mitigation measures could include open space for vegetation, migrating animals, and human enjoyment.</u> Other more specific mitigation requirements could include treatment of project-related stormwater, evaluation of outside lighting, installation of native plant species to reduce potential light impacts, and implementation of a “lights out” program to educate and encourage high-rise building tenants to turn off lights at night, particularly during the fall (southward) avian migration period. The City could also choose to reduce height limits on the three lots discussed above that could shade the juvenile outmigration corridor during spring mornings and evenings under Alternatives 1 and 2.”</p>
<p><b>11</b></p>	<p><b>Hazardous Materials Removal.</b> The higher excavation requirements for Alternative 1 and the associated potential benefits of removing more hazardous materials is addressed in the second to last paragraph in Section 3.5.2.</p>
<p><b>12</b></p>	<p><b>Noise Near Major Transportation Routes.</b> Levels of urban noise affecting residential uses are a recognized issue that is usually addressed in project-specific design. For example, site layout can be used to locate noise-sensitive outdoor use areas as far as possible from noise sources and to shield such areas using intervening buildings or structures. Interior living spaces are typically protected from loud outdoor environments using building materials and construction techniques to enhance outdoor-to-indoor noise transmission.</p> <p>The acoustic environment in the South Lake Union area is not unique in terms of its exposure to noise from many urban sources including major roadways and aircraft overflights. The livability of residential spaces in this area will require consideration of exterior noise levels as part of the ultimate building design of specific projects.</p>
<p><b>13</b></p>	<p><b>GHG Mitigation.</b> The commenter correctly notes that improved transit and pedestrian network can function as a GHG mitigation measure. These</p>

Comment Number	Response
	measures make walking and transit more competitive to car travel which has been shown to reduce GHG emissions.
14	<b>GHG Emissions.</b> Based on the results of the mode split analysis, the South Lake Union neighborhood, with the additional height and density, will have relatively low levels of GHG emissions, similar to other high-density neighborhoods such as Capitol Hill. Additional details regarding GHG emissions are expected as part of the upcoming updates to the City's Climate Action Plan and Comprehensive Plan.
15	<b>Building Heights and Flight Path.</b> The comment is noted. Also, please see the additional discussion in this Final EIS concerning the flight path (Section 3.2).
16	<b>Economic Analysis.</b> The comment is noted. A detailed economic analysis was outside the scope of this study. The EIS scope established that the visual analysis would identify impacts at build-out. A list of assumptions used in the visual modeling is contained in Draft EIS Section 3.10.2.
17	<b>Growth Trends.</b> The comment is noted. As described in Draft EIS Section 3.9, updated data specific to the South Lake Union neighborhood is not available. However, available housing data from census tracts that encompass the neighborhood is described in Draft EIS Section 3.9.
18	<b>2031 Growth Estimate.</b> The comment is noted. As described in Draft EIS Section 2.2, the 2031 estimates are intended to provide additional context for understanding potential long-term growth in South Lake Union. As noted in the discussion in this section, the estimate is for analysis purposes only and does not represent policy intent by the City. In order to disclose the potential range of capacity needed to meet a future growth target for South Lake Union, both 2024 and 2031 are considered in the analysis.
19	<b>Demographic Characteristics.</b> The comments are noted. Documentation of demographic characteristics was not available. The assumption of 350 sf per employee is based on typical employment density in downtown Seattle.
20	<b>Aesthetics Build-out Assumption.</b> The comment is noted. The EIS scope established that the visual analysis would identify impacts at build-out.
21	<b>Flight Path.</b> The comment is noted. As described in Draft EIS Section 3.10.2, the visual modeling assumed that future development on lots within the defined flight path would be limited by the flight path elevations, although no additional vertical buffer was assumed.  FAR Part 77 and associated flight path issues are primarily discussed in the Draft EIS Section 3.8, Land Use. Subsequent to issuance of the Draft EIS,

Comment Number	Response
	<p>additional review of the flight path was conducted (see Appendix F). This analysis included a review of how seaplane lanes are utilized (including runway utilization, flight tracks, and piloting techniques), an evaluation of the aircraft fleet used by floatplane operators, and documentation of the performance characteristics of the various floatplane aircraft. Several Federal Aviation Administration (FAA) and International Civil Aviation Organization (ICAO) planning documents that have applicability in the establishment of approach/departure protection boundaries for curving approach and departure procedures such as those used on Lake Union were also reviewed.</p> <p>Based on this analysis, and in coordination with WSDOT Aviation, a revised flight path was identified (see Section 3.2 of this Final EIS). This revised flight path differs from that shown in the Draft EIS in that portions are narrower than the previous flight path, the curvature is more gradual, and the east-west legs of the flight path have shifted slightly to the north. Specifically, the southern boundary has shifted 400-500 feet north so that the southern boundary lies north of Valley Street and is generally aligned with Broad Street. The southern boundary now crosses Aurora Avenue North at about Mercer Street. Similarly, the northern boundary of the flight path shifted 200-300 feet north, crossing the Lake Union shoreline at roughly Highland Drive and crossing Aurora Avenue just north of Ward Street. Please see Section 3.4 Aesthetics for revised images associated with the revised flight path.</p> <p>An additional mitigation measure has been recommended in this EIS – that a project-level analysis of wind impacts be required for all new development above the base height permitted under the Seattle Mixed zoning.</p>
22	<p><b>New Open Space.</b> The comment is noted. Additional mitigation measures are being proposed in the Final EIS to limit the total square footage of tower podiums greater than 45 feet in height and to encourage the development of more open space. See Final EIS Section 3.4.</p>
23	<p><b>Bulky Podiums.</b> See response to Comment 22 above</p>
24	<p><b>Abrupt Transitions.</b> The comment is noted. The Draft EIS reference to abrupt height transitions between neighborhoods is only intended to disclose this potential impact. Depending on individual perspective, this may be viewed as positive, neutral or negative.</p>
25	<p><b>Historic Resources.</b> The comment is noted.</p>
26	<p><b>Figure Sources.</b> Please see the following sources that are associated with specific figures.</p> <p>Figure 3.13-3 – Seattle Bicycling Guide Map, 2010.</p>

Comment Number	Response
	<p>Figure 3.13-4 – King County Metro, 2010.</p> <p>Figure 3.13-5 – Seattle Department of Transportation, 2010.</p> <p>Figure 3.13-6 – Puget Sound Regional Council Parking Inventory, 2006.</p> <p>Figure 3.13-7 – South Lake Union On-Street Parking Study, 2006.</p> <p>Figure 3.13-8 – Seattle Department of Transportation, 2007.</p> <p>Figure 3.13-9 – Seattle Department of Transportation, 2010.</p> <p>Figure 3.13-10 – Seattle Department of Transportation, 2010.</p> <p>Figure 3.13-13 – Washington State Department of Transportation, 2010.</p> <p>Seattle Department of Transportation, 2010.</p> <p>Figure 3.13-14 – Seattle Department of Transportation, 2010.</p> <p>Figure 3.13-15 – Denny Way Streetscape Concept Plan, 2009. Bicycle Master Plan, 2007. Pedestrian Master Plan, 2009. South Lake Union Urban Design Framework, 2010.</p> <p>Figure 3.13-23 – Seattle Department of Transportation, 2010. Denny Way Streetscape Concept Plan, 2009. Bicycle Master Plan, 2007. Pedestrian Master Plan, 2009. South Lake Union Urban Design Framework, 2010.</p>
27	<p><b>Similar Mode Splits among Alternatives.</b> The transportation analysis did use a multimodal model to evaluate potential transportation impacts. As shown in table 3.13-8, Alternative 1 resulted in a mode share of 48.3, 30.1, and 21.6 percent for autos, pedestrian/bicycle, and transit respectively. In contrast, ITE rates would predict that nearly all trips would be made by autos. The comment also questions why the mode split does not change much between alternatives. It is important to note that from a transportation perspective, all four alternatives were more similar than dissimilar. For the most part, the diversity of land uses and the design of the transportation system were assumed to be identical for each of the alternatives and the main difference between them was the density of development. While density is an important determinant in trip generation, the differences in density between the alternatives (when considering the entire SLU neighborhood) are minor. Therefore, with only minor changes in transportation input variables, only marginal differences in mode split result. If this were comparing a traditional suburban development with SLU the differences would be much more substantial.</p>
28	<p><b>Auto, Person, &amp; Internal Trips.</b> The mode split calculations shown throughout the document correctly account for person versus auto trips. In all cases, mode split was calculated using person trips. The note in the tables helps readers understand why they cannot use the mixed vehicle and person trips shown in the table to reproduce the mode splits in the tables. Appendix</p>

Comment Number	Response
	<p>E has additional clarification. The MXD model is not explicit about what an "internal" trip is. The reason is based on the methodology used to develop the MXD model. MXD was developed by comparing traditional ITE trip generation estimates to observed flows of vehicles, buses/trains, and pedestrians/bicycles across a boundary surrounding the MXD site. Sites ranged in size from a few acres to 1,000 acres. Because of this range in scale, it was impossible to determine the precise mode of travel for trips that did not leave the cordon. Therefore MXD classifies them as internal and the planner/engineer must use their best judgment as to how they are made. For an area like SLU, which is relatively compact and features paid parking, the analysis assumed that the majority of the trips internal to the neighborhood will be made by walking with a minority of trips via bicycle and transit. A meaningful number of internal trips by car is not anticipated.</p>
29	<p><b>Existing Pedestrian Infrastructure.</b> South Lake Union has a relatively complete pedestrian system, therefore, the analysis highlights deficiencies rather than creates a map showing that virtually every street has a sidewalk.</p>
30	<p><b>I-5 Traffic.</b> Although a survey indicating the origins and destinations of vehicles using I-5 near South Lake Union is not available, it is likely that the traffic is a mix of downtown-related traffic and regional through trips, as pointed out by the commenter.</p>
31	<p><b>2006 Parking Data.</b> We agree that the 2006 data is less relevant considering the changes in the area between now and then. As described in the report, there was a smaller sample of more recent parking utilization data (from November 2010), but the inventory was not as complete. The text includes a cautionary note about the relevance of the 2006 data (Page 3.13-17).</p>
32	<p><b>Parking Data.</b> By using the word "current," the document referred to the time the data were collected, which was during November 2010. Parking rates have already changed since the data were collected.</p>
33	<p><b>King County Metro.</b> The City of Seattle travel model includes a detailed transit network based on historical growth in service and future regional plans. Although King County Metro has indicated that the level of transit included in the PSRC model may be too ambitious due to current funding shortfalls, there is no alternate transit plan with the level of detail necessary to replace that in the City of Seattle model. Therefore, it is appropriate to use the regionally accepted travel demand model to complete the transit analysis.</p>
34	<p><b>Reasonably Foreseeable Pedestrian &amp; Bicycle Projects.</b> The only fully funded and programmed pedestrian and bicycle improvements are included in the Mercer East project. While it is possible that other projects will be</p>

Comment Number	Response
	<p>completed over time, using the traditional strict definition applied to EIS documents, no other improvements are reasonably foreseeable.</p>
<p><b>35</b></p>	<p><b>MXD Applicability to SLU.</b> While the MXD model was developed over a range of development scales -- from less than five acres to over 1,000 -- it is true that the magnitude of development (total floor area) in SLU is larger than what MXD was developed. To give a fair and accurate measure, SLU was broken into five separate MXD districts to ensure that the model would not "over-internalize" simply because of the large development scale. This type of approach is commonly used when applying smart-growth trip generation adjustments and is consistent with how all travel demand forecasting models are developed and applied. The MXD model has been validated across the country and was deemed appropriate by various academic peer review panels as part of the academic journal submission process.</p>
<p><b>36</b></p>	<p><b>Development Assumptions.</b> There are two issues to keep in mind when looking at the chart on Page 3.13-52: land use capacity and the 2031 future growth estimate. The land use capacity is the total amount of households and jobs that could be accommodated by the full buildout of each alternative. The 2031 growth estimate is intended to provide a general estimate of the potential long-term growth in South Lake Union. As noted in the discussion in this section, the estimate is for analysis purposes only and does not represent policy intent by the City.</p> <p>The growth estimate of 11,900 households and 21,900 jobs (which were provided based on regional PSRC growth) are identical for all alternatives. The calculations for both capacity and land use take into account existing uses that would remain unchanged, those that will be lost when parcels are redeveloped, as well as new development. Not all of the alternatives would provide enough capacity to reach the 2031 growth estimate (the No Action Alternative and employment under Alternative 3), while others would accommodate all growth before reaching full buildout (Alternatives 1 and 2 for both housing and jobs, and Alternative 3 for housing). Therefore, the predicted land use totals are determined by either the capacity or the growth estimate, depending on which is the more limiting factor under each circumstance.</p>
<p><b>37</b></p>	<p><b>Trip Generation in High Density Areas.</b> The literature on travel behavior and urban form shows that density is only one factor that influences how people travel. In fact, when taken in isolation, density is shown to reduce the demand for vehicle trips with an elasticity of approximately -4.6 percent (e.g., a doubling of density leads to a reduction in vehicle trip generation of about 4.6 percent). Density is often associated with more substantial reductions in</p>

Comment Number	Response
	<p>vehicle trip generation because higher densities are often concurrent with better mixes of land use type, more transit, better pedestrian amenities, higher parking costs, and other factors. Given that the EIS analysis held constant everything but density between the land use alternatives, the marginal impact on vehicle trip generation is consistent with expectations. The mitigation measures show the power of varying factors like the quality of the pedestrian environment and parking policies in a dense environment.</p>
<p><b>38</b></p>	<p><b>Parking Impacts among Alternatives.</b> We expect the short term parking impacts for each of the action alternatives to be very similar. As new projects develop, these early projects will be helping to develop the infrastructure that will help provide more viable alternatives to driving. However, since these first projects will be entering into an incomplete environment, they will require more parking, which could lead to short-term impacts and parking scarcity in the neighborhoods. These impacts would be similar for all three action alternatives.</p>
<p><b>39</b></p>	<p><b>Pedestrian &amp; Bicycle Improvements.</b> These improvements would further enhance the quality of the bicycle and pedestrian system and would be consistent with the mitigation measures in the DEIS. However, given the programmatic nature of this document, specific details about mitigation cannot be defined at this time. Details will be included as part of specific project reviews.</p>
<p><b>40</b></p>	<p><b>Geology.</b> As described in Draft EIS Section 3.1 (Geology and Soils), potential impacts associated with liquefaction hazards could be minimized through appropriate design and construction measures. Emergency service response (police or fire service) associated with potential liquefaction damage would be provided in accordance with City of Seattle Fire Department and Police Department standards.</p>
<p><b>41</b></p>	<p><b>Public Services – Fire.</b> At the time of publication of the Draft EIS, Fire Station 8 and Fire Station 25 were scheduled for renovation in 2010 and were anticipated to be completed in 2012. The City of Seattle Fire Department website currently indicates that the renovations to Fire Station 8 and Fire Station 25 are anticipated to be completed in 2013 and 2014, respectively.</p>
<p><b>42</b></p>	<p><b>Sanitary Sewer.</b> The Mercer Corridor improvements are making upgrades and changes to the public water, sewer and storm systems as part of that work. These changes are primarily under the new streets to reduce the likelihood that new paving would need to be disrupted later. The biggest change is a new combined sewer in 9th Avenue between Westlake and Mercer. Other changes are to the storm water system to support use of rain gardens and</p>

Comment Number	Response
	other bio-infiltration storm water methods in areas near the lake, north of Mercer Street.
43	<b>Sanitary Sewer.</b> Please see response to Comment 42 in this letter, above.
44	In response to the success of the development policies in the NODO area Seattle City Light is submitting in the 2013-2018 CIP a recommended option to build both a NODO Substation and Network to serve the North Downtown area Urban Centers. In addition SCL will look to strategically implement infrastructure improvements in coordination with other City capital improvement projects, such as our efforts on the Mercer Corridor Project (East & West).
45	<b>Open Space.</b> The Draft EIS alternatives do not specifically propose an amount of additional open space that could be provided in the South Lake Union Neighborhood, nor do they propose specific locations for such open space. The City could make a policy decision regarding the requirement for specific amounts or locations of open space in the South Lake Union Neighborhood, including a provision to meet the requirements of LEED ND.
46	<b>Existing Open Spaces.</b> The 15.7 acres of usable open space in the South Lake Union Neighborhood includes South Lake Union Park, Cascade Playground and Denny Park. As noted in the comment, Denny Playfield is a privately-owned, temporary recreation facility and was not included in this calculation.
47	<b>Accessibility of Existing Park and Recreation Facilities.</b> The comment is noted. There are existing physical obstacles between the South Lake Union Neighborhood and park/recreation facilities to the east that could discourage people from walking to these facilities. However, some of the park/recreation facilities contain unique features that could attract people to drive to them (i.e., tennis courts, wading pools, bike trails, Volunteer Park Conservatory). It should also be noted that these areas to the east were not included as part of the calculation of usable open space in South Lake Union Neighborhood.
48	<b>Mitigation Strategies.</b> The Draft EIS does not specify the amount of open space that could be required as part of development bonus process. This measure is identified as a potential mitigation measure. The City of Seattle would determine specific parameters regarding this potential development bonus.
49	<b>Park and Recreation Facilities.</b> As noted in the response to Comment #45, the Draft EIS does not propose a specific amount of open space that could be

Comment Number	Response
	<p>provided under the alternatives or the specific location that potential open space should be located. The City of Seattle would determine whether a policy decision is needed concerning the specific amount of requirement open space and/or the location of such open space in the South Lake Union Neighborhood.</p>
<p><b>50</b></p>	<p><b>Use of Tax Revenues.</b> The comment is noted.</p>
<p><b>51</b></p>	<p><b>Public Access and Open Space.</b> The comment is noted.</p>

## Comment Letters 6-19

### Community Organizations and Interest Groups

- |            |  |
|------------|--|
| <b>6.</b>  | Smith, Leslie G.                               |
| <b>7.</b>  | Swenson, Skip                                  |
| <b>8.</b>  | O'Tool, Lori                                   |
| <b>9.</b>  | Danyluk, Edward                                |
| <b>10.</b> | Joncas, Kate                                   |
| <b>11.</b> | Woo, Eugenia                                   |
| <b>12.</b> | Aramburu, J. Richard                           |
| <b>13.</b> | Gemmel, Chris                                  |
| <b>14.</b> | Goodspeed, Jim; Gemmel, Chris; and Groth, Lori |
| <b>15.</b> | Ramey, Brian                                   |
| <b>16.</b> | Staton, Renee A.                               |
| <b>17.</b> | Lee, Sharon                                    |
| <b>18.</b> | Dinndorf, Jerry                                |
| <b>19.</b> | Johnson, Rob                                   |

# The Alliance for Pioneer Square

*New Energy for Seattle's Historic Neighborhood*

Seattle Department of Planning and Development  
Attn: James Holmes  
700 Fifth Ave., Suite 1900  
P.O. Box 34019  
Seattle, WA 98124-4019

RE: South Lake Union Height and Density Draft Environmental Impact Statement (DEIS)

Dear Mr. Holmes;

I am writing to comment on the Draft EIS for South Lake Union. Healthy and vibrant neighborhoods have a balance of jobs and housing. Seattleites should have a reasonable option to live and work close to downtown and not always have to rely on a car. I was struck when I heard recently that the new wealth is being able to walk to work. South Lake Union is perfectly poised to offer this, so long as it is allowed to grow appropriately. Height and density will allow more people to locate in this urban center and live a healthier and more environmentally friendly lifestyle. Zoning changes in South Lake Union to provide more housing and job opportunities for this Urban Center will generate multiple benefits for South Lake Union, Seattle and the region.

More jobs and residents in the South Lake Union Urban Center will:

- Increase Seattle's economic base
- Reduce trips by private automobile
- Attract more customers to retail and small business establishments throughout downtown
- Bring more eyes on the street; no long expanses of dark parking lots or along abandoned warehouses

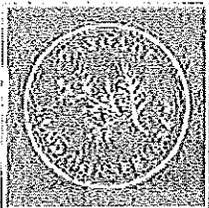
Pioneer Square will benefit from a healthy and vibrant downtown and center city neighborhoods by providing more customers for our unique restaurants, galleries and small businesses. In addition, we eagerly await connecting the First Hill and South Lake Union streetcar lines to enhance mobility and circulation between and among South Lake Union, Pioneer Square and other center city neighborhoods.

You are strongly encouraged to analyze the benefits for South Lake Union and the entire downtown area of Alternative 1 versus the status quo. Thank you for your time and consideration.

Sincerely,

*Leslie G. Smith*

Leslie G. Smith  
Executive Director



## CASCADE LAND CONSERVANCY

CONSERVING GREAT LANDS  
CREATING GREAT COMMUNITIES

April 11, 2011

Mr. Jim Holmes  
City of Seattle Department of Planning & Development  
700 5th Ave, # 5752  
Seattle, WA 98104-5070

Mr. Holmes:

The following comments pertain to the Draft Environmental Impact Statement (DEIS) for South Lake Union. As outlined in *The Cascade Agenda*, Cascade Land Conservancy strongly believes that growth should be focused in our cities and designed in a way that makes neighborhoods walkable, efficient and affordable. By making smart choices about future growth, we can create thriving neighborhoods and a vibrant city, as well as save the region's natural and working lands from poorly planned development and maintain the quality of life Seattleites and all Washingtonians enjoy.

Cascade Land Conservancy applauds the City of Seattle and the Department of Planning & Development for efforts to work with the community and stakeholders to investigate potential options for the redevelopment of South Lake Union. We feel that Alternatives 1 and 2 in particular are exciting opportunities for Seattle; these represent a unique and important opportunity to plan with serious consideration for how the City wants to grow—both in the near-term and beyond the 2031 planning horizon. | 1

Several items in the DEIS merit further comment. These include:

- Community amenities
- Walkability and multi-modal transportation
- Affordable housing
- Regional transfer of development rights

Any increases in residential and commercial capacity of South Lake Union must incorporate community amenities for residents, employers and employees, and those frequenting South Lake Union. Alternative 1 is particularly attractive in this regard, as it is most likely to generate the development and rents necessary to justify both public and private investment in community amenities. Amenities such as passive and active open space, green alleys, plazas, and streetscapes encouraging community use and interaction, amongst other considerations such as a library, a community center and arts programming, will contribute not only to the quality of life in the neighborhood, but will also drive demand for development and associated economic development. | 2

Significant improvements in both transit and bike/pedestrian infrastructure will be necessary to accommodate the increased development under Alternatives 1 and 2. This effort should include working with King County Metro to increase service and improve transit accessibility in the South Lake Union Neighborhood. Streetscape improvements to Denny and Aurora will also be necessary to facilitate safe, easy crossings of these streets for pedestrians and bicycles. With limited capacity for road | 3

expansion in South Lake Union, improved bicycle, pedestrian and transit access will be necessary to create a thriving neighborhood.

3 cont

Cascade Land Conservancy strongly supports the City's stated objective of increasing affordable housing in South Lake Union. We support, generally, proposals to mitigate for any loss of existing affordable housing stock, as well as opportunities to incentivize new affordable housing. The DEIS suggests incentives in current City code could be extended to South Lake Union; however, it does not detail how such incentives would be structured with regard to other considered incentives, such as those for onsite improvements. We recommend any incentive program or programs advancing the important goal of increased affordable housing be structured to achieve objectives but avoid competition with incentives for other community goals. Creating a framework that avoids pick-lists or overlapping incentives is key to a successful implementation.

4

Cascade Land Conservancy was disappointed to discover that, while opportunities for transfer of development rights for affordable housing, historic landmarks and overwater building removal were explored, the DEIS gives no consideration for regional transfer of development rights in South Lake Union. Transfer of regional development rights would encourage the transfer of development potential from farms, forests, and other lands of regional importance into South Lake Union. Such transfers support numerous City of Seattle objectives, including:

5

- Reduced carbon emissions by encouraging growth in cities and reducing vehicle miles traveled, per the 2010 City Council priority for carbon neutrality
- Implementing regional growth management strategies, per the Comprehensive Plan
- Strengthening the security and sustainability of Seattle's food system, per Resolution 31019

Including a regional transfer of development rights incentive program in South Lake Union is encouraged by Resolution 31147 and the South Lake Union Urban Design Framework, and is supported by state law (RCW 36.70A, RCW 43.362) and regional planning relevant to Seattle (Puget Sound Partnership Action Agenda, Puget Sound Regional Council VISION 2040). For these reasons, Cascade Land Conservancy urges the Department of Planning & Development to include regional transfer of development rights in any incentive zoning planning or recommendations.

South Lake Union represents a momentous opportunity for Seattle to proactively plan for growth, increase the quality of life for all Seattle residents, create new economic opportunities, and further Seattle's leadership as a world-class city. Cascade Land Conservancy is encouraged by the Alternatives proposed in the DEIS for South Lake Union, and we hope you will consider our comments in the final environmental impact statement.

Thank you for your consideration.

Sincerely,



Skip Swenson  
Managing Director of Policy  
Cascade Land Conservancy



South Lake Union, Seattle:  
1010 Valley Street, Seattle, WA 98109  
Tel: 206-382-2628 Email: [cwb@cwb.org](mailto:cwb@cwb.org)

Cama Beach State Park:  
1880 SW Camano Drive, Camano Island, WA 98282  
Tel: 360-387-9361 Email: [cama@cwb.org](mailto:cama@cwb.org)

28 March, 2011

To whom it may concern,

The Center for wooden boats is a not-for-profit 501(c)(3) organization whose mission is to provide a gathering place where maritime history comes alive through direct experience and our small craft heritage is enjoyed, preserved, and passed along to future generations. As a resident of South Lake Union for over 30 years, The Center for Wooden Boats has seen many changes in the neighborhood, and we are encouraged and excited by what is on the horizon.

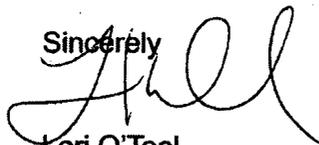
The Board of trustees of The Center for Wooden Boats is pleased to express its support for the Proposed South Lake Union Urban Design Framework and for the proposed Height and Density Alternatives #1 and 2 included in the Draft Environmental Impact Statement.

Visitors to The Center for Wooden Boats come from around the city and around the world; but it is engagement in our local neighborhood community that makes The Center for Wooden Boats the place that it is and that helps to keep us afloat year after year. A strong and vital community: healthy businesses, a diverse residential population, and active, welcoming pedestrian environments are all essential to the health of any organization that endeavors to preserve our cultural heritage.

We are excited by the dense, vital, pedestrian oriented and mixed use vision for the future growth of the South Lake Union neighborhood that is presented in the Framework. We appreciate the emphasis on visual and physical access to Lake Union through open space strategies, view corridors, and pedestrian links. We appreciate the view corridors along Terry and Boren, the pedestrian oriented retail use on Valley St, and the proposed festival street designations for Valley St and Terry St, as well as the focus on green stormwater infrastructure to help improve water quality and the aquatic habitat in Lake Union.

The Board of trustees of the Center for Wooden Boats is grateful to the individuals and organizations who have given their time to articulate this exciting vision for South Lake Union's future. We enthusiastically support the outcome of the process and look forward to the realization of the vision for the neighborhood.

Sincerely



Lori O'Tool

President, The Center for Wooden Boats Board of Trustees

*CWB Mission: to provide a gathering place where maritime history comes alive through direct experience and our small craft heritage is enjoyed, preserved, and passed along to future generations.*

1

**DENNY TRIANGLE NEIGHBORHOOD ASSOCIATION**

April 11, 2011

James Holmes, Senior Urban Planner  
City of Seattle Department of Planning and Development  
700 Fifth Avenue, Suite 1900  
P.O. Box 34019  
Seattle, WA 98124-4019

RE: South Lake Union Draft Environmental Impact Statement

Dear Mr. James Holmes:

The purpose of this letter is to provide the Denny Triangle Neighborhood Association's comments on the South Lake Union Height & Density Alternatives Draft EIS.

The Denny Triangle Neighborhood Association supports greater height and density in South Lake Union and supports the South Lake Union Neighborhood plan's goals and objectives to provide a dense, diverse, sustainable, energetic and aesthetically pleasing Center City neighborhood. | 1

Given the potential for growth and scope of land use changes proposed for South Lake Union, there are concerns related to the traffic impacts to our neighborhood as well as adjacent neighborhoods and the greater downtown area. | 2

We ask for more analysis on the traffic impacts. There is significant congestion in and out of our neighborhood and downtown now and all the alternatives appear to exceed the capacity of the streets and arterials. Additionally, it is very important that there be careful evaluation of how to improve vehicular access to the regional highway system and major arterials that are located in South Lake Union and in adjacent neighborhoods as well as planning improvements for transit, bicycle and pedestrians. |

We also ask that further evaluation be done regarding mitigation. There appears to be very limited resources available into the foreseeable future, especially from Metro Transit, to achieve adequate mitigation for transportation impacts related to density.

3

Sincerely,

*Ed*

Edward Danyluk, Chair  
Denny Triangle Neighborhood Association  
C/O Impark  
1700 7<sup>th</sup> Avenue, Suite 106  
Seattle, WA 98101

Cc: Seattle City Council President Richard Conlin  
Councilmember Sally Bagshaw  
Councilmember Bruce Harrell  
Councilmember Nick Licata  
Councilmember Tom Rasmussen  
Councilmember Sally Clark  
Councilmember Mike O'Brien  
Councilmember Jean Godden

Ms. Diane Sugimura, Director  
City of Seattle Department of Planning and Development



**Our Mission**  
To champion a healthy, vibrant urban core

Downtown Seattle Association

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April 11, 2011

Diane Sugimura  
Director, Planning and Development  
700 Fifth Ave., Suite 2000  
P.O. Box 34019  
Seattle, WA 98124-4019

RE: Draft South Lake Union EIS

Dear Director Sugimura,

On behalf of the Downtown Seattle Association (DSA), I write to submit comments to the South Lake Union Draft Environmental Impact Statement. The Downtown community is excited by the recent growth in South Lake Union. The increases in retail, employment and residential units in the neighborhood are important to Downtown and have a positive ripple effect on other Downtown neighborhoods.

We believe that additional employment and residential density in South Lake Union is critical to Downtown's future economic vitality. As you are aware, the city has targeted South Lake Union for significant employment and residential growth through the Comprehensive Plan – calling for a minimum of 16,000 new jobs and 8,000 new households by 2024. We strongly support these targets and urge the city to take aggressive and deliberate actions to achieve them. The Final EIS should be broad enough and consider a wide range of alternatives so that policy makers have sufficient information, options and flexibility to achieve the minimum growth targets.

We urge the following issues to be incorporated in the Final EIS:

1. Analyze maximum floor plates of at least 35,000 square feet in certain sections of SLU. Currently the EIS limits tower floor plate size to 24,000 square feet. Certain technology and biotech employers require large floor plates to meet their programmatic needs. Large floor plates are more mechanically efficient for these users, and often foster better collaboration and innovation among employees.

By not studying an adequate range of zoning options that allows the city to plan for and attract key growth sectors to South Lake Union, we force Seattleites to seek work elsewhere in the region.

In 2009, Seattle had 30,000 fewer jobs than in the year 2000. During the same period, suburban King County added 15,000 jobs. SLU is well positioned to attract biotechnology and technology companies that have previously chosen suburban locations if the zoning is conducive to development of properties that meet their needs. If we fail to concentrate additional employment within the Downtown core, we encourage sprawl and additional gridlock, which is inconsistent with adopted local and regional policy.



The Final EIS should study floor plate sizes of at least 35,000 square feet to preserve options for policy makers to develop zoning that meets the needs of these tenants. We recognize that 35,000 square foot floor plates may not be appropriate in all areas of SLU, and recommend that this analysis be focused on the east and west sides of the Fairview Avenue corridor. This corridor is comprised of many superblocks (greater than 100,000 square feet) where two 35,000 square foot towers would still leave nearly an acre of public open space at street level. Limiting the floor plate size of the towers to 24,000 square feet has the potential to result in larger podiums and less open space at street level.

2 cont

2. Reduce the required minimum lot size for residential developments to 20,000 square feet. The Draft EIS considers a minimum lot size of 22,000 square feet, which will limit residential densities in SLU. A typical ¼ block lot is 120' X 180', which equates to 21,600 square feet. The Final EIS should consider minimum lot sizes of 20,000 square feet.

3

Finally, we urge the City to evolve its environmental review process for land use decisions and analyze and document the benefits from increased employment and residential densities. This could include, but should not be limited to, examining the amount of city tax revenue that would result from each zoning alternative. Dense, mixed-use development generates over ten times the amount of tax revenue per acre compared to the typical surface parking lot. These economic benefits should be considered as part of the analysis of zoning alternatives.

4

Thank you for consideration of our comments. We urge you to include a broader range of options for the Final EIS to put the neighborhood, property owners and developers in the best position possible to achieve South Lake Union's employment and residential growth goals.

5

Sincerely,



President  
Downtown Seattle Association

cc: Mayor Mike McGinn  
Seattle City Councilmembers  
Marshall Foster, Department of Planning and Development  
Jim Holmes, Department of Planning and Development



Preservation Development Authority Council

11 April 2011

Via Email

- Mary McCumber, Chair; Karen Breckenridge; Sharon Coleman; Andrea Divoky; Fauna Doyle; James Fearn; Michael Herschensohn; Pete Mills; Rico Quirindongo; Rick Sever; Marcia Wagoner

Seattle Department of Planning and Development
ATTN: James Holmes
700 5th Avenue, Suite 1900
PO Box 34019
Seattle, WA 98124

Re: Comments on the DEIS for the South Lake Union Height and Density Alternatives

Kathleen Brooker, Executive Director

Foundation Board of Directors

- Michael Herschensohn, President; James Fearn; Gary Gaffner; Mary McCumber

Dear Mr. Holmes:

This letter provides comments on the 2011 Draft Environmental Impact Statement (DEIS) for the South Lake Union Height and Density Alternatives. I am writing on behalf of Historic Seattle, which is Seattle and King County's only nonprofit membership organization dedicated to preserving our architectural legacy.

We appreciate the objectives of the South Lake Union Height and Density Alternatives proposal and believe continued planning for the area's growth and use is necessary. We've seen positive changes in the form of new development and mix of uses in the area and appreciate the added vibrancy to some sections of South Lake Union.

However, none of the objectives in Chapter 1 of the DEIS mentions historic character. Only one objective refers to "neighborhood character" but that is in the context of providing more "character" through new construction, not maintaining or valuing historic or potentially historic buildings. Since the South Lake Union Neighborhood Plan of 1998 and the updated South Lake Union Urban Center Plan of 2007 both specifically include entire sections on "Neighborhood Character" and discuss the importance of maintaining historic character, we believe an objective of this proposal should include language that recognizes the significance of historic character to be consistent with the neighborhood plans. This is a core value that should not be ignored.

1

The DEIS states clearly what the anticipated impacts are to historic resources. Alternative 1 "allows for the greatest amount of development, which could result in the greatest amount of development pressure on existing small scale structures that may be eligible for historic designation." Additionally, in reference to Alternative 1, "Differences in character, height, and bulk of new development adjacent to a designated historic structure or a structure potentially eligible for historic

2

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www.HistoricSeattle.org info@HistoricSeattle.org

designation, could negatively impact the historic value of the existing structure.” Alternatives 2 and 3 would have similar impacts to historic resources.

2 cont

The proposed mitigation measures do not offer much more than what has already been proposed in the 1998 and 2007 neighborhood plans. What guarantees are there that these proposed mitigation measures will actually be carried out and in a time frame that will actually be useful for protecting historic resources? One mitigation strategy discussed in both the DEIS and the 2007 updated neighborhood plan is analyzing the feasibility to expand the transfer of development rights (TDR) program to locally designated landmarks in South Lake Union. Historic Seattle supports financial incentives to preserve historic properties and believe expanding the TDR program to South Lake Union’s designated landmarks would be a positive tool for both preservation and economic development.

While we understand and support the need for increased height and density in the South Lake Union Area and believe the area is not cohesive enough to be a historic district, it is also important to remember that historic character doesn’t mean only maintaining and preserving individual buildings that meet local or national register criteria. Historic character, as a component of neighborhood character, is much broader than that. It’s about how a streetscape, block or neighborhood feels. The most pedestrian-friendly neighborhoods are the ones that evoke a sense of place and history.

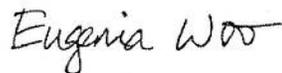
3

The light industrial heritage of South Lake Union is particularly important and evokes this sense of place. The “Historic Resources” section of the DEIS overlooked a significant property (802 Roy Street) that the City of Seattle Historic Preservation Program has deemed eligible as a Seattle Landmark and individual listing on the National Register of Historic Places. The building, owned by City Light, was included in the 2001 survey of City-owned properties which was not cited in the DEIS. This building has great adaptive reuse potential for community uses that can benefit the neighborhood.

4

Thank you for the opportunity to comment.

Sincerely,



Eugenia Woo  
Director of Preservation Services

# ARAMBURU & EUSTIS, LLP

Attorneys at Law

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April 11, 2011

James Holmes  
Senior Urban Planner  
City of Seattle Department of Planning and Development  
700 Fifth Avenue, Suite 2000  
Seattle, WA 98124

Jim.Holmes@seattle.gov

Re: DEIS for South Lake Union Height and Density Alternatives.

Dear Mr. Holmes:

This office represents Lake Union Opportunity Alliance (LUOA), a local coalition of residents, business owners and interested persons concerned with the future of the South Lake Union community.

1

My client has asked me to review and provide comments on the DEIS for South Lake Union Height and Density Alternatives (hereinafter "the DEIS"). After review, it is apparent that the DEIS is inadequate from multiple standpoints, which are described herein. Because these deficiencies are so serious, we ask that the DEIS be rewritten and recirculated before a final environmental impact statement ("the FEIS") is prepared. Our comments follow.

### I. FAILURE TO PROVIDE A STATEMENT OF NEED.

The DEIS states that the Seattle Comprehensive Plan establishes that the South Lake Union neighborhood should support a concentration of housing and employment. Page 2-1. The South Lake Union neighborhood already contains a concentration of housing and employment and there is no documentation as to why the current zoning, with accompanying densities and heights, is insufficient to meet needs of the local community and the Comprehensive Plan.

2

Further, as the "Planning Context" discussion at Section 2.2 of the DEIS indicates, growth targets have been recently established for the planning horizon out to

3

2031 by King County and its cities. However, this discussion also makes clear that these overall growth targets have not been incorporated into the City of Seattle Comprehensive Plan, nor have the growth targets been allocated to the various neighborhoods within the City. That process will take place in 2014.

3 cont

The DEIS states that it gives the City "an early opportunity" to consider how these alternatives fit into the future comprehensive plan update. Page 2-7. As the footnote at page 2-8 indicates the city "has not yet identified specific 2031 targets for neighborhoods within the City" because that would not be done until 2014. The DEIS does not explain why planning for the South Lake Union neighborhood should be accelerated before the planning for the rest of the City's neighborhoods. The assumption that the same percentage of distribution of residences and employment will be applied to the allocation process in 2014 is not an assumption that can be made absent a City Council directive and decision. One of the key tenets of the Growth Management Act is to have coordinated planning, and to take account of all alternatives for the distribution of growth. The acceleration of analysis and adoption of development regulations for the South Lake Union Neighborhood is accordingly not consistent with GMA policies and the City should cease further analysis of the subject. The South Lake Union Neighborhood should be considered for additional growth based on 2031 populations and employment goals only at the time the rest of the city is also analyzed.

Under SEPA it is far more appropriate to examine the distribution of growth throughout the entire city, not a single location like South Lake Union. If the City is determined to pursue a process inconsistent with the GMA, the DEIS should be rewritten and redistributed for comment to examine growth issues on a citywide basis.

Based upon the foregoing, an additional alternative should be included within the DEIS. The DEIS should include an analysis of the deferral of planning for South Lake Union height and density alternatives until planning can proceed for the entire city in 2014. Alternative analysis must include distributing a portion of the new housing and employment into other urban villages and other city neighborhoods, especially for 2031,

4

Analysis is also required on current economic conditions and the corresponding effect on the need for additional housing and employment. It is widely known that housing markets continue in distress and the demand for additional housing has dropped substantially. The same is true for commercial real estate. The foregoing analysis should consider current commercial and office space vacancy rates in downtown Seattle and other neighborhoods. Analysis is also required for the number of permitted or proposed, but unbuilt, office, commercial and residential projects within the City that have been delayed or deferred due to the present recession. The revised DEIS, or FEIS, should provide analysis as to whether those deferred or delayed projects are able to absorb demands for new office, commercial and residential capacity without

5

the need for an increase in South Lake Union density and height.

5 cont

In light of the foregoing issues, analysis should be made as to whether the South Lake Union Neighborhood, with new heights and densities, will in fact mean that growth in other urban villages will be stifled by growth concentration in South Lake Union.

6

The foregoing leads to additional questions that must be answered in the final EIS:

\*Explain whether the City is meeting its 20 year projections (2024) for housing and employment goals.

\*What factors or adopted policies indicate the need for more housing and employment in this area?

\*Is the City failing to meet its housing and employment goals and if so, are all areas of the City assuming equal portion?

\*List the other Urban Center Neighborhoods in the city and what percentage these neighborhoods would assume as a part of either 2024 or 2031 goals.

## II. AESTHETICS.

Most viewscape scenarios provide the "bird's eye" view and views from Gas Works Park. However, essentially bird's eye views are not seen by anyone but birds. The views from Gas Works are also seen by only a few persons. The DEIS is completely negligent for not providing perspective from areas south of the South Lake Union neighborhood. For example, there are no perspectives for view losses from downtown or Belltown, and only a few from the west side of Capitol Hill. Thousands of residents and office occupants have views from these areas over the South Lake Union Neighborhood to Lake Union itself. All of these views would be affected by density and height modifications for South Lake Union. These views need to be analyzed and carefully considered.

7

8

The analysis also does not include proposed projects to be built in the downtown south of Denny Way and the ability of these projects to absorb growth. An analysis needs to be made of the impacts on viewscales from these projects.

The City's analysis seems to assume that the terms of SEPA policies under SMC 25.05.675.P limit the viewpoints that should be considered. However, as this is an area-wide zoning modification, and not an action on a specific private project, these

limitations do not apply. This is a serious legal error that will require the DPD to redraft the DEIS and recirculate it.

8 cont

Further, the analysis completely fails to take account of the terms of the Shorelines Management Act (SMA), RCW ch. 90.58; in particular RCW 90.58.320, which establishes height limits respecting permits:

9

No permit shall be issued pursuant to this chapter for any new or expanded building or structure of more than thirty-five feet above average grade level on shorelines of the state that will obstruct the view of a substantial number of residences on areas adjoining such shorelines except where a master program does not prohibit the same and then only when overriding considerations of the public interest will be served.

It is obvious that the higher buildings that are found in some of the alternatives will block vies of many residents. It is important to note here that the location of the residences from which views may be blocked is not limited to properties within the shoreline area. The SMA also requires that these policies be applied to lands adjacent to the shoreline zone to be consistent with SMA policies:

All state agencies, counties, and public and municipal corporations shall review administrative and management policies, regulations, plans, and ordinances relative to lands under their respective jurisdictions adjacent to the shorelines of the state so as to achieve a use policy on said land consistent with the policy of this chapter, the guidelines, and the master programs for the shorelines of the state. The department may develop recommendations for land use control for such lands. Local governments shall, in developing use regulations for such areas, take into consideration any recommendations developed by the department as well as any other state agencies or units of local government.

RCW 90.58.340 (emphasis supplied). As noted above, the SMA establishes a strong policy for protection of visual access to the water/shoreline areas and for protection of views, especially from residential areas. Views of Lake Union are of great value in Seattle and the DEIS fails to give complete analysis of these impacts. Much of the development proposed by the current plan is achieved by permitting greater height either within or adjacent to the two hundred foot shoreline zone.

Analysis should be made of any residential or commercial properties that will have their view of Lake Union impaired or impacted by these zoning alternatives. For example, views are likely to be impacted as far south as Lenora or even areas further south in the downtown core. The areas affected should be shown on a map or maps, together with

10

the degree of impacted views. This will require a significant expansion of the view points and simulations stated on page 3.10-40 of the DEIS.

10 cont

In summary, the visual and aesthetic analysis is so deficient as to require a redrafting of the DEIS, and recirculation for comments, prior to proceeding to the preparation of the FEIS.

11

### III. TRANSPORTATION ISSUES.

The transportation section is deficient in several respects.

12

First, there is only minimal discussion of the impacts of the construction of the Bored Tunnel on the South Lake Union neighborhood. Recent analysis has indicated that because of likely tolls for vehicular use of the Bored Tunnel, and the lack of intermediate downtown access, a significant portion of the current traffic on the SR 99 Viaduct will use downtown Seattle streets. This data is also included in the Supplemental DEIS for the Bored Tunnel project. "The issues, left unaddressed, will impact accessibility to and the character of the Center City, particularly in the vicinity of Pioneer Square and the Seattle Center/South Lake Union areas," says a briefing paper presented to the City Council on January 25, 2011 by Nelson/Nygaard (emphasis supplied). These impacts may significantly impact background traffic on streets and intersections in the South Lake Union area. The findings of this study need to be reviewed and incorporated into the transportation analysis for the DEIS.

Second, the DEIS appears to assume that peak trip generation will be heavily affected by non-auto alternatives, mostly including bike/pedestrian/internal trips. See DEIS at page 3.13-2. The justification for these conclusions needs to be disclosed and analyzed. Page 3.13-48 states that the project team "use an innovative trip generation analysis technique" known as the MDX model. Because the MDX model is new, with little backup support, the DEIS should provide a more traditional form of traffic analysis by trip generation rates as used in ITE Manuals. There are indications in the DEIS that socioeconomic conditions suggest traditional trip generation analysis is questionable, but those conditions need to be identified in detail.

13

Any analysis of heavy dependence on non-auto trips needs to be supported by the present circumstances. What are the percentages of non-auto trips in the South Lake Union Neighborhood at the present time? Do they come anywhere close to the percentages found in the DEIS? As to transit, an analysis needs to be made of the ridership on the Seattle Street Car lines in the community and how they compare with projections. Similar analysis needs to be made for current transit usage; how will the development of the foregoing alternatives change the current trip patterns?

14

Third, an analysis needs to be made as to the ability of the City or private sources to fund the mitigation measures proposed. The GMA requires that planning for capital improvements should proceed at the same time as land use planning. Local governments are currently in budget crises and an explanation needs to be made as to how each of the transportation mitigation measures will actually be funded and built. For example, new bike facilities for the Mercer project have been deleted; how many more of the suggested facilities will realistically be built by 2024 or 2031? | 15

Fourth, the future estimates for parking usage are provided, but lack background data and have serious deficiencies in analysis. Parking utilization is based on daytime hours only; no analysis is provided for evening hours. Analysis of evening parking is critical as restaurant/bar and other evening uses develop and as visitors to residential uses attempt to find street parking. Current analysis of parking conditions suggests that on-street parking is now fully utilized during the evening hours (see Page 3.13-21). More residential and commercial development will result in increased evening parking demand which must be analyzed and considered. | 16

Fifth, parking analysis needs to be provided for all portions of the subarea, not just those in the southerly portion of the South Lake Union neighborhood, i.e. the area south of Mercer. See pages 3.13-7. | 17

Sixth, in addition, there needs to be an analysis of on-street parking for the built-out periods in 2024 and 2031, with attention to parking supply. Special attention needs to be given to the effect that the buildout of transportation facilities will have on parking supply during the study period, i.e. how many parking spaces will be eliminated by street, transit and bike improvements. | 18

Seventh, the note on page 3.13-1 states that there may be "significant short-term parking impacts as individual projects in South Lake Union build out." Then the footnote explains that parking prices will "adjust to meet demand and travelers will shift to other modes, thus reducing the demand for parking." There needs to be analysis and support for this overly optimistic prediction. Short term visitors to residences, offices, restaurant/bar uses and other commercial uses are unlikely to switch to other modes. | 19

#### IV. OPEN SPACE AND RECREATION.

This section of the DEIS discusses the impact of the density and height on park and open space resources in the area. As with other sections, there are major errors and failure to analyze critical subjects.

First, at page 3.16-4, a table is provided to compare amounts of open space to accommodate the 2024 Household and Jobs goals. However, the plan is intended to | 20

address the 2031 population predictions. Figures must be provided to measure the adequacy of existing open space and recreation area for 2031 growth figures. Further, more detail is necessary to address those areas of the neighborhood that are not meeting identified goals.

20 cont

Second, while there is analysis of open space goals, there is no analysis of recreation areas. Detail needs to be provided as to recreation resources and whether they will be adequate for the 2031 population estimates.

21

Third, many of the supposed existing parks and open space in the "South Lake Union vicinity" described on Table 3.16-1 are well removed from the South Lake Union area. For example, Volunteer Park and Anderson Park are on Capitol Hill and separated by distance and barriers (I-5) from South Lake Union. Park areas should only be listed if they are accessible by walking from the South Lake Union Neighborhood.

22

Fourth, many of the park mitigation strategies (page 3.16-9/10) seem unrealistic. For example, #1 suggests use of tax revenues to fund park facilities. This funding would require changes in statutory authority. Mitigation through the capital facilities planning (#2) requires that the City prioritize South Lake Union, but analysis must be provided as to whether funding for such facilities will be available during the current budget crises. Item #3 refers to providing facilities as a part of new development, but analysis is necessary to assure that such facilities are not only public in name, but inviting to the public, not facilities such as interior courtyards useful only to building tenants or retailers. Again, capital facilities planning must accompany land use plans under GMA.

23

Fifth, page 3.16-5 states that the North Downtown areas requires eight additional acres of parks and open space to meet standards by 2024. What will the requirements be by the planning period set forth in the DEIS of 2024 or 2031? Further, given budget restraints, will eight acres of new parks actually be built in the area to meet needs?

24

#### V. CAPITAL FACILITIES.

The DEIS identifies deficiencies in sewer capacity within the South Lake Union Neighborhood. DEIS at 3.15-7. However, there are blithe assumptions that these problems will be resolved by the individual developers of new projects. *Id.* However, there is no basis on which such individual developers will replace or repair system wide facilities. GMA requires at RCW 36.70A.070(3) and (4) that capital facilities and utility strategies be a part of comprehensive planning. These also include plans for financing such necessary improvements. This section of the DEIS requires thorough analysis of the impacts on utilities, what improvements may be required and how such facilities will be funded.

25

VI. ALTERNATIVES.

Alternatives are the key element of SEPA decision making and all reasonable alternatives must be considered in the EIS. Agency analysis must be open-minded and public proposals in particular should be described in terms of objectives rather than preferred courses of action. This is especially true for a non-project action such as the adoption of sub-area plans such as that for the South Lake Union Neighborhood. Reasonable alternatives are those that approximate the proposal's objectives at a "lower environmental cost or decreased level of environmental degradation." WAC 197-1-440(5)(b). In the present DEIS, alternatives are not adequately considered for the reasons stated below.

26

First, the alternative analysis is deficient for failure to include a downzone of the subject area. A reduction in height and density must be considered, especially where it meets goals for preservation of views to Lake Union.

Second, The analysis is also deficient because it does not include the alternative of distributing new growth to other locations within the City.

Third, an additional alternative for review purposes is to defer any decision to modify the height and density standards in the South Lake Union Neighborhood until a comprehensive and coordinated review can be made of all Seattle neighborhoods. An explanation needs to be provided of the costs and impacts of deferring South Lake Union decisions.

In conclusion, this comment letter has shown that the DEIS is deficient in several areas. In addition, accelerating consideration of 2031 growth goals in the South Lake Union Neighborhood ahead of other areas of the City violates important goals and policies of the GMA. As such, the City is better advised to defer further effort and expenditure until it undertakes planning for the entire city, as scheduled for 2014. If the City is intent on proceeding on this dubious course of action, the DEIS should be completely rewritten and recirculated for comment to incorporate the comments found herein.

27

Thank you for this opportunity to comment on this DEIS. Please send me a copy of the next EIS prepared by the City.

Sincerely yours,

ARAMBURU & EUSTIS, LLP



J. Richard Aramburu

JRA:cc

cc: LUOA

**Lake Union Opportunity Alliance  
LUOA**



Lloyd Douglas; President  
Chris Gemmill; Vice President  
Brian Ramey; Secretary  
Lorie Groth, Treasurer  
John Pehrson; Past President  
Kevin McCarthy  
Donald Bennett  
Jim Goodspeed  
Kristina Barnes

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Seattle, WA 98102  
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Web: <http://www.luoa.org>

April 10, 2011

James Holmes  
Senior Urban Planner  
City of Seattle Department of Planning and Development  
700 Fifth Avenue, Suite 2000  
Seattle, WA 98124

Re: DEIS for South Lake Union Height and Density Alternatives.

Dear Mr. Holmes:

Lake Union Opportunity Alliance finds numerous flaws within the Draft EIS for South Lake Union as well as potential legal errors and we appreciate the opportunity to comment.

- LUOA has retained Richard Aramburu of Aramburu & Eustis, LLP to comment on our behalf from a legal perspective. Mr. Aramburu's comments will be submitted separately but are attached here as well. | 1
- LUOA also commissioned Christopher Ferrell of CFA Consultants (a transportation planning and research firm) to review and provide commentary on the Transportation section (3.13) of the DEIS. Mr. Ferrell's Memo will not be submitted separately and is included herein. | 2

**It is the position of Lake Union Opportunity Alliance that the Draft EIS was not properly edited prior to being released to the public. We believe that the omission of this critical step caused significant negative impact on the public's ability to understand and provide appropriate feedback on the DEIS. As having an editor is an expected practice for a professional technical document, we strongly recommend that a REVISED Draft EIS be released along with an additional comment period prior to developing the Final EIS.** | 3

The bulleted list below is a **summarized list of items** LUOA finds to be misrepresented, missing, or deficient in the DEIS and our requests for correction. Following the summary, you will find the more detailed explanation of various points from our contributing Board Members. **These comments may or may not be submitted individually so please review this document in its entirety for the purposes of your response to Public Comments.**

- First, the summary section of the EIS needs to be more informative, quantitative, and objective in order for the general public to understand the impacts in a timely manner. | 4
- LUOA formally requests an EIS free of misleading “sales pitch” style terminology. There are a multitude of examples to choose from - here is one: | 5
  - Page 1-18 states in reference to Alternative 1, “Building heights increase *slightly* in the block north of Mercer.” A transition from 240’ to 300’ to blocks currently zoned at 40’ is not ‘slight.’
- Disclose all entities who contributed to the construction of the DEIS document with all potential conflicts of interest made transparent to the public. | 6
- On page 1-55, it states “There are no significant unavoidable adverse impacts identified for any of the elements of the environment, except Transportation.” This is a false statement and needs to be corrected. | 7
- The Shoreline Management Act prohibits the shading of water bodies with new development. The allowance of tall buildings next to the lake and the admission that these buildings will shade the lake seems to be a clear violation of the State Law and is ignored in the DEIS. The EIS must address this issue. | 8
- The “Growth Targets” for 2031 on Page 2-7 are extremely aggressive for SLU, have not been adopted by City Council, and are not incorporated in the Comprehensive Plan. These targets are inappropriate, inconsistent with policies of the Growth Management Act, and should not be used or considered for any purpose. | 9
- The entire document fails to address flight path issues – FAR77. Specifically, but not limited to page 1-13, page 1-15, page 1-35, and page 2-9 all illustrate inadequate study. The City must address this issue and not leave it in the hands of private corporations to determine the safety of the neighborhood. | 10
- Page 1-18 and 1-19 incorrectly characterize Alternatives 1 and 2 as a step-down to the lake. Alternatives 1 and 2 do not step down and this must be corrected. | 11
- While making the assertion that it “does,” the DEIS fails to address “how” an increase in height and density, which increases land values and moves from wood-frame construction to the more expensive steel and concrete, will actually increase the amount of low-income housing and affordable housing within SLU. High-rise housing is the most expensive per square foot and could eliminate new, low-income housing in SLU. This needs to be defined in the DEIS. | 12
- The Housing section (3.9) contains incomplete and inaccurate inventories of current housing available within SLU. This should be corrected. | 13
- One-day shadow studies are inadequate and shadows will have a major environmental impact on the public spaces of Denny Park, Cascade Park and Lake Union Park. Also, shadow impacts on page 1-19 suggest the impact is similar for all Alternatives. This is incorrect and must be addressed in further study. | 14
- The DEIS states that birds and fish species dependent on the lake will be adversely impacted by the build-out but fails to explain how the city will protect against the adverse environmental impacts in any Alternative to public health, the land, the vegetation and wildlife which are currently part of the Lake Union environment. This must be addressed. | 15
- In the Water Quality section (3.3) the DEIS fails to identify the baseline Combined Sewage Overflow (CSO) volumes for each of the six current outfalls into Lake Union. It further fails to indicate what the volumes of CSO’s will be upon full potential build-out of any Alternatives. The fact that the DEIS states that there will be unavoidable Combined Sewage and Storm-water Overflows into Lake Union in the future is unacceptable and is clearly a possible substantial adverse impact that must be studied. | 16

- The DEIS ignores the rights of recreational and commercial users of Lake Union for reliance on wind currents which provide public enjoyment of sail boat recreation and tourism. The DEIS does not address potential wind-wakes that could adversely impact sailing on Lake Union. This should be studied. | 17
- Tower spacing is an issue that should be addressed in the EIS. There is a general feeling that towers being proposed will be "slim" like those of 6,000 to 8,000 squared feet as seen in Vancouver and Belltown. But the proposals for two towers per block in SLU with floor plates of 10,500 to 24,000 square feet are NOT slim and the DEIS fails to adequately address the impacts of this in multiple sections throughout the document. | 18
- Table 2-3 indicates that an office tower with a floor area of 24,000sf will be awarded to a developer who owns 22,000sf of property. This is an obvious oversight that needs to be addressed. | 19
- The Land Use section (3.8) fails to examine the potential of South Lake Union to be overrun with commercial development based on the incentives offered in Alternatives 1 and 2. There is nothing in the DEIS discussing incentives or controls to allow for a vibrant retail, recreation, or living environment in a future South Lake Union under any of the proposed Alternatives. This must be addressed in the EIS with specific relation to, among other things, a primary goal of SLU's Neighborhood Plan to "balance housing and job growth, providing a live/work neighborhood" and the UDF's recommendation for enhancing community character "by requiring pedestrian-oriented uses along Westlake Ave. N and Valley St., and exploring requirements along other streets." | 20
- The entire Aesthetics section (Chap 1 and 3.10) is filled with misrepresentations and inaccuracies. They must all be addressed and corrected in a manner that more fully represents the true impacts of the proposed Alternatives on SLU. | 21
- The Transportation section (3.13) is woefully inadequate to the task of studying the potential transportation impacts in South Lake Union under the proposed Alternatives. Many of the suggested mitigation strategies appear to be pipe dreams at best. Realistic proposals are required along with a complete and thorough transportation study based on this urban neighborhood and Seattle's track record of mitigating traffic concerns. | 22
- The Air Quality section (3.2) is heavily tied to the flawed studied in the Transportation section. Poor assumptions and modeling in 3.13 can have a substantial and direct impact on the health of the residents and employees of SLU and this must be studied. | 23

We realize this is a long list, but it merely emphasizes the breadth of the deficiencies within the Draft Environmental Impact Statement itself.

What follows is more in-depth commentary from the contributing Board Members of Lake Union Opportunity Alliance along with the letter from Mr. Aramburu and the memo from Mr. Ferrell. We look forward to each of these points being addressed in preparation for finalizing the forthcoming EIS.

Thank you for your time and attention to detail in the coming weeks.

Chris Gemmill  
Vice President, LUOA

Comments on SLU Rezone Draft EIS  
John Pehrson, Past President, LUOA Board of Directors

**A. Section 1.7**

On page 1-55, it states "There are no significant unavoidable adverse impacts identified for any of the elements of the environment, except Transportation." This is absolutely false for other elements beyond Transportation. The following is only a sample of impacts that are 'significant and adverse'. They are avoidable only if the underlying Alternative is materially changed.

24

1. Building heights allowed that would impinge upon airspace and aircraft flight
2. Wind wakes from buildings that would make landing and takeoff on the lake unsafe
3. Wind wakes from buildings that would adversely affect sailing now enjoyed by thousands on the Lake Union.
4. Building towers in an area of potential liquefaction
5. Destroying the 'step-down' zoning of concept of SLU and thereby adversely impacting the environment of existing residents and workers (in SLU and adjacent neighborhoods) that is currently protected by zoning regulations
6. Impacting the views from designated Scenic Routes.
7. Noise impacts on occupants of buildings allowed by these alternatives that would surround the landing and takeoff paths of aircraft
8. Lack of any tower spacing requirement for residential and commercial towers
9. Shadow impacts on Lake Union Park and SLU residents
10. Proposing population increases of up to 30,000 and no provisions for children (schools, play grounds, affordable family housing).

**B. Growth Target Analysis**

On Page 2-7 "Growth Targets" the City has assumed extremely aggressive growth targets for SLU for the period from 2024 and 2031. These are inappropriate and should not be used or considered for any purpose. First, they are not a part of a rationale, comprehensive allocation of growth beyond the 2024 growth targets across Seattle and they are not a part of the City Council approved Seattle Comprehensive Plan. Second, with the very aggressive growth targets for SLU through 2024, SLU would clearly be the urban Center with the most intense development (housing and commercial) outside of Downtown and about 50% beyond those adjacent Urban Centers. Charts on this have been provided to the City under previous cover and are attached. Use only growth targets from the Seattle Comprehensive Plan.

25

**C. Tower Spacing and limitations**

1. There is no tower spacing proposed, so towers could be 18' apart. There should be an absolute tower spacing requirement of 100'. Otherwise the environmental impact of 400' towers 18' apart must be considered.

26

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- 2. Limiting towers to lots of 22,000 sq. ft. does not limit to 2 towers per block. If developers get or have an alley vacation, blocks can be as much as 79,000 sq. ft., allow 3 towers per block. | 26 cont

**D. Flight Path issues**

- 1. On page 1-35 there should be a safety buffer beyond the defined flight paths both vertically and horizontally. | 27
- 2. Wind analysis should clearly show the limitations on tower height in the blocks surrounding Lake Union and Lake Union Park. | 28
- 3. Wind analysis should result in definitive reductions in height from Denny Way to water. It is only addressed in general.
- 4. The impact of building wakes on sailboats all over Lake Union must be considered. Those impacts, because subtle changes can affect sailboats, will be much more widespread.
- 5. On Page 2-9, in section 2.2.3, Figure 2-4 only shows the flight path to and from the Southwest portion of Lake Union. We have understood, and have certainly observed, flights over the Southeast portion of Lake Union. Why is this not shown and taken into account? | 29
- 6. Page 1-13 Noise impacts, inadequately differentiates between Alternatives #1 and #2 from the existing zoning. In the former, the aircraft would be landing and taking off between 240' or 300' towers. In #4 all buildings are below the flight paths. Remember the 'third runway issues'. This factor is also ignored on page 1-32 and clearly mitigation is necessary if towers are to surround the flight paths. This environmental issue is real, whether Seattle's noise codes recognize it or not. | 30
- 7. Page 1-15 states that there is no problem because building height limits would remain, as they currently exist. This is false. There is no problem because the current zoning limits do not impinge on or surround the flight path. |

**E. Step-down to the Lake**

- 1. Step down is de facto Seattle Policy (see downtown and Belltown and current SLU zoning) so should be recognized. Benefits of step-down should be more clearly stated. | 31
- 2. Page 1-18 the top row is full of falsehoods in characterizing Alternative #1 and #2 as step-down. See attached three Step-down charts that clearly show that fallacy. This must be corrected. | 32
- 3. Page 1-35 "Wind Analysis" should specify some degree or scope of the step down required to eliminate wind impacts on aircraft landing and taking off and on sailboats on the lake. | 33
- 4. The impact of destroying the 'step-down' zoning concept of SLU and thereby adversely impacting the environment of existing residents and | 34

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workers (in SLU and adjacent neighborhoods) that is currently protected by zoning regulations must be recognized in the final report.

34 cont

**F. Cascade Neighborhood Zoning**

All of Cascade should be protected, as it is about 75% built out and has developed its own neighborhood character, with diverse housing, market rate housing, small commercial buildings and human services.. All the blocks of Cascade should be included, including all those between Fairview and Minor.

35

**G. Diverse Housing**

1. On Page 1-16, the report needs to explain how increasing the allowed zoning density (increasing the land values) increases the amount of low-income housing.
2. On page 1-16, the report needs to explain how increasing the allowed zoning density increases the construction of affordable housing. High-rise housing is the most expensive per square foot and has no record of its use as low-income housing. Alternative #1 and #2 zoning would eliminate new low-income housing in SLU.
3. On page 1-16, it says Alternative #4 would reduce development of low income housing, even though zoning of 65', 75' and 85' encourages wood over concrete, a more affordable housing construction, and universally used in Seattle for subsidized housing. This zoning has encouraged significant low-income housing in Cascade and the rest of SLU. Correct this false statement.

36

**H. Schools and Family Friendly issues**

Schools and family-friendly issues should be addressed under Public Services and Utilities per SMC 25.05.444. Per the Draft EIS there are, as of 2009, about 2940 Housing Units (about 4410 people based on 1.5 people per housing unit). The residential capacities and increases from 2009 numbers is shown below:

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Alternative	Residential Capacity	Increase from 2009
#1	35,874	31,464
#2	32,943	28,533
#3	26,941	22,531
#4	21,636	17,226

These kinds of population growth represent the equivalent of a small City. We see no provisions for a family-friendly environment, like schools and sports playfields and special considerations for multi-bedroom, affordable units. Further, particularly for Alternative #1 and #2, the predominate residential building form will be a high rise apartment/condo tower, the most expensive form of housing and the most unaffordable for young families. Does the City plan for this neighborhood to be devoid of children, with the resultant negative impact on

community (stability, safety and comfort)? What provisions are there for school sites, playfields for children and young adults, more economical housing types like townhouses or five floors of wood over concrete? This void must be corrected in the Final EIS.

37 cont

**I. Aesthetics**

1. Sections 2.3.3, 2.3.4, and 2.3.5 define the three alternatives with increased zoning. All allow about a 75% increase in bulk and scale for commercial buildings throughout most of SLU. Current zoning allows FAR of 3, 4, 4.5 and 5 for an average of 4. These alternatives allow FAR's up to 7 with bonuses. There is only one building currently in SLU with this bulk/FAR, and that is on Boren between Thomas and Harrison. A second such building is just starting on Boren between Thomas and John. These are a result of a special concession granted to Vulcan/Amazon, increasing the FAR from 3 to 7. The impact of 20 to 25 such buildings in SLU, two or more to the block, has not been adequately considered in this EIS. Not only is the bulk oppressive, but by taking credit for a large lot, they can also be high. The alternatives allow these 24,000 sq. ft. floor plates up to 240' high! Compared to residential towers of similar height, these buildings (using the example of the current building) are bland with no decks so they lack life and have over twice the horizontal impact or bulk. In addition their street level facades are monotonous for entire blocks. This is inherent, as the architects design a solid base to mount the bulky tower. All the emphasis seems to be the impact of residential towers on aesthetics, light, glare, shadows, air circulation and wind impacts on others. These analyses must also include a representation of these bulky, boring commercial buildings throughout SLU and their impact on the environment.
2. Page 1-18, second row, gives a very misleading statement, implying that the towers proposed are slim. Towers in Vancouver are about 6,000 sq. ft.. Towers in Belltown are from 7000 to 8000 square feet. In Belltown, 8,000 sq. ft. towers not a legacy of the past; 8000 sq. ft. towers up to 240' in height are being proposed today. These SLU towers are 10,500 square feet on top of bulky podiums of 45' to 85'. This document should reflect these appropriately. Two or more of these per block, and on tens of adjacent blocks would be oppressive and that impact must be considered.
3. Page 1-17 ignores the impact on adjacent neighborhoods of the residential towers on the area context and view. This includes Capital Hill, Denny Triangle, Belltown and Uptown.
4. Page 1-17 ignores the impact on area views within SLU that are currently protected by current zoning and would be totally destroyed in different amounts by Alternatives 1,2 and 3.
5. Page 1-17 ignores the fact that for some blocks, the proposed podiums are twice as high as the total allowed height under current zoning. (e.g. blocks between Mercer and Valley)

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39

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6. Page 1-17 trivializes by statements like "similar to but less than Alternative 1". Professionals should be able to do better than that. | 40 cont
7. Page 1-18 'Viewsheds' is just plain false. These alternatives do impact views; they just don't totally wipe them out. Losing the supporting structure of the Space Needle is an impact on the view of the Space Needle. Views from carefully selected points that 'frame' the Space Needle between distant towers is 'cherry picking'. | 41
8. Page 1-18 'viewsheds' should also take into account view impacts from within SLU and from non-designated viewpoints. This is a potential rezone, and not an individual project; so all views are in play.
9. Page 1-18 'viewsheds' says all view impacts from all alternatives are similar. This is false to any reasonable person. This must be corrected.
10. Page 1-18 'viewsheds' must list impacts to each scenic route specifically and the extent, by alternative, that these are compromised.
11. Page 1-39 discusses views from protected viewpoints, but this area rezone must consider general views also. | 42

**I. Shadows -**

1. Page 1-19 Shadows is entirely unacceptable. To say that the shadow impact of Alternative #1 and #4 are similar throughout the day is not factual. | 43
2. Page 1-19 Shadows should be based on quantified data in some manner. Professionals should be able to quantify by sq. ft. of shadows or blackness of the area to allow rational comparisons to be made.
3. Page 1-19 shadows on Lake Union Park should be highlighted for all four seasons but particularly from September to March, critical months for light in Seattle.
4. On page 1-30, 'Plants and Animals', the different shadow impacts of the 4 alternatives on plants should be discussed. Obviously Alternatives #1 and #2 have greatest and most profound impact. | 44
5. On page 1-40 under 'Shadows', it merely lists what is in the land use code. Which of those is recommended in this general case and how much to mitigate the huge increase in shadows? | 45

**K. Blocks South of Lake Union Park, between Valley and Mercer**

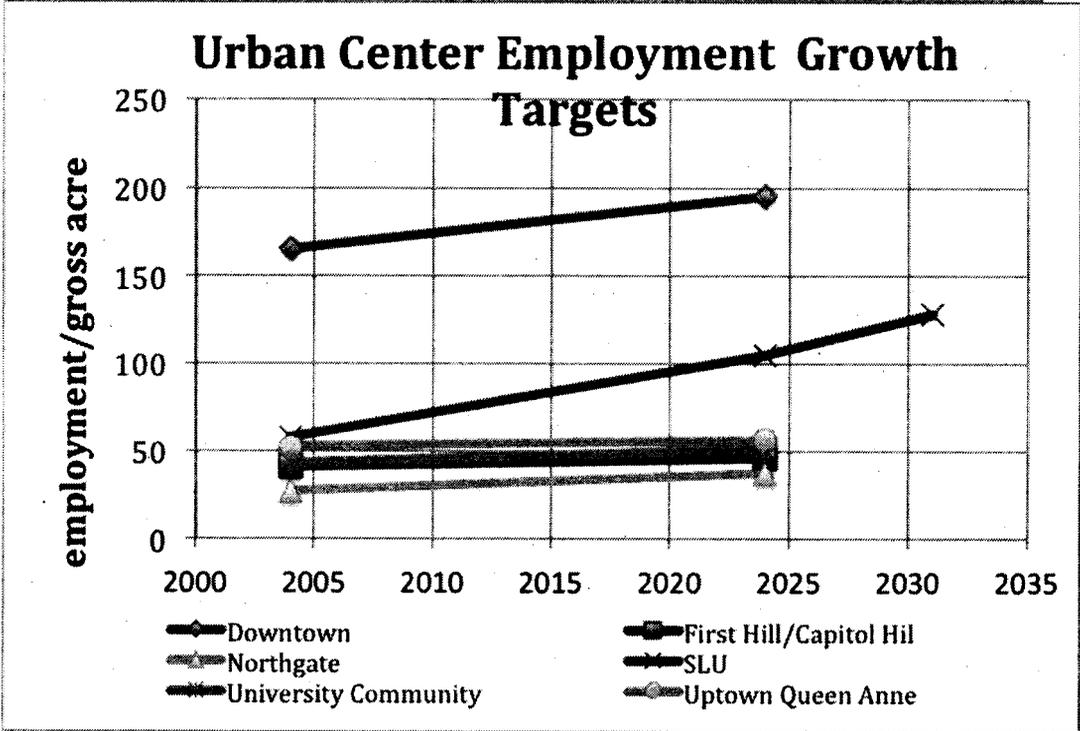
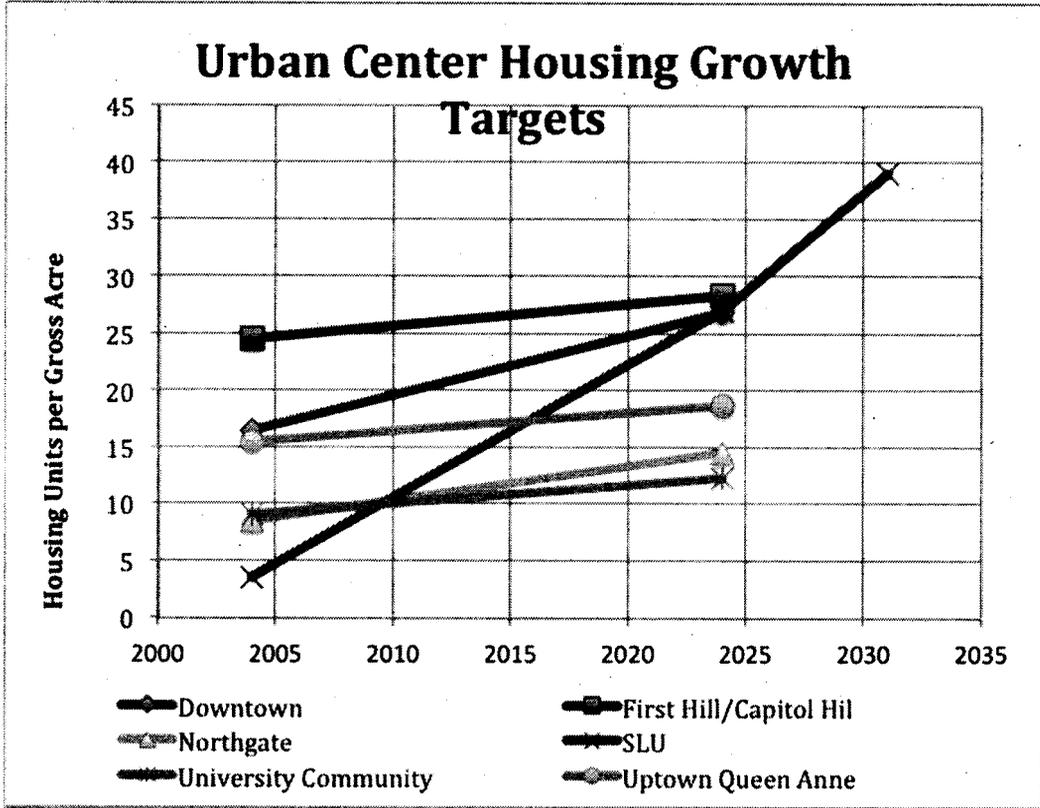
1. The impact of building wind wakes on aircraft landing and taking off should limit building heights to existing zoning. | 46
2. Page 1-19 shadows on Lake Union Park should be highlighted for all four seasons, but particularly from September to March, critical months for light in Seattle. The mitigation for these damaging shadows should be to limit building heights between Valley and Mercer to eliminate them. | 47
3. The impact of building wakes on sailboats all over Lake Union must be considered. Those impacts, because subtle changes can affect sailboats, | 48

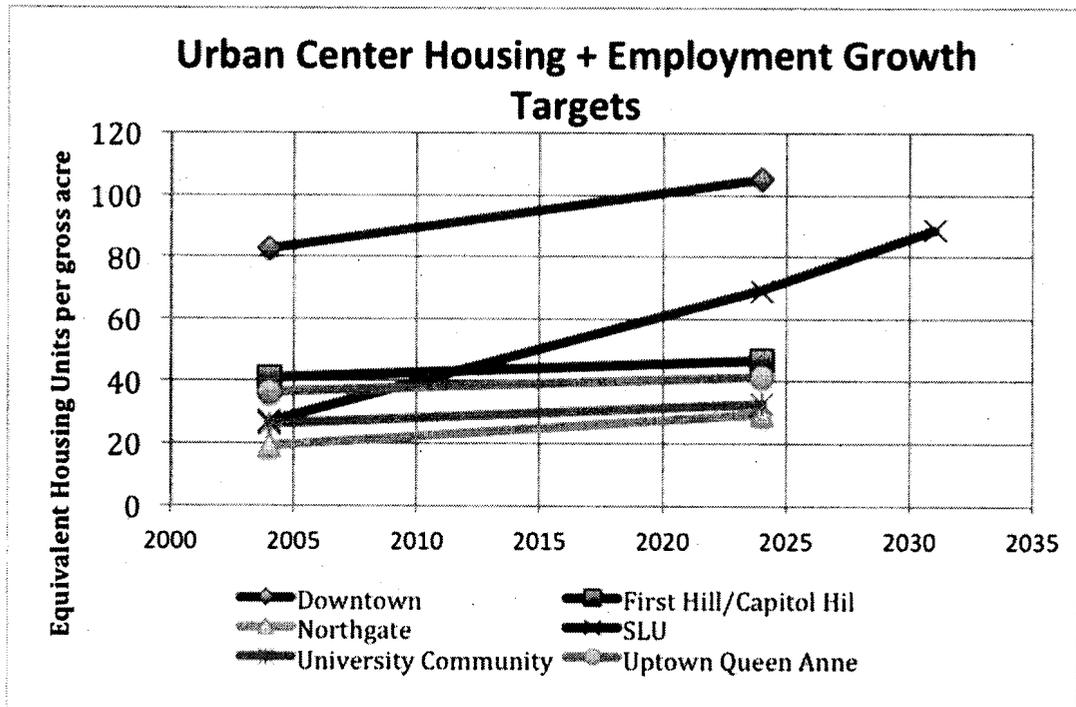
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- |   |         |
|---|---------|
| will be much more widespread. The logical mitigation is limiting building heights in this area to existing zoning.  | 48 cont |
| 4. All of the issues outlined above under Step Down call for limiting the heights in this area to existing limits.  | 49      |
| 5. Page 1-28 should identify mitigation to account for the risk of the Liquefaction zone surrounding Lake Union. Should build mass be limited? Should certain kinds of construction be called for?  | 50      |
| 6. Page 1-9 Geology and soil should state that in areas close to Lake Union, ground water will likely limit underground parking to one floor, so with a tower, much parking will have to be above ground which is damaging to the esthetics and pedestrian environment. | 51      |
| 7. The SLU growth targets in the Seattle Comprehensive Plan do not justify increasing the allowable building heights in this area from 60' to 160' to 300'.   | 52      |

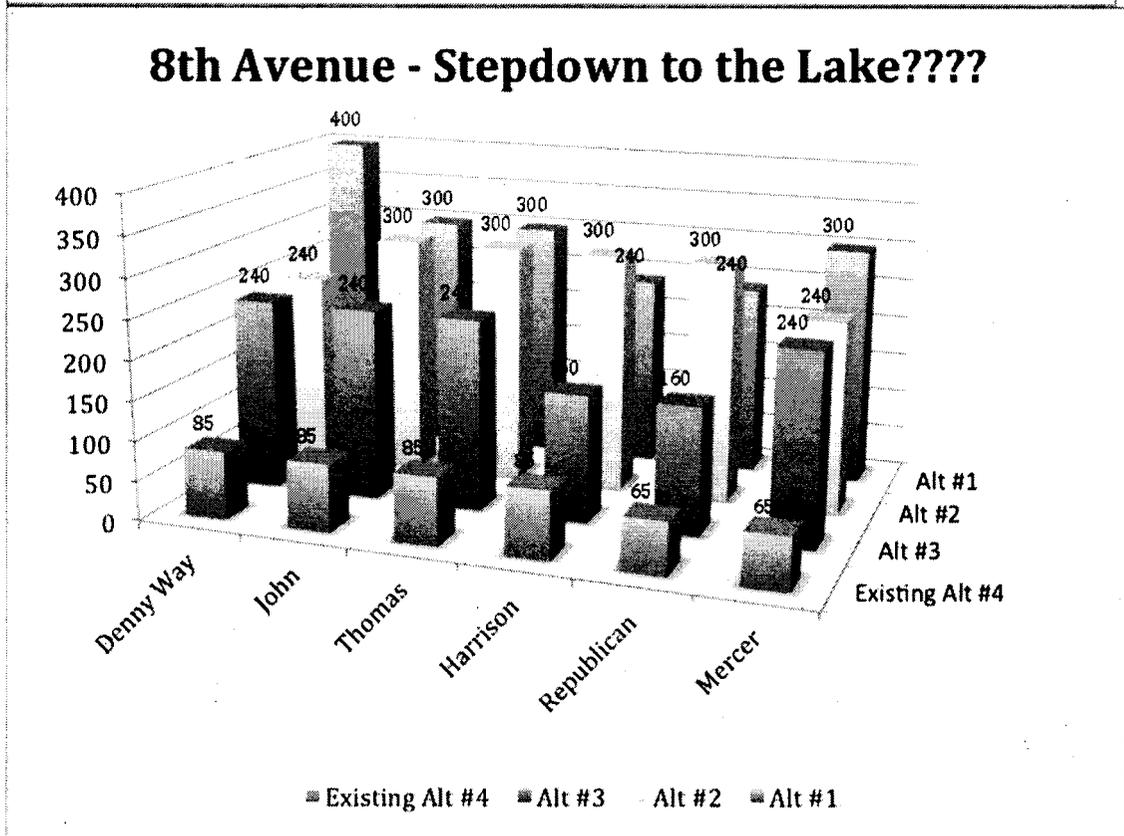
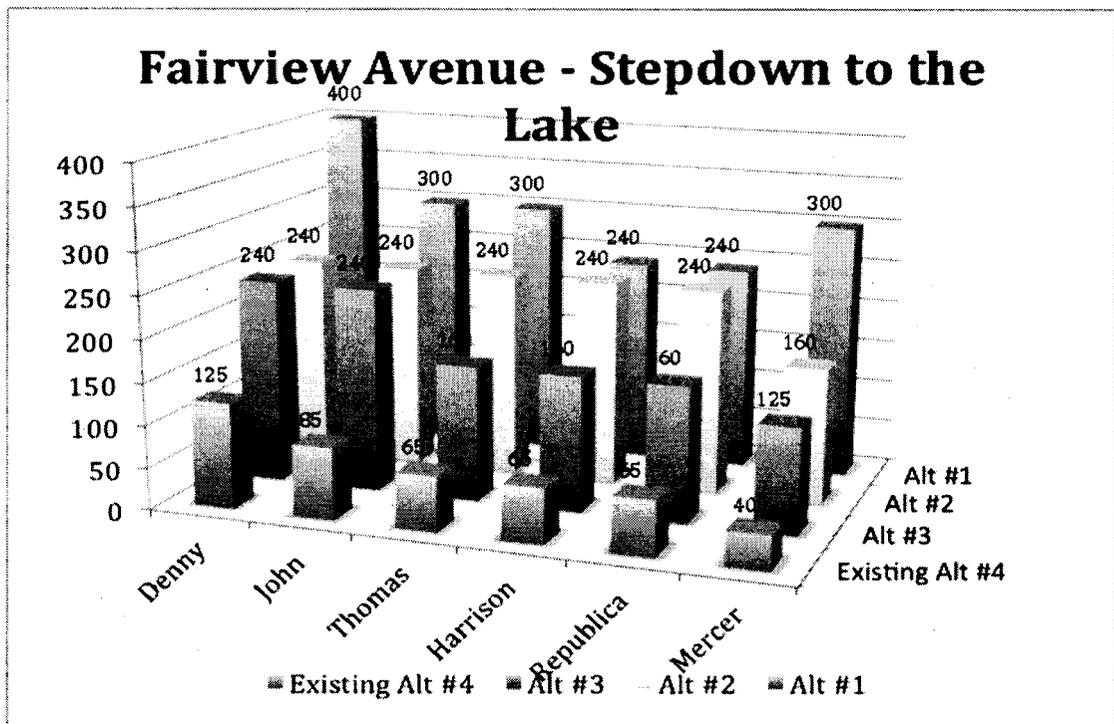
**L. Blocks West of Lake Union and Lake Union Park**

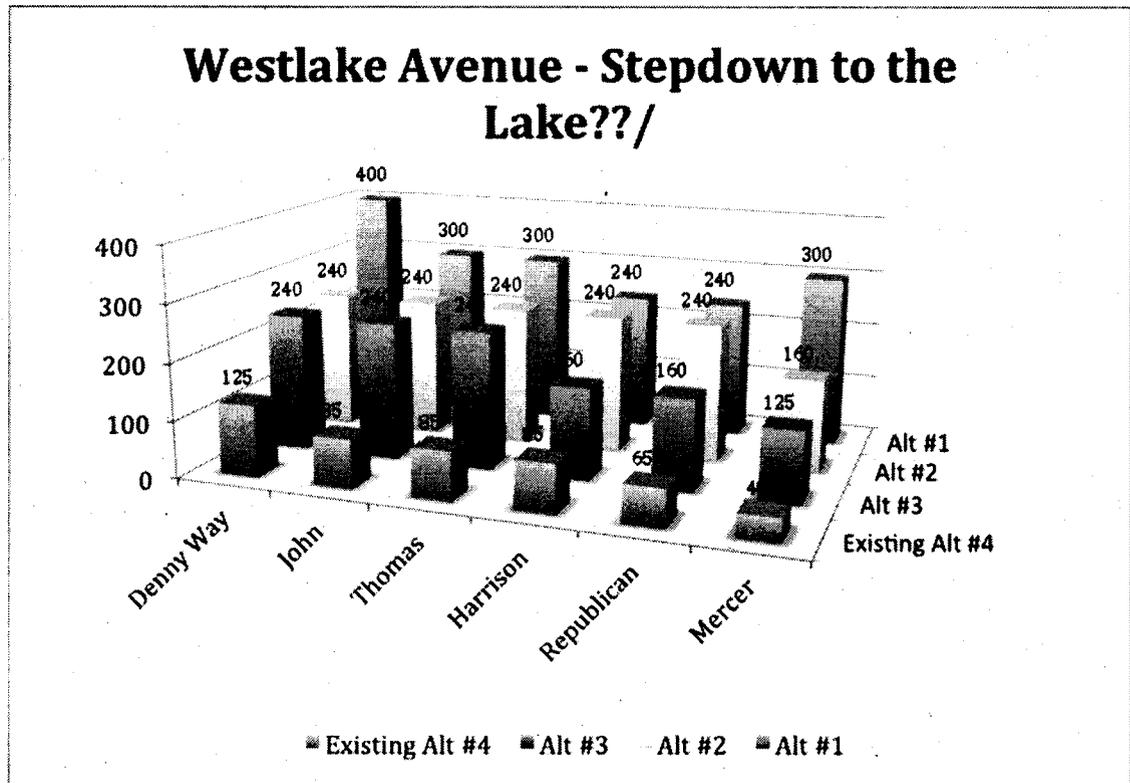
- |   |    |
|---|----|
| 1. Steep slopes, slide areas, and the flight path should limit zoning on the west side of Lake Union Park/Lake Union from Mercer north to the current zoning of S/M 65.   | 53 |
| 2. The impact of building wind wakes on aircraft landing and taking off should limit building heights to existing zoning of 65'.  |    |
| 3. The impact of building wakes on sailboats all over Lake Union must be considered. Those impacts, because subtle changes can affect sailboats, will be much more widespread. The logical mitigation is limiting building heights in this area to 65'. |    |
| 4. All the issues outlined above under Step Down call for limiting the heights in this area to existing limits.   |    |
| 5. Limiting zoning in this area to the current S/M 65 would not only recognize these hazards, but protect the existing views from the east side of Queen Anne toward Lake Union.  |    |





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### 1. Summary

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The summary section of the EIS needs to be more informative, quantitative, and objective in order for the general public to understand the impacts in a timely manner. The complete EIS is justifiably a large and thorough document, but it must be recognized that is also for the citizens of Seattle who volunteer their time and effort to help shape their neighborhoods.

Currently the summary reads as vague and even subjective. For example: page 1-18 states in reference to Alternative 1, "Building heights increase *slightly* in the *block* north of Mercer." First, a transition from 240' to 300' in a zone currently designated as 40' is not 'slight.' Second, 'block' should be pluralized, as there is more than one block north of Mercer. Third, there are several blocks (in fact, 24+) that do not step down at all between John St. and Galer St., extending substantially north (and south) of Mercer. People could interpret this as not only subjective, but misleading.

There are several more examples like this – many of them noted in John Pehrson's and others' comments. I would ask that the entire summary be revisited in this manner with the intention of being informative and meaningful to the public.

### 2.3 Proposed Action Alternatives

Table 2-3 indicates that an office tower with a floor area of 24,000sf will be awarded to a developer who owns 22,000sf of property. It is also characterized that this oversized floor plate will somehow be 'set back' from its podium base. It is understandable that such issues will be remedied during the zoning process, but what is not clear is how the assumptions for density capacity have been made throughout the body of the EIS. Please clarify.

55

### 3.8 Land Use

#### Mixed-Use Commercial Areas

It states on 3.8-11 that "All of the EIS Alternatives would increase residential and employment density within the South Lake Union Urban Center." While technically this is true (even for Alt 4), it is as general of a statement as saying "the neighborhood will grow." It should be noted that it is likely that Alts 1 & 2 will tip the delicate mixed-use balance into predominantly office use. Property values are a bargain compared to the downtown office core, but relatively expensive by Seattle neighborhood standards. *Incentivizing* office use will exasperate that condition. The reason the neighborhood has not already gone completely office is because the larger corporations and institutions are having a difficult time squeezing into the current zoning envelop. Numerous variances and exceptions have been made for Amazon and UWIII, but not for housing. It is then a flawed argument to imply (as on 3.8-13) that Alts 1 & 2 will "promote a variety of housing types." Rather, there will be a small amount of high-end residential, which will force a trace amount of low-income housing in what will be an unwelcomed and unsupported environment (i.e. no schools or services).

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#### Affordable Low Income Households

The myth needs to be put to rest that high-rise residential buildings will naturally result in more affordable housing. It is rare if it ever happens at all without government subsidies, such as “The Projects” throughout the nation. The concrete and steel construction otherwise puts the cost out of reach, no matter how many units are stacked on each other. The false argument has been heard numerous times around this public process by laypeople and city officials alike. The DPD should educate this conversation when appropriate, and the EIS would be a good place to begin.

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### **Transportation**

In cities with rapid transit, true urban centers naturally develop at the transit stops. This is how residents of Chicago or New York, for example, can confidently forgo owning a car. They can quickly visit places of work, eateries and culture within a few minutes walk of a transit station that did not get stuck in traffic or make stops every quarter-mile. Page 3.8-20 states that “There are no bus rapid transit or light rail lines planned in the South Lake Union neighborhood,” yet Alt 1 & 2 show Manhattan-like neighborhood densities. Furthermore, with no rail planned for the 520 bridge (or the 99 tunnel), it is hard to believe the city will change course. The types of businesses moving into SLU have strong ties with Bellevue and Redmond. To what degree that ‘everyone who works here will live here’ is unsubstantiated, and the outcomes of the traffic studies are not credible.

58

### **3.10 Aesthetics**

The computer-generated models of the architecture are inaccurate. It is hard to determine all of the mistakes due to the poor selection of views that hardly inform the reader of the realities of the densities (which should be remedied for the EIS), but here are a few:

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**Figure 3.10-2 Full Build-Out:** The ‘two tower per block’ does not appear to its full manifestation south of the Mercer blocks; the podiums of the Mercer blocks are wrong; the Mercer towers are not set back from Valley – does this reflect a policy of which we are not aware?

**Figure 3.10-4 Full Build-Out:** Either the Mercer block podiums are wrong, or it is showing two towers per block – one office and one residential.

**Figure 3.10-6 Full Build-Out:** Same mistake as above.

**Figure 3.10-8 Full Build-Out:** Not sure what is being shown at Mercer blocks. If it is the current incentive, the upper setbacks do not appear correct. Is it the Lab benefit assumption? It is certainly not the 40’ zoning. Please clarify or correct.

**For all street-level views:** Please add scale figures and an auto in order for the layperson to understand the scale at all street-level views.

**Figure 3.10-12:** This is both inaccurate and misleading. The podium heights north of Mercer are 85’ – taller than the existing buildings shown south of Mercer, so it is therefore inaccurate. It is also misleading that the towers do not appear in this view because they are not set back from Valley in this model, but that is inconsistent with the UDF. Please include a Valley view, and/or explain this new setback policy.

**Figure 3.10-13:** A 1-story podium is shown on the right, even though a 30’ is allowed. That is an unlikely depiction.

**Figure 3.10-14:** The podium for the building on the right is identical to that in 3.10-11 even though the plan indicates there would be a 20’ height difference. Which image, if

any, is accurate? If it claims to be a portion of the block that remains with current zoning, it is shown lower than that of 3.10-20.

**Figure 3.10-15:** This is an inaccurate and misleading depiction showing Alt 1 as being less dense at the waterfront than Alt 2. Now, without explanation in the text, the towers are on Mercer instead of on Valley as in 3.10-12. It is also inaccurate in that there are 2 towers per block – alternating an 85’ office with a 160’ residential.

**Figure 3.10-18:** Once again, showing inaccurately 2 towers per block north of Mercer.

**Figure 3.10-21:** Same comment as 3.10-8. Please explain how the forms were derived north of Mercer.

**Figure 3.10-25:** How was the form on the left derived? The tall portion appears to not use incentive zoning as it is similar in height to the Rollins building. The low portion appears to be part of the incentive form, but it seems unlikely that the corresponding 10,500sf tower would be completely out of view from this vantage point. It is also inconsistent with what is shown in the shadow model, **Figure 29, Appendix D.**

**Figure 3.10-27:** The new building appears to be using existing zoning where 400’ is allowed. Why? This does not reflect the Alt 1 proposed zoning across from Mirabella.

**Figure 3.10-49:** The new building does not utilize its 125’ allowable height. Why?

**Appendix D, Figure 1:** In this view, the Mercer towers have been moved from where they were depicted in the Mercer corridor view 3.10-12. In each case, they have been located in the image to have the least impact as possible.

**Appendix D, Figure 2:** Inaccurate.

**Appendix D, Figure 3:** Inaccurate.

**Appendix D, Figure 4:** ? (See comment on **Figure 3.10-25**)

**Appendix D, Figure 20:** This shows Alt 4 as having taller buildings in the Fred Hutch area than Alt 3, but the zoning heights for each Alt is the same. This mistake carries into the shadow depictions for **Figures 43 and 44**, unfairly showing that Alt 4 casts shadows farther into the water than Alt 3.

**Appendix D, Figure 25:** Perhaps the unbuilt Amazon building would show in this view. Also, 2 towers are identical in height and plan as in **Figure 26** (Alt 1 to Alt 2). One of these images would then not be a fair depiction of the zoning changes.

**Appendix D, Figure 29:** I retract my public statement that the shadows were rendered incorrectly. I see now the mistakes are in the building forms – not the shadows. Also, please put the shadow images with the body of the text – not in the appendix. This is not extra material but essential to their descriptions, and the reader should not have to flip back and forth to understand it.

It is unfortunate but understandable that the city could not afford to build physical models of the 4 alternatives. However, the city should remedy this shortfall by allowing the public access to the computer models, or at the very least, take requests for vantage points where people have concerns. The views shown are either bird’s-eye or on the street. There is a large range of intermediate views that should be incorporated into the EIS to maximize the peoples’ understanding of the densities.

**Transportation - DEIS 3.13:**

Table 3.13-13 of the DEIS indicates all three alternatives would bring several major arterials into failing categories for auto traffic levels - LOS scores of E and F. According to Wikipedia, these LOS Scores mean "every vehicle moves in lockstep with the vehicle in front of it... a constant traffic jam... a road for which the travel time cannot be predicted... more demand than capacity."

61

Maintaining the green of designated "green streets" should be an important consideration. For example, as drivers who are stuck in highly congested conditions seek to find greater capacity, the potential for traffic from Denny (LOS F) and Harrison (LOS E) to overflow onto Thomas St (an adjacent designated green street) is a likely possibility that is overlooked in the DEIS and should be studied.

As the DEIS is essentially impossible for non-city planners or engineers to decipher, LUOA commissioned Christopher Ferrell of CFA Consultants (a transportation planning and research firm) to provide some professional perspective on the DEIS Transportation section. (See attached CFAC Memo.) Based on CFAC commentary, there appear to be several points of serious concern with the DEIS Transportation study:

1. Auto Trip Generation appears to be of concern. The study expects the number of employees in SLU to increase by 58%, and the number of housing units to increase by 83% (most of which are not likely to be single occupant dwellings), while the increase in trip generation increases by a mere 29%. While this increase in trip generation may be in line with expectations, without adequate metrics to clearly validate this seemingly optimistic outcome, a more in-depth trip analysis should be conducted.
2. The ITE Model used to predict trip generation, is industry standard but is (a) based primarily on suburban case studies that may not be applicable to South Lake Union and (b) is known within the industry for weak statistical basis. In light of greater implications of the MXD Model, used to estimate mode shifts, the DEIS results seem alarmingly aggressive at best:
  - The MXD Model is new and based on untested research.
  - Appendix E-4 is unclear and may indicate the estimation model may have been calibrated using generic assumptions as opposed to those more appropriate for the urban environment of South Lake Union.
  - The validation methods used appear to have shortcomings relying on suburban case studies inappropriate for use in South Lake Union.
  - Appendix E-1 inadequately states whether any true correlation exists between the results of the MDX model, used to estimate mode share, and the ITE, used to predict trip generation.
  - The statistics used to validate the model, found in Appendix E-4 appear inadequate to the task: RMSE and Pseudo R-Square for the ITE and MDX methods may produce strong goodness of fit scores while consistently over or under estimating the underlying values being modeled.

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These trip generation increases to just 29% appear are obtained by the assumed implementation of several mitigation techniques found throughout the DEIS that seem to rely heavily on "mode shifts" (presumably from single-occupant vehicles to public transportation) to identify the best-case scenario. (See Table 3.13-16 & 17.) Thus, the DEIS

64

actually illustrates a decrease in the trip count of Alternative 1 at full build-out to levels below what would be expected Alternative 4 with no mode shifts applied. The assumption that *"if we build tall buildings, we will get viable public transportation that people will use instead of cars"* is faulty at best for the Seattle metropolitan area considering the challenges Seattle faces delivering viable public transportation. Seattle is known across the country to be sub-standard in this area, thus it is irresponsible to gloss over this critical issue by using disparate metrics.

64 cont

The proposed mitigation strategies seem optimistic, at best:

- Bicycle & Pedestrian System 65
  - Wider sidewalks will most certainly help, but that is very limited in scope. It seems there is an inordinately high reliance placed on the idea of car-free living in SLU. The Alterra condominium community of SLU as an example has 60 residential units with 110 parking spaces. All spaces are full and there is demand for more. It is a rare occasion during the day that there are more than 30 cars remaining in the garage and residents admittedly commute, by car, to locations as nearby as The Gates Foundation and Nordstrom.
  - Some aspects of the Bicycle Master Plan have shown, through real-world experience in SLU thus far, to carry the potential to create greater auto traffic congestion. One example, related to bike lanes on arterials, is the intersection of Dexter and Mercer. The addition of the bike lane made Dexter a 3-lane road. With 3 lanes, a left turn arrow is now required on Dexter southbound at Mercer. (Presumably northbound as well, once Mercer becomes 2-way.) Along with Roy Street as a tributary and, to a lesser degree, Valley Street, Dexter Ave N is now frequently backed up in excess of 2 blocks during non-peak times of day (10am, 1:30pm, etc.) with drivers waiting to turn left at Mercer. Additionally, lane modifications made to accommodate this same bike lane pose precarious safety concerns for both drivers and bicyclists on Dexter southbound immediately south of the Denny intersection.
- Transit Service Expansion 66
  - The addition of busses and bus routes is a great theory, over which the City of Seattle has no control. In practice, King County Metro has been scaling back service and increasing rates for years and they still project a shortfall in revenue of \$600M through 2013. There are admittedly no plans for Rapid Transit in SLU. The Seattle Streetcar goes virtually nowhere and does not effectively connect to any other service. In general, expansion of these systems and the addition of others is a mitigation strategy that has proven to be a failure time and time again throughout Seattle.
- Potential Mitigation Measure Implementation 67
  - Because the number one suggestion to fund these mitigations is the "South Lake Union Voluntary Impact Fee Program," it sounds as though there may be no way to pay for them. As noted by Donald R. Samdahl in his "Multi-Modal Impact Fees" paper:
    - "The Washington State legislature did not authorize jurisdictions to impose impact fees on modes other than roadways in the Growth Management Act. Seattle had to rely on the "volunteer agreement" provision of the State Environmental Policy Act. This provision is not as effective at raising funds uniformly as the GMA traditional impact fees. **In fact, the City of Seattle has not been as**

**successful in convincing developers to voluntarily use the mitigation payment program as an option to undergoing a more detailed SEPA review.”**  
(Emphasis added.)

67 cont

Essentially, there is not enough detail in the DEIS for an engineer with a PhD and over 15 years of experience in transportation planning and review, to be able to piece together how the study arrived at the its figures. The Final EIS needs to provide information. The study should include accurate trip counts for cars, heavy trucks, mass transit, bicycles, pedestrians, etc. The study should be based on an urban city environment and apples-to-apples case studies. The Final EIS also needs to propose realistic and actionable mitigation strategies that are proven to work in Seattle. In short, a thorough and comprehensive traffic study must be completed and significant growth in South Lake Union must be tied (legislatively) to an agreed upon and funded mobility plan.

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**Air Quality - DEIS 3.2:**

1. Ozone (O<sup>3</sup>) implications:

On page 3.2-4 the DEIS states that, in 1997, the EPA deemed the Puget Sound region a nonattainment area and in 2005, the EPA adopted more stringent ozone standards. The DEIS then goes on to state: "Based on ozone measurements over the past few years, the Puget Sound region seems to again be on the brink of becoming a nonattainment zone" but claims because ozone problems tend to be regional in nature and can be transported far from their sources that "the potential future nonattainment status for ozone would have no direct implications for any of the South Lake Union alternatives."

69

While ozone problems may have a regional propensity and, in the time between emission and formation, can be transported far from their sources, the DEIS seems to imply the source is ultimately irrelevant in hydrocarbon production. No mitigation strategy has been put forth, no future modeling has been done, in fact, no testing has been done at all in attempt to determine whether SLU under alternatives of increased height and density might substantially and adversely impact the region as a whole. All this, while our region is on "on the brink" of producing unacceptable levels of health-based NAAQS for ozone, with no explanation provided.

Ozone levels pose a material public health risk and not testing the environmental impacts "that could occur under worst-case conditions" for the reasons sited in the DEIS is unacceptable to the public.

2. Carbon Monoxide (CO) implications:

On page 3.2-2 the DEIS reports the area of South Lake Union to be a current "maintenance area" for CO emissions and on page 3.2-5 states "the analysis of potential air quality impacts related to the alternatives focuses on traffic and was based on consideration of ambient concentrations of [CO] the could occur under worst-case conditions near congested intersections."

70

The analysis is stated to have been performed at three (3) signalized intersections based on traffic levels predicted for the year 2031 at peak-hour traffic levels of service (LOS). While rationale is provided for the selection of these three intersections, it seems insufficient at best to only examine intersections along Mercer Street that are all just a few blocks from each other. As in the Transportation analysis, there is no mention of potential impacts of air quality at the proposed Republican Street exit of the deep-bore tunnel and other seemingly high impact areas like Denny/Fairview and Denny/Dexter.

Furthermore, directly due to the Transportation analysis (for the reasons sited previously in these comments), the Air Quality analysis may be substantially flawed and shortsighted in understating potential hazards to public health. If the potential flags raised in the Transportation section and a thorough traffic analysis as recommended by LUOA in these comments produce results that are even moderately less favorable, the health impacts on residents and employees of South Lake Union may be greatly compromised.

By default, the DEIS seems to be using the most aggressive methods of analysis to come to the most optimistic result. This is in direct conflict with the stated goal of the analysis in this section - that of determining what "could occur under worst-case conditions"

71

Comments by Chris Gemmill, Vice President, LUOA Board of Directors

and is, again, unacceptable to the public. If the results of the transportation section are to be used in making air quality determinations, a thorough and comprehensive traffic study must be completed.

71 cont

**Full and Fair Disclosure within the DEIS:**

Prominent South Lake Union landholders have several motives in the upzoning rulings that will come to SLU following the Final EIS. While not overlooking their altruistic motives of sustainable design, et.al., a primary driving factor is certainly to maximize their return on investment. Developers, architects and others also have significant financial skin in the game. Nothing comprehensive is found in the DEIS (individual sections, appendixes, credits, etc) where disclosure has been made with respect to the contributing parties of the DEIS document. (Exception drawn to simple source citations for various charts and graphics throughout.) Who, for example, authored the Air Quality section? This is unknown to the public and is a material to the public document. In fact, certain contributors (known privately) are known to have strong business ties with prominent South Lake Union landholders, thus, conflict of interest can easily be assumed without disclosure. In an ideal world, the City would select competent and capable contributors for the EIS without these conflicts but COI is sometimes difficult to avoid. In lieu of this requirement it is my recommendation that all contributors involved in the construction of this public document be disclosed along with potential conflicts they may carry including, at a minimum, a list of prominent South Lake Union landholders and corporations with whom each have business dealings. Avoiding COI is not always necessary but transparency should be the norm!

72

April 10, 2011

## Comments on SLU Rezone Draft EIS

Brian D. Ramey

Thank you for this opportunity to comment.

My Name is Brian Ramey I live in the Eastlake Neighborhood of Lake Union.

### ENVIRONMENTAL IMPACTS NOT ADDRESSED:

### SHORELINE MANAGEMENT ACT IGNORED:

The State of Washington Shoreline's Management Act recognizes that the shorelines and the waters of the state are "among the most valuable and fragile" of the state's natural resources and the State requires that Cities recognize the importance of protecting the shoreline and urban water-bodies.

73

The Shoreline Management Act prohibits the shading of water bodies with new development. The allowance of tall building next to the lake and the admission that these buildings will shade the lake are clear violations of the State Law.

The DEIS states that birds and fish species dependent on the lake will be adversely impacted by the build-out. The Draft EIS fails to explain how the city will protect against the adverse Environments impacts in any Alternative to public health, the land, the vegetation and wildlife that are currently part of the Lake Union environment.

74

### WATER:

Section 3.3.1 through 3.3.12

The DEIS fails to identify the baseline Combined Sewage Overflow (CSO) volumes for each of the six current outfalls into Lake Union. It further fails to indicate what the volumes frequency of CSOs will be upon full potential build-out of any Alternatives. The DEIS does not state whether any additional outfall facilities will be built to allow for additional CSO into Lake Union and what, if any, expected CSO volumes and/or frequencies would be attributable to any new outfalls under a full build-out scenario of any Alternative identified in the DEIS. No mention is made or descriptions outlined in the DEIS of any future needs for Stormwater or Sewage capital facility upgrades within the basin or required improvements to the existing system for any Alternative identified in the DEIS. The face that the Draft

75

EIS states that there will be unavoidable Combined Sewage and Storm-water Overflows into Lake Union in the future is unacceptable and this statement is made without any detail on the actual source of the overflows.

75 cont

What are the projected volumes of sediment deposits into Lake Union as a result of any of the development Alternatives?

Please provide a quantifiable description of the Sewage and Stormwater impacts under all Alternatives.

**LIGHT AND AIR:**

The Draft EIS fails to explain how development will be placed to prevent interference with air and water navigation in Lake Union. This includes Sea Plane and Sailboat navigation. The DEIS ignores the rights of recreational and commercial users of Lake Union for reliance on **wind currents** which provide public enjoyment of sail boat recreation and tourism. The proposed height, bulk and numbers of buildings allowed under Alternatives 1, 2, and 3 will have a major impact on the future viability of the Tuesdays Duck Dodge due to major buildings shielding natural wind currents over the lake creating dead zones where none existed before.

76

The creation of **Shadows** will have a major environmental impact on the **public spaces** of Denny Park, Cascade Park and Lake Union Park. No mitigating measures are proposed.

77

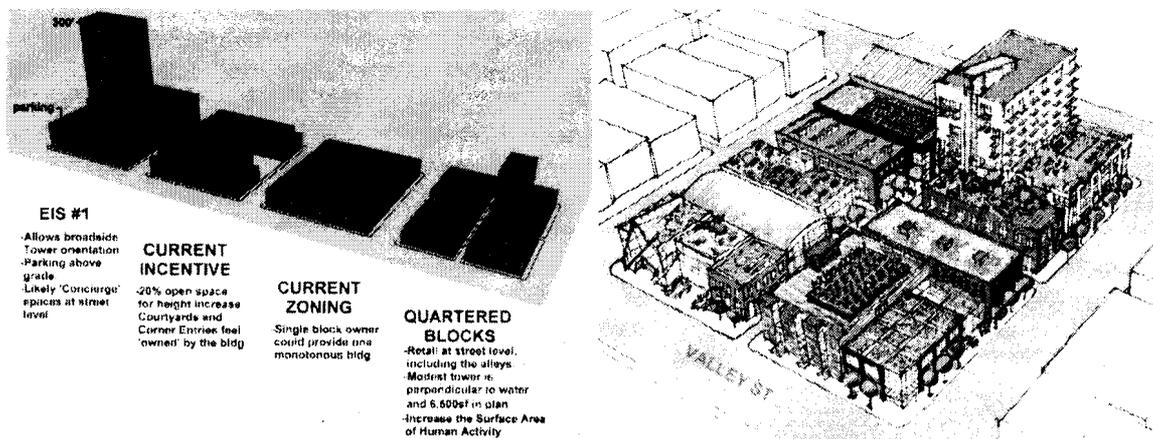
I do not believe that we are creating the incentives or controls to allow for a **vibrant** retail, recreation, or living environment in a future South Lake Union under any of the proposed alternatives.

78

**DESIGN AND DEVELOPMENT CHOICES ARE NOT FORTHCOMING IN THE DEIS:**

The failure of the DEIS Alternatives to provide future affordable land to encourage development at a scale that allows for active and ground related development is a major reason that the DEIS has failed. The negative impacts related to the creation of a 8am to 5pm office park in South Lake Union without any incentives for affordable ground related people active retail and affordable housing enterprises near the shores of Lake Union will miss the only opportunity to actually provide a vibrant and attractive future for this neighborhood.

79



One of the goals missing from any of the Alternatives is the creation of affordable spaces for small retail and tourist related enterprises to complement the public spaces already started to develop along the shoreline of Lake Union. If the planning of South Lake Union neglects the opportunity to create a walkable community with public services and retail, open space and active street level vibrant magnets at both the south end of the community along the lake front and at north end of the community it will miss a rare and possibly one time opportunity to create a truly welcoming and vibrant neighborhood. The plan of having designated Terry Avenue as a green and walkable passage north to south in the community will have little impact on creating a lively and vibrant neighborhood in the future without the creation of retail magnets at both north and south ends of the community.

80

In the DEIS 3.14.4 the statement is made:

**“Design features could be incorporated into potential development in the South Lake Union Neighborhood that would help reduce criminal activity and calls for police service, including orienting buildings towards the sidewalk and public spaces, providing connections between buildings, and providing adequate lighting and visibility “**

81

This implies that the public safety will be improved on the street by placing people underground in tunnels between buildings to make all the walkable areas of the community under the control of private development interests. This is a terrible approach to development and a very poor approach method to protecting the public safety in a planned “NO MAN’S LAND” currently on the table with the proposed DEIS Alternatives.

**The Draft EIS is using the most aggressive methodology to come up with the most optimistic conclusions.**

82

I am re-submitting my December 16, 2008 scoping comments (which have not been responded to in the DEIS) together with these additional comments for inclusion in the responses to the DEIS the April 11<sup>th</sup> deadline.

83

**Thank you,  
Brian Ramey**

Comments by Don Bennett, member of LUOA Board of Directors

The Draft EIS for Public Services misrepresents the statistics. For the Fire Stations listed as covering South Lake Union. (Figure 3.14-3) The incident numbers for 2004 thru 2008 (Stations 2 & 8) show a 10% increase followed by a one year decrease in 2009. It looks like 2009 is an anomaly and there is no reason to expect that it is representative. Additionally, all the figures listed relate to all calls for the fire stations and do not break out the results for calls to South Lake Union. As South Lake Union is at the extreme end of the coverage districts for these three stations it would make sense to guess that a majority of the failure to meet the time expectations would be in the South Lake Union neighborhood.

84

With regard to Police services there is no breakout of calls to South Lake Union. There is the additional noted problem that due to budget problems the SPD is not staffed to current expectations. All of this is without consideration of the additional problem of responding to problems on the 30th or 40th floor of a high-rise.

85

As a recreational sailor on Lake Union, there is a large dead air space on the lake for the AGC Building which is only 10 stories high. I hate to think of what a number of 30 to 40 story buildings of indeterminate floorplate along Mercer would do to this traditional use of Lake Union.

86

Comments by Kevin McCarthy, member of LUOA Board of Directors

This study uses the most aggressive methodologies to come up with the most optimistic conclusions. The EIS states the wildlife in this study is likely limited to species adapted to urban areas and birds migrating through the study area. That is incorrect. It further states that the Mercer Valley focus area wildlife is likely limited to highly urbanized species and that this proposal will not directly result in an enhanced or planned animal habitat. This is incorrect. I'm very familiar with the blue herons, wood ducks and freshwater turtles that reside in the south end of Lake Union. And I can tell you for sure that 300-foot towers rimming Westlake as well as Valley would create a permanent shadow zone in that area and my daughter and I would not get to enjoy freshwater turtles sunning when there is no sun.

87

The EIS states that for affordable housing, from 2004 to 2009, the housing unit growth for people making 0 to 80 percent of the median income range grew at 19 percent, as opposed to the City's existing goal of 37 percent. That means we're already failing by 50 percent to the affordable housing goals that we're trying to hit. And by upzoning this land, it's going to be so expensive that any affordable housing dollars that come into the South Lake Union area will not end up spent in this area. So it is my contention that affordable housing will not happen in this area because the price of land will go up so high, due to taking land that is currently 85 feet and moving it to 300 feet.

88

### 3.4 Plants and Animals

Even with the inadequate one day shadow studies there are large impacts to the newly restored natural habitat areas in Lake Union Park. Located in the southwest portion of the Lake, the natural shoreline is intended to aid in the restoration of fish and fowl populations in the Lake and to those transiting the area.

89

The one day figures do not measure the length and duration of the shadows over the lake and shoreline so there is no way to see if there is any degradation or mitigation(s) needed.

Further study is needed, especially in the Dexter and Fairview areas, of the impact of shadows on plant life and its supporting role in restoring water quality for wild life and people.

Page 3.4-7

"During the fall migration ... would experience barrier a few minutes earlier ... Alternatives 1-3 are in-fill do not extend downtown west or east... .

90

Alternatives 1 and 2 excessive heights may cause the diversion of the bird flight paths into the take off lanes of the FAR 77 area. Since this is a critical time in flight and a bird strike could easily cause the loss of power thus endangering the plane's crew and passengers and if full power is lost people on the ground could lose their life through impact and/or burning of aviation fuel .



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Date: March 8, 2011

# Memorandum

**To:** Lorie Groth, Lake Union Opportunity Alliance  
**cc:** Michael Carroll, CFA Consultants  
**From:** Christopher Ferrell, CFA Consultants  
**Reference #:** P11001  
**Subject:** Preliminary Findings from the Peer Review of the South Lake Union EIS

The following are findings from our review of the transportation sections of the South Lake Union Draft Environmental Impact Statement (EIS). These findings should be considered preliminary since they are based on a brief review of this document and would require further investigations to verify and elaborate upon. As such, the discussion below is intended to provide the Lake Union Opportunity Alliance with insights regarding where they may want to seek additional information from the City of Seattle and the EIS analysts.

## Project Background

According to the Draft EIS, "...the South Lake Union neighborhood is located in the center of the City of Seattle, immediately north of Downtown, and adjoining the Uptown and Capitol Hill areas to the west and east, respectively," and is roughly 340 acres in area. The Draft EIS considers four alternatives for increasing the height and density of the neighborhood with Alternatives 1, 2 and 3 representing a range of potential height increases. Alternative 4 would retain the existing zoning designations and is referred to as the no-action alternative.

It is our understanding that the South Lake Union project will result in significant impacts to study corridor traffic operations, freight, bicycle and pedestrian mobility, transit load factors, and parking. A series of mitigation measures are also proposed to reduce these impacts including limited roadway capacity enhancements. However, the majority of mitigations are focused on improving the bicycle, pedestrian and transit environments in the study neighborhood.

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## Preliminary Findings

The following preliminary findings were identified based on a review of the transportation sections of the Draft EIS:

- 1) *Auto Trip Generation<sup>1</sup> for the Proposed Projects*: To determine if the number of trips the EIS estimates the zoning changes will produce is reasonable, the amount of development considered under Alternative 1 and the number of trips the Draft EIS estimates were compared.

Alternative 1, the most ambitious of the three alternatives studied, would increase the number of employees by 57.5 percent and the number of dwelling units by 82.6 percent, over what current zoning would allow (the “No Action” alternative). Based on the ITE trip generation estimates provided in Appendix E of the Draft EIS, the number of daily total trips will increase from 220,539 for the No Action alternative to 283,594 with Alternative 1—an increase of 28.6 percent.

It is noted that a 29 percent increase in trips is not proportionate to the increase in employment or residential development. This is because the ITE trip generation calculations are not linear. In effect, the rate of trip generation falls as projects achieve a higher density. Therefore, the fact that the increase in the number of trips is proportionally lower than the increase in development is not *necessarily* a “warning flag” and may be in line with expectations. Short of a more detailed independent trip generation analysis to check the assumptions and estimates produced by the Draft EIS traffic engineers/planners, this part of the Draft EIS analysis appears reasonable.

However, the Draft EIS also recommended a series of trip generation estimates based on the trip reduction effects of a series of mitigations that could be implemented in concert with the development anticipated in all three alternatives. These mitigations are described in section 3.13.6 of the Draft EIS, and contemplate the benefits of a series of improvements to the transit, bicycle and pedestrian environments of the South Lake Union neighborhood.

The Draft EIS estimates that this package of mitigations will reduce the number of daily auto trips (different from total trips, as discussed above) for Alternative 1 from 136,973 to 108,207. This is compared to the total number of auto trips estimated for the No Action alternative of 108,946. Essentially, the Draft EIS analysts suggest that these mitigations will reduce the number of auto trips in the most intense development alternative to levels slightly below those estimated for the No Action alternative—this despite the 58 percent increase in jobs and 83 percent increase in dwelling units. This substantial reduction in the number of auto trips is achieved through the benefits of the proposed mitigations, which are assumed to effectively “shift” people from using cars to riding transit, bicycles

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<sup>1</sup> The term, “trip generation” is used by traffic engineers and transportation planners to describe how many trips go to and from an existing or proposed development. Trip generation is typically estimated based on surveys of existing, similar developments. The Institute of Transportation Engineers (ITE) publishes the most widely-used report for these purposes, called the Trip Generation report. Engineers and planners will typically take trip generation rates from this report and then use these as multipliers to estimate the trip generation for the study project. Therefore, in the case of a proposed 30-unit apartment building, the analyst will look up the “per dwelling unit” trip generation rate for apartment buildings and will multiply this rate by 30 (the number of units in the proposed project).

or walking. These mode shifts were estimated using a new transportation analysis tool, known as the MXD model. This model is discussed below.

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- 2) *Estimating Mode Shift*: The MXD model provides the basis for the mode shift estimates discussed above. This model is very new and is based on recent and (as far as we are aware) untested research. We have a great deal of respect for the people who developed this model and think this is valuable and much-needed research, but this may very well be the first practical application of it to a planning study, so some degree of caution is warranted.

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The mode shift estimates produced by the MXD model seem somewhat optimistic (as discussed above). One possible explanation for this may be found in the validation and calibration (i.e., adjustment) processes for the model. While there are many similarities between cities across the country in terms of the choices people make when traveling, there are also important differences based on differences in urban form, transportation supply, local economic conditions, and other factors. Therefore, all travel estimation models need to be calibrated for local conditions. However, while our review of Appendix E-4 revealed a validation process—wherein the model’s outputs are compared to real-world data to determine the degree to which the model produces data that are accurate representations of the real world—our review of the Draft EIS did not reveal any calibration processes that would make adjustments to the model to make it appropriate for use in Seattle’s urban environment.

Furthermore, this validation process appears to have shortcomings. For validating the model, the Draft EIS analysts used data from 16 local sites and found that the MXD model did a better job of predicting trip generation than the industry standard, the Institute of Transportation Engineers (ITE) Trip Generation report. Based on our preliminary review, this validation approach may be inappropriate. The ITE report is notorious within the transportation field for its somewhat weak statistical basis, and it is based primarily on suburban case studies. These suburban cases are obviously not the right comparisons for urban Seattle.<sup>2</sup> Therefore, the analysts may not be using the appropriate basis for comparison to show that the MXD model is accurately predicting the mode share/split of the proposed EIS alternatives.

Furthermore, the MXD model predicts mode share while the ITE report provides the methods to predict trip generation (auto trips only)—not mode share. Therefore, to show that the MXD model is a reliable and accurate predictor of mode share for local conditions, the best comparison would be between the model’s estimates and the observed trips by mode (mode share) of the 16 validation sites. The description of the validation process for the MXD model to local conditions in Appendix E-1 did not clearly state whether the model’s outputs were compared to observed trips by mode or

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<sup>2</sup> It should be noted that the EIS analysts applied a series of adjustments to the ITE rates (estimating so-called “internal” trips to account for walking and bicycle trips), and therefore, they appear to have used the best ITE methods available.

simply a count of total trips.

Finally, the statistics used to validate the model appear to be inadequate to the task. Appendix E-4 reports that the Root Mean Squared Error (RMSE) and Pseudo R-Square statistics for the ITE and the MXD methods were compared. These statistics provide so-called "goodness of fit" measures of the discrepancy (difference) between the values produced by the model and those observed in the real-world. However, if relying on these measures alone, it is possible that the model will have a strong goodness of fit score, but still consistently over- or under-predict the values being modeled. In other words, the MXD model may be giving low trip generation values for automobiles while the ITE method gives higher values, but since the MXD model provides values that are closer to observed values overall, its goodness of fit scores are better than ITE. Ideally, the Draft EIS analysts would have employed additional statistical measures that could have illuminated these aspects of the models' performance (e.g., t-statistics).

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April 11, 2011

James Holmes  
Senior Urban Planner  
City of Seattle Department of Planning and Development  
700 Fifth Avenue, Suite 2000  
Seattle, WA 98124

Jim.Holmes@seattle.gov

Re: DEIS for South Lake Union Height and Density Alternatives.

Dear Mr. Holmes:

This office represents Lake Union Opportunity Alliance (LUOA), a local coalition of residents, business owners and interested persons concerned with the future of the South Lake Union community.

My client has asked me to review and provide comments on the DEIS for South Lake Union Height and Density Alternatives (hereinafter "the DEIS"). After review, it is apparent that the DEIS is inadequate from multiple standpoints, which are described herein. Because these deficiencies are so serious, we ask that the DEIS be rewritten and recirculated before a final environmental impact statement ("the FEIS") is prepared. Our comments follow.

## I. FAILURE TO PROVIDE A STATEMENT OF NEED.

The DEIS states that the Seattle Comprehensive Plan establishes that the South Lake Union neighborhood should support a concentration of housing and employment. Page 2-1. The South Lake Union neighborhood already contains a concentration of housing and employment and there is no documentation as to why the current zoning, with accompanying densities and heights, is insufficient to meet needs of the local community and the Comprehensive Plan.

Further, as the "Planning Context" discussion at Section 2.2 of the DEIS indicates, growth targets have been recently established for the planning horizon out to

2031 by King County and its cities. However, this discussion also makes clear that these overall growth targets have not been incorporated into the City of Seattle Comprehensive Plan, nor have the growth targets been allocated to the various neighborhoods within the City. That process will take place in 2014.

The DEIS states that it gives the City "an early opportunity" to consider how these alternatives fit into the future comprehensive plan update. Page 2-7. As the footnote at page 2-8 indicates the city "has not yet identified specific 2031 targets for neighborhoods within the City" because that would not be done until 2014. The DEIS does not explain why planning for the South Lake Union neighborhood should be accelerated before the planning for the rest of the City's neighborhoods. The assumption that the same percentage of distribution of residences and employment will be applied to the allocation process in 2014 is not an assumption that can be made absent a City Council directive and decision. One of the key tenets of the Growth Management Act is to have coordinated planning, and to take account of all alternatives for the distribution of growth. The acceleration of analysis and adoption of development regulations for the South Lake Union Neighborhood is accordingly not consistent with GMA policies and the City should cease further analysis of the subject. The South Lake Union Neighborhood should be considered for additional growth based on 2031 populations and employment goals only at the time the rest of the city is also analyzed.

Under SEPA it is far more appropriate to examine the distribution of growth throughout the entire city, not a single location like South Lake Union. If the City is determined to pursue a process inconsistent with the GMA, the DEIS should be rewritten and redistributed for comment to examine growth issues on a citywide basis.

Based upon the foregoing, an additional alternative should be included within the DEIS. The DEIS should include an analysis of the deferral of planning for South Lake Union height and density alternatives until planning can proceed for the entire city in 2014. Alternative analysis must include distributing a portion of the new housing and employment into other urban villages and other city neighborhoods, especially for 2031,

Analysis is also required on current economic conditions and the corresponding effect on the need for additional housing and employment. It is widely known that housing markets continue in distress and the demand for additional housing has dropped substantially. The same is true for commercial real estate. The foregoing analysis should consider current commercial and office space vacancy rates in downtown Seattle and other neighborhoods. Analysis is also required for the number of permitted or proposed, but unbuilt, office, commercial and residential projects within the City that have been delayed or deferred due to the present recession. The revised DEIS, or FEIS, should provide analysis as to whether those deferred or delayed projects are able to absorb demands for new office, commercial and residential capacity without

the need for an increase in South Lake Union density and height.

In light of the foregoing issues, analysis should be made as to whether the South Lake Union Neighborhood, with new heights and densities, will in fact mean that growth in other urban villages will be stifled by growth concentration in South Lake Union.

The foregoing leads to additional questions that must be answered in the final EIS:

\*Explain whether the City is meeting its 20 year projections (2024) for housing and employment goals.

\*What factors or adopted policies indicate the need for more housing and employment in this area?

\*Is the City failing to meet its housing and employment goals and if so, are all areas of the City assuming equal portion?

\*List the other Urban Center Neighborhoods in the city and what percentage these neighborhoods would assume as a part of either 2024 or 2031 goals.

## II. AESTHETICS.

Most viewscape scenarios provide the "bird's eye" view and views from Gas Works Park. However, essentially bird's eye views are not seen by anyone but birds. The views from Gas Works are also seen by only a few persons. The DEIS is completely negligent for not providing perspective from areas south of the South Lake Union neighborhood. For example, there are no perspectives for view losses from downtown or Belltown, and only a few from the west side of Capitol Hill. Thousands of residents and office occupants have views from these areas over the South Lake Union Neighborhood to Lake Union itself. All of these views would be affected by density and height modifications for South Lake Union. These views need to be analyzed and carefully considered.

The analysis also does not include proposed projects to be built in the downtown south of Denny Way and the ability of these projects to absorb growth. An analysis needs to be made of the impacts on viewscales from these projects.

The City's analysis seems to assume that the terms of SEPA policies under SMC 25.05.675.P limit the viewpoints that should be considered. However, as this is an area-wide zoning modification, and not an action on a specific private project, these

limitations do not apply. This is a serious legal error that will require the DPD to redraft the DEIS and recirculate it.

Further, the analysis completely fails to take account of the terms of the Shorelines Management Act (SMA), RCW ch. 90.58; in particular RCW 90.58.320, which establishes height limits respecting permits:

No permit shall be issued pursuant to this chapter for any new or expanded building or structure of more than thirty-five feet above average grade level on shorelines of the state that will obstruct the view of a substantial number of residences on areas adjoining such shorelines except where a master program does not prohibit the same and then only when overriding considerations of the public interest will be served.

It is obvious that the higher buildings that are found in some of the alternatives will block views of many residents. It is important to note here that the location of the residences from which views may be blocked is not limited to properties within the shoreline area. The SMA also requires that these policies be applied to lands adjacent to the shoreline zone to be consistent with SMA policies:

All state agencies, counties, and public and municipal corporations shall review administrative and management policies, regulations, plans, and ordinances relative to lands under their respective jurisdictions adjacent to the shorelines of the state so as to achieve a use policy on said land consistent with the policy of this chapter, the guidelines, and the master programs for the shorelines of the state. The department may develop recommendations for land use control for such lands. Local governments shall, in developing use regulations for such areas, take into consideration any recommendations developed by the department as well as any other state agencies or units of local government.

RCW 90.58.340 (emphasis supplied). As noted above, the SMA establishes a strong policy for protection of visual access to the water/shoreline areas and for protection of views, especially from residential areas. Views of Lake Union are of great value in Seattle and the DEIS fails to give complete analysis of these impacts. Much of the development proposed by the current plan is achieved by permitting greater height either within or adjacent to the two hundred foot shoreline zone.

Analysis should be made of any residential or commercial properties that will have their view of Lake Union impaired or impacted by these zoning alternatives. For example, views are likely to be impacted as far south as Lenora or even areas further south in the downtown core. The areas affected should be shown on a map or maps, together with

the degree of impacted views. This will require a significant expansion of the view points and simulations stated on page 3.10-40 of the DEIS.

In summary, the visual and aesthetic analysis is so deficient as to require a redrafting of the DEIS, and recirculation for comments, prior to proceeding to the preparation of the FEIS.

### III. TRANSPORTATION ISSUES.

The transportation section is deficient in several respects.

First, there is only minimal discussion of the impacts of the construction of the Bored Tunnel on the South Lake Union neighborhood. Recent analysis has indicated that because of likely tolls for vehicular use of the Bored Tunnel, and the lack of intermediate downtown access, a significant portion of the current traffic on the SR 99 Viaduct will use downtown Seattle streets. This data is also included in the Supplemental DEIS for the Bored Tunnel project. "The issues, left unaddressed, will impact accessibility to and the character of the Center City, particularly in the vicinity of Pioneer Square and the Seattle Center/South Lake Union areas," says a briefing paper presented to the City Council on January 25, 2011 by Nelson/Nygaard (emphasis supplied). These impacts may significantly impact background traffic on streets and intersections in the South Lake Union area. The findings of this study need to be reviewed and incorporated into the transportation analysis for the DEIS.

Second, the DEIS appears to assume that peak trip generation will be heavily affected by non-auto alternatives, mostly including bike/pedestrian/internal trips. See DEIS at page 3.13-2. The justification for these conclusions needs to be disclosed and analyzed. Page 3.13-48 states that the project team "use an innovative trip generation analysis technique" known as the MDX model. Because the MDX model is new, with little backup support, the DEIS should provide a more traditional form of traffic analysis by trip generation rates as used in ITE Manuals. There are indications in the DEIS that socioeconomic conditions suggest traditional trip generation analysis is questionable, but those conditions need to be identified in detail.

Any analysis of heavy dependence on non-auto trips needs to be supported by the present circumstances. What are the percentages of non-auto trips in the South Lake Union Neighborhood at the present time? Do they come anywhere close to the percentages found in the DEIS? As to transit, an analysis needs to be made of the ridership on the Seattle Street Car lines in the community and how they compare with projections. Similar analysis needs to be made for current transit usage; how will the development of the foregoing alternatives change the current trip patterns?

Third, an analysis needs to be made as to the ability of the City or private sources to fund the mitigation measures proposed. The GMA requires that planning for capital improvements should proceed at the same time as land use planning. Local governments are currently in budget crises and an explanation needs to be made as to how each of the transportation mitigation measures will actually be funded and built. For example, new bike facilities for the Mercer project have been deleted; how many more of the suggested facilities will realistically be built by 2024 or 2031?

Fourth, the future estimates for parking usage are provided, but lack background data and have serious deficiencies in analysis. Parking utilization is based on daytime hours only; no analysis is provided for evening hours. Analysis of evening parking is critical as restaurant/bar and other evening uses develop and as visitors to residential uses attempt to find street parking. Current analysis of parking conditions suggests that on-street parking is now fully utilized during the evening hours (see Page 3.13-21). More residential and commercial development will result in increased evening parking demand which must be analyzed and considered.

Fifth, parking analysis needs to be provided for all portions of the subarea, not just those in the southerly portion of the South Lake Union neighborhood, i.e. the area south of Mercer. See pages 3.13-7.

Sixth, in addition, there needs to be an analysis of on-street parking for the built-out periods in 2024 and 2031, with attention to parking supply. Special attention needs to be given to the effect that the buildout of transportation facilities will have on parking supply during the study period, i.e. how many parking spaces will be eliminated by street, transit and bike improvements.

Seventh, the note on page 3.13-1 states that there may be "significant short-term parking impacts as individual projects in South Lake Union build out." Then the footnote explains that parking prices will "adjust to meet demand and travelers will shift to other modes, thus reducing the demand for parking." There needs to be analysis and support for this overly optimistic prediction. Short term visitors to residences, offices, restaurant/bar uses and other commercial uses are unlikely to switch to other modes.

#### IV. OPEN SPACE AND RECREATION.

This section of the DEIS discusses the impact of the density and height on park and open space resources in the area. As with other sections, there are major errors and failure to analyze critical subjects.

First, at page 3.16-4, a table is provided to compare amounts of open space to accommodate the 2024 Household and Jobs goals. However, the plan is intended to

address the 2031 population predictions. Figures must be provided to measure the adequacy of existing open space and recreation area for 2031 growth figures. Further, more detail is necessary to address those areas of the neighborhood that are not meeting identified goals.

Second, while there is analysis of open space goals, there is no analysis of recreation areas. Detail needs to be provided as to recreation resources and whether they will be adequate for the 2031 population estimates.

Third, many of the supposed existing parks and open space in the "South Lake Union vicinity" described on Table 3.16-1 are well removed from the South Lake Union area. For example, Volunteer Park and Anderson Park are on Capitol Hill and separated by distance and barriers (I-5) from South Lake Union. Park areas should only be listed if they are accessible by walking from the South Lake Union Neighborhood.

Fourth, many of the park mitigation strategies (page 3.16-9/10) seem unrealistic. For example, #1 suggests use of tax revenues to fund park facilities. This funding would require changes in statutory authority. Mitigation through the capital facilities planning (#2) requires that the City prioritize South Lake Union, but analysis must be provided as to whether funding for such facilities will be available during the current budget crises. Item #3 refers to providing facilities as a part of new development, but analysis is necessary to assure that such facilities are not only public in name, but inviting to the public, not facilities such as interior courtyards useful only to building tenants or retailers. Again, capital facilities planning must accompany land use plans under GMA.

Fifth, page 3.16-5 states that the North Downtown areas requires eight additional acres of parks and open space to meet standards by 2024. What will the requirements be by the planning period set forth in the DEIS of 2024 or 2031? Further, given budget restraints, will eight acres of new parks actually be built in the area to meet needs?

## V. CAPITAL FACILITIES.

The DEIS identifies deficiencies in sewer capacity within the South Lake Union Neighborhood. DEIS at 3.15-7. However, there are blithe assumptions that these problems will be resolved by the individual developers of new projects. *Id.* However, there is no basis on which such individual developers will replace or repair system wide facilities. GMA requires at RCW 36.70A.070(3) and (4) that capital facilities and utility strategies be a part of comprehensive planning. These also include plans for financing such necessary improvements. This section of the DEIS requires thorough analysis of the impacts on utilities, what improvements may be required and how such facilities will be funded.

VI. ALTERNATIVES.

Alternatives are the key element of SEPA decision making and all reasonable alternatives must be considered in the EIS. Agency analysis must be open-minded and public proposals in particular should be described in terms of objectives rather than preferred courses of action. This is especially true for a non-project action such as the adoption of sub-area plans such as that for the South Lake Union Neighborhood. Reasonable alternatives are those that approximate the proposal's objectives at a "lower environmental cost or decreased level of environmental degradation." WAC 197-1-440(5)(b). In the present DEIS, alternatives are not adequately considered for the reasons stated below.

First, the alternative analysis is deficient for failure to include a downzone of the subject area. A reduction in height and density must be considered, especially where it meets goals for preservation of views to Lake Union.

Second, The analysis is also deficient because it does not include the alternative of distributing new growth to other locations within the City.

Third, an additional alternative for review purposes is to defer any decision to modify the height and density standards in the South Lake Union Neighborhood until a comprehensive and coordinated review can be made of all Seattle neighborhoods. An explanation needs to be provided of the costs and impacts of deferring South Lake Union decisions.

In conclusion, this comment letter has shown that the DEIS is deficient in several areas. In addition, accelerating consideration of 2031 growth goals in the South Lake Union Neighborhood ahead of other areas of the City violates important goals and policies of the GMA. As such, the City is better advised to defer further effort and expenditure until it undertakes planning for the entire city, as scheduled for 2014. If the City is intent on proceeding on this dubious course of action, the DEIS should be completely rewritten and recirculated for comment to incorporate the comments found herein.

Thank you for this opportunity to comment on this DEIS. Please send me a copy of the next EIS prepared by the City.

Sincerely yours,

ARAMBURU & EUSTIS, LLP



J. Richard Aramburu

**Holmes, Jim**

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**From:** Carol  
**Sent:** Monday, April 11, 2011 11:29 AM  
**To:** Holmes, Jim; DPD\_Planning\_Division  
**Cc:** Rick Aramburu  
**Subject:** South Lake Union EIS  
**Attachments:** LUOA SLU DEIS Comment Letter 4-11-11.pdf

Attached are comments on the SLU Draft EIS made on behalf of the Lake Union Opportunity Alliance. If you have any questions for LUOA or for Mr. Aramburu, please contact this office.

Thank you,  
Carol Cohoe  
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This message may be protected by the attorney-client and/or work product privilege. If you received this message in error please notify us and destroy the message. Bcctc CgJp. Thank you.

### **1. Summary**

The summary section of the EIS needs to be more informative, quantitative, and objective in order for the general public to understand the impacts in a timely manner. The complete EIS is justifiably a large and thorough document, but it must be recognized that is also for the citizens of Seattle who volunteer their time and effort to help shape their neighborhoods.

Currently the summary reads as vague and even subjective. For example: page 1-18 states in reference to Alternative 1, "Building heights increase *slightly* in the *block* north of Mercer." First, a transition from 240' to 300' in a zone currently designated as 40' is not 'slight.' Second, 'block' should be pluralized, as there is more than one block north of Mercer. Third, there are several blocks (in fact, 24+) that do not step down at all between John St. and Galer St., extending substantially north (and south) of Mercer. People could interpret this as not only subjective, but misleading.

There are several more examples like this – many of them noted in John Pehrson's and others' comments. I would ask that the entire summary be revisited in this manner with the intention of being informative and meaningful to the public.

### **2.3 Proposed Action Alternatives**

Table 2-3 indicates that an office tower with a floor area of 24,000sf will be awarded to a developer who owns 22,000sf of property. It is also characterized that this oversized floor plate will somehow be 'set back' from its podium base. It is understandable that such issues will be remedied during the zoning process, but what is not clear is how the assumptions for density capacity have been made throughout the body of the EIS. Please clarify.

### **3.8 Land Use**

#### **Mixed-Use Commercial Areas**

It states on 3.8-11 that "All of the EIS Alternatives would increase residential and employment density within the South Lake Union Urban Center." While technically this is true (even for Alt 4), it is as general of a statement as saying "the neighborhood will grow." It should be noted that it is likely that Alts 1 & 2 will tip the delicate mixed-use balance into predominantly office use. Property values are a bargain compared to the downtown office core, but relatively expensive by Seattle neighborhood standards. *Incentivizing* office use will exasperate that condition. The reason the neighborhood has not already gone completely office is because the larger corporations and institutions are having a difficult time squeezing into the current zoning envelop. Numerous variances and exceptions have been made for Amazon and UWIII, but not for housing. It is then a flawed argument to imply (as on 3.8-13) that Alts 1 & 2 will "promote a variety of housing types." Rather, there will be a small amount of high-end residential, which will force a trace amount of low-income housing in what will be an unwelcomed and unsupported environment (i.e. no schools or services).

#### **Affordable Low Income Households**

The myth needs to be put to rest that high-rise residential buildings will naturally result in more affordable housing. It is rare if it ever happens at all without government subsidies, such as “The Projects” throughout the nation. The concrete and steel construction otherwise puts the cost out of reach, no matter how many units are stacked on each other. The false argument has been heard numerous times around this public process by laypeople and city officials alike. The DPD should educate this conversation when appropriate, and the EIS would be a good place to begin.

### **Transportation**

In cities with rapid transit, true urban centers naturally develop at the transit stops. This is how residents of Chicago or New York, for example, can confidently forgo owning a car. They can quickly visit places of work, eateries and culture within a few minutes walk of a transit station that did not get stuck in traffic or make stops every quarter-mile. Page 3.8-20 states that “There are no bus rapid transit or light rail lines planned in the South Lake Union neighborhood,” yet Alt 1 & 2 show Manhattan-like neighborhood densities. Furthermore, with no rail planned for the 520 bridge (or the 99 tunnel), it is hard to believe the city will change course. The types of businesses moving into SLU have strong ties with Bellevue and Redmond. To what degree that ‘everyone who works here will live here’ is unsubstantiated, and the outcomes of the traffic studies are not credible.

### **3.10 Aesthetics**

The computer-generated models of the architecture are inaccurate. It is hard to determine all of the mistakes due to the poor selection of views that hardly inform the reader of the realities of the densities (which should be remedied for the EIS), but here are a few:

**Figure 3.10-2 Full Build-Out:** The ‘two tower per block’ does not appear to its full manifestation south of the Mercer blocks; the podiums of the Mercer blocks are wrong; the Mercer towers are not set back from Valley – does this reflect a policy of which we are not aware?

**Figure 3.10-4 Full Build-Out:** Either the Mercer block podiums are wrong, or it is showing two towers per block – one office and one residential.

**Figure 3.10-6 Full Build-Out:** Same mistake as above.

**Figure 3.10-8 Full Build-Out:** Not sure what is being shown at Mercer blocks. If it is the current incentive, the upper setbacks do not appear correct. Is it the Lab benefit assumption? It is certainly not the 40’ zoning. Please clarify or correct.

**For all street-level views:** Please add scale figures and an auto in order for the layperson to understand the scale at all street-level views.

**Figure 3.10-12:** This is both inaccurate and misleading. The podium heights north of Mercer are 85’ – taller than the existing buildings shown south of Mercer, so it is therefore inaccurate. It is also misleading that the towers do not appear in this view because they are not set back from Valley in this model, but that is inconsistent with the UDF. Please include a Valley view, and/or explain this new setback policy.

**Figure 3.10-13:** A 1-story podium is shown on the right, even though a 30’ is allowed. That is an unlikely depiction.

**Figure 3.10-14:** The podium for the building on the right is identical to that in 3.10-11 even though the plan indicates there would be a 20’ height difference. Which image, if

Comments by Jim Goodspeed, member of LUOA Board of Directors

any, is accurate? If it claims to be a portion of the block that remains with current zoning, it is shown lower than that of 3.10-20.

**Figure 3.10-15:** This is an inaccurate and misleading depiction showing Alt 1 as being less dense at the waterfront than Alt 2. Now, without explanation in the text, the towers are on Mercer instead of on Valley as in 3.10-12. It is also inaccurate in that there are 2 towers per block – alternating an 85' office with a 160' residential.

**Figure 3.10-18:** Once again, showing inaccurately 2 towers per block north of Mercer.

**Figure 3.10-21:** Same comment as 3.10-8. Please explain how the forms were derived north of Mercer.

**Figure 3.10-25:** How was the form on the left derived? The tall portion appears to not use incentive zoning as it is similar in height to the Rollins building. The low portion appears to be part of the incentive form, but it seems unlikely that the corresponding 10,500sf tower would be completely out of view from this vantage point. It is also inconsistent with what is shown in the shadow model, **Figure 29, Appendix D**.

**Figure 3.10-27:** The new building appears to be using existing zoning where 400' is allowed. Why? This does not reflect the Alt 1 proposed zoning across from Mirabella.

**Figure 3.10-49:** The new building does not utilize its 125' allowable height. Why?

**Appendix D, Figure 1:** In this view, the Mercer towers have been moved from where they were depicted in the Mercer corridor view 3.10-12. In each case, they have been located in the image to have the least impact as possible.

**Appendix D, Figure 2:** Inaccurate.

**Appendix D, Figure 3:** Inaccurate.

**Appendix D, Figure 4:** ? (See comment on **Figure 3.10-25**)

**Appendix D, Figure 20:** This shows Alt 4 as having taller buildings in the Fred Hutch area than Alt 3, but the zoning heights for each Alt is the same. This mistake carries into the shadow depictions for **Figures 43 and 44**, unfairly showing that Alt 4 casts shadows farther into the water than Alt 3.

**Appendix D, Figure 25:** Perhaps the unbuilt Amazon building would show in this view. Also, 2 towers are identical in height and plan as in **Figure 26** (Alt 1 to Alt 2). One of these images would then not be a fair depiction of the zoning changes.

**Appendix D, Figure 29:** I retract my public statement that the shadows were rendered incorrectly. I see now the mistakes are in the building forms – not the shadows. Also, please put the shadow images with the body of the text – not in the appendix. This is not extra material but essential to their descriptions, and the reader should not have to flip back and forth to understand it.

It is unfortunate but understandable that the city could not afford to build physical models of the 4 alternatives. However, the city should remedy this shortfall by allowing the public access to the computer models, or at the very least, take requests for vantage points where people have concerns. The views shown are either bird's-eye or on the street. There is a large range of intermediate views that should be incorporated into the EIS to maximize the peoples' understanding of the densities.

**Transportation - DEIS 3.13:**

Table 3.13-13 of the DEIS indicates all three alternatives would bring several major arterials into failing categories for auto traffic levels - LOS scores of E and F. According to Wikipedia, these LOS Scores mean "every vehicle moves in lockstep with the vehicle in front of it... a constant traffic jam... a road for which the travel time cannot be predicted... more demand than capacity."

Maintaining the green of designated "green streets" should be an important consideration. For example, as drivers who are stuck in highly congested conditions seek to find greater capacity, the potential for traffic from Denny (LOS F) and Harrison (LOS E) to overflow onto Thomas St (an adjacent designated green street) is a likely possibility that is overlooked in the DEIS and should be studied.

As the DEIS is essentially impossible for non-city planners or engineers to decipher, LUOA commissioned Christopher Ferrell of CFA Consultants (a transportation planning and research firm) to provide some professional perspective on the DEIS Transportation section. (See attached CFAC Memo.) Based on CFAC commentary, there appear to be several points of serious concern with the DEIS Transportation study:

1. Auto Trip Generation appears to be of concern. The study expects the number of employees in SLU to increase by 58%, and the number of housing units to increase by 83% (most of which are not likely to be single occupant dwellings), while the increase in trip generation increases by a mere 29%. While this increase in trip generation may be in line with expectations, without adequate metrics to clearly validate this seemingly optimistic outcome, a more in-depth trip analysis should be conducted.
2. The ITE Model used to predict trip generation, is industry standard but is (a) based primarily on suburban case studies that may not be applicable to South Lake Union and (b) is known within the industry for weak statistical basis. In light of greater implications of the MXD Model, used to estimate mode shifts, the DEIS results seem alarmingly aggressive at best:
  - The MXD Model is new and based on untested research.
  - Appendix E-4 is unclear and may indicate the estimation model may have been calibrated using generic assumptions as opposed to those more appropriate for the urban environment of South Lake Union.
  - The validation methods used appear to have shortcomings relying on suburban case studies inappropriate for use in South Lake Union.
  - Appendix E-1 inadequately states whether any true correlation exists between the results of the MDX model, used to estimate mode share, and the ITE, used to predict trip generation.
  - The statistics used to validate the model, found in Appendix E-4 appear inadequate to the task: RMSE and Pseudo R-Square for the ITE and MDX methods may produce strong goodness of fit scores while consistently over or under estimating the underlying values being modeled.

These trip generation increases to just 29% appear are obtained by the assumed implementation of several mitigation techniques found throughout the DEIS that seem to rely heavily on "mode shifts" (presumably from single-occupant vehicles to public transportation) to identify the best-case scenario. (See Table 3.13-16 & 17.) Thus, the DEIS

Comments by Chris Gemmill (VP) and Lorie Groth (Tres), LUOA Board of Directors

actually illustrates a decrease in the trip count of Alternative 1 at full build-out to levels below what would be expected Alternative 4 with no mode shifts applied. The assumption that *"if we build tall buildings, we will get viable public transportation that people will use instead of cars"* is faulty at best for the Seattle metropolitan area considering the challenges Seattle faces delivering viable public transportation. Seattle is known across the country to be sub-standard in this area, thus it is irresponsible to gloss over this critical issue by using disparate metrics.

The proposed mitigation strategies seem optimistic, at best:

- Bicycle & Pedestrian System
  - Wider sidewalks will most certainly help, but that is very limited in scope. It seems there is an inordinately high reliance placed on the idea of car-free living in SLU. The Alterra condominium community of SLU as an example has 60 residential units with 110 parking spaces. All spaces are full and there is demand for more. It is a rare occasion during the day that there are more than 30 cars remaining in the garage and residents admittedly commute, by car, to locations as nearby as The Gates Foundation and Nordstrom.
  - Some aspects of the Bicycle Master Plan have shown, through real-world experience in SLU thus far, to carry the potential to create greater auto traffic congestion. One example, related to bike lanes on arterials, is the intersection of Dexter and Mercer. The addition of the bike lane made Dexter a 3-lane road. With 3 lanes, a left turn arrow is now required on Dexter southbound at Mercer. (Presumably northbound as well, once Mercer becomes 2-way.) Along with Roy Street as a tributary and, to a lesser degree, Valley Street, Dexter Ave N is now frequently backed up in excess of 2 blocks during non-peak times of day (10am, 1:30pm, etc.) with drivers waiting to turn left at Mercer. Additionally, lane modifications made to accommodate this same bike lane pose precarious safety concerns for both drivers and bicyclists on Dexter southbound immediately south of the Denny intersection.
- Transit Service Expansion
  - The addition of busses and bus routes is a great theory, over which the City of Seattle has no control. In practice, King County Metro has been scaling back service and increasing rates for years and they still project a shortfall in revenue of \$600M through 2013. There are admittedly no plans for Rapid Transit in SLU. The Seattle Streetcar goes virtually nowhere and does not effectively connect to any other service. In general, expansion of these systems and the addition of others is a mitigation strategy that has proven to be a failure time and time again throughout Seattle.
- Potential Mitigation Measure Implementation
  - Because the number one suggestion to fund these mitigations is the "South Lake Union Voluntary Impact Fee Program," it sounds as though there may be no way to pay for them. As noted by Donald R. Samdahl in his "Multi-Modal Impact Fees" paper:
    - "The Washington State legislature did not authorize jurisdictions to impose impact fees on modes other than roadways in the Growth Management Act. Seattle had to rely on the "volunteer agreement" provision of the State Environmental Policy Act. This provision is not as effective at raising funds uniformly as the GMA traditional impact fees. **In fact, the City of Seattle has not been as**

**Air Quality - DEIS 3.2:**

1. Ozone (O<sup>3</sup>) implications:

On page 3.2-4 the DEIS states that, in 1997, the EPA deemed the Puget Sound region a nonattainment area and in 2005, the EPA adopted more stringent ozone standards. The DEIS then goes on to state: "Based on ozone measurements over the past few years, the Puget Sound region seems to again be on the brink of becoming a nonattainment zone" but claims because ozone problems tend to be regional in nature and can be transported far from their sources that "the potential future nonattainment status for ozone would have no direct implications for any of the South Lake Union alternatives."

While ozone problems may have a regional propensity and, in the time between emission and formation, can be transported far from their sources, the DEIS seems to imply the source is ultimately irrelevant in hydrocarbon production. No mitigation strategy has been put forth, no future modeling has been done, in fact, no testing has been done at all in attempt to determine whether SLU under alternatives of increased height and density might substantially and adversely impact the region as a whole. All this, while our region is on "on the brink" of producing unacceptable levels of health-based NAAQS for ozone, with no explanation provided.

Ozone levels pose a material public health risk and not testing the environmental impacts "that could occur under worst-case conditions" for the reasons sited in the DEIS is unacceptable to the public.

2. Carbon Monoxide (CO) implications:

On page 3.2-2 the DEIS reports the area of South Lake Union to be a current "maintenance area" for CO emissions and on page 3.2-5 states "the analysis of potential air quality impacts related to the alternatives focuses on traffic and was based on consideration of ambient concentrations of [CO] that could occur under worst-case conditions near congested intersections."

The analysis is stated to have been performed at three (3) signalized intersections based on traffic levels predicted for the year 2031 at peak-hour traffic levels of service (LOS). While rationale is provided for the selection of these three intersections, it seems insufficient at best to only examine intersections along Mercer Street that are all just a few blocks from each other. As in the Transportation analysis, there is no mention of potential impacts of air quality at the proposed Republican Street exit of the deep-bore tunnel and other seemingly high impact areas like Denny/Fairview and Denny/Dexter.

Furthermore, directly due to the Transportation analysis (for the reasons sited previously in these comments), the Air Quality analysis may be substantially flawed and shortsighted in understating potential hazards to public health. If the potential flags raised in the Transportation section and a thorough traffic analysis as recommended by LUOA in these comments produce results that are even moderately less favorable, the health impacts on residents and employees of South Lake Union may be greatly compromised.

By default, the DEIS seems to be using the most aggressive methods of analysis to come to the most optimistic result. This is in direct conflict with the stated goal of the analysis in this section - that of determining what "could occur under worst-case conditions"

## Comments by Chris Gemmill, Vice President, LUOA Board of Directors

and is, again, unacceptable to the public. If the results of the transportation section are to be used in making air quality determinations, a thorough and comprehensive traffic study must be completed.

### **Full and Fair Disclosure within the DEIS:**

Prominent South Lake Union landholders have several motives in the upzoning rulings that will come to SLU following the Final EIS. While not overlooking their altruistic motives of sustainable design, et.al., a primary driving factor is certainly to maximize their return on investment. Developers, architects and others also have significant financial skin in the game. Nothing comprehensive is found in the DEIS (individual sections, appendixes, credits, etc) where disclosure has been made with respect to the contributing parties of the DEIS document. (Exception drawn to simple source citations for various charts and graphics throughout.) Who, for example, authored the Air Quality section? This is unknown to the public and is a material to the public document. In fact, certain contributors (known privately) are known to have strong business ties with prominent South Lake Union landholders, thus, conflict of interest can easily be assumed without disclosure. In an ideal world, the City would select competent and capable contributors for the EIS without these conflicts but COI is sometimes difficult to avoid. In lieu of this requirement it is my recommendation that all contributors involved in the construction of this public document be disclosed along with potential conflicts they may carry including, at a minimum, a list of prominent South Lake Union landholders and corporations with whom each have business dealings. Avoiding COI is not always necessary but transparency should be the norm!



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Date: March 8, 2011

# Memorandum

**To:** Lorie Groth, Lake Union Opportunity Alliance  
**cc:** Michael Carroll, CFA Consultants  
**From:** Christopher Ferrell, CFA Consultants  
**Reference #:** P11001  
**Subject:** Preliminary Findings from the Peer Review of the South Lake Union EIS

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The following are findings from our review of the transportation sections of the South Lake Union Draft Environmental Impact Statement (EIS). These findings should be considered preliminary since they are based on a brief review of this document and would require further investigations to verify and elaborate upon. As such, the discussion below is intended to provide the Lake Union Opportunity Alliance with insights regarding where they may want to seek additional information from the City of Seattle and the EIS analysts.

## Project Background

According to the Draft EIS, "...the South Lake Union neighborhood is located in the center of the City of Seattle, immediately north of Downtown, and adjoining the Uptown and Capitol Hill areas to the west and east, respectively," and is roughly 340 acres in area. The Draft EIS considers four alternatives for increasing the height and density of the neighborhood with Alternatives 1, 2 and 3 representing a range of potential height increases. Alternative 4 would retain the existing zoning designations and is referred to as the no-action alternative.

It is our understanding that the South Lake Union project will result in significant impacts to study corridor traffic operations, freight, bicycle and pedestrian mobility, transit load factors, and parking. A series of mitigation measures are also proposed to reduce these impacts including limited roadway capacity enhancements. However, the majority of mitigations are focused on improving the bicycle, pedestrian and transit environments in the study neighborhood.

## Preliminary Findings

The following preliminary findings were identified based on a review of the transportation sections of the Draft EIS:

**South Lake Union EIS Preliminary Peer Review Memorandum**  
March 8, 2011

- 1) *Auto Trip Generation<sup>1</sup> for the Proposed Projects*: To determine if the number of trips the EIS estimates the zoning changes will produce is reasonable, the amount of development considered under Alternative 1 and the number of trips the Draft EIS estimates were compared.

Alternative 1, the most ambitious of the three alternatives studied, would increase the number of employees by 57.5 percent and the number of dwelling units by 82.6 percent, over what current zoning would allow (the “No Action” alternative). Based on the ITE trip generation estimates provided in Appendix E of the Draft EIS, the number of daily total trips will increase from 220,539 for the No Action alternative to 283,594 with Alternative 1—an increase of 28.6 percent.

It is noted that a 29 percent increase in trips is not proportionate to the increase in employment or residential development. This is because the ITE trip generation calculations are not linear. In effect, the rate of trip generation falls as projects achieve a higher density. Therefore, the fact that the increase in the number of trips is proportionally lower than the increase in development is not *necessarily* a “warning flag” and may be in line with expectations. Short of a more detailed independent trip generation analysis to check the assumptions and estimates produced by the Draft EIS traffic engineers/planners, this part of the Draft EIS analysis appears reasonable.

However, the Draft EIS also recommended a series of trip generation estimates based on the trip reduction effects of a series of mitigations that could be implemented in concert with the development anticipated in all three alternatives. These mitigations are described in section 3.13.6 of the Draft EIS, and contemplate the benefits of a series of improvements to the transit, bicycle and pedestrian environments of the South Lake Union neighborhood.

The Draft EIS estimates that this package of mitigations will reduce the number of daily auto trips (different from total trips, as discussed above) for Alternative 1 from 136,973 to 108,207. This is compared to the total number of auto trips estimated for the No Action alternative of 108,946. Essentially, the Draft EIS analysts suggest that these mitigations will reduce the number of auto trips in the most intense development alternative to levels slightly below those estimated for the No Action alternative—this despite the 58 percent increase in jobs and 83 percent increase in dwelling units. This substantial reduction in the number of auto trips is achieved through the benefits of the proposed mitigations, which are assumed to effectively “shift” people from using cars to riding transit, bicycles

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<sup>1</sup> The term, “trip generation” is used by traffic engineers and transportation planners to describe how many trips go to and from an existing or proposed development. Trip generation is typically estimated based on surveys of existing, similar developments. The Institute of Transportation Engineers (ITE) publishes the most widely-used report for these purposes, called the Trip Generation report. Engineers and planners will typically take trip generation rates from this report and then use these as multipliers to estimate the trip generation for the study project. Therefore, in the case of a proposed 30-unit apartment building, the analyst will look up the “per dwelling unit” trip generation rate for apartment buildings and will multiply this rate by 30 (the number of units in the proposed project).

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or walking. These mode shifts were estimated using a new transportation analysis tool, known as the MXD model. This model is discussed below.

- 2) *Estimating Mode Shift*: The MXD model provides the basis for the mode shift estimates discussed above. This model is very new and is based on recent and (as far as we are aware) untested research. We have a great deal of respect for the people who developed this model and think this is valuable and much-needed research, but this may very well be the first practical application of it to a planning study, so some degree of caution is warranted.

The mode shift estimates produced by the MXD model seem somewhat optimistic (as discussed above). One possible explanation for this may be found in the validation and calibration (i.e., adjustment) processes for the model. While there are many similarities between cities across the country in terms of the choices people make when traveling, there are also important differences based on differences in urban form, transportation supply, local economic conditions, and other factors. Therefore, all travel estimation models need to be calibrated for local conditions. However, while our review of Appendix E-4 revealed a validation process—wherein the model’s outputs are compared to real-world data to determine the degree to which the model produces data that are accurate representations of the real world—our review of the Draft EIS did not reveal any calibration processes that would make adjustments to the model to make it appropriate for use in Seattle’s urban environment.

Furthermore, this validation process appears to have shortcomings. For validating the model, the Draft EIS analysts used data from 16 local sites and found that the MXD model did a better job of predicting trip generation than the industry standard, the Institute of Transportation Engineers (ITE) Trip Generation report. Based on our preliminary review, this validation approach may be inappropriate. The ITE report is notorious within the transportation field for its somewhat weak statistical basis, and it is based primarily on suburban case studies. These suburban cases are obviously not the right comparisons for urban Seattle.<sup>2</sup> Therefore, the analysts may not be using the appropriate basis for comparison to show that the MXD model is accurately predicting the mode share/split of the proposed EIS alternatives.

Furthermore, the MXD model predicts mode share while the ITE report provides the methods to predict trip generation (auto trips only)—not mode share. Therefore, to show that the MXD model is a reliable and accurate predictor of mode share for local conditions, the best comparison would be between the model’s estimates and the observed trips by mode (mode share) of the 16 validation sites. The description of the validation process for the MXD model to local conditions in Appendix E-1 did not clearly state whether the model’s outputs were compared to observed trips by mode or

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<sup>2</sup> It should be noted that the EIS analysts applied a series of adjustments to the ITE rates (estimating so-called “internal” trips to account for walking and bicycle trips), and therefore, they appear to have used the best ITE methods available.

**South Lake Union EIS Preliminary Peer Review Memorandum**  
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simply a count of total trips.

Finally, the statistics used to validate the model appear to be inadequate to the task. Appendix E-4 reports that the Root Mean Squared Error (RMSE) and Pseudo R-Square statistics for the ITE and the MXD methods were compared. These statistics provide so-called "goodness of fit" measures of the discrepancy (difference) between the values produced by the model and those observed in the real-world. However, if relying on these measures alone, it is possible that the model will have a strong goodness of fit score, but still consistently over- or under-predict the values being modeled. In other words, the MXD model may be giving low trip generation values for automobiles while the ITE method gives higher values, but since the MXD model provides values that are closer to observed values overall, its goodness of fit scores are better than ITE. Ideally, the Draft EIS analysts would have employed additional statistical measures that could have illuminated these aspects of the models' performance (e.g., t-statistics).

April 10, 2011

**Comments on SLU Rezone Draft EIS**

**Brian D. Ramey**

Thank you for this opportunity to comment.

My Name is Brian Ramey I live in the Eastlake Neighborhood of Lake Union.

**ENVIRONMENTAL IMPACTS NOT ADDRESSED:**

**SHORELINE MANAGEMENT ACT IGNORED:**

The State of Washington Shoreline's Management Act recognizes that the shorelines and the waters of the state are "among the most valuable and fragile" of the state's natural resources and the State requires that Cities recognize the importance of protecting the shoreline and urban water-bodies.

The Shoreline Management Act prohibits the shading of water bodies with new development. The allowance of tall building next to the lake and the admission that these buildings will shade the lake are clear violations of the State Law.

The DEIS states that birds and fish species dependent on the lake will be adversely impacted by the build-out. The Draft EIS fails to explain how the city will protect against the adverse Environments impacts in any Alternative to public health, the land, the vegetation and wildlife that are currently part of the Lake Union environment.

**WATER:**

Section 3.3.1 through 3.3.12

The DEIS fails to identify the baseline Combined Sewage Overflow (CSO) volumes for each of the six current outfalls into Lake Union. It further fails to indicate what the volumes frequency of CSOs will be upon full potential build-out of any Alternatives. The DEIS does not state whether any additional outfall facilities will be built to allow for additional CSO into Lake Union and what, if any, expected CSO volumes and/or frequencies would be attributable to any new outfalls under a full build-out scenario of any Alternative identified in the DEIS. No mention is made or descriptions outlined in the DEIS of any future needs for Stormwater or Sewage capital facility upgrades within the basin or required improvements to the existing system for any Alternative identified in the DEIS. The face that the Draft

EIS states that there will be unavoidable Combined Sewage and Storm-water Overflows into Lake Union in the future is unacceptable and this statement is made without any detail on the actual source of the overflows.

What are the projected volumes of sediment deposits into Lake Union as a result of any of the development Alternatives?

Please provide a quantifiable description of the Sewage and Stormwater impacts under all Alternatives.

### LIGHT AND AIR:

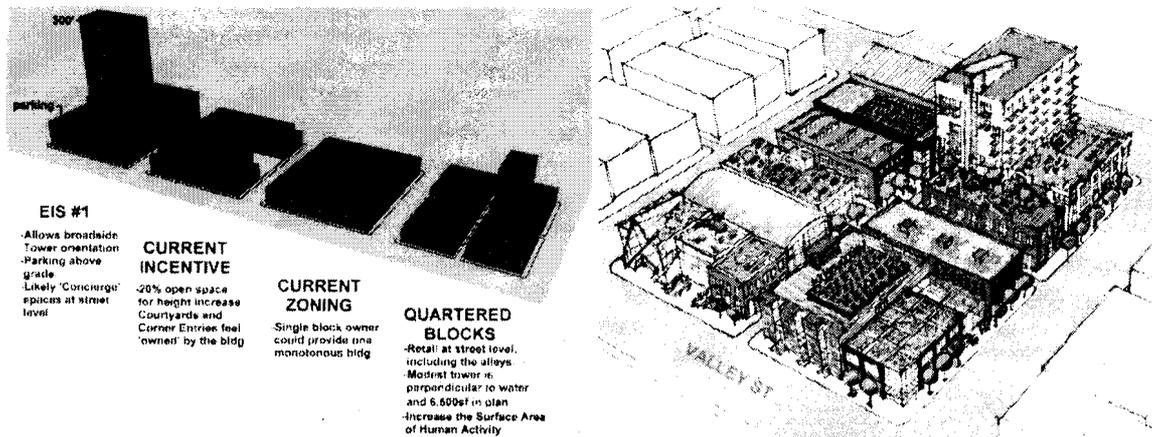
The Draft EIS fails to explain how development will be placed to prevent interference with air and water navigation in Lake Union. This includes Sea Plane and Sailboat navigation. The DEIS ignores the rights of recreational and commercial users of Lake Union for reliance on **wind currents** which provide public enjoyment of sail boat recreation and tourism. The proposed height, bulk and numbers of buildings allowed under Alternatives 1, 2, and 3 will have a major impact on the future viability of the Tuesdays Duck Dodge due to major buildings shielding natural wind currents over the lake creating dead zones where none existed before.

The creation of **Shadows** will have a major environmental impact on the **public spaces** of Denny Park, Cascade Park and Lake Union Park. No mitigating measures are proposed.

I do not believe that we are creating the incentives or controls to allow for a **vibrant** retail, recreation, or living environment in a future South Lake Union under any of the proposed alternatives.

### DESIGN AND DEVELOPMENT CHOICES ARE NOT FORTHCOMING IN THE DEIS:

The failure of the DEIS Alternatives to provide future affordable land to encourage development at a scale that allows for active and ground related development is a major reason that the DEIS has failed. The negative impacts related to the creation of a 8am to 5pm office park in South Lake Union without any incentives for affordable ground related people active retail and affordable housing enterprises near the shores of Lake Union will miss the only opportunity to actually provide a vibrant and attractive future for this neighborhood.



One of the goals missing from any of the Alternatives is the creation of affordable spaces for small retail and tourist related enterprises to complement the public spaces already started to develop along the shoreline of Lake Union. If the planning of South Lake Union neglects the opportunity to create a walkable community with public services and retail, open space and active street level vibrant magnets at both the south end of the community along the lake front and at north end of the community it will miss a rare and possibly one time opportunity to create a truly welcoming and vibrant neighborhood. The plan of having designated Terry Avenue as a green and walkable passage north to south in the community will have little impact on creating a lively and vibrant neighborhood in the future without the creation of retail magnets at both north and south ends of the community.

In the DEIS 3.14.4 the statement is made:

**“Design features could be incorporated into potential development in the South Lake Union Neighborhood that would help reduce criminal activity and calls for police service, including orienting buildings towards the sidewalk and public spaces, providing connections between buildings, and providing adequate lighting and visibility “**

This implies that the public safety will be improved on the street by placing people underground in tunnels between buildings to make all the walkable areas of the community under the control of private development interests. This is a terrible approach to development and a very poor approach method to protecting the public safety in a planned “NO MAN’S LAND” currently on the table with the proposed DEIS Alternatives.

**The Draft EIS is using the most aggressive methodology to come up with the most optimistic conclusions.**

I am re-submitting my December 16, 2008 scoping comments (which have not been responded to in the DEIS) together with these additional comments for inclusion in the responses to the DEIS the April 11<sup>th</sup> deadline.

**Thank you,  
Brian Ramey**

Ms. Diane Sugimura  
Director  
City of Seattle Department of Planning and Development  
700 Fifth Ave., Suite 1900  
P.O. Box 34019  
Seattle, WA 98124-4019

RE: South Lake Union Height and Density Draft Environmental Impact Statement (DEIS)

Dear Diane;

Leadership for Great Neighborhoods (LGN) appreciates the opportunity to comment on the DEIS. LGN is a broad-based coalition of neighborhood leaders, residents, business owners and other stakeholders. We are dedicated to affecting change and achieving the greatest possible social, economic and environmental benefits for all Seattle neighborhoods. We seek specific progress across neighborhood boundaries in the areas of smart growth, sustainable development, zoning, affordable housing, and mobility and transit.

Some of our comments do not address specific impacts in the DEIS. Rather, they suggest alternative ways of measuring, quantifying and reporting impacts of the various alternatives.

Although there is no requirement for an EIS to examine positive benefits of an action, LGN recommends identifying in the document how each of the growth alternatives can help address adopted goals for carbon reduction and for growth management through compact urban neighborhoods. A specific comment is that impacts are examined cumulatively and not per capita. If looked at via a per capita lens, the growth alternatives can be seen as the most direct means to implement growth management and address climate change at the local level. | 1

A second concern is that the DEIS did not look at economic development. You are encouraged to analyze the economic development impacts of the alternatives. There is likely a clear and distinct difference between the growth alternatives and the no-action alternative with respect to economic development. The City's SEPA ordinance requires analysis of consistency of the project with "adopted plans and policies." The City has many adopted plans and policies, including the Comprehensive Plan, which state economic development goals. As a potential model to follow, the Downtown Seattle Association has demonstrated the tax benefits of denser mixed use development in urban areas. These benefits mirror work at the national level by renowned urbanist thinker Peter Katz. | 2

LGN believes that variety in urban form is a key aspect of livability. We urge DPD to look at the impacts of a less diverse urban form and how additional height can mitigate the impacts of current zoning. Greater height enables tall, slender towers atop relatively short podiums - a building form that can provide benefits in many areas, including: | 3

- *Pedestrian Environment:* The average person on the street is aware of the podium portion of the building only, and the result is a more open feeling streetscape.
- *Footprint flexibility and open space:* When building floor space can be accommodated in tall towers, it is possible to pull back the base of the building from the property line to create wider sidewalks, plazas, or pocket parks.
- *Views:* Tall slender towers can actually have less impact on views because views are preserved between towers. In contrast, shorter, bulkier buildings tend to wall off views.
- *Shadows:* Tall buildings cast longer shadows, but compared with the shorter, bulkier alternative, the tower/podium form typically has reduced shadow impacts on the public right-of-way because the towers are set back from the property line.

3 cont

We believe these benefit considerations for all four alternatives should be more fully investigated for the FEIS.

Next, a key livability concern for LGN members is the presence of basic neighborhood necessities such as community centers, libraries and schools. This is particularly important for dense urban neighborhoods. Opportunities for funding those necessities can be made more certain with flexibility in South Lake Union zoning provisions relating to height and development capacity.

4

Under the current Incentive Zoning ordinance, a portion of the public benefit for additional height or development capacity can be used to pay for community identified needs such as community centers and libraries. Without sufficient height allowances, both Seattle and the South Lake Union neighborhood may be unable to achieve its goals.

In conclusion, we ask that the city analyze per capita impacts, economic development, urban form and how increased height can lead to neighborhood necessities in South Lake Union.

5

LGN believes that increased height and flexibility will positively benefit the region. We look forward to seeing these issues addressed in the Final Environmental Impact Statement.

Sincerely,



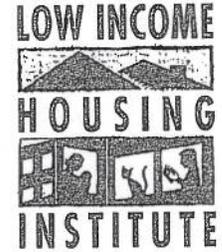
Renee A. Staton  
Chair, Neighborhood Leaders Group  
Leadership for Great Neighborhoods

Cc:

Michael McGinn, Mayor  
Richard Conlin, President, Seattle City Council

Sally Bagshaw, Seattle City Council  
Tim Burgess, Seattle City Council  
Sally Clark, Seattle City Council  
Jean Godden, Seattle City Council  
Bruce Harrell, Seattle City Council  
Nick Licata, Seattle City Council  
Mike O'Brien, Seattle City Council  
Tom Rasmussen, Seattle City Council  
Marshall Foster, Department of Planning and Development  
Jim Holmes, Department of Planning and Development

April 11, 2011



Ms. Diane Sugimura, Director
Seattle Department of Planning and Development
PO Box 94745
Seattle, WA 98124-4745

RE: Comment on South Lake Union DEIS

Dear Ms. Sugimura:

The Low Income Housing Institute (LIHI) hereby submits our comments on the South Lake Union Draft Environmental Impact Statement. LIHI is a leader in providing low-income housing in South Lake Union (SLU). Currently, LIHI housing accounts for one-third of the 568 units of nonprofit subsidized low-income housing in SLU.

LIHI owns and manages four properties that provide 189 rental units for families, low-wage workers, seniors, youth and homeless people. The Bart Harvey, Denny Park Apartments, Lakeview Apartments and Jensen Block Apartments are affordable to households making 30%, 50% and 60% of the area median income (AMI). This housing ranges in size from studios to three-bedroom units. LIHI has made a commitment to keep our housing affordable long-term, from 50 to 75 years.

We believe that as SLU continues to grow over the next 25 years that the production of low-income and affordable housing must keep pace with other residential and commercial development. The DEIS points out that the City's Comprehensive Plan goal for year 2031 of 11,900 residential units in SLU would require: 1,765 units affordable for households up to 50% of AMI, 1,500 units for 51-80% AMI, and 2,383 for 81-120% AMI. Given these targets, how can land use, incentive zoning and mitigating factors get us there?

The DEIS is woefully inadequate in addressing the following factors:

- 1. There is no financial analysis or modeling of how many units of low-income housing would be generated through incentive zoning through alternatives 1-3. The DEIS merely states that alternative 1 would result in more units than alternatives 2 and 3. But do we know if the number of affordable units generated from alternative 1 are significantly more than the other alternatives-- to warrant the increase in zoning? There is also a puzzling blanket statement (Section 3.9-8) that reads: "Incentive zoning provisions under any of the action alternatives can ensure that the City has adequate capacity to meet current and future targets for the neighborhood." Does this mean that any of the selected choices can be designed to result in the target goals? Where is the financial analysis for what developers would be willing to pay for Housing Bonus or TDR in exchange for increased height and density?

1

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www.LIHI.org

2. There is no assessment of the number of developable properties/parcels for low-income housing that would become prohibitive in cost due to the up-zoning proposed in alternatives 1 through 3. The sites that nonprofit organizations seek out are smaller 40-80 unit sites for five-stories, stick-built over a concrete podium. Nonprofit developers have been successful thus far in finding and purchasing sites in SLU under the existing zoning. If we cannot find or afford significantly more expensive sites under alternatives 1-3, how can the Comp Plan goals be achieved? If we cannot afford sites even with subsidies using Housing Bonus funds, this could mean that affordable housing would have to be built in other neighborhoods and not in SLU.

2

3. The Transfer of Development (TDR) option listed under Mitigation Strategies, should be expanded to preserve all existing low-income housing, not just older (red brick) residential buildings as currently written (see Section 3.9 -14). Even newer subsidized buildings such as Denny Park Apartments and Lakeview Apartments will need rehab and upgrades in 20-30 years and being able to sell TDRs would ensure their long-term preservation. Allowing a nonprofit to sell TDRs from one building and use the funds for another affordable property would also make the program more attractive. Giving nonprofit owners and developers more flexibility can help us preserve and develop more affordable housing in SLU and other neighborhoods.

3

4. The increase in allowable zoning and height in the Cascade neighborhood to 85/160 under alternative 1 could result in the demolition and sale of older unsubsidized buildings like Carolina Court. This would result in the loss of 72 units at Carolina Court, 25 units at Grandview, and there are other examples as well. There is no financial analysis contained in the DEIS surrounding this problem.

4

5. There is no presentation of an alternative 4 or a new alternative 5 that simply rezones commercial zones that prohibit residential development to allow it under Seattle Mixed or SM.

5

6. The DEIS needs to include other strategies to achieving affordable housing targets in SLU. Section 3.9 -14 should include the following:

6

**SLU Acquisition Fund** – The city needs to assist nonprofits with acquiring sites at current lower prices for future development as mitigation for increasing height and density. Create a \$50 million revolving fund for acquisition of existing privately owned unsubsidized buildings and land in SLU. The city could work with Impact Capital or Enterprise to set up and leverage other resources for a SLU Acquisition Fund. Some of the goals of creating housing for low-wage SLU workers and family housing can be promoted in the Fund.

**Growth Fund** - The City Council and Mayor should re-establish the Growth Related Housing Fund where 20% of new construction tax revenue that flows to the city each year from downtown is committed to low-income housing in Downtown, SLU and close-in neighborhoods. Mayor Nickels eliminated the Growth Fund when he first took office. It was a very effective program that linked new commercial development with affordable housing. The Growth Fund can include new construction revenue from downtown as well as SLU.

**Tax Increment Financing** - Promote passage of state legislation and use of TIF for affordable housing preservation and development in SLU. Set targets so that at least

80% of the funds are allocated to meet low-income housing goals of 30, 50 and 80% AMI affordability.

| 6 cont

In summary, LIHI would be in favor of increasing height and density in SLU provided benefits of the housing bonus and TDR program and other mitigation would result in significantly more low income housing resources.

| 7

Thank you for the opportunity to comment on the DEIS. I can be reached at [Sharonl@LIHI.org](mailto:Sharonl@LIHI.org) or (206) 443-9935, ext. 111.

Sincerely,



Sharon H. Lee  
Executive Director

cc: Jim Holmes, DPD  
Marshall Foster, DPD

Holmes, Jim

---

**From:** Jerry Dinndorf [Jdinndorf@agcwa.com]  
**Sent:** Monday, April 11, 2011 1:51 PM  
**To:** DPD\_Planning\_Division  
**Cc:** Holmes, Jim; Harrell, Bruce; Godden, Jean; O'Brien, Mike; Licata, Nick; Conlin, Richard; Bagshaw, Sally; Clark, Sally; Burgess, Tim; Rasmussen, Tom; Raup, Ethan; Sugimura, Diane  
**Subject:** SLUCC SLU Height and Density DEIS Comments  
**Attachments:** DEIS LtrFinal DOC041111 (3).pdf; SLUCC DEIS Ltr Attachment Edited Final 040811.pdf

Seattle Department of Planning and Development  
Attn: James Holmes

Attached are the comments of the Southlake Union Community Council on the Height and Density Draft Environmental Impact Statement. Our comments include a cover letter with overarching comments on the rezone process and an attachment with detailed comments on the environmental impacts and mitigation measures. The comments represent the diverse interests of our neighborhood on the DEIS.

We look forward to the development of a final height and density alternative for Southlake Union and timely action by the Council on adopting new zoning for Southlake Union. The opportunities to achieve desired community benefits that can result with increased height and density will be lost if the rezone process languishes and development continues under the current zoning designations.

Thank you in advance for considering our comments. The Southlake Union Community Council is committed to achieving a vibrant and sustainable urban center here in Southlake Union.



Jerry Dinndorf  
President, South Lake Union Community Council



April 6, 2011

Seattle Department of Planning and Development
Attn: James Holmes
700 Fifth Ave., Suite 1900
P.O. Box 34019
Seattle, WA 98124-4019

Jerry Dinndorf,
President
AGC Seattle

Dawn Oliver,
Vice President
Morningside Academy

Michael Blumson,
Treasurer
Plymouth Housing

Lorie Groth,
Secretary
Resident

Lloyd Douglas
Cascade Neighborhood
Council

Matthew Edwards
Equity Office

Dan Foltz
Weber Thompson
Architects

Molly and Joshua Franklin
Residents

Mike Kenney
Resident and Small
Business Owner

Pearl Leung
Vulcan Inc.

Mike McQuaid
Virginia V Foundation

Steven Paget
OAC Services

John Savo
NBBJ Architects

RE: South Lake Union Height and Density Draft Environmental Impact Statement (DEIS)

Dear Mr. Holmes,

As the City's designated steward of the Neighborhood Plan, it is the responsibility of the South Lake Union Community Council (SLUCC) to represent the diverse interests of our neighborhood on issues of public policy and development that have a direct impact on South Lake Union. We, therefore, feel compelled to offer direction and comments about the DEIS.

SLUCC has gone to great lengths, in a collaborative approach, to develop its DEIS comments based upon the community-adopted neighborhood plan. Principally, we seek to insure a walkable, sustainable neighborhood that balances housing and job growth and supports a diversity of businesses, organizations and families.

Presented below are our overarching comments on the DEIS as it relates to the overall South Lake Union rezone process. The attached matrix presents in greater detail the cumulative comments and lists all our comments on environmental impacts and mitigation measures.

OVERARCHING COMMENTS

- The Urban Design Framework (UDF) needs to take a primary role in the rezone process
Clear and effective mitigation is essential for all the proposed alternatives
Significant Growth in South Lake Union argues for proportionate allocation of funding

1
2
3



- ***In order for the EIS to provide adequate guidance to determine the Preferred Alternative, additional analysis must be conducted***

Further analysis would be required to address the flight path changes and the need to reflect all the transportation projects not represented in the current analysis. Please see the matrix for specific recommendations.

- ***Economic Impacts need to be addressed in the EIS***

The EIS does not address the economic impacts of the Height and Density Alternatives. South Lake Union is slated to support 16,000 new jobs by 2024 which may well be exceeded. The relationship between this target and the capacity of work places to absorb this growth should be evaluated relative to the different densities and heights represented by each alternative. The benefits of an increased tax base in terms of the City's ability to provide police, fire transportation, community improvements, schools, etc should be presented in the EIS.

The SLUCC asks that you consider these overarching comments as highlights of the more detailed comments outlined in the matrix provided. They represent critical areas of concern and requests for specific action. The SLUCC has been an integral part of developing the alternatives and scoping the EIS since its inception. We thank you for your attention and look forward to continuing to work with the City on finalizing the EIS and working towards the preferred alternative.

We stay hopeful and committed to achieving a vibrant urban center that is not only a great place to live and work, but also a proud example of a sustainable urban community.

Sincerely,

Jerry Dinndorf  
President, South Lake Union Community Council (SLUCC)

Attachment: SLUCC Comprehensive Comments – April 2011

- cc: Councilmember Tim Burgess  
Councilmember Sally Bagshaw  
Councilmember Sally Clark  
Councilmember Richard Conlin  
Councilmember Jean Godden  
Councilmember Bruce Harrell  
Councilmember Nick Licata  
Councilmember Mike O'Brien  
Councilmember Tom Rasmussen

Ethan Raup, Office of the Mayor  
Diane Sugimura, Office of Planning and Development

Jerry Dinndorf,  
*President*  
AGC Seattle

Dawn Oliver,  
*Vice President*  
Morningside Academy

Michael Blumson,  
*Treasurer*  
Plymouth Housing

Lorie Groth,  
*Secretary*  
Resident

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Pearl Leung  
Vulcan Inc.

Mike McQuaid  
Virginia V Foundation

Steven Paget  
OAC Services

John Savo  
NBBJ Architects

4  
5  
6



## South Lake Union Community Council Comprehensive Comments on the Draft Environmental Impact Statement for the South Lake Union Height and Density Alternatives - April 2011

Affected Environment, Significant Impacts, Mitigation Measures and Unavoidable Adverse Impacts

(Major Issues identified by the SLUCC are shown in green)

Section	Title	Comments
3.1	Geology and Soils	
3.2	Air Quality	
3.3	Water Quality	
3.4	Plants and Animals	<p>Even with the inadequate one day shadow studies there are large impacts to the newly restored natural habitat areas in Lake Union Park. Located in the southwest portion of the Lake, the natural shoreline is intended to aid in the restoration of fish and fowl populations in the Lake and to those transiting the area.</p> <p>The one day figures do not measure the length and duration of the shadows over the lake and shoreline so there is no way to see if there is any degradation or mitigation(s) needed.</p> <p>Further study is needed, especially in the Dexter and Fairview areas, of the impact of shadows on plant life and its supporting role in restoring water quality for wild life and people.</p>
3.5	Environmental Health	
3.6	Noise	

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3.7	Energy (Greenhouse Gas Emissions)	<p><b>3.7.2:</b> Since the estimates for total jobs, households, office and retail square footage are respectively the same for Alternatives 1, 2, and 3, it is hard to understand how there could be any differences between these alternatives for GHC house gas emissions. (It is noted that there are small variations in VMT generated by each of these alternatives which could result in the differences but VMT generation is dependent upon the same variables.) But the slight variations shown in Table 3.7-7 don't appear to be significant. Presumably the City can document as to how it arrived at these differences but unless they are significant, the EIS should simply note for the reader that GHC emission between alternatives 1,2and 3 are insignificant.</p> <p><b>3.7.3 Mitigation Strategies:</b> Transportation Mitigation Measures: Noticeably absent from this section is the listing of transportation mitigation measures. Over the life of a building, Transportation is the single largest contributor to GHC emissions. These measures, if implemented, would reduce GHC emissions substantially. Transportation mitigation measures are listed in the transportation section and simply could be referenced here to show that significant reductions could be achieved through increased transit, TDM and walking or biking. Building Design: As stated under the Methodologies Section it should be noted here as well that "Green Building Design", i.e. Built Green, Energy Star ratings or LEED ratings, could reduce overall energy usage by at least 20 percent. It may also be appropriate to note the LEED ND designation for SLU as a mitigation strategy for both GHC and Transportation.</p>	8
3.8	Land Use	<p><u>Major Issue</u> - Much of what can happen in South Lake Union has already been determined by existing development or projects in the pipeline. The EIS needs to make a realistic assessment of what can be done with the parcels of land available for development. The likelihood of a block being redeveloped should be determined (development potential map underlay) and the impacts of those redeveloped blocks evaluated for each of the alternatives using 3-d modeling approaches</p> <p>Alternatives should be assessed as to how they support or detracts from developing a truly sustainable urban neighborhood. Each of the Alternatives should be analyzed against sustainability factors such as those contained in the South Lake Union LEED Neighborhood Development Pilot Project. For example, identify which alternatives emit fewer greenhouse gas emissions, etc.</p> <p>The Wind Analysis Mitigation Strategy recommends that, "The area of the tallest height limit should be located near the outer perimeter of the South Lake Union Neighborhood most distant from Lake Union," and to "Reduce overall building massing and height progressively, approaching the lake." If the buffers discussed above in "Overarching Comments" become prescribed requirements, this would substantively change the building heights and densities imagined in all three alternatives, but particularly Alternatives 1 and 2. (These Alternatives had focused height along corridors aligned with major boulevards.) Stepping down building height approaching the lake implies that the tallest buildings belong closer to Denny Street and the southern halves of our north-south boulevards on the east and west, Aurora and Eastlake Avenues. About a third of the area bordered by these three streets is within the Cascade Neighborhood, which has not been targeted for increased height in Alternatives 2, 3 and 4. Height prohibitions near the water would seem to encourage height increases along the full east-west dimension of the South Lake Union Neighborhood, including the Cascade Neighborhood. While some increased height may be appropriate in Cascade, particular attention will need to be paid to preserving access to sunlight for the Cascade Park and Playground.</p>	9 10 11

Land Use (continued)	<p><b>Lake Union Flight Operations.</b> The latter third of the Land Use Chapter, 3.8 is dedicated to this subject.</p> <p>The EIS reports that <b>“This flight path represents a refinement by WASHDOT of earlier flight path information that was available.”</b> It is very regrettable that this information was not known before the EIS options were created, let alone very late before publishing the document.</p> <p>The flight path envelope now looks much wider than previously shown, but I am told that it is not – that said there are several additional factors that could intensify its newly represented volume:</p> <ul style="list-style-type: none"> <li>▪ A vertical [safety] buffer will likely get added, lowering heights, which has not yet been quantified.</li> <li>▪ A wind shear buffer will likely get added, presumably widening the flight path diagram further, which has not yet been quantified.</li> <li>▪ A turbulence buffer will likely get added, presumably widening the flight path diagram further, which has not yet been quantified.</li> <li>▪ The 25’ height increments in the flight path diagram are based on the lake, so as the envelop rises, so does the ground.</li> <li>▪ Zoning heights typically have a 10% (or so) additional height allowance for rooftop mechanical, etc. The [final] flight envelope and its buffers will be absolute, so subtractions from potential tower heights will need to be made for roof top appurtenances.</li> </ul> <p>What does the Flight path envelope and its buffers mean, moving forward?</p> <p>If the west side of the neighborhood is challenged to support appropriate density due to the final flight path envelope and if the Cascade neighborhood doesn’t want density, is it possible that the alternatives might need to be modified?</p> <p>We ask that this section be brought back for public comment if the changes to the buffer areas become substantially different from what's presented in the EIS.</p> <p><b>Transfer of Development Rights (TDR)</b> Incentives should include the possibility for TDR transfers from sites that do not currently utilize their full development capacity but feature older, character defining buildings. Smaller and older structures add diversity in appearance and use within our neighborhood, and the incentive program needs to create opportunities for their preservation, independent of whether they achieve landmark status.</p>
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3.9	Housing	<p><b>Major Issue</b> - The EIS simply states that all alternatives meet the city's growth targets. It does not assess the amount of affordable and market rate housing that could result from each of the Alternatives. Incentive zoning is one of the few tools at the city's disposal to make sure that affordable housing is developed within South Lake Union and not pushed to the peripheries of the city. Similarly, the funds generated could also go to developing other needed community facilities such as a community center. The draft EIS needs to provide guidance about which alternative would best serve these needs.</p> <p><b>3.9.1:</b> Overall, the review team believes that there needs to be a comprehensive housing inventory done for the neighborhood. The last time that was done by Office of Housing was back in 2004. The inventory shown in the DEIS is not complete and is missing several buildings such as Alterra Condominiums, the ArtStable in Cascade, the Pontius apartments, and the Harrison apartments. In addition, in Table 3.9-1, it neglected to reflect 50 income restricted units in the Borealis.</p> <p>Housing Affordability - If a complete inventory of housing is done in SLU, it should reflect not only the income-restricted affordable units in the neighborhood, but should also show the affordability of the housing stock itself. There are several mid-sized unrestricted apartment buildings such as the Union Bay Apartments or Carolina Court that are older and considered affordable based on King County median income guidelines. That would give a much more accurate picture of the baseline of affordable housing in SLU and where exactly are the gaps of affordability in the housing continuum. Focus Areas - Why were Cascade and the northwestern pan handle of SLU excluded in the focus area where there are existing concentrations of housing?</p> <p><b>3.9.2:</b> Housing Affordability - The Comprehensive Plan Housing Policy spells out citywide affordable housing goals as 20% of expected housing growth earning up to 50% of AMI; 17% of expected housing growth earning from 51-80% of AMI; and 27% of expected housing growth earning 81-120% of AMI. Those are great and much vetted citywide goals that would ensure our city is affordable to all who work in Seattle. However, we'd like to know how housing affordability is distributed throughout the city. How do other neighborhoods compare in achieving those affordability goals? Or is much of that responsibility put on SLU and other neighborhoods like Rainier Valley?</p> <p>Issue of potentially displacing existing wood frame buildings and older single family residences - The review team thought that if we did a complete inventory of existing SLU housing, we would have a better understanding of the stock and current use of older single family houses and wood frame buildings in the neighborhood. That information would help the community identify the level of protection these buildings should have. For instance, we know of at least one such single family structure in the neighborhood that has not been used for housing for years and been an office instead. There was discussion about obtaining the number of affordable units that these buildings provide and comparing that with the number of affordable units a new development could bring through incentive zoning on the same sites. We also question the quality of affordable housing that these existing buildings provide, particularly 30+ years out when full build-out is expected. Also, the impact of those types of buildings should be the same under Alternative 4. The likelihood of displacement in the long run for those buildings would be the same if zoning does not change.</p> <p><b>3.9.3:</b> If a comprehensive housing inventory is conducted, it should identify existing affordable housing (both income restricted and unrestricted) that could qualify for TDR. This would be in addition to only the red-brick buildings that were mentioned on page 3.9-14. Under the "Employers Promoting Living Near Work" mitigation strategy, it should make clear mention of promoting living near work for employees of all wages and levels. What about other strategies to preserve unrestricted affordable housing stock such as making it easier (via building codes) to renovate existing housing stock?</p>
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Aesthetics (continued)

- Open spaces. Throughout much of the UDF process, the importance of open spaces was discussed. Critical to Aesthetics as well as other things, open spaces are critical. There were many thoughts in the UDF about incentivizing or even requiring some form of open space(s) for projects pursuing towers. Many of the computer simulations would look extremely different and better had there been open spaces in them. (Note: We read the Open Space sub-chapter and found nothing specific relating to open spaces provided by projects/ development. That document dealt more with parks and other public open spaces.)
- “Bread Loaves versus towers.” For years, Seattle has been wrestling with these idioms. Through the UDF, these were debated. For the review team, “bread loaves” or mid-rise buildings are synonymous with little relief as they are assumed to be for the most part built out to their property lines to maximize their square feet. Conversely, “towers” have been synonymous with not only verticality but also with creating open spaces in exchange for being able to go higher than the underlying zoning.
- For the review team, the EIS did a poor job of differentiating between the mid-rise buildings and the towers, which is a fundamental issue. Without the distinctions that there are differences at podiums of towers (or towers without podiums) and the mid-rise buildings themselves, the EIS made us feel like we were to be looking at a comparison of mid-rise buildings and mid-rise buildings with towers on top of them, which is a fundamental problem.
- Other tower incentives. In addition to Open spaces, the UDF contemplated other controls and incentives to tower projects which a developer would have to commit to providing in order to go up, which most, if not all would provide opportunities for enhanced aesthetics. Those physical ‘incentive zoning’ provisions should have been included in the list of potential mitigations.
- Podiums. Podiums are very important to aesthetics. There is concern about the lack of attention in the document towards aesthetics at building bases. Many of us put high importance on aesthetics at the street level and the bases of buildings in general. Podiums get a few scant references in the text, but aren’t looked at comparatively and they don’t get much if any attention in the 3-D models. It is mentioned that podiums aren’t required, but there are no graphics that study that premise, Podium heights, their treatments, what is allowed in them (example: above-grade parking), and other considerations are very important. Are there provisions for limiting podium sizes? Example: If a developer needs at least four parcels/ lots (or typically 240’ by 108’ or 120’) in order to satisfy the 22,000 SF lot size requirement for towers, won’t they want to have an above-grade parking garage that is 240’ long, above the ground floor? Is that what we want?
- Tower Spacing? There is no reference to, or study of, tower spacing in the document. We understand that the City may be presently avoiding it. Having a minimum of 4 parcels, mentioned above, may limit towers to a maximum of two per block, but it does nothing to control which four contiguous lots and what if the neighbor across the alley wants to develop the same four lots directly across the alley, and what if they are both mid-block sites? It appears that we are all left to hope that towers always get developed on opposite ends of the block from each other. Why is this issue not addressed in the EIS?

	Aesthetics (continued)	<p>- Re-orienting blocks. In the UDF, there was great support early on for having the ability to rotate block orientation, allowing buildings to orient east-west axially instead of north-south, improving solar angles, increasing space between towers and having other positive benefits (like greater porosity towards the Space Needle and the Sound). Why is this issue not addressed in the EIS aesthetics section or is that no longer being considered?</p> <p><b>3.10.1:</b> There are three “<i>Focus Areas</i>” listed – 8<sup>th</sup> Avenue North Corridor, Fairview Avenue Corridor and Valley/ Mercer Blocks. <i>Focus Areas</i> are defined as being “subareas in the South Lake Union neighborhood that are considered in greater detail, where applicable.” There is no explanation of why there are Focus Areas, why there are only three, or why these three. While the three chosen are deserving, the review team feel that their inclusion in the EIS should be explained and made relevant and there should be consideration of other <i>Focus Areas</i>. The UDF identified several such potential areas of focus. To name a few that came to the minds of the review team:</p> <ul style="list-style-type: none"> <li>▪ Seattle Times Blocks</li> <li>▪ Denny Park area</li> <li>▪ Cascade Park area</li> <li>▪ Westlake corridor</li> <li>▪ Broad Street corridor (radical change there)</li> <li>▪ John Street Hill Climb block</li> <li>▪ John, Thomas and Harrison corridors, specifically pertaining to the “re-stitching” zone of South Lake Union and Uptown.</li> </ul> <p><b>3.10.2:</b> There are several assumptions listed. The review team had a few comments</p> <ul style="list-style-type: none"> <li>▪ “<i>All undeveloped and under-developed sites will redevelop in the future.</i>” The review team questions the relevance of this statement absent any consideration of the actual, likely amount of time in which this will happen. The planning parameters for this EIS seem to us to be shorter than the many decades it would take to develop all remaining sites in South Lake Union.</li> <li>▪ “<i>Property owners with sites larger than 22,000 SF will use available zoning incentives to build the maximum gross building area allowable, while sites with less than 22,000 SF will develop consistent with underlying zoning.</i>” Is this equitable and fair to the “little guy?” For example, in a commercial situation, a property owner who has a site less than 22,000 SF would never be able to develop to an FAR of 7. Meaning that the de-facto zoning for two adjacent properties, one greater than 22,000 SF and one less, are radically different.</li> <li>▪ “<i>On-site structured parking will be provided half above grade and half below grade.</i>” The review team does not understand why this is, or even should be an assumption. We further-more think that this assumption is flawed. Per the UDF process, there was a lot of conversation about parking, treatment of above grade parking, encouraging or even incentivizing below-grade parking, with possible exemptions for high water table, etc. The simple assumption above seems to ignore the UDF.</li> </ul>
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Aesthetics (continued)	<p><b>Figure 3.10-2 – 3.10-9:</b> These first show on page 3.10-9, but continue throughout the document. The review team questions the relevance of views that are never seen by anyone not in a seaplane.</p> <p><b>Alternative 1 Page 3.10-19:</b> <i>“Of the development alternatives, full development under Alternative 1 could have the greatest impact on aesthetics in that this alternative would permit the greatest building heights and could result in the greatest increase in development density.”</i> Members of the review team feel that “greatest impact” (on aesthetics) can be good or bad and should be less vague and more completely addressed. Lorie views greater height and dense spacing of towers as having a negative impact on aesthetics due to shadowing, etc. Dan believes that taller buildings should provide open space and/ or other amenities to get their height, making for example, pocket parks that would not otherwise be provided. This was discussed at length through the UDF process, but seems to be lost in this EIS. Dan also generally believes that high rises typically have budgets that provide for better quality architecture, better massing proportions, etc. Lorie is concerned that the realities of economic pressures may lead to a future of aesthetically-challenged buildings blocking views of iconic landmarks (e.g. the Space Needle) unless addressed.</p> <p><b>Transitions Page 3.10-20:</b> Places of transition with neighboring low and mid-rise neighborhoods, such as Uptown, are referenced in the bottom two paragraphs of this page. The review team feels that this is a very important and relevant concern, particularly in Alternatives 1 and 2 which are tall on the western edge of SLU. Due to the possible discrepancy in zoning between the South Lake Union and the Uptown neighborhoods due to a re-zone, we agree with the EIS statement that <i>“it may be appropriate to address this potential issue by addressing the zoning of the Uptown Triangle and South Lake Union neighborhoods together rather than independently.”</i></p> <p><b>Significant Unavoidable Adverse Impacts Pages 3.10-39, 80, 88 &amp; 92:</b> When considering the magnitude and differing amounts of potential growth of South Lake Union between the Alternatives, the review team was genuinely surprised that all four areas of EIS review (Height/ Bulk/ Scale, Views, Shadows and Light and Glare) were summed up with the statement <i>“No significant unavoidable adverse impacts to [all categories] are anticipated.”</i> We need to better understand how a Determination of No Significance is made in each case.</p>	<p>25</p> <p>26</p> <p>27</p> <p>28</p>
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3.11 Historic Resources

**3.11.1 Affected Environment**

*Existing Conditions, "Development of Seattle's South Lake Union Area":*

We recommend shorting the section and simply citing additional more detailed accounts of neighborhood history.

Detail the strong connection between historic preservation and affordable housing in South Lake Union, perhaps mentioning specific properties in both lists (see EIS chapter 3.9 Housing). City zoning prohibited new residential uses from roughly the 1920s to 1990s, a period during which a wide range of housing was built in adjacent neighborhoods like Capitol Hill, Uptown/Lower Queen Anne, and Eastlake.

"Construction of I-5 further defined the identity ... [and] made the South Lake Union area increasingly attractive" (page 6) is not accurate. Nyberg and Steinbruck describe the freeway construction as "irreparable damage" and other retrospectives characterize that as a period of decline for the neighborhood leading to surface parking lots instead of active uses.

Instead of focusing on types of businesses present at various time periods, draw a connection to the potential landmarks from those times. For example, employees of early industries may have worshiped at the wood-frame Immanuel Lutheran Church and lived in the brick apartment houses. Postwar decline led to relatively inexpensive land, allowing architectural variety such as the J. Lister Holmes/Holly Press Mid-Century Modern building.

We suggest changing "Development ... 2000-2010 has consisted mainly of five- and six-story buildings as well as apartment buildings and condominiums of up to six and seven stories on consolidated, full- and half-block parcels" to something like "has consisted of a variety of building sizes and types, including many residential buildings." There has been great variety in heights and parcel sizes; Mirabella which is pictured on that page is 125 ft (12 stories), as are several Amazon buildings; Alcyone is 8 stories, and many developments like Veer (condos), Bart Harvey, Art Stable, and SCCA House, are all on smaller parcels.

Mention successful recent preservation, for example the New Richmond Laundry building at Alley24, transfer of development rights (TDR) program between the Brewster Apartments and 2200 Westlake, and the Naval Reserve Armory as MOHAI at Lake Union Park.

201 Boren (parcel 1986200370) has been demolished, and 223 Pontius Ave N (parcel 2467400455) will be soon (site has a MUP).

**3.11.2 Environmental Impacts**

This section does not appear to capture the complex interplay between development incentives and historic preservation, instead simply stating that the greatest development opportunity leads to the greatest pressure on existing structures. However, because the close-in location of South Lake Union is much more valuable today than when smaller-scale historic buildings were constructed, many are already

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	Historic Resources (continued)	<p>highly likely to be redeveloped at current zoning levels. Various incentive zoning and transfer of development rights programs provide an important opportunity for preservation, meaning that Alternative 4 (No Action) may be the least attractive.</p> <p><b><u>3.11.3 Mitigation Strategies</u></b></p> <p>We agree with the need for a wide range of mitigations, including an updated survey and landmark nominations, including buildings that have only recently become eligible (25 years for City of Seattle).</p> <p>We would also like to see a survey of additional mitigation options that have been successfully employed elsewhere.</p> <p>Since the city transfer of development rights (TDR) program saw some success before it expired, it should be renewed without the need for feasibility analysis.</p> <p>There is also opportunity for preservation partnerships with local non-profit housing organizations such as LIHI and Capitol Hill Housing, architectural advocacy organizations such as Docomomo WEWA and Historic Seattle, and other non-profits like MOHAI.</p> <p>Lastly, even when full preservation is not possible we would like to see preservation of historic elements into new projects. For example, some of the remaining Northern Pacific Railroad tracks in Terry Ave N and Valley St could be incorporated into future development.</p>	30 cont 31
3.12	Cultural Resources	<p>CULTURAL RESOURCES: Section does not relate to current cultural resources. It could have had an inventory of current social/cultural resources in the district and failed to do so. It failed to stress the low income and family resources such as the Cascade Peoples Center and Lutheran Community Services. Potential impacts to these cultural resources should be studied under each alternative.</p>	32
3.13	Transportation	<p><u>Major Issue -</u> The recently completed South Lake Union Mobility Plan should be incorporated into the EIS as a mitigation strategy. This community sponsored plan makes a number of modal recommendations that will significantly reduce the transportation impacts of the Height and Density alternatives.</p> <p>The Corridor LOS Analysis indicates that Republican Street has not been identified as a study corridor because Thomas and Harrison streets are similar based on existing traffic patterns and any development-related impacts are expected to be similar on all three streets. In fact, Republican Street has been identified as the main exit into South Lake Union from the northbound Deep Bore Tunnel, and therefore should be studied as a corridor with its anticipated increased traffic.</p> <p>The Mercer West project is not assumed for purposes of analyzing transportation impacts. This substantially if not fully funded but not yet built project includes the widening of the underpass under Aurora with 3 lanes for each direction of traffic and a grade-separated bike and pedestrian path. This widened underpass is critical to the proper functioning of all of the Mercer Street improvements, as well as the functioning of the access/egress to the tunnel North Portal. It therefore needs to be included in the mitigation evaluations.</p> <p>The amount and type of Housing generated within South Lake Union by each of the alternatives and its corresponding ability to limit trip making into and out of the area should be considered as a traffic mitigation strategy.</p>	33

	Transportation (continued)	<p><u>General Comments</u></p> <p>The overall findings of the EIS Transportation section seem to indicate that traffic will inevitably worsen in South Lake Union regardless of which alternative is chosen. Can we really know this unless we study the No Action Alternative with mitigation that we know will happen? And are the projected traffic volumes accurate counts?</p> <p>We need more information and the confidence that the information provided is accurate to most successfully assess the transportation section.</p> <p>3.13. Tables ES2 and ES3 (pgs. 2 &amp; 4): The purpose of these tables is to show the difference in traffic volume for each of the four alternatives with implemented mitigation strategies. For the No Action Alternative, no mitigation strategies are assumed. This data seems incorrect because many of the mitigation strategies will happen, as they are part of planned traffic projects in South Lake Union. We would like to see the assumed traffic volume from the No Action Alternative with these mitigation strategies applied.</p> <p>Mitigation Measures identified (pg. 2): The EIS document states: ‘Potential mitigation measures to provide this system include the implementation of bicycle and pedestrian improvements identified in plans and documents such as the Seattle Pedestrian Master Plan, Bicycle Master Plan, and South Lake Union Urban Design Guidelines.</p> <p>3.13 .1 Affected Environment - Multi-Use Paths (pg.8): Two multi-use paths are identified as being viable transportation options for cycling to and through South Lake Union: Cheshiahud Lake Loop and the Lake to Bay Loop. Neither of these multi-use trails is actually a ‘trail,’ but a combination of sidewalk, street and multi-use path. Because of this, these loops function only as recreational bicycle paths and not effective transportation cycling options.</p> <p>Traffic Safety (pg. 33): High accident locations are identified for future safety improvements, and intersections are graded from safe to dangerous based on how many accidents occur at each intersection. Is there a way to evaluate safety based on near misses? There are several intersections of great concern that have NOT been identified for safety improvements (9th &amp; Denny, Westlake &amp; Valley, Westlake &amp; Thomas, for example). Let’s improve the safety before people are seriously injured or killed.</p> <p>This section also addresses changes in bus routes expected by 2031. While new/changed bus routes to service SLU would be great, we question the assumption that this will happen, when changes to infrastructure that are already planned are NOT assumed in the mitigation evaluations (3-way Mercer underpass for example).</p> <p>2031 South Lake Union Land Uses (pg. 52): Total Lane Use Figure shows the existing conditions and expected conditions in 2031 given the three zoning alternatives. Where did the projections on expected jobs and residences come from? Is full build-out assumed for each alternative? Sources should be listed.</p> <p>It is noted in the chart description that Alternative 3 has slightly fewer jobs and a “residential focus.” Having fewer jobs is not the same as having a residential focus, which instead would imply more households.</p> <p>3.13 .3 Environmental Impact – Deficiencies of the No Action Alternative - Parking (pg. 64, Table -12): This table shows estimated additional off-street parking. Where did these numbers come from? Are these assumptions in line with current market-provided parking in South Lake Union? Are developers currently providing 1 parking space per dwelling unit, for example?</p> <p>3.13 .6 Mitigation Strategies (pg. 77): The mitigation for South Lake Union focuses on methods to decrease the number of vehicle trips and maximize the number of bicycle, pedestrian and transit trips in order to impact mode splits. The EIS states: “From both a policy and feasibility</p>	<p>34</p> <p>35</p> <p>36</p> <p>37</p> <p>38</p> <p>39</p> <p>40</p>
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	Transportation (continued)	<p>perspective, increasing roadway capacity is undesirable and cost-prohibitive.” Given that shifting modes is the only available mitigation for SLU, we believe education and community outreach programs should be part of the mitigation efforts. Just because it becomes more difficult to drive does not mean that people will automatically convert to other modes of transportation.</p> <p>Errors in EIS</p> <p>Pg. 20: Figure 3.13-7 is titled “Off-Street Parking Supply and Occupancy,” and it should be titled “On-Street Parking Supply and Occupancy.”</p> <p>Pgs. 29, 57 and Figures 4, 9, 13 and 17: Valley Street is mislabeled as Yale Avenue North as part of the Fairview Ave N. study corridor.</p> <p>Figure 14 indicates Roy Street is a through-street allowing access across Aurora Avenue for cars, cyclists and pedestrians. This information is incorrect and this graphic is misleading.</p>	40 cont 41
3.14	Public Services	The only Public Services considered were Police and Fire, and the consideration of police and fire was inadequate. The section failed to actually look at the response times under each alternative.	42
3.15	Utilities		
3.16	Open Space and Recreation		



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April 11, 2011

Seattle Department of Planning and Development

Attn: James Holmes

700 Fifth Ave., Suite 1900

P.O. Box 34019

Seattle, WA 98124-4019

Submitted via: southlakeunioneis@seattle.gov

RE: South Lake Union Height and Density Draft Environmental Impact Statement (DEIS)

Dear Mr. Holmes;

Dave Asher

Mike Cooper

Steve Crane

Dan Evans

Mike Harbour

Dave Janis

Sandeep Kaushik

Brian Painley

Dave Ross

Christian Sinderman

Thank you for the opportunity to comment on the South Lake Union DEIS. Transportation Choices Coalition is a statewide nonprofit organization working for more transportation choices for all Washingtonians. We believe that providing diverse transportation choices in our cities is a critical strategy to accomplish many social and environmental goals, including supporting greater physical health associated with more active lifestyles, connecting residents to jobs and destinations, reducing transportation related greenhouse gas emissions, and lowering household expenses associated with vehicle ownership and use.

Thank you to the Department of Planning and Development for the years of time and resources that have been put into planning for the future of the South Lake Union neighborhood. South Lake Union is projected to accommodate over 20% of the City's housing and job growth in the next twenty years. With its growing employment center, proximity to downtown Seattle, and connectivity to other urban centers including the University District, South Lake Union represents one of the best opportunities in the central Puget Sound region to accommodate growth with social and environmental *benefit*, rather than *impact*. In particular, the neighborhood's great potential for walkability and transit use—measured by its relatively tight street grid, mix of amenities and neighborhood destinations, good jobs-housing balance where people can live close to their jobs, frequent streetcar and bus service, and proximity to the Westlake Transit hub—make it a place in which people can live and work without relying on a personal vehicle.

Allowing more zoning capacity and flexibility and strengthening neighborhood transportation choices will ensure that this growth leads to a high quality of life for residents, as well as environmental and social benefits for the entire region.

**STAFF**

Rob Johnson

*Executive Director*

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*Director of Programs*

To this end, we make the following comments on the DEIS:

For the numerous reasons stated above, **we strongly support increasing zoning capacity and flexibility to maximize the potential for housing and job growth in SLU.** Alternative 1 in the DEIS would provide the greatest capacity and flexibility.

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However to maximize potential to create a great community with real transportation choices, the City must also improve transportation investments in the neighborhood. **We strongly support many of the recommendations of the South Lake Union / Uptown Triangle Mobility Plan to improve pedestrian, bicycling and transit use,** including:

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- Connecting the South Lake Union and Uptown communities with better east-west pedestrian and bike connections across Aurora Avenue
- Using "complete streets" standards for all roadway improvements in the neighborhood
- Implementing the Seattle Streetcar Plan that would connect the existing South Lake Union Streetcar to the funded First Hill Streetcar, as well as potential routes to the University, Seattle Center, and through Downtown.

In order to provide a more accurate analysis of the result of such zoning changes and infrastructure improvements, **we strongly urge that the EIS examine the projected per capita vehicle miles traveled and greenhouse gas emission production, rather than the gross change.** It makes sense that an increase in people would lead to an overall increase in greenhouse gas emissions. However data demonstrates that accommodating population and employment increases in dense in-city neighborhoods with diverse transportation choices lead to lower *per capita* greenhouse gas emissions than less dense scenarios. This critical analysis is not currently captured in the DEIS, creating a misleading suggestion that denser alternatives perform worse on vehicle miles traveled and greenhouse gas emissions than do less dense scenarios. We urge you to analyze the per capita impacts to more accurately describe the results of zoning alternatives.

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Thank you again for the opportunity to comment on the South Lake Union DEIS. Please do not hesitate to contact us if we can provide any further assistance.

Sincerely,



Rob Johnson, Executive Director  
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Table 4-2

Responses to Public Comments Received During the Comment Period

Comment Number	Response
<b>Letter 6: Smith, Leslie G.</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
<b>Letter 7: Swenson, Skip</b>	
1	<b>Support Alternatives 1 and 2.</b> The comment is noted.
2	<b>Community Amenities.</b> The comment is noted. Amenities are essential for a vibrant community.
3	<b>Transit and Bike/Pedestrian Infrastructure.</b> The comment is noted. Improvements are planned consistent with the alternatives that are noted.
4	<b>Incentives and Affordable Housing.</b> The comment is noted. Incentives are essential to a realization of the selected alternative.
5	<b>Regional TDR.</b> The comment is noted. Please see the Final EIS Chapter 2 for a discussion of regional TDR as an incentive zoning measure.
<b>Letter 8: O'Tool, Lori</b>	
1	<b>Support Alternatives 1 and 2.</b> The comment is noted.
<b>Letter 9: Danyluk, Edward</b>	
1	<b>Support Height and Density.</b> The comment is noted.
2	<b>Transportation Analysis.</b> The analysis identified significant and unavoidable impacts on several corridors throughout the study area. Additional analysis would not affect the overall results of the transportation that is contained in the EIS.
3	<b>Transportation Mitigation.</b> An EIS only requires that mitigation be identified. It does not require analysis of the mitigation implementation. Mitigation implementation and monitoring is carried out as a subsequent part of the height and density amendments, should the action go forward.
<b>Letter 10: Letter : Joncas, Kate</b>	
1	<b>Support Additional Employment and Residential Density.</b> The comments are noted.
2	<b>35,000 SF Floor Plates.</b> Beginning in late 2008 and continuing through 2009, the City worked with interested citizens and other stakeholders to define the broad alternatives to be studied in this EIS. Through this public process, the standard for commercial floor plate size was reduced from 35,000 sf to 24,000

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	sf. Please see the discussion of alternatives that were eliminated from consideration (Draft EIS Section 2.3.7.). Conceivably, larger floor plate size may be appropriate in certain areas of the study area and localized study may be warranted.
3	<b>Minimum Lot Size.</b> As noted in the Response to Comment #2 above, the City worked with interested citizens and other stakeholders to define the alternatives to be studied in this EIS. Through this public process, the standard for minimum lot size was increased from 18,000 sf to 24,000 sf and 60,000 sf near Lake Union. Please see the discussion of alternatives eliminated from consideration, Draft EIS Section 2.3.7.
4	<b>Benefits of Increased Employment and Density.</b> The comment is noted. As the commenter states, the EIS does not discuss the economic benefits of the proposal. As required in WAC 197-11-402, EISs are required to identify probable significant adverse impacts, but are not required to address beneficial environmental impacts.  Please see Final EIS Section 3.2 for a discussion of the City's economic development policies that are contained in the Comprehensive Plan.
5	<b>Broader Range of Options.</b> The comment is noted. The alternatives that are part of this EIS were established through an extensive public outreach process and they are intended to present a reasonable range of options for Council consideration. Conceivably, the alternative that is selected could be a hybrid of the alternatives presented here.
<b>Letter 11: Woo, Eugenia</b>	
1	<b>Objectives of the Proposal.</b> It is recognized that preservation of the historic character of the area is an important consideration of the South Lake Union Neighborhood Plan. Although not specifically called addressed, historic character is assumed to be included in the objective of the proposal, which seeks increases in height and density to achieve neighborhood plan goals through an incentive zoning program. Potential incentive measures are identified in Draft EIS Section 3.11.3.
2	<b>Mitigation (Historic Resources).</b> Recommended mitigation will be determined by the City's decision-makers. The adoption of mitigation measures ultimately will be a policy decision made by the City and voted on by City Council.
3	<b>Historic Character.</b> The comments are noted.
4	<b>Properties Previously Identified as Potentially Eligible for Historic Designation.</b> The commenter is correct. The 802 Roy Street property was

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added to the "Properties Previously Identified as Potentially Eligible" matrix, Table 3.11-2, on p. 3.11-9 in the Draft EIS and to Figure 3.11-1, "Eligible and Designated Historic Sites."

Site no.	Parcel no.	Name (constr. date)	Address	Source
16A	4088803530	Puget Sound Power & Light Co. Shops (1926)	802 Roy St/800 Aloha St	2000 City Inventory / 2000 DAHP

**Letter 12: Aramburu, J. Richard**

**1 EIS Adequacy.** Please see responses to comments in this letter and in Letters 13 through 15, responding to comments from Lake Union Opportunity Alliance (LUOA). The City of Seattle has determined that the Height and Density EIS adequately meets state and local SEPA requirements.

**2 Statement of Need.** As noted in the Draft EIS, South Lake Union is one of the City's six designated Urban Centers. These are key areas within the City that are expected to continue to evolve as concentrations of employment and housing -- with direct access to high-capacity transit and a broad range of land uses that support the urban center employment and housing.

As described in Chapter 2, the proposal that is considered in the EIS would involve the potential use of incentive zoning as a strategy to achieve neighborhood plan goals and other public benefits. Incentive zoning would allow increased height and density if public benefits defined in City code are provided.

Capacity to accommodate future housing and employment is one of six objectives of the proposal that are identified in the Draft EIS (Section 2.1.2). Other objectives include:

- Advance Comprehensive Plan goals to use limited land resources more efficiently, to pursue a development pattern that is economically sound, and to maximize the efficiency of public investment in infrastructure and services.
- Provide for a more diverse and attractive neighborhood character by providing a mix of housing types, uses, building types and heights.
- Enhance the pedestrian quality at street level by providing amenities, taking into consideration light and air as well as public view corridors and providing for retail activity at key locations.
- Use increases in height and density to achieve other neighborhood plan goals such as increasing the amount of affordable housing, open space, and other public benefits through an incentive zoning program.

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	<ul style="list-style-type: none"> <li>Determine how to best accommodate growth while maintaining a functional transportation system, including street network, transit, and non-motorized modes of travel. Similarly, determine how to accommodate growth while maintaining functional capacity of utility systems, including electrical energy, water, sewer and storm drain systems.</li> </ul> <p>As described in the Draft EIS Section 3.8, the capacity of zoning to meet growth targets will be determined by the growth target that is ultimately adopted as part the City's 2031 Comprehensive Plan update. Such will entail a citywide review of growth capacity and targets. Please see also response to Comment 3 of this letter, below.</p>
<p><b>3</b></p>	<p><b>Growth Targets and EIS Timing.</b> As described in the Seattle Comprehensive Plan Urban Village Element discussion in Section 3.8, formal City action to establish a growth target will occur in the future based on an analysis of the capacity of all of the urban centers and other areas of the City. Consistent with the Washington Growth Management Act, the South Lake Union 2031 growth target that is ultimately proposed and adopted by the City will reflect an understanding of overall development capacity.</p> <p>As described in the Draft EIS Chapter 2, the proposal that is considered in the EIS is the potential use of incentive zoning as a strategy to achieve neighborhood plan goals and other public benefits. Incentive zoning would allow increased height and density if public benefits defined in City code are provided. Review of citywide growth targets is beyond the scope of analysis contained in this Final EIS.</p>
<p><b>4</b></p>	<p><b>Add Alternatives.</b> The No Action alternative considered in the Draft EIS would maintain existing zoning and, in that sense, would defer height and density changes that are proposed in this area of the City. It should be noted, however, that with deferral: 1) future development options would not be foreclosed, and 2) deferral would not necessarily eliminate or lessen the severity of environmental impacts identified – merely postpone them. In some instances, such could result in greater cumulative impacts as a result of changes in background conditions..</p> <p>As noted in the response to Comment 3, above, the proposal that is considered in the EIS is the potential use of incentive zoning as a strategy to achieve neighborhood plan goals and other public benefits. Such review does not require a citywide analysis of growth targets.</p>
<p><b>5</b></p>	<p><b>Economic Conditions.</b> The City issued the Scoping Notice for the Draft EIS on November 18, 2008 and invited comments on the EIS scope through December 18, 2008. Throughout 2009, the City worked with neighborhood</p>

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	<p>stakeholders to address concerns raised by the scoping comments. Based on this process, the City revised the EIS alternatives and finalized the scope of the EIS.</p> <p>Analysis of current economic conditions within South Lake Union was not included as part of the scope of this EIS. As noted, the focus of this EIS is a 2031 planning horizon. Review of current economic conditions would not provide a sufficient level of information to inform decisions regarding long-term height and density standards within the neighborhood.</p>
<p><b>6</b></p>	<p><b>Housing and Employment Analysis.</b> Please see the response to Comments 2 and 3, above. The proposal that is considered in the EIS is the use of incentive zoning as a strategy to achieve neighborhood plan goals and other public benefits. The proposal does not include identification of 2031 growth targets in South Lake Union or citywide.</p>
<p><b>7</b></p>	<p><b>Views to the Neighborhood.</b> The potential for future development projects in South Lake Union to change views from adjacent neighborhoods will depend on several variables:</p> <ol style="list-style-type: none"> <li>1) The location and elevation of views from existing and potential projects in those neighborhoods;</li> <li>2) The actual height, dimensions and location of future projects in South Lake Union ; and</li> <li>3) The effect of tower spacing requirements, floor plate size limits, and FAR limits for future projects within South Lake Union.</li> </ol> <p>As development occurs in South Lake Union as well as in the area south of Denny Way, there are potential changes to views from downtown and Belltown looking north to Lake Union, looking west from Capitol Hill, and looking south east from Queen Anne Hill. The tallest potential building heights studied are located between Denny Way and John Street between Eastlake Avenue and Aurora Avenue. These heights range from 160 feet to 400 feet. Projects built to these heights are likely to change views from existing and future development projects –particularly those located South of Denny Way and in Belltown. Elsewhere in South Lake Union the three action alternatives identify potential building heights ranging from 160 feet (125 feet at the lakefront) up to 240 feet. It is likely that future projects built to these heights would change views from Capitol Hill and Queen Anne hill. In light of the variables identified above it is not possible to precisely describe view changes to all locations that might experience a change of view, in the context of this non-project EIS.</p> <p>The City does not prohibit development that may result in changes to private views under the City’s SEPA ordinance. However, the potential for such</p>

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	<p>changes is one factor taken into consideration when the City Council makes rezone decisions, according to rezone criteria pertaining to height limits in SMC 23.34.009. As part of the Council process, citizens may provide comments to the City Council regarding potential changes to private or public views that might result from the proposed zoning changes.</p>
<p><b>8</b></p>	<p><b>Additional Viewpoints.</b> The City issued the Scoping Notice for this Draft EIS on November 18, 2008 and invited comments on the EIS scope through December 18, 2008. Through 2009, the City worked with neighborhood stakeholders to address concerns raised by the scoping comments. Based on this process, the City revised the EIS alternatives and finalized the scope of the EIS.</p> <p>The final scope for the EIS establishes that the view analysis will consider impacts to SEPA-designated public viewpoints and corridors. View perspectives that are analyzed in Section 3.10 of the Draft EIS include viewpoints designated by SMC 25.05.675.P. As noted, additional locations in and near the neighborhood have been included as part of the analysis; these include views from public or quasi-public viewpoints, as well as from designated scenic routes. As shown by Figure 3.10.22 of the Draft EIS, a total of fifteen viewpoints were analyzed.</p>
<p><b>9</b></p>	<p><b>Shoreline Management Act.</b> The cited Shoreline Management Act provisions apply when the views from a substantial number of existing residences in areas adjoining the shorelines would be obstructed by the proposed construction of buildings within the shoreline that exceed 35 feet in height. Because there are no existing residences on land adjoining the Shoreline District, these provisions do not apply.</p>
<p><b>10</b></p>	<p><b>Views to Lake Union.</b> The City's view protection policies address public views. Private views are regulated by the City through zoning and associated development standards.</p> <p>As noted in response to Comment 8, the scope of the EIS established that the view analysis would consider impacts to SEPA-designated viewpoints and corridors. View perspectives analyzed in Section 3.10 include viewpoints designated by SMC 25.05.675.P, as well as additional locations in and near the neighborhood that provide public or quasi-public views of the neighborhood, and designated scenic routes. As shown in Figure 3.10.22 of the Draft EIS, a total of fifteen viewpoint locations were analyzed.</p> <p>Please refer to the response to Comment #9, above.</p>
<p><b>11</b></p>	<p><b>Adequacy of Visual Analysis.</b> Please see responses to Comments 7 through 10, above.</p>

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12	<p><b>Bored Tunnel.</b> The Draft EIS does consider the impacts of the Bored Tunnel. As described on page 3.14-43 of the document, the Bored Tunnel was included as a reasonably foreseeable project and, therefore, the traffic attraction/diversion effects of the tunnel are included in the background traffic forecasts. No further analysis is required.</p>
13	<p><b>Use of MXD Model.</b> Draft EIS Appendix E presents the statistical evidence demonstrating that the MXD model is an appropriate tool available for analyzing dense mixed use environments, such as South Lake Union. The Institute of Transportation Engineers (ITE) Trip Generation Handbook, 2nd Edition, notes that the information in ITE's Trip Generation document is provided as general information only and if more relevant and locally valid information is available, that should be used instead of, or in conjunction with the national average information in the Trip Generation Handbook. Using traditional ITE rates would overestimate the number of automobile trips generated by the potential land uses allowed by the height and density increase.</p>
14	<p><b>Non-auto Trips.</b> The Draft EIS notes that internal, pedestrian, and bicycle travel is expected to account for about 27-28 percent of travel in the future. Compared to current conditions, this level of non-motorized travel is higher, but not unreasonably so. As shown on page 3.13-40, the businesses surveyed as part of the City's Commute Trip Reduction program have non-motorized mode shares between 2 and 21 percent, with an average of about 10 percent. However, businesses are only part of the equation. Based on data from the US Census Bureau, existing residents in South Lake Union and other more residential neighborhoods nearby have comparatively high walk/bicycle mode splits ranging between 29 and 40 percent. Considering the projected increase in residential population in the area, the estimates from the MXD tool are reasonable. Related to transit, the Draft EIS does provide a transit ridership and impact assessment for the streetcar and other transit routes in the area. The results are presented on pages 3.13-62-63 and 3.13-73-73. The results show that the transit patterns will be similar with and without the proposed action, but that ridership will be higher and more routes will have load factors that exceed the City's standard under the three action alternatives.</p>
15	<p><b>Feasibility of Mitigation.</b> The purpose of the Draft EIS is to document probable environmental impacts and identify reasonable and appropriate measures that could mitigate the significance of the impacts. Mitigation measure implementation is addressed in subsequent phases of the environmental and legislative process. However, it should be noted that the City has a long track record of delivering transportation improvements to the</p>

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	<p>South Lake Union area, as is evident in the recent improvements related to the Streetcar, streetscape enhancements along streets such as Terry, John, and Yale, just to name a few. Moreover, the City is making a considerable investment in the Mercer Street upgrades. Lastly, the City has a long standing fee program in the area where developers can either elect to pay the fee to implement transportation improvements, or conduct a separate SEPA review to identify mitigation measures that the City then requires as conditions of approval of a project's Master Use Permit.</p>
<p><b>16</b></p>	<p><b>Adequacy of Parking Analysis.</b> The parking analysis focused on the hours between 8 AM and 8 PM, the period over which parking information is available from SDOT. The DEIS does identify that on-street parking utilization rates peak in the 7-8 PM hour in 2010 (see page 3.13-21). The commenter's assertion that on-street parking is fully utilized is not supported by the available data. While evening parking demand could increase with additional restaurant/bar uses in the area, SDOT is committed to pricing parking in such a way as to ensure an adequate supply of short-term on-street parking. Evidence of this effort is documented by the on-street parking pricing adjustments in 2010 and 2011. In addition, the Draft EIS points out that parking is not like other environmental impacts in that parking impacts are controllable through additional market forces. The City of Seattle is continually revising its parking rates/policies throughout much of the City (including South Lake Union), to address demand/supply imbalances. With demand and supply balanced by price, those who elect to drive and park will be able to find a parking space over the long-term and no long-term parking impacts are expected.</p>
<p><b>17</b></p>	<p><b>Parking North of Mercer.</b> The lack of existing conditions parking data in the northern portion of the study area does not affect the impact findings related to parking. As described in the Draft EIS, short term parking shortages and impacts to those seeking parking are possible; however, long-term impacts are less likely as the market will respond to the parking demand through parking pricing adjustments and new supply. Based on field observations, parking appears to be more constrained south of Mercer given the more intense uses in the area.</p>
<p><b>18</b></p>	<p><b>Future Year On-street Parking Analysis.</b> The Draft EIS acknowledged that changes in street design (specifically related to bus layover locations) could reduce the amount of short-term on-street parking supplies in South Lake Union. Given the configuration of the streets and future projects to add bicycle facilities and other non-auto improvements, it is unlikely that additional on-street spaces will be provided. As noted in the Draft EIS, the</p>

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	potential removal of spaces coupled with additional land uses could lead to short-term parking shortages. However, long-term shortages and impacts are not anticipated since the City periodically adjusts on-street parking rates to ensure that an adequate supply is available for short-period visitors.
19	<b>Additional Parking Analysis.</b> The comment asserts that residents, employees, and visitors are insensitive to changes in parking pricing. This assertion is not supported by any academic literature and is inconsistent with observations in the nearby Belltown neighborhood. In Belltown, it is fairly easy to find both on-street and off-street parking because prices are set to manage the supply. The only time on-street parking is scarce is during unpriced periods like Sundays and holidays.
20	<b>Open Space Demand.</b> Draft EIS Table 3.16-2 is part of a larger description of existing City of Seattle park planning guidelines and is excerpted from the City of Seattle <i>2006 Gap Report Update</i> , which does not include a comparison to the 2031 planning horizon. A comparison of parks and open space to the 2031 planning horizon estimated in the Draft EIS is provided in the discussion of impacts (Section 3.16.2).
21	<b>Recreation Areas.</b> Existing park and recreation facilities are listed in Table 3.16-1 of the Draft EIS. This listing includes all park and open space facilities within 0.5 miles of the South Lake Union Neighborhood. Active recreation facilities are included in this list. Section 3.16.2 includes a discussion of potential impacts to both active and passive recreation areas.
22	<b>Park Access.</b> It is acknowledged that the facilities listed in Table 3.16-1 of the Draft EIS identify all facilities within 0.5 miles of the neighborhood and do not differentiate by how they may be accessed. It is reasonable to assume that residents and employees may choose to access nearby parks through modes other than walking.
23	<b>Park Mitigation.</b> Draft EIS Section 3.16.3 identifies mitigation strategies for potential park and open space impacts. Actions that would require a change to the City's Capital Facilities Plan are not identified in the mitigation strategies. As noted in the comment, the Growth Management Act requires that capital facilities plan meet the levels of service established by the City.
24	<b>North Downtown Area Park Plan.</b> The comment refers to a summary of the City's North Downtown Park Plan. Identification of the impacts of the alternatives in 2024 and 2031 is provided in Draft EIS Section 3.16.2, Environmental Impacts.
25	<b>Capital Facilities.</b> The comment refers to a stormwater system map that

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	<p>shows existing stormwater conveyance in the neighborhood. Draft EIS Section 3.15.2 identifies impacts to the sewer and stormwater system. The discussion identifies that many of the systems are at or nearing the end of their expected life. The future need to replace these facilities is not an impact associated with the proposal. The discussion notes that there will be increased demand on the sewer system, but that increased demand on stormwater capacity is not expected. Draft EIS Section 3.15.3 provides mitigation strategies for identified impacts of the proposal. Actions that would require a change to the City's Capital Facilities Plan are not identified in the mitigation strategies. Future review of the capital facilities needs in the neighborhood will be considered during the planned 2014 citywide Comprehensive Plan update.</p>
<p><b>26</b></p>	<p><b>Alternatives.</b> As described in Draft EIS Sections 2.2.5 and 2.3.7, the City identified the alternatives considered in the Draft EIS based on an extensive outreach process with the public and interested stakeholders. The alternatives defined through this process did not include an area-wide downzone. Such an alternative would not meet the objectives of the proposal, as listed in the Draft EIS.</p> <p>As noted in the responses to Comments 3 and 4 above, the proposal that is considered in the EIS is the potential use of incentive zoning as a strategy to achieve neighborhood plan goals and other public benefits. Such review does not require a citywide analysis of growth targets.</p> <p>As noted in the response to Comment 4 above, the No Action Alternative (Alternative 4) would maintain existing zoning without adoption of incentive zoning provisions.</p> <p>"Consideration of alternatives in a non-project EIS is limited. SMC 25.05.442."</p>
<p><b>27</b></p>	<p><b>Summary.</b> The comment is noted. Please see the responses to comments in this letter, above.</p>
<p><b>Letter 13: Gemmel, Chris</b></p>	
<p><b>1</b></p>	<p><b>Additional Comments.</b> The comment is noted. Please see the comments and responses to Letter 12, above (Richard Aramburu, representing Lake Union Opportunity Alliance).</p>
<p><b>2</b></p>	<p><b>Transportation Comments.</b> The comment is noted. Please see the memo from CFA Consultants contained in this comment letter, including comments and responses 91 through 94.</p>
<p><b>3</b></p>	<p><b>Editing.</b> City of Seattle staff representing various key departments provided comprehensive review and comment regarding the preliminary Draft EIS and the document was thoroughly edited before the City authorized publication.</p>

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4	<p><b>Summary Section.</b> Please see revisions to the summary section in Chapter 1 of this Final EIS. The summary section is intended to be just that – an overview of the project and salient points with regard to impacts of the alternatives. It is not intended to serve as a exhaustive analysis of an environmental parameter. As noted at the beginning of the section, the information is intentionally brief and the reader is encouraged to refer to Chapters 2 and 3 for more detailed information. To the extent that quantitative data is available, the summary section attempts to incorporate such data. In other cases, the qualitative and comparative conclusions of the analyses are included.</p>
5	<p><b>Summary Section.</b> To the extent that quantitative data is available, the summary section attempts to incorporate such data. In other cases, the qualitative and comparative conclusions of the analyses are included.</p>
6	<p><b>EIS Contributors.</b> Please refer to page iv of the Fact Sheet at the front of the Draft EIS. The Fact Sheet lists the principal authors and contributors to technical analyses contained in this Draft EIS, together with the specific technical areas that each addressed. Each of the participants noted are professional firms and each have extensive experience conducting environmental review and technical analyses for project project-level development in the South Lake Union neighborhood. In addition, some firms have offices in the neighborhood. The City of Seattle has determined that there is no conflict of interest that would impact the team’s ability to provide objective analysis in the SEPA EIS.</p>
7	<p><b>Significant Unavoidable Adverse Impacts.</b> The referenced statement is a summary statement based on the analyses contained in the Chapter 3 of the Draft EIS and accurately represents the conclusions of the analyses as stated in the “Significant Unavoidable Adverse Impacts” section for each element of the environment. Please refer to the analysis of each element of the environment for a discussion of impacts, mitigation and significant unavoidable adverse impacts.</p>
8	<p><b>Shoreline Shading.</b> Although the proposal does not include any changes to land use designations in the designated shoreline areas, Appendix D of the Draft EIS shows the potential for shading along the Lake Union shoreline. Shadows are discussed in Draft EIS Section 3.10.9 and shading impacts to plants and animals are analyzed in Section 3.4.2. Consistency with the Shoreline Management Act will be considered by the City in determining the future policy and regulatory direction.</p>
9	<p><b>Growth Estimates.</b> The 2031 numbers discussed in Draft EIS Section 2.2 are not targets, but are estimates intended to provide additional context for</p>

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	<p>understanding potential long-term growth in South Lake Union. As noted in the discussion in this section, the estimate is for analysis purposes only and does not represent policy intent by the City. In order to disclose the potential range of capacity needed to meet a future growth target for South Lake Union, both 2024 and 2031 are considered in the analysis.</p> <p>In Section 3.8, additional discussion of the Seattle Comprehensive Plan Urban Village Element states that formal City action to establish a growth will occur in the future based on an analysis of the capacity of all of the urban centers and other areas of the City. Consistent with the Washington Growth Management Act, the South Lake Union 2031 growth target that is ultimately proposed and adopted by the City will reflect an understanding of overall development capacity.</p>
<p><b>10</b></p>	<p><b>Flight Path.</b> FAR Part 77 and associated flight path issues are primarily discussed in the Draft EIS Section 3.8, Land Use. Subsequent to issuance of the Draft EIS, additional review of the flight path was conducted (see Appendix F). This analysis included a review of how seaplane lanes are utilized (including runway utilization, flight tracks, and piloting techniques), an evaluation of the aircraft fleet used by floatplane operators, and documentation of the performance characteristics of the various floatplane aircraft. Several Federal Aviation Administration (FAA) and International Civil Aviation Organization (ICAO) planning documents that have applicability in the establishment of approach/departure protection boundaries for curving approach and departure procedures such as those used on Lake Union were also reviewed.</p> <p>Based on this analysis, and in coordination with WSDOT Aviation, a revised flight path was identified (see Section 3.2 of this Final EIS). This revised flight path differs from that shown in the Draft EIS in that portions are narrower than the previous flight path, the curvature is more gradual, and the east-west legs of the flight path have shifted slightly to the north. Specifically, the southern boundary has shifted 400-500 feet north so that the southern boundary lies north of Valley Street and is generally aligned with Broad Street. The southern boundary now crosses Aurora Avenue North at about Mercer Street. Similarly, the northern boundary of the flight path shifted 200-300 feet north, crossing the Lake Union shoreline at roughly Highland Drive and crossing Aurora Avenue just north of Ward Street. Please see Section 3.4 Aesthetics for revised images associated with the revised flight path.</p> <p>This programmatic analysis in Section 3.8 of the Draft EIS included a qualitative analysis of potential wind impacts. From a quantitative perspective, numerous factors will affect wind patterns in an urban area. The most critical of these are building heights, orientation, location and massing. At the subarea level of analysis, it is impossible to accurately forecast these actors for</p>

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	<p>all development in the subarea. Therefore, the programmatic analysis contained in the EIS describes a range of potential vertical and horizontal impact areas, depending on the type of development that may occur. At the same time, it is agreed that it is essential to conduct a quantitative wind analysis of individual development proposals to ensure that wind impacts on the Lake Union Seaport Airport are mitigated. Therefore, an additional mitigation measure requiring a project-level analysis of wind impacts for all new development above the base height permitted under the Seattle Mixed zoning is recommended. The approach to this analysis would include the following steps:</p> <ol style="list-style-type: none"> <li>1. Construct a physical scale model of the proposed project and/or the maximum building envelope allowed at that site, with the surrounding physical context (i.e., existing buildings, topography, etc.)</li> <li>2. Install the model into a boundary layer wind tunnel and measure velocities and turbulence levels along the prescribed flight path with and without the proposed project</li> <li>3. Test for prevailing wind directions and/or wind directions that are expected to have an impact on the flight path</li> <li>4. Present resulting data in a form to allow for quantitative comparison between existing and proposed conditions</li> <li>5. Provide a written report summarizing the methodology, results and interpretation of the results against any available published aviation standards for shear layers and turbulence levels. Analysis results would require interpretation by an aviation specialist who would assess the acceptability of these specific results for the aircraft actually used at this location.</li> </ol> <p>In addition, the City may consider requiring additional analysis to address the following questions:</p> <ul style="list-style-type: none"> <li>• Additional review to address potential future adjacent development (i.e., a future configuration which may augment or mitigate predicted impacts in the future)</li> <li>• Testing of mitigation schemes if the project results are unacceptable (i.e., the wind tunnel study could be then used to help define a height, size and location on that site that could be acceptable)</li> </ul>
<p><b>11</b></p>	<p><b>Aesthetics Summary.</b> The referenced row accurately provides a summarized description of potential maximum building heights under each alternative. The reader is referred to Draft EIS Chapter 2 for a more specific description of building heights under each alternative.</p>
<p><b>12</b></p>	<p><b>Housing Affordability.</b> Section 3.9.2, Housing, describes that incentive</p>

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	<p>zoning provisions, including developer financial contributions to affordable housing, may be used to achieve increased residential building heights. Through use of these incentives, the action alternatives may have the potential to result in an increased number of affordable units than the No Action Alternative.</p> <p>The discussion in Section 3.9.2 also states that there are a number of factors that impact the potential for affordable housing, including development costs, property values, market demand, individual property owner goals, and opportunities for financing affordable housing. Under any of the alternatives, these factors will affect the actual number of affordable units that are built in the neighborhood.</p>
13	<p><b>Housing Inventory.</b> Please see the revisions to the housing inventory data in Final EIS Section 3.3.</p>
14	<p><b>Shadow Studies.</b> There are no one-day shadow studies. All 15 shadow graphic figures are contained in Appendix D to the Draft EIS – Figures 29 through 41. As shown, they depict possible shadow impacts for each development alternative at 9 am, noon and 3 pm -- for each of the four key solar days of the year. Analysis contained in the Aesthetic Section, pages 3.10-81 through 3.10-88 provides a comprehensive discussion of shadow impacts. See also response to comment 38 below.</p>
15	<p><b>Lake Union Habitat Mitigation.</b> Please see Draft EIS Section 3.4.3, Plants and Animals, which contains proposed mitigation measures for plant and animal impacts.</p>
16	<p><b>Combined Sewer Overflows.</b> As described in the Draft EIS Combined Sewer Overflows (CSOs) are not a function of development density. The amount of storm water discharged from the area to the combined sewer system is a function of the area of the basin and the amount of rainfall in a given storm, neither of which will change in these development scenarios. There is no baseline CSO volume for this area and review of King County annual reports for Combined Sewer Overflows reveals no patterns to the size and frequency of overflow events.</p> <p>Under current stormwater regulations, the stormwater load on the public sewers will likely be reduced by redevelopment. New development will be required to provide stormwater flow control in the area collected by the Combined Sewer. Flow control systems can take the form of Green Infrastructure (green roof, rain gardens, cisterns, etc.), or conventional underground tanks, or a combination of systems. Whichever system is used, these methods will hold collected storm water on-site longer, allowing the public piped system to flow at lower volumes, reducing the likelihood of a</p>

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	CSO. Each individual redeveloped site that is over 10,000 sf will be required to reduce the peak flow rates from the site to approximately 25% of the uncontrolled flow rates. The existing, older, development in this area generally has no on-site flow control facilities.
17	<p><b>Wind Impacts on Recreational Sailing.</b> The City issued the Scoping Notice for this Draft EIS on November 18, 2008 and invited comments on the EIS scope through December 18, 2008. Through 2009, the City worked with neighborhood stakeholders to address concerns raised by the scoping comments. Based on this process, the City revised the EIS alternatives and finalized the scope of the EIS.</p> <p>The potential wind wake impact on recreational sailing was not included as part of the Final EIS scope.</p>
18	<p><b>Building Bulk.</b> Please refer to the discussion in Draft EIS Section 3.8, which discusses height, bulk and scale of the action alternatives. This section also includes visual models of the neighborhood as a whole and at street level, assuming the proposed floor plate sizes.</p>
19	<p><b>Floor Plate and Lot Size.</b> In the Draft EIS (Table 2-3), the floor plate size establishes a maximum limit and the lot size establishes a minimum limit. It is acknowledged that floor plate size would not exceed lot size.</p>
20	<p><b>Land Use Patterns.</b> The scope of review established for the South Lake Union EIS states that no land use compatibility issues are expected to result from the proposal that are not already possible under current zoning. The scope states that the land use analysis will focus on a plans and policies analysis, including policies related to the flight path. Please see the Draft EIS Section 3.8, Land Use, for this discussion.</p>
21	<p><b>Aesthetics Analysis.</b> Please see responses to Comments 38 through 42 and 59 in this letter and revisions to the aesthetics analysis in this Final EIS (Section 3.4).</p>
22	<p><b>Transportation Analysis.</b> Please see the transportation section methodology that is described in Section 3.13 of the EIS and response to Comments 93 and 94 in this letter. The recommended mitigating measures are based on existing plans and adopted City of Seattle projects.</p>
23	<p><b>Air Quality Analysis.</b> Regarding the adequacy of the transportation analysis methodology, please see response to Comments 93 and 94 in this letter.</p>
24	<p><b>Significant Unavoidable Adverse Impacts.</b> Comments #24 through 54 are based on Section I of the Draft EIS – the Summary. As noted, the summary is</p>

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	<p>just that ... a synopsis of the impact discussion that is contained in Chapter 3 of the Draft EIS. Analysis is the focus of Chapter 3.</p> <p>The statement that is referenced in this comment is a summary based on the analyses contained in Chapter 3 of the Draft EIS. As such, it accurately represents the conclusions of the analyses as stated in the "Significant Unavoidable Adverse Impacts" section for each element of the environment. Please refer to the analysis of each element of the environment for a discussion of impacts, mitigation and significant unavoidable adverse impacts.</p>
25	<p><b>Growth Estimates.</b> The 2031 numbers that are discussed in Section 2.2 of the Draft EIS are not targets, but are estimates that are intended to provide additional context for understanding potential long-term growth in South Lake Union. As noted in the discussion in this section, the estimate is for analysis purposes only and does not represent policy intent by the City. In order to disclose the potential range of capacity needed to meet a future growth target for South Lake Union, both 2024 and 2031 are considered in the analysis.</p> <p>In Draft EIS Section 3.8, additional discussion of the Seattle Comprehensive Plan Urban Village Element states that formal City action to establish a growth will occur in the future based on an analysis of the capacity of all of the urban centers and other areas of the City. Consistent with the Washington Growth Management Act, the South Lake Union 2031 growth target that is ultimately proposed and adopted by the City will reflect an understanding of overall development capacity.</p>
26	<p><b>Distance Between Towers.</b> The comment regarding an absolute distance between towers is noted. The Draft EIS visual analysis assumes a variety of tower distances, depending on the location of existing structures and lot configurations. In some cases, towers were assumed to be as close as 20 feet apart.</p>
27	<p><b>Flight Path Safety Buffer.</b> The comment is noted. This programmatic EIS included a qualitative analysis of potential wind impacts. From a quantitative perspective, numerous factors will affect wind patterns in an urban area. The most critical of these are building heights, location, orientation, and massing. At the subarea level of analysis, it is impossible to accurately forecast these factors for all development in the subarea. Therefore, the programmatic analysis that is contained in the EIS describes a range of potential vertical and horizontal impact areas, depending on the type of development that may occur.</p> <p>This programmatic analysis in Section 3.8 of the Draft EIS included a qualitative analysis of potential wind impacts. From a quantitative perspective,</p>

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	<p>numerous factors will affect wind patterns in an urban area. The most critical of these are building heights, orientation, location and massing. At the subarea level of analysis, it is impossible to accurately forecast these actors for all development in the subarea. Therefore, the programmatic analysis contained in the EIS describes a range of potential vertical and horizontal impact areas, depending on the type of development that may occur. At the same time, it is agreed that it is essential to conduct a quantitative wind analysis of individual development proposals to ensure that wind impacts on the Lake Union Seaport Airport are mitigated. Therefore, an additional mitigation measure requiring a project-level analysis of wind impacts for all new development above the base height permitted under the Seattle Mixed zoning is recommended. The approach to this analysis would include the following steps:</p> <ol style="list-style-type: none"> <li>1. Construct a physical scale model of the proposed project and/or the maximum building envelope allowed at that site, with the surrounding physical context (i.e., existing buildings, topography, etc.)</li> <li>2. Install the model into a boundary layer wind tunnel and measure velocities and turbulence levels along the prescribed flight path with and without the proposed project</li> <li>3. Test for prevailing wind directions and/or wind directions that are expected to have an impact on the flight path</li> <li>4. Present resulting data in a form to allow for quantitative comparison between existing and proposed conditions</li> <li>5. Provide a written report summarizing the methodology, results and interpretation of the results against any available published aviation standards for shear layers and turbulence levels. Analysis results would require interpretation by an aviation specialist who would assess the acceptability of these specific results for the aircraft actually used at this location.</li> </ol> <p>In addition, the City may consider requiring additional analysis to address the following questions:</p> <ul style="list-style-type: none"> <li>• Additional review to address potential future adjacent development (i.e., a future configuration which may augment or mitigate predicted impacts in the future)</li> <li>• Testing of mitigation schemes if the project results are unacceptable (i.e., the wind tunnel study could be then used to help define a height, size and location on that site that could be acceptable)</li> </ul>
28	<p><b>Wind Analysis.</b> The comments are noted. Please see response to Comment 27 in this letter, above. As noted in the response to Comment 17 above, the potential wind wake impact on recreational sailing on was not specifically</p>

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	addressed as part of the scope of this EIS.
29	<p><b>Flight Path.</b> With winds from the south, outbound flights taxi north on Lake Union, turn and head south into the wind adhering to the flight path that is depicted in Section 3.2 of this Final EIS as much as possible. Once airborne, as soon as safety permits, aircraft turn west toward Elliott Bay. The flight path that is referred to in this comment is located near the southeast portion of Lake Union, and is used for inbound aircraft when wind conditions are from the north. Proposed building heights are not a constraint to aviation in this area.</p>
30	<p><b>Noise Impacts.</b> The comment is noted. The comment refers to a summary statement in Chapter 1 of the Draft EIS; additional discussion is provided in Draft EIS Section 3.6, Noise.</p> <p>Draft EIS Section 3.6 cites the Seattle Municipal Code 25.08.530, which exempts aircraft in flight from maximum permissible sound levels. As described in the noise analysis, increased building heights near the flight path could result in increased noise impacts to residences and/or offices in upper portions of new buildings as a result of aircraft overflights. However, as noted, while sounds from seaplane operations may on occasion be a nuisance to some, such sound levels remain exempt from Seattle’s Noise Code.</p>
31	<p><b>Step Down Benefits.</b> The alternatives described in the Draft EIS are based on public input and comment, but do not incorporate formal or de facto City of Seattle policy related to the concept of “step down.”</p>
32	<p><b>Aesthetics Summary.</b> The referenced row accurately provides a summarized description of maximum building heights under each alternative. Please refer to Draft EIS Chapter 2 for a more specific description of building heights under each alternative.</p>
33	<p><b>Wind Analysis.</b> This programmatic EIS included a qualitative analysis of potential wind impacts. From a quantitative perspective, numerous factors will affect wind patterns in an urban area. The most critical of these are building heights, orientation, location and massing. At the subarea level of analysis, it is impossible to accurately forecast these actors for all development in the subarea. Therefore, the programmatic analysis contained in the EIS describes a range of potential vertical and horizontal impact areas, depending on the type of development that may occur. At the same time, it is agreed that it is essential to conduct a quantitative wind analysis of individual development proposals to ensure that wind impacts on the Lake Union Seaport Airport are mitigated. Therefore, an additional mitigation measure requiring a project-level analysis of wind impacts for all new development above the base height</p>

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	<p>permitted under the Seattle Mixed zoning is recommended The approach to this analysis would include the following steps:</p> <ol style="list-style-type: none"> <li>1. Construct a physical scale model of the proposed project and/or the maximum building envelope allowed at that site, with the surrounding physical context (i.e., existing buildings, topography, etc.)</li> <li>2. Install the model into a boundary layer wind tunnel and measure velocities and turbulence levels along the prescribed flight path with and without the proposed project</li> <li>3. Test for prevailing wind directions and/or wind directions that are expected to have an impact on the flight path</li> <li>4. Present resulting data in a form to allow for quantitative comparison between existing and proposed conditions</li> <li>5. Provide a written report summarizing the methodology, results and interpretation of the results against any available published aviation standards for shear layers and turbulence levels. Analysis results would require interpretation by an aviation specialist who would assess the acceptability of these specific results for the aircraft actually used at this location.</li> </ol> <p>In addition, the City may consider requiring additional analysis to address the following questions:</p> <ul style="list-style-type: none"> <li>• Additional review to address potential future adjacent development (i.e., a future configuration which may augment or mitigate predicted impacts in the future)</li> <li>• Testing of mitigation schemes if the project results are unacceptable (i.e., the wind tunnel study could be then used to help define a height, size and location on that site that could be acceptable)</li> </ul> <p>As noted in the response to Comment 17 above, the potential wind wake impact on recreational sailing on was not included as part of the Final EIS scope.</p>
34	<p><b>Step Down Zoning.</b> The alternatives described in the Draft EIS are based on public input and comment, but do not incorporate formal or de facto City of Seattle policy related to the concept of "step down."</p>
35	<p><b>Cascade Neighborhood.</b> The comment is noted.</p>
36	<p><b>Affordable Housing.</b> The comment refers to a summary statement in Chapter 1 of the Draft EIS. The commenter is encouraged to review the more-detailed analyses contained in Chapter 3.9 of the Draft EIS, specifically:</p> <ul style="list-style-type: none"> <li>• Draft EIS Section 3.9.2, Housing, describes that incentive zoning provisions, including developer financial contributions to affordable housing, may be</li> </ul>

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	<p>used to achieve increased residential building heights. Through use of these incentives, the action alternatives may have the potential to result in an increased number of affordable units than the No Action Alternative.</p> <ul style="list-style-type: none"> <li>The discussion in Section 3.9.2 also states that there are a number of factors that impact the potential for affordable housing, including development costs, property values, market demand, individual property owner goals, and opportunities for financing affordable housing. Under any of the alternatives, these factors will affect the actual number of affordable units that are built in the neighborhood.</li> </ul>
<p><b>37</b></p>	<p><b>Schools, Parks, and Housing.</b> Draft EIS Section 3.9, Housing, provides a discussion of housing affordability. This section also contains a brief discussion of the residential character in South Lake Union, but does not quantify school demand. Please refer to Final EIS Section 3.6 for a discussion of potential school-related impacts.</p> <p>Draft EIS Section 3.16, Open Space and Recreation, provides an analysis of park and open space impacts associated with each alternative.</p>
<p><b>38</b></p>	<p><b>Building Height, Bulk and Scale.</b> Draft EIS Section 3.10, Aesthetics, addresses building height, bulk and scale. The analysis includes street level views of buildings with unornamented facades.</p>
<p><b>39</b></p>	<p><b>Building Height and Bulk.</b> This comment refers to a summary statement in Chapter 1 of the Draft EIS. Please refer to the Draft EIS Chapter 3.10, Aesthetics for the detailed discussion of impacts associated with neighborhood character and building bulk and scale.</p>
<p><b>40</b></p>	<p><b>Aesthetics Summary.</b> This comment refers to a summary statement in Chapter 1 of the Draft EIS. Draft EIS Chapter 3.10, Aesthetics, is the detailed discussion of view impacts. The views analyzed in Section 3.10 include viewpoints designated by SMC 25.05.675.P, additional locations in and near the neighborhood that provide public or quasi-public views of the neighborhood, and designated scenic routes. As shown in Draft EIS Figure 3.10.22, a total of fifteen viewpoint locations were analyzed.</p>
<p><b>41</b></p>	<p><b>Aesthetics Viewsheds Summary.</b> Draft EIS page 1-18 is a summarized statement of view-related impacts. The full discussion of viewshed impacts -- including impacts to scenic routes -- is contained in Draft EIS Section 3.10-5 through 3.10-8 and additional views are shown in Appendix D of the Draft EIS.</p> <p>As established by the final scope for the EIS, the views that are analyzed in Section 3.10 include viewpoints designated by SMC 25.05.675.P, additional locations in and near the neighborhood that provide public or quasi-public views of the neighborhood, and designated scenic routes. As shown in Draft</p>

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	EIS Figure 3.10.22, a total of fifteen viewpoint locations were analyzed.
42	<p><b>Viewpoints.</b> The comment refers to a summary statement in Chapter 1 of the Draft EIS. Chapter 3.10, Aesthetics, is the detailed discussion of view-related impacts. As established by the final scope for the EIS, the views analyzed in Section 3.10 include viewpoints designated by SMC 25.05.675.P, additional locations in and near the neighborhood that provide public or quasi-public views of the neighborhood, and designated scenic routes. As shown in Draft EIS Figure 3.10.22, a total of fifteen viewpoint locations were analyzed.</p> <p>The comment refers to the proposal as an area rezone. It should be noted that under any of the action alternatives, the only area that would be rezoned is the existing Industrial Commercial (IC) designation, which would be rezoned to Seattle Mixed Use. This change in zoning designation is intended to establish consistency with the surrounding neighborhood and is not related to the proposal for increased height. The remainder of the neighborhood would retain existing underlying zoning designations with the potential for increased building height through the use of incentive zoning. The City is considering the use of incentive zoning to link code flexibility, increased density and development potential with public benefits valued by the community. Please see the discussion of incentives in Section 2.3.2 of the Draft EIS.</p>
43	<p><b>Shadow Analysis.</b> The comment refers to the summarized statement of shadow impacts. The full discussion of shadow impacts of each alternative on neighborhood parks, including Lake Union Park, can be found in the Aesthetic Shadows section (3.10.9 – 3.10.12). See also Appendix D for diagrams of shadow impacts associated with each alternative based on three times of the day on each of the key solar days of the year – vernal equinox, summer solstice, autumnal equinox and winter solstice.</p> <p>This programmatic analysis does not quantify shadow impacts by square footage. Such an analysis could be provided as part of project-level SEPA review in conjunction with specific development proposals.</p>
44	<p><b>Shadow Impacts on Plants and Animals.</b> The comment refers to the Chapter 1 summary of mitigating measures. The Draft EIS Section 3.4 must be reviewed for the comprehensive analysis of shadow impacts on plants.</p>
45	<p><b>Shadow Mitigation Strategies.</b> Draft EIS Section 3.10.10 contains a complete discussion of potential shadow impacts. In addition, comprehensive shadow diagrams are contained in the Draft EIS, Appendix D. Section 3.10.11 of the Draft EIS states that as part of a site-specific development proposal, a detailed shadow analysis should be performed relative to any development that could affect Denny Park, Cascade Playground, or Lake Union Park, consistent with Seattle SEPA policies. The measures listed in SMC 25.05.75A2e provide</p>

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	measures to mitigate adverse shadow impacts identified at the site-specific level.
46	<p><b>Wind Wake Impacts.</b> The comment is noted. This programmatic EIS included a qualitative analysis of potential wind impacts. From a quantitative perspective, numerous factors will affect wind patterns in an urban area. The most critical of these are building heights, orientation, location and massing. At the subarea level of analysis, it is impossible to accurately forecast these actors for all development in the subarea. Therefore, the programmatic analysis contained in the EIS describes a range of potential vertical and horizontal impact areas, depending on the type of development that may occur. At the same time, it is agreed that it is essential to conduct a quantitative wind analysis of individual development proposals to ensure that wind impacts on the Lake Union Seaport Airport are mitigated. Therefore, an additional mitigation measure requiring a project-level analysis of wind impacts for all new development above the base height permitted under the Seattle Mixed zoning is recommended. The approach to this analysis would include the following steps:</p> <ol style="list-style-type: none"> <li>1. Construct a physical scale model of the proposed project and/or the maximum building envelope allowed at that site, with the surrounding physical context (i.e., existing buildings, topography, etc.)</li> <li>2. Install the model into a boundary layer wind tunnel and measure velocities and turbulence levels along the prescribed flight path with and without the proposed project</li> <li>3. Test for prevailing wind directions and/or wind directions that are expected to have an impact on the flight path</li> <li>4. Present resulting data in a form to allow for quantitative comparison between existing and proposed conditions</li> <li>5. Provide a written report summarizing the methodology, results and interpretation of the results against any available published aviation standards for shear layers and turbulence levels. Analysis results would require interpretation by an aviation specialist who would assess the acceptability of these specific results for the aircraft actually used at this location.</li> </ol> <p>In addition, the City may consider requiring additional analysis to address the following questions:</p> <ul style="list-style-type: none"> <li>• Additional review to address potential future adjacent development (i.e., a future configuration which may augment or mitigate predicted impacts in the future)</li> <li>• Testing of mitigation schemes if the project results are unacceptable (i.e., the wind tunnel study could be then used to help define a height, size</li> </ul>

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	and location on that site that could be acceptable)
47	<b>Shadows on Lake Union Park.</b> Please see response to Comment 43, above.
48	<b>Wind Impacts on Recreational Sailing.</b> Please see response to Comment 17, above.
49	<b>Limit Building Heights.</b> The comment is noted. Please see responses to Comments 31 through 34 above.
50	<b>Liquefaction.</b> As stated in Draft EIS Section 3.1.3, depending on the nature of future site-specific development, mitigation may be necessary to address site-specific impacts of development under any of the alternatives. While liquefiable soil would need to be considered in design and construction, the presence of liquefiable soil does not necessarily limit building mass. Building design or site preparation can address potential liquefaction hazards. Potential site-specific mitigation measures are mentioned in Section 3.1.3 and would be considered in detail as part of a site-specific environmental review process.
51	<b>Underground Construction.</b> It would be inaccurate to state that the presence of shallow groundwater limits underground construction to one floor. While it may increase cost, groundwater conditions could be managed at the building site (via dewatering or lining) so that deeper construction would be possible.
52	<b>Building Heights and Growth Estimates.</b> The comment is noted. Please see response to Comment 25 above.
53	<p><b>Limit Building Heights.</b> The comments are noted. Please see the discussion of steep slopes in the Draft EIS Section 3.1. Also, please see the description of the revised flight path in Final EIS Chapter 2 and Section 3.2 of this Final EIS, as well as the response to Comment 10 in this letter ( above).</p> <p>As noted in the response to Comment 17, the potential wind impact to sailboats on Lake Union was not included as part of the EIS scope and has not been fully analyzed.</p> <p>For responses to comments under “Step Down” in this letter, please see responses to comments 31 through 34.</p> <p>Visual simulations from Bhy Kracke Park, which is located on the southeast side of Queen Anne Hill, help inform potential view-related impacts from this SEPA-designated viewpoint and are described in Section 3.10 of the Draft EIS.</p>
54	<b>Summary Section.</b> Please see revisions to the Summary section in Chapter 1 of this Final EIS. The summary section is intended to be just that – an overview of the project and salient points with regard to impacts of the alternatives. As noted at the beginning of the section, the information is intentionally brief

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	<p>and the reader is encouraged to refer to Chapters 2 and 3 for more detailed information. To the extent that quantitative data is available, the summary section attempts to incorporate such data. In other cases, the qualitative and comparative conclusions of the analyses are included.</p>
55	<p><b>Floor Plate and Lot Size.</b> In the Draft EIS Table 2-3, the floor plate size establishes a maximum area and lot size establishes a minimum area. Redevelopment assumptions are described in Section 3.10.2 of the Draft EIS. For redevelopment sites that are less than 24,000 square feet, it was presumed that the estimated floor plate size would match lot size.</p>
56	<p><b>Mix of Uses.</b> The comment regarding the mix of uses in the neighborhood is noted. Overall, residential development -- under all of the action alternatives - - would have the potential to achieve greater building height than office development, which is intended to serve as an incentive for increased residential development in this area, particularly under Alternative 3. As described in Section 2.3.5, Alternative 3 focuses potential height increases on residential uses and retains existing maximum building heights for office uses in much of the neighborhood.</p>
57	<p><b>Affordable Housing.</b> Draft EIS Section 3.9.2, Housing, describes that incentive zoning provisions, including developer financial contributions to affordable housing, may be used to achieve increased residential building heights. Through use of these incentives, the action alternatives may have the potential to result in an increased number of affordable units than the No Action Alternative.</p> <p>The discussion in Section 3.9.2 also states that there are a number of factors that impact the potential for affordable housing, including development costs, property values, market demand, individual property owner goals, and opportunities for financing affordable housing. Under any of the alternatives, these factors will affect the actual number of affordable units that are built in the neighborhood.</p>
58	<p><b>Urban Densities and Potential Transit Service.</b> The comment questions the findings of the transportation analysis because of a perceived lack of existing and future transit service in the area. The results of the transportation analysis, with respect to mode split, are not dissimilar to other neighborhoods in the area. Capitol Hill, for example, has the highest residential population densities in the City (based on US Census Bureau data) and achieves mode shares of 25 percent transit and 42 percent walk/bike for commute trips. Capitol Hill's mode shares occur in an area with similar transit characteristics that are similar to those expected in South Lake Union (no light rail, no BRT). Note that existing transit use and walk/bike mode share in Capitol Hill are considerably</p>

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	<p>higher than what is forecast for South Lake Union under 2031 conditions. Given these existing conditions results, the future mode share forecasts for South Lake Union are reasonable.</p>
<p><b>59</b></p>	<p><b>Aesthetics Figures.</b> The commenter provides specific comments and questions related to the figures in Draft EIS Section 3.10 and Appendix D. Based on a review of this comment, figures have been revised and are included in Final EIS Section 3.4. These revisions are to ensure that all figures are as technically accurate as possible, but do not change the overall analysis or conclusions of the aesthetics section of the Draft EIS.</p> <p><b>Figure 3.10-2 Full Build-out.</b> Please see the development assumptions described in Draft EIS Section 3.10.2. Where two towers are likely to be constructed, they have been included in the model. However, several of the blocks immediately south of the Mercer blocks were recently constructed and were assumed as unlikely to be redeveloped during the study timeframe. Other areas were assumed to be prime sites for future commercial or bio-tech, rather than residential development. These sites maximize FAR but not necessarily the height limit. Still other sites in this zone are smaller than the minimum lot size of 22,000 SF, so are shown as existing or built to the underlying zoning. See Final EIS Section 3.4 Figures 3.4-2 thru 3.4-9 for a color coded diagram of development assumptions for each block.</p> <p>The comment regarding the podiums on the Mercer blocks is correct. There was an error in the way the podiums were shown, which resulted in a larger building bulk than would be allowed by zoning. This has been corrected in the Final EIS and is shown in Section 3.4.</p> <p>Since mitigation measures had not yet been determined, Alternative 1 (the worst case condition in terms of shadows and potential view blockage), was shown with towers on the north side of the Mercer blocks adjacent to South Lake Union Park. See Final EIS Section 3.4.</p> <p><b>Figures 3.10-4 and -6 Full Build Out.</b> The comment regarding the podiums on the Mercer blocks is correct. There was an error in the way the podiums were shown, which resulted in a larger building bulk than would be allowed by zoning. This has been corrected in the Final EIS and is shown in Section 3.4.</p> <p><b>Figure 3.10-8 Full Build Out.</b> Per Seattle Municipal Code section 23.48.010C, maximum structure height may be increased from forty (40) feet to sixty-five (65) feet within the area bounded by Valley and Mercer Streets and Westlake and Fairview Avenues North as a special exception. This exception includes a requirement that a minimum of twenty (20) percent of the total development area must be provided as useable open space at street level and that the useable open space must be directly accessible to the public during the hours</p>

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	<p>of operation of South Lake Union Park. This exception was used for the model since it provided the worst case condition in terms of shadows and potential view blockage.</p> <p><b>Street-level views.</b> Please advise regarding use of figures and cars to provide scale.</p> <p><b>Figure 3.10-12.</b> The referenced figure has been corrected and is shown in Final EIS Section 3.4. No setback policy or mitigation was assumed in the Draft EIS analysis. As noted in the discussion of Figure 3.10-2 Full Build Out, above, Alternative 1 (the worst case condition in terms of shadows and potential view blockage), was shown with towers on the north side of the Mercer blocks adjacent to South Lake Union Park. See Final EIS Section 3.4.</p> <p><b>Figure 4.10-13.</b> Final EIS Section 3.4 shows the revised podium height at mid-block.</p> <p><b>Figure 3.10-14.</b> The podium heights of these images in the Draft EIS are correct. Although the floor lines provided for scale purposes are somewhat obscured by the building shading, the podium in Figure 3.10.11 is shown as three residential stories or thirty (30) feet, and the podium in Figure 3.10.14 is shown as 4 residential stories or forty-five (45) feet.</p> <p><b>Figure 3.10-15.</b> There was an error in the model, which resulted in a larger building bulk than would be allowed by zoning under Alternative 2. Final EIS Section 3.4 contains the corrected image. Please see the response Figure 3.10-12 regarding the location of towers on the Mercer blocks.</p> <p><b>Figure 3.10-18.</b> Please see Final EIS Section 3.4 for the corrected image.</p> <p><b>Figure 3.10-21.</b> See the response under Figure 3.10-8 above.</p> <p><b>Figure 3.10-25.</b> The building on the left is a 12 story commercial structure that maximizes the allowed height of 160 ft. for the project type. The podium in the foreground is assumed to be contiguous with the commercial tower and is shown at 65' in height, the maximum allowed.</p> <p><b>Figure 3.10-27.</b> Please see Final EIS Section 3.4 for the corrected figure. A commercial structure was assumed to be the most likely building constructed on this half-block site with residential on the western half of the block. The height limit for commercial in Alternative 1 is 240 ft. in this location. The study indicated that FAR will control rather than height on most commercial sites.</p> <p><b>Figure 3.10-49.</b> A commercial structure was assumed to be the most likely building constructed on this half-block site with residential on the western half of the block facing Denny Park. While the height limit is 125 ft. for both residential and commercial in Alternative 4 at this location, the study indicated that Floor Area Ratio (FAR) will control rather than height. This image assumes</p>

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	<p>a building constructed from property line to property to the maximum FAR allowed.</p> <p><b>Appendix D, Figure 1.</b> An image from an earlier version of the 3-D model was inserted in the Draft EIS. In addition, two towers were shown in the model rather than one, which resulted in a larger building bulk than would be allowed by zoning. A corrected figure is shown in Final EIS Section 3.4.</p> <p><b>Appendix D, Figures 2 and 3.</b> Two towers were shown in the model rather than one, which resulted in a larger building bulk than would be allowed by zoning. Corrected figures are shown in Final EIS Section 3.4.</p> <p><b>Appendix to, Figure 4.</b> See response under Figure 3.10-8 above. A corrected figure is shown in Final EIS Section 3.4.</p> <p><b>Appendix D, Figure 20.</b> Building heights for the Fred Hutchinson Campus in Alternative 4 have been corrected in Final EIS Section 3.4.</p> <p><b>Appendix D, Figure 25.</b> The 3-D computer model includes the new Amazon buildings (see shadow studies). However, Google Earth, which was used to provide the greater context for the view studies, did not include the newest and tallest Amazon structures. The differences have been reconciled by adding the recently completed Amazon buildings to all four zoning overlays and updating the views, see Final EIS Section 3.4.</p> <p><b>Appendix D, Figure 29.</b> Comment noted. Due to the large volume of images in this section, shadow images are retained in Appendix D.</p>
60	<b>Visual Model.</b> Comment noted..
61	<p><b>Impacts on Thomas Street.</b> Traffic congestion associated with the proposed height and density increases were assessed using traffic assignments from the City of Seattle Travel Model. This tool is widely regarded as an accurate tool to evaluate existing and future traffic congestion patterns and has been validated to match existing traffic conditions. Based on the results of the Seattle Travel Model, there is no anticipated impact on Thomas Street. It should be noted that under existing conditions, the significant congestion on Denny Way (LOS F) and Mercer/Valley Streets (LOS E-F) does not cause the adjacent streets of Republican, Harrison, or Thomas to experience substantial traffic congestion. This is because these smaller streets do not provide access to the freeway or other neighborhoods. This pattern is expected to continue into the future.</p>
62	<p><b>Trip Generation Estimates.</b> As described by the commenter's traffic study, the trip generation estimates in the Draft EIS appear reasonable. Appendix E describes how the MXD model used in the analysis has been validated to a variety of existing data and has been shown to have superior statistical validity</p>

Comment Number	Response
	when compared to more traditional analysis techniques.
63	<b>MXD Model Validation.</b> The commenter states an opinion that the validation results presented in Appendix E are not applicable to South Lake Union. The research that was prepared to develop the MXD model has been submitted to and accepted by several peer-reviewed academic journals and deemed to be adequately rigorous. While the commenter may disagree with the interpretation of the statistical results, the data presented in Appendix E nevertheless demonstrates that the alternative methods of analysis are less accurate and would be less appropriate in this EIS.
64	<b>Effectiveness of Mitigation.</b> The commenter disagrees with the Draft EIS assessment of trip generation reductions associated with the proposed mitigation measures. The basis for this disagreement is unclear. The mitigation measure trip reductions are based on empirical research as cited on Draft EIS page 3.13-82.
65	<b>Bicycle and Pedestrian Mitigation.</b> A substantial body of research has shown that improved bicycle and pedestrian conditions are correlated with reduced trip generation. The information the commenter provided about existing parking demand and traffic congestion is noted, but does not change the findings of the Draft EIS.
66	<b>Transit Service Mitigation.</b> It is true that the current funding picture for King County Metro is bleak and that there is the potential for near-term reductions in transit service. However, the Draft EIS is a forward-looking document and assumes the regionally accepted levels of future transit, as directed by the Seattle Department of Transportation and defined by the Puget Sound Regional Council. It should be noted what while transit funding fluctuates on the short-run, transit funding and service over the last 20 years has expanded substantially in the Puget Sound Region.
67	<b>Mitigation Measure Implementation.</b> Please see response to Comment 15, Letter 12.
68	<b>Transportation Analysis Level of Detail.</b> The Draft EIS clearly defines the existing conditions for traffic congestion, transit, and bicycle/pedestrian travel. The most accurate trip generation methodology available was used to estimate trip generation and potential "with action" transportation impacts, as well as a series of mitigation measures to reduce the significance of the impacts. The final conclusion of the Draft EIS is that there will be significant and unavoidable transportation impacts as a result of the height and density increase.

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69	<p><b>Ozone Analysis.</b> As indicated in the Draft EIS and reiterated in the comment, ozone problems are indeed regional in nature and potential ozone impacts are not considered on a project-level basis as part of air quality impact assessments. Because ozone is not emitted directly, and due to the complexity of evaluating ozone formation and transport, there are, in fact, no means of estimating or characterizing ozone impacts associated with individual projects. Instead, regional ozone issues are addressed using regional modeling tools and planning. At this point, while the Puget Sound region is not considered out of attainment for ozone, there are no applicable requirements nor any effective mechanisms for assessing the effects of specific projects on regional ozone levels.</p>
70	<p><b>Carbon Monoxide Analysis.</b> As described in the Draft EIS, carbon monoxide (CO) is used as an indicator of potential air quality issues related to transportation sources. EPA guidance indicates CO assessments that consider conditions at up to the three of the most project-affected intersections are adequate for evaluating potential impacts. This was the approach used in the air quality analysis that is contained in the Draft EIS. Conversely, the potential for air quality impacts at all other less-affected locations would be lower than indicated by this worst-case evaluation. Consequently, no additional analysis is necessary or warranted.</p> <p>It is also worth noting that trends in CO concentrations in the Puget Sound region have been downward for many years. As stated in the Draft EIS, there have been no measured violations of the CO standards in many years, and the former CO problem is thought to have been resolved. It is, therefore, highly unlikely that project-related traffic would result in any CO issues at any affected intersections in the project area. Currently, the focus of EPA and other air quality agencies is turning towards other transportation-related pollutant emissions such as NO<sup>2</sup>, fine particulate matter, and other substances emitted in engine exhaust. But there are as yet no requirements or guidelines for assessing such emissions or resulting concentrations -- and air quality monitoring has not detected any problems with these pollutants in the Puget Sound region, except as discussed in the Draft EIS.</p>
71	<p><b>Analysis Methodology.</b> The meaning of the comment that "the Draft EIS seems to be using the most aggressive methods of analysis to come to the most optimistic result" is unclear. The use of "worst-case" scenarios is a standard practice in analyses of potential environmental impacts, and this approach was used in the review of the air quality implications of project-related traffic. This sort of review was accomplished based on consideration of peak-hour traffic conditions with air quality modeling using the CAL3QHC model (EPA 1995) and the WASIST intersection screening tool (WSDOT 2009).</p>

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	<p>These tools are deliberately conservative in estimating emissions and dispersion conditions. Results produced using these tools thus represent conservative approximations of potential air pollutant concentrations. Because project-level modeling assuming worst-case congestion conditions indicated traffic-related emissions would not result in air quality problems, no significant air quality impacts would be anticipated.</p>
<p><b>72</b></p>	<p><b>EIS Contributors.</b> Please refer to page iv of the Fact Sheet at the front of the Draft EIS. The Fact Sheet lists the principal authors and contributors to technical analyses contained in this Draft EIS, together with the specific technical areas that each addressed. Each of the participants noted are professional firms and each have extensive experience conducting environmental review and technical analyses for project project-level development in the South Lake Union neighborhood. In addition, some firms have offices in the neighborhood. The City of Seattle has determined that there is no conflict of interest that would impact the team’s ability to provide objective analysis in the SEPA EIS.</p>
<p><b>73</b></p>	<p><b>Shoreline Shading.</b> Although the proposal does not included any changes to land use designations in the designated shoreline areas, Draft EIS Appendix D shows the potential for shading along the Lake Union shoreline. Shadows are discussed in Draft EIS Section 3.10.9 and shading impacts to plants and animals are noted in Section 3.4.2. Additional analysis regarding consistency with provisions of Seattle’s Shoreline Master Program is provided in Section 3.2 of this Final EIS. These considerations will be addressed by the City in determining future policy and regulatory direction for the area.</p>
<p><b>74</b></p>	<p><b>Lake Union Habitat Mitigation.</b> Please see Draft EIS Section 3.4.3, Plants and Animals, which contains proposed mitigation measures for plant and animal impacts.</p>
<p><b>75</b></p>	<p><b>Combined Sewer Overflows (CSO).</b> Please see response to Comment 16 in this letter.</p> <p>Regarding additional outfalls from CSOs, the City of Seattle and King County are working together to reduce the number of CSO events through improvements to city and county sewer systems in this area. Planning and implementation of these improvements is unrelated, however, to the South Lake Union proposal and additional CSOs are not anticipated to be needed as a result of the proposal.</p> <p>The volume of sediment that is discharged from this area is not expected to be impacted by the proposal. Regardless of the alternative, future project-level review will establish construction and operational measures to control the</p>

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	<p>amount of sediment leaving a given site.</p> <p>At a programmatic level of environmental review, sewer and stormwater impacts are not quantified. However, it is expected that, based on current stormwater regulations, the stormwater load on public sewers will likely be reduced by redevelopment. This is a result of providing more efficient sewer and stormwater water control systems, compared to existing older systems.</p>
<p><b>76</b></p>	<p><b>Air and Water Navigation on Lake Union.</b> Draft EIS Section 3.8 provides a programmatic analysis of wind-related impacts on air navigation. From a quantitative perspective, numerous factors will affect wind patterns in an urban area. The most critical of these are building heights, location, orientation, and massing. At the subarea level of analysis, it is impossible to accurately forecast these factors for all development in the subarea. Therefore, the programmatic analysis contained in the EIS describes a range of potential vertical and horizontal impact areas, depending on the type of development that may occur.</p> <p>At the same time, it is agreed that it is essential to conduct a quantitative wind analysis of individual development proposals to ensure that wind impacts on the Lake Union Seaport Airport are mitigated. Therefore, an additional mitigation measure requiring a project-level analysis of wind impacts for all new development above the base height permitted under the Seattle Mixed zoning is recommended. The approach to this analysis would include the following steps:</p> <ol style="list-style-type: none"> <li>1. Construct a physical scale model of the proposed project and/or the maximum building envelope allowed at that site, with the surrounding physical context (i.e., existing buildings, topography, etc.)</li> <li>2. Install the model into a boundary layer wind tunnel and measure velocities and turbulence levels along the prescribed flight path with and without the proposed project</li> <li>3. Test for prevailing wind directions and/or wind directions that are expected to have an impact on the flight path</li> <li>4. Present resulting data in a form to allow for quantitative comparison between existing and proposed conditions</li> <li>5. Provide a written report summarizing the methodology, results and interpretation of the results against any available published aviation standards for shear layers and turbulence levels. Analysis results would require interpretation by an aviation specialist who would assess the acceptability of these specific results for the aircraft actually used at this location.</li> </ol> <p>In addition, the City may consider requiring additional analysis to address the</p>

Comment Number	Response
	<p>following questions:</p> <ul style="list-style-type: none"> <li>• Additional review to address potential future adjacent development (i.e., a future configuration which may augment or mitigate predicted impacts in the future)</li> <li>• Testing of mitigation schemes if the project results are unacceptable (i.e., the wind tunnel study could be then used to help define a height, size and location on that site that could be acceptable).</li> </ul> <p>As noted in the response to Comment 17 above, the potential wind wake impact on recreational sailing on was not included as part of the Final EIS scope.</p>
77	<p><b>Shadow Analysis.</b> A more detailed and specific account of the shadow impacts of each alternative can be found in the Aesthetic Shadows section (3.10.9 – 3.10.12) of the Draft EIS. Project specific mitigation strategies are identified in Draft EIS Section 3.10.11. Additional mitigation strategies to reduce shadow have been identified based on policy guidance contained in the Urban Design Framework and are included in Final EIS Section 3.4.</p>
78	<p><b>Alternatives Not Supported.</b> The comment is noted.</p>
79	<p><b>Draft EIS Alternatives.</b> The comments are noted. As described in Draft EIS Sections 2.2.5 and 2.3.7, the alternatives considered in the Draft EIS were developed and revised through an extensive outreach process. The alternatives established through this process were carried forward for review in the Draft EIS.</p>
80	<p><b>Affordable Retail Spaces Missing.</b> The comments are noted.</p>
81	<p><b>Public Safety Mitigation.</b> As described on Draft EIS page 3.14-12, potential criminal activity and calls for police service could be reduced through the implementation of building design features such as orienting buildings towards the sidewalk and public spaces, providing connections (i.e. walkways, etc.) and providing adequate lighting and visibility; the use of underground tunnels is not proposed. These potential design features would enhance the visibility of the public realm area and thereby discourage potential criminal activity in the area.</p>
82	<p><b>EIS Methodology.</b> Although the specific methodology that the comment refers to is unknown, the Draft EIS generally incorporated conservative assumptions and methodologies intended to ensure that potential adverse impacts were not minimized. As relevant, specific methodologies for the corresponding element of the environment are described in Chapter 3 of the Draft EIS.</p>

Comment Number	Response																		
83	<b>Scoping Comments.</b> The comment is noted. As described in the response to Comment 17, the City considered all public comments in finalizing the scope of the EIS.																		
84	<b>Emergency Response Statistics.</b> Table 3.14-3 of the Draft EIS illustrates the incident responses for fire stations that serve the South Lake Union Neighborhood and are representative of annual activity for the Seattle Fire Department in this area. As described on Draft EIS pages 3.14-9 and 3.14-10, the Seattle Fire Department calculated the projected number of EMS service calls that could occur in the South Lake Union Neighborhood under the Action Alternatives and the No Action Alternative. Seattle Fire determined that additional EMS incident responses may be required for the South Lake Union neighborhood with or without development under the action alternatives.																		
85	<b>Police Response Data.</b> Draft EIS Table 3.14-6 illustrates the number of calls for the West Precinct between 2005 and 2009. The West Precinct is divided into 12 sectors/beats and the South Lake Union Neighborhood generally comprises Sector D1 and D2. The D1 sector generally includes the western portion of the South Lake Union Neighborhood while D2 generally encompasses the eastern portion of the South Lake Union Neighborhood. Please refer to the table below for a breakdown of calls for service in the D1 and D2 sector areas for the period 2005-2009.																		
<b>2005-2009 Calls for Service – D1 and D2 Sector</b>																			
<table border="1"> <thead> <tr> <th></th> <th>D1 Sector</th> <th>D2 Sector</th> </tr> </thead> <tbody> <tr> <td>2005</td> <td>12,114</td> <td>7,959</td> </tr> <tr> <td>2006</td> <td>12,735</td> <td>7,440</td> </tr> <tr> <td>2007</td> <td>12,583</td> <td>6,995</td> </tr> <tr> <td>2008</td> <td>9,448</td> <td>7,753</td> </tr> <tr> <td>2009</td> <td>9,141</td> <td>8,189</td> </tr> </tbody> </table>			D1 Sector	D2 Sector	2005	12,114	7,959	2006	12,735	7,440	2007	12,583	6,995	2008	9,448	7,753	2009	9,141	8,189
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<b>Source: Seattle Police Department, 2010.</b>																			
<p>Draft EIS Page 3.14-12 acknowledges that the hiring of new officers under the <i>Neighborhood Policing Staffing Plan</i> has been delayed due to recent budget issues. However, the Seattle Police Department anticipates that the remaining new officers identified in the <i>Neighborhood Policing Staffing Plan</i> would be hired prior to the assumed buildout date under the action alternatives (2031).</p>																			
86	<b>Wind Impacts on Recreational Sailing.</b> Please see the response to Comment 17, above.																		
87	<b>Wildlife and Building Heights.</b> The blue heron, ducks, and freshwater turtles																		

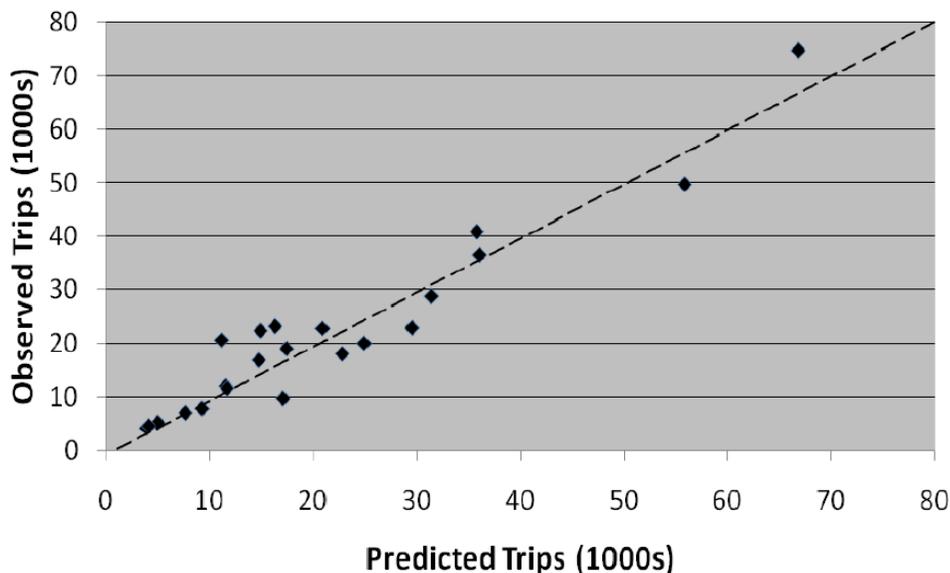
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	<p>that currently use South Lake Union are acclimatized to urban situations. Because the high-rise buildings would not be constructed all at once, these species would have sufficient time to adapt to changes in their environment. Therefore, increased building heights are not anticipated to significantly adversely affect either their populations or behavior.</p>
<p><b>88</b></p>	<p><b>Affordable Housing.</b> The comment is noted. Draft EIS Section 3.9.2, Housing, describes that incentive zoning provisions, including developer financial contributions to affordable housing, may be used to achieve increased residential building heights. Through use of these incentives, the action alternatives may have the potential to result in an increased number of affordable units than the No Action Alternative.</p> <p>The discussion in Section 3.9.2 states that there are a number of factors that impact the potential for affordable housing, including development costs, property values, market demand, individual property owner goals, and opportunities for financing affordable housing. Under any of the alternatives, these factors will affect the actual number of affordable units that are built in the neighborhood.</p>
<p><b>89</b></p>	<p><b>Habitat and Shading.</b> Based on the Draft EIS shading study, shading would only occur during mornings and evenings in the winter when many plants are dormant. None of the proposed alternatives would shade South Lake Union for the entire day, and most urbanized wildlife can move from shadier areas to sunnier areas as needed. In addition, the potential shading impacts to wildlife and potential mitigation measures (e.g., removing existing underwater debris that currently causes shade), would be assessed at a project-level basis as part of the SEPA review process associated with project-specific development. Revisions to the shading analysis contained in Final EIS Section 3.4 do not alter this conclusion.</p>
<p><b>90</b></p>	<p><b>Flight Path and Birds.</b> Waterfowl and other birds currently fly in the FAR 77 area without major incidents. Birds quickly habituate to changes in their surroundings and are adept at making changes in flight to avoid collisions. Avian flight paths are not anticipated to be significantly affected in the lake vicinity by the proposed density changes. In addition, potential impacts to wildlife and potential mitigation measures, would be assessed at a project level basis as part of the SEPA review process associated with project-specific development.</p>
<p><b>91</b></p>	<p><b>Transportation Mitigation.</b> The commenter correctly notes that many mitigation measures are aimed at improving the quality of the pedestrian, bicycle, and transit systems in the neighborhood.</p>

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92	<p><b>Trip Generation Methodology.</b> The summary of the trip generation methodology used in the Draft EIS is noted.</p>
93	<p><b>MXD Validation Methodology.</b> The MXD tool used in the Draft EIS has been reviewed by academics as part of submissions to peer-reviewed scholarly journals. As part of this academic review process, the methodology, validation, and applicability of this model to a variety of environments were deemed to be adequate as to warrant publication in academic journals. In addition to this academic review, the MXD tool has been officially adopted by the San Diego Council of Governments and the US EPA as their preferred methods of calculating trip generation for mixed use developments in urban and suburban settings. MXD has also been successfully applied in several Environmental Impact Reports in California. With respect to the critique of the validation methods, the commenter notes that the ITE's traditional validation methods of comparing a model/equation to a suburban site is inappropriate for a tool applied in South Lake Union. The transportation analysis used in South Lake Union agrees with this conclusion and therefore the MXD tool was validated using 16 sites, both urban and suburban to test the viability of the tool across a range of built environments. In terms of the validation metric - the primary validation metric was total external vehicle trips; however, observations of modal trips were also made.</p>
94	<p><b>Statistical Validation of MXD Model.</b> The MXD tool was validated at a level that is unprecedented for most travel forecasting tools. The current ITE recommended practice was estimated using three sites in Florida and no statistical validation of this widely used method was published in the original ITE document. Typical travel models used for travel forecasting are also not subject to statistical validation, but rather a more simplistic look at how the model can replicate traffic counts at a small set of screenlines. The more rigorous validation of the MXD tool at 16 independent sites and comparison of statistics such as root-mean squared-error and pseudo- R squared indicate that the MXD model is more accurate at trip generation estimates in urban areas when compared to other methods and is the best available technique for this EIS.</p> <p>In response to the commenter's question about model bias (e.g., consistently under-predicting the trip generation of a project/site), the following table showing the MXD model's performance at the validation sites:</p>

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Figure 5. Scatterplot of Predicted vs. Observed External Vehicle Counts



As shown in the table, the model does not have a bias and most trip generation estimates are within 20 percent of the observed trip generation.

**Letter 14: Goodspeed, Jim; Gemmel, Chris; and Groth, Lori**

- 1 Please see responses to Comments 54 through 72 and 91 through 94, Letter 13.

**Letter 15: Ramey, Brian**

- 1 Please see responses to Comments 73 through 83, Letter 13.

**Letter 16: Staton, Renee A.**

- 1 **Environmental Benefits.** As the commenter states, the EIS does not discuss the environmental benefits of the proposal. As noted in WAC 197-11-402, EISs are required to identify potential significant adverse impacts, but are not required to address beneficial environmental impacts.  
  
With respect to climate change, it should be noted that the GHG analysis does incorporate a per capita analysis. As shown in Table 3.7-6 of the Draft EIS, the analysis concludes that on a per capita basis the three action alternatives produce transportation GHG emissions that are about five percent lower than the No Action Alternative. Compared to a typical suburban employment center along Bel-Red Road in Bellevue and Redmond, the action alternatives would result in GHG emissions that are about 15 percent lower per capita.

Comment Number	Response
2	<p><b>Economic Development.</b> The City issued the Scoping Notice for this Draft EIS on November 18, 2008 and invited comments on the EIS scope through December 18, 2008. Through 2009, the City worked with neighborhood stakeholders and the public to address concerns raised by the scoping comments. Based on this process, the City revised the EIS alternatives and finalized the scope of the EIS. Economic development was not included as part of the EIS scope.</p> <p>Please see a discussion of the City's Comprehensive Plan Economic Development Element in Final EIS Section 3.2.</p>
3	<p><b>Urban Form.</b> The comments are noted. The impacts on urban form are considered in the aesthetics section of the Draft EIS, which include street-level images, views and shadows. Please see revisions to the aesthetics analysis in Final EIS Section 3.4. Although the analysis assumes that future development would maximize development potential, the potential to pull back development from property lines is acknowledged.</p>
4	<p><b>Neighborhood Facilities.</b> The comments are noted. As described in Final EIS Chapter 2, a fundamental objective of the proposal considered in the EIS is to use incentive zoning to achieve public benefits, including those listed in the comment. Please see Draft EIS Section 3.16 for a discussion of open space and recreation facilities and this Final EIS Section 3.5 for a discussion of schools.</p>
5	<p><b>Conclusion.</b> The comment is noted. Please see the responses to comments 2 through 4 in this letter, above.</p>
<b>Letter 17: Lee, Sharon</b>	
1	<p><b>Financial Analysis.</b> The Draft EIS housing analysis provides a programmatic review of housing affordability goals; growth in affordable housing in the neighborhood, and a qualitative discussion of the difference between the alternatives in the potential for affordable housing development. Reliable data is not available to develop a quantitative 20-year forecast of affordable housing development under each alternative. From a qualitative perspective, the discussion in Section 3.9.2 states that there are a number of factors that impact the potential for affordable housing, including development costs, property values, market demand, individual property owner goals, and opportunities for financing affordable housing. Under any of the alternatives, these factors will affect the actual number of affordable units that are built in the neighborhood.</p> <p>The referenced sentence was simply noting that all of the action alternatives would provide adequate capacity to achieve housing targets. It was not intended to provide a conclusion regarding the financial feasibility of various</p>

Comment Number	Response
	incentive measures.
2	<p><b>Potential for Low-Income Housing.</b> The programmatic review in the EIS does not include a quantitative assessment of the number of parcels available for low-income housing development. The discussion in Section 3.9.2 states that there may be market-driven opportunities for new construction of affordable housing associated with the minimum lot size requirements contained in the action alternatives. Depending on lot configurations, consolidation of parcels to create the minimum lot requirement may create remainder lots that are not large enough for another tower and potentially available for low-scale development, including affordable housing. This section also notes that there are a number of factors that impact the potential for affordable housing, including development costs, property values, market demand, individual property owner goals, and opportunities for financing affordable housing. Under any of the alternatives, these factors will affect the actual number of affordable units that are built in the neighborhood.</p>
3	<p><b>Transfer of Development Rights.</b> The comment is noted.</p>
4	<p><b>Alternative 1 Impacts.</b> The comment is noted. Please see the response to Comment 1 in this letter.</p>
5	<p><b>New Alternative.</b> As described in Draft EIS Sections 2.2.5 and 2.3.7, the City identified the alternatives considered in the Draft EIS based on an extensive outreach process with interested stakeholders. The alternatives identified through this process did not include an option that rezones the existing Industrial Commercial (IC) zone and does not adopt the incentive zoning measures. Such an alternative may not meet the objectives of the proposal identified in Final EIS Chapter 2. However, the EIS does not preclude a future policy decision by the City of Seattle to adopt this approach.</p>
6	<p><b>Affordable Housing Strategies.</b> The comments are noted.</p>
7	<p><b>Support Increased Low Income Housing Resources.</b> The comment is noted. Please see Final EIS Chapter 2 discussion of incentive measures, which includes TDR as an option.</p>
<p><b>Letter 18: Dinndorf, Jerry</b></p>	
1	<p><b>Urban Design Framework (UDF).</b> The comment is noted. EIS Chapter 2 provides a description of the UDF, including the incentive provides identified in the UDF. Please see Final EIS Section 3.4 for revisions to the aesthetics analysis which incorporates additional information from the UDF. Please see response to Comment 1, Letter 90 regarding the <u>South Lake</u></p>

Comment Number	Response
	<u>Union/Uptown Triangle Mobility Plan.</u>
2	<b>Mitigation.</b> The comment is noted. Mitigation strategies address identified impacts.
3	<b>Funding to Support Growth.</b> The comment is noted.
4	<p><b>Additional Analysis.</b> Subsequent to issuance of the Draft EIS, additional review of the flight path was conducted (see Appendix F). This analysis included a review of how seaplane lanes are utilized (including runway utilization, flight tracks, and piloting techniques), an evaluation of the aircraft fleet used by floatplane operators, and documentation of the performance characteristics of the various floatplane aircraft. Several Federal Aviation Administration (FAA) and International Civil Aviation Organization (ICAO) planning documents that have applicability in the establishment of approach/departure protection boundaries for curving approach and departure procedures such as those used on Lake Union were also reviewed. Based on this analysis, and in coordination with WSDOT Aviation, a revised flight path was identified (see Section 3.2 of this Final EIS). This revised flight path differs from that shown in the Draft EIS in that portions are narrower than the previous flight path, the curvature is more gradual, and the east-west legs of the flight path have shifted slightly to the north. Specifically, the southern boundary has shifted 400-500 feet north so that the southern boundary lies north of Valley Street and is generally aligned with Broad Street. The southern boundary now crosses Aurora Avenue North at about Mercer Street. Similarly, the northern boundary of the flight path shifted 200-300 feet north, crossing the Lake Union shoreline at roughly Highland Drive and crossing Aurora Avenue just north of Ward Street.</p> <p>Regarding the transportation analysis, please see the responses to comments 33 through 41 in this letter.</p>
5	<p><b>Economic Impacts.</b> The City issued the Scoping Notice for this Draft EIS on November 18, 2008 and invited comments on the EIS scope through December 18, 2008. Through 2009, the City worked with neighborhood stakeholders to address concerns raised by the scoping comments. Based on this process, the City revised the EIS alternatives and finalized the scope of the EIS. The potential benefits of economic development was not included as part of the EIS scope.</p> <p>Please see Final EIS Section 3.2 for a discussion of the City's Comprehensive Plan economic development policies.</p>
6	<b>Consider Comments.</b> The comment is noted. Please see the responses to comments in this letter.

Comment Number	Response
7	<p><b>Habitat and Shading.</b> Please see the response to Letter 13, Comment 14, above.</p>
8	<p><b>Greenhouse Gas Emissions.</b> The commenter raises a valid point that the transportation mitigation measures will also reduce GHG emissions. Similarly, the recommended adoption of green building designs could also act as a mitigation measure to reduce GHG emissions.</p>
9	<p><b>Availability for Development.</b> As described in the scope of the EIS, no land use impacts are anticipated to result from the proposal that are not already possible under current zoning. Therefore, the land use analysis focuses on a plans and policies analysis, together with potential wind impacts associated with the Lake Union Seaport Airport.</p> <p>Assumptions regarding potential for future development are described in Draft EIS Section 3.10.1 and have been clarified in Final EIS Section 3.4. These assumptions form the basis for the 3D modeling in the aesthetics analysis.</p>
10	<p><b>Sustainability Analysis.</b> For a greenhouse gas analysis, please refer to Draft EIS Section 3.7. This analysis concludes that on a per capita basis the three action alternatives produce transportation GHG emissions that are about five percent lower than the No Action Alternative. Compared to a typical suburban employment center along Bel-Red Road in Bellevue and Redmond, the action alternatives would result in GHG emissions that are about 15 percent lower per capita.</p> <p>Final EIS Chapter 2 includes LEED Neighborhood Development as a possible incentive measure that could be incorporated into an incentive program.</p>
11	<p><b>Building Height Limits.</b> The recommended Draft EIS mitigation to address wind impacts was not intended to suggest that building heights in the Cascade neighborhood would be increased. Please see the response to Comment 12 in this letter, below.</p>
12	<p><b>Flight Path.</b> The development assumptions described in the EIS incorporated the flight path limitations (see Draft EIS Section 3.10.1). Subsequent to issuance of the Draft EIS, additional review of the flight path was conducted (see Appendix F). This analysis included a review of how seaplane lanes are utilized (including runway utilization, flight tracks, and piloting techniques), an evaluation of the aircraft fleet used by floatplane operators, and documentation of the performance characteristics of the various floatplane aircraft. Several Federal Aviation Administration (FAA) and International Civil Aviation Organization (ICAO) planning documents that have applicability in the establishment of approach/departure protection boundaries for curving approach and departure procedures such as those used on Lake Union were</p>

**Comment  
Number****Response**

also reviewed.

Based on this analysis, and in coordination with WSDOT Aviation, a revised flight path was identified (see Section 3.2 of this Final EIS). This revised flight path differs from that shown in the Draft EIS in that portions are narrower than the previous flight path, the curvature is more gradual, and the east-west legs of the flight path have shifted slightly to the north. Specifically, the southern boundary has shifted 400-500 feet north so that the southern boundary lies north of Valley Street and is generally aligned with Broad Street. The southern boundary now crosses Aurora Avenue North at about Mercer Street. Similarly, the northern boundary of the flight path shifted 200-300 feet north, crossing the Lake Union shoreline at roughly Highland Drive and crossing Aurora Avenue just north of Ward Street.

This programmatic analysis in Section 3.8 of the Draft EIS included a qualitative analysis of potential wind impacts. From a quantitative perspective, numerous factors will affect wind patterns in an urban area. The most critical of these are building heights, orientation, location and massing. At the subarea level of analysis, it is impossible to accurately forecast these actors for all development in the subarea. Therefore, the programmatic analysis contained in the EIS describes a range of potential vertical and horizontal impact areas, depending on the type of development that may occur. At the same time, it is agreed that it is essential to conduct a quantitative wind analysis of individual development proposals to ensure that wind impacts on the Lake Union Seaport Airport are mitigated. Therefore, an additional mitigation measure requiring a project-level analysis of wind impacts for all new development above the base height permitted under the Seattle Mixed zoning is recommended. The approach to this analysis would include the following steps:

Please see Final EIS Section 3.4 (aesthetics analysis) for a revised analysis that includes the changes associated with the revised flight path.

This programmatic EIS included a qualitative analysis of potential wind impacts. From a quantitative perspective, numerous factors will affect wind patterns in an urban area. The most critical of these are building heights, location, orientation, and massing. At the subarea level of analysis, it is impossible to accurately forecast these factors for all development in the subarea. Therefore, the programmatic analysis contained in the EIS describes a range of potential vertical and horizontal impact areas, depending on the type of development that may occur.

At the same time, it is agreed that it is essential to conduct a quantitative wind analysis of individual development proposals to ensure that wind impacts on the Lake Union Seaport Airport are mitigated. Therefore, an additional

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Comment Number	Response
	<p>mitigation measure requiring a project-level analysis of wind impacts for all new development above the base height permitted under the Seattle Mixed zoning is recommended. The approach to this analysis would include the following steps:</p> <ol style="list-style-type: none"> <li>1. Construct a physical scale model of the proposed project and/or the maximum building envelope allowed at that site, with the surrounding physical context (i.e., existing buildings, topography, etc.)</li> <li>2. Install the model into a boundary layer wind tunnel and measure velocities and turbulence levels along the prescribed flight path with and without the proposed project</li> <li>3. Test for prevailing wind directions and/or wind directions that are expected to have an impact on the flight path</li> <li>4. Present resulting data in a form to allow for quantitative comparison between existing and proposed conditions</li> <li>5. Provide a written report summarizing the methodology, results and interpretation of the results against any available published aviation standards for shear layers and turbulence levels. Analysis results would require interpretation by an aviation specialist who would assess the acceptability of these specific results for the aircraft actually used at this location.</li> </ol> <p>In addition, the City may consider requiring additional analysis to address the following questions:</p> <ul style="list-style-type: none"> <li>• Additional review to address potential future adjacent development (i.e., a future configuration which may augment or mitigate predicted impacts in the future)</li> <li>• Testing of mitigation schemes if the project results are unacceptable (i.e., the wind tunnel study could be then used to help define a height, size and location on that site that could be acceptable).</li> </ul>
<p><b>13</b></p>	<p><b>Transfer of Development Rights.</b> Please see Final EIS Chapter 2, which includes TDR as a possible incentive measure that could be incorporated into an incentive zoning program.</p>
<p><b>14</b></p>	<p><b>Housing Forecasts.</b> The Draft EIS housing analysis provides a programmatic review of housing affordability goals; growth in affordable housing in the neighborhood, and a qualitative discussion of the difference between the alternatives in the potential for affordable housing development. Reliable data is not available to develop a quantitative 20-year forecast of affordable housing development under each alternative. From a qualitative perspective, the discussion in Section 3.9.2 states that there are a number of factors that impact the potential for affordable housing, including development costs,</p>

Comment Number	Response
	<p>property values, market demand, individual property owner goals, and opportunities for financing affordable housing. Under any of the alternatives, these factors will affect the actual number of affordable units that are built in the neighborhood.</p> <p>Incentive zoning is a fundamental element of the proposal and is identified in the mitigating strategies section of the Draft EIS housing analysis.</p>
15	<p><b>Comprehensive Housing Inventory.</b> The comment is noted. Although resources for such an inventory were not included in the scope of the EIS, information on the existing housing inventory was included and has been updated in Final EIS Section 3.3.</p>
16	<p><b>Housing Affordability.</b> Please see Draft EIS page 3.8-9 for a table summarizing the affordable housing goals for all urban centers or villages in the City. Please see the response to Comment 15 in this letter, above, regarding the comprehensive housing inventory. From a qualitative perspective, the potential for displacement of existing wood-frame structures is considered in the Draft EIS. As noted under Alternative 4, current residential trends are likely to continue.</p>
17	<p><b>Incentives for Housing Preservation.</b> The comments are noted. Please see the response to Comment 15, above, regarding the comprehensive housing inventory.</p>
18	<p><b>Height Bulk and Scale Study.</b> The options studied were limited to the alternatives provided as determined during the EIS scoping process. Based on comments received during the Draft EIS comment period, more specific mitigations have been added in the Final EIS, see Section 3.4. The issue of tower spacing is also being addressed in the Final EIS through a recommendation for a minimum distance between residential towers, in addition to the limitation on the number of towers per block.</p>
19	<p><b>Level of Analysis.</b> As is typical of an EIS for a neighborhood where development has not yet been designed, the possible height, bulk and scale of future buildings has been provided without additional detail – other than the likely number of floors and the possibility of rooftop mechanical spaces. Further development of building design was intentionally omitted for three reasons: first, to limit discussion to the elements being evaluated in the EIS; second, to avoid appearance of bias for or against development by showing buildings as more or less attractive, and; third to avoid visual distractions from the main points of analysis.</p>
20	<p><b>Urban Design Framework (UDF).</b> As noted in the comment, the UDF is referenced in several parts of the EIS. Recommendations from the UDF have</p>

Comment Number	Response
	<p>been added to the Final EIS Aesthetics analysis and mitigating strategies, see Final EIS Section 3.4.</p>
<p><b>21</b></p>	<p><b>Bulk and Scale.</b> The Draft and Final EIS imagery attempt to accurately show the possible building massing outcome of the zoning alternatives without speculation as to design modifications that may alleviate or moderate the impact of the potential height, bulk or scale of new development built to the maximums allowed. By showing the possible massing outcome without bias, the need for possible mitigation is highlighted. Specific recommendations for mitigation have been added to the Final EIS (Section 3.4) to address public comments related to the bulk and scale of future buildings visualized in the Draft EIS.</p>
<p><b>22</b></p>	<p><b>Open Spaces.</b> The comment is noted. A mitigation measure to encourage more open space has been added to Final EIS Section 3.4. In addition, a specific mitigation to limit the bulk of the larger podiums allowed under Alternate 1, is recommended in the Final EIS for the specific purposes of moderating their bulk and encouraging the creation of more public open space. Please see also the discussion of open space in Draft EIS Section 3.16, Open Space and Recreation.</p> <p><b>Bread Loaves vs. Towers.</b> The massing alternatives were color coded to highlight the difference between commercial office, biotech and residential structures, which was intended to make it easier to distinguish between the differences between building floor plate sizes (see Fig. 3.4-2). As noted above under 'Open Spaces', specific mitigations have been added to the Final EIS for limiting the bulk of the larger podiums allowed under Alternate 1.</p> <p><b>Tower Controls and Incentives.</b> Many of the recommendations for controls contained in the UDF have been added to the Final EIS as specific mitigations to the height alternatives. The identification of specific incentives will be determined by the City in future policy and regulatory decisions. The menu of possible incentives, including those listed in the UDF, are described in EIS Chapter 2.</p> <p><b>Podiums.</b> The comment is noted. Please see Final EIS Section 3.4 for specific mitigating strategies related to podium size.</p> <p><b>Tower Spacing.</b> The comment regarding the need for spacing between towers is noted. A determination was made that this is a particular concern for residential buildings, since these are anticipated to be the tallest buildings allowed under incentive zoning and the building type where occupant safety is typically of the greatest concern. Residences are also the building type most concerned with privacy issues. Consequently, a recommendation for a minimum tower separation of 60 feet, measured perpendicular to the face of</p>

Comment Number	Response
	<p>the building, has been added as a potential mitigation in the Final EIS for residential towers built under incentive zoning.</p> <p><b>Re-Orienting Blocks.</b> The north-south orientation of Seattle City blocks is well established in much of the neighborhood and there is no specific recommendation contained in the EIS to mandate a re-orientation to East-West. The Final EIS does recommend that through-block passageways be encouraged and there is no requirement for the current orientation to be maintained.</p>
23	<p><b>Focus Areas.</b> The focus areas are described in Draft EIS Chapter 2. The analysis for these areas is intended to provide, where available and appropriate, additional detail regarding existing conditions and potential environmental impacts. The analysis provides additional information, but does not confer any specific benefits to these areas.</p>
24	<p><b>Redevelopment Assumption.</b> The EIS scope required that the aesthetics analysis be conducted for a build-out scenario. In addition, the analysis shows a 2031 scenario that matches future growth projections.</p> <p><b>Minimum Lot Size Assumption.</b> The comment is noted. The minimum lot size is based on the alternatives description, as defined through the scoping process. The intention of this element of the alternatives is to limit the number of towers built on any block to a maximum of two, and to recognize the minimum lot size typically associated with major commercial construction.</p> <p><b>On-Site Parking Assumption.</b> While it did not directly affect the 3-D massing studies, this assumption was added to highlight the potential issue of allowing above-grade parking. Above grade parking may be necessitated by specific site conditions (especially sub-surface conditions) on some properties within the neighborhood – if the property owner is to realize the full potential of the density and height allowed under incentive zoning. A mitigating measure to discourage above-grade parking has been added to Section 3.4 of the Final EIS.</p>
25	<p><b>3.10-2 – 3.10-9 Views.</b> These birds-eye views were included at the beginning of the Aesthetic Section to provide an overall (neighborhood-wide) perspective of the massing differences between the four alternatives and to show the study area in its regional context. They were not used to evaluate view impacts.</p>
26	<p><b>Alternative 1 Discussion.</b> The comment is noted. Please see the revised discussion in Final EIS Section 3.4.</p>
27	<p><b>Places of Transition.</b> The comment is noted.</p>
28	<p><b>Significant Unavoidable Adverse Impacts.</b> Prior to the summary statement</p>

Comment Number	Response
	<p>at the end of each section (Height, Bulk and Scale, Viewsheds, Shadows, Light and Glare), a more nuanced discussion of the impacts created by each alternative is offered. This summary statement is based on the conclusion that, with the proposed mitigation, none of the alternatives would result in significant unavoidable adverse impacts.</p>
<p><b>29</b></p>	<p><b>Historic Resources Affected Environment.</b> The comments are noted. Recent preservation projects in the study area include the New Richmond Laundry Building/Alley 24 development, the rehab of the Terry Avenue Building for restaurant use, the adaptive use of the former Naval Reserve Armory for MOHAI, and the incorporation of the Van Vorst Building into one of the Amazon complexes.</p> <p>The commenter is correct that the building at 201 Boren Ave N (#30) has been demolished and should be removed from both the table of Properties Previously Identified as Potentially Eligible for Historic Designation (Table 3.11-2) and from the map showing Eligible and Designated Historic Sites (Figure 3.11-1). At this time (8/29/11), the building at 223 Pontius Ave N (#37) is still extant and, therefore, remains in the table and on the map.</p>
<p><b>30</b></p>	<p><b>Historic Resources Environmental Impacts.</b> The commenter correctly notes that there is already significant pressure on small-scale historic buildings with current zoning. However, maintaining the current zoning would not <i>change</i> the development pressure on potential historic resources. Without mitigation, greater development opportunity presents the greatest pressure on lower-scale historic resources; discussion of potential impacts precedes examination of mitigation strategies.</p>
<p><b>31</b></p>	<p><b>Historic Resources Mitigation Strategies.</b> The comments are noted. Mitigation strategies vary considerably depending on the specific project and resources and have successfully included public education programs and interpretive media postings; oral history programs, exhibits, and interpretive plaques; and HABS/HAER documentation; as well as additional inventories and nomination reports and the other incentives modeling that are suggested already for the study area. Since this is a programmatic EIS, the recommendations are general; more specific mitigation may occur in the future when specific building projects are proposed or undertaken.</p>
<p><b>32</b></p>	<p><b>Cultural Resources.</b> In the context of the EIS, the term cultural resources refers to archaeological resources. As established in the scope of the EIS, the cultural resource analysis provides an assessment of potential archaeological resources, impacts and mitigation strategies.</p>
<p><b>33</b></p>	<p><b>Republican Street.</b> The City's travel demand model includes the ramp from</p>

Comment Number	Response
	<p>northbound SR 99 onto Republican Street. Based on the output of the travel demand model, no traffic impacts are anticipated and no mitigation is necessary. Including Republican Street as a study corridor would not change the outcome of the DEIS. The commenter also requests that details from the South Lake Union/Uptown Triangle Mobility Plan be included in the mitigation strategy. In response, the city agrees with many of the ideas and concepts in the South Lake Union/Uptown Triangle Mobility Plan and may implement specific elements that are consistent with other plans (Pedestrian Master Plan, Bicycle Master Plan, Transit Master Plan). However, given the programmatic nature of this EIS, specific details cannot be defined at this point, but will be included as part of specific project reviews.</p>
<p><b>34</b></p>	<p><b>Mitigate No Action Alternative and Future Volumes.</b> The commenter requests analysis of the No Action Alternative with mitigation, however, since the No Action Alternative can proceed without any conditions placed on it by the City, there is no mechanism to require mitigation measures. Therefore, a No Action with Mitigation Measures alternative is not a reasonable scenario to analyze in an EIS. The projected traffic volumes are forecasts determined by the City of Seattle travel demand model and the MXD tool. Please see the response to Comment 90, Letter #13 for additional information regarding the MXD tool.</p>
<p><b>35</b></p>	<p><b>Mitigate No Action Alternative.</b> The commenter requests analysis of the No Action Alternative with mitigation, however, this is not required or expected in an EIS.</p>
<p><b>36</b></p>	<p><b>Cheshiahud Lake Loop and Lake to Bay Loop.</b> The commenter notes that these facilities function as recreational bike paths and not as effective transportation cycling options. While this may be true, it does not change the result of the Draft EIS.</p>
<p><b>37</b></p>	<p><b>Safety Analysis.</b> There is no data source for analysis of safety based on near misses. It is true that the current funding picture for King County Metro is constrained and that there is the potential for near-term cuts in transit service. However, the Draft EIS is a forward-looking document, and assumes the regionally accepted levels of future transit as directed by the Seattle Department of Transportation and defined by the Puget Sound Regional Council. It should be noted what while transit funding fluctuates on the short-run, transit funding and service over the last 20 years has expanded substantially in the Puget Sound Region.</p>
<p><b>38</b></p>	<p><b>Land Use Assumptions.</b> The projected number of households and jobs takes into consideration both the DPD-provided regional growth estimates and full buildout of the capacities allowed by the alternatives. Pages 3.13-52 and 3.13-</p>

Comment Number	Response
	53 provide more details. Also refer to response to Letter 5, Comment 36. The description of Alternative 3 refers to the slightly higher proportion of residential development compared to the overall development when compared against the other action alternatives.
39	<b>Parking Assumptions.</b> Text on Page 3.13-64 and notes within the chart summarize the sources. The assumptions were made using the City of Seattle Municipal Code 23.54.015, and reflect the DPD's assumptions in Appendix B of the Draft EIS, and those made in a similar study, the Downtown Height & Density EIS.
40	<b>Mitigation.</b> Through the state's Commute Trip Reduction (CTR) program, large employers (more than 100 employees) provide the type of outreach described in the comment letter. The city sees additional opportunity to extend this level of outreach for smaller employers through the Commute Seattle program and by potentially extending the city's Growth and Transportation Efficiency Center (GTEC) program to include the entire South Lake Union neighborhood. GTEC extends CTR-style resources and benefits to all employers (rideshare matching, guaranteed ride home program, transit pass discounts).
41	<b>Figures.</b> The commenter is correct that Figure 3.13-7 should be titled "On-Street Parking Supply and Occupancy" (not off-street). Pages 29 and 57 are correct as published in the EIS; study corridor 10 and 11 have endpoints at Yale Avenue N, not Valley Street. The commenter also raises concerns about Figures 4, 9, 13, 14, and 17; those figures were examined and no mistakes were found.
42	<b>Public Services.</b> The Draft EIS analyzed potential impacts to police and fire services in consultation with the City of Seattle Police Department and the City of Seattle Fire Department. As described in the Draft EIS, the Seattle Police Department anticipated that sufficient staffing would be available to serve the South Lake Union Neighborhood through the continued implementation of the <i>Neighborhood Policing Staffing Plan</i> . The Seattle Fire Department indicated that additional EMS incident responses could be required in the South Lake Union Neighborhood with or without potential development under the alternatives.
<b>Letter 19: Johnson, Rob</b>	
1	<b>Support Increased Zoning Capacity and Flexibility.</b> The comment is noted.
2	<b>Mitigation.</b> The commenter requests that details from the South Lake Union/Uptown Triangle Mobility Plan be included in the mitigation strategy. In response, the city agrees with many of the ideas and concepts in the South

Comment Number	Response
	<p>Lake Union/Uptown Triangle Mobility Plan and may implement specific elements that are consistent with other plans (Pedestrian Master Plan, Bicycle Master Plan, Transit Master Plan). However, given the programmatic nature of this EIS analysis, specific details, such as which elements of the South Lake Union/Uptown Triangle Mobility Plan will be implemented cannot yet be determined.</p>
<p><b>3</b></p>	<p><b>Per capita GHG emissions.</b> Per capita GHG emissions information is presented on page 3.7-13 of the EIS.</p>

## Comment Letters 20-54

Citizen Comment	
20.	Adams, Terry and Ruth
21.	Allen, Chrissy
22.	Allen, Dean
23.	Alpert, Spencer
24.	Anderson, Fred
25.	Archambault, Curt
26.	Archambault, Curt and Carla
27.	Armstrong, Sally
28.	Arrington, Alice
29.	Asher, Larry
30.	Auckland, David
31.	Autry, Mike
32.	Bacarella, Mary
33.	Bajuk, Christopher
34.	Banfill, Sally
35.	Behar, Howard
36.	Bekins, Pamela
37.	Bennett, Don
38.	Biggs, William
39.	Bjerke, Bruce
40.	Bjerke, Jill
41.	Boland, Bridget
42.	Brandt, Adam
43.	Brooks, Tim
44.	Brumbaugh, Mark
45.	Buck, Peter L.
46.	Buford, Thomas
47.	Burch, William and Gloria
48.	Butler, Henry and Olga
49.	Calder, Allegra
50.	Carlin, Gregory
51.	Cesternino, Robert C.
52.	Chadsey, Majorie
53.	Chandler, John
54.	Clancy, Karson

Holmes, Jim

From: Terry Adams  
Sent: Monday, April 11, 2011 9:50 AM  
To: DPD\_Planning\_Division  
Subject: Comments on SLU EIS

We have three objections to Alternative #1 of the SLU EIS: 1) traffic, 2) green space, and 3) views. Development of the South Lake Union area will inevitably occur, but Alternative #1 sets a target that will make the resulting neighborhood much less attractive to families and to the existing residents.

1

For 10 years we lived in Vancouver BC where the downtown area has a height and density similar to Alternative #1. Like SLU it is also adjacent to the downtown. The traffic in this area is gridlocked during each commute period, and is bad even on the weekends. Part of the reason for the gridlock is that unlike New York, London, Paris, Toronto and other high-density cities Vancouver and Seattle do not have a mass transit system to move people around the area and to outlying areas. Within the SLU EIS there was no attempt to coordinate with King County on transit issues other than wishful thinking that they will participate in increasing mass transit options. Even if they do, they cannot provide more than surface transportation on roads that are already heavily used and gridlocked during commuting times. None of the cities we mention above have substantial bike traffic as an alternative and this would not really be an alternative in Seattle in the winter for many people. As a result, there will be increased car traffic and substantial gridlock in SLU.

2

Vancouver BC is surrounded on two sides by water and on the third side by a gigantic park. This provides the sense of open green space for the residents. Lake Union will be a beautiful waterfront on one side of SLU. However, with 400 foot towers between Mercer and Valley Avenues along with the fact that SLU is in a trough between Capital Hill and 3<sup>rd</sup> Avenue it is going to feel like anything but the open air of the Pacific Northwest.

3

The birds-eye-views from SLU may give excellent views of our Space Needle, mountains and lake, but 85 foot pedestals and 400 foot towers on the perimeter of SLU is going to limit all views to very narrow corridors. The practical result for those living and walking in SLU is very little of the views that make Seattle a nice place to live.

4

Terry and Ruth Adams

**Holmes, Jim**

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**From:** Allen, Chrissy @ Seattle [Chrissy.Allen@cbre.com]  
**Sent:** Monday, April 11, 2011 3:16 PM  
**To:** DPD\_Planning\_Division  
**Subject:** ESI Comment

Good afternoon,

I have been working in South Lake Union neighborhood for the past six years and have had the pleasure of watching the neighborhood grow and change. I would like for more people to live, work and visit the area. More people would mean more activity and life on the street. This added foot traffic would also support our local businesses and also encourage new business to move here.

I would like to express my encouragement for the city to adopt Alternative 1, the most aggressive and progressive alternative because it benefits the most people and maximize our city resources. It's the right thing to do.

Thank you,

Chrissy Allen | Real Estate Manager  
CB Richard Ellis | Asset Services  
321 Terry Avenue North, Suite 120 | Seattle, WA 98109  
T 206.264.8006 | F 206.624.1389 | C 206.218.7113  
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Holmes, Jim

From: Dean Allen  
Sent: Wednesday, April 06, 2011 2:38 PM  
To: DPD\_Planning\_Division

April 6, 2011

James Holmes, Senior Urban Planner  
City of Seattle Department of Planning and Development  
700 Fifth Ave, Suite 1900  
PO Box 34019  
Seattle, WA 98123-4019

Dear Mr. Holmes:

As a business owner and lifelong resident of Seattle, I have borne witness to the region's explosive growth over the last three decades. I know how important new development is to the city's economy, and I also know that zoning decisions must reflect the community's values. As such, I am writing to express my support for Alternative #1 under consideration in the South Lake Union Height and Density Draft EIS.

The timing of any new zoning approved for the South Lake Union neighborhood seems likely to produce a burst of development activity as we continue to emerge from the Great Recession. By generating new residential and commercial development near the urban core, Alternative #1 would bring a host of benefits to the city. Family-wage construction jobs would bring income-earning opportunities to newcomers and long-time residents alike. Market- and incentive-driven affordable housing construction – which, according to the EIS, is likely to be greatest under this alternative – would bring living options to wide range of families. And there would be many opportunities for new businesses to develop within the fabric of a dense and growing community.

Although the increase in congestion under this alternative would be greatest, I think the benefits outweigh this negative. Perhaps further study of modifications to transit service could be coordinated with King County Metro – such study may reveal ways around adding to congestion.

Seattleites place a high value on the livability of their communities, and Alternative #1 will drive the creation of new jobs, affordable housing, and new businesses – three keys to creating livable human environments. This is an opportunity to embed these values in the shape and form of new urban spaces, and we should not pass it up.

Sincerely,



Dean Allen

Holmes, Jim

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**From:** Spencer  
**Sent:** Saturday, April 09, 2011 5:51 PM  
**To:** Holmes, Jim  
**Subject:** South Lake Union Draft EIS

Dear Mr. Holmes:

This is in support of Alternative 1

I am a Seattle resident who dined and shops and spends time with family and friends in the South Lake Union area. Here are some of the reasons I am in support: more people will mean more activity and life on the street; more amenities will be created, such as smaller, locally-owned independent retailers and businesses with character; more eyes on the street means more safety; providing more housing near downtown can only increase the character of the neighborhood and allow for people to work and live in close proximity, thus decreasing noisy and environmentally-harming transportation alternatives; a shorter commute will also decrease everyday costs and leave more time for family and community; a variety of housing will allow for downsizing without having to give up preferred lifestyle choices, as housing in South Lake Union will allow continued, and easier access to entertainment and other desirable activities; density in the urban core could be a catalyst for better schools in the downtown area; more housing in the neighborhood would allow for healthy lifestyles by encouraging more biking and walking, which will also help the environment; and the taller, sleeker buildings will allow more light and preserve air quality in the neighborhood.

It's easy to picture a vibrant South Lake Union neighborhood as a catalyst for similar development in nearby communities, such as Belltown, where character can be preserved and the neighborhood can be allowed to grow and improve. And if not South Lake Union, where and how will development occur? Are we to have more bulky six-pack townhomes?

In South Lake Union new residents can take advantage of existing infrastructure, thus saving costs. Seattle has already put considerable economic support into this area; why not reap the benefits? More housing also means more affordable housing will become available. And more ongoing revenue for the city through real estate tax, sales tax, utility tax, etc. is sorely needed at this particular time, and would be a welcome side-effect of the more dense development that would occur.

What a great opportunity to do the right thing for our planet by supporting the greatest possible growth in the very part of town where it makes the most sense. If the city adopts Alternative 1, it will best benefit the most people and maximize our city's resources.

One can picture the South Lake Union neighborhood five, ten or twenty years from now, with little coffee shops and bakeries on the corners, people out walking their dogs and generally benefiting from the lifestyle such density will encourage. I'll bet we'll all look back with a sense of pride that when given the opportunity our planners had the forethought to ensure the future of this vital area so close to the Seattle Center and downtown core.

Best regards,

Spencer Alpert

# LEAJAK

Concrete Construction Inc.

PO Box 250  
Mountlake Terrace, Washington 98043  
Phone (425) 771-7168  
Fax (425) 771-6914

April 11, 2011

James Holmes, Senior Urban Planner  
City of Seattle Department of Planning & Development  
700 – Fifth Avenue, Suite 1900  
Seattle, WA 98101

Re: South Lake Union Height & Density Draft EIS Comments

Dear Mr. Holmes:

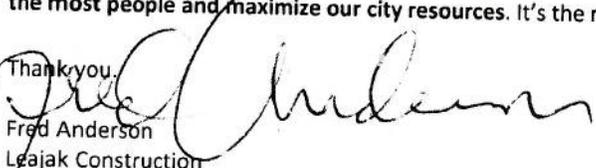
My name is Fred Anderson and the owner of Leajak Construction, a minority-owned business located in Seattle. It's very important that the South Lake Union DEIS identifies economic development benefits for each of the 4 alternatives. Since 2007, the current recession has hit everyone hard both in the private and public sector. Many families are struggling and the City needs to jumpstart the city's tax base, incentivize construction and encourage revenue streams that help pay for basic services (public safety, human services & parks). 1

My firm has played a big part in improving the transportation infrastructure and transit system in South Lake Union. Leajak Construction helped to make the streetcar project a reality and laid the concrete foundation for the rail tracks. This resulted in many livable-wage jobs not only for our firm but many other companies who have been involved in making South Lake Union a great livable urban neighborhood. The South Lake Union Streetcar lays the foundation for a great transit spine that provides a reliable and consistent transit facility that will serve the current and future job/residential growth targeted for this Urban Center. This key fixed-rail transit system runs through the heart of South Lake Union and the City needs to take advantage of this important public infrastructure improvement by siting taller buildings/densities along the entire streetcar alignment from Denny Way to Valley Street. 2

Our county's leaders now recognize that urban development must follow dense, compact and walkable attributes. President Obama stated in 2009 – "The days where we're just building sprawl forever, those days are over." I think that Republicans, Democrats, everybody recognizes that's not a smart way to design communities." The Obama administration introduced the "Sustainable Communities Initiative" that promotes more transit-oriented development in order to link more choices for affordable housing near employment opportunities. 3

The city should adopt Alternative 1, the most aggressive and progressive alternative because it **benefits the most people and maximize our city resources**. It's the right thing to do.

Thank you.

  
Fred Anderson  
Leajak Construction

**Holmes, Jim**

---

**From:** Curt Archambault |  
**Sent:** Wednesday, April 06, 2011 7:52 PM  
**To:** DPD\_Planning\_Division  
**Subject:** Support for Alternative #3

To whom it may concern,

After reviewing all of the alternatives, I am in favor of alternative #3 as it allows for growth in the neighborhood but does so in a much more manageable way. I carefully considered all options and feel that alternative 3 is a win-win for the community and the developers in the neighborhood. It is very clear that Vulcan and Urban Ventures would be in favor of alternative #1 but the motive is clearly monetary and not a concern for quality of life in the neighborhood. The higher the buildings, the obvious financial benefit there is for the developer. This doesn't take into consideration the infrastructure in the community and I have not seen anything from alternative #1 that would offset these deficiencies. Alternative #3 allows for growth, meaning money for the developers and a quality of life for current and future community residents. Part of living in the Northwest is the ability to take in the natural beauty of the community and the surroundings...alternative #3 still has enough room around the buildings for those currently in the community to continue to enjoy the surroundings. Alternative #1 and even #2 creates a skyline that blocks all that is good in the Northwest and that is the environment we live in and the accompanying views. It would be a travesty to allow for the iconic Space Needle to be blocked by monolithic structures like office buildings.

I realize there are many pressures on planning commissions and I just hope that you will give equal consideration to the residents in the community as is given to the developers. Be aware that I am not anti-developer as I think the street car in SLU, though unpopular in some circles, is a great addition to the community and will be value added for years to come.

Thank you for your consideration of my opinion.

Sincerely,

Curt Archambault  
Organization Effectiveness Manager  
Jack in the Box Restaurants  
(w) 858-609-3372  
(c ) 253-740-0134 (no voicemail)  
[curt.archambault@jackinthebox.com](mailto:curt.archambault@jackinthebox.com)



**in the box**

Holmes, Jim

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**From:** CURTIS ARCHAMBAULT  
**Sent:** Wednesday, April 06, 2011 7:57 PM  
**To:** DPD\_Planning\_Division  
**Subject:** Support for Alternative #3

To whom it may concern,

After reviewing all of the alternatives, I am in favor of alternative #3 as it allows for growth in the neighborhood but does so in a much more manageable way. I carefully considered all options and feel that alternative 3 is a win-win for the community and the developers in the neighborhood. It is very clear that Vulcan and Urban Ventures would be in favor of alternative #1 but the motive is clearly monetary and not a concern for quality of life in the neighborhood. The higher the buildings, the obvious financial benefit there is for the developer. This doesn't take into consideration the infrastructure in the community and I have not seen anything from alternative #1 that would offset these deficiencies. Alternative #3 allows for growth, meaning money for the developers and a quality of life for current and future community residents. Part of living in the Northwest is the ability to take in the natural beauty of the community and the surroundings...alternative #3 still has enough room around the buildings for those currently in the community to continue to enjoy the surroundings. Alternative #1 and even #2 creates a skyline that blocks all that is good in the Northwest and that is the environment we live in and the accompanying views. It would be a travesty to allow for the iconic Space Needle to be blocked by monolithic structures like office buildings.

I realize there are many pressures on planning commissions and I just hope that you will give equal consideration to the residents in the community as is given to the developers. Be aware that I am not anti-developer as I think the street car in SLU, though unpopular in some circles, is a great addition to the community and will be value added for years to come.

Thank you for your consideration of my opinion.

Sincerely,

Curt and Carla Archambault

Seattle, WA 98121

**Holmes, Jim**

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**From:** Sally Armstrong  
**Sent:** Tuesday, April 05, 2011 3:49 PM  
**To:** DPD\_Planning\_Division  
**Subject:** EIS Comment

Mr Holmes,

The reason for my message today is to convey my thoughts of the possible rezoning in the South Lake Union area.

I live on Capitol Hill, overlooking South Lake Union and have been in Seattle just a short five years, but during that time I have watched the continuous development of South Lake Union take place. What used to be a collection of vacant, run-down buildings and parking lots has made the transition to a viable and bustling community. However, the current height restrictions, I feel, does not allow South Lake Union to reach its full potential. It limits the height of new buildings, which results in bulky, space-consuming structures with little or no incorporated community space.

This inability to grow vertically causes the inevitable alternative of urban sprawl. Capitol Hill has already felt the effects of this outward growth - condos have consumed Broadway Avenue and the surrounding areas at an alarming rate. A walk down the once historical street is now feeling more and more confined with each new building. It's only a matter of time before the growth continues out to other neighborhoods.

Allowing South Lake Union to grow into a healthy addition of downtown absorbs this urban sprawl that is changing the culture of our existing neighborhoods. Also, the recent addition of Lake Union Park, which I feel is currently under-used, can only be enhanced with the removal of parking lots and the addition of supporting new residential and business opportunities. This also revitalizes our downtown area and pumps new life into the city's gateway to Lake Union.

I personally, would like to encourage the city to adopt Alternative 1 of the proposed rezone of South Lake Union.

Thank you for taking the time to review and consider my comments on this topic.

Regards,  
Sally Armstrong

Holmes, Jim

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**From:** Alice Arrington  
**Sent:** Tuesday, April 05, 2011 2:44 PM  
**To:** DPD\_Planning\_Division  
**Subject:** opposition statement

As a resident in the South Lake Union I want to express my concerns regarding the proposals set forth in the latest eis for SLU. (1) If the vision is for high density mixed-use buildings, the plan must include community amenities such as schools, centers for residents -including children - to play and gather, and better street transportation than the current plans are showing. Mostly (if not only) adults live in the core downtown area with its high rise office and condo buildings. There is no sense of a neighborhood community -and in fact there is a fair amount of crime and disturbances - in Belltown, 1st/2nd Ave, and the Denny Triangle areas. (2) It would be a travesty to line (even partially)the shore of Lake Union with high rises - as was attempted years ago with Lake Washington at the foot of Madison. As the first two buildings went up the folly of such a plan was immediately visible to the whole community. A step down plan would be more esthetically attractive for all city residents and would allow for growth in the area. It seems a bit un-Seattle-like to have the big developers, institutions and governemnt run rough shod over it citizens who want to be proud of a livable city where familys can grow and thrive, work and play, and enjoy the best that Seattle and the Northwest have to offer.

Alice Arrington

Holmes, Jim

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**From:** Larry Asher [larrya@svcseattle.com]  
**Sent:** Thursday, March 24, 2011 10:45 PM  
**To:** DPD\_Planning\_Division  
**Subject:** I'm supporting greater density in South Lake Union

Good Morning,

I am the co-owner of the School of Visual Concepts, a professional design and marketing communications school at 500 Aurora Avenue in South Lake Union. SVC has been in business for 40 years at this address, and I've been an owner of the school since 1994.

As someone who spends the better part of every day in the neighborhood I've seen vivid evidence of how more density has already been a huge plus for the city, for the area, for small businesses such as mine, and for the quality of life of those who work and live in South Lake Union.

I believe it's an important vision for the city to foster more successful "mom and pop" enterprises, and the increase in business activity and residents in SLU over the past few years has done exactly that. As few as five years ago, there were almost no restaurants or service businesses we could walk to from our location. Now, we have a choice of restaurants (many independently owned), coffee shops, banks, and other services, such as a hardware store, just a few blocks away.

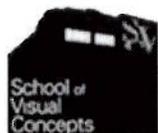
It's certainly made life more convenient for us and our employees. And, I'd submit that our small, privately held business has also been the beneficiary of greater density, as we are now seeing more and more students enrolling from Amazon, Group Health, REI, WPP, and Microsoft.

So to the extent that more density -- including density made possible by taller buildings -- would create a pool of customers for small businesses such as ours, I can only be in support of such a move. And I would encourage the drafters of an environmental impact statement to focus on this positive outcome of changes to the zoning in our neighborhood.

Thanks so much.

Larry Asher  
Co-Director

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School of Visual Concepts  
500 Aurora Ave. N.  
Seattle, WA 98109  
206-930-3417 direct  
206-623-1560 main  
[www.svcseattle.com](http://www.svcseattle.com)  
twitter svcseattle  
facebook.com/svcseattle

**Holmes, Jim**

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**From:** David Auckland  
**Sent:** Thursday, April 07, 2011 12:07 PM  
**To:** DPD\_Planning\_Division  
**Subject:** Support of South Lake Union development

Dear Mr. James Holmes, Seattle Dept of Planning and Development -

I am writing in support of further development and higher residential densities in South Lake Union.

As a avid fan of downtown seattle and a small business owner in Queen Anne, I've seen the dramatic improvement in energy and excitement that surrounds continued growth and opportunities in neighborhoods. Just recently, I stayed in downtown Bellevue and walked to a fine dining establishment and attended a movie. It was exciting to see lines at all the various entertainment establishments and energy that surrounded a vibrant concentrated area. I could only hope that South Lake Union is able to exceed that feeling and culture with increased foot traffic from higher density buildings.

It is absolutely critical to have permanent residents in neighborhoods to drive businesses to the area. We've all taken note of Ballard and Fremont, which are two of the most unique and special places in the downtown area and the thought of adding another in South Lake Union is thrilling. South Lake Union is perfect to replicate and exceed those models with existing infrastructure, parks, easy access to downtown core and the lake as well as momentum in business and employment opportunities. With all those things going for it, I couldn't think of a better place for the City to really embrace the environmental benefits of having people work, dine, shop and socialize where they live.

I believe the city should adopt Alternative 1 and really get behind maximizing our city resources and send a message that we're serious about being a world class city.

I look forward to the continued progress and excited about what the future holds for South Lake Union.

Sincerely,

David Auckland

Holmes, Jim

From: Mike Autrey  
Sent: Friday, March 25, 2011 3:41 PM  
To: DPD\_Planning\_Division  
Subject: SLU Draft EIS comments

I live in Fremont and work downtown, so I often travel through South Lake Union (on the bus). I also do business in South Lake Union from time to time. I think it's wonderful that this area is finally starting to be redeveloped. The type of dynamic, urban-infill, mixed-use and sustainable development that is going on in South Lake Union right now is exactly the reason why I moved to Seattle in the first place.

I would like to see no height restrictions in the neighborhood so that it can be a dense, urban neighborhood (commercial and residential) and include "pencil-tower" type development rather than solely consist of squatty, bulky and boxy development. As I understand it, in order to get the increased height over the current zoning, developers would be required to provide additional public amenities.

I believe that a denser South Lake Union with more height and with additional developer-provided public amenities will have the following benefits:

- \*better jobs/housing balance in Seattle as people can live in South Lake Union and bike, walk or take transit to work downtown (or in South Lake Union itself)
- \*keeps more employment downtown, one of the hallmarks of a sustainable city
- \*gives more people the opportunity to live without a car, so is more affordable
- \*puts people and development where we already have a lot of infrastructure instead of building new
- \*stimulates job creation as South Lake Union is becoming a biotech hub
- \*better preserve views of Seattle and Lake Union for people on the street and those that live and work in the existing, relatively short buildings in the neighborhood (i.e., your view is going to be better from the street or existing buildings if you're not walled in all around by seven-story buildings)
- \*more open space between buildings and bigger set backs from the street
- \*in comparison to development on the urban fringe (which is where the development will go if we don't accomodate it in areas like South Lake Union), compact, dense, in-fill development uses less energy, and reduces the number of vehicle miles traveled, helping to combat climat change

I really hope the city does the right thing here and gives Seattle the opportunity to be the poster child for smart growth. Sustainable development starts with density - if we don't get the high density part right, then we put a ceiling on the benefits of sustainable development, and I don't think we want to do that!

Thanks,

Mike Autrey



Comments from the Space Needle

March 28, 2011

**South Lake Union Draft EIS**

Good evening, my name is Mary Bacarella and I am the vice president of brand management for the Space Needle.

Thank you for the opportunity to comment on the Draft EIS, this urban form study is of vital interest to us as some alternatives could severely impact the Space Needle.

The Space Needle attracts 1.3 million visitors a year and generates \$280 million dollars per year in economic benefit to the region.

The Needle is the city's most recognized symbol of Seattle.

The Space Needle's landmark status is due in part to its unique hourglass shape, its tri-pod legs, and the fact that it is only one of two steel Towers in the world, the other being the Eiffel Tower in Paris.

We are very concerned because the visual depictions in the Draft EIS show that views to the Space Needle will be impacted by Alternative 1 and 2. Yet, the language of the Draft EIS concludes that there is no significant adverse impact to views of the Needle.

The thinking behind the Draft EIS conclusion seems to be that it is ok to cut off our legs. I urge you to re-read the landmark nomination of our iconic structure, and you will see it is the totality of our beloved Space Needle and its tripod legs that make it an icon. Lopping off a significant portion of this view is an adverse impact that must be recognized in the Final EIS. Mitigation measures and perhaps new alternatives must be developed to avoid this impact.

We believe that growth in our South Lake Union neighborhood should occur in a way that preserves the prominence of our city's premier landmark.

Views of the Space Needle should be enjoyed from neighborhoods, local parks and Lake Union.

As the symbol of the city we want to be a part of this process and stay in touch with our neighbors and the broader Seattle community. We are confident that the City will do a better analysis of any possible impacts to the Space Needle as we move forward with the Final EIS process.

Thank you.

203  
6th  
Ave. N  
Seattle,  
WA  
98109-  
5005

Phone:  
206  
905  
2200

Fax:  
206  
905  
2107

Holmes, Jim

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**From:** Christopher J Bajuk [cbajuk@uw.edu]  
**Sent:** Tuesday, March 29, 2011 10:45 PM  
**To:** Holmes, Jim  
**Subject:** South Lake Union EIS Feedback

Hello Jim,

I'm a graduate student at UW in the MBA and M.S. in Real Estate programs. I attended the hearing Monday night and have skimmed through the EIS. Like some of the folks said during the public comment period, I think it would be useful for the EIS to list potential POSITIVE impacts associated with greater density development, along with the negative impacts. I think it would be especially insightful if there were a study looking at the tax increment associated with each level of higher density so city taxpayers would have a better grasp of the issue knowing how higher density could equate to more revenue for the city. In fact, I'm looking for a good summer project (internship) and would definitely be interested in helping conduct this kind of analysis for the planning department. | 1 | 2

Other than that, I think the EIS looks good and is very thorough. On a personal note, I definitely support greater density development in the neighborhood. Much greater. Thank you. | 3

Sincerely,

Chris

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Chris Bajuk  
MBA Candidate 2011 | Michael G. Foster School of Business  
MSRE Candidate 2012 | Runstad Center for Real Estate Studies  
University of Washington  
Real Estate Club Co-President  
425-457-2710  
[cbajuk@uw.edu](mailto:cbajuk@uw.edu)  
[chrisbajuk@gmail.com](mailto:chrisbajuk@gmail.com)

Holmes, Jim

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**From:** Sally Banfill  
**Sent:** Friday, March 25, 2011 4:41 PM  
**To:** Holmes, Jim  
**Subject:** South Lake Union Project

Hello Jim,

I can't attend the meeting but wanted to send in this comment. Please add me to your email list if you have one.

I own a condo on Capitol Hill and recently saw an illustration of the new project. Allowing this much height and density is unacceptable. The Space Needle is an icon and focal point for the people of Seattle. This is a giant view blocking project that devalues thousands of homes! Paul Allen has enough money and should respect Seattle homeowners. He can build things without being this heavy handed and ruining Seattle for the rest of us.

Sincerely,

Sally Banfill

Holmes, Jim

From: Howard Behar [mailto:howard@...]  
Sent: Monday, April 11, 2011 2:58 PM  
To: Holmes, Jim  
Cc: Lynn Behar  
Subject: South Lake Union

Jim,

My name is Howard Behar. I am a lifetime resident of the Seattle area having been born and raised in the north end of the city. My father and mother were both immigrants to the city almost one hundred years ago. My father worked at the Pike Place Market long before it was a tourist attraction and my mother worked at Rhodes Department store (long since gone). As a family we have always been committed to the social and economic well being of our city. We have watched with pride the development of our city and celebrated it's continued caring for the people who live here and for the environment in which we live. So it is with that caring and love that I want to give you my input on South Lake Union development.

One of the great things about our city is its natural beauty. There are not many cities in the world that have such beauty. Our lakes, Puget Sound and our mountains along with hills and plant life all go to make our city one of the most scenic places to live. We have done a great job of keep our high rise growth in the downtown corridor....exactly where it belongs. Now I hear that we are considering extending high rise growth to the South Lake Union corridor. I could not disagree more with that idea. We have plenty of room already dedicated for high rise growth in the Bell Town area as well as downtown. Most of it is not be used so why spread out. I am not against tall buildings, just not for them everywhere. We have already done an extremely poor job of creating view corridors and parks in the downtown area, can you imagine what will happen if we open up the corridor to the lake for high rise development. If we wanted a city like New York we would move there. Can you imagine a city where people celebrate the fact that sunlight hits there windows for an hour a day and worst of all they think that is a big selling point, they do in NYC. We have enough gray let's not make it worse.

For the most part this all about economics. The developers are trying to maximize their earnings on the land they own.....I can understand their desires.....and the city government is trying to maximize it's tax base and I can understand that as well. The problem is that "economic maximization" is not the right goal. The right goal is preservation of our natural assets. The decisions that you make will be forever....never to be changed please do not make them based on someones pocket book....even our own.

Let's keep our natural beauty for all to see and enjoy. There is only one place for Lake Union to be....right where it is....on the other hand buildings are created by us....we can put them where we want them and keep them out of where we don't.

I vote for keeping the zoning the same and letting all not just a few take pleasure in the natural beauty of our surroundings. I bet if it came to a vote the rest of the citizens would vote the same way.

Warm regards,  
Howard Behar  
206-835-7770

Holmes, Jim

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From: pbekins@comcast.net  
Sent: Tuesday, March 29, 2011 12:58 PM  
To: DPD\_Planning\_Division  
Subject: Comment on the South Lake Union Height & Density Draft Environmental Impact Statement

I have been a resident of 2200 Westlake for 4 years. When my family first moved to our condominium at 2200 from Magnolia there was very little going on in the South Lake Union neighborhood. It was a bit like living on an island. We knew however that the neighborhood held great promise for the time when people would start joining us to live and work here.

The streetcar is now rolling through the neighborhood connecting us to almost every place that we want to go. When flying out of town, it could not be much easier than connecting from the streetcar to the light rail nearby that takes us to the airport. With all our new mobility choices we have now become a 1 car family.

The wonderful new Lake Union Park has recently opened a short distance away. This park is fairly passive in its design however, and would greatly benefit from more people using it 7 days a week.

With all the new Amazon employees coming to work in the neighborhood and new residents now living here, there are great restaurants and shops sprouting up all over the place. It is wonderful to see that many of the older neighborhood retailers and the shop owners who were pioneers in the new "South Lake Union" are now beginning to thrive. The streets are becoming much more alive during the day, but they have a lot of room for becoming more active and safe at night. I believe that the only solution for more safe night-time activity is a much greater concentration of people living in the neighborhood.

I urge the city to adopt Alternative 1 which will maximize the opportunity for much greater numbers of people living in South Lake Union. As a resident of a condo "tower" I welcome more towers like it. I have grown accustomed to looking out on high-rise office buildings and other residential towers. This is what I expect when living in the city. I greatly prefer looking at well designed buildings with lots of people living and working in them to the vast expanses of empty parking lots that I see as I overlook the Denny Triangle area. While I strongly support height and density in the neighborhood, I would like to see a move away from the bulkier buildings that current zoning supports and toward the taller slender buildings that I have seen in Vancouver, BC.

Pamela Bekins

**Holmes, Jim**

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**From:**  
**Sent:** Monday, April 11, 2011 4:21 PM  
**To:** DPD\_Planning\_Division  
**Subject:** DEIS

The Section on Public Services provides no information about South Lake Union. There is no breakout of calls or response times to SLU. Until there is a breakout of specific calls and response times to South Lake Union this is an invalid section.

There is no indication whether this lack is because of an absolute lack of information, lack of time or money to achieve this breakout, or an intentional effort to hide the data.

Until this is corrected in a Revised EIS or Final EIS This section and its conclusions have no validity.

Don Bennett

1



GroupHealth

Group Health Cooperative  
Administrative South Building  
12501 East Marginal Way South  
Tukwila, WA 98168

April 8, 2011

Seattle Department of Planning and Development  
Attn: James Holmes  
700 Fifth Ave., Suite 1900  
P.O. Box 34019  
Seattle, WA 98124-4019

Subject: South Lake Union Draft Environmental Impact Statement

Dear Mr. Holmes:

Group Health Cooperative has been an active part of the South Lake Union community since before our relocation of our headquarters to the neighborhood approximately three years ago. We have approximately 700 employees working in this neighborhood, and have enjoyed the increasingly vibrant community emerging in this part of our city. I am writing today in support of the proposed neighborhood rezoning of South Lake Union which in our view facilitates more room for businesses to grow, their employees to live and will add vibrancy to this neighborhood. Many benefits for employers, employees, residents and visitors exist in the proposal, including:

- Urban infill is sound public policy. When done well, development of enhanced density accommodates jobs and housing together, while decreasing congestion and dependency on single occupant vehicles. Expanding jobs in the urban center increases utilization of public transportation infrastructure..., helps relieve regional congestion, creates more vibrant local communities, and is supports healthy environments for working, living and playing.
- More people living/working in the area will create more activity on the street, people who will shop in local businesses, enhance vibrancy, and enhance safety.
- Expanding tax revenues associated with density will generate funding that is much needed for public services.
- SLU is currently underdeveloped and represents one of Seattle's best opportunities for accommodating growth while minimizing demand on city and regional roadways and other services.

How this growth is planned for and impacts mitigated are critical to the continued vitality of the community. Group Health would like to register the following comments on the Draft Environmental Impact Statement.

- We urge Department of Planning and Development to consider Economic Development as an important factor that is not adequately addressed in the Draft Environmental Impact Statement (DEIS). 1
- We encourage careful assessment of on-street and off-street parking to assure adequate supply of affordable and accessible parking for those who work, live, shop and/or visit SLU, while simultaneously improving transit service, enhancing walking and bicycling infrastructure. 2
- Related to above we encourage careful consideration of specific transportation impacts related to major road improvement projects in queue today and/or are planned or need to be, including the expansion of Mercer to 6-lanes, the North Portal and reconnection of the street grid north of Denny. These are critical to understanding and appropriately analyzing and mitigating impacts for each of the re-zone alternatives. 3

Thank you for your consideration.

Sincerely,

William Biggs, Executive Director Administrative Services  
Group Health Cooperative

**Holmes, Jim**

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**From:** Bjerke, Bruce [BruceBjerke@dwt.com]  
**Sent:** Friday, March 25, 2011 12:16 PM  
**To:** DPD\_Planning\_Division  
**Subject:** south lake union upzone proposal

I am writing to you in support of alternative #1 of the proposal upzoning alternatives for South Lake Union. 1

I have been a Seattle resident for more than 30 years, and am delighted by the transformation that is occurring in South Lake Union.

I live on Capitol Hill and now visit South Lake Union for shopping and to visit restaurants in the area. I also go to meetings with clients in their new offices in that neighborhood. It is clear that the area is quickly becoming a magnet for people who want to live near where they work, and shop close to home.

This kind of development reduces our society's dependence on the automobile and presents the rare opportunity to create a vibrant, urban living space that will enhance the attractiveness of our city as a place to live and work, and play.

This is a rare opportunity and I hope that the City will grant the approvals that are required to allow this to continue to happen, and will encourage continued development in the area in accordance with the terms of alternative #1.

Yours,

Bruce Bjerke  
1051 E. Galer St  
Seattle, Wa 98102

**Holmes, Jim**

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**From:** \_\_\_\_\_  
**Sent:** Tuesday, April 05, 2011 3:59 PM  
**To:** DPD\_Planning\_Division  
**Subject:** South Lake Union rezone proposal

My name is Jill Bjerke and I would like you to know that I support the proposal to rezone the South Lake Union area to allow more people to work and live there.

I was a Seattle Public Schools teacher for 30 years and recently retired. I live near Volunteer Park and often walk to the South Lake Union neighborhood, now that it is beginning to fill up with attractive shops, restaurants and pedestrian friendly attractions.

I think it is great to see the development of a true urban village, close to the center of the city, that will augment, rather than compete with the retail core of the city, and encourage people to walk from their homes to work and recreation.

Alternative #1 is the proposal that makes the most sense to me, and I support it.

Jill Bjerke

Holmes, Jim

From: Bridget Boland  
Sent: Monday, April 11, 2011 1:23 PM  
To: DPD\_Planning\_Division  
Subject: South Lake Union Draft EIS Comment

Hello, I'm a South Lake Union homeowner, above Westlake on Dexter Ave North. I've lived in the area for about three years. I rented an apartment in the South Lake Union area for two years before buying my condo one year ago. When I was looking at homes, location was the number one factor in my decision. I looked in Queen Anne, Ballard, Belltown, Capitol Hill, Fremont and Wallingford.

The decision to buy a home in South Lake Union was partly based on the amenities already available in the neighborhood but more on the development I hoped would be taking place over the next few years. I was hopeful that the neighborhood would come alive with new restaurants and shops, the Lake Union park, and bring more people and more foot traffic—and it has, even just over the last year. But we can do more to support the significant growth potential that exists in South Lake Union. I think adding some diversity in the shape and sizes of buildings would make the neighborhood much more interesting and attractive. Our condo look towards downtown, so right now, we see mainly parking lots and old, gray 1-2 story warehouses.

What I care about most as a resident is having more shops and restaurants and services like drugstores and drycleaners within walking distance. I also want to see more people on streets and in our new park instead of dark and quiet lots that attract crime. I see taller buildings as a means to further activating the neighborhood. I realize that the EIS does not study benefits that taller buildings can bring but I believe there are significant economic or environmental benefits we can gain by allowing greater height/density in this area. Where else could Seattle grow if not in South Lake Union?

I've also heard a lot of concern about towers near the lake. In my opinion, again, it's not so much about just the height of the buildings. As long as the towers are well designed, create welcoming access to the park, and provide a good street-level environment, I don't see a problem with tall 400-foot residential towers there. I've seen it done well in a lot of places like Portland and Vancouver, among many other cities. With all the innovative and creative organizations like Amazon, PATH and the biotech companies in the neighborhood, I think we need to take a page from them and think out of the box and be more progressive when it comes to zoning! We're in the middle of the city, not in the suburbs.

Thank you,  
Bridget Boland

Holmes, Jim

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**From:** Adam Brandt  
**Sent:** Thursday, March 10, 2011 8:05 PM  
**To:** DPD\_Planning\_Division  
**Subject:** South Lake Union Expansion

Hi,

I've recently heard the expansion around South Lake Union is being blocked by a small number of residents living in that area. I've lived close to SLU for almost 10 years now, and I'm currently living in Fremont. In my mind, SLU has been a dead zone for as long as I can remember. There have been some very nice stores in the area that I used to frequent, but they rarely last and most are long gone. Outdoor and More was one of my favorites, but finally closed last year, as I'm sure your aware. There's almost zero foot traffic in the area and my wife and I still laugh at the SLUT as it passes by mostly empty all day long. It would be really great to see more opportunities to live closer to downtown; the city should be taking every opportunity to increase downtown population density and prevent the miles of sprawl created in areas like Northern Aurora. Make no mistake, Seattle will continue to expand and SLU will be surrounded by larger buildings no matter what. Retarding this natural growth in a place a close as SLU will only provide the less favorable elements of the city a place to gather where they'll be off the radar from higher trafficed areas.

I hope this email helps you make the right decision. Respectfully, Adam Brandt



# KENMORE AIR™

the seaplane airline

6321 NE 175th Street, Kenmore, WA 98028 • Phone 425.485.4774 • Fax 425.485.4774

April 7, 2011

Mr. Jim Holmes, Senior Urban Planner  
City of Seattle Department of Planning and Development  
PO Box 34019  
Seattle WA 98124-4019

Response to South Lake Union DEIS

Dear Mr. Holmes,

Kenmore Air's comments to the *South Lake Union Height and Density Draft Environmental Impact Statement* relate to the following subjects:

### 1. Flight Operations/ Flight Path

The DEIS correctly identifies Kenmore Air as the largest operator on Lake Union. While Kenmore is responsible for transporting more than 80,000 passengers into and out of Lake Union annually, the most important and often overlooked perspective is that of the lake being recognized as an Essential Public Use Facility. Lake Union is the community's airport. It is one of the oldest and most active airports in the state. It has served as the location for the world's first international scheduled airline service, Boeing's first aircraft flights and home for more than five commercial seaplane operators during the 1980s. Today, the Lake Union airport is cited in numerous public documents as an airport of statewide and national significance. It is the present location for the only international customs and immigration facility for seaplanes in the greater Seattle area. As such it serves a number of daily scheduled international flights and foreign air carrier charter operators.

1

Perhaps the most critical element or mitigation necessary to ensure the safety of passengers in the air and residents on the ground is recognition of the lateral and vertical flight departure and arrival areas necessary for safe flight operations. For those aircraft departing to the south the area needed is generally shown in depictions in the DEIS and is referenced as FAR Part 77. While this FAA flight safety assessment tool is not legally binding (the FAA does not regulate land use changes or code revisions around airports) it is nevertheless one of the most recognized and useful tools for assessing the airspace requirements at airports. Jurisdictions consistently adopt this or a similar standard when evaluating the impacts of building or obstacle heights near airports in order to avoid

2

potential future liability and more importantly, as a measure to meet the general intent of preserving the public's best interest and safety.

2 cont

## 2. Wind Analysis

The DEIS conducts an analysis of the impacts of each Alternative with regard to the potential for increased height of vertical wind wake zones and shear layers, increased turbulence and changes in local wind patterns. The conclusions formed in the DEIS are general in nature. Among the most relevant generalizations are the following:

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“Sudden changes in wind speed or high levels of turbulence can have significant effects on the small aircraft aerodynamic response and thus can affect their safety margin” (p. 3.8-39)

“It is, therefore, important that aircraft, particularly small aircraft, fly beyond these zones.” (p.3.8-39)

“Apart from the risk of physical impact, small aircraft flying through a “canyon or “corridor” of tall structures can be significantly affected by turbulent, local winds channeling and accelerating between buildings.” (p.3.8-41)

“Where the building height plus the vertical wake exceed the flight path elevation, safety for planes taking off or landing is compromised.”

All of the above are accurate statements but generalizations to a fault. Nowhere do we see an analysis of these factors on the specific fleet mix used on Lake Union. An analysis of these factors should be relevant to the specific flight and performance characteristics of those aircraft in common use on Lake Union.

In the first statement we would ask what these significant effects do to climb performance and the resulting altitudes gained by departing aircraft at the southwest shoreline. In the second statement it is likewise important to understand for each proposed alternative what is the capability of the aircraft to fly beyond each zone. And for the third statement we need to again understand if the aircraft can perform within accepted safety standards.

Empirical evidence from more than 65 years of flying experience on Lake Union totaling hundreds of thousands of individual aircraft operations tells us that existing wind shear, down drafts, and turbulence at the south shoreline already impacts aircraft performance and reduces the altitudes aircraft can gain over existing structures. Even utilizing the longest designated runway on the lake aircraft are often no higher than 200-250 feet at the southwest shoreline. Tall buildings of various floor plate sizes that are specifically placed along the horizontal edges of the established flight path will be expected to further impact existing operations in those categories noted in the DEIS conclusions above. The

4

need to quantify these impacts is necessary in evaluating appropriate vertical safety buffers within the horizontal limits of the flight path.

4 cont

### 3. Wind Analysis Mitigation

In the Mitigation Strategies section (3.8.3) only two have *significant* mitigation value. These two include limiting building heights within the horizontal flight path area and the establishment of a vertical safety buffer. Both of these measures serve the same purpose and intent—namely to ensure safe clearances between departing aircraft and obstructions on the ground. As listed here, however, they have little efficacy. Neither offers a specific number for an acceptable building height or vertical safety buffer.

5

In the absence of quantitative analysis the only measure that can ensure the safety of residents and aircraft operators is a zoning overlay that restricts further building heights. Kenmore Air strongly urges the City of Seattle to engage in a dialog with WSDOT Aviation that would offer the parameters for a zoning overlay within the horizontal limits of the flight path. This zoning overlay would restrict future building heights within the horizontal flight boundaries to existing zoning heights or, if an aircraft performance based wind analysis indicates safety of flight can be maintained, then a safety buffer could be established below the 20-1 approach/departure surface of FAR 77.

### 4. Wind Analysis Summary Mitigation (p.3.8-52)

All three of the conclusions, and most specifically the first two in this section are accurate and comprise the fullest measure of mitigation for any increases in building heights in South Lake Union. These measures, however, are only found in Alternative 4 and to a lesser degree Alternative 3. Thus, any consideration for the adoption of Alternatives 1-3 which places taller buildings closer to the shoreline and/or adjacent to the horizontal limits of the flight path must include the adoption of the zoning overlay suggested above as a necessary measure to maintain the safety of future flight operations within the described departure area that will now experience increased wind shear, turbulence and down drafts.

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### 5. Noise/Quality of Life Impacts

The DEIS provides no analysis of the likely impacts of noise and the perceived fears from residents as a result of the proximity of flight to residential and commercial buildings. Our national airspace system has countless examples of communities that build up around an existing airport and find themselves at odds with the impacts of these flight operations. Existing airport operators, municipalities and residents can spend untold legal expense and time while engaged in these conflicts. In the event that zoning is accepted for taller buildings in the immediate area near the flight path, the City should

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require developers to provide the existing seaplane operators an Avigation Easement. These easements simply serve to notify residents that they cannot initiate nuisance claims against the seaplane operator for conducting legal and normal flight operations. These Avigation Easements and Notice on Title are successful and proven tools in preventing future conflicts.

7 cont

Last, Kenmore Air is again appreciative of those efforts made by the City to account for the historical and existing flight path in all of the alternative zoning options. The more detailed analysis and suggested mitigation cited in this letter is viewed as necessary to ensure the greatest measure of safety for aircraft and community residents.

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Please do not hesitate to include Kenmore Air in any discussion, review and analysis of these issues. Our interest remains first and foremost to preserve the safety of flight operations and the current and future resident quality of life. We welcome any opportunity to input on these issues.

Sincerely,

KENMORE AIR HARBOR, INC



Tim Brooks  
Vice President, Flight Operations

Brumbaugh & Associates

April 10, 2011

Seattle Department of Planning and Development  
Attn: James Holmes  
700 Fifth Avenue, Suite 1900  
Seattle, WA 98124-4019

RE: South Lake Union Rezone

I am writing in support of Alternative 1 of the Height and Density Draft EIS to allow additional growth in the South Lake Union neighborhood of Seattle. | 1

As the owner of a Seattle landscape architecture firm we see have seen the tremendous benefits of urban infill projects that have replaced parking lots and low density development with higher and better uses serving the community. We have also participated firsthand in the design of focal SLU projects including 2200 Westlake, the Discovery Center and Rollin Street Apartments. The Seattle area is projected to grow substantially in the decades to come. The SLU neighborhood provides an excellent opportunity to accommodate new development that is not dependent on an already maxed out transportation system. Allowing more height and density reduces sprawl and provides the critical mass necessary for a vibrant urban live/work center.

I am also on the Sustainable Sites technical advisory board for the U.S. Green Building Council helping to write new versions of LEED language. Much of the emphasis of the Sustainable Sites portion of LEED is encouraging dense urban development in areas that already have infrastructure in place such as SLU.

Thank you considering my comments. I look forward to a prosperous future for South Lake Union.

Sincerely,



Mark Brumbaugh

**THE**  
**BUCK**  
**LAW GROUP**

Peter L. Buck

April 11, 2011

SENT VIA EMAIL and FIRST CLASS MAIL

Mr. Jim Holmes  
Department of Planning & Development  
City of Seattle  
P.O. Box 34019  
Seattle, WA 98124-4019

RE: South Lake Union - Draft EIS Comments

Dear Mr. Holmes:

This firm represents the owners of the properties at 1000 and 1100 Dexter Avenue North, located in the South Lake Union panhandle (i.e., that portion of South Lake Union north of Valley Street, east of Aurora Avenue North, and west of Lake Union).

First, we again commend the City and its planning staff for the significant efforts expended to date in redesigning South Lake Union neighborhood. It has invaluable potential to become a more vibrant and sustainable neighborhood, and is a key location for a significant portion of the City's future growth. As one of six designated urban centers targeted for future growth, it holds the potential for the greatest impact on the City Center and surrounding neighborhoods providing commercial and residential capacity for the City. Our client, and numerous other residents and neighbors located in the South Lake Union panhandle, look forward to a thoughtfully vetted design that takes into account the unique aspects of each portion of the neighborhood.

Accordingly, we submit these Draft EIS comments, including several suggested refinements to the proposed alternatives, for your consideration in developing the FEIS. Because our client's properties are situated within the South Lake Union panhandle, we are limiting the scope of our comments to certain aspects of the alternatives as they affect the panhandle portion of the neighborhood.

1

## DRAFT EIS – RECOMMENDED REFINEMENTS

### Introductory Overview

It is our position that with some modifications, Alternative 1 provides the greatest possibility for achieving the numerous goals outlined in the Draft EIS. As recognized in major cities across the continent and elsewhere, population growth is best suited to occur in urban centers designated for growth. Growth best occurs with the benefit of thoughtfully crafted zoning requirements which recognize the unique characteristics of every neighborhood while also transitioning growth neighborhoods into centers designed for more heavily populated city living. The redevelopment of South Lake Union is no different, and represents a critical opportunity to shape growth in the City of Seattle consistent with the goals as carefully outlined in the Draft EIS which originate from the City's Comprehensive Plan.

2

Alternative 1 comes close to meeting the goals referenced.

However, we respectfully request additional consideration of the following factors unique to the panhandle of the South Lake Union neighborhood. These factors require modifications to the proposed Alternatives 1 & 2 as they pertain to residential development within the panhandle, and slightly greater modifications to the proposed alternatives as they pertain to commercial development within the panhandle. However, these modifications would provide for exponential increase in positive impacts for quality of life and activity in the panhandle and neighboring areas.

3

#### 1. Development in the Panhandle Should Preserve Unique Characteristics

The panhandle segment of South Lake Union has some unique characteristics, distinguishing it from other portions of South Lake Union in several key ways. The Draft EIS recognizes these characteristics in part. However, none of the proposed alternatives appropriately account for the unique topography, purpose and character of this area as a key transition zone requiring a more thoughtful approach. A description of the key characteristics requiring further consideration follows.

#### Key Benefits of Dexter Avenue as Designated Seattle Scenic Route Providing Key Access to the City Should be Preserved

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First, Dexter is a designated Seattle scenic route (see DEIS 3.10-43). Despite this designation and city ordinances which require consideration of scenic routes from which view protection is to be encouraged, the DEIS omits completely any analysis of views or view protection from Dexter. Dexter is a thoroughway between downtown and important neighborhoods providing key residential capacity for a significant portion of downtown employees. Dexter serves as key scenic and access route between downtown, passing through the east side/lower Queen Anne, and finally providing access to Fremont and surrounding neighborhoods via the Fremont Avenue bridge, or wrapping around further into Nickerson and providing access to North Queen Anne and then Ballard and surrounding neighborhoods via the 15<sup>th</sup> Avenue bridge. Dexter is a heavily used route into and out of downtown from these neighborhoods north of Seattle City Center, along with Aurora/Hwy 99, 15<sup>th</sup> Avenue NW and Westlake.

As such, development of the zoning along this route must consider that it is an important scenic route and view corridor, and one of few routes east of Queen Anne that offers views of Lake Union,

which is also a protected view. (See DEIS 3.10-41 and SMC 25.05.675 P2a which states "it is the City's policy to protect public views of significant natural and human-made features: Mount Rainer, 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 the specified viewpoints, parks, *scenic routes*, and view corridors ...") Though development along this route to date has blocked portions of the Dexter Avenue corridor view, the City cannot allow views from this scenic drive to be destroyed in their entirety. As it exists now, there are numerous vantage points from the Dexter Avenue corridor providing scenic views of Lake Union. These views are critical to the Dexter Avenue corridor, both as a designated scenic route, but also as a transition zone between residential districts and what will be a heavily developed South Lake Union commercial and residential neighborhood. It is imperative that the City preserve light and open space to protect this scenic drive as well as to preserve the future of this panhandle neighborhood as a pedestrian-friendly district.

4 cont

#### **Development in the Panhandle Should Respect Neighboring Areas**

Second, as is recognized, but not fully considered in the DEIS, the panhandle section of South Lake Union abuts lightly developed neighborhoods including lower Queen Anne and the area extending north along the west side of Lake Union (see 3.10-20, where a "wall of building" could greatly adversely affect neighbors in "areas now only very lightly developed such as the ... Dexter Avenue corridor north of Mercer Street"). These areas, unlike the Denny Triangle and the remainder of South Lake Union, will not see the kind of growth and development for which South Lake Union is targeted. Consequently, this area of transition must be treated appropriately as a transition between two very different types of neighborhoods.

5

Quoting the DEIS (at 3.10-3):

Height, bulk and scale relate to the size of buildings and their relationship to neighboring structures. The City's SEPA policies recognize that physical characteristics of buildings affect the character of neighborhoods. *These policies also recognize a need to address building height, bulk and scale as a means to achieve appropriate transition from one zoning district to another.* [Emphasis added.]

As an area of transition, development in the panhandle must occur in a way that gradually combines elements appropriate for this area while also mitigating the adverse impacts recognized in the DEIS which are not yet appropriately accounted for as required by SMC 25.05.675 (describing mitigation alternatives). This includes topographical considerations as they relate to the adverse impacts development along the west side of Lake Union could have on Queen Anne and other nearby neighbors. This can be done, as suggested herein, with only minor changes to the proposed alternatives as they exist now, and only as they pertain to the panhandle, which, though a small portion of the South Lake Union neighborhood is a critical transition area.

Further analysis pertaining to Height, Bulk and Scale, affecting *aesthetics and neighborhood character*, follow below.

6

### Unique Street Formation in the Panhandle Should Be More Carefully Considered

6 cont

Third, street formation in the panhandle requires careful consideration when reviewing height, bulk and scale requirements, specifically as they relate to *podium heights* and *commercial development*. These elements of future development provide the greatest potential for adverse impacts and the possibility for a "wall of development" that eradicates current benefits of the neighborhood.

The traditional street grid is interrupted in a key portion of the panhandle where double blocks exist. As a result, this formation has the unique potential to cause significant blockage, dark canyons, shadowing, and a general lack of light and aerial open space should a wall of development be allowed to pervade this area. (See DEIS 3.10-18 acknowledging this risk in "the double length blocks along Dexter Avenue N. between Aloha and Galer Streets where the street grid is interrupted.") This outcome would be wholly inconsistent with the goals of Seattle's Comprehensive Plan which are specifically addressed in the Draft EIS. Although the Draft EIS (at 3.10-3) recognizes that because of the street grid interruption in this area, podium heights have the potential for the greatest impact (i.e. detrimental impact) within these double blocks, the proposed alternatives do not then continue the analysis of impacts by modifying podium heights appropriately for this unique area.

Bread-loaf type of commercial development is still permitted under the proposed alternatives, allowing commercial buildings a footprint of 24,000 square feet, and under Alternative 1, a height of up to 240 feet. This type of structure, if built all along the panhandle, would have significant associated adverse impacts which would negatively impact the Dexter Avenue corridor as a scenic drive, and lightly developed residential area. This type of commercial build out would also destroy the future ability to create a vibrant, pedestrian-friendly zone. The podiums permitted at the base of residential towers pose the same threat to a slightly less extent – that of eliminating light, creating shadows, destroying the scenic route views from Dexter and neighboring areas, decreasing the walkability of the area, and failing to meet urban design principles. It is time for Seattle to move towards more slender towers and away from blunt office buildings, and the panhandle provides the perfect opportunity to implement that concept.

If a vibrant, pedestrian-friendly zone is truly going to be developed alongside the Dexter Avenue corridor and Lake Union, the City should take additional steps towards preserving light, view corridors, vistas from Dexter Avenue as a scenic route within the city, and guard against shadows, dark canyons, and other byproducts of development that occur without the level of thoughtfulness required here.

### Modifications to the Panhandle in Proposed Alternatives 1 & 2

Considering that 1) the Dexter Avenue Corridor is a scenic route, 2) the area along Dexter is a transitional area between residential and mixed use neighborhoods, and 3) the risks of key adverse impacts related to the panhandle and its unique street grid are so high (involving loss of light, loss of aerial open space, creation of shadows, and other impediments to pedestrian-friendliness), the development in the panhandle must be treated with greater care than has occurred to date. As we have stated since the beginning of this process, we support the proposed increases in building height for residential structures within the panhandle – this transitional area *should* lean more heavily towards residential development - but podium heights and widths and commercial "bread-loaves" should be restricted.

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Specifically, **podium heights in all proposed alternatives should be limited to 2-3 stories of street-level retail and residential development**, moving away from bread-loaf bulkiness that detracts from walkability, instead creating more open space, and preserving solar access and view corridors throughout the neighborhood. Development patterns in Vancouver, B.C., show that residential pin towers can be an impressive way to achieve increased residential density while preserving light and limiting shadows. This is precisely the model we should be following here. Taking this concept a step further, the residential tower height could even be increased above the 300 feet proposed in Alternative 1 to maximize housing benefits with little additional impact.

8

Furthermore, **the maximum floor plate size for commercial structures located within the Panhandle should be decreased to avoid a wall of buildings that will greatly restrict light and choke off public views. This is particularly important with the prevalence of long, relatively narrow blocks that exist in this unique section of South Lake Union.** If necessary, implementing a minimum tower spacing requirement, façade setbacks and a reduction in off-street parking requirements should be considered as a way to accomplish this goal. Further floor plate and bulk limitations should also be contemporaneously considered.

9

To the extent that this transitional area can favor greater residential build-out, the goals of the Draft EIS could be more effectively achieved as they pertain to the panhandle and the City at large.

## **2. Opportunity to Address City Housing Needs through Modifications to Alternatives, Appropriate for the Panhandle as an Area of Transition**

10

One of the greatest goals of the City of Seattle is, and will continue to be, to develop greater density and residential capacity within the City limits. The City of Seattle has lagged far behind other leading cities in its ability to achieve this goal and meet residential demand through careful planning and urban design concepts. The redevelopment of South Lake Union offers the City a perfect opportunity to implement the best possible scenario through careful attention to priorities at this critical stage.

Because the panhandle is such a unique area of transition, located along a designated scenic drive within the City between residential and commercial districts, it offers itself as a prime location for future residential development that can occur in accordance with modern design principles allowing for the existence of light, pedestrian friendly features including ground-level retail space, aerial open space, view corridors, and reduction of shadows. Careful design and planning to retain these benefits is especially critical in this area involving exceptionally long city blocks which are inconsistent with the traditional street grid. In the panhandle area of South Lake Union exists the greatest potential for creating long, dark and oppressive urban canyons, an outcome which must be avoided by decreasing the size of podiums and commercial bread-loaf style building alternatives.

## **3. Proposed Modification to Alternatives Would Better Meet the Following Specific Urban Village Strategies and Goals, consistent with the City's Comprehensive Plan**

11

In addition to furthering general goals involving 1) preserving views from a designated scenic route within the City of Seattle, 2) providing for increased housing capacity within urban centers to meet both current and future housing demands, 3) providing for greater livability through pedestrian friendly mixed-use residential and commercial centers and nodes, and 4) increasing the vitality, aesthetics and

efficiency of urban areas targeted for growth, the modifications to the proposed alternatives as described herein would help the City in meeting the following goals specifically outlined in the Draft EIS (comments follow each goal):

11 cont

Urban Village Element:

Policy UV3 – 1: [To achieve] Clearly defined geographic boundaries that reflect existing development patterns, functional characteristics of the area, and recognized neighborhood boundaries.

*Comment:* As described above, the panhandle is an area of transition between residential and mixed use neighborhoods within the City. That fact, as well as the stated policy of the City to preserve scenic drives, and views of significant natural features, including Lake Union, makes the panhandle more suitable for a higher ratio of residential development. The proposed alternatives should accordingly allow for build-out of residential pin-towers with lower podium heights and place restrictions upon the footprints of commercial buildings to avoid a wall of commercial bread-loaf style bulkiness.

Urban Center Goals:

Goal UVG17: Guide public and private activities to achieve the function, character, amount of growth, intensity of activity, and scale of development of each urban village consistent with its urban village designation and adopted neighborhood plan.

*Comment:* Development within the panhandle should be guided by its unique location and topography and preserve light, space, and walkability. This is consistent with modern concepts governing design and development in vibrant, residential urban areas.

Distribution of Growth:

Goal UVG30: Encourage growth in locations within the city that support more compact and less land-consuming, high quality urban living

*Comment:* Again, it is imperative that the City move away from bread-loaf style commercial development; particularly in the panhandle as a transition zone, a wall of buildings on double blocks should not be permitted.

Land Use Element:

Goal LUG17: Create strong and successful commercial and mixed use areas that encourage business creation, expansion and vitality by allowing for a mix of business activities, while maintaining compatibility with the neighborhood-serving character of business districts, and the character of surrounding areas.

Goal LUG18: Support the development and maintenance of areas with a wide range of characters and functions that provide for the employment, service, retail and housing needs of Seattle's existing and future population.

*Comment:* The character of the areas near the panhandle is residential, lightly developed, and distinctly different from the character of areas near the remainder of the South Lake Union neighborhood. The build-out in the panhandle should reflect this transition and be respectful of neighbors by retaining key elements involving space, light and quality of life in an urban residential area.

11 cont

Housing Element:

Policy H2: Maintain sufficient zoned development capacity to accommodate Seattle's projected share of King County household growth over the next 20 years.

*Comment:* The panhandle, as an area providing transition between commercial and residential districts, is most appropriately developed with a higher ratio of residential pin towers with low podium heights to achieve the goal of accommodating both current and future demands for housing while still providing for retail interests, vitality and walkability at the ground level. South Lake Union, and the panhandle in particular could provide a strong supply of additional housing.

Neighborhood Planning Element:

Policy SLU-P2: Promote diversity of building styles and support the diverse characters of neighborhood sub-areas.

*Comment:* Development in the panhandle should be guided by the City so as to reflect its unique character, and to create diversity both within South Lake Union as a neighborhood and the City at large. Pin towers with minimal base sizes would provide for this solution.

Seattle Pedestrian Master Plan Objectives:

Objective 2: Improve walkability on all streets.

Objective 5: Create vibrant public spaces that encourage walking.

*Comment:* Retaining light, aerial open space, and views from Dexter of Lake Union, while minimizing bread-loaf type of development, will contribute to preserving walkability and creating vibrant public spaces that encourage walking within and through this district. Pedestrian-friendly development requires optional routes through a district or zone that emphasize light, view and pedestrian corridors, optimum setbacks, and pockets of open space. This means that bread-loaf style development, long solid "walls of building" or development, and deep, dark canyons and shadows must be avoided.

Neighborhood Character:

Strategy 2a: Support the key characteristics of neighborhood sub-areas.

Strategy 2c: Use additional height and density as an incentive for projects that implement multiple neighborhood plan policies where the additional height will not negatively affect the surrounding area, flight paths or key public view corridors.

11 cont

*Comment:* The only way to preserve key public view corridors from Dexter, light and pedestrian friendly elements also affecting nearby areas, is to reduce the size of podium bases for residential towers, and reduce the size of the footprint allowance for commercial buildings, so as not to create the wall of buildings that would eliminate all the current benefits of living in and passing through the panhandle.

#### 4. The Final Alternative Needs to Preserve Westlake Steps as a Public Amenity

Carr America presented a plan for Design Commission Review dated December 7, 2006. It involved development of property between Dexter Avenue North and Westlake Avenue North surrounding Highland Drive (project otherwise known as "Westlake Steps"). On page "i" of their submission entitled "Petition to Vacate Highland Drive," they provided a project overview which states in relevant part:

12

The Petitioner for this street vacation is CarrAmerica Dexter Avenue, LLC. They wish to vacate Highland Drive (bounded by Westlake Ave. N and Dexter Ave. N in the South Lake Union Neighborhood) and create a substantial public benefit for the South Lake Union Neighborhood. This benefit will be the creation of a public pedestrian connection akin to Seattle's Harbor Steps, a vibrant, open, public amenity with retail, a variety of outdoor seating options, landscaping, and numerous vantage points for the enjoyment of South Lake Union views. This amenity will enhance the connection between Queen Anne above and South Lake Union below the project site. It will create a destination, a heart within the South Lake Union Neighborhood. ...

They continued to describe current conditions as follows:

... Highland currently does not provide vehicular connection between Dexter and Westlake nor does it provide pedestrian access. If the Petitioner is granted the right to vacate Highland Drive, a public amenity will be developed on the site to accommodate pedestrian traffic across the site and to facilitate connection between Queen Anne hill and South Lake Union.

On page "iv" of the same document, the following was presented as a preferred option for development of what was called Westlake Steps:

Option Two: The preferred Option. The following graphics capture the essence of the proposed public amenity. As is depicted, a ramp will be provided that will assist in addition to the cascading stairs. This ramp will allow wheelchair and bicycle access between Dexter and Westlake. In addition, this ramp will create a tiered viewing opportunity – over the Lake, and over the steps below. The pedestrian connection will be a prime location for dining, access to retail, casual meetings, enjoyment of South Lake Union and much more. This heart will create vitality to enliven the site and the community as a whole.

Mr. Jim Holmes  
April 11, 2011  
Page 9 of 9

Attached to this letter as Exhibit A are two figures found on that page.

Subsequently, an approval was granted for development of a building on Westlake Avenue North just to the south of Highland Drive. It is important in looking at this subarea that podium heights and building heights and bulk be substantially limited so that this promised amenity not be turned into a dark canyon. It is imperative that the City preserve light and airspace for this pedestrian zone.

The Final EIS should examine the impacts of podium heights and commercial floor plates in this area.

It is certainly likely that future site specific development will attempt to point to this EIS process as having completed SEPA review. That being the case, this SEPA review needs to specifically address this major promised amenity.

### Conclusion

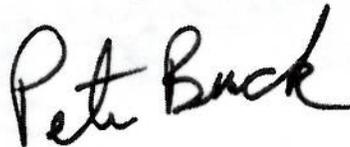
In summary, Alternatives 1 and 2 should be modified to allow podium heights on residential towers to extend only to a maximum of 2-3 stories. Furthermore, commercial buildings in this area should be restricted through minimum tower spacing requirements, façade setbacks, reductions in off-street parking requirements if necessary, and additional floor plate and bulk limitations.

Seattle's highest priority within the panhandle should be to avoid the risk of a massive wall of buildings on long, double blocks, moving away from the bread-loaf style of development that pervades so many cities, restricting light, views and livability. Residential pin towers with more moderate bases of 2-3 stories would preserve light, support long-term viability, maintain portions of scenic views from the Dexter Avenue corridor to Lake Union, and protect the relationship of the panhandle as a transition area between the lightly developed, residential districts and the rest of South Lake Union extending to the Denny triangle, uptown and into downtown.

Thank you very much for your consideration of our additional comments. The redevelopment of South Lake Union holds tremendous potential and long-term impacts for downtown, and surrounding neighborhoods of Seattle. We hope you will carefully review these proposed modifications and revise the alternatives accordingly as they pertain to development within the panhandle.

We look forward to working with the City as this process continues and appreciate your ongoing efforts.

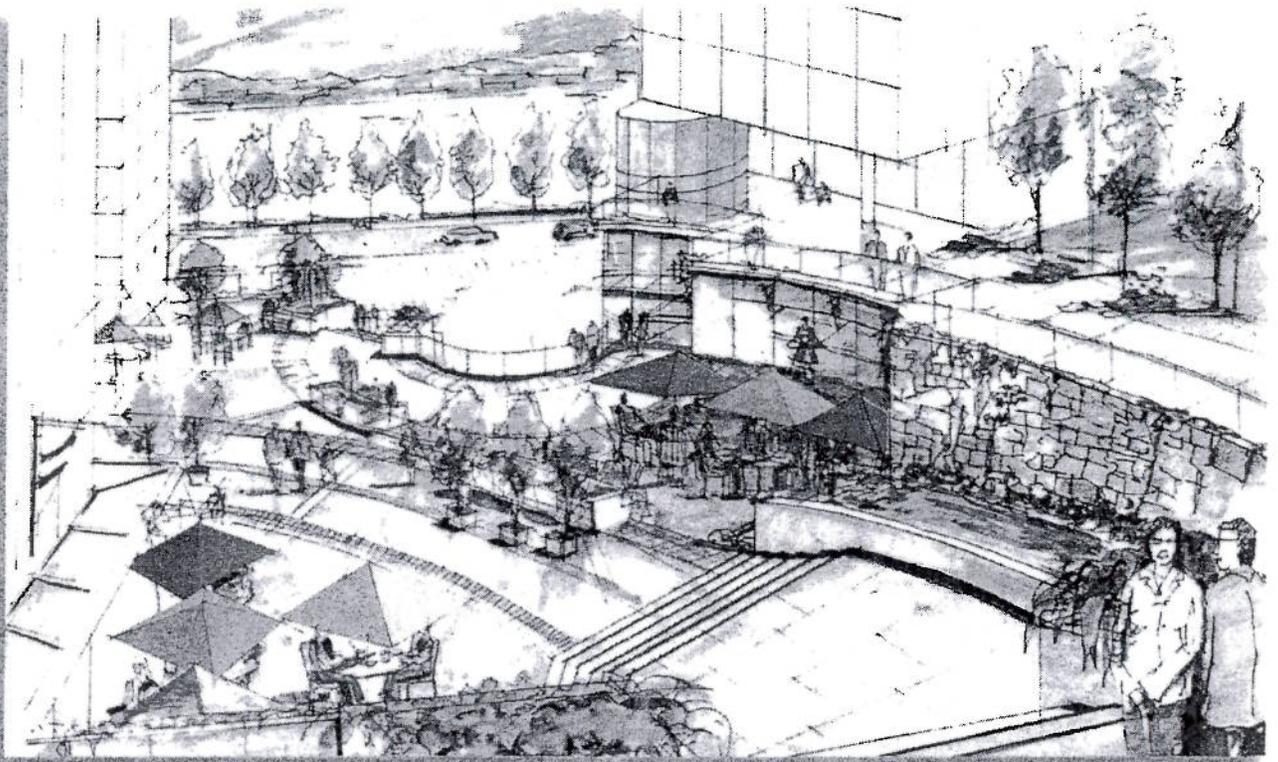
Sincerely,



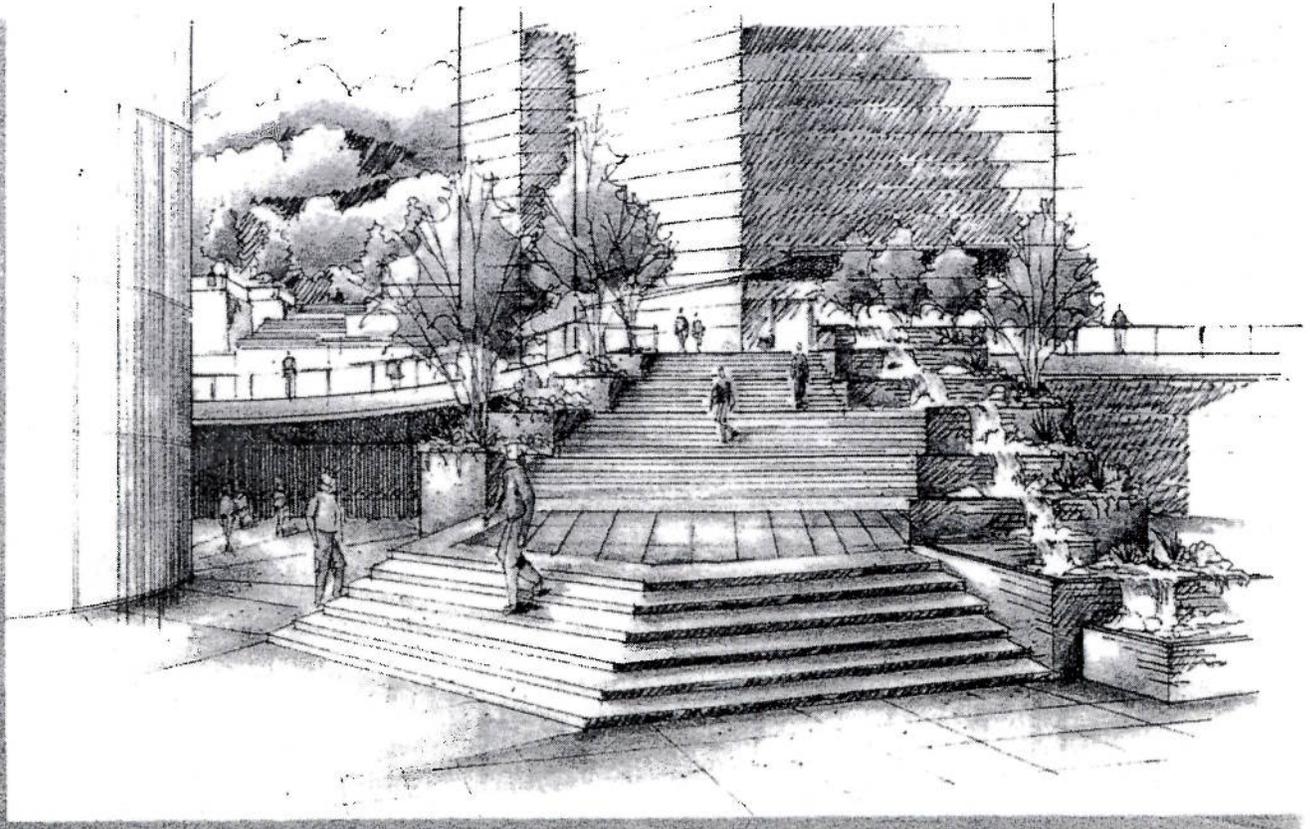
Peter L. Buck  
Attorney for Owners of 1000-1100 Dexter Avenue N.

12 cont

13



OPTION 2 VIEW FROM DEXTER LOOKING EAST



OPTION 2 VIEW FROM WESTLAKE LOOKING WEST

Holmes, Jim

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**From:** Thomas Buford |  
**Sent:** Saturday, March 12, 2011 5:34 PM  
**To:** DPD\_Planning\_Division  
**Subject:** SLU Zoning

To whom it may concern,

I live and work in the city of Seattle (Ballard and Downtown, respectively). I am highly in favor of increasing the height and density in South Lake Union. A vibrant, bustling city needs residents and workers. If we do not increase our capacity as a city to grow, those talented, dynamic citizens and business leaders will move on to other places. South Lake Union is a perfect place for the city to grow - it is beautiful, central, and, perhaps most importantly, already growing. Seattle is a great city and South Lake Union is making the city a better place to live and work. We should encourage South Lake Union's growth and celebrate the vibrancy it brings to our city. | 1

Thank you,

Thomas Buford

April 1, 2011

Seattle Department of Planning and Development  
Attn: Jim Holmes  
700 Fifth Ave., Suite 1900  
Seattle, WA 98124

Dear Sir:

I am a resident of South Lake Union and am writing concerning the impacts the DPD are considering regarding the heights of future buildings in SLU. Please don't increase the growth targets for SLU to extend the downtown densities all the way to Lake Union. Statistics show that more young people are moving back to the cities. They will want schools and family friendly housing.

| 1

Also, please consider the views of Lake Union. High rises will block the views of existing buildings. Maintaining a real step-down to the lake will save these views.

| 2

We are encouraging Mass Transit to the City. We already have gridlock on Fairview at peak commuting times. Alternatives #1 and #2 would cause unacceptable traffic in our neighborhood.

| 3

Please consider maintaining the current zoning in our very unique Cascade neighborhood.

| 4

Thank you,

William and Gloria Burch

Holmes, Jim

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**From:** Henry & Olga Butler  
**Sent:** Tuesday, April 05, 2011 3:13 PM  
**To:** DPD\_Planning\_Division  
**Subject:** Rezoning issues

As residents in the South Lake Union area we attended the recent meeting and were astonished to hear how little attention was given to the needs of a livable neighborhood and so much emphasis devoted to crowding as many high rise towers as possible into this area.. High rise towers are unsuitable to accommodate low income families with children and have not been successful wherever they have been tried Alternatives 1 & 2 are totally incompatible with the desire to provide an incentive to move into this area with already overburdened traffic, extremely heavy on Denny and Fairview, lack of a public school and library, etc. The attraction of Lake views would disappear for a large part of the surrounding area residents including the 500 residents at Mirabella who may not see Lake Union from their apartment but can enjoy it from the 10th floor dining room.

Any contemplated rezoning should not destroy the existing values but find a reasonable compromise between the existing parameters and alternative #3.

We urge your full consideration of the impact rezoning will have on this neighborhood. Thank you.

Olga and Henry Butler

Holmes, Jim

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**From:** Allegra Calder  
**Sent:** Friday, March 18, 2011 2:08 PM  
**To:** Conlin, Richard; Rasmussen, Tom; Bagshaw, Sally; Burgess, Tim; Godden, Jean; Clark, Sally; Licata, Nick; Harrell, Bruce  
**Cc:** DPD\_Planning\_Division; Holmes, Jim  
**Subject:** Support the Alternative 1 Rezone in SLU

Dear City Council Members,

I'm writing to encourage you to support the Alternative 1 Rezone in South Lake Union with 35,000SF Technology Office Floorplates. Life Sciences and Global Health are critical economic drivers for our region and many of these institutions have expansion plans. Unfortunately, the DEIS contemplates towers with a maximum of 24,000SF commercial office floor plates, which are inadequate for many users. We need to build the kind of space our growth companies want, or they won't stay here.

I am a resident of Eastlake and have watched the evolution of South Lake Union over the past few years. The development of residential, commercial, lab, office and retail space has been tremendous and we should support continued growth and development. In exchange for 35,000SF floorplates, developers could be asked to provide street level amenities and public open space, break up larger blocks, and limit overall height.

We are fortunate to have thriving and growing companies and institutions in South Lake Union; I encourage you to support Alternative 1 Rezone.

Thank you for your consideration.

Best Regards,

Allegra Calder

April 8, 2011

Mr. Jim Holmes, Senior Urban Planner  
City of Seattle Dept. of Planning and Development

Public Comment on South Lake Union DEIS

Mr. Holmes,

As a seaplane pilot working on Lake Union, I have two serious concerns regarding the proposed increase in building heights around south Lake Union. The first (and most serious) concern is for the safety of seaplane operations on the lake and the second concern is for the noise impact (for Eastlake) that will result if tall buildings are located along or near the south shore.

All seaplane operations on Lake Union are bounded by safety and noise concerns. The approach and departure paths/profiles are to ensure safety of persons (both in the aircraft and on the surface) in the event of engine failure. Aircraft taking off to the south and departing to the west must attain a safe altitude before crossing over the southwest shoreline en route to Elliot Bay. The aircraft continues to climb until midway between waters. This is to ensure that the aircraft could glide to water (Lake Union or Elliot Bay) in the event of engine failure. Buildings along the south shore of Lake Union would *eliminate* or severely hinder an emergency return to Lake Union if an engine failure occurred. This is a grave concern to me as a pilot.

1

When aircraft are departing to the south and cannot attain enough altitude to make a safe crossing to Elliot Bay (or when they are departing to the north and east) they will turn in the direction of Elliot Bay for a short time and then perform a climbing left turn to the north *always keeping Lake Union close enough to glide to in the event of engine failure*. The proposed zoning would allow buildings to be placed directly in this route. The only solution would be to perform a turn prior to encountering the south shoreline, which would be at a dangerous (much lower) altitude. Maneuvering an aircraft at low altitude would be made even more unsafe with the wind perturbation (wake turbulence) that would result from tall buildings along the south shore.

Noise has always been a concern for seaplane operations in and around Lake Union. The proposed changes would result in low altitude maneuvering along the south shore and lower altitude climbs (full engine power, maximum noise) along the east shore. If the airplane is performing this climb at an altitude that is half as high as is currently done, the noise would be twice as great (conservative estimate—my feeling is that the altitude would be only 1/3 as great making 3X the noise).

2

I am writing this comment because rezoning to allow tall building along the south shore of Lake Union poses a significant safety threat for seaplane operations. I ask that the decision be made to keep Lake Union as safe as possible for seaplane operations and not rezone higher buildings along the south shore.

3

Sincerely,

Gregory Carlin,  
Flight Instructor, Charter Pilot, Seattle Seaplanes

**Clafin, Jenny**

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**From:** Robert Cesternino [rob@citadelsecurity.org]  
**Sent:** Wednesday, March 30, 2011 1:05 PM  
**To:** DPD\_Planning\_Division  
**Subject:** South Lake Union EIS  
**Attachments:** SLU Letter.doc

Attached are my comments relative to the SLU Height & Density EIS.

Robert C Cesternino  
CEO  
Citadel Security Services  
315 Deaderick Street  
Suite 125  
Nashville, TN 37238  
615-259-5770-office  
615-736-5797-fax  
615-405-4342-cell

City of Seattle  
Department of Planning and Development  
700 Fifth Ave- STE 2000  
P.O. Box 34019  
Seattle, WA 98124-4019

Dear Sir or Madam-

This letter is intended to address the **South Lake Union Height & Density Draft Environmental Impact Statement** and my feelings relative to same.

I am a former Mercer Island resident who has relocated to the Nashville, Tennessee area. I own a business and still have a Downtown Seattle office and I spend one (1) week a month in Seattle at a minimum. When in Seattle, I take full advantage of the myriad of quality of life opportunities offered. My wife and our children spent the entire summer of 2010 in Seattle. While we reside in Tennessee for the moment, whenever asked where we are from our answer is ALWAYS; *Seattle!* Our youngest daughter, a high school sophomore, fully intends to return to Seattle upon graduation to attend UDUB. We are loyal Husky fans who to this day, retain our season tickets to UDUB football. Seattle is where my wife and I intend to spend out twilight years.

Since relocating to the Nashville area, I have been elected to the City Council of a Nashville suburb and also serve as a member of the Board of Zoning Appeals not to mention other various Boards and Committees. I believe one of the keys to my successful election as a relative newcomer to both politics and Middle Tennessee was what I offer being from Seattle. My moderate, community and family quality of life focus is an attribute I attribute to living, working, playing and worshipping in the greater Seattle area.

Having watched South Lake Union from its infancy to now, I am amazed at how well the project has served to foster a true feeling of "community". All one has to do is to spend some time in the area and observe how well environments of business, personal and retail/restaurant have been woven together to create a safe, relaxed area which already can be listed as one of the greatest areas of character in Seattle. Having eaten dinner at a friend's and watched the "Boats Afloat" show and seeing float planes take off and land on South Lake Union, I can attest to its unique character.

I fully support re-zoning of this area to allow additional height and density from two (2) aspects; my personal feelings as someone who uses this area and as someone who currently holds an elected position in an area of the United States that is currently experiencing positive growth and the challenges that go with that growth.

Personally, I believe that re-zoning in this area will foster growth which will lead to more people, which will lead to more amenities, increased focus on forward thinking green building solutions, an increase in the use of public transit as well as bikes and foot traffic which in itself serves to reduce vehicle emissions. This growth could also lead to increased use of the existing parks in the SLU area. I also envision a South Lake Union Elementary and High School to be built using state of the art cutting edge green technology that supports joint education projects with the likes of Fred Hutch, the Gates Foundation and the other biotech and science leaders who call South lake Union home. I foresee buildings with garden projects on the roofs and a farmers market where some of the organically grown products are sold.

From the position of an elected official and someone who has specific zoning appeals experience, I see a tremendous opportunity for the City of Seattle to use existing infrastructure to create a green centric (low-carbon lifestyle), walkable neighborhood where special attention has been paid to preserving the waterfront views, characterized by parks, state of the art buildings with an aesthetically pleasing skyline that has the potential to reduce stormwater run-off (another unfunded federal mandate) while at the same time could result in a cumulative tax revenue estimated to be in the neighborhood of **\$1.3 BILLION** from 2005-2025 (as the financial stewards of the City of Seattle, that number alone should be enough to make the City Council stand up and take notice).

2

I urge each and every member of city government involved in this decision to take the time to visit SLU. Don't make a decision sitting in a conference room looking at a bunch of slides and renderings. Get out into the neighborhood, take your family there for a meal and get a true feel for the neighborhood. Since being elected I have seen too many instances of planning and zoning issues being decided without a "true feel" for the project. If you do this, I have no doubt you will come away as big a supporter of additional height and density zoning as I am.

3

I would like to thank you, in advance for your attention to this correspondence and the job that you do.

Sincerely-

Robert C Cesternino  
CEO  
Citadel Security Services  
2001 Sixth Ave  
STE 1700  
Seattle, WA 98121

Holmes, Jim

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**From:** Marjorie Chadsey  
**Sent:** Monday, April 11, 2011 10:09 AM  
**To:** DPD\_Planning\_Division  
**Subject:** Plans for Further Development of South LakeUnion

As I write as a resident of South Lake Union I feel very strongly that the strength and beauty of Seattle lies in its local communities not in its crowded downtown skyscraper-filled areas. | 1

Let's save South Lake Union from tall view blocking buildings and keep the parks, churches, housing and small entrepreneurs alive and well. Everyone should be able to enjoy the beauty of Lake Union, the hills nearby and the distant mountains. Please don't spoil it!

Marjorie Chadsey

**Holmes, Jim**

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**From:** John and Maryann Chandler  
**Sent:** Monday, April 11, 2011 6:01 PM  
**To:** DPD\_Planning\_Division  
**Cc:** John Chandler  
**Subject:** SLU EIS Comment

I am writing to note my overall approval for Option #1 in the SLU EIS. I have worked in the SLU neighborhood for four years and believe that this is the best alternative in providing a balanced approach to growth. It is important that the density is appropriate and that view corridors are balanced. The importance of providing a strong multi-modal transportation system is paramount as well. | 1

*John Chandler*

Holmes, Jim

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From: Karson Clancy [karson@gmail.com]  
Sent: Friday, April 01, 2011 9:32 AM  
To: DPD\_Planning\_Division  
Subject: Comments on the SLU Environmental Impact Study

I work for Amazon.com at South Lake Union. Our offices were relocated to SLU about a year ago. Over the course of the past year the area has dramatically improved with new amenities that have made SLU much more convenient and enjoyable. Because of the availability of high quality corporate office space companies like Amazon are and will continue to be attracted to the area. I believe it is virtuous to adopt Alternative 1 in order to attract even more high caliber companies and people to the area. | 1

Thank you.

--  
Karson Clancy  
[karson@gmail.com](mailto:karson@gmail.com)

Table 4-2

## Responses to Public Comments Received During the Comment Period

Comment Number	Response
<b>Letter 20: Adams, Terry and Ruth</b>	
1	<b>Objections to Alternative 1.</b> The comment is noted. Please see responses to comments in this letter, below.
2	<b>Traffic Congestion and Transit.</b> The commenter expresses concern over the level of traffic congestion and uncertainty over the future provision of transit service. Please see response to Letter 13, response to Comment 63 regarding transit. No issues are raised that would affect the outcome of the EIS.
3	<b>Open Space.</b> The comment is noted. Please note that none of the alternatives propose 400-foot building heights between Valley and Mercer Streets. Please see Final EIS Chapter 2 for a description of the alternatives.
4	<b>Views.</b> The comment is noted. Please see Final EIS Chapter 2 for a description of podium and building heights. Please see also Final EIS Section 3.4 for revised images depicting street-level and view impacts.
<b>Letter 21: Allen, Chrissy</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
<b>Letter 22: Allen, Dean</b>	
1	<b>Support Alternative 1.</b> The comments are noted.
<b>Letter 23: Alpert, Spencer</b>	
1	<b>Support Alternative 1.</b> The comments are noted.
<b>Letter 24: Anderson, Fred</b>	
1	<b>Economic Development Benefits.</b> The comment is noted. As the commenter states, the EIS does not discuss the economic benefits of the proposal. As noted in WAC 197-11-402, EISs are required to identify potential significant adverse impacts, but are not required to address beneficial environmental impacts.  Please see Final EIS Section 3.2 for a discussion of the City's Comprehensive Plan economic development policies.
2	<b>Economic Benefits.</b> The comments are noted.
3	<b>Support Alternative 1.</b> The comment is noted.

Comment Number	Response
<b>Letter 25: Archambault, Curt</b>	
1	<b>Support Alternative 3.</b> The comments are noted.
<b>Letter 26: Archambault, Curt and Carla</b>	
1	<b>Support Alternative 3.</b> The comments are noted.
<b>Letter 27: Armstrong, Sally</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
<b>Letter 28: Arrington, Alice</b>	
1	<b>Community Amenities.</b> The comments are noted. As described in Final EIS Chapter 2, a fundamental objective of the proposal considered in the EIS is to use incentive zoning to achieve public benefits, including those listed in the comment. Please see Draft EIS Section 3.16 for a discussion of open space and recreation facilities and Final EIS Section 3.6 for a discussion of schools.
2	<b>Building Heights.</b> The comment is noted. As described in the Draft EIS, the alternatives do generally decrease in height from the south boundary of the neighborhood toward the north. The one exception is Alternative 1, which includes building height increases in the block north of Mercer Street.
<b>Letter 29: Asher, Larry</b>	
1	<b>Density and Small Business Benefits.</b> The comments are noted.
2	<b>Support Density.</b> The comment is noted. As indicated in WAC 197-11-402, EISs are required to identify potential significant adverse impacts, but are not required to address beneficial environmental impacts.
<b>Letter 30: Auckland, David</b>	
1	<b>Support Alternative 1.</b> The comments are noted.
<b>Letter 31: Autry, Mike</b>	
1	<b>Support No Height Restrictions.</b> The comment is noted. Please note that the proposal would allow for increased height through the use of incentive zoning, but would not result in no height restrictions. Please see Final EIS Chapter 2 for a description of the alternatives.
2	<b>Benefits of Increased Density.</b> The comments are noted.
<b>Letter 32: Bacarella, Mary</b>	
1	<b>Views to Space Needle.</b> The concern is noted and it is acknowledged that the Space Needle is the most recognized historic landmark in the City. It is also

Comment Number	Response
	acknowledged that South Lake Union is one of the City's six designated Urban Centers where future concentrations of employment and housing are planned to occur. The City recognizes that it is unreasonable to expect that views of the Space Needle are to be protected from all of public locations without consideration of City policies regarding Urban Centers and the concentration of employment and housing. As noted in the <i>Seattle's View Protection Policies, Volume One</i> , <sup>1</sup> "[c]ompeting policy objectives– require that we consider the merit of protecting a particular view corridor with other objectives for growth management, housing development, transportation and utility infrastructure and open space."
<b>Letter 33: Bajuk, Christopher</b>	
1	<b>Positive Impacts.</b> The comment is noted. As noted in WAC 197-11-402, EISs are required to identify potential significant adverse impacts, but are not required to address beneficial environmental impacts.
2	<b>Tax Benefits.</b> The comment is noted. The referenced financial study is beyond the scope of this analysis.
3	<b>Support Greater Density.</b> The comment is noted.
<b>Letter 34: Banfill, Sally</b>	
1	<b>Height and Density Increase is Unacceptable.</b> The comments are noted. Regarding the Space Needle, please see Final EIS Section 3.4 for revised images of views toward the Space Needle under each alternative.
<b>Letter 35: Behar, Howard</b>	
1	<b>Disagree with High Rise Growth in SLU.</b> The comments are noted.
2	<b>Retain Existing Zoning.</b> The comments are noted.
<b>Letter 36: Bekins, Pamela</b>	
1	<b>Support Alternative 1.</b> The comment is noted.

<sup>1</sup> Seattle, city of; Department of Design, Construction and Land Use and the Strategic Planning Office. 2001. *Seattle View Protection Policies, Volume One – Space Needle Executive Report & Recommendations* and *Volume Two – Space Needle View Inventory & Assessment*.

Comment Number	Response
<b>Letter 37: Bennett, Don</b>	
1	<b>Public Services.</b> Please see the responses to Comments 84 and 85 in Letter 13.
<b>Letter 38: Biggs William</b>	
1	<b>Benefits of Growth.</b> The comments are acknowledged.
2	<b>Economic Development.</b> The City issued the Scoping Notice for this Draft EIS on November 18, 2008 and invited comments on the EIS scope through December 18, 2008. Through 2009, the City worked with neighborhood stakeholders to address concerns raised by the scoping comments. Based on this process, the City revised the EIS alternatives and finalized the scope of the EIS. Economic development was not included as part of the EIS scope. Please Final EIS Section 3.2 for a discussion of the City's adopted economic development policies.
3	<b>Parking.</b> Please see the Draft EIS analysis of parking in Section 3.13.
4	<b>Transportation Assumptions.</b> The Draft EIS analysis assumes all of the major road improvement projects cited by the commenter.
<b>Letter 39: Bjerke, Bruce</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
<b>Letter 40: Bjerke, Jill</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
<b>Letter 41: Boland, Bridget</b>	
1	<b>Environmental Benefits.</b> The comment is noted. As the commenter states, the EIS does not discuss the environmental benefits of the proposal. As noted in WAC 197-11-402, EISs are required to identify potential significant adverse impacts, but are not required to address beneficial environmental impacts.
2	<b>Support Increased Building Heights.</b> The comment is noted.
<b>Letter 42: Brandt, Adam</b>	
1	<b>Support Increased Density.</b> The comment regarding is noted.
<b>Letter 43: Brooks, Tim</b>	
1	The comments are noted.
2	<b>Flight Path.</b> Subsequent to issuance of the Draft EIS, WSDOT Aviation undertook additional review of the flight path. This analysis included a review

Comment Number	Response
	<p>of how seaplane lanes are utilized (including runway utilization, flight tracks, and piloting techniques), an evaluation of the aircraft fleet used by floatplane operators, and documentation of the performance characteristics of the various floatplane aircraft. Several Federal Aviation Administration (FAA) and International Civil Aviation Organization (ICAO) planning documents that have applicability in the establishment of approach/departure protection boundaries for curving approach and departure procedures such as those used on Lake Union were also reviewed.</p> <p>Based on this analysis, and in coordination with WSDOT Aviation, a revised flight path was identified (see Section 3.2 of this Final EIS). This revised flight path differs from that shown in the Draft EIS in that portions are narrower than the previous flight path, the curvature is more gradual, and the east-west legs of the flight path have shifted slightly to the north. Specifically, the southern boundary has shifted 400-500 feet north so that the southern boundary lies north of Valley Street and is generally aligned with Broad Street. The southern boundary now crosses Aurora Avenue North at about Mercer Street. Similarly, the northern boundary of the flight path shifted 200-300 feet north, crossing the Lake Union shoreline at roughly Highland Drive and crossing Aurora Avenue just north of Ward Street.</p> <p>An additional mitigation measure has been recommended in this EIS – that a project-level analysis of wind impacts be required for all new development above the base height permitted under the Seattle Mixed zoning.</p>
<p><b>3</b></p>	<p><b>Wind Analysis.</b> This programmatic EIS included a qualitative analysis of potential wind impacts. From a quantitative perspective, numerous factors will affect wind patterns in an urban area. The most critical of these are building heights, location, orientation, and massing. At the subarea level of analysis, it is impossible to accurately forecast these factors for all development in the subarea. Therefore, the programmatic analysis contained in the EIS describes a range of potential vertical and horizontal impact areas, depending on the type of development that may occur.</p> <p>At the same time, it is agreed that it is essential to conduct a quantitative wind analysis of individual development proposals to ensure that wind impacts on the Lake Union Seaport Airport are mitigated. Therefore, an additional mitigation measure requiring a project-level analysis of wind impacts for all new development above the base height permitted under the Seattle Mixed zoning is recommended. The approach to this analysis would include the following steps:</p> <ol style="list-style-type: none"> <li>1. Construct a physical scale model of the proposed project and/or the maximum building envelope allowed at that site, with the surrounding physical context (i.e., existing buildings, topography, etc.)</li> </ol>

Comment Number	Response
	<ol style="list-style-type: none"> <li>2. Install the model into a boundary layer wind tunnel and measure velocities and turbulence levels along the prescribed flight path with and without the proposed project</li> <li>3. Test for prevailing wind directions and/or wind directions that are expected to have an impact on the flight path</li> <li>4. Present resulting data in a form to allow for quantitative comparison between existing and proposed conditions</li> <li>5. Provide a written report summarizing the methodology, results and interpretation of the results against any available published aviation standards for shear layers and turbulence levels. Analysis results would require interpretation by an aviation specialist who would assess the acceptability of these specific results for the aircraft actually used at this location.</li> </ol> <p>In addition, the City may consider requiring additional analysis to address the following questions:</p> <ul style="list-style-type: none"> <li>• Additional review to address potential future adjacent development (i.e., a future configuration which may augment or mitigate predicted impacts in the future)</li> <li>• Testing of mitigation schemes if the project results are unacceptable (i.e., the wind tunnel study could be then used to help define a height, size and location on that site that could be acceptable).</li> </ul>
4	<p><b>Quantify Vertical Safety Buffer.</b> Please see the response to Comment 3 in this letter, above.</p>
5	<p><b>Wind Analysis Mitigation.</b> The comment is noted. As indicated in the response to Comment 3 in this letter (above), the proposed mitigation would require a project-level wind analysis to ensure that safety parameters for aircraft are met. The City is working with WSDOT aviation to establish these parameters.</p>
6	<p><b>Restrict Building Heights.</b> Please see the response to Comments 3 and 5 in this letter, above.</p>
7	<p><b>Noise.</b> Draft EIS Section 3.6 cites the Seattle Municipal Code 25.08.530, which exempts aircraft in flight from maximum permissible sound levels. As described in the noise analysis, increased building heights near the flight path could result in increased noise impacts to residences and/or offices in upper portions of new buildings from aircraft overflights. However, while sounds from seaplane operations may on occasion be a nuisance to some, such sound levels are exempt from Seattle’s Noise Code.</p>
8	<p><b>Safety of Flight Operations.</b> The comment is noted.</p>

Comment Number	Response
<b>Letter 44: Brumbaugh, Mark</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
<b>Letter 45: Buck, Peter L.</b>	
1	<b>Significance of South Lake Union.</b> The comment is noted. This EIS evaluates probable impacts associated with each of the alternatives as they relate to the entire South Lake Union Neighborhood.
2	<b>Support Alternative 1.</b> The comment is noted.
3	<b>Panhandle Unique Characteristics.</b> The comment is noted.
4	<b>Dexter Avenue Designated Scenic Route.</b> The comment is noted. Draft EIS indicates that Dexter Avenue North is a designated scenic route within the study area. Portions of both Dexter Avenue North and Aurora Avenue North provide easterly territorial views toward Lake Union, Capitol Hill and the Cascade Mountains beyond, as well as southerly views of the downtown skyline. Because of development that has already occurred along the east-side of Dexter Avenue North, however, easterly views toward Lake Union are limited to east-west street corridors. Existing zoning along Dexter Avenue North is SM-65, which allows mixed-use commercial development with provisions under certain circumstances for 85-foot high structures.
5	<b>Transition Between Districts.</b> Such is always an important consideration when considering area-wide rezones. However, transition may be less important with Queen Anne neighborhoods due to the separation that currently exists as a result of Aurora Avenue North. Zoning height measurement presently accounts for topographic variation across a site. Please see the discussion of impacts and mitigation in Section 3.10.2 and 3.10.3.
6	<b>Street Grid and Tower Bulk.</b> The comment is noted. As indicated, the Draft EIS acknowledges that tower bulk may be a consideration in areas containing double blocks, however, it is also noted that development may occur without a podium. As indicated above, existing zoning in this portion of the study area is SM-65, which allows mixed-use commercial development with provisions under certain circumstances for 85-foot high structures.
7	<b>Residential Development Encouraged.</b> The comment is acknowledged.
8	<b>Limitation on Podium Heights.</b> The comment is acknowledged. As indicated previously in the Draft EIS, however, development may occur without a podium.

Comment Number	Response
9	<b>Reduce Maximum Floor Plate Size.</b> The comment is noted.
10	<b>Increased Residential Density.</b> Increased residential development within South Lake Union is a key consideration of this Height and Density Alternatives EIS. The comment is acknowledged.
11	<b>Additional Subarea Land Use Policy Analysis.</b> The supplemental information is noted.
12	<b>Westlake Steps.</b> Further consideration will be given to podium heights and commercial floor plate size within this subarea as they relate to public amenity potential.
13	<b>Panhandle Considerations.</b> The comments concerning podium heights, tower spacing, façade setbacks, floor plate size and bulk limitations are noted relative to this subarea of the South Lake Union Neighborhood.
<b>Letter 46: Buford, Thomas</b>	
1	<b>Support Increased Height and Density.</b> The comment is noted.
<b>Letter 47: Burch, William and Gloria</b>	
1	<p><b>Don't Increase Growth Targets.</b> The 2031 numbers discussed in Draft EIS Section 2.2 are not targets, but are estimates intended to provide additional context for understanding potential long-term growth in South Lake Union. As noted in the discussion in this section, the estimate is for analysis purposes only and does not represent policy intent by the City. In order to disclose the potential range of capacity needed to meet a future growth target for South Lake Union, both 2024 and 2031 are considered in the analysis.</p> <p>In Draft EIS Section 3.8, additional discussion of the Seattle Comprehensive Plan Urban Village Element states that formal City action to establish a growth will occur in the future based on an analysis of the capacity of all of the urban centers and other areas of the City. Consistent with the Washington Growth Management Act, the South Lake Union 2031 growth target that is ultimately proposed and adopted by the City will reflect an understanding of overall development capacity.</p>
2	<b>Consider Views of Lake Union.</b> The comment is noted. Please refer to the analysis of views in Final EIS Section 3.4.
3	<b>Unacceptable Traffic.</b> The comment is noted. Please refer to the transportation analysis in Draft EIS Section 3.13.
4	<b>Maintain Current Zoning in Cascade Neighborhood.</b> The comment is noted. Existing zoning standards in the Cascade neighborhood would be retained in

Comment Number	Response
all EIS alternatives except Alternative 1.	
<b>Letter 48: Butler, Henry and Olga</b>	
1	<b>Compromise Between Existing Conditions and Alternative 3.</b> The comment is noted. As described in Final EIS Chapter 2, the proposal considered in the EIS is the potential use of incentive zoning as a strategy to achieve neighborhood plan goals and other public benefits. Incentive zoning would allow increased height and density if public benefits defined in City code are provided. The proposal does not include a rezone of existing Seattle Mixed zoning designations.
<b>Letter 49: Calder, Allegra</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
<b>Letter 50: Carlin, Gregory</b>	
1	<b>Aircraft Approach Departure Paths.</b> The comments are noted. Please see Final EIS Chapter 2 and Section 3.2 for information regarding the revised flight path.
2	<b>Seaplane Noise.</b> The comment is correct in suggesting that changes in seaplane takeoff flight paths and altitudes will change the noise from these sources, but incorrect in estimates of the amount of change. Noise levels from an individual plane in flight will change with increasing or decreasing distance at a rate somewhere between the rates of change from normal "line" (e.g., a road) and a "point" (e.g., a slamming door) sources of noise. So at a rate somewhere between 3 and 6 dBA for each doubling or halving of distance. So a change in elevation by 1/2 would result in about a 4.5 dBA increase in sound level, and a change to 1/3 in elevation would increase the sound level about 8 dBA. Either change would likely be noticeable to a person with normal hearing, but neither change would represent a doubling of loudness which requires a change of 10 dBA.
3	<b>Oppose Higher Buildings.</b> The comment is noted.
<b>Letter 51: Cesternino, Robert C.</b>	
1	<b>Support Additional Height and Density.</b> The comments are noted. As described in Chapter 2, the proposal considered in the EIS is the potential use of incentive zoning as a strategy to achieve neighborhood plan goals and other public benefits. Incentive zoning would allow increased height and density if public benefits defined in City code are provided.
2	<b>Benefits of Growth.</b> The comments are noted.

Comment Number	Response
3	<b>Visit the Neighborhood.</b> The comment is noted.
<b>Letter 52: Chadsey, Marjorie</b>	
1	<b>Oppose Increased Height.</b> The comment is noted.
<b>Letter 53: Chandler, John</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
<b>Letter 54:Clancy, Karson</b>	
1	<b>Support Alternative 1.</b> The comment is noted.

## Comment Letters 55-89

55.	Collins, Arlan and Woerman, Mark L.
56.	Coney, Donald John
57.	Corr, Saroj
58.	Coulter, Jefferson
59.	Cree, Russ
60.	Crossley, Katharine
61.	Curran, Lori Mason
62.	Curtis, Jared
63.	Dasler, Joshua
64.	Douglas, Lloyd
65.	Doxsee, Marcella
66.	Ehlebracht, Mike
67.	Estes, Brian
68.	Estes, Jill
69.	Evans, David R
70.	Felber, Jim
71.	Foster, Dan
72.	Ferretti, Peter
73.	Fiedorczyk, Bryan
74.	Freeman, Judith
75.	Frothingham, Donald
76.	Fulford, Lee
77.	Gaillard, Arnie and Pat
78.	Garner, Jackie
79.	Giacobazzi, Joseph, Paul Fuesel, Nelson Davis
80.	Golde, Marcy J.
81.	Gooding, Kim
82.	Grant, Gabe
83.	Gregory, Serge
84.	Gunn, Cecelia
85.	Hafenbrack, Charles
86.	Hailey, Julia
87.	Hastings, Ryan
88.	Hazlehurst, Hamilton
89.	Healey, Ada M

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March 30, 2011

Seattle Department of Planning and Development  
Attn: James Holmes  
700 Fifth Ave., Suite 1900  
P.O. Box 34019  
Seattle, WA 98124-4019

**Re: In support of the South Lake Union Height & Density Draft EIS**

Dear Mr. Holmes:

We are writing to declare our strong support of the South Lake Union Height & Density Draft EIS. As local business owners who also live within a mile of South Lake Union, we believe that there is much to be gained and little lost from allowing taller buildings in the neighborhood. Our reasons follow:

**It's good business.** South Lake Union is a burgeoning hub for the science, technology and commerce industries, which typically choose to locate in urban areas because they foster collaboration. Many of the city's largest, most high-profile employers are making their headquarters in South Lake Union for this very reason – to keep their employees together. We firmly believe that Seattle needs to do everything we can to attract and retain the nation's best companies. One way to do that is to create attractive, safe urban neighborhoods where people can live and work, and companies have room to expand over time. As a result, our economy will be given a much-needed boost.

Taller buildings in South Lake Union will house more businesses, more employees and create more living wage jobs which will lead—and sustain—our economic growth. This platform for prosperity will also drive up revenue for the city through increased fees and income from sales, utility, B&O and real estate taxes.

**It's good planning.** As urban design and planning professionals, we have spent decades studying what works best for growing cities and developing neighborhoods. We believe, without question, that Seattle needs a centralized location within the downtown core that can be the catalyst for

future growth – and we believe there is no better place for that than South Lake Union. Encouraging a vibrant, close-in community with taller buildings expands housing options, reduces the reliance on cars, and provides a much-needed reconnection with the surrounding neighborhoods. South Lake Union already has the infrastructure in place to make this not only a viable option, but the intelligent choice as well. Allowing taller buildings will require developers to offset new buildings with public benefits like parks and open space, affordable housing, child care facilities and recreation, entertainment and educational opportunities.

Tall, thin buildings have a number of advantages over their shorter, more compact counterparts: they preserve light and air, create more open space at street level and expand view corridors. In addition, more density in the SLU neighborhood will take some of the pressure off of the historic Cascade neighborhood.

**It's good for the community.** Warehouses, parking lots and outdated low-rise buildings are not amenities. Taller, denser housing and commercial buildings will bring more people to the area and in turn, attract restaurants, shopping, and services, necessary for a thriving urban community. Increasing the neighborhood population by increasing the development density will bring more amenities – typically the local, independent retailers that flock to new urban centers—that residents can access by bike or on foot, thus decreasing their need to drive. Ultimately, it's the people that make a neighborhood vibrant and exciting, and it's the people who shape the community. Increasing the allowable height will provide for more opportunities – family housing, affordable housing, businesses, and retail goods and services—all of which support the quality of life in our city and provide good jobs.

**It's environmentally responsible.** Seattle is often touted as one of America's greenest cities. Yet our current zoning limits our ability to build anything in this area other than short, stocky buildings. These limitations are neither in step with current urban design thinking nor are they environmentally responsible. Taller, denser multi-family housing buildings put less strain on the environment and are more energy efficient in terms of access to natural light and heating and cooling requirements. Not only are they good in terms of resource conservation, but they also result in lower occupancy costs for the residents and lower expansion costs for our utility providers. More importantly, increasing density so close to our city center means that more people will walk, bike, or take public transportation to work, reducing traffic congestion and vehicle emissions.

**Adopt Alternative 1.** Seattle will grow. If we don't look to our future and harness the potential to absorb this growth in the right strategic area - with existing infrastructure- then where will that growth go? We see few options and none are better than those in South Lake Union. We believe that adopting these changes just makes sense – from a business, community and sustainability standpoint – and that Alternative 1 benefits the most people and maximizes our city resources in a way that the other options do not.

1 cont

We strongly support the South Lake Union Height & Density Draft EIS and ask that you do the same.

Sincerely,



Arlan Collins  
Co-Founder and Principal  
CollinsWoerman



Mark L. Woerman  
Co-Founder and Principal  
CollinsWoerman

April 8, 2011

Seattle Department of Planning and Development

Attn: James Holmes

700 Fifth Ave., Suite 1900

P.O. Box 34019

Seattle, WA 98124-4019

southlakeunioneis@seattle.gov

RE: South Lake Union Height and Density Draft Environmental Impact Statement (DEIS)

Dear Mr. Holmes;

North Portal street realignments will transform the physical connections between the Uptown Urban Center and South Lake Union Urban. New access routes and transportation services linking the two urban centers and the other Seattle urban centers and hubs become possible.

There have been a number of shared, urban center planning efforts over the past decade: The on-going Mercer Corridor Stakeholder Committee, QA/SLU Visioning Charette, and most recently the QA/SLU Mobility Plan. Both urban centers are active in the WSDOT North Portal Advisory Group.

I am concerned that the DEIS did not look at economic development. The Downtown Seattle Association has demonstrated the tax benefits of mixed-use development in urban areas. Please analyze the economic development impacts of the alternatives.

In 2006, over 35 community stakeholders from QA and SLU were involved in developing a Joint Vision for Uptown and South Lake Union Urban Centers. A priority recommendation of this planning effort stated the need to "Develop Density around Public Investments." The participants recommended to :

- Locate taller buildings close to all transit corridors, particularly streetcar routes
- Encourage residential density around parks (Lake Union Park, Denny Park, Cascade Playground and Seattle Center).
- Locate mixed use high-rise tower development around regional transportation corridors (Aurora, Mercer, Westlake, Fairview and Denny).

The current Seattle Comprehensive Plan envisions locating 50% of new population growth in the six Seattle urban centers. South Lake Union and Uptown represent a major portion of that projected population growth. How can this be done in a way that adds residential development and infrastructure that is sustainable, functional, attractive, livable, and generates new tax base?

3

I believe that Alternative #1, the most dense proposal, will provide an attractive neighborhood for a broad range of residents considering a move from suburbs and exurbs to a center city that can offer the urban necessities for employment, transportation, recreation, education, health care, and public open space.

4

EIS documents focus on negative impacts of development and mitigations for impacts. We ask that the EIS study benefits per capita flowing from a densely developed urban center in the impact areas of *Air Quality, Environmental Health, Noise, Land Use, Housing, Aesthetics, Cultural Resources, Transportation, and Open Space & Recreation.*

5

For once, we see some infrastructure improvements leading the projected population growth in the instance of South Lake Union. We believe that the Seattle Streetcar, RapidRide BRT planning, the Mercer East and Mercer West Projects implementing the two-way Mercer/Roy Corridor, the North Portal street and right of way realignments, Lake to Bay Trail implementation and planning, Lake Union Park, Seattle Center, new access to the Elliott Bay waterfront, the arts-oriented Center High School, and other infrastructure plans offer a basis for a dense, livable, employment-centered neighborhood based on Alternative #1.

6

These on-going infrastructure improvements will provide major opportunities for enhanced pedestrian, bike, and transit improvements for both South Lake Union and The Uptown Urban Center.

Thank you for considering all the above factors that lead us to predict that South Lake Union will become a model, liveable, dense, mixed use neighborhood based on zoning such as is shown in Alternative #1.

Sincerely,

Donald John Coney

3227-13<sup>th</sup> Ave. W., Seattle, WA 98119

206/283-2049

djohnconey@aol.com

**Comment for South Lake Union Height & Density Draft Environmental Impact Statement, April 11, 2011**

Submitted by: Saroj Corr/Senior Transaction Manager/CBRE Asset Services

I am a Senior Transaction Manager for CBRE Asset Services leasing over 50K sq/ft of properties in South Lake Union. I have listings for properties that are ready for development, existing flex warehouse properties as well as retail and some office. I also lease other properties in Seattle, Eastside and the Peninsula. I represent tenants in Seattle and greater Seattle area and have over 10 years of experience in leasing Commercial Real Estate in Seattle.

As a real estate professional, I appreciate neighborhoods that provide the opportunity to build mixed use developments which create eco friendly options and increase job growth and urban density. With larger companies wanting to consolidate in one area, coming out of traditional campus settings and re-locating to Seattle in areas like South Lake Union, more jobs are created and opportunities for retail and restaurants to expand into the neighborhood. The urban density increases supply and demand and existing mom and pop establishments can remain in business and creates a need for new retailers to move into the neighborhood. The large employee growth, commute and parking needs drive the need for demand for housing in the area. I have several peers working for companies in the area who have recently relocated from suburban neighborhoods and purchased or leased condos in South Lake Union.

In order to create an urban center that will support the urban density in South Lake Union, there is a need for more mixed use buildings exceeding the current zoning restrictions. It is imperative to have buildings with height to be able to support the high space demand from large companies similar to Amazon, Group Health, SBRI, Microsoft, Path and other organizations in the technology and bio/medical science to consolidate their operations in one area in the City. Building tall buildings as opposed to bulky buildings will also allow the best use of existing infrastructure such as roads, public transit, parks and other. It also requires developers to create public benefits such as affordable housing, day care/childcare and pocket parks, all positive attributes for a diverse urban center.

South Lake Union in the last five years has created massive job growth, increased retail and restaurant use, steadily converted to a safe neighborhood with housing and is well on its way to being a thriving urban center. The SLU Height and Density EIS will provide opportunity for urban growth and potential expansion of a fully operational urban area consisting of schools, hospitals and multi family housing to come to flourish.

I support the additional height and density in South Lake Union and am hoping my comment would be taken into consideration towards any decision made in this regard.

Thank you.

Saroj Corr  
Senior Transaction Manager/CBRE Asset Services  
401 8<sup>th</sup> Avenue North,  
Seattle, WA 98109  
D: (206) 262 8828  
F: (206) 262 8805

Holmes, Jim

From: Jefferson Coulter [mailto:jeffcoulter@ymail.com]
Sent: Sunday, March 27, 2011 8:51 PM
To: Holmes, Jim
Subject: South Lake Union DEIS Comment

Dear Mr. Holmes:

I wanted to comment on the proposed Density and Height increases in SLU. I live in Capitol Hill, in the Harvard Belmont neighborhood. On the west slope, we have a spectacular view of all the changes in South Lake Union. The height increases don't necessarily bother me if they are tied to specific neighborhood amenities, mitigation work and improvements. Both developers and residents should benefit.

1

Any height increases must be coupled with adequate infrastructure to support the increased density.

2

- Funding to increase frequency for the Streetcar (north/south) and Metro Route 8 (east/west).
Converting the 8 into an electric trolleybus (reducing noise and pollution).
Providing signal priority for transit on both corridors.
Funding to build out the streetcar network.
Funding for a Sounder Station at Broad Street.
Adequate parking, sidewalk, and bike lane requirements.

Mid-rise development that includes varied street-level assets (such as restaurants, shops, schools, daycare, and health-care providers) is preferable to office park type development that leaves the neighborhood deserted at night, with a big box appearance during the day.

3

Neighborhood Connections should be a priority. Including improved connections between Capitol Hill, Queen Anne, Eastlake and Westlake.

4

Thank you for your consideration.

Jefferson Coulter
505 7th Avenue East

Holmes, Jim

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**From:** Russ Cree [russcree@glacier.com]  
**Sent:** Friday, March 25, 2011 10:22 PM  
**To:** DPD\_Planning\_Division  
**Cc:** Russ Cree  
**Subject:** South Lake Union Height & Density Draft Environmental Impact Statement

To: James Holmes, Seattle Department of Planning and Development  
From: Russ Cree, Glacier Real Estate Finance  
Re: South Lake Union Height & Density Draft Environmental Impact Statement  
Date: March 25, 2011

As a 30+ year Seattle area resident and real estate professional I want to thank you for the opportunity to list what I believe are several obvious reasons for supporting and encouraging increased density in the SLU neighborhood so that the transformation that is now under way can be continued and enhanced in a way that benefits not just the city of Seattle but our entire region. 1

1. The existing infrastructure (transit, roads, parks, etc.) makes SLU the logical neighborhood for taller and denser development
2. Denser housing and workplace development mixed with retail services encourages shopping, walking and biking - an environment that supports healthy lifestyles.
3. Taller multifamily buildings increase total housing stock in the city.
4. Taller buildings with accompanying setbacks create interesting view corridors and more open space for landscaping, public parks, etc.
5. More people living, working and visiting in an area means more activity and life on the street. More foot traffic. More people who can shop support and create additional retail services.
6. Dense development will concentrate jobs and housing along transit corridors in order to maximize transit use.
7. Building taller creates public benefits like affordable housing, pocket parks, childcare centers, etc.
8. Living densely means that the city can serve more citizens at lower cost to taxpayers
9. More development means an increased tax base

In summary, remember the SLU of 10-15 years ago....dead, dead, dead....look at it now and imagine how much better it can be. Think Vancouver, BC.

Thank you.....let's get going!

Russ Cree  
Principal  
Glacier Real Estate Finance  
206-890-8911  
[russcree@glacier.com](mailto:russcree@glacier.com)

- o
- o **More amenities.** More people support the smaller, locally-owned, independent retailers and uses with character.
- o **Safety.** More people on the street mean **more eyes on the street.** No more walking through dark empty parking lots or along abandoned warehouses.
- o I want to be able to live and work close to downtown and not have a significant commute. We need **more housing downtown.** Restricting heights is **counterproductive.**
- o

**Do it Right! Better planning now leads to a better future for ALL in our region.**

- o **If not in South Lake Union, then where else can we place future growth in Seattle?** Better planning is encouraging well-designed & constructed towers right outside of downtown, rather than more 6-pack townhouses and squat bulky apartment buildings **encroaching on our residential neighborhoods.**
- o South Lake Union is central, blocks from downtown, and easy to get to from other neighborhoods. It's where we should plan for more growth.
- o
- o This means **more housing options.** More overall housing stock = **more affordable housing.**
- o

**Seattle needs to walk the talk on environmental sustainability and curb urban sprawl.**

- o Building tall in South Lake Union **reduces sprawl.** Reducing sprawl puts fewer cars on the road. It creates better access to all the city has to offer.
- o Reduce emissions and make our cities more livable by building **walkable neighborhoods** instead of auto-dependent neighborhoods.
- o Dense, compact, walkable neighborhoods is the most cost effective way to **combat climate change**

**Thank you for your interest in submitting a comment on the *Please write comments in your own words and send from your personal email account.***

**Don't take our city's economic development (and taxes) for granted.**

- o Increased height and density in South Lake Union creates more ongoing revenue for the city through real estate tax, sales tax, utility tax etc.
- o It maximizes the investment the city has already made in the South Lake Union area. It is the most efficient use of tax dollars.
- o Large companies can better consolidate their employees. This means more people working out of one location and leads to greater efficiency.
- o Building densely in South Lake Union will lead to more construction projects, which means more family-wage jobs.
- o Building tall buildings allows more concrete and steel construction. Concrete and steel construction means more union labor. And buildings are usually sturdier, higher quality and longer-lasting.
- o

**Call the city to action.**

- o The city should seriously consider where the growth would go if not in SLU? There will surely be impacts to other Seattle neighborhoods if South Lake Union does not absorb that future growth.
- o The city should adopt Alternative 1, the most aggressive and progressive alternative because it benefits the most people and maximize our city resources. It's the right thing to do.
- o Please do the right thing for the long term future of our city and region. Do not hamstring the growth potential for South Lake Union as it will negatively impact the overall quality of life in Seattle.
- o Do right by our planet and support the greatest growth in the part of town where it makes the most sense.
- o Why only plan until 2031? 20 years is not nearly enough for long range responsible planning. Growth will continue to happen, we should plan appropriately for it now, rather than pay the dear cost of continued urban sprawl tomorrow. I urge our elected officials to consider the greatest good in the long term rather than the next election.
- o Please keep an open mind about taller buildings in the South Lake Union urban center.
- o Factor in existing buildings in the EIS future build-out scenarios. Many recently built structures today will not be redeveloped into towers in the next 50-70 years. Take those out and the impacts will be much different.

Written comments must be submitted before Monday, April 11 via email or post:

E-mail:

Post: Seattle Department of Planning and Development

Attn:

700 Fifth Ave., Suite 1900

P.O. Box 34019

Seattle, WA 98124-4019

**Thank you again for your help**

**Russ Cree**

Principal

Glacier Real Estate Finance

2800 156th Ave. SE, Suite 210

Bellevue, WA 98007

425-274-0281 (direct)

206-890-8911 (cell)

Holmes, Jim

From: Katharine Crossley  
Sent: Thursday, March 31, 2011 1:27 PM  
To: DPD\_Planning\_Division  
Subject: Rezone of slu

Raising appraisals and assessments by increasing possible sq. footage in heights would seem to mitigate financial problems of both developers and city coffers, terrible at this point ,BUT IS A FLAWED FIX which will seriously degrade our city. Developers can move on, breathing free from the burden of debt a zone hike allowed them, but the havoc those changes allows remains the legacy for our citizenry.

EIS proposal outcomes:

Inability to build the 6 floor wood/concrete working family price range affordability in SLU

Loss of the priceless advertising draw our iconic views of space needle, mountains, water for our whole region

Extreme Congestion in area of severely lacking mass transit potential and already congested

No accommodation for child schooling planned or provided for families

Reduction of daylight, increase of wind strength, diminished human scale

Loss of views by towers, contrary to Lake WA zoning enforced rules, by Lake Union will not be mitigated by a payment of Discovery Center property adjacent to Denny Park which may be being reserved as a bargaining chip. Lake view protection should be inviolate otherwise it is a betrayal of the heritage we have had passed to us.

Gifted Kerry Park bears my Grandfather's words "That they may enjoy the view". His grand, great, and great-great grandchildren, my family, as many citizens locally and from around the world, continue to enjoy his legacy. I feel passionately we owe to those that follow to leave a legacy as best we can in stewardship to our beloved city that has been demonstrated at it's best by our predecessors . K. Kerry Crossley

These are but some of the negatives which collectively will achieve lower value not increased value for the city beyond the near term.

No step  
Sent from my iPad

**Holmes, Jim**

**From:** Lori Mason Curran |  
**Sent:** Monday, April 11, 2011 1:49 PM  
**To:** DPD\_Planning\_Division  
**Subject:** Comment regarding South Lake Union Height and density EIS

Dear Mr. Holmes:

After reviewing the draft South Lake Union Height and Density EIS, I was struck by what an amazing and unprecedented opportunity our city has to shape the way Seattle grows and develops in the coming decades. I also confess that it makes me nervous because the re-zone of South Lake Union will impact generations to come and I fear we might not get it right. I am in favor of a re-zone alternative that will bring the most benefits to the City and the Region through additional tax revenue and public benefits. I am in favor of dense development in the center city because it helps maintain the character of single family neighborhoods by directing growth where there is already infrastructure in place to support it. And I am in favor of flexible zoning that allows developers to choose how high they want to go and requires fair and commensurate payments in order to do so. I know there are some who oppose any additional height or density in South Lake Union. However we must remember, this is a critical economic decision that should not be weighed down by emotional arguments. | 1

I am a resident of the Maple Leaf neighborhood where between 2006-2010 residents successfully protested the proposed development of 39 townhomes on a 1.6 acre site known as Waldo Woods, an urban grove of mature, native Douglas firs. That process is a perfect example of why we need to direct growth in places like South Lake Union. The development of Waldo Woods would have destroyed dozens of mature trees, all for a low density development of 24 units per acre. Our land is too precious for that.

Waldo Woods illustrates why our city needs to promote dense growth and development in infrastructure rich areas like South Lake Union. Our city is growing rapidly and if businesses and residents aren't encouraged to populate dense urban centers, we will witness a devastating impact on our close-in single family neighborhoods and our coveted green spaces located further afield.

Current zoning in South Lake Union does not promote the kind of development that makes for a healthy community over the long run so I am pleased that a re-zone is being considered. While some developers build more responsibly than others, there are examples in the neighborhood that illustrate why we need to not only allow but encourage more height - and lots of it; because more height and density will translate to more benefits for the City and the community as a whole. I cannot fault the developers or architects of buildings like the Mirabella for following zoning guidelines, but the no action Alternative 4 will result in more buildings like that: lot line-to-lot line development with NO public spaces, NO public amenities, NO contributions to much needed affordable housing. It is ironic to hear residents of Mirabella opposing additional height and density in South Lake Union when they live in one of the most egregious examples of why we need new zoning. To allow this kind of continued development without the option to build something taller, more graceful and more environmentally responsible would be criminal. | 2

We cannot afford to short change ourselves by imposing height limitations that will dilute many important economic benefits. Allowing significant additional height such as that outlined in Alternative 1 will result in the greatest benefits for the city – significantly more tax dollars to support much needed services, significantly more contributions to affordable housing and environmentally friendly development that will include an abundance of pedestrian friendly open spaces throughout the neighborhood among other improvements. By encouraging the most density in places like South Lake Union, our single family neighborhoods will be spared from the kind of senseless development that was planned for Waldo Woods. And, economically, it is the right thing to do. Almost daily in the local newspaper I see articles addressing budget shortfalls, cuts in schools, the police force, libraries and other important social services. Let’s help narrow those gaps. Allowing the greatest height and density in South Lake Union can help by increasing tax revenue to fund critical services.

3

Let’s make Seattle even more special than it is today. Let’s add to its iconic skyline - let’s allow tall buildings at the Lakefront – truly graceful tall towers that complement the rest of Seattle’s skyline – the Space Needle, the new Courthouse, the Columbia Tower. Many world cities have successfully integrated tall towers along their waterfronts and I firmly believe that with proper planning and the accurate understanding of the resulting benefits, Seattle will enthusiastically follow in these footsteps.

The format of the draft EIS is such that many will be misled into believing that the images depict a realistic view of what could be developed over the next 20 years. I think the community and decision makers would be much more likely to make the right decision if they understand the likely pace of development as well as the quantifiable benefits that will result from the most density. Not all developers will want to build to the maximum height – but allowing them to choose will result in the best development profile for the neighborhood. Please do not limit developers in height. It will be up to them to decide whether or not to go higher. Let the design review process ensure that the development meets the needs of the community and the higher they go, the more benefits there will be for all to enjoy.

4

In closing, I hope the final EIS will quantify the many benefits that will arise from providing zoning that will allow the highest heights proposed and I hope it will provide a realistic visual representation of what Alternative 1 might look like 20 years in the future.

5

There won’t be any Mulligans here so let’s drive for a hole-in-one!

Sincerely,

Lori Mason Curran

King, Donna

From: Jared Curtis [jared.curtis325@gmail.com]  
Sent: Sunday, April 10, 2011 8:12 PM  
To: DPD\_Planning\_Division  
Subject: SLU Draft Environmental Impact Statement (EIS)

Seattle Department of Planning and Development  
Attn: Jim Holmes

I learned from Councilman Richard Conlin's recent newsletter that Seattle has adopted a goal of restoring and increasing our urban forest. He reported that "We have created an Urban Forestry Commission (UFC) that is reviewing current policies and developing new approaches that I hope will emphasize native vegetation, habitat restoration, and the benefits of trees in natural drainage." How realistic could this hope be if the City approves high density zoning in such areas as South Lake Union? Though not mentioned in the UFC's plans for their review, one great benefit that will accrue from restoring and increasing the urban forest will be to "restore and increase" the livability of neighborhoods. | 1

At risk under Alternatives #1 and #2 in the SLU Draft Environmental Impact Statement is the current level of livability in this large and diverse neighborhood. Of the plans remaining on the table, only Alternative #3 and the current zoning have any hope of at least sustaining that level and of affording opportunities for raising it for the benefit of the citizens who live and/or work in South Lake Union. Cascade neighborhood in particular already has a distinct neighborhood character that could not survive solid commercial and high-rise development, which would bring dramatic increases in traffic and noise, reduction or elimination of lake and city views for most residents, and a sharp reduction of the proportion of green-space acres (not presently very high) to numbers of inhabitants. | 2

Finally, the nearest public school is Lowell School on Mercer and 10th (Capitol Hill). Without any planning to include schools, more parks, adequate public transit, and diverse housing opportunities, how indeed will the area ever sustain its livability? | 3

Sincerely yours,  
Jared Curtis

Jared Curtis  
Graphic Designer and Editor,  
*The Mirabella Monthly*  
116 Fairview Avenue N  
Unit 347  
Seattle, WA 98109  
206-254-1603 home  
206-387-0530 cell

**Holmes, Jim**

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**From:** Dasler, Josh @ Seattle [Josh.Dasler@cbre.com]  
**Sent:** Monday, April 11, 2011 5:18 PM  
**To:** DPD\_Planning\_Division  
**Subject:** South Lake Union EIS Comment Period

Hello,

As an employee in the South Lake Union area for the past 6 years, I have seen the dramatic improvements that have occurred and are occurring. However, after visiting some of the true urban centers in Portland's Pearl District and Vancouver BC, I am convinced there is much more that can be done to truly meet the needs of tomorrow both environmentally and economically.

I support Alternative 1 in the Draft EIS for a few specific reasons that I don't believe are truly emphasized or addressed enough in the Draft.

- The economic benefit to all layers of business is huge by increasing heights. Increased population and foot traffic in the area allows smaller businesses to flourish. Taller buildings allows more companies to move into the area and provide economic growth.
- Through this increase in density and downtown living options, we can greatly reduce the need for single occupancy vehicles and by concentrating people into a small area it allows for easier planning of Public Transportation in the future. We can truly focus our resources and transit options to help the most amount of people. With the tight budgets we are hearing about at Metro, our ability to consolidate people and make transit available to a greater number of individuals with minimal cost should be seen as a huge opportunity that we can't pass up.
- Seattle will grow. If Alternative 1 is not chosen, where will the growth go? There are negative impacts that could occur if growth happens in areas that are not designed accommodate this.

We have such a unique opportunity to truly be a leader and pioneer in urban development. We must look at the unintended consequences if we aren't aggressive and bold in our focused growth.

Joshua Dasler, LEED AP BD+C | Real Estate Manager  
CB Richard Ellis | Asset Services  
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Lloyd Douglas

1167 Republican St., #311

Seattle WA 98109

James Holmes

Senior Planner

City of Seattle Department of Planning and Development

700 Fifth Avenue, Suite 2000

Seattle WA 98124

April 11, 2011

Enclosed are my comments to the Draft Environmental Impact Statement, February 23, 2011.

**Section 3.2 Air Quality**

No mention of Denny Way traffic impacts to air quality in the neighborhood

1

**Section 3.4 Plants and Animals**

Even with the inadequate one day shadow studies there are large impacts to the newly restored natural habitat areas in Lake Union Park. Located in the southwest portion of the Lake, the natural shoreline is intended to aid in the restoration of fish and fowl populations in the Lake and to those transiting the area.

2

The one day figures do not measure the length and duration of the shadows over the lake and shoreline so there is no way to see if there is any degradation or mitigation(s) needed.

Further study is needed, especially in the Dexter and Fairview areas, of the impact of shadows on plant life and its supporting role in restoring water quality for wild life and people.

Page 3.4-7

"During the fall migration ... would experience barrier a few minutes earlier ... Alternatives 1 - 3 are in- fill do not extend downtown west or east...

3

Alternatives 1 and 2 excessive heights may cause the diversion of the bird flight paths into the take off lanes of the FAR 77 area. Since this is a critical time in flight and a bird strike could easily cause the loss of power thus endangering the plane's crew and passengers and if full power is lost people on the ground could lose their life through impact and/or burning of aviation fuel

3 cont

### Section 3.8 Land Use

The step down to the water is established in City code already in the Downtown and Bell Town portions of the city. In fact the step down option works with the new flight path information. The step down approach does not preclude it from use along major (Aurora, Dexter, Denny) corridors. The heights available may or may not satisfy a developer's ambition for a particular parcel or parcels of land. There is enough height options studied to enable a step down to the lake to work.

4

The shadow studies are not useful in any impacts on Denny Park, Lake Union Park and Cascade Park. There is also no analysis done on shadow impacts to any open space options that maybe available in the future for policy and planning purposes.

5

Page 3.8-33

"This flight path represents a refinement by WASHDOT... " is insufficient to explain the loss of the South East FAR77 flight path. There is no information available to justify its exclusion for planning efforts.

6

Page 3.8-35

"A secondary route, used occasionally for approaches to Lake Union, is from the southeast over Fairview Avenue." This path is used more than occasionally. It is a fun thing to point out the plane from Cascade Park to the kids and other users of the park. The path is usually over Aurora/Uptown area to Denny Way turning left and another left over Fairview enabling the pilot to gage boat traffic patterns on the lake that will affect his landing.

7

For figures 3.8-5,6,7 the note that is added says the figures show the major wakes effects only and does NOT include turbulence eddies. **Note: I am interpreting the second half of the sentence to mean: residual effects such as turbulence eddies would extend further.** Since there is no analysis as to how much further out in the lake the changes to the wind patterns there is no way to determine mitigations. This analysis does not study the effects of changing wave patterns as they apply to ship repair operations (e.g. Lake Union Dry Dock), the float plane

8

operations in the South East corner of the lake, marinas, and House Boats. This analysis also does not study the impacts on sailing operations in the lake.

8 cont

### Section 3.9 Housing

Housing Affordability – There are no study areas that apply to the cost of land after the extravagant up zones of Alternatives 1 and 2. The workforce, affordable and low income developer communities are having great difficulty under the present zoning to assemble the necessary funding to move forward. This rezone will have a major impact on whether there will be any of this necessary component to building a vibrant and sustainable neighborhood. There is a great likelihood that this will shift this further out in the City or encouraging more suburban sprawl. This will be exacerbated by the lack of frequent transit service to the neighborhood, with no relief in sight.

9

There is also no analysis of affordable housing in other urban centers or neighborhoods. Will this stifle development in other neighborhoods in the city?

10

There should be a study that includes the impacts from the historic resources section and how it may apply to the retention to existing structures and use of TDR's to help provide maintenance and preservation efforts.

11

### Section 3.10 Aesthetics

Page 3.10-3 the first paragraph. The Neptune is NOT located in the Cascade neighborhood.

12

Page 3.10-20 - first bullet, last sentence. Older and Landmarked buildings are usually in a view corridor passing over them. They are also important points for way finding for visitors and new residents of the neighborhood.

13

Transitions – “it may be appropriate to address this potential issue by addressing the zoning of the Uptown Triangle and Southlake Lake Union neighborhoods together rather than independently.” This is a very good idea and should be done in 2014 when the growth target numbers are to be officially adopted by the City Council. Appropriate planning then can occur when residential and commercial numbers are known for the entire City.

14

Page 3.10-83 Cascade Park. The lawn area is also used 2 or 3 evenings and occasionally 1 weekend day for kick ball. During the week there are usually 2 games scheduled each day.

15

The “bread Loaves versus pin towers” has not been useful for discussion. The Vancouver towers used as examples are not available for use here mainly because of code issues. The pin tower conversation has been dubious at best. The claimed minimum in this study is 10,500 sq. ft. This is 2,500 or more sq. ft. larger than the Vancouver residential towers. The impression being left

16

that residential and commercial will be 'skinny' on top of a podium. Thus enabling more view corridors and less street effect.

| 16 cont

Podiums used as parking garages. It really doesn't matter if the building is wrapped in glass, other decorative wall hangings or ground related retail it still is a parking structure that will kill active 24 hour street use. Since there was no economic impact study done there is no way to gauge the impacts of banning above grade parking.

| 17

There is no mention of tower spacing in this document. The hope is that the towers will be built in the corners of the block diagonally across the alley from each other. This does not preclude the towers being built directly across an 18 foot alley from each other. This has already occurred in the city. There should be a 125' MINIMUM spacing REQUIREMENT. This will ensure that an oppressive feeling is avoided in the pedestrian realm. If these are residential towers there will be an increase in curtain sales!

| 18

### **Section 3.13 Transportation**

The study did not identify Republican Street as the main exit from the Highway 99/Deep Bore Tunnel north bound. There are no mitigation strategies on how to route the traffic to Mercer and/or how to slow the speed to neighborhood pedestrian safety levels.

| 19

I also could not find any information that informs this study about the current traffic impacts of Denny Way and how such a drastic increase in height will affect the noise and air quality impacts to the neighborhood. It will also have a major impact to efforts to increase mass transit.

| 20

### **General Comment**

There is no discussion of how the mitigations affect the concurrency requirements. There is no discussion if any of the mitigations will support any of the alternatives. Also, there is no discussion if any or all of the mitigations will prevent any of the alternatives from being implemented.

| 21

**King, Donna**

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**From:** Marcella Morgan [mdoxsee77@hotmail.com]  
**Sent:** Monday, April 11, 2011 2:31 PM  
**To:** DPD\_Planning\_Division  
**Subject:** I Support Alternative 1 for SLU

Hello,

My name is Marcella Doxsee and I am former resident of Seattle who often attends work functions, shops, and plays in South Lake Union. I used to live on the south slope of Queen Anne and have watched the transformation of South Lake Union over the last several years.

I would like to express my support for Alternative 1 in the draft EIS. While I have often read comments about concerns on the height increases this alternative allows, it is unrealistic to expect that the neighborhood will be dominated by these tall structures. I feel there are enough limitations in place with minimum parcel sizes, tower spacing, and the size of the towers allowed to allow for sufficient "breathing room" between these taller structures. More density means more jobs, better retail sales and support for smaller businesses in the neighborhood, and more opportunities for housing.

I have also heard with some amusement comments from others opposed to taller towers because of potential blockage of views. Views are NOT an entitlement, and the urban center should be expected to accommodate more such towers in the future. Density itself can be a great amenity, not only because of the environmental benefits that it generates, but also the pure excitement and the experience of urban living, with goods and services located within a short distance, and increased opportunities to live and work in the same place. When one thinks of the urban cores of New York, Chicago, and Boston, nobody who lives in those cores would think blockage of views from tall buildings is a major objection, but rather an acceptable sacrifice. And for folks living in closer in neighborhoods viewing the urban core, the skyline itself is considered a view premium, just as with mountains, the sound, the Needle, or Mt. Rainier. The denser the skyline, the more spectacular it becomes. So to say a denser population of buildings would result in a degradation of views is counter-intuitive.

I appreciate the chance to comment on this important planning document and hope the City will consider Alternative 1 for the new zoning for South Lake Union.

Thanks  
Marcella Doxsee

Holmes, Jim

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**From:** Mike Ehlebracht  
**Sent:** Tuesday, April 05, 2011 2:46 PM  
**To:** DPD\_Planning\_Division  
**Subject:** South Lake Union Height & Density Draft EIS

To Whom It May Concern:

I have worked in the South Lake Union area for the past 24 years and have seen some exciting changes occur. While I was disappointed that the Commons vision was not realized, I've been pleased with the recent addition of the trolley, Lake Union Park, and the opening of the Amazon campus. I support increasing the population density and building heights in the South Lake Union area to create an even more vibrant neighborhood where I can safely walk to more restaurants, stores, and after-work entertainment options. As a commuter, I also hope that this increased density will support more direct express bus routes to the South Lake Union area. Thanks.

*Mike Ehlebracht*

**Principal Geochemist**  
[mike.ehlebracht@hartcrowser.com](mailto:mike.ehlebracht@hartcrowser.com)  
206-324-9530 business

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**HART CROWSER, Inc.**  
1700 Westlake Avenue North, Suite 200  
Seattle, WA 98109-3856

Holmes, Jim

From: brian estes  
Sent: Monday, April 11, 2011 9:40 PM  
To: Holmes, Jim; DPD\_Planning\_Division  
Subject: Comments on SLU EIS

April 11, 2011

James Holmes  
Senior Urban Planner  
City of Seattle Department of Planning and Development  
700 Fifth Avenue, Suite 2000  
Seattle, WA 98124

[Jim.Holmes@seattle.gov](mailto:Jim.Holmes@seattle.gov)

Subject: DEIS for South Lake Union Height and Density Alternatives

Dear Mr. Holmes

The EIS is factually inaccurate, incomplete and/or misleading in a number of areas. As such, I recommend the problems listed below be corrected and a new DEIS be reissued.

Land Use. The EIS statement on page 1-15 that " the proposed action is generally consistent with adopted City plans, policies, and regulations" is incorrect as the household and job growth projections are substantially higher than targets in current urban center plans. South Lake Union is only 340 acres or 9.2% of the total land area of Seattle's 6 urban centers yet is absorbing a disproportionate share of housing and job growth, especially under alternatives 1 and 2. The final EIS should reconcile this with existing plans and justify the basis for such aggressive growth targets. | 1

Building Heights Near Waterfront. The EIS does not adequately address the fact that land use and building heights under Alternative #1 is inconsistent with land use policies that reflect a step down to the water approach for building heights in Seattle. | 2

Flight Paths. The draft EIS was not distributed to the federal FAA nor does it cite an opinion from the FAA on flight path issues which it should. The EIS is further inadequate since it does not address buffers in detail and lacks a wind analysis which should be completed to adequately assess land use or other impacts. | 3

Transportation, traffic analysis and parking. South Lake Union would be a virtual parking lot during commute hours under almost all the alternatives. Few EIS mitigation strategies would significantly alter that fact. Some number of mitigation strategies "could" be implemented but in fact are not required nor are they measures the City of Seattle has direct control over, such as mass transit. The final EIS should more clearly delineate the inadequacy of most transportation mitigation measures particularly those related to reducing vehicular trips. Also, the EIS does not detail how these mitigation measures would be funded. The travel demand management and parking strategies component of the EIS is particularly inadequate in this respect as both lack definitive analysis, are not adequately supported by data, and use flawed or rely on unspecified assumptions. | 4

Aesthetics. The Aesthetics portion of the EIS, especially Appendix D, is incomplete, wholly inaccurate, and very misleading. None of the graphical representations show the tens of 400 foot towers already permitted in the Denny Triangle or other development in Uptown which will occur in the next 20 years which will alter South Lake Union viewscapes significantly. The final EIS should include representations which clearly depict likely development in adjacent urban centers. Also no views from downtown are included as well. This will require a significant expansion of the view points and simulations stated on page 3.10-40 of the DEIS. These deficiencies in the visual and aesthetic analysis should require a redrafting of the DEIS, and recirculation for comments, prior to proceeding to the preparation of the FEIS. | 5

Shadow Effects. The EIS's conclusion that "shadow impacts are not expected to result in significant adverse environmental impacts" is simply incorrect and patently false. A close examination of figures 29-44 in appendix D shows significant shadow effects on open space, parks, and protected shorelines. The EIS analysis on shadow effects is therefore inadequate and should be redone. | 6

WA Shoreline Management Act. The DEIS is deficient in that it does not address a number of requirements of the state's Shoreline Management Act. The analysis does not address the Shorelines Management Act, RCW ch. 90.58; in particular RCW 90.58.320, which establishes height limits respecting permits. | 7

Sincerely,

Brian Estes

SLU Resident

--  
Brian Estes

Holmes, Jim

From: Jill Estes [jillestes10@yahoo.com]  
Sent: Monday, April 11, 2011 9:17 PM  
To: Holmes, Jim  
Subject: DEIS Comments

Dear Jim Holmes,

I live in the South Lake Union neighborhood and enjoy its vibrant and eclectic atmosphere. We plan to reside here for many years. I support growth in this urban center but recommend it be tempered with thoughtful consideration for preservation of the essence of Seattle as a beautiful water oriented city.

Why do we need to concentrate housing and jobs in the South Lake Union area? The growth projections are questionable and the housing market is sluggish. It could remain so for a long time. There are 6 designated Urban Centers in the Seattle area able to absorb new populations. The growth could be distributed to these other locations, especially considering the traffic congestion. Already Westlake is clogged during rush hour. Have you tried getting to the freeway lately at that time? Amazon workers are not using public transportation. I share a parking structure with them in my condo building, Enso. Trust me-they are driving cars.

1

By building 300-400 foot towers in an area so close to the lake I fear we will lose the sense of beauty we have come here to enjoy. Lake Union is a gem in the midst of Seattle. What was once a working marine shoreline has morphed into a charming place to live and work. A 200' shoreline setback is not adequate to preserve the workings of Lake Union. The shadow affect next to the lake will adversely affect plants, fish, animals and human beings. Light is essential for all of the above to thrive.

2

Please consider a plan that will preserve a Step Down limit on heights from Denny Way to the Lake. And especially keep the height limits below 150 feet in the Mercer and Valley street areas. I hope the City will review the decision to alter height and density standards in South Lake Union and reassess the impacts of these decisions on this area for decades to come. We hope the City will consider itself the keeper of Seattle's legacy for future generations.

3

Sincerely,  
Jill Estes  
820 Blanchard Street  
Seattle, Washington 98121



DAVID R. EVANS, CHME & ASSOCIATES



April 7<sup>th</sup> 2011

James Holmes  
Seattle Department of Planning and Development  
700 5<sup>th</sup> Avenue, Suite 1900  
PO Box 34019  
Seattle WA 98124-4019

Subject: Taller Buildings in South Lake Union

Dear Mr. Holmes

I have been involved with the development and operation of the new Pan Pacific Hotel located at 2200 Westlake, a complex that is a wonderful addition to Seattle and Seattle's skyline "The corner stone of South Lake Union", since 2002".

Certainly, substantial improvement to the blight that was on this site for years and not withstanding the "Path Headquarters" across the street on the site a former car lot.

During this time I have seen South Lake Union (SLU) "rise from the "ashes" old warehouse's and general disrepair as a result of the Paul Allen's' vision and the team of professionals at Vulcan. The result today is new vibrant area with residences and offices; Seattle's "downtown" has expanded "uptown"

The addition of the "Gates Foundation" and "Amazon.com" add to the tax base, bring people to the city, these prestigious organizations may have just as well ended up in Bellevue, if SLU had not materialized.

Simply stated, will the future growth go across Lake Washington to Bellevue where there few restrictions on development and building height? Or will Seattle be the city of the future?

Therefore; the reason for this letter, Mr. Holmes, is to support any initiative that is in place to ensure that South Lake Union continues to grow, and in this case "upward" because, this will benefit the citizens of Seattle and maximize the cities resources

Attracting more global headquarters, large companies can better consolidate employees, adds to the prestige of the city, more people working out of one location and the tax base.

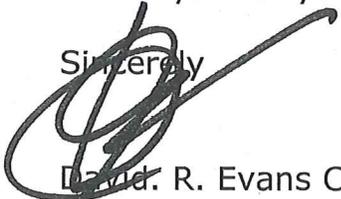
Going forward in order, for Seattle to prosper as vibrant city, the vision of South Lake Union needs continue and raising the current height to build higher buildings does just that. Unlike many other cities, Seattle has very serious director competitor in Bellevue, Washington.

Expanding the good work of the Vulcan that has given Seattle ,a new "downtown," in my judgment, is vitally important to the economy of the city, the people and visitors this great city.

In closing, we need to walk the talk on environmental sustainability and curb urban sprawl. Better planning now leads to better future for all in our region. Increasing the height of future buildings in South Lake Union is better planning

Thank-you for your favorable consideration on this issue.

Sincerely

  
David R. Evans CHME  
Managing Director

I

I have been a resident of South Lake Union for the past three years and would like to comment on the draft EIS after attending the public hearing on March 28, 2011 at Seattle Unity Church.

There were a number of opinions voiced by residents, developers, business owners, construction tradesmen and others. A majority voiced reoccurring themes – density is good, creation of a vibrant diverse neighborhood and opportunity for huge job growth. Several planners spoke of the new jobs that are and will become a reality with the technology industry, medical research institutes, the Fred Hutch and Gates Foundation.

1

I believe I heard that approximate 20,000 plus new jobs are to be created and filled by individuals living in or within walking, biking or trolley distance to SLU. This assumes existing surface streets and the “fix” to the Mercer Mess are adequate to handle the car and delivery truck needs of the neighborhood.

I disagree with the transportation rationale. New employees will have a variety of problems confronting them when hired to the SLU area. Wherever they live at the time of hire, many will be dealing with rental agreements, leases and home ownership that must be dealt with in relocation. The state of the economy will be an enormous determinate of how many of these new employees commute by car or by other means. I would like to see the EIS or the revised EIS devote more creative thinking as to how we will get these new workers to and from work.

2

I think that density is an important part of the SLU development plan. I strongly prefer option 3, but am prepared to live with option 2 with some changes. Seattle has established precedence for a step down elevation requirement towards Lake Union along West & East Lake Avenues. Let us have our high rises starting in the Denny Triangle and sloping towards the lake and not have these towers suddenly springing up two or three hundred feet between the “Mercer Fix” and Lake Union.

3

The vibrant neighborhood concept must also have residents of different ethnic and economic backgrounds as well as different age groupings. There is a history of this type of diversity in SLU and it should be preserved. New residential construction should routinely have some units designated for low income. Furthermore, the neighborhood is definitely getting younger. This trend will continue because of the types of jobs being created. With a younger population base in this area, it is safe to project more babies and school-aged children. We will need a K thru 6<sup>th</sup> grade school in SLU.

4

Maybe the city of Seattle could work a land swap with Vulcan involving the square block where the Discovery Center is presently located. It could be rezoned for a school and would accommodate a multi-story building, staff parking and playfield. If this is not realistic, then the City must create this opportunity elsewhere in the development plan.

5

Thank you for your time and effort and commitment to making SLU truly a model for Seattle and other cities throughout the country.

Jim Felber



April 4, 2011

Mr. Jim Holmes  
City of Seattle  
Department of Planning and Development  
700 Fifth Avenue, Suite 2000  
Seattle, WA 98124-4019

*Seattle*  
601 Union Street  
Suite Number 5151  
Seattle, WA 98101

206.224.3500 tel  
206.224.3501 fax

Dear Mr. Holmes:

As you are already aware, the South Lake Union rezone provides the city of Seattle a great opportunity to accommodate growth in an area that has seen significant infrastructure investments.

From our perspective, our region's growth engines will continue to be computer technology, biotech and global health. My firm represents many of the area's most important technology and life science tenants (please refer to our website [www.flinnferguson.com](http://www.flinnferguson.com)). As such, I am acutely aware of this potential growth and the benefit this may provide the city we all live and work in.

Today's significant technology tenants are attracted to urban neighborhoods like SLU, but require large floors for efficiency and collaboration often looking for floor plates in excess of 30,000 rentable square feet.

Please consider studying alternatives in the final EIS to accommodate towers that meet these programmatic needs. I understand that in some of the superblocks of 100,000SF+, two 35,000 SF floor-plate towers would still leave nearly an acre of public open space onsite. Hopefully this is enough of a balance to accommodate adequate development for high growth companies while serving the public need.

Thank you,



Dan Foster  
*Principal*  
Flinn Ferguson Corporate Real Estate

Holmes, Jim

From: Peter Ferretti [peter.ferretti@panpacific.com]  
Sent: Monday, April 11, 2011 3:18 PM  
To: DPD\_Planning\_Division  
Subject: South Lake Union

Hello,

I am writing you as someone in favor of the proposed changes to the South Lake Union Height and Density Guidelines to allow taller and narrower buildings in the neighborhood.

As the Revenue Manager for a newer hotel in South Lake Union I can attest to the fact that the growth in SLU is adding to the local tax base. Hotel rates and occupancy have been on the rise recently – finally competing with downtown. Further growth will not only stimulate the local economy with construction and service industry jobs, it will add to the occupancy tax base collected.

As a hotelier, with a hotel (Pan Pacific) that has views of Lake Union, I can tell you that short, fat buildings (similar to the ones we currently have) can ruin the view of the lake. From just the 5<sup>th</sup> floor of the hotel you see the tops of buildings – dirt, old HVAC systems, standing water, etc. I would much rather have my guests see between tall, thin buildings than to have to see over short, unattractive ones.

As government leaders with the responsibility of making decisions that will benefit the most people in the long run, Alternative 1 is the right choice for you. Just walk thru SLU to see what proper planning can do! New restaurants by Tom Douglas, tree lined streets, a pedestrian mecca, if you will. This plan will bring small business and big business together and make SLU the model for future city growth in the Pacific NW.

Best Regards,

**Peter Ferretti | Director of Revenue and Business Analysis**  
[panpacific.com/seattle](http://panpacific.com/seattle) | [panpacificseattletour.com](http://panpacificseattletour.com)



**Pan Pacific Hotel Seattle**

2125 Terry Avenue, Seattle, WA 98121

D: (206) 654 8170 | M: (408) 489-0163 | F: 206 654 5049 | [peter.ferretti@panpacific.com](mailto:peter.ferretti@panpacific.com)

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To book or for further information visit [www.gha.com](http://www.gha.com)

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**Holmes, Jim**

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**From:** Bryan Fiedorczyk  
**Sent:** Thursday, March 10, 2011 11:04 PM  
**To:** DPD\_Planning\_Division  
**Subject:** Support for increased height and density in SLU

I am a resident of Seattle and environmental/community planner by trade. Though I currently live in West Seattle, I recently lived in Queen Anne and interacted frequently in South Lake Union (SLU). I have often shopped at the REI flagship, played sports at Cascade Park, frequented local restaurants/bars, traveled the streetcar, and performed community volunteer work within SLU.

In certain areas, such as urban centers like SLU, increased height/density is a necessary tool for the future development and vitality of the area. Increased height/density is also in keeping with nearby Belltown and Downtown, where greater heights are part of the community. SLU also acts as a gateway for much of the region heading to the heart of the city for entertainment or events, and increased height/density would be consistent with that function. I personally would like to see more creatively designed built urban spaces that preserve and create open space and natural vegetation for aesthetic reasons and improved functionality of the community and environment. In my opinion, this can be better accommodated by increased heights, versus low rise lot-line to lot-line developments that contribute to the impervious surfaces of the area, increasing polluted runoff and urban heat island effects. | 1

While it is understandable that some local residents are concerned with the visual landscape and views from their property, it is also important in my view to provide a healthy, vibrant, and economically viable area for the entire community. Additionally, a view of the Space Needle or Lake Union is nice, but much of that viewshed also includes abandoned or under-utilized warehouses and blighted empty concrete expanses. Wouldn't a view of a blended landscape of vegetated open space, public art, and aesthetically pleasing high-rise buildings featuring pedestrian activity with peak-a-boo views of other cultural and natural landmarks be a much more inviting scene?

As a community, I feel we need to consider the greater good of our planning and development, which includes accommodating residential growth in keeping with Growth Management Act requirements, while maintaining as small a built environment footprint as feasible to conserve our surrounding natural resource areas. Increased building heights and density are vital in meeting those community goals, and the SLU area is a logical location for this type of development. I believe planning efforts need to serve the (far too often) "silent majority" of community interest and vision versus the special interests of a small but vocal/active group of neighbors opposed to change.

Thank you for your consideration of my comments. I hope to see a beautiful and vibrant SLU community emerge in the future!

Bryan Fiedorczyk, AICP

I am a South Lake Union resident and am very interested in and excited by all the changes occurring in our neighborhood today. Rarely does a city have such an opportunity as the one presented to Seattle now: to look at a large area of the city and plan its future development appropriately. There is only one opportunity to get it right, and there are too many extant examples of NOT getting it right in Seattle—even on Lake Union.

Below are my comments on the draft EIS. I sincerely hope you will give them great consideration as you draft a final EIS. I also hope you remain open to the possibility of producing a second draft if the scope and significance of comments received warrant this caution approach to rezoning South Lake Union.

1. I support Alternative 3 with modification. I believe Alternative 3 allows for sufficient height and density to match the area's designation as an urban center, while ensuring the maintenance of a livable, walkable neighborhood for all. The modification I suggest is the removing of the "Waterfront" neighborhood (as defined in the EIS, figure 2-2) from the urban center designation altogether. Lake Union's waterfront acreage should not be designated as an urban center. I realize this may not be in the scope of the draft EIS, but actions taken relative to the "Waterfront" neighborhood can effectively remove it from such a designation. Within this "Waterfront" neighborhood, the blocks should be quartered by pedestrian-only walkways, with no buildings allowed to impinge beyond one quarter. In keeping with the nature of such a pedestrian-friendly shopping, eating, entertainment "Waterfront" neighborhood, no building would be allowed to be taller than existing zoning permits. This could also be an area of pocket parks and grassy dog parks. | 1
2. I take issue with the 2031 growth target, based as it is on an overly ambitious 2004 growth target. It should be reined back to a more typical growth target. The South Lake Union need not take on all the projected growth—give some to some of the other urban centers appropriately. | 2
3. Consider pedestrian overpasses over Mercer Street. Mercer Street will be quite wide and quite busy once the Mercer Project is completed, and without good walkways, can serve as a barrier to pedestrian access to the park and to the Waterfront neighborhood. | 3
4. I think there is insufficient understanding and consideration of potential wind-tunnel effects from tall buildings—both for pedestrians and for seaplane traffic. | 4
5. Confining seaplane traffic to one area, the southwest section approaching the lake, will make it difficult for seaplanes to land safely. They must consider wind and boat traffic, among other considerations, when planning their landings, and need to have broader options for landing, as they currently have. | 5
6. I propose an iterative process for granting building permits. I think there is an opportunity for self-correcting as permits are granted over time. One cannot sit here today and project with great accuracy what the affects of building out such a large area will be. As permits are granted, as buildings are constructed, there should be, with each subsequent permit under consideration, a process for evaluation inclusive of each permit already granted, or each project built out. If it appears we are heading in a wrong direction, there needs to be a process for correction. | 6

7. Recognize and value the environmental aesthetics anticipated by current SLU homeowners and residents. We need a see-through neighborhood for all to enjoy. Make decisions based not solely or even primarily on economic bases. Make SLU a national model, incorporating aesthetics, environmental soundness, mixed use, density, schools, dog parks, etc—and developing in a way respectful of all these uses and capable of drawing visitors and admirers from near and far.

Judith Freeman

Seattle WA 98121

Seattle Department of Planning and Development  
700 Fifth Avenue, Suite 1900  
PO Box 3419

April 8,2011

Dear Mr. Holmes,

The 600 plus page Environmental Impact Statement demonstrates a lot of work with its statistics but does not inspire creative invention. Where are the open spaces for people to congregate- -such as Westlake Square? The partially built mid rise sections of Amazon and Fred Hutchison Buildings do not invite strollers or places to congregate. Cities need focal points, a variety of scales for tables, chairs, awnings, umbrellas, coffee and ice cream, and pleasurable visual aspects which are the hallmarks of great cities.

1

How does pedestrian traffic traverse the high speed volume of cars along Mercer and Valley? Currently exiting from the South Lake Union Park, even in an automobile, is hazardous at best. The Alternative Plans #1 and #2 will make the Lakefront little more than a backyard for the tallest buildings. Instead of the earlier proposed Commons connecting the lake and downtown. The design of the Amazon buildings suggests we will have a grid of grim mausoleums of high rise commercial buildings, squared blocks adhering to lot lines. The focal point for the 300-400 foot towers will be the clubs, restaurants, penthouses at the top guarded by doormen and security systems- not conducive for diversity of families and children, or inviting of entrance by passers-by. For example the Fred Hutchison campus is not easily accessed or enjoyed by it's neighbors .

2

The Public Forum of March 23 showcased many speakers, most of whom do not live in the neighborhood and many do not even work in this area. Unfortunately time did not permit many who do live here to speak, so the result was a meeting dominated by developers who will benefit financially, but most of whom will not live in South Lake Union . I sincerely hope the future planning will contain more thought into community facilities and spaces which will attract an economically and culturally diverse population which lives in the area and doesn't just work in South Lake Union and then depart for the suburbs.

3

Respectfully yours,



Donald Frothingham, retired architect, former partner of Fred Bassetti and Co.

Active in Friends of the Pike Place Market, Westlake Square, Action Better Cities, Project Architect for the downtown Federal Office Building, Mercer Island Planning Commission for 6 years, Chairman for 2 years, MI Design Commission- 4 years, Chairman-1 year.

March 30, 2011

Seattle Department of Planning & Development  
Attn: James Holmes  
700 5<sup>th</sup> Avenue, Suite 1900  
PO Box 34019  
Seattle, WA 98124-4019

RE: Comment to DEIS & Support of Taller Buildings in South Lake Union (Alternative #1)

Dear Mr. Holmes:

When I first moved to Seattle from Nashville in 2004, I was driving on I-5 with a bird's eye view of South Lake Union. I couldn't help notice that particular area's flat buildings, parking lots and depressed appearance. I've lived all over the US and was discouraged with the appearance of this landscape in a City that boasts its progressiveness. I wondered why the City hadn't constructed taller more energy efficient buildings that have access to a beautiful lake and park – which would ultimately draw in more people to the area...especially if they could live in a building with great views of the lake and mountains. The scenery is breathtaking; but the city scape was not and its' right near Seattle's main attraction, the Space Needle.

By creating a more upwards flow with architecture and utilizing less land than a building spread out across valuable acreage; it gives the impression that Seattle's limits can reach the sky. Having taller buildings will allow for more "green scene" through landscaping and mature tree planting, provide space for wider sidewalks for pedestrians (safety) and bring in retailers who will enhance the economic stability of Seattle. By generating more revenue Seattle can use funds to better its schools, improve the transit system, provide more fire / police department services...all of which will draw in families to live in Seattle.

Now in 2011, I see some progress and upwards momentum in the South Lake Union area; but there's so much more that can be done to make it a point of destination for Seattle. New businesses, buildings, retailers, a grocery store, restaurants and condominiums/apartments have been added which is a wonderful start. It's nice to walk around that area, but it would be even better with the remaining undeveloped spots to add additional height and increase more green space.

I hope that Seattle City Officials will continue this positive momentum by allowing additional height and density in that area. Just look at what's being created and think about what can be created with this upwards mobility. It's exciting.

I feel confident that the decision makers of Seattle will make the right decision and allow for taller buildings in the South Lake Union area.

Respectfully, Lee Fulford

1

Holmes, Jim

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**From:** Arnie & Pat Gaillard ,  
**Sent:** Thursday, April 07, 2011 4:06 PM  
**To:** DPD\_Planning\_Division  
**Subject:** SLU EIS

Dear Mr Holmes,

We would like to express our thoughts about the SLU EIS.

- Please limit the growth targets for South Lake Union. This area should be developed as a neighborhood with parks and schools. | 1
- We are against Alternative #1 and #2. This would make this area either tall concrete buildings, or perhaps some residential buildings without the parks and schools mentioned above, and would also create an unacceptable traffic situation. Without schools, families with children would not be interested in moving into the area. This would also preclude low cost housing for low income or working families. | 2
- A real step-down to the lake would keep some visual access throughout SLU. Consider the views from existing buildings such as Miravella, Veer Lofts, Alterra Condos and Alley 24. Building towers near Lake Union would block everyone else's view of this lovely asset. | 3

Respectfully submitted,

Arnie and Pat Gaillard

GARNER CONSTRUCTION WBE, INC.



April 5, 2011

To Whom It May Concern:

My name is Jackie Garner and I am the owner of Garner Construction WBE Inc. , which has been operating cranes in Seattle for over 20 years. We are proud to bring quality crane and construction services with fully union crews to both private and public sector projects.

South Lake Union is headed in the right direction and needs additional height and density to get it right. Building tall in South Lake Union makes sense as it uses existing infrastructure. It makes the greatest use of public investments in existing transit, roads, parks, etc. Density in an urban center could be the catalyst for Seattle to have a wealth of public amenities in the urban core. It maximizes the investment the city has already made in the South Lake Union area. It is the most efficient use of tax dollars.

The current zoning encourages bulky buildings. But what we really need are interesting buildings with active retail. Much of South Lake Union is headed in the right direction. There are mixed-use buildings with pubs, restaurants and coffee shops at the street level. These give the neighborhood that sense of really being part of the city and not a warehouse wasteland. Allowing height means taller, thinner buildings that preserve light and air.

If we want to be a truly green, sustainable city – we need to say yes to density where it is appropriate. It's a simple solution to sprawl. Our future depends on it.

Why only plan until 2031? 20 years is not nearly enough for long range responsible planning. Growth will continue to happen, we should plan appropriately for it now, rather than pay the dear cost of continued

5301 Ravenna Avenue NE, Ste. #1  
Seattle, WA 98105-3286  
P: 206.524.4144 F: 206.524.2198

1

2

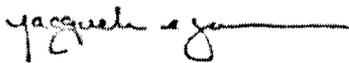
urban sprawl tomorrow. I urge our elected officials to consider the greatest good in the long term rather than the next election.

2 cont

The city should adopt Alternative 1, the most aggressive and progressive alternative because it benefits the most people and maximize our city resources. It's the right thing to do. Please do the right thing for the long-term future of our city and region. Do not hamstring the growth potential for South Lake Union as it will negatively impact the overall quality of life in Seattle. Do right by our planet and support the greatest growth in the part of town where it makes the most sense.

3

Thank you,  
Sincerely,



Jacquelin E. Garner  
President, Owner  
Garner Construction WBE, Inc.

9<sup>th</sup> and Aloha LLC  
2317 Rosemont Place W.  
Seattle, WA 98199

Seattle Department of Planning and Development  
Attn: James Holmes  
700 Fifth Ave., Suite 1900  
P.O. Box 34019  
Seattle, WA 98124-4019  
southlakeunioneis@seattle.gov

RE: South Lake Union Height and Density Draft Environmental Impact Statement (DEIS)

Dear Mr. Holmes:

We are owners of the office building at 753 9<sup>th</sup> Avenue North and we have reviewed the draft Environmental Impact Statement dated February 24, 2011. Our property is approximately 14,000 square feet and is located in the area identified as the Dexter sub district.

We are in favor of increasing the height and density in the South Lake Union area, agree with the stated objectives in the introduction to the Environmental Study and support Alternative 1 which provides the greatest potential density. Our comments pertain to the detail of the study and the alternatives.

1

Presented below are our comments and concerns:

1. Minimum Lot Size for Towers: Our property is located in the cross-hatched 60,000 SF per tower zone. The cost of acquiring 60,000 SF of land in this urban area will preclude tower development with the possible exception of the super wealthy whose projects don't need to make financial sense. If you calculate the amount of building that this provision allows on a 60,000 SF site, projects may not be financially feasible to build to the new code. Property owners in this zone will be limited to what they can do under the existing code. **Consider reducing the minimum SF for a tower to something more reasonable (say 30,000 SF) to provide some additional tower spacing without severely punishing those with property close to the lake.**

2

2. Lake Union Seaport Airport Flight Path: The Land Use section includes plans, policies and regulations for limiting the height of buildings within the FAA flight path; however the description of the flight path and required heights has not been determined. **This is a huge issue for effected properties and should be defined, vetted and presented to the public for comments prior to publishing the final EIS.**

3

3. Geology and Soils Mitigation: Mitigation Strategies state that there might be site – specific measures to deal with geology and soils impacts, which may include reducing the size of the project. **With the current technology available to solve geology and soils issues, there would be no reason to require reduction in the allowed building envelope.** It is up to the owner or developer to determine if it is worth the cost to implement necessary technology and earth science solutions.

4

4. Above grade parking: We agree with the provision allowing parking to be half above grade and half below grade. **Many if not most of the properties in South Lake Union have water table issues and the necessary parking for the various uses cannot be accommodated below grade only.**

5

5. Zoning Designations: There does not appear to be any direct benefit in the new zoning alternatives for a property owner with less than 22,000 SF on upland blocks and especially for 60,000 square feet on properties close to the waterfront. **It is imperative that the right to build under the existing code be retained especially for parcels that are too small to build a tower.**

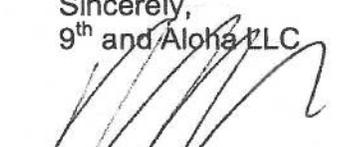
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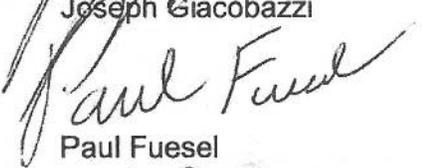
In general the zoning alternatives presented in the draft EIS penalize the small property owner. Small properties contribute to the character of the neighborhood and the diversity and vitality of the pedestrian environment and should be given more consideration in the next stages of the process.

7

Thank you for the opportunity to participate and share or comments. We would appreciate your consideration of our comments as you move forward with the process.

Sincerely,  
9<sup>th</sup> and Aloha LLC

  
Joseph Giacobazzi

  
Paul Fuesel

  
Nelson Davis

MARCY JOHNSON GOLDE

Seattle, WA 98109

April 11, 2011

Seattle Department of Planning and Development
Attn: James Holmes
700 Fifth Ave., Suite 1900
P.O. Box 34019
Seattle, WA 98124-4019
southlakeunioneis@seattle.gov

RE: Comments on DEIS for South Lake Union - Height and Density Alternatives

Requested Action: Prepare a supplement to this DEIS, showing the expected economic impacts, both positive and negative, of each Alternative, including the percentages of expected housing in each of the Area Median Income (AMI) classes. Also add AMI classes for 250% and 500% AMI.

GENERAL COMMENTS:

The DEIS totally fails to analyze the varying economic impacts of the four alternatives, yet they will be absolutely and dramatically different under each alternative. This must be corrected.

I support the growth targets for South Lake Union (SLU) in the current comprehensive plan as well as the Affordable Housing Goals. Both of these need to be applied both for the 2024 and the 2031 estimate dates. The growth rate for SLU should not increase for the period from 2024 to 2031.

The blocks around Lake Union and the Lake Union Park need to be zoned for their impact on, and need to protect, the special nature of these natural amenity for all of the city. The height should scale down toward the lake, thus preserving the valued outlooks from the new and older buildings in the southern portion of SLU.

The Cascade Neighborhood needs to retain its residential character and its current height and density zoning. Add the family friendly zoning along 8th Ave. to Alternative 3.

In order to become the envisioned Urban Center some space provisions for children needs to be made up-front in all Alternatives. These include schools, daycare, play areas and libraries.

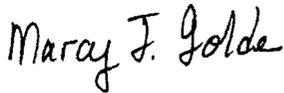
## HOUSING ANALYSIS

The analysis of Housing, one measure of the economic impacts, is also very deficient in several ways.

1. The DEIS shows that Alternative 4 currently contains 679 units of affordable housing, which is 13% of the current 3,075 housing units. Yet Seattle's goals for affordable housing is 64%. This gap is not recognized.
2. No estimates are available for any of the other Alternatives, each of which will undoubtedly increase the percentages of housing for people well above the Area Median Income. This vital information needs to be included.
3. Most of the incentives for increased low and medium income housing and amenities are currently available, but have not resulted in SLU coming even close to Seattle's goals. What are the estimates for the amenities that will be provided with each of the alternatives.
4. Despite these omissions and shortcomings, the DEIS reaches the unbelievable conclusion that: "No significant unavoidable impacts to housing are anticipated." This conclusion is wrong and in conflict with even the modest information presented.

A supplemental DEIS is needed to address the variety of economic impacts, both positive and negative, of the proposed zoning changes to height and density.

Sincerely yours,



Marcy J. Golde

**Holmes, Jim**

**From:** BARRY GOODING  
**Sent:** Friday, April 08, 2011 9:42 AM  
**To:** DPD\_Planning\_Division  
**Subject:** Comment on the Draft Environmental Impact Statement

Dear Mr. Holmes:

I work in a neighborhood in Seattle as well as enjoy spending time with family and friends in South Lake Union. I enjoy the local restaurants and amenities that the South Lake Union area has to offer. I do support taller buildings and more people in South Lake Union. Restricting heights is counter productive. We need more housing downtown and taller buildings will give us that. I believe more people will help the smaller, independent and locally owned retailers. More people also means more activity in the area which also means more eyes on the streets. I do not like walking in dark empty parking lots and more people and businesses would eliminate this.

We need better planning now in order to have a better future for all in this region. Well designed and constructed towers outside of the core downtown is better planning. I would rather see this than more six pack townhomes encroaching on our residential neighborhoods. South Lake Union is just blocks from downtown and should be where more growth is planned. We need more housing stock in the city and more tall buildings means more housing options and more overall housing stock means more affordable housing. Building taller requires developers to create public benefits such as childcare and pocket parks. This will be a win-win for everyone.

Seattle needs to walk the talk on environmental sustainability. Dense, compact, walkable neighborhoods reduce emissions and makes our city more livable. The South Lake Union neighborhood is along a transit corridor and will maximize transit use.

Building densely in South Lake Union will lead to more construction projects, meaning more family wage jobs. Concrete and steel construction is used when building taller buildings, which means more union labor. These types of buildings are usually sturdier, higher quality and long lasting. Increased height and density in South Lake Union creates more on-going revenue for the city through real estate tax, sales tax and utility tax. Living densely means that the city can serve more citizens at lower cost to taxpayers.

Please keep an open mind about taller buildings in the South Lake Union area. Please do the right thing for the long term future of our city and region. Do not constrain the growth potential for South Lake Union as it will negatively impact the overall quality of life in Seattle. The City should adopt Alternative 1, the most progressive and aggressive Alternative because it benefits the most people and maximizes our city resources. It's the right thing to do!

Thank you for your time and consideration!

Kim Gooding

Holmes, Jim

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**From:** Gabe Grant [ggrant@halrealestate.com]  
**Sent:** Friday, March 18, 2011 1:28 PM  
**To:** Conlin, Richard; Rasmussen, Tom; Bagshaw, Sally; Burgess, Tim; Godden, Jean; Clark, Sally; Licata, Nick; Harrell, Bruce  
**Cc:** DPD\_Planning\_Division; Holmes, Jim  
**Subject:** Support the Alternative 1 Rezone in SLU

Dear City Council Members,

I'm writing to encourage you to support the Alternative 1 Rezone in South Lake Union with 35,000SF Technology Office Floorplates. Some of our region's biggest growth engines are tech, biotech and global health. There is an incipient cluster of these sorts of businesses in SLU, but further expansion will likely require large building floorplates for efficiency and collaboration. Unfortunately, the DEIS contemplates towers with a maximum of 24,000SF commercial office floor plates, which are inadequate for many users. We need to build the kind of space our growth companies want, or they won't stay here.

I've walked to work from Eastlake to Downtown for years, passing through SLU on almost a daily basis. It has transitioned from a light industrial and surface parking lot wasteland to a burgeoning neighborhood with multifamily housing (low and high end), jobs, a grocery store, small/independent businesses, a new park and museum, and most importantly an incredible global health/biotech jobs cluster that is among the most successful in the nation. Helping these existing organizations grow and prosper and attracting new ones to join them is a key to our regional success.

I believe that in exchange for 35,000SF floorplates, developers could be asked to provide street level amenities and public open space, break up larger blocks, and limit overall height, which seems to be a lightning rod issue for some in the opposition. In short, we need SLU to play a key role in accommodating employment growth in our region. I encourage you to be responsive to the needs of our growth tenants, zone for the kinds of buildings they need and create great amenities and public spaces for our community.

All the best and thank you for your consideration.

Gabe

**Gabriel Grant** | Vice President  
**HAL Real Estate Investments Inc**  
2025 First Avenue, Suite 700, Seattle, WA 98121  
T 206 448 5080 F 206 448 5075

**Holmes, Jim**

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**From:** Serge Gregory  
**Sent:** Monday, April 11, 2011 6:45 PM  
**To:** DPD\_Planning\_Division  
**Subject:** Comment in support of increased height and density in South Lake Union

My name is Serge Gregory and I am a 40-year resident of Seattle. I am writing in favor of increasing the height allowances for new construction in the South Lake Union area. I recently returned from a visit to Vancouver, B.C. and was struck, after not visiting the city for several years, how much the energy and vibrancy of the city have increased. I attribute that to the taller and more concentrated residential development in the city. Vancouver now feels like a world-class city and I'm sure it's because so many more people now can live in the central downtown area. 1

I would like to see the same kind of urban residential density in Seattle. Tall office towers don't contribute to a city's livability if everyone leaves for the suburbs after working hours. But for obvious reasons tall residential buildings give life to a city 24 hours a day. I currently live in a house in Montlake, but I could see myself moving into a residential building in South Lake Union (especially after I retire) if I knew that I would be part of a vibrant urban neighborhood.

Serge V. Gregory

**King, Donna**

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**From:** Cecelia Gunn [ceceliagunn@gmail.com]  
**Sent:** Friday, April 08, 2011 1:01 PM  
**To:** Holmes, Jim  
**Subject:** South Lake Union Zoning Alternatives

I wanted to comment on the proposed zoning changes in the South Lake Union neighborhood. I am a Capitol Hill resident but live within a 2 minute walk across the freeway from South Lake Union so I spend a lot of time in that neighborhood.

I prefer Alternative 3 of the zoning proposals because of the lower heights directly bordering Lake Union. 300' tall buildings right on the lake shore will adversely affect the neighborhood feeling, creating a barrier (both physical and likely economically) with access to views and uses along Lake Union. Maintaining existing zoning along Fairview and within the eastern portion of the neighborhood will help temper the scale of redevelopment and help maintain some of the historic features in the neighborhood.

1

Creating an urban village with a diverse mix of uses, housing, and employment opportunities will best be served by alternative 3.

Thank you,  
Cecelia Gunn  
1004 Belmont Avenue East, #203  
Seattle, WA 98102  
206-491-2004

Holmes, Jim

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**From:** Charlie Hafenbrack  
**Sent:** Thursday, March 31, 2011 8:24 PM  
**To:** DPD\_Planning\_Division  
**Subject:** Comment on South Lake Union Height & Density Draft EIS

March 31, 2011

Seattle Department of Planning and Development  
Attn: James Holmes  
700 Fifth Ave., Suite 1900  
P.O. Box 34019  
Seattle, WA 98124-4019

Sent via e-mail: [southlakeunioneis@seattle.gov](mailto:southlakeunioneis@seattle.gov).

Dear Mr. Holmes

My company operates in the South Lake Union area. I am writing to encourage the City of Seattle to adopt Alternative 1, the most aggressive and progressive alternate in the South Lake Union Height and Density Draft EIS. 1

Building tall in South Lake Union makes sense as it uses existing infrastructure – making the greatest use of public investments in existing transit, parks and roads.

Building tall in South Lake Union also reduces sprawl and helps create a vibrant, walkable neighborhood that will be a model for development in our region.

We are fortunate to have a burgeoning hub of technology, life sciences and global health in the South Lake Union area; economic drivers that any city in the US would cherish.

We need to support that activity with housing of all types. Building tall is the most efficient way to do that.

Sincerely,

Charles Hafenbrack

**King, Donna**

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**From:** Julia Hailey [julia.hailey@gmail.com]  
**Sent:** Sunday, April 10, 2011 9:45 PM  
**To:** DPD\_Planning\_Division  
**Subject:** SLU EIS

I have lived in Seattle and the surrounding areas my entire life, and I have seen SLU transform from a gray and shapeless collection of buildings to an area revitalized by globally recognized businesses and great restaurants. As a native Seattlelite, it would be both heartening and rewarding to see our city take advantage of its resources and reshape the area further by rezoning and allowing for a more efficient use of development space. By rezoning in favor of commercial and residential properties, the South Lake Union area can become a more pedestrian and commuter friendly area that caters not only to those driving into the city for the day, but residents who would prefer to live near city center. An added bonus of revising current building restrictions and zoning is that the city's already established amenities like public transportation and the natural layout of the adjacent neighborhoods can be seamlessly joined to the new development making it an even more useful part of our vibrant city.

Thank you,

Julia Hailey

**Holmes, Jim**

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**From:** Charles Ryan Hastings  
**Sent:** Tuesday, March 22, 2011 4:03 PM  
**To:** DPD\_Planning\_Division  
**Subject:** South Lake Union EIS comment

To whom it may concern,

I work near South Lake Union and enjoy the many amenities the area offers – from the many dining options to the various retail shops. I admire the redevelopment efforts that have taken place and appreciate the city and community support that has already been provided to the area. It is my hope that the City will continue to support the growth of South Lake Union by adopting Alternative 1. This alternative will allow for smart and sustainable growth and will give the City of Seattle a wonderful location for its citizens to live, work, and play.

Thank you,

Ryan Hastings

**Holmes, Jim**

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**From:** Hamilton Hazlehurst [hamilton.hazlehurst@gmail.com]  
**Sent:** Monday, March 28, 2011 9:27 AM  
**To:** DPD\_Planning\_Division  
**Subject:** Comment on the South Lake Union Height & Density Draft EIS

I have worked in South Lake Union for 10 years and lived in this great neighborhood for 4. I could comment on why I support EIS Alternative No. 1 from many perspectives, but I choose to focus my remarks on the benefits this alternative has on the environment. Since I moved from the East Coast to live full time in Seattle over 30 years ago, I have always held a high appreciation of the un-built environment of the Northwest. Much to my regret during this time I have seen significant sprawl that has steadily eroded the relatively unblemished nature that I treasure in the areas surrounding Seattle. The most effective way to stem this erosion is to concentrate growth in our cities where it belongs. There are few better places within Seattle's boundaries to accommodate this growth than the South Lake Union neighborhood. Millions of dollars have been invested in its infrastructure that need not be invested elsewhere on the edges of our greater community.

New development in South Lake Union has been and will continue to be constructed using highly sustainable technologies unparalleled in most neighborhoods in the country. Our environment will benefit from more building like this not less. We should maximize the opportunity for dense urban growth constructed in a cutting edge sustainable manner.

Since moving to South Lake Union, I have come to rely heavily on the public transit infrastructure to take me just about anywhere I want to go. I have sold my second car. My carbon foot print has become significantly lower and I am saving thousands of dollars annually in the cost of car ownership. Concentrating jobs and homes close to transit is good for the environment and reduces our carbon emissions.

With increasing density South Lake Union has become a safer, walkable neighborhood. It will become much more so with the influx of those who will live in new residential towers. We must be mindful that contrary to what the renderings of potential high-rise development illustrated in the draft EIS suggest, the neighborhood in reality has limited parcels of land available for new development. The new zoning code should therefore maximize the potential for development on the remaining blocks.

I live in a high-rise condominium where most of the walls, floor and ceiling are shared with other residents. These shared surroundings make my home 3 times more energy efficient than the freestanding home I occupied in Magnolia. My energy bills are much lower during the winter heating season because I share heat retained in the building structure with my neighbors.

The height and density limits indicated in Alternative 1 will have the most positive impact on the neighborhood's potential to best serve the well-being of the planet while at the same time making it a great place to live and work for generations.

Hamilton Hazlehurst



April 11, 2011

James Holmes, Senior Urban Planner  
Department of Planning and Development  
700 5<sup>th</sup> Avenue, Suite 1900  
PO Box 34019  
Seattle WA98124-4019

Dear Mr. Holmes:

Vulcan's comments on and response to the South Lake Union Height and Density Alternatives Draft Environmental Impact Statement (DEIS) are set forth in this letter and the attached Exhibits.

Since adoption of Washington State's Growth Management Act in 1990, the State's and Seattle's public policy focus has been on preventing urban sprawl, protecting natural resource lands and critical areas, and on directing development to urban areas where growth can best be accommodated. Seattle's Comprehensive Plan continues this direction by concentrating growth in Urban Centers.

For more than 10 years, the City and the South Lake Union Community Council and other stakeholders in South Lake Union have focused on the potential of this neighborhood to gracefully accommodate the people and jobs that continue to come to Seattle. Much has been accomplished over the last 10 years including:

- Seattle adopts the South Lake Union Neighborhood Plan in 1998
- Seattle designates South Lake Union as an Urban Center in 2004; the Comprehensive Plan targets South Lake Union for 16,000 new jobs and 8,000 new households between 2004 and 2024
- Seattle adopts the South Lake Union Transportation Plan in 2004
- Seattle rezones much of South Lake Union from auto-oriented Industrial-Commercial zoning to Seattle Mixed (SM), which allows a broad range of uses, including housing, in 2005
- The South Lake Union Design Guidelines are updated in 2005. The South Lake Union Community Council and Department of Planning and Development conduct the Urban Form Study in 2008; and in 2011, the City completes the South Lake Union Urban Design Framework.

A rezone of South Lake Union to accelerate the development of more homes, more jobs, and a higher energy street and pedestrian environment is the next logical step in this effort to fully realize South Lake Union's role as a dynamic and lively Urban Center.

609 Bell Ave. S. Suite 600  
Seattle, WA 98104

206 442 2000 Tel  
206 442 3000 Fax

Assuming that the eventual preferred rezone alternative will combine elements of Alternatives 1, 2, and 3, we would like to share our thoughts about each alternative and which will actually yield the type of neighborhood the community envisions.

1

**Alternative 3**

This alternative demonstrates the "step-down towards the lake" model. This "step-down" model poses significant challenges to the creation of a diverse, interesting skyline and pedestrian environment. If commercial buildings cannot exceed 85' (same as current zoning), the neighborhood will end up with many more bulky, boxy buildings with zero community benefits and few pedestrian improvements. In addition, stepping heights down to the north would primarily protect private views of those already living up high (i.e. penthouses), and will not yield interesting open spaces on the street level for the public. In short, elements of Alternative 3 may look like a viable scheme on a zoning map, but in reality this Alternative encourages more bulky, boxy buildings and produces few if any public benefits.

**Alternative 2**

This alternative is better at encouraging a true mix of uses and building types. However, the proposed zoning on the Mercer Blocks would not create the activated park-front that the community wants. In order to fully achieve the values of transit oriented development and having 'eyes on the park' that the community has repeatedly endorsed, the Mercer Blocks need to be zoned higher than 160' for residential and 85' for commercial.

**Alternative 1**

We believe that Alternative 1 offers the most benefits for the most people in our city and region. South Lake Union represents one of Seattle's best opportunities for accommodating growth while minimizing demands for public investment in infrastructure. The taller, more slender, towers allowed under Alternative 1 provide superior options for a high-quality built environment and the public realm. Alternative 1 means more new jobs and housing in our city, and more revenues for City-provided services for the community. Creating dense, compact, walkable neighborhoods, like South Lake Union will be under Alternative 1, the most cost effective way to combat climate change. Taller buildings accommodate more people, and concentrating more people in an area is one of the most effective ways to save our planet. Allowing the increased heights contemplated by Alternative 1 serves the greater good.

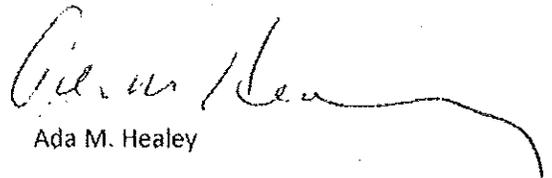
Attached to this letter you will find comments and suggestions that address a number of important issues and considerations including:

- Existing zoning should remain an option for developers who do not desire to take advantage of the upzone (Exhibit 1) | 2
- The Kenmore Air flight path and wind turbulence analysis should be based on sound aviation principles and correctly applied regulations (Exhibit 2) | 3
- The assessment of housing and the potential for housing displacement in the neighborhood (Exhibit 3) is inaccurate and should be revised. | 4
- To succeed, an incentive zoning program should incentivize, not penalize, and must be equitable (Exhibit 4). | 5
- There are additional development considerations (including parking, incentives, mid-block connectors, towers, minimum lot size, and others) that require further attention (Exhibit 5) | 6

South Lake Union is a critical economic engine for our City and region. Since 2004, \$3 billion has been invested in the area to develop a truly mixed-use community. In addition, there has been \$90 million of private investment in much needed public infrastructure improvements in Lake Union Park, the Seattle Streetcar and Mercer East Corridor. These investments are laying a solid foundation for the neighborhood's long-term growth. South Lake Union is a success story about re-inventing a people-friendly place that embraces its history and character while meeting the needs of the future. We must continue to grow smart which is why the right South Lake Union upzone is critical to the future of our community. The right upzone will ensure that South Lake Union is developed with the community in mind, with ample open spaces and pedestrian friendly plazas and more affordable housing. All of this will make South Lake Union's future even brighter than it is now. Experience shows that bold visions and courageous decision making are rewarded when the community and city work towards a common vision.

Thank you for the opportunity to comment on the Draft EIS.

Sincerely,



Ada M. Healey

**EXHIBITS**

- Exhibit 1      Development Under Existing Regulations
- Exhibit 2      Flight Path and Wind Turbulence/Wakes
- Exhibit 3      Housing
- Exhibit 4      Incentives
- Exhibit 5      Other Development Issues

**Exhibit 1 Development under Existing Zoning Regulations**

There should be a provision in the code that allows owners to develop to the regulations currently in effect even after the rezone. Department of Planning and Development (DPD) staff have repeatedly confirmed that this would be allowed, but it is not addressed in the DEIS. It should be explicitly stated that if developers were to choose this option, the zoning would be the same as it is today: there would be no new development standards and no changes to the existing code

## Exhibit 2     Flight Path and Wind Turbulence

### **Flight Path**

Kenmore Air has been providing float plane service out of Lake Union for 65 years and is a valuable part of the City of Seattle and the South Lake Union neighborhood. The continued safe operations of Kenmore Air are important, and Kenmore Air's operations must be considered in connection with any proposed rezone. Unfortunately, the discussion of the southerly flight path for Kenmore Air in the Draft EIS consists of inapplicable regulations incorrectly applied.

First, the Draft EIS states that FAA Part 77 regulations govern. But the FAA Part 77 regulations do not apply to the Kenmore Air seaplane base on Lake Union. The Part 77 regulations themselves make it clear that: "A *seaplane base* is considered to be an airport only if its sea lanes are outlined by visual markers." 14 C.F.R. §77.2. The NOAA Nautical Chart 18447 and the United States Coast Guard confirm that the sea lane for Kenmore Air is not outlined by visual markers. Therefore, this seaplane base is not an "airport" under FAA Part 77 regulations.<sup>1</sup> It may be appropriate to use some of the metrics in the Part 77 regulations, particularly the 1:20 approach surface slope that is commonly used in many aviation planning standards). But the City must do the necessary work to assess what is required for Kenmore's operations.

Second, WSDOT Aviation does not have "jurisdiction" to determine approach or departure surfaces. With respect to airplanes in flight, the federal government has completely preempted that area of regulation. *E.g., Gustafson v. City of Lake Angelus*, 76 F.3d 778 (6th Cir., 1996).

And with respect to land use regulation, the City of Seattle has the authority to zone and the responsibility to balance the various policies of the Growth Management Act. WSDOT Aviation's only role is to provide technical advice to the City. The City must verify that it is getting correct advice and cannot abdicate its responsibility under GMA to WSDOT.

Third, the flight path given to the City by WSDOT does not follow the FAA Part 77 criteria with one exception: the 1:20 approach slope. Everything else shown in that flight path is an improper application of Part 77. For example, it is twice as wide as a Part 77 path would be; and it curves while a Part 77 path would be straight. Because the flight path actually used by Kenmore does curve, and because Part 77 does not provide any guidance for curving or "offset" flight paths, the City must use other aviation planning criteria for this planning effort. There are FAA Advisory Circulars and applicable standards from the International Civil Aeronautics Organization that address such flight paths. Both use the same 1:20 approach surface slope. Using these standards will result in a flight path very similar to the one developed in cooperation with Kenmore in 2007, and similar to the flight paths that the City has been using for years for planning purposes.

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<sup>1</sup> If the Part 77 regulations did apply, the result would be imaginary surfaces around South Lake Union identical to those shown in SMC 23.68 for King County International Airport (Boeing Field), and those surfaces would affect all of South Union, most of Downtown, the east slope of Queen Anne, the west slope of Capitol Hill, and much of Fremont and Wallingford.

The Draft EIS also assumes that some kind of additional buffer below the approach surface will be required because of wind wakes behind and over buildings. While it is fine to identify wind wake as a potential issue, the Draft EIS is completely useless in determining what to do about it because the size and shape of wind wakes from buildings depend on their particular designs. The supposed need for an additional buffer below the approach surface is, according to the EIS, also for "safety". However, neither FAA Part 77 nor the other aviation planning criteria mentioned above require any such additional buffer and, in fact the EIS acknowledges that no such additional buffer is required by FAA regulations. One reason why no such buffer is required is that planes do not fly at the lowest altitude of the approach surface; they fly substantially above it. For example, the EIS states that the Kenmore air flight path is 150' in elevation at the Lake Union shoreline. Kenmore has told us that their floatplanes are typically at least 300' high when they pass over the shoreline.

The key issue here is not what Part 77 of the FAA regulations requires, because those regulations do not apply to the Kenmore Air seaplane base on Lake Union. Rather, the City needs to work with Kenmore Air to determine a reasonable and safe flight path in and out of Lake Union when taking off to the south and approaching from the south. The City did this in 2007, and all the parties involved determined that the 2007 flight path accurately reflected the actual flight paths and was safe and sufficient.

### **Wind Turbulence**

The Draft EIS makes some categorical statements about wind impacts that are inaccurate and misleading. The Draft EIS expressly acknowledges that the size of any building-induced wake zones "is defined by the shape of the building or structure. So any conclusions about wind impacts, including conclusions about the need for a "buffer" of lower building heights, are premature since there are no building shapes to be analyzed. Buildings should be analyzed at project permit level so that turbulence can be mitigated. The Draft EIS also fails to recognize that tall, slender buildings have a much different wake signature than wider, squatter buildings.

In order to give some more meaningful context to the overly broad and inaccurate statements in the DEIS, Vulcan has hired an expert wind turbulence consultant, Gradient Microclimate Engineering Inc. The comment letter from that expert firm is attached to this Exhibit and confirms the more general comments below.

### **Funnel Effects**

The DEIS states categorically that buildings create funnel effects that could extend into the lake. This statement is overly broad and misleading. A significant funnel effect occurs only when the space between nearby towers is narrower than the width of buildings. We are all familiar with this in Downtown where there are towers 200 to 300 feet wide which are separated by an 80 foot right-of-way. This effect will be reduced in South Lake Union generally because the towers would be narrow. With respect to buildings in the Waterfront subarea of the Draft EIS, the funnel effect should not be a concern because only one tower per block is proposed under all EIS alternatives for that area, and those towers could be spaced far enough apart to avoid funnel effects.

### Wake Effects Behind Buildings

The Draft EIS states that buildings would have an impact 10 times their height downstream. This statement is also misleading. It is true that the air stream is not fully restored until up to 10 times the height of a building, but 80 to 90 percent of that impact is typically dissipated within 3 times the height of a building. With buildings in the Waterfront subarea of the South Lake Union Draft EIS, this would mean that the great majority of the effect would not extend far into the lake. It is also possible to mitigate this wake effect by the shape and location of towers, which the Draft EIS neglects to mention.

### Wake Effects Over Buildings

The DEIS states that buildings have a wake effect over their tops that might be a concern and then calls for a "buffer" below the Kenmore Air flight path. Without building designs, any need for or delineation of a buffer is premature. Wake effect over buildings can potentially reach up to one half the building heights. This potential effect can be mitigated by shape of the building, especially the building top. As noted in our comments on the Kenmore Air flight path, the EIS should also recognize that planes do not fly at the lowest altitude of an approach surface. Typically, planes both approach and depart well above this surface. This is yet another instance in which the City has simply not done the work necessary to support the conclusions in the Draft EIS, and where subsequent, project-specific review will be able to identify and mitigate impacts.



April 5, 2011

City Investors LLC  
505 5<sup>th</sup> Avenue South  
Suite 900  
Seattle, Washington 98194

Dear Mr. Pearce:

Re: Review of Building Wakes Discussion  
South Lake Union Height and Density Alternatives  
Draft Environmental Impact Statement  
GmE File: 11-023

City Investors LLC requested Gradient Microclimates Engineering Inc. (*GmE*) to review the wind wake analysis in the South Lake Union Height and Density Alternatives Draft Environmental Impact Statement (DEIS). The DEIS reviews potential rezoning alternatives that could allow increased building heights in the City of Seattle's South Lake Union Urban Center. *GmE* is a specialty service engineering company providing expertise in microclimate studies, including wind loading analysis and the effects on wind created by structures. We summarize herein our response to generic comments found in the EIS relating to the possible impacts of tall building wakes on the Lake Union area and seaplane flight operations in Lake Union.

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GME

Wind flowing over buildings creates effects in the lee of the building, generally referred to as wake effects. These include a 3-dimensional zone or bubble of reduced wind speed and increased turbulence, separated from the undisturbed wind by a shear layer where the properties of the oncoming wind are mostly unchanged. The shear layer represents a transition area between the outer and wake zones, the size and intensity of which becomes weaker with increasing distance downwind of the building.

The size and shape of building wakes, including the shear layer, are commonly defined by the distances in the downwind directions (vertical, horizontal, and lateral) in which the mean velocity is reduced and the turbulence is increased as compared to the oncoming wind. Information on the size of wakes is mostly derived from a limited number of generic model scale experiments.

On the basis of this limited experimental evidence, it is generally accepted that reduced wind speeds in the wake of buildings, referred to as 'the velocity defect', and increased turbulence, 'turbulence excess', can persist more than 10 times the building height downwind, two times the building height in the vertical direction; and up to three times the building width in the lateral (side-to-side) direction. Similar statements repeated in the Draft EIS are misleading for the following reasons.

First, the largest wake influences apply to cubical buildings which diminish substantially, relative to building height, for taller buildings with height to width ratio of 3 or more. Second, the stated size of the wake assumes that the velocity defect and excess turbulence are fully dissipated. In practice, the size of the wake is much smaller where a moderate velocity defect of approximately 20%, and excess turbulence of about 20% above the ambient levels are permissible. As such, for a tall building and a square cross plan form, the building wake influence would extend approximately: 4 building heights downwind, 50% of the building width on each side of the building, and not more than 50% of the building height above the building. These numbers could be reduced further by careful placement of the building on the site, and refined design of its plan form including consideration of edge and roof shape.

Experimental evidence confirms that for tall slender buildings, the size of the wake is substantially smaller relative to building height as compared to cube-like buildings. This can be explained by the fact that the wake behind taller buildings will be filled with wind flowing down due to vertical pressure gradients.

The proximity of buildings can also create funneling of wind flow between buildings. The effect is primarily influenced by the spacing but also by building size, shape and edge details to a lesser extent. The DEIS states categorically that buildings create funnel effects that could extend into the lake. This statement is overly broad and misleading. A significant funnel effect occurs only when the space between nearby towers is narrower than the width of the buildings. You are familiar with this in the Downtown Seattle area, where there are towers 200 to 300 feet wide separated by an 80 foot right-of-way. This effect will be reduced in South Lake Union generally because the towers would be narrow. With respect to buildings in the Waterfront study area of the DEIS (north of Mercer Street), the funnel effect should not be a concern because only one tower per block is proposed under all EIS alternatives for that area, and those towers could be spaced far enough apart to avoid funnel effects. For a given gap between buildings, the funnel effect can be reduced by shaping the building plan form.

Wind statistics used in the DEIS are described by wind speed and direction probability maps derived from many years of airport wind data. Located approximately 5 miles south of downtown Seattle, Boeing Field provides the basic information necessary and appropriate for current considerations. Figure 1 illustrates a probability map of wind speed and wind direction derived by GME from Boeing Field data. It is noteworthy, however, that the Waterfront area in the DEIS is at a distance of one mile in the wake of the Seattle downtown core, for southerly winds. Because of that, this area is already commonly exposed to significant ambient turbulence, more so than for other wind directions. Higher levels of ambient turbulence also assist with reducing the impact of wake effects, which is not pointed out in the DEIS.

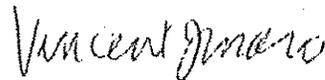
Based on the foregoing discussion, we conclude as follows:

- (i) The practical extent of building wake effects is much smaller than the values stated in the DEIS document;
- (ii) The size of wakes behind tall slender buildings is much smaller than for cubical buildings relative to their respective heights.
- (iii) The size of the wake can be reduced by proper proportioning of the building height and plan form including shaping the edges and roof.
- (iv) Funneling of wind through buildings can be avoided and mitigated with proper placement of buildings on adjacent parcels and by shaping the plan form, especially in the Waterfront area where only one tower per block is proposed;
- (v) The final impact of any buildings in the South Lake Union Urban Center can only be determined and mitigated, if necessary, during conceptual and detailed design phases of the project.

Please advise us of any questions or comments.

Yours truly,

*Gradient Microclimate Engineering Inc.*



Vincent Ferraro, M.Eng., P.Eng  
Principal  
GME11-023

**Exhibit 3. Housing Conditions**

The Housing section (Section 3.9) of the DEIS does not accurately describe existing housing conditions within the South Lake Union Neighborhood. Nor does it accurately evaluate how future housing in the neighborhood would be affected under each of the proposed alternatives.

The neighborhood unit count is incomplete and the characterization of subsidized housing is misleading. The unique character of housing stock in South Lake Union, and the Cascade area in particular, results in a large number of relatively lower cost non-subsidized and non income restricted affordable housing units. Because the DEIS only accounts for subsidized and income restricted housing and fails to include a market survey of all housing in the neighborhood, the amount of housing affordable to people earning below 80% Area Median Income (AMI) is significantly understated. A comprehensive market study of all housing in South Lake Union should be undertaken to ensure an accurate description of existing housing conditions.

The DEIS states that "...development of residential towers through incentive zoning provisions would increase the potential for displacement of existing wood-frame buildings and older single family residences located throughout the neighborhood, but particularly in the Cascade subarea." This statement is provided without any additional details or back-up. Contrary to the statement, a complete study of such housing shows that none of these sites meet the minimum tower lot size established in the DEIS (22,000SF), and most could not achieve the minimum lot size even if assembled with adjacent properties. In fact, very few units are at risk of being displaced under any of the alternatives. Those properties thought to be at risk should be researched and the actual number of units truly at risk should be quantified and presented in the next draft of the EIS. Below is an analysis of existing housing in South lake Union.

**Neighborhood Unit Count**

Table 3.9-1 is a detailed list that only adds up to 2,680 units. Although the text acknowledges that "the table contains a listing of *most* [emphasis added] of the apartments and condominiums in the neighborhood," there is no explanation for why the list excludes a number of multi-family residential properties as well as several older single family residences and duplexes/triplexes. In addition, some of the unit counts are incorrect. Correcting these errors adds 216 more residential units to the neighborhood inventory:

<b>Name/Location</b>	<b>Total Units</b>
Nautica Condominiums	73
Alterra Condominiums	59
Republican Street Apartments 1114-1126 Republican	16
The Pontius 215 Pontius Ave N	14

Harrison Apartments 800 Harrison Street	12
Cascade Shelter Project 224 Minor	12
Neptune Apartments correct unit count is 234 not 222	12
Corazon Apartments 101 Eastlake Ave E	6
Art Stable 516 Yale Ave N	5
Triplex 417 Minor Ave N	3
Blue Duplex 1190 Republican	2
Duplex 766 Thomas Street	2
House 413 Minor Ave N	1
House 1206 Republican	1
David Colwell Building correct unit count is 124 not 126	(2)
<b>TOTAL MISSING FROM TABLE</b>	<b>216</b>

<sup>1</sup> Note: We have not included short-term housing at Pete Gross House (70 units), SCAA House (80 units) or the Immanuel Community Services Shelter (15 beds). We have not included former single family homes whose use has already been changed from residential to commercial.

Section 3.9.1 references 3,075 housing units in SLU (based on the DP D Urban Center/Village Residential Growth Report, 3Q 2010) but the 3,075 units appears to be in error – it includes approximately 179 units that we cannot locate in SLU.

It would be prudent for Table 3.9-1 to be comprehensive and for it to align with the 3,075 units identified in the 3Q 2010 DPD Urban Center/Village Residential Growth Report. Further, the units included in that report should be identified and verified for accuracy.

### **Subsidized Housing**

Table 3.9-1 has an error. Borealis is shown as having 53 unrestricted units. This is incorrect. The project has only 3 unrestricted units. The majority of the units (50) are restricted to 80% of Area Median Income.

The reference in Section 3.9.1 to “more than 400 City-funded affordable housing developments” is both inaccurate and misleading. First, it is inaccurate because in Table 3.9-2, the number of units included in projects in the “City” column totals 522 (based on unit counts provided in Table 3.9-1 for those same projects), not 400.

Secondly, it is misleading because the intent should be to identify **all income restricted housing regardless of funding source**. In addition, Table 3.9-2 is missing several of the income restricted projects in the neighborhood. So, instead of 8 projects with 400 income-

restricted housing units representing 13% of total dwelling units, the statistics should correctly state that there are 15 projects with 727 units of income restricted housing representing 25% of total dwelling units in the neighborhood:

Name/Location	# of Income Restricted Units	Notes
Jensen Block	30	
Cairns	30	
Alley24	35	
David Colwell	124	
Kerner Scott	40	
Bart Harvey	49	Excluded from EIS Table
Canaday House	83	
Cascade Shelter Project	12	Excluded from EIS Table
Compass Cascade	34	
Brewster	35	
Casa Pacifica	65	
Lakeview	59	
Mirabella	31	
Denny Park	50	
Borealis	50	Excluded from EIS Table
<b>Total Income Restricted</b>	<b>727</b>	<b>25% of total dwelling units in SLU</b>

<sup>1</sup> Note: 25% is based on 727 divided by corrected total neighborhood units (2,680 from table 3.9-1 plus the 216 units missing from that table for a total of 2,869 residential units). In addition, only 100 of the income restricted units are located outside of the Cascade area; therefore, 34% of units in the Cascade area are income restricted.

#### **“Income Restricted” vs. “Affordable”**

The SLU neighborhood has a large number of non income restricted units that nonetheless are actually **affordable to people earning less than 80% AMI** based on rent limits established by HUD. Excluding these units from the study is misleading because it dilutes the real number of

housing units in the neighborhood that actually are "affordable" regardless of subsidy or income limitations.

Planning goals for growth of additional affordable housing is also expressed in terms of housing that is "affordable to" certain incomes, rather than a requirement that they be income restricted. Based on a market survey of current rents at non income restricted apartments in SLU, there are an additional 404 units of housing that are affordable to people earning between 0% and 80% of AMI:

Name/Location	# of "Affordable" non-income restricted units	Affordability
Carolina Court	72	50% to 80% AMI
Mercer View	67	50% to 80% AMI
Union Bay Apartments	53	50% to 80% AMI
Alcyone	47	50% to 80% AMI
Carlton Apartments	30	50% to 80% AMI
Grandview	25	30% to 50% AMI
Carolyn Manor	22	50% to 80% AMI
Republican Street Apartments	16	50% to 80% AMI
Dexter Lake Union	15	50% to 80% AMI
The Pontius	14	30% to 50% AMI
Harrison Street Apartments	12	50% to 80% AMI
502 Minor	11	50% to 80%

		AMI
Corazon Apartments	6	50% to 80% AMI
Alley24 (market units)	4	50% to 80% AMI
Triplex 417 Minor Ave N	3	50% to 80% AMI
Blue Duplex 1190 Republican	2	50% to 80% AMI
Duplex 766 Thomas St	2	50% to 80% AMI
Borealis (market units)	1	50% to 80% AMI
House 1206 Republican	1	50% to 80% AMI
House 413 Minor Ave N	1	50% to 80% AMI
<b>TOTAL ADD'L AFFORDABLE UNITS</b>	<b>404</b>	

Including ALL affordable units (not just those that are income restricted) the neighborhood actually has 1,131 units of affordable housing or nearly 40% of all dwelling units in the neighborhood.

**Potential for Displacement**

In Alternative 1, the Cascade area is contemplated for new zoning that would include incentive zoning. The following chart reviews housing in Cascade that is "relatively lower-cost affordable housing" [wording from EIS] and estimates the potential for displacement. It excludes existing subsidized/income restricted housing which would be protected as well as any housing constructed since 1990 since that is new product with considerable value that is unlikely to be redeveloped. As can be seen in the chart below, a number of the sites currently improved with older housing units are not suitable for redevelopment with towers because the sites do not meet the minimum lots size for towers (22,000 SF per the DEIS):

**Cascade Area Housing Displacement Potential**

Name	# of Units	Comments	Potential Units Lost
Carolina Court	72	Lot size <22k sf minimum	0

		(no assemblage potential)	
Grandview	25	Lot size <22k sf minimum Would need to be assembled with 3 adjacent parcels owned by 2 different property owners to be of an adequate size	25
Corazon	6	Lot size <22k sf minimum Would need to be assembled with 3 adjacent parcels owned by 3 different property owners to be of an adequate size	6
Carlton	30	Lot size <22k sf minimum (even if assembled with adjacent parcel)	0
Single Family House 1206 Republican	1	Lot size <22k sf minimum (even if assembled with adjacent parcels)	0
502 Minor Apartments	11	Lot size <22k sf minimum (even if assembled with adjacent parcels)	0
Blue Duplex 1190 Republican	2	Use already changed to commercial	0
The Pontius	14	Lot size <22k sf minimum (no assemblage potential)	0
417 Minor Ave N	3	Lot size <22k sf minimum (no assemblage potential)	0
<b>Subtotal "lower-cost"</b>	<b>164</b>		<b>31</b>
Income Restricted Units	628		0
<b>TOTAL</b>	<b>792</b>	<b>Including both subsidized and non income restricted "lower cost" units</b>	<b>31</b>

<b>AFFORDABLE</b>		<b>identified above</b>	<b>3.9% of Affordable Units</b>
1990+ Construction	1,062	Excludes restricted Units included above	0
<b>TOTAL CASCADE</b>	<b>1,854</b>		<b>31 1.7% of Total</b>

The table above identifies 31 units in two properties potentially at risk for displacement in Cascade; however both parcels would need to be assembled with adjacent parcels owned by multiple property owners which reduces their potential for being displaced. In addition, in Section 3.9.3 of the DEIS, under "Mitigation Strategies", the Grandview is on a list of older brick apartment buildings in South Lake Union, that could be potentially listed for historic preservation in exchange for TDRs (transferable development rights), drastically reducing its potential for displacement. Therefore, the most aggressive assumption is that both the Corazon and the Grandview units are displaced even though it is considerably less likely that the Grandview units will be lost. In the most aggressive assumption, potential displacement units represent just 3.9% of the "affordable" housing supply in the Cascade area and less than 2% of all housing in Cascade. Removing Grandview from the list would result in just 6 units of lower cost housing being potentially displaced in Alternative 1.

An expanded analysis beyond the Cascade area and throughout the entire SLU neighborhood has similar results. Since most of the housing stock outside of the Cascade area was constructed post-1990, very little housing would be subject to potential displacement:

#### Non-Cascade Area SLU Housing Displacement Potential

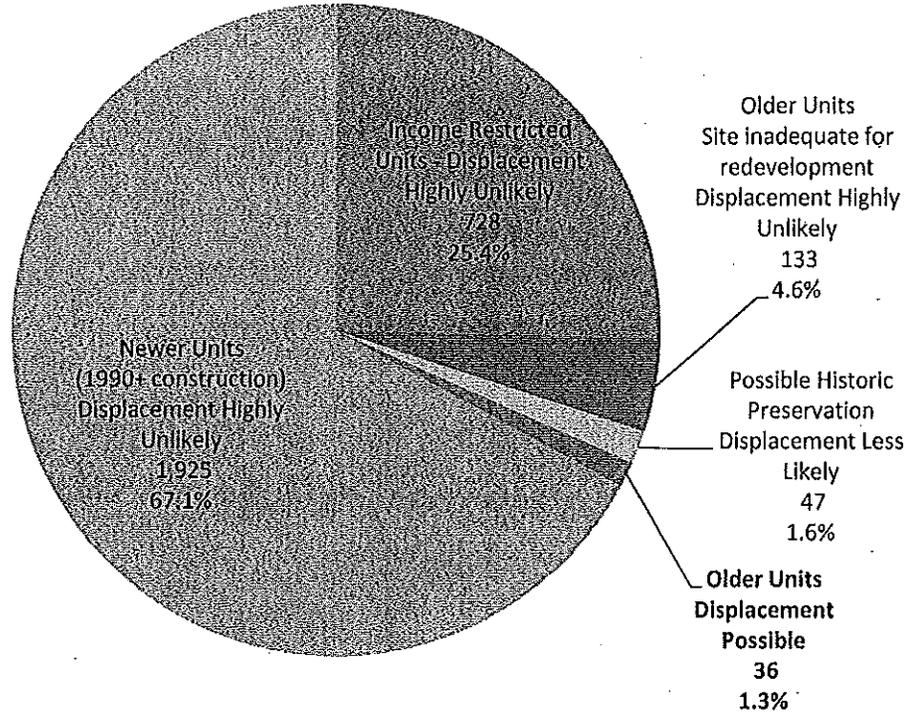
Name	# of Units	Comments	Potential Units Lost
Republican Street Apartments	16	Lot size <22k sf minimum Could be assembled with adjacent parcel to be of an adequate size	16
Harrison Apartments	12	Lot size <22k sf minimum Would need to be assembled with adjacent parcel to be of an adequate size	12
Carolyn Manor	22	Lot size <22k sf minimum Would need to be assembled with adjacent parcel to be of an adequate	22

		size	
766 Thomas	2	Lot size <22k sf minimum Could be assembled with adjacent parcel to be of an adequate size	2
<b>Subtotal "lower-cost"</b>	<b>52</b>		<b>52</b>
Income Restricted Units	100	(Borealis & Denny Park Apartments)	0
<b>TOTAL AFFORDABLE</b>	<b>152</b>	<b>Including both subsidized and non income restricted "lower cost" units identified above</b>	<b>52</b>
1990+ Construction	863	Excludes restricted Units included above	0
<b>TOTAL NON-Cascade Area</b>	<b>1,015</b>		<b>52</b> <b>5.1% of Total</b>

We also note that the Carolyn Manor Apartments, like the Grandview in the Cascade area, is on a list of older brick apartment buildings in South Lake Union, that could be potentially listed for historic preservation in exchange for TDRs (transferable development rights), drastically reducing its potential for displacement. Therefore, in the most aggressive assumption, potential displacement units represent about 5% of the all housing in the non-Cascade area of South Lake Union.

Combining the results of both the Cascade area analysis and the non-Cascade area analysis shows that of 83 units that potentially could be displaced, more than half may be identified for historic preservation, leaving just 36 units that are likely to be displaced. That represents only 1.2% of total housing stock in South Lake Union. The following chart illustrates the potential for displacement of housing in all of South Lake Union under Alternative 1:

## SLU Neighborhood Housing Displacement Potential - Alternative 1



In Alternative 2, most of the Cascade area retains existing zoning. The blocks south of John Street and east of Fairview are contemplated for new zoning that would include incentive zoning. Three apartment properties are located within those blocks. Both the David Colwell Building and the Brewster Apartments have already had their TDRs purchased, which preclude further height increases on those properties. Therefore, within the Cascade area, only one property with just 6 units (Corazon Apartments) would be at risk of displacement in Alternative 2. Therefore, the potential for housing unit displacement in Alternative 2 is similar to Alternative 1.

Alternatives 3 and 4 both retain existing zoning in the Cascade area of the neighborhood. Therefore, in each of these alternatives, there is equal risk of housing displacement due to normal development trends; in fact, **incentive housing provisions would create no additional potential for displacement of housing in Alternatives 3 compared to "no action" Alternative 4.**

**Exhibit 4 Affordable Housing Incentives**

We have long supported affordable housing in South Lake Union. A reasonable incentive zoning program, which contains *incentives* rather than penalties, can be a useful tool in helping to provide affordable housing. The EIS, however, should justify the heights at which incentive zoning payments begin for extra residential square footage. The Draft EIS assumes an 85-foot base height for all the alternatives, rather than leaving this decision to the City Council. The EIS should also recognize that unless sufficient bonus heights are allowed, the incentives will not be economically feasible.

The provision for affordable housing must be reasonable and equitable, including being equitable with similar locations in the City. When the City studied incentives for the Downtown zones immediately across the street from the South Lake Union Urban Center, it was determined that the base height for residential should be 290 feet. The situation is not different immediately across the street in South Lake Union. The base zoning heights before providing affordable housing incentives should be justified in the same manner in both the Downtown DMC zones just south of Denny Way and in the proposed South Lake Union SM zones just north of Denny Way.

Chapter 23.58A ("Incentive Provisions") is referenced multiple times throughout the DEIS, suggesting that the intent is for 23.58A to apply to SLU when it comes to affordable housing performance and/or payment in lieu incentive payments associated with an upzone.

The following table illustrates the material difference between incentive zoning payments for the DMC zone and incentive zoning payments under 23.58A if all development above 85 feet requires incentives, as suggested in the DEIS. The two "buildings" have exactly the same physical characteristics in terms of podium and total height, number of stories, average floor plate size etc.:

	<b>23.58A</b>	<b>DMC Zoning</b>
Stories	39	39
Height	400'	400'
Total SF	467,600	467,600
Average Floor Plate SF	10,500	10,500
# of residential Units	520	520
<b>Bonus SF (incentive payment due)</b>	<b>325,500</b>	<b>125,500</b>
Incentive Payment to 85'	Free	Free
<b>Incentive Payment 85'-290'</b>	<b>\$3,977,400</b>	<b>\$100,000</b>

Incentive Payment 290' + 4 floors	\$795,480	\$630,000
Incentive Payment Next 3 floors	\$596,610	\$630,000
Incentive Payment Final 4 floors to 400'	\$795,480	\$1,050,000
Total Incentive Payments	\$6,164,970	\$2,410,000
<b>Total Incentive Payments after adjustment*</b>	<b>\$6,164,970</b>	<b>\$2,376,970</b>
Total per Bonus SF	\$18.94	\$18.94
<b>Total per Total SF developed</b>	<b>\$13.18</b>	<b>\$5.08</b>
<b>Total per Residential Unit</b>	<b>\$11,856</b>	<b>\$4,571</b>

*\*In the DMC zone, incentive payment maximum is \$18.94/sf of bonus area; therefore the total incentive payment in this example would be adjusted downward*

The above example illustrates that it would be more than 2.5 times more expensive to develop an identical residential tower under 23.58A (with the incentives required for all residential over 85 feet as suggested in the DEIS) as it would under DMC zoning. We strongly encourage a review of the proposed incentive housing payment option so that it is on par with payments incurred for the same type of development in the adjacent Denny Triangle neighborhood

## **Exhibit 5      General Development Comments**

### **Compare View and Massing Impacts to what COULD be built under current zoning**

The view and massing analyses in the Draft EIS consistently compare views of full build-out potential under Alternatives 1, 2 and 3 to views of **existing** actual development in South Lake Union. This is incorrect and misleading. The correct comparison is what **could** be built out under current zoning (Alternative 4) to what could be built under a rezoned condition (Alternatives 1, 2 or 3). Rather than provide this correct analysis, the EIS compares each and every zoning and massing simulation to photographs of what is currently constructed in South Lake Union. This approach should be corrected in the Final EIS.

### **Reconsider Requiring another Survey of South Lake Union Historic Resources**

A mitigation strategy proposed in the Historic Resources Section of the DEIS is to require developers to prepare another survey of South Lake Union historic resources. To date, there have been 7 surveys of historic buildings in South Lake Union, as follows:

- Steinbrueck and Nyberg, Eastlake/Cascade: An Inventory of Buildings and Urban Design Resources, 1975
- Seattle Commons EIS, 1995
- Addendum to the Seattle Commons/South Lake Union FEIS, 1995
- Department of Neighborhoods Historic Resources Survey, 2000
- Karin Link, Cascade Neighborhood Inventory and Survey, 2004
- Technical Report, South Lake Union Streetcar Project: Cultural and Historic Resources, 2005
- Mercer Corridor Project Environmental Assessment, which had to comply with the Federal 4F process and identify potential landmark buildings based upon Federal Register landmark criteria, 2008

This last survey in 2008, the Mercer Corridor Project Environmental Assessment, had to comply with the Federal 4F process and identify potential landmark buildings based upon Federal Register landmark criteria. These requirements are more stringent than local landmark criteria. We question what an eighth survey would yield that hasn't already been identified.

### **Allow One Tower per Block Regardless of Lot Size**

We would like to clarify language regarding the one tower per block limit for blocks closest to Lake Union as depicted in Alternatives 1 and 2. Table 1-1 indicates the blocks with a one-tower limit would need to be at least 60,000 square feet in site area. In the DEIS descriptions of Alternatives 1 and 2, Sections 2.3.3 and 2.3.4 describe "a maximum of one tower block (equivalent to a minimum 60,000sf lot size)". We believe the intent of the one-tower requirement on these blocks is to limit towers to one per block, regardless of lot size. On blocks where a one-tower limit is enforced, a minimum lot size is irrelevant.

### **Incentivize Mid-Block Connectors**

The Transportation Section (Section 3.13) includes a list of pedestrian and bicycle improvements on Page 3.13-82. One of the proposals is a **requirement** that projects developing above the base height implement a mid-block connector. Vulcan has incorporated mid-block connections in many South Lake Union projects. It can be used successfully in both commercial and residential projects. However, it is not universally applicable to all sites, either as a transportation/ connectivity mitigation or as an urban design measure. It should continue to be encouraged as an enhancement to connectivity and reviewed through the standard Design Review Process, where its potential benefits and drawbacks can be analyzed on a site-by-site basis. Alternatively, it could be encouraged as an incentive.

### **Take Into Consideration Availability of Alternative Modes of Transit in Meeting Parking Demand**

Table 3.13-15 of the DEIS shows an assumed parking supply of 1 space per 1,000 SF of non-retail (office) development. This is consistent with the parking maximum allowed Downtown. Imposing this parking maximum in South Lake Union is not appropriate yet, since it currently has inferior transit service in comparison to Downtown. Since many employees cannot travel to their workplace via transit, this results in a greater need for parking. Over time, as transit service is expanded and improved in South Lake Union, it is reasonable to assume a parking ratio of 1 space per 1,000 SF of office development.

In the meantime, TMPs (Transportation Management Programs) should be used as individual projects are planned and developed. Some developers might provide lower parking ratios in exchange for a reduced Traffic Impact Fee.

Table 4-2  
Responses to Public Comments Received During the Comment Period

Comment Number	Response
<b>Letter 55: Collins, Arlan and Woerman, Mark L.</b>	
1	<b>Support Alternative 1.</b> The comments are noted.
<b>Letter 56: Coney, Donald John</b>	
1	<b>Economic Development.</b> The City issued the Scoping Notice for this Draft EIS on November 18, 2008 and invited comments on the EIS scope through December 18, 2008. Through 2009, the City worked with neighborhood stakeholders and the public to address concerns raised by the scoping comments. Based on this process, the City revised the EIS alternatives and finalized the scope of the EIS. Economic development was not included as part of the EIS scope.
2	<b>Joint Vision for Uptown and South Lake Union Urban Centers.</b> The comments are noted.
3	<b>Population Growth.</b> The comments are noted.
4	<b>Support Alternative 1.</b> The comment is noted.
5	<b>Benefits of Growth.</b> The comment is noted. As the commenter states, the EIS does not discuss the economic benefits of the proposal. As noted in WAC 197-11-402, EISs are required to identify potential significant adverse impacts, but are not required to address beneficial environmental impacts.  Please see Final EIS Section 3.2 for a discussion of the City's Comprehensive Plan economic development policies.
6	<b>Infrastructure Improvements.</b> The comments are noted.
<b>Letter 57:Corr, Saroj</b>	
1	<b>Support Additional Height and Density.</b> The comments are noted.
<b>Letter 58:Coulter, Jefferson</b>	
1	<b>Connect Height to Benefits.</b> The comment is noted.
2	<b>Adequate Infrastructure.</b> The comment is noted.
3	<b>Prefer Mid-Rise and Street-Level Activity.</b> The comment is noted.
4	<b>Improved Neighborhood Connections.</b> The comment is noted.
<b>Letter 59: Cree, Russ</b>	
1	<b>Support Increased Density.</b> The comments are noted.

Comment Number	Response
2	<b>Benefits of Growth.</b> The comments are noted.
<b>Letter 60: Crossley, Katharine</b>	
1	<b>Oppose Increased Heights.</b> The comments are noted.
2	<b>Impacts of Growth.</b> The comments are noted. Please see the discussion of these topics in the EIS.
3	<b>Views.</b> The comments are noted. Please see the revised discussion of views in this Final EIS.
4	<b>Conclusion.</b> The comments are noted.
<b>Letter 61: Curran, Lori Mason</b>	
1	<b>Support Density and Flexibility.</b> The comments are noted.
2	<b>Benefits of Height and Density.</b> The comments are noted.
3	<b>Support Alternative 1.</b> The comments are noted.
4	<b>EIS Images.</b> The comment is noted. As established in the EIS scope, the aesthetics analysis is required to consider impacts of the alternatives at build-out.
5	<b>Quantify Benefits.</b> The comment is noted. As required in WAC 197-11-402, EISs are required to identify potential significant adverse impacts, but are not required to address beneficial environmental impacts.
<b>Letter 62: Curtis, Jared</b>	
1	<b>Urban Forest.</b> The comment is noted. City of Seattle goals for tree preservation and planting in South Lake Union are consistent with its designation as an urban center.
2	<b>Support Alternative 3 and Current Zoning.</b> The comments are noted. Please note that existing zoning standards are maintained in the Cascade neighborhood under all alternatives except Alternative 1.
3	<b>Availability of Services.</b> The comments are noted. Please see the discussion of these topics in the EIS.
<b>Letter 63: Dasler, Joshua</b>	
1	<b>Support Alternative 1.</b> The comments are noted. As noted in the comment, economic benefits were not included in the scope of the EIS. As noted in WAC 197-11-402, EISs are required to identify potential significant adverse impacts, but are not required to address beneficial environmental impacts. For a

Comment Number	Response
	<p>discussion of transportation impacts, please see Draft EIS Section 3.13.</p> <p>Please see also Final EIS Section 3.2 for a discussion of the City's Comprehensive Plan economic development policies.</p>
<b>Letter 64: Douglas, Lloyd</b>	
1	<p><b>Air Quality and Denny Way.</b> The air quality implications of the proposed plan were addressed based on hot-spot modeling of the signalized intersections that would be most affected by project-related traffic. This included modeling of three intersections along the Mercer corridor because they were the most congested locations that are projected to be affected. No other specific roadways were considered in the air quality review, but traffic-related pollutant emissions would be less than at the locations that were considered and so would not be expected to be significant.</p>
2	<p><b>Shadows and Habitat.</b> There are no one-day shadow studies. All 15 shadow graphic figures are contained in Appendix D to the Draft EIS – Figure 29 through 41. As shown, they depict possible shadow impacts for each development alternative at 9 am, noon and 3 pm -- for each of the four key solar days of the year.</p> <p>Based on the Draft EIS shading study, shading would only occur during mornings and evenings in the winter when many plants are dormant. None of the proposed alternatives would shade South Lake Union for the entire day, and most urbanized wildlife can move from shadier areas to sunnier areas as needed. In addition, the potential shading impacts to wildlife and potential mitigation measures (e.g., removing existing underwater debris that currently causes shade), would be assessed at a project level for each high-rise construction during the SEPA review process. Revisions to the shading analysis contained in Final EIS Section 3.4 do not alter this conclusion.</p>
3	<p><b>Flight Path and Birds.</b> Please see the response to Letter 13, Comment 90 above.</p>
4	<p><b>Step Down.</b> The alternatives described in the Draft EIS are based on public input and comment, but do not incorporate formal or de facto City of Seattle policy related to the concept of "step down." As described in the Draft EIS, the alternatives do generally decrease in height from the south boundary of the neighborhood toward the north. The one exception is Alternative 1, which includes building height increases in the block north of Mercer Street.</p>
5	<p><b>Shadow Studies.</b> The shadow analysis shows the impacts on Denny Park, Lake Union Park and Cascade Park. Please see the revised figures in Final EIS Section 3.4. The shadow images depict possible shadow impacts for each development alternative at 9 am, noon and 3 pm -- for each of the four key</p>

Comment Number	Response
	solar days of the year. Because the location of possible future open spaces is not known, a shadow analysis was not conducted.
6	<p><b>Flight Path.</b> Subsequent to issuance of the Draft EIS, additional review of the flight path was conducted (see Appendix F). This analysis included a review of how seaplane lanes are utilized (including runway utilization, flight tracks, and piloting techniques), an evaluation of the aircraft fleet used by floatplane operators, and documentation of the performance characteristics of the various floatplane aircraft. Several Federal Aviation Administration (FAA) and International Civil Aviation Organization (ICAO) planning documents that have applicability in the establishment of approach/departure protection boundaries for curving approach and departure procedures such as those used on Lake Union were also reviewed.</p> <p>Based on this analysis, and in coordination with WSDOT Aviation, a revised flight path was identified (see Section 3.2 of this Final EIS). This revised flight path differs from that shown in the Draft EIS in that portions are narrower than the previous flight path, the curvature is more gradual, and the east-west legs of the flight path have shifted slightly to the north. Specifically, the southern boundary has shifted 400-500 feet north so that the southern boundary lies north of Valley Street and is generally aligned with Broad Street. The southern boundary now crosses Aurora Avenue North at about Mercer Street. Similarly, the northern boundary of the flight path shifted 200-300 feet north, crossing the Lake Union shoreline at roughly Highland Drive and crossing Aurora Avenue just north of Ward Street. Please see Section 3.4 Aesthetics for revised images associated with the revised flight path.</p> <p>An additional mitigation measure has been recommended in this EIS – that a project-level analysis of wind impacts be required for all new development above the base height permitted under the Seattle Mixed zoning.</p>
7	<p><b>Southeast Flight Path.</b> The flight path that is referred to in the comment, and located near the southeast portion of Lake Union, is used for inbound aircraft when wind conditions are from the north. Proposed building heights are not a constraint to aviation in this area.</p>
8	<p><b>Wind Analysis.</b> This programmatic EIS included a qualitative analysis of potential wind impacts. From a quantitative perspective, numerous factors will affect wind patterns in an urban area. The most critical of these are building heights, location, orientation, and massing. At the subarea level of analysis, it is impossible to accurately forecast these factors for all development in the subarea. Therefore, the programmatic analysis contained in the EIS describes a range of potential vertical and horizontal impact areas, depending on the type of development that may occur.</p>

Comment Number	Response
	<p>At the same time, it is agreed that it is essential to conduct a quantitative wind analysis of individual development proposals to ensure that wind impacts on the Lake Union Seaport Airport are mitigated. Therefore, an additional mitigation measure requiring a project-level analysis of wind impacts for all new development above the base height permitted under the Seattle Mixed zoning is recommended. The approach to this analysis would include the following steps:</p> <ol style="list-style-type: none"> <li>1. Construct a physical scale model of the proposed project and/or the maximum building envelope allowed at that site, with the surrounding physical context (i.e., existing buildings, topography, etc.)</li> <li>2. Install the model into a boundary layer wind tunnel and measure velocities and turbulence levels along the prescribed flight path with and without the proposed project</li> <li>3. Test for prevailing wind directions and/or wind directions that are expected to have an impact on the flight path</li> <li>4. Present resulting data in a form to allow for quantitative comparison between existing and proposed conditions</li> <li>5. Provide a written report summarizing the methodology, results and interpretation of the results against any available published aviation standards for shear layers and turbulence levels. Analysis results would require interpretation by an aviation specialist who would assess the acceptability of these specific results for the aircraft actually used at this location.</li> </ol> <p>In addition, the City may consider requiring additional analysis to address the following questions:</p> <ul style="list-style-type: none"> <li>• Additional review to address potential future adjacent development (i.e., a future configuration which may augment or mitigate predicted impacts in the future)</li> <li>• Testing of mitigation schemes if the project results are unacceptable (i.e., the wind tunnel study could be then used to help define a height, size and location on that site that could be acceptable).</li> </ul> <p>Wind wakes are not anticipated to affect wave patterns.</p> <p>The potential impact of wind wake on recreational sailing on Lake Union was not included in the scope of the EIS.</p>
9	<p><b>Housing Affordability.</b> The discussion in Draft EIS Section 3.9.2 states that there are a number of factors that impact the potential for affordable housing, including development costs, property values, market demand, individual property owner goals, and opportunities for financing affordable housing. Under any of the alternatives, these factors will affect the actual number of</p>

Comment Number	Response
	affordable units that are built in the neighborhood.
10	<b>Impact on Other Neighborhoods.</b> The comment is noted. The impact of potential future development of affordable housing in South Lake Union on affordable housing development in other neighborhoods was not included in the scope of the EIS. Because of the unique location and character of the South Lake Union neighborhood, development in the neighborhood is not anticipated to significantly impact development activity in other neighborhoods.
11	<b>Historic Structures and TDR.</b> As the commenter notes, there is a relationship between the affordable housing inventory and the preservation of historic buildings. However, data to support a quantitative analysis is not available. The use of TDR is identified as a potential mitigation strategy for preservation of local landmark properties.
12	<b>Neptune.</b> Mention of the Neptune has been deleted from the study.
13	<b>Older Buildings.</b> The comment that older buildings often create a view corridor over them and serve as important visual clues for orientation has been included in the Final EIS, see Section 3.4.
14	<b>Transitions.</b> The comment is noted.
15	<b>Cascade Park.</b> The comment is noted.
16	<b>Bread Loaves Versus Pin Towers.</b> The comment is noted; there is no reference to pin towers or the Vancouver model in the aesthetics discussion. It should be noted that limitations on both the number of towers per block and minimum lot size, combined with maximum average floor plate size under incentivized zoning, means that the areas of average tower floor plates will always be less than half – and sometimes as small as a quarter – of the lot size.
17	<b>Podium Garages.</b> The comment is noted. Above grade parking may be necessitated by specific site conditions (especially sub-surface conditions) on some properties within the neighborhood – if the property owner is to realize the full potential of the density and height allowed under incentive zoning. Please see Final EIS Section 3.4, which includes a mitigating strategy to discourage above-grade parking.
18	<b>Tower Spacing.</b> The comment regarding the need for spacing between towers is noted. A determination was made that this is a particular concern for residential buildings, since these are anticipated to be the tallest buildings allowed under incentive zoning and the building type where occupant safety is typically of the greatest concern. Residences are also the building type most

Comment Number	Response
	concerned with privacy issues. Consequently, a recommendation for a minimum tower separation of 60 feet, measured perpendicular to the face of the building, has been added as a potential mitigation in the Final EIS for residential towers built under incentive zoning.
19	<b>Republican Street.</b> The City's travel demand model includes the ramp from northbound SR 99 onto Republican Street. Based on the travel model output, there is no need to mitigate traffic on Republican Street since it would not trigger an impact. Including Republican Street as a study corridor would not change the outcome of the Draft EIS.
20	<b>Denny Way and Mass Transit.</b> Draft EIS Table 3.13-13 and Figures 3.13-19 through 3.13-22 show the Denny Way traffic impacts under all alternatives. The commenter correctly notes that increased traffic congestion causes increases to transit travel times, as is described in Page 3.13-31. However, based on the threshold of significance used to identify transit impacts, increased transit travel times do not necessarily affect load factors. Therefore, increased travel time does not, in and of itself, cause an impact.
21	<b>Mitigating Measures.</b> The relationship of mitigation to transportation concurrency is discussion in Draft EIS Section 3.13. The mitigating measures described in the EIS support the alternatives as described in each mitigation strategy section. None of the mitigating measures would prevent implementation of the alternatives.
<b>Letter 65: Doxsee, Marcella</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
<b>Letter 66: Ehlebracht, Mike</b>	
1	<b>Support Increased Density.</b> The comment is noted.
<b>Letter 67: Estes, Brian</b>	
1	<p><b>Land Use Consistency.</b> The comment refers to a summary statement in Chapter 1 of the Draft EIS. Chapter 3.8, Land Use, contains the full review of the City plans, policies and regulations considered in the Draft EIS. Please also see Final EIS Section 3.2 for a discussion of the Shoreline Management Program.</p> <p>The 2031 numbers discussed in Draft EIS Section 2.2 are not targets, but are estimates intended to provide additional context for understanding potential long-term growth in South Lake Union. As noted in the discussion in this section, the estimate is for analysis purposes only and does not represent policy intent by the City. In order to disclose the potential range of capacity</p>

Comment Number	Response
	<p>needed to meet a future growth target for South Lake Union, both 2024 and 2031 are considered in the analysis.</p> <p>In Section 3.8, additional discussion of the Seattle Comprehensive Plan Urban Village Element states that formal City action to establish a growth will occur in the future based on an analysis of the capacity of all of the urban centers and other areas of the City. Consistent with the Washington Growth Management Act, the South Lake Union 2031 growth target that is ultimately proposed and adopted by the City will reflect an understanding of overall development capacity.</p>
2	<p><b>Building Heights.</b> The City of Seattle does not have a formal or informal policy of building height step down toward the water. As described in the Draft EIS, the alternatives do generally decrease in height from the south boundary of the neighborhood toward the north. The one exception is Alternative 1, which includes building height increases in the block north of Mercer Street.</p>
3	<p><b>Flight Path.</b> The EIS was circulated to WSDOT Aviation, the implementing agency for the FAA. Please see Comment Letter 1.</p> <p>This programmatic EIS included a qualitative analysis of potential wind impacts. From a quantitative perspective, numerous factors will affect wind patterns in an urban area. The most critical of these are building heights, location, orientation, and massing. At the subarea level of analysis, it is impossible to accurately forecast these factors for all development in the subarea. Therefore, the programmatic analysis contained in the EIS describes a range of potential vertical and horizontal impact areas, depending on the type of development that may occur.</p> <p>At the same time, it is agreed that it is essential to conduct a quantitative wind analysis of individual development proposals to ensure that wind impacts on the Lake Union Seaport Airport are mitigated. Therefore, an additional mitigation measure requiring a project-level analysis of wind impacts for all new development above the base height permitted under the Seattle Mixed zoning is recommended. The approach to this analysis would include the following steps:</p> <ol style="list-style-type: none"> <li>1. Construct a physical scale model of the proposed project and/or the maximum building envelope allowed at that site, with the surrounding physical context (i.e., existing buildings, topography, etc.)</li> <li>2. Install the model into a boundary layer wind tunnel and measure velocities and turbulence levels along the prescribed flight path with and without the proposed project</li> <li>3. Test for prevailing wind directions and/or wind directions that are</li> </ol>

Comment Number	Response
	<p>expected to have an impact on the flight path</p> <ol style="list-style-type: none"> <li>4. Present resulting data in a form to allow for quantitative comparison between existing and proposed conditions</li> <li>5. Provide a written report summarizing the methodology, results and interpretation of the results against any available published aviation standards for shear layers and turbulence levels. Analysis results would require interpretation by an aviation specialist who would assess the acceptability of these specific results for the aircraft actually used at this location.</li> </ol> <p>In addition, the City may consider requiring additional analysis to address the following questions:</p> <ul style="list-style-type: none"> <li>• Additional review to address potential future adjacent development (i.e., a future configuration which may augment or mitigate predicted impacts in the future)</li> <li>• Testing of mitigation schemes if the project results are unacceptable (i.e., the wind tunnel study could be then used to help define a height, size and location on that site that could be acceptable).</li> </ul>
4	<p><b>Mass Transit Mitigation.</b> Refer to comment #63, Letter #13 regarding mass transit as mitigation. An EIS is not required to identify funding for mitigation measures. The TDM and parking strategy analysis is based on the California Air Pollution Control Officers Association (CAPCOA)'s report Quantifying Greenhouse Gas Mitigation Measures. The relevant data is included in the appendix to the Draft EIS, and the full report is available on CAPCOA's website.</p>
5	<p><b>Impact of Neighboring Development.</b> The comments are noted. The aesthetics analysis accurately displays potential impacts of development under the different alternatives and as described in the methodology in Draft EIS Section 3.10 and refined in Final EIS Section 3.4. It is correct that future potential development outside the study area was not projected. Such a projection would have been speculative and beyond the scope of this EIS.</p> <p><b>Downtown Views.</b> The final scope for the EIS establishes that the view analysis will consider impacts to SEPA protected public viewpoints and corridors. View perspectives analyzed in Section 3.10 include viewpoints designated by SMC 25.05.675.P. As noted, additional locations in and near the neighborhood have been included as part of the analysis, these include views from public or quasi-public viewpoints, as well as from designated scenic routes. As shown in Draft EIS Figure 3.10.22, a total of fifteen viewpoint locations were analyzed.</p>
6	<p><b>Shadow Effects.</b> The comment is noted. Please see Final EIS Section 3.4 for a revised analysis of shadow impacts, including additional proposed mitigation</p>

Comment Number	Response
	measures. It should be noted that the analysis still concludes that, with appropriate mitigation, significant adverse shadow impacts are not anticipated.
7	<b>Shoreline Management Program.</b> Please see Final EIS Section 3.2.
<b>Letter 68: Estes, Jill</b>	
1	<b>Jobs and Housing Concentration.</b> As the commenter notes, South Lake Union is one of six urban centers in Seattle. The 2031 numbers discussed in Draft EIS Section 2.2 are estimates intended to provide additional context for understanding potential long-term growth in South Lake Union. As noted in the discussion in this section, the estimate is for analysis purposes only and does not represent policy intent by the City. In order to disclose the potential range of capacity needed to meet a future growth target for South Lake Union, both 2024 and 2031 are considered in the analysis.
2	<b>Building Heights.</b> The comments are noted. Although the proposal does not include any changes to land use designations in the designated shoreline areas, Draft EIS Appendix D shows the potential for shading along the Lake Union shoreline. Shadows are discussed in Draft EIS Section 3.10.9 and shading impacts to plants and animals in Section 3.4.2. Please see also revised shadow images in Final EIS Section 3.4.
3	<b>Preserve Step Down in Heights.</b> The City of Seattle does not have a formal or informal policy of building height step down toward the water. As described in the Draft EIS, the alternatives do generally decrease in height from the south boundary of the neighborhood toward the north. The one exception is Alternative 1, which includes building height increases in the block north of Mercer Street.
<b>Letter 69: Evans, David R</b>	
1	<b>Support Increased Height.</b> The comments are noted.
<b>Letter 70: Felber, Jim</b>	
1	<b>Public Meeting Comments.</b> The comment is noted.
2	<b>Transportation.</b> Draft EIS Appendix E presents the statistical evidence demonstrating that the MXD model is an appropriate tool available for analyzing dense mixed use environments, such as South Lake Union.
3	<b>Prefer Alternative 3.</b> The comment is noted.
4	<b>Diversity.</b> The comments are noted. Please refer to Final EIS Section 3.5 for a discussion of schools.

Comment Number	Response
5	<b>School Facility.</b> The comment is noted. Please refer to Final EIS Section 3.5 for a discussion of schools.
<b>Letter 71: Foster, Dan</b>	
1	<b>Larger Floor Plate Size.</b> The comment is noted. Beginning in late 2008 and continuing through 2009, the City worked with interested citizens and other stakeholders to define the alternatives to be studied in the EIS. Through this public process, the standard for commercial floor plate size was reduced from 35,000 sf to 24,000 sf. Please see the discussion of alternatives eliminated from consideration, Draft EIS Section 2.3.7. Conceivably, larger floor plate size may be appropriate in certain areas of the study area and localized study may be warranted.
<b>Letter 72: Ferretti, Peter</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
<b>Letter 73: Fiedorczyk, Bryan</b>	
1	<b>Support Increased Building Height and Density.</b> The comments are noted.
<b>Letter 74: Freeman, Judith</b>	
1	<b>Support Alternative 3 with Modification.</b> The comments are noted.
2	<b>2031 Growth Estimate.</b> The 2031 numbers discussed in Draft EIS Section 2.2 are not targets, but are estimates intended to provide additional context for understanding potential long-term growth in South Lake Union. As noted in the discussion in this section, the estimate is for analysis purposes only and does not represent policy intent by the City. In order to disclose the potential range of capacity needed to meet a future growth target for South Lake Union, both 2024 and 2031 are considered in the analysis.  In Section 3.8, additional discussion of the Seattle Comprehensive Plan Urban Village Element states that formal City action to establish a growth will occur in the future based on an analysis of the capacity of all of the urban centers and other areas of the City. Consistent with the Washington Growth Management Act, the South Lake Union 2031 growth target that is ultimately proposed and adopted by the City will reflect an understanding of overall development capacity.
3	<b>Pedestrian Bridge.</b> The City of Seattle does not support any pedestrian bridges across Mercer Street as they were not incorporated as part of any adopted plans, such as the Pedestrian Mobility Plan, Bicycle Master Plan, or Mercer Way Corridor Plan.

Comment Number	Response
4	<b>Wind Impacts.</b> Consideration of potential pedestrian-level wind impacts was not included in the scope of this programmatic EIS. Such may be appropriate, however, for certain project-specific development within the study area.
5	<b>Additional Flight Path.</b> A secondary flight path is located near the southeast portion of Lake Union and is used for inbound aircraft when wind conditions are from the north. Proposed building heights are not a constraint to aviation in this area.
6	<b>Iterative Building Permit Process.</b> The comment is noted.
7	<b>Value Environmental Aesthetics.</b> The comment is noted.
<b>Letter 75: Frothingham, Donald</b>	
1	<b>Community Character.</b> An EIS differs from a planning document, which tries to establish the vision and policy direction described in the comment. WAC 197-11-400 requires that an EIS provide impartial discussion of significant environmental impacts and describe mitigation measures that could avoid or minimize adverse impacts.
2	<b>Impacts of Building Heights.</b> The comments are noted. Please see the EIS for discussion of the topics in the comment.
3	<b>Public Meeting Comments.</b> The comment is noted.
<b>Letter 76: Fulford, Lee</b>	
1	<b>Support Additional Height and Density.</b> The comment is noted.
<b>Letter 77: Gaillard, Arnie and Pat</b>	
1	<b>Growth Target.</b> The 2031 numbers discussed in Draft EIS Section 2.2 are not targets, but are estimates intended to provide additional context for understanding potential long-term growth in South Lake Union. As noted in the discussion in this section, the estimate is for analysis purposes only and does not represent policy intent by the City. In order to disclose the potential range of capacity needed to meet a future growth target for South Lake Union, both 2024 and 2031 are considered in the analysis.  Please see Final EIS Section 3.5 for a discussion of schools and Draft EIS Section 3.16 for a discussion of parks.
2	<b>Opposed to Alternative 1 and 2.</b> The comment is noted.
3	<b>Step Down to Lake Union.</b> The City of Seattle does not have a formal or informal policy of building height step down toward the water. As described in

Comment Number	Response
	<p>the Draft EIS, the alternatives do generally decrease in height from the south boundary of the neighborhood toward the north. The one exception is Alternative 1, which includes building height increases in the block north of Mercer Street.</p>
<b>Letter 78: Garner, Jackie</b>	
<b>1</b>	<p><b>Support Height and Density.</b> The comments are noted.</p>
<b>2</b>	<p><b>2031 Planning Horizon.</b> A 20-year planning horizon is considered to be an appropriate time horizon to recognize changing conditions and technology, while still allowing for a long-range perspective.</p>
<b>3</b>	<p><b>Support Alternative 1.</b> The comment is noted.</p>
<b>Letter 79: Giacobazzi, Joseph, Paul Fuesel, Nelson Davis</b>	
<b>1</b>	<p><b>Support Height and Density.</b> The comment is noted.</p>
<b>2</b>	<p><b>Minimum Lot Size for Towers.</b> The comment is noted.</p>
<b>3</b>	<p><b>Flight Path.</b> Subsequent to issuance of the Draft EIS, WSDOT Aviation undertook additional review of the flight path. This analysis included a review of how seaplane lanes are utilized (including runway utilization, flight tracks, and piloting techniques), an evaluation of the aircraft fleet used by floatplane operators, and documentation of the performance characteristics of the various floatplane aircraft. Several Federal Aviation Administration (FAA) and International Civil Aviation Organization (ICAO) planning documents that have applicability in the establishment of approach/departure protection boundaries for curving approach and departure procedures such as those used on Lake Union were also reviewed.</p> <p>Based on this analysis, and in coordination with WSDOT Aviation, a revised flight path was identified (see Section 3.2 of this Final EIS). This revised flight path differs from that shown in the Draft EIS in that portions are narrower than the previous flight path, the curvature is more gradual, and the east-west legs of the flight path have shifted slightly to the north. Specifically, the southern boundary has shifted 400-500 feet north so that the southern boundary lies north of Valley Street and is generally aligned with Broad Street. The southern boundary now crosses Aurora Avenue North at about Mercer Street. Similarly, the northern boundary of the flight path shifted 200-300 feet north, crossing the Lake Union shoreline at roughly Highland Drive and crossing Aurora Avenue just north of Ward Street. Please see Section 3.4 (Aesthetics) for revised images associated with the revised flight path.</p> <p>An additional mitigation measure has been recommended in this EIS – that a project-level analysis of wind impacts be required for all new development</p>

Comment Number	Response
	above the base height permitted under the Seattle Mixed zoning.
4	<b>Geology and Soils.</b> As the commenter notes, site specific mitigation will be defined as part of project specific review.
5	<b>Above grade parking.</b> The commenter is referring to a development assumption described in Section 3.10 that future parking would be one-half below grade and one-half above grade. This was intended as an assumption to allow an estimate of development envelope for the aesthetics analysis and not intended to suggest a standard for future development.
6	<b>Minimum Lot Size.</b> The existing underlying Seattle Mixed zoning designation would be retained for all property in the neighborhood.
7	<b>Small Property Owner Consideration.</b> The comment is noted.
<b>Letter 80: Golde, Marcy J.</b>	
1	<p><b>Economic and Affordable Housing Impact Analyses.</b> The City issued the Scoping Notice for this Draft EIS on November 18, 2008 and invited comments on the EIS scope through December 18, 2008. Through 2009, the City worked with neighborhood stakeholders and the public to address concerns raised by the scoping comments. Based on this process, the City revised the EIS alternatives and finalized the scope of the EIS, which does not include an analysis of economic impacts. Please see Final EIS Section 3.2 for a discussion of the City's Comprehensive Plan economic development policies.</p> <p>The Draft EIS housing analysis provides a programmatic review of housing affordability goals; growth in affordable housing in the neighborhood, and a qualitative discussion of the difference between the alternatives in the potential for affordable housing development. Reliable data is not available to develop a quantitative 20-year forecast of affordable housing development under each alternative.</p>
2	<b>Economic Analysis.</b> Please see the response to Comment 1 in this letter, above. As indicated in WAC 197-11-402, EISs are required to identify potential significant adverse impacts, but are not required to address beneficial environmental impacts.
3	<b>Growth Estimates.</b> The comments are noted. Affordable housing development levels to meet housing affordability goals under the 2031 growth estimate is shown in Draft EIS Table 3.9-5.
4	<b>Building Heights.</b> The comments are noted. As described in the Draft EIS, the alternatives do generally decrease in height from the south boundary of the neighborhood toward the north. The one exception is Alternative 1, which

Comment Number	Response
	includes building height increases in the block north of Mercer Street. Existing zoning standards are retained in the Cascade neighborhood for all alternatives except Alternative 1.
5	<b>Provisions for Children.</b> The comments are noted. Please see Draft EIS Section 3.16, Open Space and Recreation. See Final EIS Section 3.5 for a discussion of schools.
6	<p><b>Housing Analysis.</b> Please see the response to Comment 1 of this letter, above. It is acknowledged and disclosed in the Draft EIS that the affordable housing goals in the South Lake Union are not currently being met.</p> <p>Draft EIS Section 3.9.2, Housing, describes that incentive zoning provisions, including developer financial contributions to affordable housing, may be used to achieve increased residential building heights. Through use of these incentives, the action alternatives may have the potential to result in an increased number of affordable units than the No Action Alternative.</p> <p>The discussion in Section 3.9.2 states that there are a number of factors that impact the potential for affordable housing, including development costs, property values, market demand, individual property owner goals, and opportunities for financing affordable housing. Under any of the alternatives, these factors will affect the actual number of affordable units that are built in the neighborhood.</p>
7	<b>Economic Impacts.</b> Please see the response to Comment 1 of this letter, above.
<b>Letter 81: Gooding, Kim</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
<b>Letter 82: Grant, Gabe</b>	
1	<p><b>Support Alternative 1/35,000 sf Floorplates.</b> The comments are noted. Beginning in late 2008 and continuing through 2009, the City worked with interested citizens and other stakeholders to define the alternatives to be studied in the EIS. Through this public process, the standard for commercial floor plate size was reduced from 35,000 sf to 24,000 sf. Please see the discussion of alternatives eliminated from consideration, Draft EIS Section 2.3.7. Conceivably, larger floor plate size may be appropriate in certain areas of the study area and localized study may be warranted.</p>
<b>Letter 83: Gregory, Serge</b>	
1	<b>Support Increased Height.</b> The comment is noted.

Comment Number	Response
<b>Letter 84: Gunn, Cecelia</b>	
1	<b>Support Alternative 3.</b> The comments are noted.
<b>Letter 85: Hafenbrack, Charles</b>	
1	<b>Support Alternative 1.</b> The comments are noted.
<b>Letter 86: Hailey, Julia</b>	
1	<b>Support Rezoning.</b> The comment is noted. As described in Chapter 2, the proposal considered in the EIS is the potential use of incentive zoning as a strategy to achieve neighborhood plan goals and other public benefits. Incentive zoning would allow increased height and density if public benefits defined in City code are provided. The underlying Seattle Mixed zoning designations and standards would not be rezoned. Under the three action alternatives, the existing Industrial Commercial zone would be rezoned to Seattle Mixed (SM). This change in zone is intended to achieve consistency within the neighborhood rather than to permit greater height or density.
<b>Letter 87: Hastings, Ryan</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
<b>Letter 88: Hazlehurst, Hamilton</b>	
1	<b>Support Alternative 1.</b> The comments are noted.
<b>Letter 89: Healey, Ada M</b>	
1	<b>Alternatives Comparison.</b> The comments are noted.
2	<b>Existing Zoning.</b> As described in Chapter 2, the proposal considered in the EIS is the potential use of incentive zoning as a strategy to achieve neighborhood plan goals and other public benefits. Incentive zoning would allow increased height and density if public benefits defined in City code are provided. Existing Seattle Mixed (SM) zoning designations and standards would be retained under all alternatives. Under the three action alternatives, the existing Industrial Commercial zone would be rezoned to Seattle Mixed (SM). This change in zone is intended to achieve consistency within the neighborhood rather than to permit greater height or density.
3	<b>Flight Path.</b> Subsequent to issuance of the Draft EIS, WSDOT Aviation undertook additional review of the flight path. This analysis included a review of how seaplane lanes are utilized (including runway utilization, flight tracks, and piloting techniques), an evaluation of the aircraft fleet used by floatplane operators, and documentation of the performance characteristics of the various floatplane aircraft. Several Federal Aviation Administration (FAA) and

Comment Number	Response
	<p>International Civil Aviation Organization (ICAO) planning documents that have applicability in the establishment of approach/departure protection boundaries for curving approach and departure procedures such as those used on Lake Union were also reviewed.</p> <p>Based on this analysis, and in coordination with WSDOT Aviation, a revised flight path was identified (see Section 3.2 of this Final EIS). This revised flight path differs from that shown in the Draft EIS in that portions are narrower than the previous flight path, the curvature is more gradual, and the east-west legs of the flight path have shifted slightly to the north. Specifically, the southern boundary has shifted 400-500 feet north so that the southern boundary lies north of Valley Street and is generally aligned with Broad Street. The southern boundary now crosses Aurora Avenue North at about Mercer Street. Similarly, the northern boundary of the flight path shifted 200-300 feet north, crossing the Lake Union shoreline at roughly Highland Drive and crossing Aurora Avenue just north of Ward Street. Please see Section 3.4 (Aesthetics) for revised images associated with the revised flight path.</p> <p>An additional mitigation measure has been recommended in this EIS – that a project-level analysis of wind impacts be required for all new development above the base height permitted under the Seattle Mixed zoning.</p>
4	<p><b>Housing Data.</b> Please see the revised inventory of affordable housing in Final EIS Section 3.6.</p>
5	<p><b>Incentive Zoning.</b> The comment is acknowledged.</p>
6	<p><b>Additional Development Considerations.</b> The comment is acknowledged. Additional zoning standards will be considered by the City in its future decision on the preferred zoning approach in South Lake Union.</p>
7	<p><b>Conclusion.</b> The comments are acknowledged.</p>

## Comment Letters 90-124

90.	Heffron, Marnie
91.	Hennings, Gloria
92.	Herb, Frederick and Margaret
93.	Hill, G. Richard
94.	Holberg, Hillary
95.	Holmes, Robert J.
96.	Howe, Douglas, and Hurd, A-P
97.	Hoy, Mary
98.	Huard, Brock
99.	Huberty, Dan
100.	Hughes, Brendan
101.	Hurd, A-P
102.	Ito, Doug
103.	Johnson, Annalisa
104.	Johnson, Jay
105.	Kaivola, Linda
106.	Kaylor, Courtney A.
107.	Kelly, James
108.	Kenny, Daniel
109.	Kenny, Dennis E.
110.	Kenny, Diane
111.	Kent, Mike
112.	Kinzer, Craig and Richey, Kris
113.	Kitto, Terri
114.	Kleinart, Jack
115.	Kleinart, Layne
116.	Koshy, Ben
117.	Kroll, Jeff
118.	Kushmerick, Martin
119.	Kushmerick, Patricia
120.	Langrand, Sylvain
121.	Larsen, Brian R.W.
122.	Lawless, Betsy
123.	Leabo, Dick A.
124.	Leland, Larry



April 11, 2011

Seattle Department of Planning and Development  
Attn: James Holmes  
700 Fifth Avenue, Suite 1900  
P.O. Box 34019  
Seattle, WA 98124-4019

E-mail: southlakeunioneis@seattle.gov

**Subject: South Lake Union Height and Density Alternatives Draft EIS  
Comments about Transportation Analysis**

Dear Jim,

Heffron Transportation has reviewed the Draft EIS for the South Lake Union Height and Density Alternatives, and presents these comments for your consideration. Foremost among these is the request to incorporate recommendations from the recently completed *South Lake Union/Uptown Triangle Mobility Plan* into the EIS's mitigation measures (attached). This plan was sponsored by four community organizations: the South Lake Union Community Council, South Lake Union Chamber of Commerce, Uptown Alliance, and the Queen Anne Chamber of Commerce. It also was coordinated with various public agencies including DPD, SDOT, WSDOT and King County Metro. We also have other comments related to the transportation analysis presented in the EIS. All of our comments are attached. | 1

If you need further information related to the Mobility Plan recommendation, please call me at (206) 523-3939.

Sincerely,  
Heffron Transportation, Inc.

A handwritten signature in blue ink, appearing to read "Marni C. Heffron", is written over a horizontal line.

Marni C. Heffron, P.E., P.T.O.E.  
President

MCH/mch

Attachments

## South Lake Union/Uptown Triangle Mobility Plan

1. **The Mitigation Strategies should incorporate recommendations from the recent *South Lake Union/Uptown Triangle Mobility Plan*, which defines the transportation priorities for the South Lake Union Community Council and South Lake Union Chamber of Commerce.**

2

Almost all of the mitigation measures shown in Figure 3.13-23 are captured in the Mobility Plan. Key improvements in the Mobility Plan that are not listed include:

- Creating an enhanced transit station on Aurora Avenue N between Thomas Street and Harrison Street (once the North Portal is complete).
- Providing east-west transit service on Harrison Street connecting Uptown and Capitol Hill through the heart of South Lake Union. This could be a new or relocated route.
- Routing select existing downtown-bound transit service that uses Interstate 5 to the Mercer Street ramps and Fairview Avenue.
- Developing a Streetscape Concept Plan for Dexter Avenue south of Valley Street.
- Implement a comprehensive pedestrian wayfinding program using the already-adopted City Wayfinding System standards.
- Improve pedestrian-level lighting throughout the neighborhood.

A copy of the plan is attached for reference.

## Comments on the EIS Transportation Analysis

2. **The “Threshold of Significance” used to define a Significant Impact on a roadway is lower than has been traditionally applied in Seattle. Given that the City of Seattle’s only adopted level of service standards are in its Concurrency Policy, those thresholds should be used to define significant roadway impacts.**

3

Section 3.14.4 of the EIS defines the thresholds for environmental impact. It states,

*A significant transportation impact is said to occur if any of the proposed alternatives would: a) cause an increase in traffic demand that results in a study corridor, that operates acceptably under the 2031 No Action Alternative to operate unacceptably (d/c ratio of 0.90, which equates to LOS E or F conditions) or b) Cause an increase in traffic on a study corridor that operates unacceptably (as measured by d/c ratios and LOS) under the 2031 No Action scenario that results in the d/c ratio increase by at least 0.01 (increases in d/c ratios of less than 0.1 are no noticeable by drivers.)*

Appendix E goes on to explain that a 0.01 increase in d/c [demand-to-capacity ratio] could relate to an increase in delay at the Mercer Street/Fairview Avenue N intersection of about 3.8 seconds per vehicle. However, this level of delay would not typically be considered a “significant impact” by City of Seattle staff. Although the City has no written level of service standards for individual intersections, City staff typically considers a significant impact to be those intersections that would experience an increase of 5 or more seconds of delay per vehicle.

3 cont

Furthermore, for the *Mercer Corridor Improvement Project NEPA Environmental Impact Statement* (City of Seattle, December 2008), even higher levels of delay were reported to not be significant impacts. In that document, detailed traffic analysis was performed to report both level of service impacts as well as travel time impacts of the Mercer Street widening project and conversion to a two-way street. The proposed Mercer project was reported to increase PM peak hour travel times in the eastbound direction by about 28%. (Travel time from Seattle Center to Interstate 5 was predicted to increase from 7.3 minutes to 10.2 minutes.) However, the text reported, “The slightly longer 2010 PM peak-hour travel times are not considered significant in the context of overall travel times for traffic using this corridor.”

The City’s only written policy related to level of service is the Concurrency policy of the Seattle Comprehensive Plan. Although the policy reflects screenlines across several arterials, and not individual roadway segments, the methodology of applying a volume-to-capacity (v/c) ratio is similar to the d/c method applied for the South Lake Union Draft EIS. The Concurrency policy, however, establishes an acceptable v/c limit of 1.20 for all of the urban area screenlines. The South Lake Union Draft EIS applied a 1.0 threshold to define a significant impact to a roadway, below the adopted standard.

Based on the above information, the thresholds of significance applied to the South Lake Union Draft EIS are too low. It has no precedent in application for individual projects, nor is it within limits previously accepted for corridors in this neighborhood. Therefore, the City’s adopted level of service standard in its Concurrency policy—with a v/c threshold of 1.20—should be applied to determine if any of the alternatives would create a significant impact. In addition, a 0.01 increase in d/c is also too low. A 3% to 5% increase may be more appropriate. Using a threshold that is too low could result in the identification of mitigation for vehicular traffic that is unnecessary in this very urban environment.

**3. Include the widening Mercer Street under Aurora Avenue N to six lanes plus turn lanes as a “Reasonably Foreseeable Transportation Improvement.”**

4

This portion of the West Mercer Project is a part of the City-State agreement for the Alaskan Way Viaduct Replacement Project (AWV), and was included as a committed project in all analysis for the AWV Replacement Project Supplemental Draft EIS (October 2010). It also has substantial funding commitments that were approved as part of the City’s recent commercial parking tax as well as other sources. The project’s needs and benefits were defined for the No Action Alternative, and it should not be treated as a “mitigation” project for the rezone alternatives.

**4. Integrate program elements identified in the Seattle Department of Transportation's Report to the City Council on the South Lake Union Transportation Demand Management Program (December 2005).**

5

This very detailed plan recommended many Transportation Demand Management (TDM) actions, including options for funding expanded transit service. Many of the elements suggested in the plan are similar to those recommended as Mitigation in the Draft EIS; however, it provided more detail related to implementation mechanisms.

**5. Apply a portion of the Incentive Zoning bonus to improve the transportation system.**

6

As noted on page 1-4 of the Draft EIS, Seattle Municipal Code Section 23.58A established conditions and process for development incentives. For buildings greater than 85 feet in height, at least 60% of the increased floor area would need to support provisions for affordable housing, and other City approved bonus options may be used for up to 40% of the increased floor area.

The City should consider tapping a portion of the 40% for "other approved bonuses" for area-wide transportation improvements that would encourage the use of non-automobile transportation. Projects that would be difficult to assess based on specific project impacts would be the best candidates for this type of funding source. It could include streetscape projects such as the Thomas Street Green Street, trails such as the Lake-to-Bay Loop Trail, improved pedestrian lighting, improved pedestrian wayfinding, and hillclimbs such as those proposed at John Street or in the north portion of the study area.

**6. Account for the extensive use of private shuttles.**

Eight existing businesses and institutions in South Lake Union operate private shuttles—some for commuting and others to connect facilities. The transit load analysis does not acknowledge this mode, which likely reduces the load on key public transit routes, particularly those that operate between the University District and South Lake Union.

7

Any mitigation program that is developed, whether as part of a revised Voluntary Impact Fee Program or as an incentive zoning program, should provide a mechanism to credit businesses that commit to ongoing private shuttle operations.

**7. Balance the parking supply with the mode of travel expectations.**

Table 3.13-15 of the EIS lists the assumed parking supply rates for three land uses. For non-retail/commercial uses, which would include office, the rate is listed as 1.0 space/ksf (1,000 square feet). This parking rate would reflect an auto use that is lower than assumed for the traffic analysis. The parking rates should be balanced with the traffic analysis.

8

According to the Institute of Transportation Engineers (ITE) *Parking Generation* (4<sup>th</sup> Edition, 2010), a typical suburban office building with little to no use of alternative modes of travel would, on average, generate a peak parking demand of 2.84 spaces/1,000 sf. Modeling performed for the EIS determined that about 50% of all peak hour trips would be made by automobile. If that mode of travel were applied to the typical suburban parking rate, then offices in South Lake Union would require an average of 1.42 parking spaces/1,000 sf.

However, the trip generation results from the model are not specific for each land use. It is likely that the office trips would have a slightly higher level of automobile use than the neighborhood's retail or residential uses since office would draw from a larger market area with longer trips that may be made by car. Therefore, the average parking rate could be higher, in the range of 1.5 to 1.6 spaces/1,000 sf. Analysis should be performed to balance the parking needs with the mode of travel assumptions to reduce the potential impact to on-street and short-term parking needs in the neighborhood. If a maximum parking rate is selected it should be set above the average rates to reduce adverse impacts associated with parking overspill.

8 cont

For individual projects, the amount of parking provided should also be balanced with the goals of each project's Transportation Management Plan. The City can incentivize reducing the parking supply within a project through its Traffic Impact Fee.

8. **Increase capacity used to evaluate Denny Way.** The capacity for Denny Way between Aurora Avenue and Stewart Street has been calculated assuming "1.5 through lanes." However, left turn movements are prohibited at most locations along this corridor where there is no auxiliary turn lane. Therefore, the capacity of this corridor has likely been underestimated. The total capacity values should be reviewed for this corridor based on Synchro models that the City has created for this corridor and/or the downtown core area.

9

9. **Include new King County Metro Route 309.** The existing and future transit analysis does not reflect the newly-implemented Route 309 from Kenmore to First Hill. This peak period route, which King County Metro started in February 2011, exits Interstate 5 at the Mercer Street ramps and uses Fairview Avenue/Boren Avenue to reach Harborview Medical Center.

10

10. **Revise discussion and analysis of the Urban Village Transportation Network (UVTN).** Text and tables on page 3.13-62-63 describe the City's UVTN. It states that "eight transit lines do not meet the UVTN frequency goal of 15-minute headways during the AM peak hour." However, the City's UVTN policies are not related to individual transit routes, but rather to corridors where high frequency transit service is desired. Those corridors could be used by more than one route. In the South Lake Union study area, the City has designated the following UVTN Corridors:

11

- UVTN ID #1: Fairview/Stewart/Virginia - Stewart Street to the University District
- UVTN ID #17.1: Aurora Avenue - Denny Way to N 45<sup>th</sup> Street
- UVTN ID #49: 5<sup>th</sup> Avenue N/Taylor Avenue N – Denny/5<sup>th</sup> Avenue to Queen Anne Ave
- UVTN ID #50: Dexter Avenue - Denny Way to Westlake Avenue
- UVTN ID #55: Denny Way – Western Avenue to Olive Way
- UVTN ID #61: South Lake Union Streetcar
- UVTN ID #69.1: W Mercer Place/Mercer Street – Elliott Avenue W to Westlake Avenue N
- UVTN ID #69.2: Mercer Street/ Lakeview Blvd E – Westlake Avenue N to Broadway.

The City monitors these corridors not just for headways, but also the hours of service, travel speed, reliability, and overloading. Past monitoring of these criteria is available from SDOT. Any assessment about how the proposed alternatives affect the UVTN should be based on these defined criteria.

**11. Don't require implementation of a mid-block connector, but review them as part of the Design Review process.**

12

The list of potential pedestrian and bicycle improvements on Page 3.13-82 includes "Require that projects which develop above the "base height" implement the mid-block connector concept consistent with the South Lake Union Urban Design Framework." However, universal application of this is not recommended since it could result in adverse transportation impact instead of functioning as a mitigation measure. Currently, the mid-block connectors are evaluated through the Design Review process, and that process should continue. Each site's context and location can then be considered. Design guidance could be provided to the review boards to evaluate the benefits and impacts of potential mid-block connectors. For example:

- Mid-block connectors should be reviewed in the context of major arterials since it may not be desirable to have a mid-block connectors intersect a high-volume vehicle route where no crossing could be provided.
- Mid-block connectors should be reviewed in relationship to a project's truck loading and service needs since a through pedestrian connection may compete with those functions.
- Mid-block connectors should consider proximity to major transit stops and stations since it might be preferable to increase plaza areas near transit stations along the edge of a site instead of in the middle of it.

**12. Provide background data for use in subsequent SEPA analyses for individual projects.**

13

The data and analysis that are currently presented in the EIS's Transportation section would not support future SEPA analysis that may be required for individual development permits. The following lists data that would be useful to have in an Appendix or on file at DPD to support future analyses:

- **Trip generation rates for various uses.** The trip generation results, which were modeled for this neighborhood and its specific features, were presented as a single value. In order to replicate these results for an individual project, it would be useful to have estimated trip rates for at least the three primary land uses (office, retail, and residential). Rates both without and with mitigation should be provided to assess the effect of transportation management strategies.
- **Traffic volume plots for Existing, No Action, and Build Conditions.** Traffic analyses for individual development projects will continue to rely on adjusting existing counts to reflect future roadway enhancements. For many years, data from the Mercer Corridor EIS were used for this type of analysis. The new travel demand modeling performed for this EIS would provide an updated basis for adjusting existing traffic volumes and should be available through DPD or SDOT.
- **Trip distribution pattern by land use.** Figure 3.13-18 shows the external vehicle trip distribution pattern for all trips. Having this pattern segmented by the three major land use types (office, retail, and residential) would be useful for application to future traffic analysis.

**SOUTH LAKE UNION / UPTOWN TRIANGLE**

DRAFT APRIL 8, 2011



DRAFT

April 8, 2011

Dear City of Seattle and King County leaders:

We are proud to present and endorse the South Lake Union/Uptown Triangle Mobility Plan recommendations that will enhance walking, biking and using transit in these two Urban Centers. These transportation improvement recommendations are the result of many hours of participation by the South Lake Union Community Council, Uptown Alliance, South Lake Union Chamber of Commerce, and the Greater Queen Anne Chamber of Commerce.

The recommendations have been grouped into 7 key mobility themes:

- Connecting Communities
- Increased Transit Service
- Serve Regional Access & Mobility
- Encourage Walking
- Support Biking
- Leverage Private Transportation Investments
- Create Hubs for Mode Transfers

We would like to give special thanks to the Mayor's Office, Seattle City Council, King County Metro, Washington State Department of Transportation and Seattle Department of Transportation.

We look forward to partnering with our leaders and public agencies to recognize and implement the Mobility Plan recommendations.

Sincerely,

Jerry Dinndorf  
South Lake Union Community Council

Damien King  
South Lake Union Chamber of Commerce

John Coney  
Uptown Alliance

Mary Chapman  
Greater Queen Anne Chamber of Commerce

### Working Committee Members

#### South Lake Union Community Council

Steven Paget  
Robbie Phillips  
Joshua Franklin  
Michael McQuade  
Jerry Dinndorf  
John Savo  
Bob Grossman

#### South Lake Union Chamber of Commerce

Monty Holmes  
Matt Curry  
Damien King  
Lisa Verhovek  
Fred Kiga

#### Queen Anne Chamber of Commerce

Mary Chapman  
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#### Queen Anne Uptown Alliance

John Coney  
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Marty Kaplan

#### Seattle Department of Transportation

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#### King County Metro

Jim Jacobsen  
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#### Consultant Team

Heffron Transportation, Inc.  
VIA Architecture  
Nelson Nygaard  
Cascade Bicycle Club

# EXECUTIVE SUMMARY

The South Lake Union and Uptown neighborhoods will undergo a massive transformation in the next decade as the neighborhoods grow to accommodate more than 12,000 new residents and 24,000 new jobs.

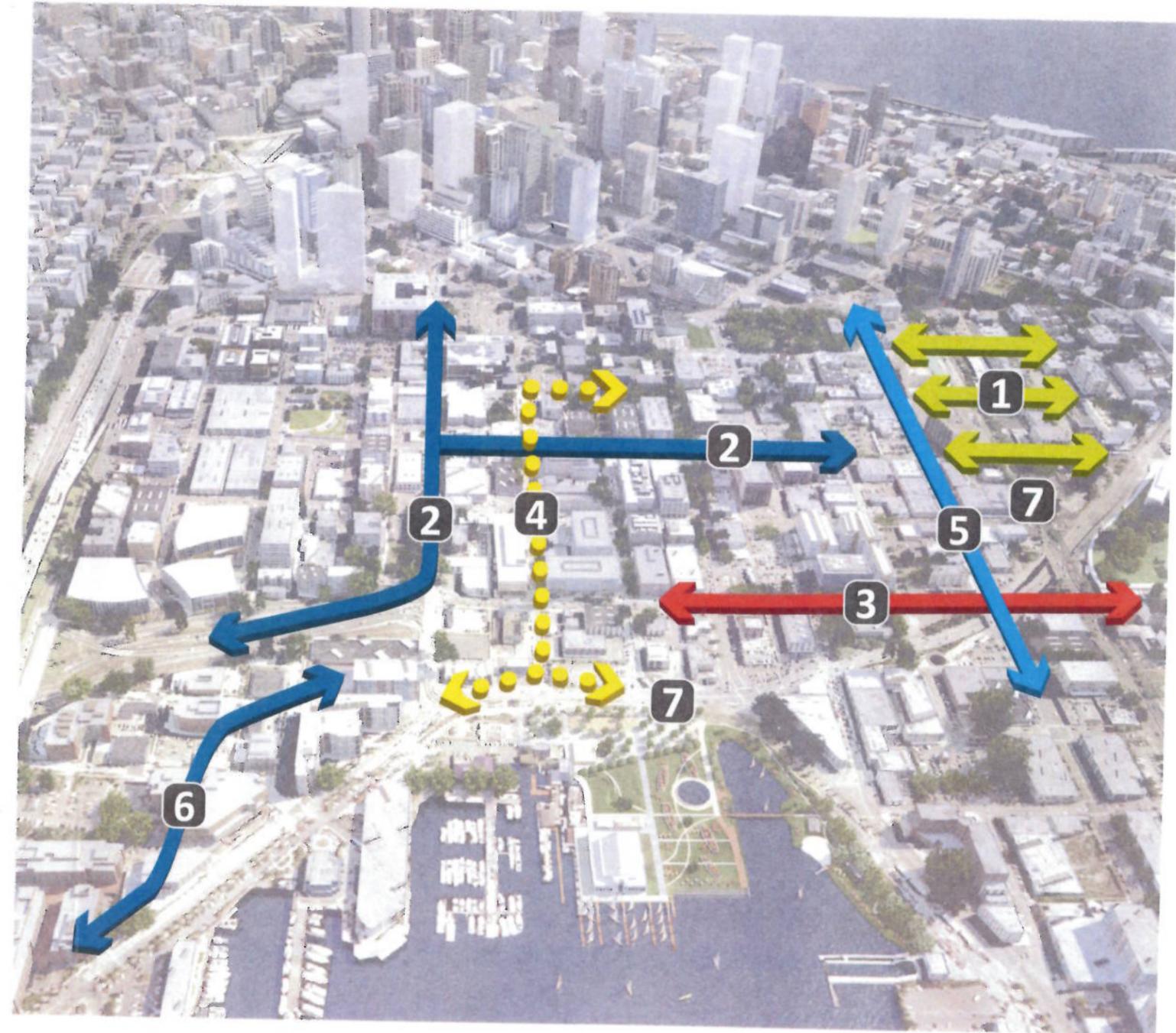
In addition, three major infrastructure projects—the Alaskan Way Viaduct Replacement Project, the Mercer East Project, and the Mercer West Project—will change travel patterns in the area and provide key links between the two neighborhoods for pedestrians, bicycles, and transit.

There have been many independent planning studies performed in the two neighborhoods. This plan seeks to consolidate all of the prior planning efforts and adapt them to account for the major infrastructure projects.

This plan was created with substantial input from neighborhood interest groups, businesses, and various agencies. A detailed analysis and user survey was also performed by the Cascade Bicycle Club as part of this project. All plan recommendations have been vetted through the plan's advisory committee.

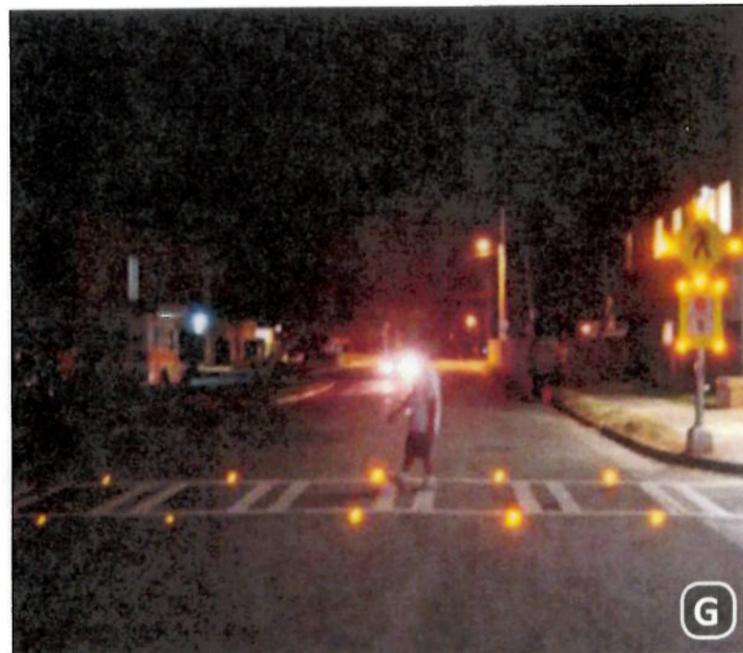
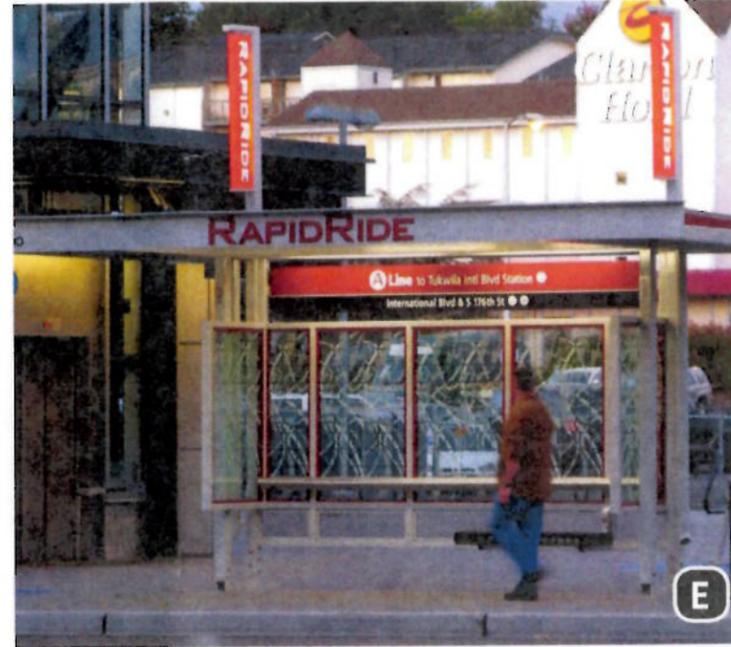
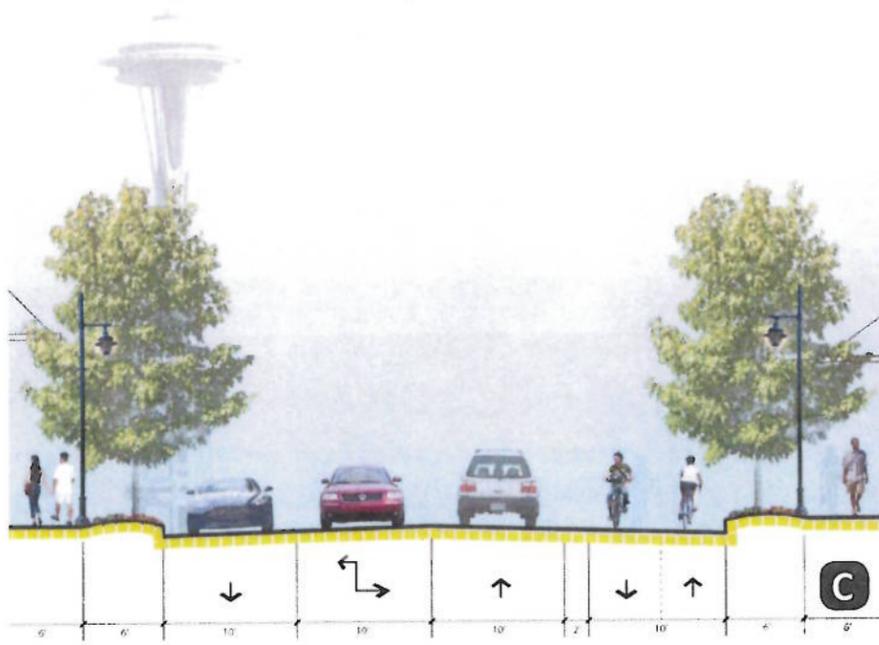
The mobility plan recommendations have been grouped into seven key themes. These themes are further described in subsequent sections below and detailed in the matrix at the end of this plan (pages 18-21):

- 1 **Connect Communities:** Connect South Lake Union, Uptown Triangle, Seattle Center and Uptown by re-establishing the east-west grid across Aurora Avenue at John, Thomas and Harrison Streets with attractive and safe "complete street" designs.
- 2 **Increase Transit Service:** Increase transit service to and through the Urban Centers with rerouted and extended bus routes.
- 3 **Serve Regional Access & Mobility:** Realize all regional and mobility improvements of the Mercer Corridor and North Portal projects for pedestrians, bicycles transit, freight and cars.
- 4 **Encourage Walking:** Create an active and safe pedestrian environment with green streets, active sidewalks, regional trail connections, and clear wayfinding.
- 5 **Support Biking:** Provide a safe, clear and convenient network of bike paths, bike lanes, and bicycle support facilities.
- 6 **Leverage Private Transportation Investments:** Partner with private businesses, institutions, and developers to leverage privately funded operational measures such as private shuttles, transit partnerships with King County Metro, and transportation management plans, as well as infrastructure investments in the street frontage, utility upgrades, and street enhancements.
- 7 **Create Hubs for Mode Transfers:** Create neighborhood transportation hubs—at the Aurora Avenue RapidRide Station and on Valley Street near Lake Union Park—that facilitate transfers between modes of transportation.



# 1

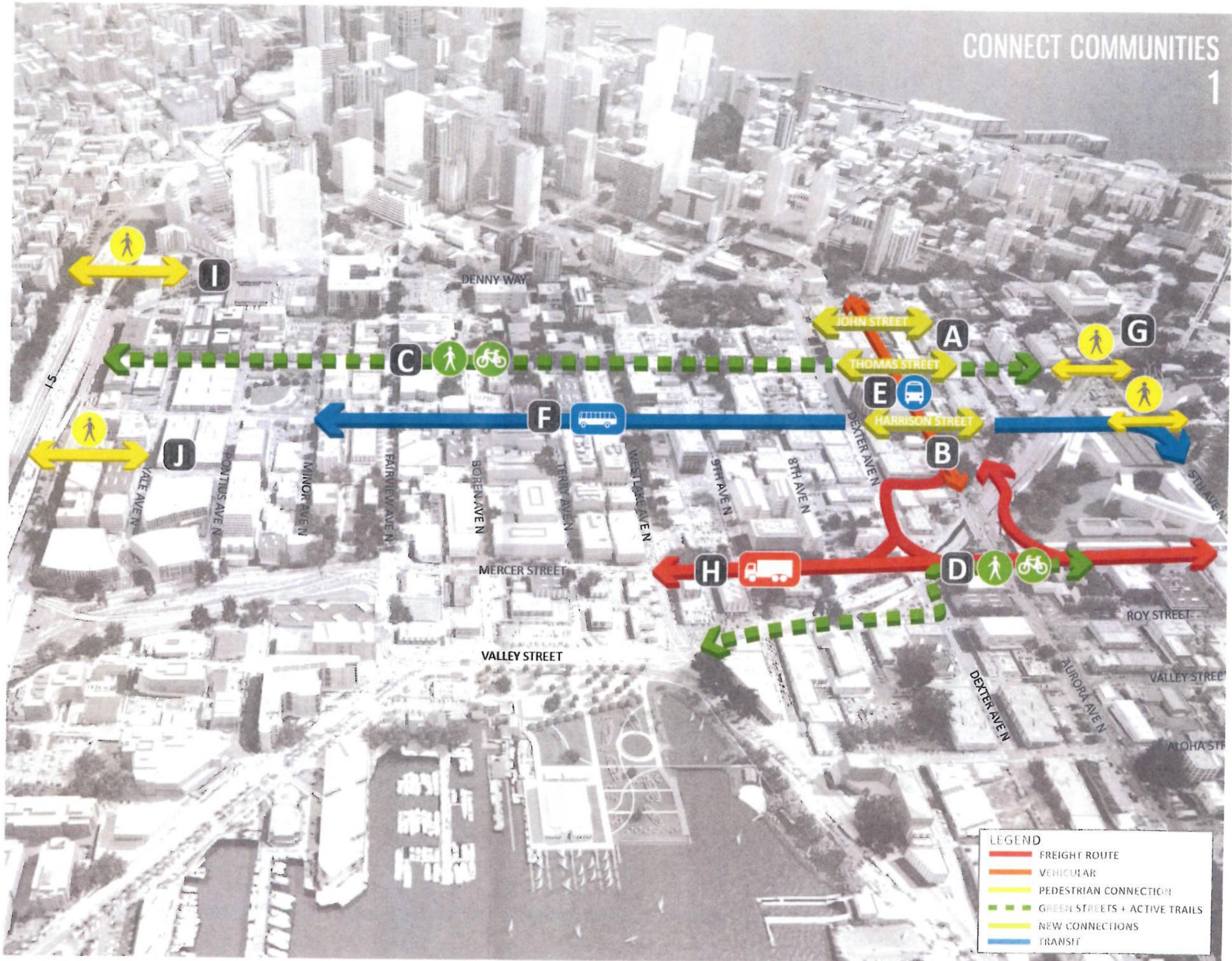
## CONNECT COMMUNITIES



Connecting South Lake Union and Uptown across Aurora Avenue is these neighborhoods' top priority. The North Portal of the Alaskan Way Viaduct Replacement project tunnel will be north of Harrison Street, three blocks north of where the Battery Street Tunnel daylights today. This will remove a substantial volume of through traffic from Aurora Avenue N between Harrison Street and Denny Way and allow three existing streets—John Street, Thomas Street, and Harrison Street—to be reconnected across Aurora Avenue N.

These reconnected streets provide new opportunities for east-west transit service, pedestrian connections, and bicycle connections that are not possible today. In addition, the Mercer West project proposes to widen Mercer Street under Aurora Avenue including new facilities for bicycle and pedestrians.

- A** Re-establish the east-west grid across Aurora Avenue at John, Thomas and Harrison Streets with attractive and safe "complete street" designs.
- B** Rename Aurora Avenue N between Harrison and Denny Way to its historic name: 7<sup>th</sup> Avenue N.
- C** Provide pedestrian and bicycle facilities on Thomas Street consistent with the City's Street Concept Plan and Green Street designation. Thomas Street is part of the Lake-to-Bay Loop.
- D** Provide a pedestrian/bicycle trail under Aurora Avenue N on Mercer Street
- E** Create a RapidRide Station on surface Aurora Avenue N (to be renamed 7<sup>th</sup> Avenue N) between Harrison and Thomas Streets as well as new transit stops on Harrison Street to ease transfers between local and regional bus service.
- F** Design Harrison Street to accommodate future east-west bus service with stops at 7<sup>th</sup> Avenue N.
- G** Enhance the pedestrian crossings of 5<sup>th</sup> Avenue N at Thomas Street and Harrison Street with curb bulbs, special pavement, and pedestrian signal improvements.
- H** Provide turning radii for large trucks at key locations where trucks will access Mercer Street and the SR 99 ramps including Mercer Street/5<sup>th</sup> Avenue (southeast corner), Mercer Street/6<sup>th</sup> Avenue (southwest corner), and on the Republic Street off-ramp from northbound SR 99.
- I** Widen the Denny Way overpass of I-5 to provide bicycle lanes and a sidewalk on the north side of the overpass
- J** Evaluate other pedestrian connection opportunities between STU + Capitol Hill north of Denny Way, including improved stairs, trails, and/or a new pedestrian overpass of I-5.

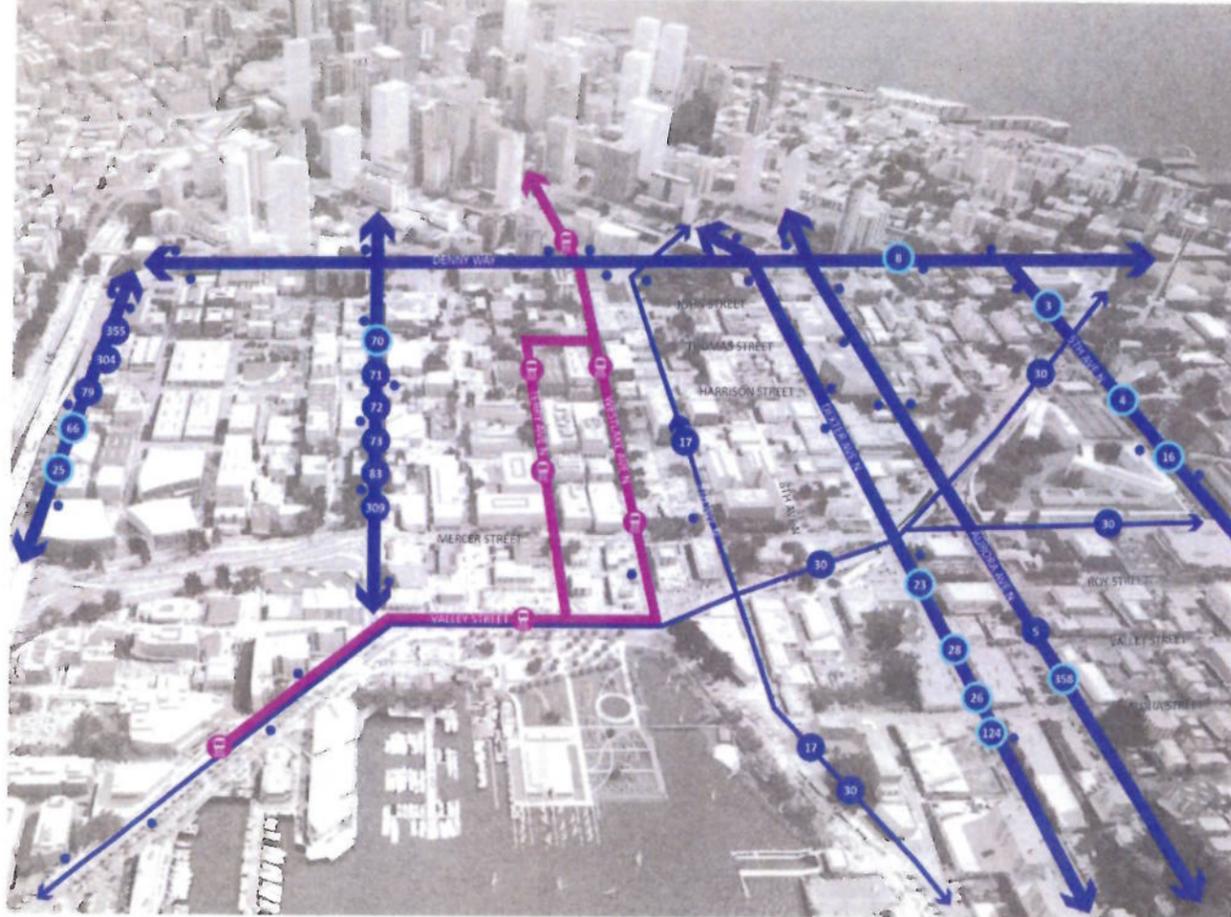


LEGEND	
<span style="color: red;">—</span>	FREIGHT ROUTE
<span style="color: orange;">—</span>	VEHICULAR
<span style="color: yellow;">—</span>	PEDESTRIAN CONNECTION
<span style="color: green;">- - -</span>	GREEN STREETS + ACTIVE TRAILS
<span style="color: lightgreen;">—</span>	NEW CONNECTIONS
<span style="color: blue;">—</span>	TRANSIT

# 2

## IMPROVE TRANSIT SERVICE

### EXISTING TRANSIT SERVICE



Existing transit service runs primarily north - south and at the edge of the neighborhoods

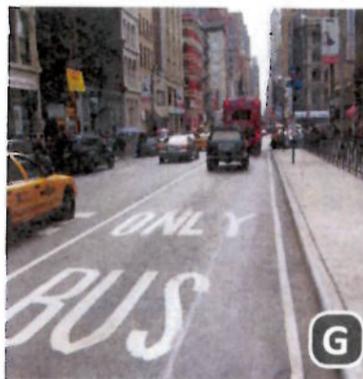
-  TRANSIT
-  STREETCAR
-  309 BUS ROUTE
-  17 "FREQUENT SERVICE" ROUTE
-  STREETCAR STOP
-  BUS STOP



J



F



G



H

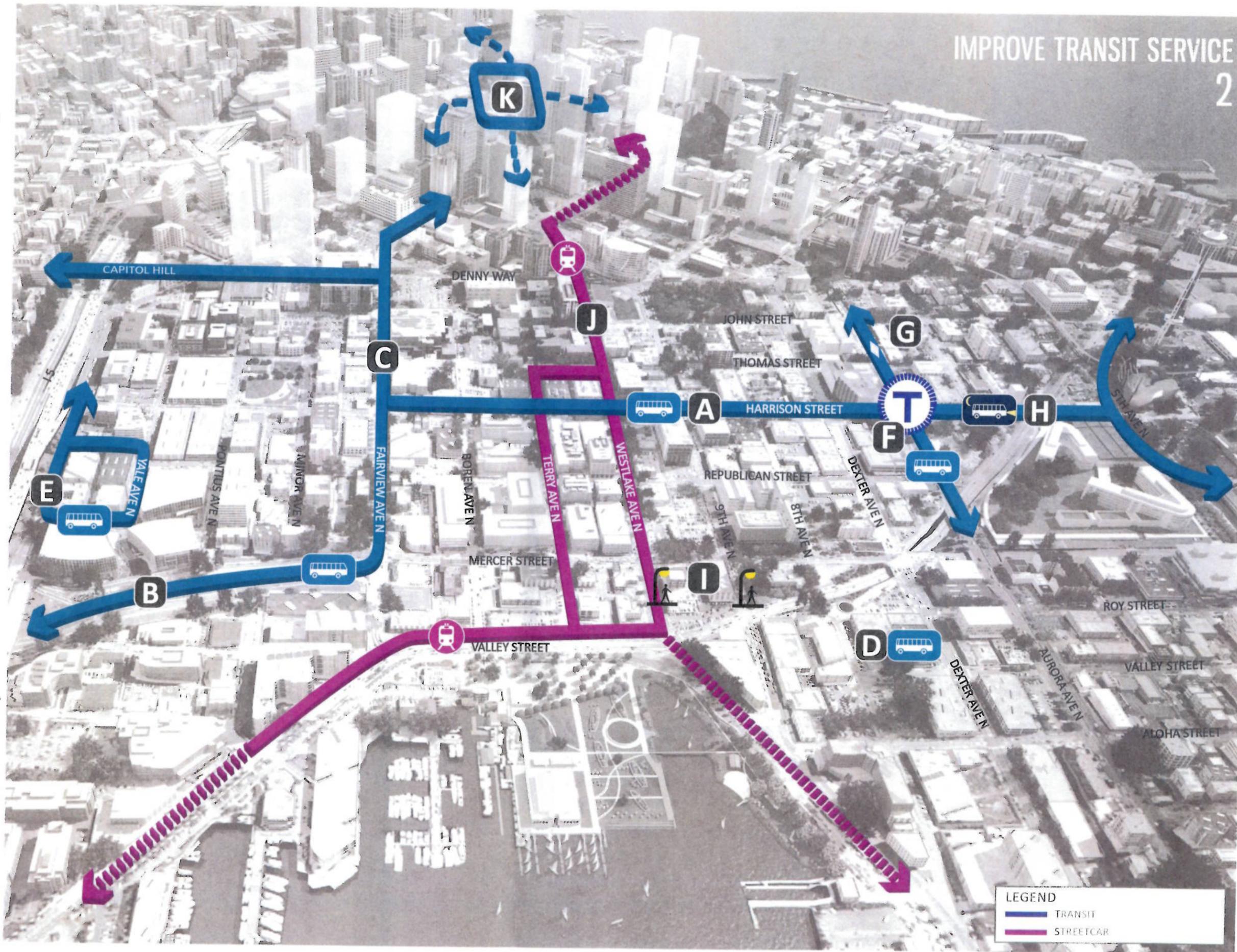
South Lake Union and Queen Anne Uptown are two of the fastest growing neighborhoods in the Pacific Northwest. Accommodating that growth demands a paradigm shift in how people travel—shifting from autos to foot, bike, and transit.

In its recent Seattle Transit Communities report, the Seattle Planning Commission identified both the South Lake Union and Uptown neighborhoods as two of 14 "transit communities with the most urgent near-term planning needs."

As South Lake Union grows, it will become a major transit destination. Transit service should adapt to treat the neighborhood as an extension of the downtown core rather than a separate neighborhood, and reduce the number of riders who must transfer to reach South Lake Union. However, in these tough economic times, it is unrealistic to expect that transit agencies could create new routes or make substantial changes in its operations. Therefore, this plan recommends several low-cost strategies to increase service to the neighborhood.

When funding is available, future opportunities to enhance transit service and integrate transit improvements could be made.

- A** Provide east-west transit service connecting Uptown and Capitol Hill through the heart of South Lake Union on Harrison Street.
- B** Increase transit service through South Lake Union by rerouting select I-5-to-Downtown routes to the Mercer Street ramps and Fairview Avenue N.
- C** Improve transit reliability and operating conditions on Fairview Avenue N to entice more transit to route through the South Lake Union neighborhood.
- D** Identify acceptable bus layover locations in the two urban centers in exchange for extending bus routes to these neighborhoods.
- E** Work with Sound Transit to have buses that now layover in the SLU neighborhood to make stops in the neighborhood as part of their route.
- F** Concentrate transit service near the future RapidRide Station on Aurora Ave N (to be renamed 7th Ave N), between Harrison and Thomas Streets.
- G** Add transit lanes on 7th Avenue N that connect to the Wall Street/Battery Street transit lanes.
- H** Increase nighttime and weekend service to better serve events at the Seattle Center and Lake Union Park, as well as the growing resident population in South Lake Union and Uptown Triangle.
- I** Improve pedestrian lighting and amenities at and approaching transit stops and stations.
- J** Support additional Streetcar routes. The highest priority would be to connect the First Hill Streetcar line to South Lake Union and the Seattle Center.
- K** Improve ability to use transit to circulate among the downtown neighborhoods.



LEGEND	
<span style="color: blue;">—</span>	TRANSIT
<span style="color: purple;">—</span>	STREETCAR

# 3

## SERVE REGIONAL ACCESS + MOBILITY

### PROPOSED STREET CLASSIFICATIONS



with Mercer East and Alaskan Way Viaduct Replacement Project

- MAJOR TRUCK STREETS
- PRINCIPAL ARTERIALS
- MINOR AND COLLECTOR ARTERIALS



In 2006, the Mercer Corridor Stakeholder Committee presented a package of 28 recommendations to the City of Seattle. Foremost among these was that the City establish a two-way Mercer Street corridor from I-5 to Elliott Avenue, and reconnect the east-west street grid across Aurora Avenue N, which is the key to making the entire system work.

Most of the original recommendations are now under construction as part of the Mercer East project which includes Mercer and Valley Streets east of Dexter Avenue N. The second part of this corridor project, Mercer West, is now in design and would complete the corridor between Dexter Avenue N and Elliott Avenue W. As of February 2011, all of the key elements from the original recommendation are being incorporated into either the Mercer West project or the North Portal of the Alaskan Way Viaduct Replacement project.

Some additional measures should be considered to focus regional and neighborhood through traffic to the Mercer Corridor and to manage traffic during construction.

SERVE REGIONAL ACCESS + MOBILITY

**A** Complete the Mercer West project, which would widen Mercer Street under Aurora Avenue to three lanes in each direction plus turn lanes, and convert Mercer Street west of 5th Avenue N to two way operations.

**B** Convert Roy Street west of 5th Avenue N to two-way operations and add bike lanes. Calm traffic and discourage through traffic on Roy Street.

**C** Improve pedestrian crossings at intersections along Mercer and Roy Streets, and consider special treatments, such as stamped and colored pavement at key intersections in the heart of Uptown (Roy and Mercer Streets at 1st Avenue N and Queen Avenue N) and at the Mercer Street/5th Avenue N intersection.

**D** Discourage through traffic from using Republican Street between Dexter Avenue N and Fairview Avenue N. Use signage, signal timing, and other traffic calming measures to direct through traffic to Mercer Street.

**E** Provide turning radii for large trucks at key locations where trucks will access Mercer Street and the SR 99 ramps including Mercer Street/5th Avenue (southeast corner), Mercer Street/6th Avenue (southwest corner), and on the Republic Street off-ramp from northbound SR 99.

**F** Provide signage for the future route from westbound Mercer Street to southbound SR 99 that would loop in a clockwise direction from Mercer Street to Taylor Avenue N to Valley Street and SR 99.

**G** Continue to engage community in planning for construction of the major infrastructure projects.



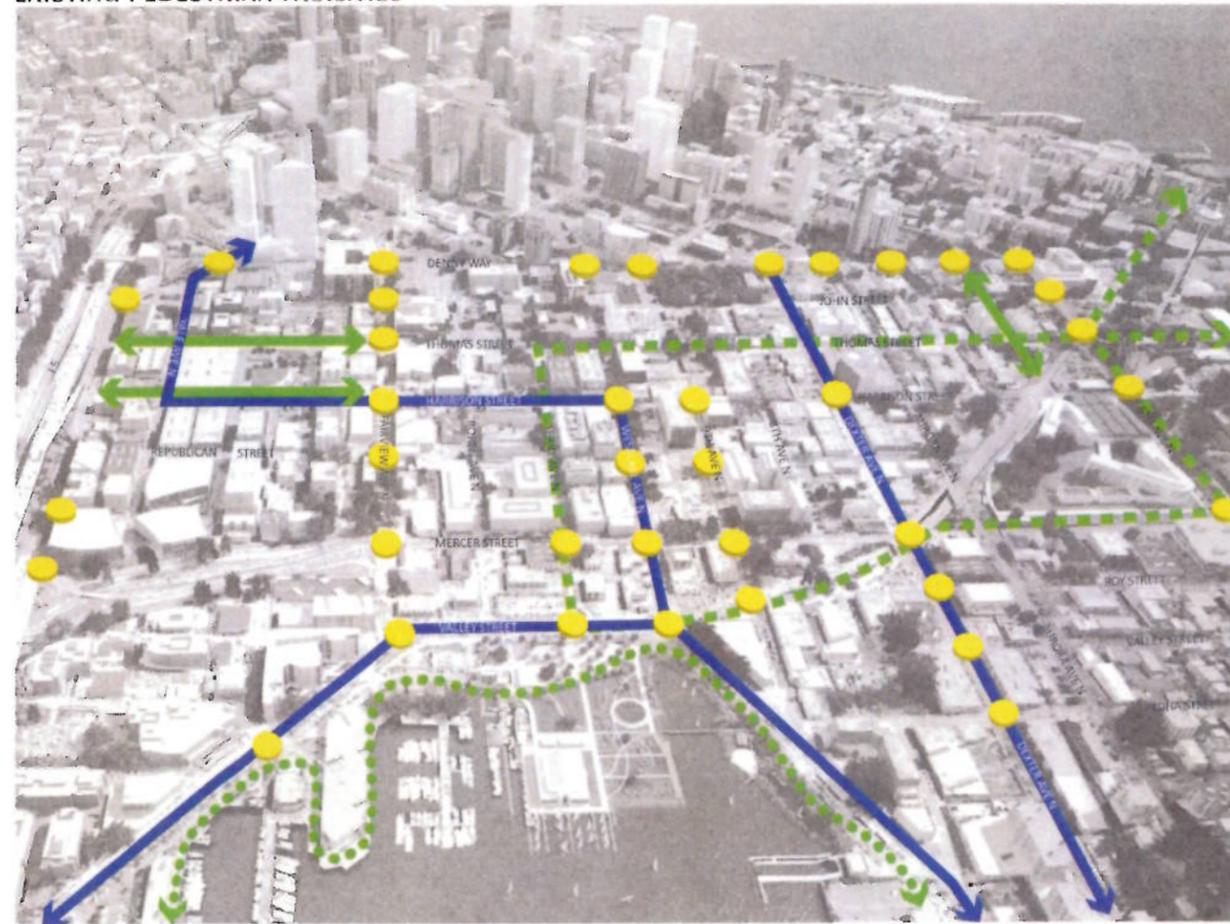
**LEGEND**

- FREIGHT ROUTE
- VEHICULAR
- PEDESTRIAN CONNECTION

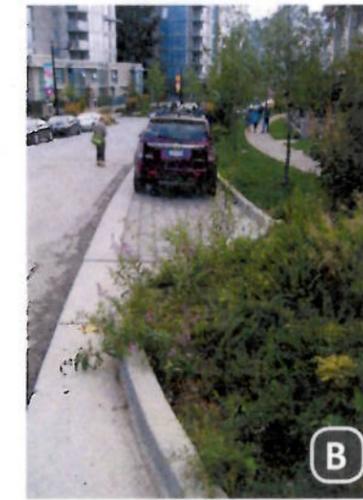
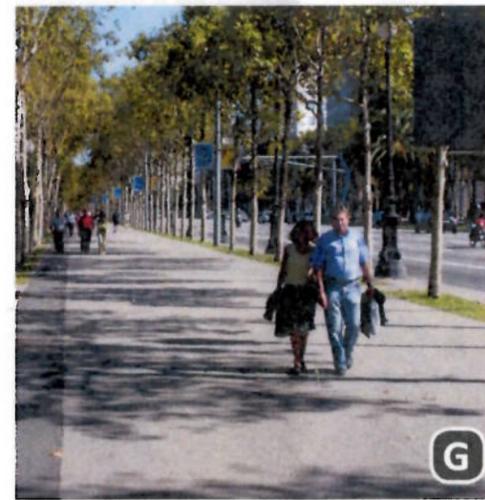
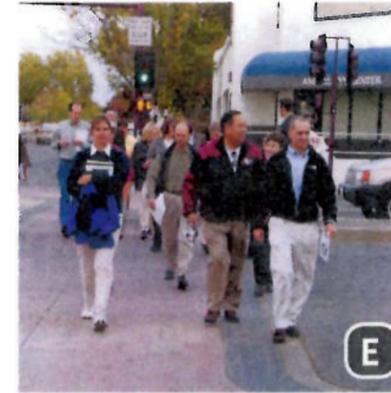
# 4

## ENCOURAGE WALKING

### EXISTING PEDESTRIAN FACILITIES



- RECREATIONAL WALKING ROUTE FROM SEATTLE WALKING MAP
- GREEN STREETS
- - - LAKE-TO-BAY LOOP
- . . . CHESHIAHUD LOOP TRAIL
- SIGNALIZED INTERSECTION

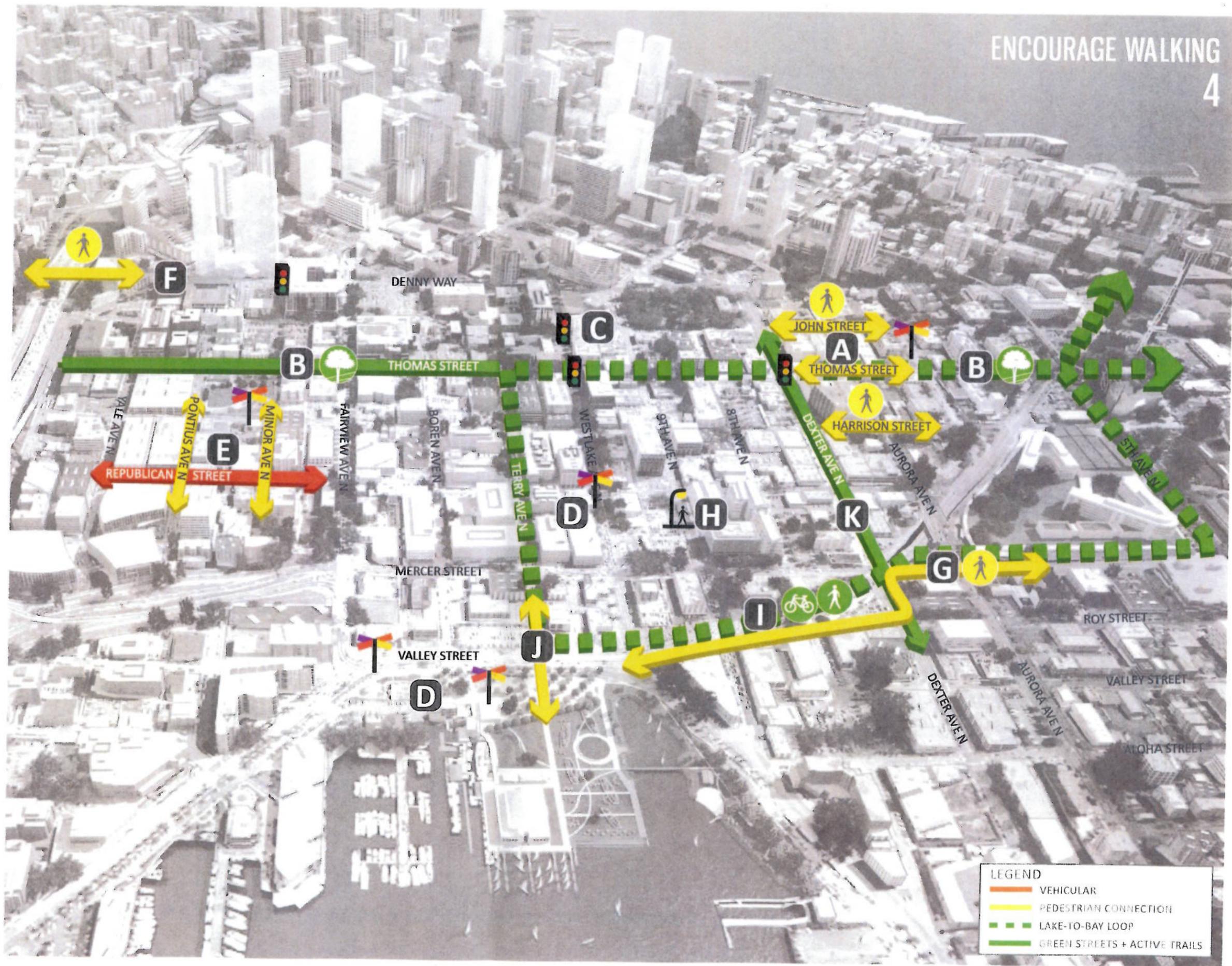


The pedestrian experience in and between neighborhoods **must** be enhanced for these neighborhoods to grow sustainably. The existing pedestrian connection between Uptown and South Lake Union is limited to the very narrow sidewalks along Mercer and Broad Street.

Many have said they now drive between these two neighborhoods because the walk is so forbidding. Poor lighting, unsignalized intersections, narrow sidewalks, and lack of wayfinding are other barriers to pedestrian travel.

All of the major infrastructure projects include pedestrian enhancements such as wider sidewalks and improved crossings. Very wide sidewalks or paths are proposed along Valley Street, along Mercer Street under Aurora Avenue, and along Thomas Street.

- A** Reconnect Harrison, Thomas, and John Streets across Aurora Avenue N.
- B** Implement Green Street improvements along Thomas Street between Eastlake Ave and 5th Avenue N.
- C** Signalize pedestrian crossings of Westlake Avenue N, particularly at Thomas Street and John Street.
- D** Implement a comprehensive pedestrian wayfinding program using the already-adopted City Wayfinding System standards.
- E** Address vehicular circulation impacts on pedestrian mobility in the Cascade Neighborhood particularly across Republican Street.
- F** Implement pedestrian improvements in the Denny Way Streetscape Concept Plan, including widening the Denny Way Overpass of I-5 to include a sidewalk on the north side, providing a signalized pedestrian crossing of Denny Way at Minor Ave N, and improving crossings at key intersections.
- G** Improve pedestrian facilities along the Mercer Corridor with a wide multi-use trail under Aurora Avenue, improving crossings of Mercer Street near the Seattle Center, and calming traffic at the Roy Street/Queen Anne Avenue intersection.
- H** Improve pedestrian-level lighting throughout neighborhood with priority along routes to major transit facilities.
- I** Complete the Lake-to-Bay Loop trail.
- J** Enhance the Terry Avenue connection to Lake Union Park with enhanced pedestrian crossings of Mercer Street and Valley Street and pedestrian improvements along Terry Avenue north of Mercer Street.
- K** Prepare a Streetscape Concept Plan for Dexter Avenue N within South Lake Union.



# 5

## SUPPORT BIKING

### EXISTING BIKING FACILITIES



- PAVED REGIONAL PATH
- ON-STREET BIKE LANE
- SHARED ROADWAY



C



G



B



A



G



F

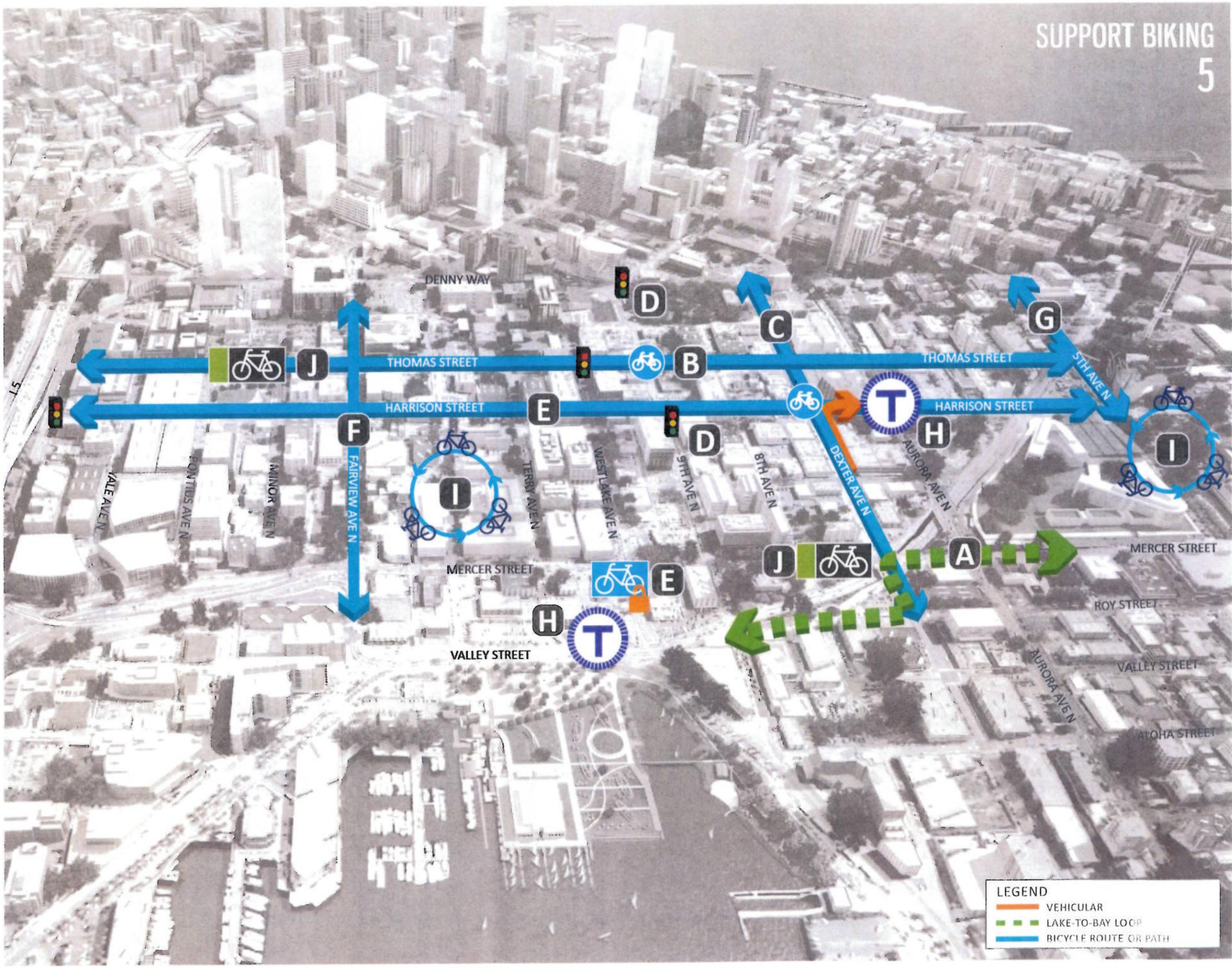


H

The relatively flat topography and robust grid system make the South Lake Union and Uptown neighborhoods bike friendly. The current barriers that exist for pedestrians—primarily the limited crossings of Aurora—also affect bicyclists.

Once those barriers are removed, the neighborhoods could also support programs such as bike sharing that link key attractions as well as businesses.

- A** Make bicycle improvements planned for the Mercer Corridor project including a wide multi-use path on Mercer Street under Aurora Avenue and bike lanes on Roy Street.
- B** Provide for bicycles on Thomas Street between 5th Avenue N and Eastlake Avenue E. Install signals at arterial crossings of Dexter Avenue N and Westlake Avenue N.
- C** Improve the Dexter Avenue N bike lanes between Roy Street and Denny Way with treatments similar to those now being implemented north of Roy Street. Provide a southbound right turn lane on Dexter Avenue N at Harrison Street to separate right turns from the bike lane. At the Mercer Street intersection, consider treatments such as bicycle boxes and signal phasing treatments to improve the transitions between Dexter Avenue N and the Mercer Street bike path.
- D** Improve bicyclist safety along 9th Avenue with signal changes at Denny Way and at Harrison Street.
- E** Provide for bicycles on Harrison Street between Fairview Avenue N and 5th Avenue N. Install a signal at Eastlake Avenue N.
- F** Provide for bikes on Fairview Avenue N, including intersection improvements at Denny Way, Valley Street and Mercer Street. Fairview Avenue N is also targeted for transit enhancements. If a Business Access and Transit (BAT) lane is located on Fairview Avenue N, it could be shared with bicyclists.
- G** Evaluate 5th Avenue N as a potential north-south bicycle connection between Belltown/Downtown and Uptown/Lower Queen Anne Avenue.
- H** Locate bike storage near major transit stations.
- I** Create a bike sharing program for Uptown, South Lake Union and Seattle Center. Work with City of Seattle and King County Metro to apply a framework and business model being developed for Seattle.
- J** Consider bike boxes and bike signals along key bike routes, including Roy Street west of Taylor Avenue, and Thomas Street between 5th Avenue N and Eastlake Avenue N, and Dexter Avenue N.



LEGEND	
	VEHICULAR
	LAKE-TO-BAY LOOP
	BICYCLE ROUTE OR PATH

# 6

## LEVERAGE PRIVATE TRANSPORTATION INVESTMENTS



Private transportation investments are being made by existing businesses, institutions, and developers. These include operational measures such as private shuttles, transit partnerships with King County Metro, transportation management plans, as well as infrastructure investments for street frontage, utility upgrades, and street enhancements. The investments are integral to creating a vibrant South Lake Union and Uptown Triangle transportation system. Public agencies can facilitate and leverage these public investments to complete the transportation system.

**A** Support private shuttles with passenger load zones along public streets at appropriate locations.

**B** Support changes to State laws related to private shuttles that would make it easier for private businesses to share shuttle resources.

**C** Incentivize frontage improvements that are beyond City code requirements with Street Design Concept Plans (such as along Thomas Street) and allowing developers to get "credit" for additional improvements against other transportation mitigation requirements.

**D** Entice private transit funding through transit partnerships with matching grants or other funding mechanisms.

**E** Coordinate street and utility work within the right-of-way by implementing strategies such as joint trenching policies, and aligning capital improvement programs between SDOT, SPU, City Light and private utility providers.

**F** Coordinate transportation demand management plans among businesses and institutions.

**G** Manage neighborhood parking resources to share parking among various uses that have different peak demand characteristics.



# 7

## CREATE HUBS FOR MODE TRANSFER

There are two key locations where many transportation modes will intersect, and hubs to facilitate mode transfers could be created:

**T1: Thomas/Harrison Mobility Hub** -- This hub would be at the future Aurora Avenue RapidRide Station, between Harrison and Thomas Streets, where regional RapidRide service would meet local transit service. This node also connects with the Lake to Bay Loop trail, the Thomas Street Green Street and new east-west bike routes.

**T2: Valley Street Mobility Hub** -- This hub would be on Valley Street near Lake Union Park where the Lake Union Streetcar intersects with the Lake to Bay Loop trail and the Cheshiahud Trail. It is also in close proximity to Lake Union Ferry service and Kenmore Air Harbor.

Potential features include:

- Adjacent land uses that provides an inviting and safe walking environment
- Small-scale retail and services for transit riders
- Design amenities such as street furniture and artwork that create an identity for each node
- Convenient customer information about transit service
- Wayfinding to and from local attractions such as the Seattle Center, Lake Union Park, MOHAI, Center for Wooden Boats, United Tribes' Canoe Cultural Center, retail districts, Lake Union Water Taxi, Kenmore Air, and patient facilities at the Fred Hutchinson Cancer Research Center
- Good pedestrian connections with wide, well-lit sidewalks and signalized pedestrian crossings of major streets
- Bike storage
- Bike sharing facility



# T1: THOMAS / HARRISON MOBILITY HUB



T1: Thomas/Harrison Mobility Hub – This hub would be at the future Aurora Avenue RapidRide Station, between Harrison and Thomas Street where regional RapidRide service would meet local transit service. The node also connects with the Lake to-Bay Loop trail, the Thomas Street Green Street and new east west bike routes.



Most of the improvements can be implemented ahead of future development; a temporary bike station could be included at the corner to help establish a "Sense of Place"

## TRANSIT + TRANSPORTATION

- A1** Enhanced Pedestrian/Rider amenities at RapidRide and Metro Bus stops
- A2** Designated bus lanes and priority signals
- A4** Shuttle bus stop
- A5** Transit and community information kiosk
- A3** East-West Bus service

## PEDESTRIAN + BICYCLE

- B1** Activated building edges (cafes, shops, etc)
- B2** Safe pedestrian crossing with special intersection paving and treatments
- B4** Future Transit Oriented Development
- B5** Integrated bike station
- B6** Thomas Street concept design & green street improvements
- B7** Shared Bikeway
- B8** Pedestrian lighting
- B3** Wayfinding signs

T2: Valley Street Mobility Hub -- This hub would be on Valley Street near Lake Union Park where the Lake Union Streetcar intersects with the Lake-to-Bay Loop trail and the Cheshiahud Trail. It is also in close proximity to Lake Union Ferry service and Kenmore Air Harbor.

T2: VALLEY STREET MOBILITY HUB

TRANSIT + TRANSPORTATION

- A1** South Lake Union Streetcar
- A2** Bus to Ballard, Fremont and Greenlake (Future potential streetcar)
- A3** Private shuttle bus stop
- A4** Transit information kiosk
- A5** Kenmore Air Harbor
- A6** Lake Union Foot Ferry

PEDESTRIAN + BICYCLE

- B1** Pedestrian amenities and improvements
- B2** Bike lanes
- B3** Lake to Bay Trail
- B4** Cheshiahud Trail
- B5** Bike Station

CIVIC + COMMUNITY

- C1** Lake Union Park
- C2** Center for Wooden Boats Education Center (Future)
- C3** Museum of History and Industry (MOHAI)
- C4** Northwest Native Canoe Center (Future)
- C5** Special event opportunity at surface parking



# 8

## MOBILITY RECOMMENDATIONS MATRIX

1. Connect Communities	
A. Re-establish the east-west grid across Aurora Avenue at John, Thomas and Harrison Streets with attractive and safe "complete street" designs.	The North Portal of the Alaskan Way Viaduct Replacement project tunnel will remove a substantial volume of through traffic from Aurora Avenue N between Harrison Street and Denny Way and allow three existing streets—John Street, Thomas Street, and Harrison Street—to be reconnected across Aurora Avenue N. These reconnected streets provide new opportunities for east-west transit service, pedestrian connections, and bicycle connections.
B. Rename Aurora Avenue N between Harrison and Denny Way to its historic name: 7 <sup>th</sup> Avenue N.	The process to rename a street requires input from SDOT, and the Seattle Fire Department among others. It may also require City Council action.
C. Provide pedestrian and bicycle facilities on Thomas Street.	New facilities should be consistent with the City's Street Concept Plan and Green Street designation.
D. Provide a pedestrian/bicycle trail under Aurora Avenue N on Mercer Street.	This feature is proposed as part of the Mercer West project, which plans to widen Mercer Street under Aurora Avenue.
E. Create a RapidRide Station on surface Aurora Avenue N.	The RapidRide Station would be located on Aurora Avenue (to be renamed 7 <sup>th</sup> Avenue) between Harrison and Thomas Street. Other transit routes, such as those on Dexter Avenue N and 5 <sup>th</sup> Avenue N, should be diverted to Aurora Avenue to facilitate transfers. In addition, the station should integrate with other modes such as pedestrian and bicycle facilities on Thomas and Harrison Streets.
F. Design Harrison Street to accommodate future east-west bus service with stops at 7 <sup>th</sup> Avenue N.	The Alaskan Way Viaduct Replacement Project should incorporate features (such as increased pavement strength and sidewalk widths) for future transit service on Harrison Street between Dexter Avenue N and 5 <sup>th</sup> Avenue N.
G. Enhance the pedestrian crossings of 5 <sup>th</sup> Avenue N at Thomas Street and Harrison Street.	Existing traffic patterns—with a dual right turn from Harrison Street to 5th Avenue N—create difficult pedestrian crossing conditions in the vicinity of Seattle Center. The signal cycle is also very long, which delays pedestrian crossings. In the future, the removal of Broad Street and reconnection of the east-west grid of streets across Aurora Avenue will change traffic patterns and eliminate the dual-right turn movements. The North Portal design should address pedestrian crossings at the intersections of 5th Avenue N/Harrison Street and 5th Avenue N/Thomas Street/Broad Street, and consider pedestrian curb bulbs and special pavement treatments. Pedestrian countdown signals should be considered for all new intersections.
H. Provide turning radii for large trucks at key locations where trucks will access Mercer Street and the SR 99 ramps.	The Alaskan Way Viaduct Replacement Project and Mercer West project should include corner radii suitable for large trucks at Mercer Street/5 <sup>th</sup> Avenue (southeast corner), Mercer Street/6 <sup>th</sup> Avenue (southwest corner), and on the Republic Street off-ramp from northbound SR 99.
I. Widen the Denny Way overpass of Interstate 5 to provide bicycle lanes and a sidewalk on the north side of the overpass.	This is recommended by the <i>Seattle Bicycle Master Plan</i> to improve the connection to Capitol Hill.
J. Evaluate other pedestrian connection opportunities between South Lake Union and Capitol Hill.	There are limited connection points between the two neighborhoods north of Denny Way. Improvement opportunities could include stairs, trails, and/or a new pedestrian overpass of Interstate 5.
2. Improve Transit Service	
A. Provide east-west transit service on Harrison Street connecting Uptown and Capitol Hill through the heart of South Lake Union.	There is no east-west transit service between Uptown and South Lake Union north of Denny Way. Such service would be viable once the Viaduct Replacement project is complete and the grid of streets is reconnected across Aurora Avenue. New east-west transit should be located on Harrison Street between 5 <sup>th</sup> Avenue N and Fairview Avenue N to serve the heart of South Lake Union and the Uptown Triangle. This street should have physical features needed to accommodate buses including adequate pavement, wide sidewalks at bus stops, and good pedestrian-level street lighting.

B. Increase transit service through South Lake Union by rerouting select Interstate 5-to-Downtown routes to the new Mercer Street ramps and Fairview Avenue N.	Explore opportunities in conjunction with transit agencies to increase transit service through the South Lake Union neighborhood by rerouting select existing Interstate 5 transit routes to the Mercer Street ramps. Metro, Sound Transit and Community Transit operate many routes from North Seattle, Snohomish County, and the Eastside that use I-5 and exit to downtown at the Stewart Street ramps. The Mercer East project provides the opportunity to divert routes to exit at Mercer Street and then travel on Fairview Avenue to reach the downtown core.
C. Improve transit reliability and operating conditions on Fairview Avenue N to entice more transit to route through the South Lake Union neighborhood.	Faster and more reliable transit travel speeds along Fairview Avenue could make it a more attractive path for transit, and create opportunities for increased service levels described in #2B above. Enhancements could include signal coordination and signal priority as well as transit-only lanes and on-street parking removal/restrictions or queue-jump lanes at key intersections.
D. Identify acceptable bus layover locations in the two urban centers in exchange for extending existing bus route service to these neighborhoods.	A few all-day routes that serve destinations south of downtown Seattle "layover" in the Belltown area between trips. The layover provides a driver rest break and also allows buses to stay on schedule. There are a couple dozen peak commuter routes that could be extended to begin and end in South Lake Union/Uptown if on-street or off-site layover space were provided in the South Lake Union/Uptown neighborhoods. Riders using these buses would no longer need to transfer downtown.
E. Work with Sound Transit to have buses that now layover in the South Lake Union neighborhood to make stops in the neighborhood as part of their route.	There are several Sound Transit routes to and from Pierce County (Route 590, 592, 593, 594, and 595) that layover on the east side of Eastlake Avenue E. These routes use Republican Street to return to Eastlake Avenue E and their first stop on Stewart Street near 9 <sup>th</sup> Avenue. Service for South Lake Union riders could be improved by creating a stop along Republican Street or Eastlake Avenue E.
F. Concentrate transit service near the future RapidRide Station on Aurora Avenue N between Harrison and Thomas Streets.	Once the Viaduct Replacement Project North Portal is complete, a RapidRide Station for the E-Line would be located on Aurora Avenue (to be renamed 7 <sup>th</sup> Avenue) south of Harrison Street. The curb lanes in each direction on Aurora Avenue would be dedicated as Business Access & Transit (BAT) lanes that would connect to the transit lanes on Wall Street and Battery Street and link to the Third Avenue transit corridor through downtown. These new features provide an opportunity for other north-south routes in the area (Routes 26 & 28 that use Dexter Avenue and possibly routes on 5 <sup>th</sup> Avenue) to use Aurora Avenue via Harrison Street to create a transit transfer point. In addition, the community desires new east-west transit service along Harrison Street. This concentration of transit service would enhance transfer options and likely improve passenger safety by increasing the number of people in the area.
G. Add transit lanes on Aurora Avenue N (7 <sup>th</sup> Avenue N) that connect to the Wall Street/Battery Street transit lanes.	The curb lanes in each direction on Aurora Avenue (7 <sup>th</sup> Avenue N) should be dedicated as Business Access & Transit (BAT) lanes that would connect to the transit lanes on Wall Street and Battery Street and link to the Third Avenue transit corridor through downtown.
H. Increase nighttime and weekend transit service.	South Lake Union is transitioning and will have up to 12,000 residents in the future. This change from mostly an employment center to a mixed-use neighborhood will require more all-day and weekend transit service. In addition, patrons to Seattle Center and Lake Union Park events could be enticed to use more transit if it was available at the end of evening events and on weekends.
I. Improve pedestrian lighting and amenities at and approaching transit stops and mobility hubs.	Provide wide sidewalks with continuous pedestrian-scale lighting along major walking routes to major bus stops and transit stations. Add weather protection at bus stops. Pedestrian wayfinding signs should include information about major transit stations such as the Aurora RapidRide or Streetcar stations.
J. Support additional Streetcar routes.	Consider extending the South Lake Union Streetcar to other neighborhoods, including downtown, Uptown, Fremont and the University District. The highest priority would be to connect the First Hill Streetcar line to South Lake Union and the Seattle Center, most likely through downtown.
K. Improve ability to use transit to circulate among the downtown neighborhoods.	As residential and employment growth continues in South Lake Union and the Uptown Triangle, there will be increased need to circulate among the downtown neighborhoods at all hours of the day. New transit and/or an extended streetcar may be needed to facilitate this downtown circulation.

3. Serve Regional Access and Mobility	
A. Complete the Mercer West project.	This project proposes to widen Mercer Street under Aurora Avenue to three lanes in each direction plus turn lanes, and convert Mercer Street west of 5 <sup>th</sup> Avenue N to two way operations.
B. Convert Roy Street west of 5 <sup>th</sup> Avenue N to two-way operations and add bike lanes.	This is also proposed as part of the Mercer West project. It is intended to calm traffic and discourage through traffic on Roy Street.
C. Improve pedestrian crossings at intersections along Mercer and Roy Streets.	The West Mercer project should improve pedestrian crossings at the Queen Anne Avenue/Roy Street intersection by eliminating the dual left and right turn lanes on westbound Roy Street. Improving pedestrian flow and safety at this intersection is one of Uptown's highest priorities. In addition, the Mercer West project should provide signalized pedestrian crossing on Mercer Street between 1 <sup>st</sup> Avenue N and 3 <sup>rd</sup> Avenue N to improve the pedestrian connections to the Seattle Center. Key pedestrian crossings (Queen Anne Avenue N/Roy Street and Mercer Street/5 <sup>th</sup> Avenue) should be enhanced with special treatments such as stamped and colored pavement, in-pavement flashers, and other treatments.
D. Discourage through traffic from using Republican Street between Dexter Avenue N and Fairview Avenue N.	The new northbound off-ramp from SR 99 would connect to Republican Street. Although it is classified as an arterial, there are many local driveways and pedestrian crossings along it that would be adversely affected by high through volumes. The neighborhood desires that through traffic be diverted to Mercer Street with the use of signage, signal timing, and other traffic calming measures.
E. Provide turning radii for large trucks at key locations where trucks will access Mercer Street and SR 99.	See 1.H. above.
F. Provide signage for the travel route from westbound Mercer Street to southbound SR 99.	Left turns from westbound Mercer Street to southbound 6 <sup>th</sup> Avenue and on to the SR 99 southbound on-ramp will not be allowed. One alternative route would loop in a clockwise direction from Mercer Street to Taylor Avenue N to Valley Street and SR 99. This travel route to SR 99 should be signed.
G. Continue to engage community in planning for construction of the major infrastructure projects.	Construction management plans and procedures established for the Mercer East project should be continued and expanded for the Mercer West and North Portal projects. This planning should consider Seattle Center event traffic needs as well as appropriate detours for all modes of travel.
4. Encourage Walking	
A. Reconnect Harrison, Thomas, and John Streets across Aurora Avenue.	See 1.A. above.
B. Implement Green Street improvements along Thomas Street between Eastlake Avenue and 5th Avenue N.	Thomas Street is currently designated as a "Green Street" between Fairview Avenue N and Eastlake Avenue E, and could be extended west through the study area to 5 <sup>th</sup> Avenue N. In collaboration with neighborhood groups, property owners and individuals, the City of Seattle is developing a streetscape concept plan for Thomas Street from Eastlake Avenue E to Elliott Avenue W. A streetscape concept plan is an urban design plan to help guide future streetscape and public realm improvements that can be implemented over time either through frontage improvements by private development or through capital projects. The Thomas Street Streetscape Concept Plan incorporates the major changes that are part of the design for the north portal of the Alaskan Way Viaduct Replacement project, which will reconnect the street grid across Aurora Avenue N. The plan also accommodates the Lake-to-Bay Loop that will use a portion of Thomas Street via an extra-wide sidewalk on the north side of the street. Designated east-west bicycle facilities are desired on Thomas Street between 5th Avenue N and Eastlake Avenue E and should be incorporated into the streetscape concept plan.
C. Signalize pedestrian crossings of Westlake Avenue N at Thomas Street and John Street.	A signal is currently being installed at Westlake Avenue N/Thomas Street intersection, and will facilitate crossings of this two-way arterial. Future signalization of Westlake Avenue N/John Street intersection is also desired. Traffic signal warrants (minimum traffic and pedestrian volumes) would need to be met before SDOT would install this signal.

D. Implement a comprehensive pedestrian wayfinding program using the already-adopted City Wayfinding System standards.	Wayfinding signs will be needed along the area's proposed Loop Trails, and should also be provided for key neighborhood destinations such as retail nodes and parks. Hard-to-find destinations, such as the Fred Hutchinson Cancer Research Center, could also be signed. Seattle's Wayfinding System, which includes sign design standard, should be extended to the South Lake Union neighborhood. Key locations where signs should be installed include: <ul style="list-style-type: none"> <li>• Lake Union Park</li> <li>• Aurora RapidRide Station</li> <li>• Seattle Center – at base of Monorail</li> <li>• On Westlake Avenue at Streetcar stations</li> <li>• Along the Lake-to-Bay Loop Trail</li> <li>• Along routes to Fred Hutchinson</li> </ul>
E. Address vehicular circulation impacts on pedestrian mobility in the Cascade Neighborhood.	Several improvements are recommended to reduce vehicle-pedestrian conflicts in the Cascade neighborhood. <ol style="list-style-type: none"> <li>1. <b>Evaluate vehicle traffic control throughout neighborhood</b> – There is a mix of two-way and all-way stop-controlled intersections in the Cascade Neighborhood that can be confusing to motorists and pedestrians alike. The existing traffic control measures should be reviewed given the substantial growth and change in traffic patterns that have occurred in recent years. Intersections that remain two-way stop-controlled (stop signs on just the side street) could be enhanced with repainted stop bars. All-way stops may be warranted at other locations.</li> <li>2. <b>Implement traffic calming techniques on non-arterial streets with cut-through traffic</b> – Republican Street is the only designated arterial that passes through the Cascade Neighborhood. The other east-west streets—Harrison Street, Thomas Street, and John Street—are local streets. Traffic calming measures and special pedestrian crossing treatments, such as raised crosswalks and curb bulbs, could be considered to reduce traffic speeds and cut-through traffic between Eastlake Avenue E and Fairview Avenue E.</li> <li>3. <b>Consider all-way stop or traffic signal at Republican Street/Pontius Avenue E</b> to improve pedestrian crossings and provide for local circulation to the arterial street. This treatment would require that warrants for a traffic signal or all-way stop be met.</li> </ol>
F. Implement pedestrian improvements in the Denny Way Streetscape Concept Plan.	This includes widening the Denny Way Overpass of Interstate 5 to include a sidewalk on the north side, providing a signalized pedestrian crossing of Denny Way at Minor Avenue N, and improving crossings at key intersections. A new signal at Denny Way/Minor Avenue N would need to meet signal warrants and be approved by SDOT.
G. Improve pedestrian facilities along the Mercer Corridor.	There are many opportunities to improve pedestrian and bicycle mobility in the corridor. Key areas include: <ol style="list-style-type: none"> <li>1. <b>Provide wide pedestrian/bicycle path on Mercer Street under Aurora Avenue</b> – This feature is included in West Mercer project.</li> <li>2. <b>Improve pedestrian crossings at the Queen Anne Avenue/Roy Street intersection</b> – See 3.C. above.</li> <li>3. <b>Provide signalized pedestrian crossing on Mercer Street between 1st Avenue N and 3rd Avenue N</b> – See 3.C. above.</li> </ol>
H. Improve pedestrian-level lighting.	The priority for improved lighting should be key pedestrian streets and routes to major transit facilities.
I. Complete the Lake-to-Bay Loop trail.	Originally imagined as the Potlatch Trail, this 3.2-mile, pedestrian route between Lake Union and Elliott Bay would link several parks—Lake Union Park, Seattle Center, the Olympic Sculpture Park and Myrtle Edwards Park. After Mercer Street is widened under Aurora Avenue N, there would be a wide, multi-use path on the north side of that street that would provide the initial link among destinations. The loop would be complete once the Alaskan Way Viaduct Replacement project is completed and the grid of streets is reconnected across Aurora Avenue N. A wide sidewalk is proposed on Thomas Street along the north side to complete the loop route. A new pedestrian bridge across the BNSF mainline railroad tracks at Thomas Street will link the loop to the Elliott Bay shoreline. The loop would use a combination of sidewalks and separated trail along with wayfinding signs and maps to guide users along the route.

J. Enhance the Terry Avenue connection to Lake Union Park.	Terry Avenue is the main access to Lake Union Park. South of Mercer Street, Terry Street is being improved with streetscape improvements. The segment between Mercer Street and Valley Street should be improved with enhanced pedestrian crossings and sidewalk enhancement.
K. Prepare a Streetscape Concept Plan for Dexter Avenue N within South Lake Union.	Dexter Avenue N between Mercer Street and Denny Way has a very wide (106-foot) right-of-way. A Streetscape Concept Plan should be developed to guide extensive pedestrian, bicycle and landscape enhancements that could be made in this right-of-way.
<b>5. Support Biking</b>	
A. Make bicycle improvements proposed for the Mercer West project.	There are many opportunities to improve pedestrian and bicycle mobility in the Mercer Corridor west of Dexter Avenue N. Key elements include: <ol style="list-style-type: none"> <li><b>1. Provide wide pedestrian/bicycle path on Mercer Street under Aurora Avenue</b> – This feature is included in the project to widen Mercer Street under Aurora.</li> <li><b>2. Provide bike lanes on Roy Street</b> – The West Mercer project proposes to convert Roy Street to two-way operation and locate bike lanes on both sides of the street.</li> <li><b>3. Provide trail connection through Lower Kinnear Park</b> – A trail that meanders through Lower Kinnear Park proposed to link Roy Street, Mercer Street, and Prospect Street at Elliott Avenue. This would provide a non-motorized connection between Uptown and Elliott Bay Park via the pedestrian bridge that crosses the railroad tracks at Prospect Street.</li> </ol>
B. Provide for bicycles on Thomas Street between 5th Avenue N and Eastlake Avenue E.	Several east-west streets will be reconnected across Aurora Avenue N once the North Portal is complete: John Street, Thomas Street and Harrison Street. Thomas Street is also proposed to be a Green Street, and will likely have the lowest vehicular traffic. Bicycle facilities should be incorporated into the Street Concept Plan.
C. Improve the Dexter Avenue N bike lanes between Roy Street and Denny Way.	SDOT is currently improving the north segment of the Dexter Avenue N between Roy Street and the Fremont Bridge. This project includes many features to improve the bike lane, including a buffer between the bike lane and the travel lane. Some of these treatments could be extended to the segment of Dexter Avenue between Roy Street and Denny Way. <p>One improvement that should be considered as part of the Dexter Avenue N bike lane is to add a right-turn pocket to the right side of the bike lane on southbound Dexter Avenue N at Harrison Street to reduce conflicts with right-turning vehicles destined to SR 99 via Harrison Street. A green bike lane at this location could also be considered.</p> <p>At the Mercer Street intersection, consider treatments such as bicycle boxes and signal phasing to improve the transitions between Dexter Avenue N and the Mercer Street bike path.</p>
D. Improve bicyclist safety along 9th Avenue with signal changes at Denny Way and at Harrison Street.	Three improvements are recommended to enhance mobility along and across 9th Avenue: <ol style="list-style-type: none"> <li><b>1. Improve street lighting</b> – stakeholders report that existing lighting is dim.</li> <li><b>2. Operate the traffic signal at 9th Avenue/Harrison Street at all times</b> – This signal sometimes operates as a signal, and sometimes in a flashing mode where the side street traffic on Harrison Street must stop. Both pedestrians and motorists are confused about who has the right of way.</li> <li><b>3. Provide a separate southbound left turn phase at the 9th Avenue/Denny Way/Bell Street intersection</b> – 9th Avenue and Bell Street do not align across Denny Way, but operate on the same signal phase. Southbound left turn traffic is supposed to yield to oncoming northbound through traffic on Bell Street; however, bicyclists report that motorists often turn in front of them. Providing a separate left turn phase would improve this condition.</li> </ol>
E. Provide for bicycles on Harrison Street between Fairview Avenue N and 5th Avenue N. Install a signal at Eastlake Avenue N.	These projects are from the <i>Seattle Bicycle Master Plan</i> .

F. Provide for bikes on Fairview Avenue N between Valley Street and Denny Way.	The <i>Seattle Bicycle Master Plan</i> calls for improvements along Fairview Avenue N, including intersection improvements at Denny Way, Valley Street and Mercer Street. Fairview Avenue N is also targeted by the South Lake Union Mobility Plan for transit enhancements. If a Business Access and Transit (BAT) lane is located on Fairview Avenue N, it could be shared with bicyclists. Special treatments would be needed on northbound Fairview Avenue N approaching Mercer Street because of the dual right-turn lane in this location.
G. Evaluate 5th Avenue N as a potential north-south bicycle connection.	Depending on right-of-way availability a two-way cycle track may be an appropriate facility type for 5th Avenue N.
H. Locate bike storage near major transit stations.	Bicycles can link transit to areas that might be beyond a comfortable walking distance. Secure bicycle storage at major transit stations that support this mode change.
I. Create a bike sharing program for Uptown, South Lake Union and Seattle Center.	The two Urban Centers of Uptown and South Lake Union are an ideal location for a Bike Share program. The neighborhoods are relatively flat, have (or will have) a robust grid for bicycling, and have major attractions that could be linked by bike. Successful bike share programs provide closely-spaced locations where users can access bicycles. Bike share facilities could be located at the major attractions, including Seattle Center, Lake Union Park, the Aurora Transit Station, and Denny Park, as well as at other locations such as near retail districts, major employment centers, and community facilities. The neighborhoods should work with the City of Seattle and King County Metro to develop a framework and business model.
J. Consider bike boxes and bike signals along key bike routes	For signalized intersections that require side-street detection of vehicles or pedestrians, provide in-pavement or video detection for bicycles. Key locations could include Roy Street west of Taylor Avenue, Thomas Street between 5th Avenue N and Eastlake Avenue N, and Dexter Avenue N.
<b>6. Leverage Private Transportation Investments</b>	
A. Support private shuttles with passenger load zones along public streets at appropriate locations.	There are many companies and institutions that use private shuttles to transport employees and patients to sites in South Lake Union. They are not able to use public transit stops for loading and unloading. Several entities have worked with the City of Seattle to locate passenger load zones adjacent to transit stops, which makes it easier for shuttles to maneuver to and from the curb. The City should work with the neighborhoods to identify appropriate load zone locations and curb lengths. A new type of load zone—one that can only be used by authorized shuttles—should also be considered.
B. Support changes to State laws related to private shuttles that allow for private businesses to share resources.	State laws restrict operations for businesses operating private shuttles so that they do not compete with public transit. This can limit the ability for entities to share private shuttle services.
C. Incentivize frontage improvements.	Many desired frontage improvements are beyond City code requirements. This could include more extensive improvements than are typically required in order to comply with Street Design Concept Plans (such as along Thomas Street or Denny Way). Developers should be encouraged to enhance their frontages through credits against other transportation mitigation requirements or through other bonus programs.
D. Entice private transit funding through transit partnerships with matching grants or other funding mechanisms.	Businesses and institutions in South Lake Union have helped to fund past transit improvements through King County Metro's transit partnership program. That program or others should be continued and/or expanded.
E. Coordinate street and utility work within the right-of-way.	Construction disruptions related to street and utility upgrades should be minimized by implementing strategies such as joint trenching policies, and aligning capital improvement programs between SDOT, SPU, City Light and private utility providers.
F. Coordinate transportation demand management plans among businesses and institutions.	Businesses and institutions may be able to enhance travel demand management by coordinating plans and services including shared carpool or vanpool matching, coordinated private shuttle service (see 6.B. above), and leveraging key transit improvements that would serve multiple site needs.

G. Manage neighborhood parking resources to share parking among various.	Consider a program to manage parking resources to serve uses that have different peak demand characteristics. This could include sharing office parking that is needed on workdays with events that need parking in the evening or on weekends.
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**7. Create Hubs for Mode Transfers**

A. Create hub around the Aurora Avenue Rapid Ride Station.	There are two key locations where many transportation modes will intersect. One hub would be at the future Aurora Avenue RapidRide Station, between Harrison and Thomas Streets, where regional RapidRide service would meet local transit service. This node also connects with the Lake-to-Bay Loop trail, the Thomas Street Green Street and new east-west bike routes.
B. Create hub on Valley Street near Lake Union Park.	This hub would connect the South Lake Union Streetcar with the Lake-to-Bay Loop Trail, Cheshiahud Trail, and Valley Street bike paths. It would also be in close proximity to Kenmore Air Harbor and the proposed Lake Union Foot Ferry.

**Holmes, Jim**

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**From:** Gloria Hennings |  
**Sent:** Wednesday, March 02, 2011 11:43 AM  
**To:** DPD\_Planning\_Division  
**Subject:** South lake Union

Please consider keeping the height restrictions at the current restrictions. The additional height would hinder airplane paths as well as cause a strong impact on the neighborhood.

Thank you for your consideration.

Gloria Hennings

1

Frederick & Margaret Herb  
116 Fairview Ave N. Apt. 616  
Seattle WA, 98109

April 8, 2011

Seattle Department of Planning and Development (DPD)  
Attn: Jim Holmes  
700 Fifth Ave., Suite 1900  
PO Box 34019

RE: South Lake Union Environmental Impact Statement

Dear Mr. Holmes

We are residents of South Lake Union and have also lived in Belltown for 18 years. In reviewing the South Lake Union (SLU) EIS and its proposed alternatives, it is our opinion that there are several shortcoming or oversights. The important ones are:

- No provision for families in the community. There are no schools and limited playgrounds! Yet, Amazon plans to have 6000 employees working in SLU within five years, per a Dec 22, 2007 Seattle Times article. Supporting services and other businesses will add substantially more employees to the 6000. According to 1996 Department of Labor data approximately 40% of these employees will have school age children. Where are they going to live? Not in SLU, unless schools are added to the neighborhood. If not, they will have to commute from family friendly communities. | 1
- Limited and expensive parking – Given the densities the EIS is proposing, the current ground level parking lots will likely be built on. This will result in fewer and/or more expensive in-building parking. This will harm the many patients and visitors to the biotech and other health care services in the area. Car parking for lesser paid employees will be prohibitive, and resident street parking permits may be in jeopardy. | 2
- Poor commuter access into and out of SLU. While north/south transit service is adequate, the east/west service is limited to a single Metro bus, route #8. This bus has a dismal on-time record because it travels on highly congested Denny Way and originates 10 miles away on the east side at S. Henderson and Rainier Ave S. It is not unusual for three buses to arrive at the same time at a stop. Denny Way is one of the most congested streets in Seattle. | 3
- The proposed densities will create a community with shallow roots. New housing will be apartments and costly high-rise condominiums. Most of the residents will be transients, yuppies, empty-nesters, and second or third home occupants. Most will be short-timers or occupied with interests outside of the community. | 4
- The proposed densities and setbacks are reminiscent of the planning mistakes made in the last decade in north Belltown and the Denny Triangle, where high-rise building are adjacent | 5

with little or no setback. A walk or drive along Western or Elliot Avenues in Belltown is like going through concrete canyon where you will rarely see your shadow. Eighty-five foot high podiums as identified for Alternative 1 and ten foot upper level setbacks as shown in the SLU Design Framework do not make any sense in perpetually cloudy Seattle. Further, we would strongly urge limiting towers to one per block. If developers acquire full blocks they should be allowed to vacate the alleys, center their towers and go as high as they care to with correspondingly wider setbacks.

5 cont

- High-rise condominiums at the base of Lake Union will block the lake view and diminish the value of residential building behind them. As a consequence the cumulative value of the neighborhood will likely be less than if step-down zoning to the lake were enforced.
- There does not appear to be a requirement that all of the additional height bonus benefits be used in South Lake Union. It seems inappropriate to derive benefits from one neighborhood and to apply them to another.
- Our general observation is that the EIS document is long on information but short on mitigating solutions. There is a lot of work remaining to be done.

6

7

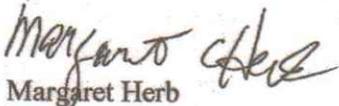
8

We trust that the Department of Planning and Development will consider our concerns and suggestions as they continue their future planning for South Lake Union.

Sincerely,



Frederick Herb



Margaret Herb

Cc: Seattle City Council Members

Dept. of  
Planning & Development

APR 12 2011

RECEIVED

April 11, 2011

Seattle Department of Planning and Development  
Attn: James Holmes  
700 Fifth Avenue, Suite 1900  
P.O. Box 34019  
Seattle, WA 98124-4019

Re: South Lake Union  
Height and Density Alternatives  
Draft EIS

Dear Mr. Holmes:

Thank you for the opportunity to comment on the Draft EIS for the South Lake Union Height and Density Alternatives proposal. This comment is on behalf of Touchstone Corporation.

Touchstone, other property owners and a number of locally headquartered companies have commented on the proposed 24,000 sf floorplate limitation on commercial towers. They have explained that this proposed limitation is unworkable for today's high tech tenants. Rather, a maximum 35,000 sf floorplate should be studied under Alternative 1.

1

It is fully appropriate that the Final EIS evaluate this modification of Alternative 1. Indeed, it is required. "The lead agency shall prepare a final environmental impact statement [and] shall consider comments on the proposal and shall respond [to those comments]" WAC 197-11-060(1). Possible responses are to: (a) **modify alternatives including the proposed action**; and (b) develop and evaluate alternatives not previously given detailed consideration by the agency. Id. See also 2003 SEPA Handbook at Section 3.5.1 ("The lead agency **must consider comments received during the draft EIS comment period, and respond to them in the final EIS**" (emphasis added)).

2

Because such a modification to Alternative 1 would result in no increase in allowed FAR, it would appear that an environmental analysis of this modification could be limited to the issues of aesthetics and open space. No additional impacts to geology and soils, air quality, water quality, plants and animals, environmental health, noise, energy, land use, housing, historic or cultural resources, transportation, public services, or utilities would be expected.

Thank you for your consideration of this comment.

Sincerely,

A handwritten signature in black ink, appearing to read "G. Richard Hill". The signature is written in a cursive, somewhat stylized font.

G. Richard Hill

cc: AP Hurd  
Douglas Howe  
Diane Sugimura

**Holmes, Jim**

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**From:** Hillary Holberg  
**Sent:** Monday, April 11, 2011 1:31 PM  
**To:** DPD\_Planning\_Division  
**Subject:** South lake union

I grew up in the greater Seattle area and attended college in the city. I now work throughout Seattle and dine and shop in the south lake union area. I am in support of the expansion of the neighborhood because more people in the area will mean more people to support the retailers and restaurants. This expansion also reduces the need to live and work in different areas and will make it more attractive to those looking to relocate. Please consider rezoning the South Lake Union neighborhood. 1

thanks,

Hillary

**Holmes, Jim**

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**From:** Robert J. Holmes | The Holmes Group (THG, LLC) [rholmes@thgadvisory.com]  
**Sent:** Thursday, March 24, 2011 8:01 PM  
**To:** DPD\_Planning\_Division  
**Subject:** MY VIEW ON SOUTH LAKE UNION ZONING

I support the proposed zoning changes in SLU.

My reasons are many but most importantly is that density is good. Density supports mass transit and walkable communities as well as housing affordability and housing choice.

This zoning will send a positive message through the USA development community as well as the finance community. Seattle is open for business. It sends a positive message and hopefully counteracts the foolish musings of a mistaken misguided Mayor. Money, and access it, is the fuel that makes the economy run. We need jobs, better yet higher paying jobs, and the SLU neighborhood has demonstrated an ability to attract job producing industry and implement same (SBIR, Children's, NBBJ and Skanska to name a view).

It not only a time for action but a time for the Council to lead. Being against is easy, being supportive is courageous. Time to lead.

Thanks for the opportunity to comment.



April 6, 2011

Jim Holmes  
City of Seattle  
Department of Planning and Development  
700 Fifth Ave, Suite 2000  
Seattle, WA 98124-4019

Dear Mr. Holmes,

**Touchstone is supportive of zoning that is consistent with EIS Alternative 1 with the addition of larger commercial office floorplates of 35,000SF.**

Touchstone is a leading regional developer of transit-oriented, mixed-use projects. We pride ourselves on delivering exceptional value to tenants with a focus on technology and biotechnology companies. Furthermore, we have a 30 year commitment to the region and its communities and we strive to create legacy neighborhoods that strengthen those communities. We have developed award winning commercial buildings in Seattle, including in the Denny Triangle and Belltown. Most recently, our Kirkland Park Place redevelopment project (in Kirkland, WA) was recognized by the Quality Growth Alliance as a leading example of a project that meets our regional development goals with sensitivity to community, context and environment.

We control two properties in the South Lake Union and Cascade neighborhoods and have reviewed the Draft EIS. While there are many aspects of the DEIS that are worthy of comment, we limit our suggestions in this letter to three key issues that we feel are critical to the successful growth of this neighborhood and to the city as a whole:

- 1. The analysis framework for CO2 impacts is flawed.
- 2. A mismatch exists between the employment program of growth tenants and max office floorplates.
- 3. The analysis of Aesthetics and Open Space should evaluate alternatives to podiums.

**1. Analysis framework for CO2 impacts is flawed**

The analysis of Air Quality on p.1-11 of the DEIS and of Energy/GHG emissions on p. 1-14 of the DEIS is flawed because of a problem with the system boundary for the analysis. The DEIS leads readers to believe that limiting growth in urban centers improves our air quality and carbon footprint. This analysis is only correct if the growth that is limited in urban centers doesn't occur anywhere else. In reality, growth that is not accommodated in urban centers occurs instead at the fringe of the city which leads to far higher GHG emissions from travel (since trips to and from the fringe are longer and less likely to happen on non-SOV modes) and infrastructure (since the infrastructure needs to cover longer distances and is used less intensively).



A more appropriate analysis framework would either account for a fixed amount of growth and examine the CO2 impacts of having it clustered in an urban center (vs. more dispersed in the lower density alternatives). Another option is to look at the CO2 profile of the region and evaluate different options for clustering growth, with non-SLU growth being accommodated elsewhere.

2 cont

This is not unlike balancing a budget-- money for a budget needs to come from somewhere, and growth for a region needs to go somewhere. It's erroneous to just ask people about the impact of more money for schools (and show that schools do better with more money) without thinking about where the extra money will come from and what will be the negative impact of *those* cuts.

## **2. A mismatch exists between the employment program of growth tenants and max office floorplates**

3

South Lake Union has gained prominence as a choice location for companies in the information technology and biotech industries and is the logical "expansion valve" for downtown to accommodate our region's high growth companies.

The four alternatives in the DEIS contemplate maximum floor-plate sizes of 24,000 SF for commercial office towers. This is inadequate to meet the program requirements of companies in the information technology and biotechnology sectors. At Touchstone we work closely with these companies in developing technology office projects and we consistently hear them looking for floorplates in the 35,000 to 40,000 SF range. This is frequently a major filtering criterion for tech. and life science enterprises in selecting a location. They prefer large floorplates because they are more mechanically efficient and they enable more collaboration and innovation within and among their workgroups.

Given the growth that these industries have--and will-- catalyze in our region over the next two to three decades, it seems critically important to preserve the opportunity to zone in a way that is consistent with their program needs. In fact, if we zone in a way that does not meet their needs, we will push these companies to locate elsewhere to the detriment of:

- our City's economy,
- our ability to reach our GMA growth targets in South lake Union, and
- our City's ability to access funding for low income housing through the incentive zoning program.

The final EIS must account for larger floor plate studies. We recognize that including such study may incur some additional costs (even though FAR and height would be held constant). However, it seems clear that losing these tenants to another region would be an unacceptable price to pay for a few dollars saved. At a minimum, the Fairview employment corridor (both sides of Fairview) is an important micro-region in which to conduct such a study.

## **3. The analysis of Aesthetics and Open Space should evaluate alternatives to podiums**

4

The 4 Alternatives contemplated in the DEIS all allow full-block podiums of varying heights. In the case of nearly every block, exploiting the full FAR available depends on building out the full podium. This creates a strong incentive to do full-block podiums which are not ideal from an urban design perspective *particularly* on the 100,000+ SF blocks along Fairview.

We suggest that the final EIS consider creating more ground floor open space as an alternative to 100,000SF podiums, in exchange for being able to exploit the FAR in larger (35,000SF) floor-plate towers. We strongly suspect that the Aesthetics and Open Space impacts from the public pedestrian level would be substantially reduced, even with the marginally larger floorplates. On the whole, this would be a configuration that mitigates impacts while still deploying FAR to support our region's GMA goals.

We appreciate your consideration of these comments.

Best regards,



Douglas Howe

A-P Hurd



Holmes, Jim

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From: Mary Hoy  
Sent: Monday, April 11, 2011 3:37 PM  
To: Holmes, Jim  
Subject: Re: South Lake Union Height & Density Draft EIS Comments

April 11, 2011

James Holmes, Senior Urban Planner  
City of Seattle Department of Planning & Development  
700 – Fifth Avenue, Suite 1900  
Seattle, WA 98101

Re: South Lake Union Height & Density Draft EIS Comments

Dear Mr. Holmes:

My name is Mary Hoy and I'm a business owner and resident in the Roosevelt Neighborhood. What's compelled me to comment on the South Lake Union DEIS is that I'm a big fan of transit oriented development and support the concept of greater residential/job density near the Roosevelt Light Rail Station. We have our share of a few vocal neighborhood activists who oppose increased building density just to preserve the status quo and protect private views.

I've observed the opposition to "smart growth" by the Lake Union Opportunity Alliance (LUOA) who state they embrace development, welcome vibrancy, are excited for growth, and will do everything they can to make sure the people living in and around South Lake Union can say: ***"It was Done Right In My Back Yard!"*** How ironic that this so-called community group strongly opposed the expansion of the University of Washington School of Medicine Research Facility in South Lake Union and take an out-dated approach of supporting lower building heights as you get closer to Lake Union. Protecting private views is not in the best interest of the City of Seattle and South Lake Union will become even greater in the near future by adopting Alternative 1.

The growth of the South Lake Union neighborhood has been one of the few bright spots for the entire City during this recession – retaining and expanding the Amazon Campus, growth of the UW School of Medicine Research Facility, and Museum of History of Industry calling Lake Union Park it's new home. I look forward to the day when I can take my grandchildren on a streetcar ride to Lake Union Park that is activated by quality taller buildings along Valley Street with active retail and great plazas.

Please support and adopt Alternative 1 that will benefit my grandchildren and citizens of Seattle.

Thank you for the opportunity to comment.

Mary Hoy

Holmes, Jim

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From: Brock Huard [bhuard@espenseattle.com]  
Sent: Tuesday, March 29, 2011 9:05 PM  
To: DPD\_Planning\_Division  
Subject: Density in SLU

As an owner in South Lake Union I want to make clear my support of Alternative A-1. I would like to see higher commercial zoning for 8th Ave. North and an upzone will benefit many. The upzone will provide for more efficient land use, should reduce urban sprawl, and will maximize density and height. 1

It is clear that South Lake Union is on the cutting edge of growth and development as SLU has the existing, paid for infrastructure, especially when it comes to transportation, to push for proper growth. While at the same time it's proximity to the downtown core is invaluable.

With affordable housing, biotech and tech companies adding jobs, it is clear South Lake Union is thirsty and capable of more density and growth.

In summary, if not more density in South Lake Union, WHERE?

Sincerely,

Brock Huard

**Holmes, Jim**

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**From:** Huberty, Dan [r]  
**Sent:** Monday, March 28, 2011 8:51 AM  
**To:** DPD\_Planning\_Division  
**Subject:** South Lake Union Height and Density Draft Environmental Impact Statement

When the voters rejected the proposed South Lake Union Park, there was concern about what the future of the area would be. Change was inevitable given the value of the land and its proximity to the City Center, Seattle Center and the University of Washington as well as the investments already made in the area by the Hutch and other businesses. Since then the investments by the City and the planning by the City, neighborhood and property owners has resulted in development of public and private projects that have seemingly achieved many of the objectives envisioned in the original Park plan.

Over the last ten years the South Lake Union neighborhood has evolved from a collection of basically one story buildings into a collection of midrise buildings providing an environment for work, home and play. As I look at the scale model of the area it is apparent that this area could absorb much more density, not unlike the central business district. Such density would make use of the existing infrastructure in lieu of investing in new infrastructure elsewhere, maximize the use of scarce land and place development where there is access to a variety of transportation options. The added density will also support the businesses that have already located there as well as encourage new business and increase the diversity of office tenants.

I support the increase height and density proposed in the subject Impact Statement and encourage the City to plan for the long term future and to capitalize on the investments the City and the private sector has already made in the area.

**Dan Huberty** ZGF ARCHITECTS LLP  
FAIA D 206.521.3402 F [dan.huberty@zgf.com](mailto:dan.huberty@zgf.com)  
Partner 925 Fourth Avenue, Suite 2400  
Seattle, WA 98104

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Holmes, Jim

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**From:** Brendan Hughes  
**Sent:** Monday, April 11, 2011 9:51 AM  
**To:** DPD\_Planning\_Division  
**Subject:** SLU EIS

I'm a North Seattle resident and frequently spend time with friends in South Lake Union after work or on the weekends. Over the past year, I've noticed the streets filled with more people as more employers like Amazon move into the neighborhood and new restaurants open. I think it is just a glimpse of what is possible in this urban center. There are many reasons I support taller buildings in South Lake Union, but ultimately it comes down to how our city can best accommodate people into the urban core instead of outlying neighborhoods - i.e. growing up instead of out. If not in South Lake Union, where else do we expect to place growth that is coming in Seattle whether we like it or not? The city should support the alternative #1 because it is the most aggressive and the most responsible option to ensure we grow smart. 1

Thank you,

Brendan Hughes

Holmes, Jim

From: A-P Hurd
Sent: Monday, April 11, 2011 11:02 AM
To: DPD\_Planning\_Division
Subject: Support the Alt 1 Rezone in South Lake Union with 35,000SF Technology Office Floorplates
Attachments: Touchstone Support Letter.pdf

Dear Mr. Holmes,

Touchstone is supportive of zoning that is consistent with EIS Alternative 1 with the addition of larger commercial office floorplates of 35,000SF.

Touchstone is a leading regional developer of transit-oriented, mixed-use projects. We pride ourselves on delivering exceptional value to tenants with a focus on technology and biotechnology companies. Furthermore, we have a 30 year commitment to the region and its communities and we strive to create legacy neighborhoods that strengthen those communities. We have developed award winning commercial buildings in Seattle, including in the Denny Triangle and Belltown. Most recently, our Kirkland Park Place redevelopment project (in Kirkland, WA) was recognized by the Quality Growth Alliance as a leading example of a project that meets our regional development goals with sensitivity to community, context and environment.

We control two properties in the South Lake Union and Cascade neighborhoods and have reviewed the Draft EIS. While there are many aspects of the DEIS that are worthy of comment, we limit our suggestions in this letter to three key issues that we feel are critical to the successful growth of this neighborhood and to the city as a whole:

- 1. The analysis framework for CO2 impacts is flawed.
2. A mismatch exists between the employment program of growth tenants and max office floorplates.
3. The analysis of Aesthetics and Open Space should evaluate alternatives to podiums.

1. Analysis framework for CO2 impacts is flawed

The analysis of Air Quality on p.1-11 of the DEIS and of Energy/GHG emissions on p. 1-14 of the DEIS is flawed because of a problem with the system boundary for the analysis. The DEIS leads readers to believe that limiting growth in urban centers improves our air quality and carbon footprint. This analysis is only correct if the growth that is limited in urban centers doesn't occur anywhere else. In reality, growth that is not accommodated in urban centers occurs instead at the fringe of the city which leads to far higher GHG emissions from travel (since trips to and from the fringe are longer and less likely to happen on non-SOV modes) and infrastructure (since the infrastructure needs to cover longer distances and is used less intensively).

A more appropriate analysis framework would either account for a fixed amount of growth and examine the CO2 impacts of having it clustered in an urban center (vs. more dispersed in the lower density alternatives). Another option is to look at the CO2 profile of the region and evaluate different options for clustering growth, with non-SLU growth being accommodated elsewhere.

This is not unlike balancing a budget-- money for a budget needs to come from somewhere, and growth for a region needs to go somewhere. It's erroneous to just ask people about the impact of more money for schools (and show that schools do better with more money) without thinking about where the extra money will come from and what will be the negative impact of those cuts.

2. A mismatch exists between the employment program of growth tenants and max office floorplates

South Lake Union has gained prominence as a choice location for companies in the information technology and biotech industries and is the logical "expansion valve" for downtown to accommodate our region's high growth companies.

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cont

The four alternatives in the DEIS contemplate maximum floor-plate sizes of 24,000 SF for commercial office towers. This is inadequate to meet the program requirements of companies in the information technology and biotechnology sectors. At Touchstone we work closely with these companies in developing technology office projects and we consistently hear them looking for floorplates in the 35,000 to 40,000 SF range. This is frequently a major filtering criterion for tech. and life science enterprises in selecting a location. They prefer large floorplates because they are more mechanically efficient and they enable more collaboration and innovation within and among their workgroups.

Given the growth that these industries have--and will-- catalyze in our region over the next two to three decades, it seems critically important to preserve the opportunity to zone in a way that is consistent with their program needs. In fact, if we zone in a way that does not meet their needs, we will push these companies to locate elsewhere to the detriment of:

- our City's economy,
- our ability to reach our GMA growth targets in South lake Union, and
- our City's ability to access funding for low income housing through the incentive zoning program.

The final EIS must account for larger floor plate studies. We recognize that including such study may incur some additional costs (even though FAR and height would be held constant). However, it seems clear that losing these tenants to another region would be an unacceptable price to pay for a few dollars saved. At a minimum, the Fairview employment corridor (both sides of Fairview) is an important micro-region in which to conduct such a study.

### **3. The analysis of Aesthetics and Open Space should evaluate alternatives to podiums**

The 4 Alternatives contemplated in the DEIS all allow full-block podiums of varying heights. In the case of nearly every block, exploiting the full FAR available depends on building out the full podium. This creates a strong incentive to do full-block podiums which are not ideal from an urban design perspective *particularly* on the 100,000+ SF blocks along Fairview.

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We suggest that the final EIS consider creating more ground floor open space as an alternative to 100,000SF podiums, in exchange for being able to exploit the FAR in larger (35,000SF) floor-plate towers. We strongly suspect that the Aesthetics and Open Space impacts from the public pedestrian level would be substantially reduced, even with the marginally larger floorplates. On the whole, this would be a configuration that mitigates impacts while still deploying FAR to support our region's GMA goals.

We appreciate your consideration of these comments.

Best regards,

A-P Hurd

 touchstone

2025 First Ave, Suite 1212  
Seattle, WA 98121

Holmes, Jim

From: Doug Ito [dito@smrarchitects.com]  
Sent: Thursday, March 31, 2011 1:41 PM  
To: DPD\_Planning\_Division  
Subject: SLU EIS comments

Seattle Department of Planning and Development

Attn: James Holmes

700 Fifth Avenue, Suite 1900

P.O. Box 34019

Seattle, WA 98123-4019

March 31, 2011

Re: South Lake Union EIS.

Mr. Holmes

The following comments reflect my personal concerns and comments concerning the EIS for the South Lake Union area in Seattle. As an architect that was born and raised and lives and works in this city, I have a vested interest in what our city is, and will become in the future.

Seattle's "downtown core" is limited by a number of geographical features, Capitol Hill to the East, Puget Sound to the West, on the Northwest is Queen Anne Hill, and South edge of downtown is bordered by a historic district, stadiums built on fill. That leaves South Lake Union neighborhood as our City's best option to expand its vital and exciting urban center, while limiting that impact on Seattle's great neighborhoods.

This expansion area is also very limited and to maximize the opportunity for Seattle to grow the best option as see it is to allow for taller structures. Height equals Density. To allow for added growth via height and density in South Lake Union would do a number of things:

It's environmentally sound – walk-able districts close to jobs are less auto oriented and also increases the use of bikes and transit.

Reduces urban sprawl – and thus protects farmlands and wilderness areas

Economically sound – It creates jobs, and increases the tax base.

In summary my comments are to increase density, and height in this area.

Thank you

**Holmes, Jim**

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**From:** Annalisa Johnson  
**Sent:** Monday, April 11, 2011 11:02 AM  
**To:** DPD\_Planning\_Division  
**Subject:** SLU EIS Comment

I work in South Lake Union but I also enjoy the neighborhood for its abundance of great restaurants. Over the past five years the neighborhood has changed significantly. Where before it was relatively unknown and underutilized given its proximity to downtown Seattle, it now boasts of global employers and famous chefs' restaurants. The neighborhood is eclectic and energized – more so every day.

In order to continue to build a great neighborhood to live, work and play in we need to allow for more efficient development so that it can support both business and residential needs. This type of development is environmentally conscious. If a person can live and work in the same area the need for a car is reduced. It allows for more direct and useful transit options which are greatly needed in the Seattle area.

Please consider rezoning the South Lake Union neighborhood. Make South Lake Union a national example of sustainable urban growth.

Thank you,  
Annalisa Johnson

March 17, 2011

To Whom It May Concern:

I am writing this letter in support of the South Lake Union Height & Density Draft Environmental Benefits Statement. I firmly believe that it is in the best interest of the City of Seattle and surrounding Metro area to allow growth in the downtown areas by increasing the density in our Cities and slowing down the urban growth that has put undue pressure on the outlying areas roads and infrastructure. I also believe that the City of Seattle needs to expand the downtown area north into South Lake Union and taller buildings that may result would be a positive not negative impact for the City and region. Many recent studies point to the need to have live/work neighborhoods within our Cities and South Lake Union is a prime example of what this can and will look like in the future. South Lake Union has long languished in the shadow of downtown and now is the time to tie the sub-areas together and respond to the demands of our employers and employees who want to live and work downtown.

While I don't live in the City of Seattle, I have worked, shopped and enjoyed the cultural events there for over forty years and seeing the redevelopment of South Lake Union has been an exciting process that I believe is just the beginning for Seattle as other areas (SODO for example) see the positives and move forward with their own development initiatives. The jobs that are being brought to the area would most certainly be lost to urban locations or possibly other States without these proposed increases and the tax dollars and employee spending would be lost at a time when the City of Seattle needs it the most. I believe the projects that have been ongoing in the South Lake Union area even in these very tough economic times are a testament to the allure of working, living and playing in a downtown area and the City should build upon what they have started not restrict it with low-rise construction and low FAR's (as compared to downtown).

The timing is right, the location is a natural, the City needs room to grow and this proposal should be approved.

Sincerely,



Jay-S. Johnson

April 9, 2011

Dear Seattle Department of Planning and Development:

In response to the EIS Comment Period - SLU Height & Density, I am writing in support of additional height and density in South Lake Union. I represent a specific community/perspective regarding the South Lake Union neighborhood.

I was born in Seattle and I have lived in the Seattle area all of my life. I believe that I am familiar with Seattle and the general history regarding the SLU neighborhood. Several years ago, I worked in the SLU area and lived on Queen Anne for approximately 5 years. In the past, I spent a lot of time sailing, which has from time to time involved visiting South Lake Union via the Lake to enjoy some of the local restaurants. The home office of the company where I am currently employed, and have worked at for approximately 4 years is located in the SLU neighborhood.

I support a neighborhood in SLU because of its location to DT Seattle and other attractions. SLU is an area where families can live, easily utilize public transportation, walk or bicycle to work, school or play. The neighborhood is located in a wonderful area & until the recent development of the area; the neighborhood was pretty much "deprived" from being enjoyed by Seattle for business opportunities and any desirable places to live. The SLU neighborhood has been energized over the past few years – this has benefited Seattle. The neighborhood no longer appears to be "dying on the vine," it has come to life.

My request to the City and decision makers is to move forward in fostering the future development of SLU neighborhood & to stimulate growth and prosperity of the neighborhood. I believe this would benefit the people of Seattle by continuing to revive a beautiful area into a neighborhood where people live, work, and go to school and play. With strategic and careful planning, taller buildings would minimize urban sprawl and bring even more life to the neighborhood. Due to the growth targets and balance it provides, I prefer Alternative 1.

Thank you,

Linda Kaivola

## McCULLOUGH HILL LEARY, PS

April 7, 2011

VIA ELECTRONIC AND REGULAR MAIL

Seattle Department of Planning and Development  
 Attn: James Holmes, Senior Urban Planner  
 700 Fifth Ave., Suite 1900  
 P.O. Box 34019  
 Seattle, WA 98124-4019  
 Email: [southlakeunioneis@seattle.gov](mailto:southlakeunioneis@seattle.gov)

Re: Comments on Draft EIS, South Lake Union Height and Density Alternatives

Dear Mr. Holmes,

We are writing on behalf of the Boris V. Korry Testamentary Trust ("Korry Trust") to provide comments on the Draft Environmental Impact Statement ("Draft EIS") for the South Lake Union Height and Density Alternatives. The Korry Trust owns four properties located within the 8<sup>th</sup> Avenue Corridor at the intersection of Thomas Street and 8<sup>th</sup> Avenue North (Parcels 1991201080, 1991201085, 1991201095 and 1991201400) ("Korry Properties").

The Korry Trust supports the increased densities in the South Lake Union area discussed in the Draft EIS. The Draft EIS fails, however, to consider the practical and legal limitations that will prevent these densities from being realized on many properties, including the Korry Properties. The purpose of an EIS is to provide "the full disclosure of environmental information so that it can be considered during decision making." *Barrie v. Kitsap County*, 93 Wn.2d 843, 854, 613 P.2d 1148 (1980); *Mentor v. Kitsap County*, 22 Wn. App. 285, 291, 588 P.2d 1226 (1978) (An EIS should "serve to inform lawmakers of the environmental consequences of the proposal before them."). In order to support informed decision making by the City, the Draft EIS must be revised to identify these limitations and their consequences. The EIS must also consider alternatives that mitigate the impacts of these limitations on development capacity. WAC 197-11-400 (An EIS shall "inform decision makers and the public of reasonable alternatives . . . that would avoid or minimize adverse impacts or enhance environmental quality." (Emphasis added.)).

#### Minimum Lot Size

Alternatives 1-3 all assume that a minimum lot size of 22,000 square feet ("s.f.") for towers outside the shoreline area is necessary to ensure a maximum of two towers per block. Draft EIS, p. 1-5. This assumption is faulty and unreasonable because it fails to take into account divided property ownership within blocks, the existence of properties that are unlikely to develop due to their current use, and legal constraints on the development of landmark properties. For example, on the block containing the Korry Property, almost half the block is owned by the Denny Park Lutheran Church

and is unlikely to redevelop.<sup>1</sup> An additional parcel is occupied by a potentially eligible landmark structure.<sup>2</sup> The remaining five parcels are in three separate ownerships and total only 39,600 s.f., with less than 22,000 s.f. located on each side of the alley (21,600 s.f. in the contiguous three lots owned by Korry on 8<sup>th</sup> Avenue North, and 18,000 s.f. in the two lots in two ownerships on Dexter Avenue North).<sup>3</sup> Thus, on the block that includes the Korry Property, the 22,000 s.f. minimum lot size has the unintended consequence of limiting the number of towers to a maximum of one – in theory (assuming a large assemblage can be made and the alley vacated). In actuality, the imposition of this new minimum lot size requirement will motivate owners with properties totaling less than 22,000 to vest and develop under existing regulations, thwarting the City's goal of accommodating increased density in slender buildings. If owners do not develop under existing regulations, they will need to consolidate ownerships and obtain an alley vacation in order to develop even a single tower on this block. These limitations will likely result in delayed redevelopment and blighted conditions in the interim.

2 cont

The Draft EIS must clearly disclose the impacts of the 22,000 s.f. minimum lots size to development capacity on this and other similarly situated blocks. These impacts include the following:

- Land use. The minimum lot size results in a diminished ability to satisfy the City's goals of a dense vibrant mixed use community in the South Lake Union area.
- Housing. The minimum lot size increases the value of the properties able to be developed with a tower, thereby reducing housing affordability. The minimum lot size also decreases the supply of housing by limiting towers to one – or none – per block on some blocks.
- Aesthetics. The minimum lot size reduces the benefits achieved through the use of incentives, since fewer towers will be constructed than anticipated. In addition, the inability to construct more than one tower on a block is compounded by the extremely restrictive podium height in the 8<sup>th</sup> Avenue Corridor (ranging from 45 to 20 feet for Alternatives 1-3). The prospect of such a drastic downzone for "remnant" properties (the Korry Properties, at 21,600 s.f., would be a very large remnant) unable to be developed with towers makes it more likely that property owners will submit permit applications to vest to the current zoning regulations, resulting in buildings with bulkier profiles, the very result the new regulations are intended to avoid. In the alternative, remnant properties that are unable to develop under existing regulations will likely remain undeveloped under the extremely restrictive podium heights imposed on the 8<sup>th</sup> Avenue Corridor, resulting in deterioration and blight. In particular, this adverse impact to the environment surrounding Denny Park (one of the primary jewels of the South Lake Union area) would have far reaching negative

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<sup>1</sup> The church owns two lots totaling 3,240 s.f. The church property is also potentially eligible for landmark designation. Draft EIS, pp. 3.11-8-3.11.9. The Draft EIS acknowledges that properties owned by churches and landmark properties are unlikely to develop. Draft EIS, Appendix B, pp. 2-3.

<sup>2</sup> This is the Holly Press property. Draft EIS, pp. 3.11-8-3.11.9.

<sup>3</sup> Two of the lots are undersized due to their frontage on Dexter Avenue N.

consequences.

- Historic resources. The minimum lot size increases the development pressure on historic properties in blocks in which these properties are necessary to achieve the 22,000 s.f. minimum.

The Draft EIS does not meaningfully address these issues, as it fails to identify the current assemblages of less than 22,000 s.f., or the impediments to creating such assemblages. In order to inform decision makers of the consequences of their actions, the Draft EIS must perform a more fine-grained analysis of the development capacity of the South Lake Union area.

In addition to identifying the impacts identified above, the Draft EIS must identify reasonable alternatives to allow achievement of full development capacity, including a reduction in the minimum lot size, for blocks with development constraints.

#### Urban Design Framework

The Korry Properties are located at the corner of 8<sup>th</sup> Avenue N and Thomas Street and on 8<sup>th</sup> Avenue North just south of Thomas Street. The Final Urban Design Framework (December 2010) ("Framework") designates 8<sup>th</sup> Avenue North between John Street and Roy Street a "Woonerf Street." Framework, p. 12. These streets

substantially reduce auto capacity of a street to emphasize the pedestrian or bicycle user. They may be closed to all vehicles except deliveries or emergency vehicles. They may act as linear open spaces, utilizing the ROW for active or agricultural uses like P-Patches. These are primarily residential corridors, or areas where limited auto use is expected.

*Id.* Thomas Street is designated as a Green Street, which "are low intensity streets that prioritize pedestrian and bike mobility over automobiles." *Id.*

The Draft EIS fails to take into account the impact of these significant proposed restrictions on automobile movement. *See* Draft EIS, Figure 3.13-13 (Reasonably Foreseeable Transportation Improvements); Figure 3.13-15 (Pedestrian and Bicycle Improvements Not Assumed Under Future Conditions). Vehicular access to some properties may be precluded (one of the Korry Properties, for example, is developed with a parking lot that is accessed from a portion of 8<sup>th</sup> Avenue North proposed to be closed as a Woonerf Street).<sup>4</sup> The traffic that now travels on 8<sup>th</sup> Avenue North will be diverted to other streets. These proposals are significant and should have been analyzed in the Draft EIS. The nontraditional traffic analysis methodology employed by the Draft EIS fails to take these street modifications into account and does not adequately analyze the traffic impacts of

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<sup>4</sup> This parcel is sandwiched between properties housing newly developed low income housing, which is unlikely to be redeveloped, and a church, which is either unlikely to be developed or, if developed, already exceeds the 22,000 s.f. threshold. As a result, the Korry parking lot parcel is extremely unlikely to be included in a larger assemblage totaling more than 22,000 s.f. The drastically reduced height limit for this property, combined with the restricted vehicular access, will deprive it of all reasonable economic use.

2 cont

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James Holmes  
April 7, 2011  
Page 4 of 4

increased density, particularly in the absence of significantly increased public transportation. Absent environmental review of these street modification proposals, they cannot be implemented by the City.

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Thank you for your consideration of these comments.

Sincerely,



Courtney A. Kaylor

CAK:ldc

**Holmes, Jim**

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**From:** James Kelly  
**Sent:** Wednesday, April 06, 2011 6:35 AM  
**To:** DPD\_Planning\_Division  
**Subject:** South Lake Union

Dear Members of Seattle Department of Planning and Development:

Here are responses that I think are workable, preserve multiple use functions of SLU and have the potential of adding dignity and uniqueness to the SLU.

1. It is important for the future development to plan for influx of families. Planning for schools, families and playgrounds defines multiple uses.
2. Preserve visual access to the Lake itself to preserve the views of the Lake which marks the identity of SLU. Without views and access to the Lake the meaning of SLU as a neighborhood is compromised.
3. Plan for Mass Transit to reduce traffic congestion created by any possible increase in automobile traffic which further decreases pedestrian access and presence.
4. Restrict the building of towers adjacent to the Lake which destroys the access and meaning of being apart of a South Lake Union community.
5. For present buildings and future planned buildings consider the impacts of building height and density upon views.
6. Maintain current zoning in the Cascade area, including the blocks between Fairview and Minor. This area already has developed it own character.
7. Preserve the concept of step down to the Lake itself to retain visual access of the Lake; a quality that preserves the individuality and uniqueness of the SLU.
8. Alternatives #1 and # 2 destroy the concept of multiple use housing AND deprive SLU of its uniqueness by removing pedestrian and visual access to the Lake itself AND produce unacceptable traffic congestion These are regressive proposals for a genuine SLU.
9. A Step Down concept for any new building is essential to preserve what has been promoted as a unique means of multiple uses and community identity.

Thanks for listening!. I do hope the above comments and recommendations can be viewed as practical, reasonable and all in the spirit of defining fair and user friendly concepts of SLU as a unique, vibrant and multiple use community that can accommodate to diverse interests.

James G. Kelly

Holmes, Jim

From: Kenny, Daniel  
Sent: Monday, April 11, 2011 9:23 AM  
To: DPD\_Planning\_Division  
Cc: kennydaniel@gmail.com  
Subject: South Lake Union Height and Density Draft Environmental Impact Statement -- COMMENT

April 11, 2011

James Holmes  
Seattle Department of Planning and Development PO Box 34019 Seattle, WA 98124-4019

Dear Mr. Holmes,

I am writing to comment on the South Lake Union Height and Density Draft Environmental Impact Statement.

I am a 28 year old law student who grew up in Seattle. I left the city to attend college in California and stayed to work both in Los Angeles and San Francisco. My two years working in San Francisco opened my eyes to the many benefits of in-city living. San Francisco has a culture where everyone walks, takes public transit, and enjoys the amenities of in-city life. When I moved back to Seattle for school the contrast was shocking. Seattle needs more in-city communities for young and active people.

People like myself value being close to those things we want in our daily lives. We want to walk or take the bus to work to avoid parking costs, restaurants round the corner, vibrant and cutting-edge employers in the area and, we want nightlife, museums, and the arts at our finger tips. Finally, we are not willing to live outside the city in order to be in a home. We are content living in condos within the communities that offer the amenities we desire.

Alternative 1 within the South Lake Union Height and Density Draft Environmental Impact Statement helps to make Seattle a place where all these things can happen.

In looking at the options within the city to make these types of changes, South Lake Union is the obvious choice for three reasons.

1. South Lake Union is in a valley of sorts which means the increased heights can be permitted without making it seem like downtown is expanding north. These height increases should not hinder the needed development and revitalization of the area. The increases allow for multi-use development that will maximize the potential of the neighborhood.
2. The area already has some of the most dynamic and progressive employers located there and the changes would only attract more. If the area gets the jobs the rest will follow.
3. The South Lake Union area is an integral part of the city and if built up properly it could connect Queen Anne, Capital Hill, East Lake, and Downtown to the South Lake Union area to form a walkable and vibrant in-city network of neighborhoods. This is exactly what Seattle needs to be attractive to young professionals like myself.

I ask that the city approve the Environmental Impact Statement and adopt Alternative 1 because the city needs it. This is an amazing way to ensure that Seattle is a desirable place for companies to make their home and for young professionals to live and take advantage of in-city amenities.

Sincerely,

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Daniel Kenny  
Seattle University School of Law

Sent via email to: southlakeunioneis@seattle.gov

April 11, 2011

James Holmes  
Seattle Department of  
Planning and Development  
PO Box 34019  
Seattle, WA 98124-4019

Re: South Lake Union Height and Density Draft EIS – Support for Alternative 1

Dear Mr. Holmes,

I am writing to comment on the South Lake Union Height and Density Draft EIS. I am a Denny Triangle business owner whose office overlooks South Lake Union. And before moving to our current office we ran a business for many years in the South Lake Union neighborhood, itself.

I strongly encourage adoption of Alternative 1 – and failing that, Alternative 2. I oppose Alternatives 3 and 4 and urge that those options not be selected.

I'm writing as someone who supported and worked for The Commons bond issue back in the 90's. Long before that, my wife and I actively supported the three Farmland Preservation bond issue efforts in 1978 and 1979.

I mention my support of King County's Farmland Preservation Program because I strongly believe there is a direct link between preserving open space and accepting designated areas of urban density. The Seattle-King County region needs to grow and will continue to grow – that's a given. The question becomes: where best and how best to locate urban density.

The City's designation of the South Lake Union neighborhood as an Urban Center largely answers the question, "where." And to my thinking, SLU is an excellent choice. Lake Union, itself, is an incredible (and, so far, under-used) amenity. And even without The Commons, Lake Union Park, South Lake Union Wharf, and the ongoing redevelopment of the neighborhood make SLU a compelling focus for combined commercial and residential development.

The four distinct alternatives laid out in the Draft EIS go to the question of "how" increased density will be pursued in the SLU neighborhood. In my judgment, Alternative 1 – and, to a lesser extent, Alternative 2 – best meets the goal of creating a vibrant urban community.

Alternative 3 or 4, on the other hand, would each represent a half-way measure that would fall short of doing what designation of SLU as an Urban Center sets out to do.

| 1 cont

I am not an urban planner – far from it. But I appreciate the concept of critical mass. It seems clear that a vibrant urban neighborhood depends on density for thriving businesses, job creation, proximity of jobs to homes, and so on. Portland, San Francisco, and Vancouver B.C. all boast high-quality-of-life, walk-to-downtown, urban neighborhoods. Approving Alternative 1 will insure that Seattle’s South Lake Union neighborhood develops along that same model.

I strongly urge the City to approve the draft EIS with height limitations and development density consistent with creating as many new jobs and residential units in the South Lake Union neighborhood as practical.

Sincerely,

Dennis E. Kenny

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Holmes, Jim

From: Diane Kenny  
Sent: Monday, April 11, 2011 9:09 AM  
To: DPD\_Planning\_Division  
Subject: SLU Height & Density EIS

Attn: James Holmes

Please accept this email as comments on the SLU Height & Density EIS, specifically supporting Alternative # 1. I am a lifetime Seattle resident, with strong connections to the SLU community for over 50 years. My family had an ownership interest during the 1960's in Washington Athletic, located at 1123 Valley Street. That interest evolved during the 1970's to Athletic Supply located on Westlake Avenue – in both instances my father was an athletic salesman, and I spent a fair amount of time in both businesses.

1

In 1989 my husband and I started our own business in healthcare communications, and after 10 years downtown, relocated to 426 Yale Avenue North. We then moved in 2005 to the Denny Building at 2200 Sixth Avenue. So during most of my 62 years I have had a fairly direct contact with SLU and its immediate environment. Needless to say, since the 1960's I have viewed many changes in the area. While I was in favor of The Commons effort many years back, and still wish that had gone forward, I view positively the growth and development that has occurred in the area, in particular the fabulous South Lake Park ! As a former staffer for Councilwoman Phyllis Lamphere, I applaud her leadership on that public/private effort.

I am not afraid of change, and I am not afraid of density and height. The energy challenges confronting our country and community at this time require that we become much more creative with efficiency opportunities. We need to get out of cars and embrace public transportation and our feet/legs. We encourage our employees to use Metro by reimbursing them for ORCA cards; we encourage our employees to get out of the office and move around in the neighborhood, taking walking breaks; all of us frequent Whole Foods at some point during the week for some shopping – the exciting changes in the SLU neighborhood make it easier for us an employer to encourage healthy commuting and lifestyle behaviors among our employees. And we are comfortable encouraging these behaviors because we view a populated, busy neighborhood as a safer neighborhood.

We just renewed our lease for another 5 years, looking forward to what evolves in our community, which we hope will include more people, more opportunities to connect with one another, and a vibrant urban connection between Lake Union and the downtown core.

Thanks for your work on this important effort.

**Diane Kenny**  
Vice President

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IlluminAge Communication Partners

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*Communications professionals dedicated to serving clients in aging services and health care.*

South Lake Union DEIS Testimony

Mike Kent

Thank you for the opportunity to testify. I am an urban planner, Director of Kent Planning Solutions, and an actively engaged resident of Capitol Hill.

Seattle has the potential to become a model for sustainable urban development, and few neighborhoods are more central to Seattle's growth – both literally and figuratively – than South Lake Union. Therefore, we must seize every opportunity to make it the vibrant neighborhood it has the promise to be. In order for the neighborhood to reach its full potential, the City must allow South Lake Union to absorb higher density, mixed-use development, as is studied in the DEIS. The benefits of a future rezoning will extend well beyond South Lake Union's borders, positively impacting the entire city and Puget Sound region.

Encouraging higher-density development in South Lake Union is among the most beneficial measures the City can take as it aspires to become increasingly pedestrian-, bicycle- and transit-focused. In order to limit suburban sprawl, we must concentrate housing and jobs in our highly walkable urban core. South Lake Union presents an unmistakable opportunity to accommodate this new development, as it is located within walking distance of Downtown and more established neighborhoods like Queen Anne and Capitol Hill. Furthermore, both public and private investments have already enhanced the neighborhood's viability as a hub for housing and job growth, from the South Lake Union Streetcar, to the new Amazon headquarters, to Lake Union Park; we cannot afford to squander this opportunity.

The impacts identified in the DEIS are largely positive. The Puget Sound Regional Council forecasts 1.7 million new residents in the region by 2040, and under Alternative 1, South Lake Union could accommodate 21,000 new housing units. We must not sell this opportunity short. I look forward to the day when high-rise development extends north from Downtown through South Lake Union, enhancing our city's already remarkable skyline. Finally, a future rezoning would positively impact transportation conditions, bringing more Seattleites within walking distance of jobs, retail, parks, and other destinations. Moving forward, the City must continue to provide necessary public infrastructure, from police and fire protection, to schools, to road and sewer upgrades.

Thank you again for the opportunity to testify.



April 7, 2011

Mr. Jim Holmes  
City of Seattle  
Department of Planning and Development  
700 Fifth Ave, Suite 2000  
Seattle, WA 98124-4019

Dear Mr. Holmes,

At Kinzer, we consult to and represent many of the region's strongest and fastest growing tenants to identify creative real estate solutions for their business needs. Representative clients include Seattle Children's, Fred Hutchinson Cancer Research Center, Bill & Melinda Gates Foundation, and Russell Investments.

Over the past few years, we have witnessed a trend among life sciences, high tech and global health biotech tenants who are looking for larger floorplates for their office and research and development programs. This seems to be driven by increased interdisciplinary work and more intense collaboration and innovation among high-growth companies. Larger floorplates can also reduce cost of already high cost of construction due to efficiencies in ventilation systems and shared services supporting larger lab modules. Ideal floorplates for the industry are generally in the 30,000-40,000 range.

We have noticed that the South Lake Union Draft EIS does not reflect this trend, limiting office floorplates to 24,000SF in an area of the city that seems otherwise destined to take a disproportionate amount of technology and biotechnology job growth.

We would strongly encourage the final EIS to look at larger floorplates in the 35,000-40,000 SF range. This would preserve the opportunity to zone South Lake Union in a way that is consistent with the needs of its "growth engine" tenants.

Best Regards,

A handwritten signature in black ink, appearing to read "Craig Kinzer".

Craig Kinzer  
Principal

A handwritten signature in black ink, appearing to read "Kris Richey".

Kris Richey  
Vice President

## Holmes, Jim

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**From:** Kris Richey  
**Sent:** Thursday, April 07, 2011 4:13 PM  
**To:** Holmes, Jim  
**Cc:** DPD\_Planning\_Division; Sugimura, Diane; Conlin, Richard; Rasmussen, Tom; Bagshaw, Sally; Burgess, Tim; Godden, Jean; Clark, Sally; Licata, Nick; Harrell, Bruce; McGinn, Michael Patrick; Craig Kinzer  
**Subject:** Support the Alt 1 Rezone in South Lake Union with 35,000SF Technology Office Floorplates  
**Attachments:** Letter to Jim Holmes regarding SLU rezone 4.4.11.doc

April 7, 2011

Mr. Jim Holmes  
City of Seattle  
Department of Planning and Development  
700 Fifth Ave, Suite 2000  
Seattle, WA 98124-4019

Dear Mr. Holmes,

At Kinzer, we consult to and represent many of the region's strongest and fastest growing tenants to identify creative real estate solutions for their business needs. Representative clients include Seattle Children's, Fred Hutchinson Cancer Research Center, Bill & Melinda Gates Foundation, and Russell Investments.

Over the past few years, we have witnessed a trend among life sciences, high tech and global health biotech tenants who are looking for larger floorplates for their office and research and development programs. This seems to be driven by increased interdisciplinary work and more intense collaboration and innovation among high-growth companies. Larger floorplates can also reduce cost of already high cost of construction due to efficiencies in ventilation systems and shared services supporting larger lab modules. Ideal floorplates for the industry are generally in the 30,000-40,000 range.

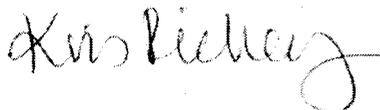
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We would strongly encourage the final EIS to look at larger floorplates in the 35,000-40,000 SF range. This would preserve the opportunity to zone South Lake Union in a way that is consistent with the needs of its "growth engine" tenants.

Best Regards,



Craig Kinzer



Kris Richey

**Holmes, Jim**

---

**From:** Terri Kitto  
**Sent:** Monday, April 11, 2011 10:11 PM  
**To:** DPD\_Planning\_Division  
**Subject:** EIS comment

Re: South Lake Union EIS

Very simply put, I truly believe that urban density is the way to provide for growth in an environmentally responsible way. I support greater building heights in South Lake Union as the best way to make that happen. | 1

Thank you for the opportunity to provide input.  
Terri Kitto

Comment on South Lake Union EIS Public Hearing 3-28-11

As the owner of property developed into a live/work condo on Yale Ave N (3 blocks north of REI) and an attendee of numerous planning meetings, it seems like there is a massive push to build tall. 1

We conformed to our zoning designation and there were many opportunities for the Planning Department to accommodate and be flexible – but there was no flexibility. Now we hear that there has been an ongoing plan to increase building heights in all of South Lake Union, including the Cascade area. We went through all the required processes and think that the Cascade area should remain at the present zoning.

Another troubling trend is the granting of more height for more social services located in the area – like drunk housing, delinquent youth services, etc. So for increased blockage of sun and views, we get more graffiti and vagrants sleeping, urinating, and trashing everywhere. That does NOT make our neighborhood more desirable or safe.

Basically we want to live, work and play in a clean, light and safe environment, not at the bottom of a canyon spawned by new zoning.

Keep the existing zoning in the Cascade area.

Thank you,

Jack Kleinart

During the 2011 South Lake Union Environmental Impact Statement Public Hearing on March 28, the room seemed stacked full of people with a vested interest in maximum height and density growth. From union workers to real estate sellers, developers, builders, urban designers, architects, planners, and property owners, they lined up to speak in support of the economic benefits of 'going the max'.

1

Their perspective is understandable, if predictable, but that doesn't mean that they represent the feelings of the residents who actually live and work in the area. One reason for the lack of comment from homeowners can be attributed to the over abundance of renters currently living in South Lake Union, especially in the Cascade area. In many cases, this is a temporary economic solution to the development of housing in a down market, and there are hopes for attracting many future owners.

The frenzy of interest and fast growth potential in this area has presented the City with a rare opportunity and duty to direct and orchestrate the type of expansion in South Lake Union that will have a much more lasting impact on the livability, desirability, and ultimate viability of this area than short term individual gains.

2

To revitalize city living, think about the people you want to attract, then design for them. Study the successes and failures of other cities. Don't obscure what makes this particular area of the city unique. Determine how it can be expanded in the most elegant way while retaining the natural beauty that makes Seattle famous. These simple parameters should drive the process.

Regarding the seaplane flight paths, I didn't see or hear any mention of the landings having been studied, only take offs. As an owner of a live work condo (designed by Tom Kundig) on Yale Ave N, I face west and watch the daily seaplane approaches to landing, as they fly north. Planes descend steeply over the Cascade neighborhood before landing on the lake, and this will have a critical impact on heights and needs to be studied carefully.

3

My vote is for Alternative 3, but in any scenario to keep the existing zoning in the Cascade area unchanged. It's the oldest residential neighborhood in South Lake Union and draws more families. Yale Avenue North is planned as a walking corridor of retail activity, so the lower heights and density will enhance pedestrian quality at the street level by allowing more light, air and view. With its park, schools, churches, and sloping terrain, the Cascade neighborhood is more 'urban rural' and acts as a transition buffer between areas of greater height and density. It needs to retain the people friendly feeling of open space, and development should scale down toward the lake from all directions.

4

Thank you,

Layne Kleinart

206-362-0286  
jacklayne@webtv.net

**Holmes, Jim**

---

**From:** Ben Koshy  
**Sent:** Monday, April 11, 2011 4:41 PM  
**To:** DPD\_Planning\_Division  
**Subject:** SLU EIS Comments

The South lake Union Revitalization effort has brought about many jobs and new businesses. The environment is urban chic with new condos and modern office buildings. Heightened zoning will allow for a higher density while still preserving views due to smaller floor-plate design. Additionally, the "Live/Work/Play" environment in SLU will foster more controlled growth in the area and its surrounding businesses. Rather than have townhomes appear everywhere in the surrounding areas, South Lake Union can become a vibrant community filled with new bars, restaurants, boutique shops, and recreational centers to accompany Seattle's legacy businesses and biotech/non-profit ventures. 1

Frontier  Renewal

April 11, 2011

Seattle Department of Planning and Development  
 Attn: James Holmes  
 700 Fifth Ave., Suite 1900  
 P.O. Box 34019  
 Seattle, WA 98124-4019  
 southlakeunioneis@seattle.gov

RE: South Lake Union Height and Density Draft Environmental Impact Statement (DEIS)

Dear Mr. Holmes;

We have an interest in property that is located in the area identified as the Dexter sub district and would like to offer comments on the draft Environmental Impact Statement dated February 24, 2011. We support increasing the height and density in the South Lake Union area, agree with the stated objectives in the introduction to the Environmental Study and favor Alternative 1 which provides the greatest potential density. Our comments pertain to the detail of the study and the alternatives. Presented below are our comments and concerns:

1. Podium Height: Podium heights vary with the alternatives but are generally a maximum of 45 feet. **Some flexibility with podium heights should be allowed through the design review process given the variety of lot conditions and slopes. Perhaps allow some areas to go higher by averaging.** | 1
2. Floor Plate Size – Commercial: 24,000 SF is not large enough for many users that would consider locating in South Lake Union. The biotech companies particularly generally need larger floor plates to accommodate the infrastructure and core space required to support the laboratory environments. **Please consider increasing commercial floor plate maximums to 35,000 SF.** | 2
3. Lake Union Seaport Airport Flight Path: The Land Use section includes plans, policies and regulations for limiting the height of buildings within the FAA flight path; however the description of the flight path and required heights has not been determined. **This is a huge issue for effected properties and should be defined, vetted and presented to the public for comments prior to publishing the final EIS.** | 3
4. Geology and Soils Mitigation: Mitigation Strategies state that there might be site –specific measures to deal with geology and soils impacts, which may include reducing the size of the project. **With the current technology available to solve geology and soils issues, there would be no reason to require reduction in the allowed building envelope.** It is up to the owner or developer to determine if it is worth the cost to implement necessary technology and earth science solutions. | 4
5. Above grade parking: We agree with the provision allowing parking to be half above grade and half below grade. **Many if not most of the properties in South Lake Union have water table issues and the necessary parking for the various uses cannot be accommodated below grade only.** | 5

Seattle Department of Planning and Development

Attn: James Holmes

April 11, 2011

Thank you for the opportunity to participate and share or comments. We would appreciate your consideration of our comments as you move forward with the process.

Frontier  Renewal

Sincerely,



Jeff Kroll  
Vice President  
Frontier Renewal LLC

King, Donna

From: Martin Kushmerick [kushmeri@u.washington.edu]
Sent: Sunday, April 10, 2011 2:13 PM
To: DPD\_Planning\_Division
Subject: Draft EIS

Dear Mr. Jim Holmes

I live in the cascade neighborhood and walk to and from my office at UW SLU campus. I spoke at the public hearing on March 28th and wanted to make several additional points.

Citizens of Seattle and City Council realize that the blocks around Lake Union are special - the area is iconic Seattle Water. Our part of the city has a very special feel. For me maintaining this environment while developing as an urban center means maintaining visual access of spectacular views of the mountains and Seattle Center to the west, to Lake Union to the north and to the slope of apartments to the east. Growth rate in SLU is projected to be TWICE that in downtown and to be almost THREE times current density by 2031, and significantly larger than any other area in the city of Seattle. I believe growth of this magnitude within current planning is neither realistic nor desirable for SLU. The sole reason is to drive the highest density planning and developer's building needs. I respectfully ask is this really what City Council intended. Does it really want this uniquely high growth rate for his very special part of the city?

In order to proceed in a more optimal manner toward the irresistible growth in SLU, I raise four points that are not addressed in the current planning and were not discussed much at the meeting.

1. SLU will become a high-density urban center with a substantial population living within or near SLU, unless city planning reverses the current course. That planning necessarily includes local businesses and offices, high-rise apartments and condos, parking, transportation and living amenities as coffee shops, restaurants and the like. However if Seattle Council is serious about people living within SLU, the current planning will be suitable only for singles, seniors, DINKS (double income, no kids) or commuting executives. Folks planning on having children will necessarily have to move out as their child outgrows preschool; this includes not only the highly paid but especially most of the workers, clerks, coffee servers. A grammar school is essential for this purpose within a reasonable distance, if not within SLU boundaries then close. Playgrounds, grocery stores, post office, banks and other essential supports for family living are needed. None of this thinking or evaluation is included in current alternatives #1, #2 or #3. If city planners mean to make SLU like the human-sterile downtown business corridors, at least have the honesty to say so. Assuming city planners mean what they say, much more than considerations of resident density and height of high-rise pencils on top of 3 - 5 story pedestals needs to be analyzed and discussed.

2. Transportation is a problem currently. Page 443ff of EIS gives mitigation strategies that are applicable to all current growth plans. Alternative #1 states it offers the least impact; apparently it assumes most people who work in SLU will actually live in the newly built residential units and walk to work. Apparently that assumption is the only way to achieve the very high growth rate without transportation gridlock. This assumption is not realistic as discussed in my first point if minimal amenities for families are absent. Furthermore if realistic, no current plan offers the necessary support for residential living, as grocery stores, parks for their children, schools, post-office, library, etc. Therefore the highest density planned by alternatives #1 and #2 I believe is not what City Council envisioned and these plans are inconsistent with the living goals and life style stated above.

3. We need to consider esthetics early on; it is virtually absent now. So far discussion is focused on buildings, how high and how many. I strongly believe that these issues come AFTER a general plan for the area is in place. At the Public Hearing, how high and how many were virtually the only matters that concerned builders and business people, and the arguments were couched that we have either growth or stagnation. The sentiment expressed by a few that nothing should be build is not a realistic plan. So please move beyond that simplistic dichotomy to sensible and realistic assessment and planning for people living in SLU. What should the region look like when built out in a decade, two and more decades after that? Density of residents has been answered in part: housing density should double by 2024 and triple by 2031. Obviously a number of high-rise condos are needed to reach those density targets; but these should not be located without a lot of thinking about esthetics and livability with respect to the other human needs discussed above, parks, green spaces and views.

All current plans place more or fewer high rises scattered throughout to meet the density goals. A planned urban center with jobs, workspaces and living spaces for upwards of triple the current living density needs more planning and analysis than the number and maximal height of high-rises. Locations of living amenities, low and middle income housing, green areas, parks, etc need to be considered early, not as an after thought. Look at the SLU area from Gas Works Park. One sees a spectacular lake with the land rising gradually more or less as a bowl on the south, east and to some extent on the west. Surely 2 to 3-fold higher density of living is compatible with a plan of step-up heights along the center line from the south shore to downtown, and similarly spreading east and west from the center line. This would create a spectacular scene and likely propel Seattle into the ranks of extremely well planned and designed cities. One need not discard the planning for the various alternatives. Significant rearrangements are essential if we are to avoid a faceless and feature-less urban center. If this type of broad esthetic planning is done, I imaging property values of residential units, presumably within and along the edges of the bowl-design for SLU will rise because of exquisite vistas in all directions. My last point will only enhance this goal.

4. Consistent with the preceding, I suggest that the several blocks currently empty due to construction and rerouting of Mercer and Valley be converted into parks, Patches, ball fields and playgrounds, i.e. totally for comfort, pleasure and recreation of the population. The need is extraordinary; more than 180 are on the waiting list for plots in the Cascade PPatch. This would extend the current SLU park and make this area a dramatic focal point for the entire region offering essential human amenities. Obviously one can imagine the objections, even screams, from developers of the very special and certainly very expensive high rises planned in alternative #1. I suspect a clear initiative from City Council along the lines I suggest here will draw virtually total support of the Seattle populace and certainly of the SLU residents. We need another substantial park area in SLU besides the Cascade and Denny parks. Small green areas amidst Amazon and UW Medicine buildings are nice touches but not anywhere near sufficient. Let's creatively design a public campaign to secure this land from Allen Enterprises. I have not forgotten and I hope city planners have not forgotten about the vision put forward by Paul Allen years ago and voted down, for a green vista and boulevard of sorts from the south short of Lake Union to Westlake center. While this is obviously not possible now, I suggest the essence of this concept can be accomplished if some sense of esthetics and planning for a population living within SLU is incorporated, as discussed here and above.

I hope my comments help this process. I follow myh resolution for 2011 below. Sincerely

Marty Kushmerick

Martin Kushmerick, MD, PhD

kushmeri@u.washington.edu  
206 543 3762

Professor Emeritus of Radiology and Physiology&Biophysics University of Washington School of  
Medicine Translational Center for Metabolic Imaging Brotman 142 Box 358050  
815 Mercer Street  
Seattle, WA 98109-4714

Resolution for 2011: May evidence-based policy triumph over policy-based evidence. (R.  
Schenkel, Science 330, 1749, 2010)

Patricia Kushmerick, SLU Resident

10 April 2011

South Lake Union (SLU) has a potential for housing and business far greater than currently exists. There is much undeveloped land. **My expectation is that such growth will enhance not detract from the uniqueness that is SLU.**

1

**Lake Union Access and Views**

2

- Lake Union is a “Seattleites” Lake. The only way to provide real lake access for the multitudes is by preserving access and views. **I am most distressed** by the part of the alternatives that include towers just across from SLU Park between Valley Avenue and Mercer Street. What can be more off putting? Lake Union belongs to all of us, not just those in the towers. The inevitable barrier that towers and pedestals create will have a negative impact on Lake Union access and views.
- From the southern border of SLU (Denny Way) to the lake Mother Nature has created a cascade lending itself to a grand approach. This visual effect will be lost by Alternatives #1, #2, #3 because there is no step down appearance.
  - Alternative #1 devastates its potential step down with the 300 ft. height proposed at the lake.
  - Alternative #2 has no cascading step down and towers.
  - Alternative #3 makes the best attempt but not a real step down **and** 125 ft towers (12 stories) between Mercer and Valley creates the barrier referred to above.

**Affordable living for several income levels:**

3

- I know that the income created by incentive zoning is targeted for affordable housing. As worthy as is this cause and need, as a skeptic, it seems to me that this justification is an example of Seattle Officials deciding that height and density is what they want and this rationale will be accepted by the populace “who is against helping everyone have a roof over his/her head”?
- If the City Fathers and Mothers really meant this commitment to affordable housing within SLU, they would not have allowed Amazon to get off so cheaply. The \$5M or so that Amazon paid to “build up” is pocket change for Amazon. If the city was serious the cost to Amazon would have been significantly greater and should have included mandatory constructed affordable housing dwellings within SLU. To my knowledge there is no stipulation where the affordable housing units will be constructed.

Patricia Kushmerick, SLU Resident

10 April 2011

- On the topic of Affordable Housing I see only lip service by the DPD. With the proposed heights, construction consistent with affordable houses is excluded. Building the heights proposed require expensive construction costs which precludes “affordable” sales or rental options. Will developers assign a number of their tower condos as affordable housing? I don’t think so.

4

**Family Livability**

- **Affordable housing is not equivalent to affordable living unless it is planned for.** From what I have read I conclude that this urban center will realistically only be populated with well to do singles, DINKs, seniors and commuters. Although these groups are valuable components of a community, no neighborhood is complete without children of all ages and backgrounds. Few of those who will be employed will be the high income employees (able to afford these expensive condos). Many employees will receive middle and lower incomes. Thus without affordable housing such employees will be forced to become commuters ending the expectation of a diverse community with minimal auto commuters. Perhaps wealthy individuals employed far from SLU will move to the condos and auto commute to work.
- What is missing from this EIS is the **non revenue producing** components of family life that includes **at a minimum** grammar and middle schools, a library, sufficient safety services and recreation areas, community spaces, improved public transportation, walkability and economical grocery shopping (Whole Foods does not meet that criteria).
- Currently SLU is limited to one **Pea Patch**. No where in this EIS did I find mention of additional Pea Patch opportunities. Even with the current population there is a long wait (years) for a patch. This lack also impacts the interest of families to settle here for the long term.
- Towers will shade the P-patches; veggies and flowers don’t do well in shade. Mother Nature provides more than ample shade; let us not block the sunshine that we get.
- Without the above components to foster family living, SLU will never meet the expectations of the developers, city planners or business investors.

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8

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**Residents or commuters?**

- It is a nice fantasy to imagine that people will live/work/play within SLU and travel on foot, bike or public transportation. The supposition that there

10

Patricia Kushmerick, SLU Resident

10 April 2011

will be limited out of area auto commuters living in SLU is perhaps wishful thinking. Current traffic across our floating bridges in **both directions** primarily at rush hours belies that dream. People don't necessarily choose to live and work on the same side of a bridge. If this population plan is premised on changing that pattern the results can be financially disastrous.

10 cont

**Population:**

- Creating the expectation of the 2030 target is unduly burdensome to this neighborhood and particularly unpalatable because it is so disproportional to the other Seattle Urban Centers.

11

**Cascade Neighborhood West Boundary:**

- The Cascade Neighborhood is a unique area within all of SLU. The current zoning should be kept. In addition, to keep the current west border with heights extended potentially to as much as 240 ft mid block makes little sense. **I urge you to move the west border of the Cascade Neighborhood 1/2 block west to the west side of Fairview Avenue N.**

12

**Infrastructure:**

- There is little opportunity to increase bus transport. The EIS refers to multiple bus lines. This is at best an exaggeration since some of the lines referred to travel on Aurora. Aurora is hardly the heart of SLU.
- There is not adequate provision for auto traffic and parking.
- The anticipated increase in businesses truck traffic on which Alternatives #1 & #2 are premised, will present an undue amount of traffic and noise. EIS statements to the contrary, I live in SLU and I am aware of the traffic impact created by Amazon.

13

**In Conclusion:**

Alternatives #1 and #2 will:

- Change the character of SLU such that our crown jewel will lose its special place in the hearts of the citizenry and appeal to visitors.
- Create a childless neighborhood
- Have unacceptable traffic congestion

14

Patricia Kushmerick, SLU Resident

10 April 2011

- Not be a location for citizens of all economic levels which will automatically add many commuters to the community and deprive the community of diversity.

14 cont

**I urge the DPD to:**

- Maintain the growth population to the 2021 target
- Reject Alternatives #1 and #2
- Modify Alternative #3 **to at a minimum:**
  - Omit towers at Lake Union and keep the current zoning height (40 ft) north of Mercer Street
  - Move the west boundary of the Cascade Neighborhood to the west side of Fairview Avenue N
  - Include in the planning requirements that SLU have:
    - \*Assured affordable housing
    - \*Neighborhood public schools
    - \*A library
    - \*Additional play grounds, fields, Pea patches, Community Centers
    - \*A post office
    - \*Walkability in a neighborhood that is not encumbered by heavy traffic that brings with it increased pollution and unacceptable noise.

**King, Donna**

---

**From:** Sylvain Langrand [sylvainlangrand@live.com]  
**Sent:** Sunday, April 10, 2011 9:59 AM  
**To:** DPD\_Planning\_Division  
**Subject:** South LAke Union EIS proposal - please read - No to Alternative 1 & 2

**Importance:** High

Hi,

I'm a current resident at the Live 2200 residence (2200 Westlake), have happily lived there for 3.5 years and was recently made aware of the new South Lake Union development plans.

I would like to share with you my strong concerns about the current plans allowing 300 - 400 foot buildings that will negatively impact the quality of life of this great new neighborhood (i.e. Denny already completely saturated today traffic wise).

I love the development made on Westlake avenue and would encourage the city planners to limit all structures of this new neighborhood to 5-6 story high structures. I don't believe extending the downtown high-rises will improve the quality of life in South Lake union but creating a unique new beautiful neighborhood will.

I urge you to not consider alternative 1 & 2 and would encourage you to consider alternative #3. I believe option 3 will allow great growth in density, activity, visual attractiveness and quality of life of all current residents making South Lake Union a unique, beautiful, clean and "must live-in" neighborhood.

Thank you for your consideration

Sylvain Langrand

1

April 8, 2011

Seattle Department of Planning and Development

Attn: James Holmes

700 Fifth Ave., Suite 1900

P.O. Box 34019

Seattle, WA 98124-4019

Dear Mr. Holmes:

I am writing in support of additional height and density in South Lake Union. As a business owner (South Lake Union Dentistry) and resident (the 2200 Westlake complex) my opinion is that increased height and density is good for a neighborhood adjacent to a dense urban core. Often people gravitate to areas rich in urban amenities, and then become an opposing voice for further growth once they arrive. I felt it important to voice my opinion to tell those of influence that the "not in my back yard" set does not accurately represent all residents here.

This area I call my home is gaining in vibrancy, but it has yet to reach that ideal which causes pride and loyalty to place. When I moved here 3 years ago I chose to get rid of my car. Nervous at first, I quickly learned that it is a better life. Access to car sharing, along with a lot more walking, has made life easier and healthier. The car culture of other cities separates people and removes a fondness of place. When people covet living in an interesting environment, employers follow. It's easy to recruit talent when the location sells itself in desirability.

Seattle is a growth city of the future. We have an enviable opportunity to dictate our trajectory with a clean slate. Lets make sure we align ourselves with forward thinking urban centers for future generations, not with the car culture of past generations. We live differently now.

Sincerely,  
Brian R. Larsen

2115 WESTLAKE AVENUE  
SEATTLE, WASHINGTON 98121  
206 623 3143 TELEPHONE  
206 623 0270 FAX  
southlakeuniondentistry.com

BRIAN R.W. LARSEN, D.D.S., P.S.

March 27, 2011

Seattle Department of Planning & Development  
Attn: James Holmes

Mr. Holmes,

I am writing you today to share my thoughts about the possibility of rezoning the South Lake Union area of Seattle. During recent visits with friends who live and work in the area, I have seen amazing changes to what was previously sort of a drab and somewhat forgettable part of Seattle. There are more restaurants, coffee shops, boutique store and galleries which really showcase the revitalization of this portion of the city. The addition of the Streetcar and wider, pedestrian-friendly sidewalks has made it so much easier to get around and visit all the new businesses. I love Seattle and am pleased to see the community involvement this has inspired. I see people taking pride in where they live and wanting to become a part of the exciting things that are happening.

It has recently come to my attention that there is some feeling that supporting an upzone allowing additional vertical development, such as condo and/or apartment towers, will negatively impact the area. I believe that it will be exactly the opposite. By allowing taller buildings, we would be essentially creating more usable, workable space in a smaller area with an equally smaller footprint. Taking advantage of this opportunity to create additional housing, office, and businesses will result in attracting more people to the area. The addition of these people will also help to fully utilize the wealth of existing parks and open spaces that are currently, in my opinion, being under-used.

I also feel that bringing folks into this kind of environment will encourage a healthier lifestyle, which is so important in this day and age. If people are within walking, biking, or even a short streetcar ride to their destination, they will be much more likely to utilize that mode of transportation. More walking and riding means less cars on the road, which leads to a greener and more environmentally-friendly way of living.

As a caring citizen, I am writing to encourage the City to adopt Alternative 1 of the proposed rezone of the South Lake Union area of Seattle.

Thank you for taking the time to consider my comments on this important issue.

Sincerely,

Betsy Lawless



**THE UNIVERSITY OF MICHIGAN**

SCHOOL OF BUSINESS ADMINISTRATION

ANN ARBOR, MICHIGAN 48109-1234

Dick A. Leabo  
Fred M. Taylor Endowed  
Distinguished Professor  
of Statistics, Emeritus

**8 March 2011**

**Seattle Department of Planning and Development  
Attn.: James Holmes  
700 Fifth Avenue, Suite 1900  
P.O. Box 34019  
Seattle, WA 98124-4019**

**Sir:**

**My wife and I have only lived in Seattle for 20 months but we have been interested in the development of the South Lake Union area long before we invested in the area. We invested a lot of money in our new home at Mirabella just as have 300 other individuals. Another 250 people will be doing the same in a couple of years.**

**All of us relied on the knowledge that the current zoning would remain the same. Now we are told that it is a fait de accompli that any one of three revisions to the zoning will change to allow structures 300 to 900 feet high.**

**That is ridiculous to destroy the views of South Lake Union and Gas Works Park. My wife and I and the rest of the current residents of Mirabella favor Option 4 which would retain the current zoning. We all urge you in the interest of maintaining the current beauty of the area and in fairness to the tax payers now living at Mirabella to do the realistic thing. If the city has any interest in having another 250 taxpayers move into the area, not counting other developments, now and in the future, the decision before your group should be obvious.**

**Thank you for your consideration on our behalf as you make a tremendously significant decision that could negatively change the appearance of the area for years to come.**

**Sincerely,**

**Dick A. Leabo. Ph.D**

1

1221 Second Avenue  
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PERKINS  
+ WILL

April 11, 2011

Seattle Department of Planning and Development  
Attn: James Holmes  
700 Fifth Ave., Suite 1900  
P.O. Box 34019  
Seattle, WA 98124-4019  
southlakeunioneis@seattle.gov

RE: South Lake Union Height and Density Draft EIS

I am a native Seattleite, and an architect who has spent my career working in my hometown. I've observed the remarkable transition toward a mixed-use neighborhood that has occurred in South Lake Union, have been able to participate professionally in the development of key projects in the area, and have great optimism about the district's future. I'm extremely glad the City is taking a serious look at incentive zoning, which can make a significant contribution toward enabling the neighborhood to reach its potential as a great urban center.

I fully support the twin vehicles of increased height and density in South Lake Union.

- A disciple of Jane Jacobs, I believe in the principles of street-level activity, eyes on the street, and diversity in land use. Density is the key contributor to a rich and varied urban streetscape.
- Increased density supports sustainability goals, with the ability to facilitate more energy-efficient buildings, reduce demand on infrastructure, and increase use of alternative transportation.
- Rights-of-way in SLU are very wide. Consequently relatively tall podium structures can be accommodated without compromising light and air at street level.
- Height is not to be feared. The alternatives described in the Draft EIS all include limitations on tower size and spacing. By including bulk and open space limitations, incentive zoning can ensure access to light, air and views.
- Street level character is the most important feature of urban development – building height is secondary. Scale, diversity of use, pedestrian amenity are all established at the street. The interface between private development and public realm is where urban character is made, and is where zoning regulations traditionally fail to adequately define.

1

I also support incentive zoning as a strategy to encourage density while ensuring that growth contributes to livability and sustainability. Incentivizing developers toward increased height and density, in exchange for contributing to coordinated public improvements, is a fair, reasonable and desirable trade-off:

2

- The public realm is the connective tissue of neighborhoods. Publicly-owned right-of-way comprises a significant area in SLU, consequently has the greatest potential for creating a coordinated, pedestrian-supporting urban environment. To the greatest extent possible development bonuses should support urban amenities in the existing rights-of-way. Too much of recent downtown development consists of individual buildings – what is needed is the creation of neighborhoods by way of a thoughtfully crafted public realm.
- The City's resources to devote to public amenities have become seriously constrained, and likely will be for the foreseeable future. Linking increased development capacity to developers' support is a viable way of funding these essential components.
- Urban relief in the form of well-designed and usable open space can be incorporated into individual projects in ways that complement the public realm.

2 cont

I encourage the City to evaluate the EIS alternatives in the broadest possible light. We're at a threshold in urban development where past practice and current trends are inadequate to predict future needs. For example next-generation workspaces for the information technology, biotechnology and global health sectors increasingly look to large floor plates to encourage intellectual synergy, provide infrastructure and suit corporate culture needs. These needs must be reconciled with sustainable design strategies such as natural light, ventilation and energy efficiency that are also necessary elements off the future workplace; with the resultant urban character; and with short- and long-term economics of development. Rightly or wrongly, the zoning criteria established by this effort will become default design parameters for the next generation of development in SLU. It's critical for the EIS analysis to thoroughly examine the economic, physical and social consequences of all viable alternatives if the result is to be truly forward-looking. The zoning tools ultimately need to offer the flexibility needed to adapt to changing needs.

3

Seattle has an unfortunate history of adopting overly prescriptive land use requirements, which have resulted in unintended consequences (remember skinny houses?). The process underway in SLU presents the opportunity to get it right: to outline the over-arching principles that establish a vision of SLU as a dynamic, future-oriented urban center. The process should purposefully avoid becoming prescriptive. For example floor plate sizes in podiums should be a function of the urban characteristics of block size, street definition and light-and-air access combined with functional requirements of building users, rather than arbitrary square-foot limitations which ultimately become practical minimums as well as maximums. Zoning should clearly identify and articulate the vision of *what* wants to be achieved over the next generation of development in South Lake Union. *How* that vision becomes realized needs to be left up to the creativity of the developers, designers, and other participants in the processes that follow.

Sincerely,



Larry Leland, AIA, LEED AP  
Perkins+Will  
larry.leland@perkinswill.com

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Table 4-2

Responses to Public Comments Received During the Comment Period

Comment Number	Response
<b>Letter 90: Heffron, Marni</b>	
1	<b>South Lake Union/Uptown Triangle Mobility Plan.</b> The comments are acknowledged. Please see responses to comments in the balance of this letter.
2	<b>Mitigation.</b> See response to Letter 18 Comment 33.
3	<b>Threshold of Significance.</b> The city has reviewed the thresholds of significance considered in the DEIS and has made a revision related to roadway operations impacts. The strict demand to capacity (d/c) ratio threshold has been removed in place of a more holistic evaluation of overall vehicle trip generation in the South Lake Union area. Please see the errata for the changes to the DEIS language.
4	<b>Mercer Street Underpass.</b> The Mercer Street undercrossing under Aurora Avenue is not a fully funded project and therefore was not assumed as a background improvement. The undercrossing improvement is part of the Mercer West Corridor project.
5	<b>Mitigation.</b> Similar to the concept of incorporating the mitigation measures from the South Lake Union/Urban Triangle Mobility Plan, the City is open to incorporating elements of the South Lake Union Transportation Demand Management Program. However, given the programmatic nature of this EIS, specific elements of the South Lake Union Transportation Demand Management Program.
6	<b>Incentive Zoning Bonus.</b> The City supports applying a portion of the Incentive Zoning bonus program toward transportation improvements, so long as the improvements are consistent with those identified as part of the Urban Design Framework.
7	<b>Private Shuttles.</b> The use of private shuttles may be included as part of a mitigation program. This does not change the outcome of the Draft EIS.
8	<b>Parking Supply.</b> The parking supply estimates included in the DEIS were developed following a methodology applied in the South Downtown Height and Density EIS. As pointed out by the commenter, there is not a direct relationship between mode of travel expectations and parking supply estimates. Note that the parking supply estimates presented in this DEIS were intended to give a rough estimate of total supply and are not intended to be used to define parking ratios or limits. Parking requirements will be defined on a project specific level.

Comment Number	Response
9	<b>Denny Way Capacity.</b> The commenter suggests increasing the capacity assumed for Denny Way due to the left turn restrictions. Although it may be reasonable to assume a higher capacity, resulting in lower d/c ratios, this would not change the outcome of the Draft EIS impact identification.
10	<b>King County Metro Route 309.</b> Route 309 was not in service during the time this analysis was completed and would not change the findings. Therefore, it is not included in the Draft EIS.
11	<b>Urban Village Transportation Network.</b> While we agree with the commenter regarding the UVTN transit analysis, it is not used to assess impacts, and therefore would not change the outcome of the Draft EIS.
12	<b>Mid-block Connectors.</b> Given the programmatic nature of this EIS, the method to implement the recommended mid-block crossings has not been determined. Specific mid-block pedestrian accommodations will be identified as part of individual project reviews or the requirements may be incorporated as part of the land use code or development standard.
13	<b>Data for SEPA Analyses.</b> The City will provide example trip generation rates for residential, retail, and office uses that are consistent with the EIS methodology.
<b>Letter 91: Hennings, Gloria</b>	
1	<b>Keep Current Height Restrictions.</b> The comment is noted.
<b>Letter 92: Herb, Frederick and Margaret</b>	
1	<b>Provisions for Families.</b> The comments are noted. Please see Draft EIS Section 3.16, Open Space and Recreation. See Final EIS Section 3.5 for a discussion of schools.
2	<b>Parking Availability and Pricing.</b> While parking spillover is defined as a potential impact, cost is not considered an environmental impact.
3	<b>East/West Transit Access.</b> Please see Draft EIS Section 3.13 for a discussion of transit service and recommended mitigation.
4	<b>Residential Character.</b> The character and duration of tenure of potential future residents is unknown.
5	<b>Building Height and Density.</b> The comments are noted.
6	<b>Building Height Near Lake Union.</b> The City of Seattle does not have a formal or informal policy of building height step down toward the water. As described in the Draft EIS, the alternatives do generally decrease in height

Comment Number	Response
	from the south boundary of the neighborhood toward the north. The one exception is Alternative 1, which includes building height increases in the block north of Mercer Street.
7	<b>Incentive Benefits.</b> The comment is noted. The geographic focus or distribution of public benefit will depend on the type of benefit provided. Financial contributions are required to be used to within the vicinity of the neighborhood.
8	<b>Additional Mitigation.</b> The comment is noted. Mitigation strategies address identified impacts.
<b>Letter 93: Hill, G. Richard</b>	
1	<b>35,000 SF Floorplates.</b> Beginning in late 2008 and continuing through 2009, the City worked with interested citizens and other stakeholders to define the alternatives to be studied in the EIS. Through this public process, the standard for commercial floor plate size was reduced from 35,000 sf to 24,000 sf. Please see the discussion of alternatives eliminated from consideration, Draft EIS Section 2.3.7. Conceivably, larger floor plate size may be appropriate in certain areas of the study area and localized study may be warranted.
<b>Letter 94: Holberg, Hillary</b>	
1	<b>Support Expansion of the Neighborhood.</b> The comment is noted.
<b>Letter 95: Holmes, Robert J.</b>	
1	<b>Support Proposed Zoning Changes.</b> The comments are noted.
<b>Letter 96: Howe, Douglas, and Hurd, A-P</b>	
1	<b>Draft EIS Comments.</b> The comments are noted. Please see the responses to comments in this letter, below.
2	<b>AQ and GHG Analyses.</b> The air quality assessment for the project was focused on traffic-related emissions of the criteria air pollutant carbon monoxide (CO), using CO as an indicator of potential impact. The CO analysis examined the potential for local "hot spots" due to project related traffic in a manner consistent with EPA guidance for such assessments.  While the analysis shows that increased development in the neighborhood is associated with increased GHG emissions, the conclusion is not that limiting growth in urban centers has a positive impact on GHG emissions. The analysis acknowledges that GHG emissions can only be considered on a global cumulative basis and neighborhood-wide totals are difficult to put into perspective. As a more meaningful measure, the analysis considers per capita

Comment Number	Response
	emissions. As shown in the Draft EIS Table 3.7-6, the analysis concludes that on a per capita basis the three action alternatives produce transportation GHG emissions that are about five percent lower than the No Action Alternative. Compared to a typical suburban employment center along Bel-Red Road in Bellevue and Redmond, the action alternatives would result in GHG emissions that are about 15 percent lower per capita.
3	<b>35,000 SF Floorplates.</b> Beginning in late 2008 and continuing through 2009, the City worked with interested citizens and other stakeholders to define the alternatives to be studied in the EIS. Through this public process, the standard for commercial floor plate size was reduced from 35,000 sf to 24,000 sf. Please see the discussion of alternatives eliminated from consideration, Draft EIS Section 2.3.7. Conceivably, larger floor plate size may be appropriate in certain areas of the study area and localized study may be warranted.
4	<b>Podiums.</b> The comment is noted. Please see the response to Comment 3 this letter, above.
<b>Letter 97: Hoy, Mary</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
<b>Letter 98: Huard, Brock</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
<b>Letter 99: Huberty, Dan</b>	
1	<b>Support Increased Height and Density.</b> The comment is noted.
<b>Letter 100: Hughes, Brendan</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
<b>Letter 101: Hurd, A-P</b>	
1	<b>Draft EIS Comments.</b> The comments are noted. Please see the responses to comments in this letter, below.
2	<b>Greenhouse Gas Emissions.</b> While the analysis shows that increased development in the neighborhood is associated with increased GHG emissions, the conclusion is not that limiting growth in urban centers has a positive impact on GHG emissions. The analysis acknowledges that GHG emissions can only be considered on a global cumulative basis and neighborhood-wide totals are difficult to put into perspective. As a more meaningful measure, the analysis considers per capita emissions. As shown in Draft EIS Table 3.7-6, the analysis concludes that on a per capita basis the

Comment Number	Response
	<p>three action alternatives produce transportation GHG emissions that are about five percent lower than the No Action Alternative. Compared to a typical suburban employment center along Bel-Red Road in Bellevue and Redmond, the action alternatives would result in GHG emissions that are about 15 percent lower per capita.</p>
<p><b>3</b></p>	<p><b>35,000 SF Floorplates.</b> Beginning in late 2008 and continuing through 2009, the City worked with interested citizens and other stakeholders to define the alternatives to be studied in the EIS. Through this public process, the standard for commercial floor plate size was reduced from 35,000 sf to 24,000 sf. Please see the discussion of alternatives eliminated from consideration, Draft EIS Section 2.3.7. Conceivably, larger floor plate size may be appropriate in certain areas of the study area and localized study may be warranted.</p>
<p><b>4</b></p>	<p><b>Podiums.</b> The comment is noted. Please see the response to Comment 3 this letter, above.</p>
<p><b>Letter 102: Ito, Doug</b></p>	
<p><b>1</b></p>	<p><b>Support Increased Height and Density.</b> The comments are noted.</p>
<p><b>Letter 103: Johnson, Annalisa</b></p>	
<p><b>1</b></p>	<p><b>Support Rezoning.</b> The comment is noted. As described in Chapter 2, the proposal considered in the EIS is the potential use of incentive zoning as a strategy to achieve neighborhood plan goals and other public benefits. Incentive zoning would allow increased height and density if public benefits defined in City code are provided. The underlying Seattle Mixed zoning designations and standards would not be rezoned. Under the three action alternatives, the existing Industrial Commercial zone would be rezoned to Seattle Mixed (SM). This change in zone is intended to achieve consistency within the neighborhood rather than to permit greater height or density.</p>
<p><b>Letter 104: Johnson, Jay</b></p>	
<p><b>1</b></p>	<p><b>Support Increased Height and Density.</b> The comments are noted.</p>
<p><b>Letter 105: Kaivola, Linda</b></p>	
<p><b>1</b></p>	<p><b>Support Increased Height and Density.</b> The comments are noted.</p>
<p><b>Letter 106: Kaylor, Courtney A.</b></p>	
<p><b>1</b></p>	<p><b>Disclosure of Impacts.</b> The comment is noted. The environmental consequences of the proposal and alternatives are fully disclosed in the Draft EIS. Please see the response to comments in this letter below.</p>

Comment Number	Response
2	<p><b>Minimum Lot Size.</b> Please see the development assumptions described in Draft EIS Section 3.10.1 and further clarified in Final EIS Section 3.4. As described in these sections, a set of realistic assumptions were developed to identify potential development footprints, locations and orientations. Assumptions included site aggregation to achieve minimum lot sizes and development consistent with underlying zoning for lots with less than 22,000 sf. City staff and the consultant team used the development assumptions as a framework to development full development capacity under each alternative.</p> <p><i>Land Use and Housing.</i> The density and capacity information provided in the Draft EIS uses the minimum lot size assumptions. Capacity and density under these assumptions is fully disclosed in the Draft EIS.</p> <p><i>Aesthetics.</i> Please see Final EIS Section 3.4 for updated birds-eye view images of the study area showing cumulative development anticipated under each alternative. Also see the street-level and view perspectives that depict potential development with the minimum lot size requirement.</p> <p>Please note that properties with less than 22,000 sf would not be downzoned, but would retain development potential under the current existing zoning. Individual property owner decisions regarding development are based on a variety of factors, including individual financial goals, perceptions of market conditions and development costs, among others. It would be speculative to anticipate how these individual decisions will be made.</p> <p><i>Historic Resources.</i> Future development potential under any alternative may increase pressure for redevelopment on existing small scale structures eligible for historic designations. It is acknowledged that the minimum lot size requirement may reduce the pressure on those structures located on lots smaller than 22,000 sf.</p>
3	<p><b>Urban Design Framework.</b> The commenter raises concerns that the plans for Eight Avenue N and Thomas Street in the Urban Design Framework were not considered in transportation analysis. The UDF provides potential guidelines, but they are not adopted in any City plan. It is speculative to assess impacts based on potential designs without clear sources of funding. Both of these streets are included in the Seattle travel demand model which indicates that there is capacity for vehicles and no other impacts are expected.</p>
<b>Letter 107: Kelly, James</b>	
1	<p><b>Alternatives 1 and 2 Regressive.</b> The comments are noted.</p>
<b>Letter 108: Kenny, Daniel</b>	
1	<p><b>Support Alternative 1.</b> The comments are noted.</p>

Comment Number	Response
<b>Letter 109: Kenny, Dennis E.</b>	
1	<b>Support Alternative 1.</b> The comments are noted.
<b>Letter 110: Kenny, Diane</b>	
1	<b>Support Alternative 1.</b> The comments are noted.
<b>Letter 111: Kent, Mike</b>	
1	<b>Support Higher Density Development.</b> The comments are noted.
<b>Letter 112: Kinzer, Craig and Richey, Kris</b>	
1	<b>35,000 SF Floor Plates.</b> Beginning in late 2008 and continuing through 2009, the City worked with interested citizens and other stakeholders to define the alternatives to be studied in the EIS. Through this public process, the standard for commercial floor plate size was reduced from 35,000 sf to 24,000 sf. Please see the discussion of alternatives eliminated from consideration, Draft EIS Section 2.3.7. Conceivably, larger floor plate size may be appropriate in certain areas of the study area and localized study may be warranted.
<b>Letter 113: Kitto, Terri</b>	
1	<b>Support Greater Building Heights.</b> The comments are noted.
<b>Letter 114: Kleinart, Jack</b>	
1	<b>Keep Existing Zoning in Cascade Area.</b> The comment is noted. Please note that existing zoning is retained in Alternatives 2, 3 and 4. Alternative 1 would allow increased height through incentive zoning provisions.
<b>Letter 115: Kleinart, Layne</b>	
1	<b>Public Meeting.</b> The comment is noted.
2	<b>Long Term Livability.</b> The comment is noted.
3	<b>Southeast Flight Path.</b> The flight path that is referred to in the comment, and located near the southeast portion of Lake Union, is used for inbound aircraft when wind conditions are from the north. Proposed building heights are not a constraint to aviation in this area.
4	<b>Support Alternative 3.</b> The comment is noted.
<b>Letter 116: Koshy, Ben</b>	
1	<b>Support Higher Density Growth.</b> The comment is noted.
<b>Letter 117: Kroll, Jeff</b>	
1	<b>Flexibility in Podium Heights.</b> The comment is noted.

Comment Number	Response
2	<p><b>Floor Plate Size.</b> Beginning in late 2008 and continuing through 2009, the City worked with interested citizens and other stakeholders to define the alternatives to be studied in the EIS. Through this public process, the standard for commercial floor plate size was reduced from 35,000 sf to 24,000 sf. Please see the discussion of alternatives eliminated from consideration, Draft EIS Section 2.3.7. Conceivably, larger floor plate size may be appropriate in certain areas of the study area and localized study may be warranted.</p>
3	<p><b>Flight Path.</b> Subsequent to issuance of the Draft EIS, additional review of the flight path was conducted (see Appendix F). This analysis included a review of how seaplane lanes are utilized (including runway utilization, flight tracks, and piloting techniques), an evaluation of the aircraft fleet used by floatplane operators, and documentation of the performance characteristics of the various floatplane aircraft. Several Federal Aviation Administration (FAA) and International Civil Aviation Organization (ICAO) planning documents that have applicability in the establishment of approach/departure protection boundaries for curving approach and departure procedures such as those used on Lake Union were also reviewed.</p> <p>Based on this analysis, and in coordination with WSDOT Aviation, a revised flight path was identified (see Section 3.2 of this Final EIS). This revised flight path differs from that shown in the Draft EIS in that portions are narrower than the previous flight path, the curvature is more gradual, and the east-west legs of the flight path have shifted slightly to the north. Specifically, the southern boundary has shifted 400-500 feet north so that the southern boundary lies north of Valley Street and is generally aligned with Broad Street. The southern boundary now crosses Aurora Avenue North at about Mercer Street. Similarly, the northern boundary of the flight path shifted 200-300 feet north, crossing the Lake Union shoreline at roughly Highland Drive and crossing Aurora Avenue just north of Ward Street. Please see Section 3.4 Aesthetics for revised images associated with the revised flight path.</p> <p>An additional mitigation measure has been recommended in this EIS – that a project-level analysis of wind impacts be required for all new development above the base height permitted under the Seattle Mixed zoning.</p>
4	<p><b>Geology and Soils Mitigation.</b> As the commenter notes, site specific mitigation will be defined as part of project specific review.</p>
5	<p><b>Above Grade Parking.</b> The commenter is referring to a development assumption described in Section 3.10 that future parking would be one-half below grade and one-half above grade. This was intended as an assumption to allow an estimate of development envelope for the aesthetics analysis and not intended to suggest a standard for future development.</p>

Comment Number	Response
<b>Letter 118: Kushmerick, Martin</b>	
1	<p><b>2031 Growth Estimate.</b> As described in Draft EIS Section 2.2, the 2031 estimates are intended to provide additional context for understanding potential long-term growth in South Lake Union. As noted in the discussion in this section, the estimate is for analysis purposes only and does not represent policy intent by the City. In order to disclose the potential range of capacity needed to meet a future growth target for South Lake Union, both 2024 and 2031 are considered in the analysis.</p> <p>In Draft EIS Section 3.8, additional discussion of the Seattle Comprehensive Plan Urban Village Element states that formal City action to establish a growth will occur in the future based on an analysis of the capacity of all of the urban centers and other areas of the City. Consistent with the Washington Growth Management Act, the South Lake Union 2031 growth target that is ultimately proposed and adopted by the City will reflect an understanding of overall development capacity.</p>
2	<p><b>Neighborhood Facilities.</b> The comments are noted. Please see the South Lake Union Neighborhood Plan, which includes the following neighborhood character goal:</p> <p style="padding-left: 40px;">Goal 1: A vital and eclectic neighborhood where people both live and work, where use of transit, walking and bicycling is encouraged, and where there are a range of housing choices, diverse businesses, arts, a lively and inviting street life and amenities to support and attract residents, employees and visitors.</p> <p>As described in Final EIS Chapter 2, a fundamental objective of the proposal considered in the EIS is to use incentive zoning to achieve public benefits, including those listed in the comment. Please see Draft EIS Section 3.16 for a discussion of open space and recreation facilities and Final EIS Section 3.5 for a discussion of schools.</p>
3	<p><b>Neighborhood Amenities.</b> Please see the response to Comment 2 in this letter, above. Regarding the transportation methodology, please see Draft EIS Appendix E, which presents statistical evidence demonstrating that the MXD model is an appropriate tool available for analyzing dense mixed use environments, such as South Lake Union.</p>
4	<p><b>Aesthetics and Neighborhood Plan.</b> The comment is noted. Please see the South Lake Union Urban Center Neighborhood Plan (2007), which discusses many of the planning issues mentioned in the comment. The EIS was specifically focused on a proposal to use incentive zoning measures that would allow increased height and density if certain public benefits are provided.</p>

Comment Number	Response
5	<b>Parks and Open Space.</b> The comments are noted.
<b>Letter 119: Kushmerick, Patricia</b>	
1	<b>Growth Should Not Detract from Uniqueness.</b> The comment is noted.
2	<b>Lake Union Views.</b> The comment is noted. Please see the revised view analysis images in Final EIS Section 3.4.
3	<b>Affordable Housing.</b> The comment is noted. As described in Final EIS Chapter 2, a fundamental objective of the proposal considered in the EIS is to use incentive zoning to achieve public benefits, including affordable housing.
4	<p><b>Affordable Housing and Towers.</b> The comment is noted. Draft EIS Section 3.9.2, Housing, describes that incentive zoning provisions, including developer financial contributions to affordable housing, may be used to achieve increased residential building heights. Through use of these incentives, the action alternatives may have the potential to result in an increased number of affordable units.</p> <p>The discussion in Section 3.9.2 states that there are a number of factors that impact the potential for affordable housing, including development costs, property values, market demand, individual property owner goals, and opportunities for financing affordable housing. Under any of the alternatives, these factors will affect the actual number of affordable units that are built in the neighborhood.</p>
5	<b>Demographics and Housing.</b> The comment is noted. Please see the South Lake Union Urban Center Neighborhood Plan (2007), which addresses the broader planning issues identified in the comment. The EIS was specifically focused on a proposal to use incentive zoning measures that would allow increased height and density if certain public benefits are provided.
6	<b>Community Services.</b> As described in Final EIS Chapter 2, a fundamental objective of the proposal considered in the EIS is to use incentive zoning to achieve public benefits, including those listed in the comment. Please see Draft EIS Section 3.16 for a discussion of open space and recreation facilities and Final EIS Section 3.5 for a discussion of schools.
7	<b>Pea Patch.</b> The comment is noted. Please see the South Lake Union Urban Center Neighborhood Plan (2007) Parks and Open Space goals, policies and strategies. As described in Final EIS Chapter 2, a fundamental objective of the proposal considered in the EIS is to use incentive zoning to achieve public benefits, which could include a pea patch or other open space facilities.
8	<b>Shading.</b> Please see Final EIS Section 3.4 for a revised discussion of shadow

Comment Number	Response
	impacts, which considers shading on public parks in South Lake Union.
9	<b>Family Living.</b> The comment is noted.
10	<b>Transportation Analysis.</b> The comment is noted. The methodology and assumptions contained in the transportation analysis are described in Draft EIS Chapter 3.13. Draft EIS Appendix E presents the statistical evidence demonstrating that the MXD model is an appropriate tool available for analyzing dense mixed use environments, such as South Lake Union.
11	<b>2031 Growth Estimate.</b> As described in Draft EIS Section 2.2, the 2031 estimates are intended to provide additional context for understanding potential long-term growth in South Lake Union. As noted in the discussion in this section, the estimate is for analysis purposes only and does not represent policy intent by the City. In order to disclose the potential range of capacity needed to meet a future growth target for South Lake Union, both 2024 and 2031 are considered in the analysis.
12	<b>Cascade Neighborhood West Boundary.</b> The comment is noted.
13	<b>Infrastructure.</b> The comments are noted. Please see Draft EIS Chapter 3.13, transportation analysis for a discussion of these issues.
14	<b>Conclusion.</b> The comments are noted. Please see the responses to comments in this letter, above.
<b>Letter 120: Langrand, Sylvain</b>	
1	<b>Consider Alternative 3.</b> The comment is noted.
<b>Letter 121: Larsen, Brian R.W.</b>	
1	<b>Support Additional Height and Density.</b> The comment is noted.
<b>Letter 122: Lawless, Betsy</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
<b>Letter 123: Leabo, Dick A.</b>	
1	<b>Support Alternative 4.</b> The comments are noted. Please note that the greatest building height proposed under any of the alternatives is 400 feet.
<b>Letter 124: Leland, Larry</b>	
1	<b>Support Increased Height and Density.</b> The comments are noted.
2	<b>Support Incentive Zoning.</b> The comments are noted.
3	<b>Broad Perspective.</b> The comments are noted. The City issued the Scoping Notice for this Draft EIS on November 18, 2008 and invited comments on the

Comment Number	Response
	<p>EIS scope through December 18, 2008. Through 2009, the City worked with neighborhood stakeholders to address concerns raised by the scoping comments. Based on this process, the City finalized the scope of the EIS.</p>

### Comment Letters 125-159

<b>125.</b>	Link, Kristen
<b>126.</b>	Littlel, John
<b>127.</b>	Loacker, John
<b>128.</b>	Lust, Todd
<b>129.</b>	Malaspino, Joe
<b>130.</b>	Markley, David D.
<b>131.</b>	Masson, Chris
<b>132.</b>	Masson, Diane
<b>133.</b>	Matthews, Carrie
<b>134.</b>	Matthews, Tim
<b>135.</b>	McKay, JJ
<b>136.</b>	McLaughlin, Jan
<b>137.</b>	Miller, Terry
<b>138.</b>	Moss, Christine
<b>139.</b>	Mulica, Thomas
<b>140.</b>	Munger, Jeffrey
<b>141.</b>	Muratore, Michael
<b>142.</b>	Naprawrich, MaryAnn
<b>143.</b>	Norton, Ruthe and Frank
<b>144.</b>	Novy, Richard
<b>145.</b>	Nottingham, Sarah Rose
<b>146.</b>	O'Brien, Kathleen
<b>147.</b>	Ostergaard, Paul B
<b>148.</b>	Parente, Kini
<b>149.</b>	Parrish, Brad
<b>150.</b>	Parsons, Craig
<b>151.</b>	Pavlovec, Brian and Giselle
<b>152.</b>	Pearson, William
<b>153.</b>	Pehrson, John
<b>154.</b>	Penn, Steve
<b>155.</b>	Petrie, Mark
<b>156.</b>	Pope, Charles E.
<b>157.</b>	Potter, William W.
<b>158.</b>	Rabe, Jeff
<b>159.</b>	Randall, Jaime

Holmes, Jim

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**From:** Kristen Link  
**Sent:** Sunday, April 03, 2011 12:40 PM  
**To:** Holmes, Jim  
**Subject:** Comment on South Lake Union DEIS

Jim,

I would just like to comment on the DEIS proposed for SLU. Looking at the alternatives I am in favor of alternative 3. Alternative 1 has heights that block views from I-5 of the water and space needle. Even though the topography goes down I can't believe that you would allow up to 300 foot buildings along the waterfront of lake union. With the zoning in alternative one you are allowing zoning equal to downtown highrises for large style office buildings and high end condos, hotels, and apartments only the more wealthy can afford also permanently blocking views of some of Seattle's greatest visual assets the space needle and south lake union waterfront. South Lake Union isn't downtown and doesn't need a height increase that will dominate development in the area creating high end buildings for a few in Seattle at the cost of the public views and south lake unions current neighborhood feel and charm. Mid-rise development in that area given all of Seattle's other neighborhood urban centers and villages is more than enough to handle density projections and development and more neighborhood scales. I will be really disappointed for Seattle if alternative 1 passes for developers, construction, and design community members at the cost of the public views and what has started as a great neighborhood/bio tech life sciences neighborhood at a perfect scale for creating that kind of community.

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Kristen Link

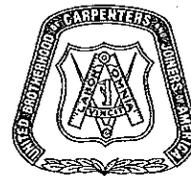
# Pacific Northwest Regional Council of Carpenters



Affiliated with  
United Brotherhood of Carpenters and Joiners of America

John Littel, Political Director

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Seattle Department of Planning and Development  
Attn: James Holmes  
700 Fifth Ave., Suite 1900  
P.O. Box 34019  
Seattle, WA 98124-4019  
[southlakeunioneis@seattle.gov](mailto:southlakeunioneis@seattle.gov)

RE: South Lake Union Height and Density Draft Environmental Impact Statement (DEIS)

Dear Mr. Holmes;

This letter is a comment on the Draft EIS for South Lake Union.

For many years, the Seattle Carpenters have followed South Lake Union's redevelopment with great interest. We share the community's vision for South Lake Union as a commercial and residential Urban Center. As such, we have supported public and private investment in the South Lake Union streetcar line, Mercer Corridor Project and Lake Union Park:

This investment has set the stage for zoning changes to allow a greater intensity of jobs and housing units in this vibrant community. You are encouraged to take the following factors into consideration as you prepare the Final Environmental Impact Statement:

- Taller buildings and getting out of Type 5 construction will result in higher quality structures.
- Incentive zoning can bring additional resources for community identified civic infrastructure and more affordable housing.
- Height increases can increase the housing supply and generate public benefits to make housing more affordable.
- Increasing jobs and residents adjacent to significant public investment in transportation and parks will make sure the city and region benefits from its investment in the community.
- Height and density will allow more people to locate in this urban center and live a healthier and more environmentally friendly lifestyle.

We have an opportunity to do it right in South Lake Union. We should take advantage of this opportunity for all of Seattle.

Sincerely,

John Littel



1

Holmes, Jim

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**From:** John Loacker  
**Sent:** Wednesday, March 09, 2011 1:00 PM  
**To:** DPD\_Planning\_Division  
**Subject:** SLU re-zone

Hello,

I wanted to voice my support for Alternatives #1 and #2 as a means to strengthen, for the long term, our Seattle Central Business District. Downtown needs a shot in the arm that will encourage quality housing and commercial development and these measures could be just "the shot in the arm" that we need to give our downtown some added energy. Already in place is the SLU Streetcar and plans to improve and widen the Mercer Street Access. This area can handle the growth that we need to provide jobs and housing. 1

I am a 3rd generation owner of two small family businesses (Kroll and Metsker Maps) and we have not only watched, but mapped the growth in this area for decades (100 years). I can't think of an area that more ready and capable of handling high-density growth.

I am also a (near) life-long resident of Queen Anne. I remember in the 1970's there was an organization called the USSR (i.e., the United South Slope Residents) which protested building heights on Queen Anne. This led to needed protection for property owners from high-rise development that was strategically placed to maximize the view of the new development, without regard for the existing property owners. In my opinion the height issues being discussed in the SLU are totally different since these (higher) structures will blend in with the existing cityscape. This is only my opinion but I have not been shown any information that contradicts this.

I don't see any negatives, just positives such as vibrant housing close to the potential workplaces, existing and unique public transit, a new park, and expanded freeway access.

Thank you for your consideration of this.

John Loacker

**King, Donna**

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**From:** Todd Lust [tlust99@hotmail.com]  
**Sent:** Friday, April 08, 2011 3:25 PM  
**To:** DPD\_Planning\_Division  
**Subject:** South Lake Union EIS

I am an individual who has worked in the South Lake Union for the past 8 years. I have enjoyed seeing the progress in South Lake Union area. It is amazing to see the area change in the past 5 years. The area has transformed from a small industrial sector to a great place for many great companies to work. The amount of housing options has also increased, giving people many reasonable housing options just north of downtown.

I think adding density to an underutilized area is a great opportunity for Seattle to create better housing options and attract some great businesses. After seeing the progress that has already taken place in the area, I think we should continue the momentum and allow more density in the area. The area is headed in the right direction, but the current building heights are limiting the new buildings to shorter buildings taking up the entire block. It would be great to allow new buildings to grow in height and reduce their footprint.

I would like to see the city adopt Alternative 1. I think it is time to maximize our City's resources and attract as many businesses and people to the South Lake Union area.

Thanks.

Todd Lust

Holmes, Jim

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**From:** Joe Malaspino [jbspino@msn.com]  
**Sent:** Monday, April 11, 2011 4:48 PM  
**To:** DPD\_Planning\_Division  
**Subject:** South Lake Union Height & Density Draft Environmental Impact Statement.

To whom it may concern,

I am a lifelong resident of the City of Seattle, 40 plus years, currently living in West Seattle and working in the South Lake Union neighborhood. I spend a considerable amount of my time in the neighborhood both at work and at play. I love the new park, sailing on the lake and now with the new restaurants opening, dining on the weekends. As I watch the neighborhood change from the one I remember as a kid growing up, I think of how great an area this can and will be. To keep headed in the right direction we will need additional height and density in our developments. The area is in a perfect location to support this type of growth so please keep an open mind about taller buildings in the South Lake Union neighborhood.

Thank you,

Joe Malaspino



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April 11, 2011

Diane Sugimura, Director  
City of Seattle, Department of Planning and Development  
700 Fifth Avenue, Suite 2000  
P.O. Box 34019  
Seattle, WA 98124-4019

Subject: South Lake Union Height and Density Alternatives –Transportation Section Review

Dear Ms. Sugimura,

This letter is intended to offer comment and input to the South Lake Union Height and Density Alternatives, Draft Environmental Impact Statement (DEIS). I am writing this on behalf of Clise Properties, Inc. who is very supportive of developing properties of greater height and density in the South Lake Union neighborhood. These comments are intended to be constructive rather than critical with the understanding that the long term health of the South Lake Union neighborhood, the City and the Central Puget Sound region must be balanced and integrated to be successful.

To that end, this letter identifies areas that we believe warrant further examination to ensure viable development in the South Lake Union neighborhood without creation of unintended consequences that impact other Seattle neighborhoods. My comments focus on the Transportation Element of the DEIS as they relate to the broader range of development considerations, policy development, and infrastructure improvements.

**Study Area Definition** - The study area defined for the transportation element of the DEIS should be expanded. Much of the increased height and density is targeted for the southwest corner of the South Lake Union neighborhood which runs along Denny Way, the southernmost boundary of the study area. It is only logical that the transportation systems and network supporting this edge of the South Lake Union neighborhood will extend into the Downtown, Belltown, and Denny Triangle neighborhoods. This is illustrated by the fact that traffic forecasts show that d/c ratios (traffic demand-to-road capacity ratios) on Denny Way reach 1.54. These findings suggest extraordinary levels of congestion (54 percent overcapacity) and unrealistic levels of delay.

1

**Imbalance of Traffic Impacts** - The traffic forecasting model should be recalibrated to reflect a more balanced distribution of the forecasted traffic volumes. There is a significant difference in the congestion levels forecasted in corridors leading to and from the regional highway system. As noted above, there is a high level of congestion along the south edge of the South Lake Union neighborhood, yet, the Mercer Street corridor is forecasted to operate just below capacity (d/c = 0.98 – 0.99). Our experience suggests that drivers try to find the

2

path of least resistance and will not endure the high levels of congestion in the Denny Way corridor when they have a less congested alternative route that is only minutes away. As noted above, some of this traffic demand may also spill over into the Downtown area but impacts are not disclosed due to the self constrained definition of the study area.

2 cont

**Assessment of Realistic Congestion Levels** - Traditional intersection or corridor level of service analysis should be performed at selected critical intersections (up to 10 intersections in the area). While the demand-to-capacity ratio (d/c ratio) method of corridor analysis is a generally accepted tool for long range planning comparisons, it does not reasonably reflect actual traffic operations - what the driver sees or what the City requires when evaluating development proposals. We believe this is particularly critical in this EIS because there are thousands of new bicycle and pedestrian trips. Reflection of these non-motorized modes of travel at intersections creates added impedence and delay that is not reflected by the d/c ratio analysis and will likely add to the congestion forecasted.

3

**Complete Impact Comparison** – The traffic forecasts for the adopted land use density and the height and density alternatives should be compared against existing conditions to reflect the true level of mode shift required by the proposed changes. The forecasted travel demand associated with the height and density alternatives are compared against the height and density under adopted policy. While this is a valid comparison, it only illustrates a small portion of the significant changes implied by the increased density associated with the three development alternatives. We believe that the comparison should also include mode split data for existing conditions. Such a simple comparison is presented on Table 1 below. As noted in comments below, we question whether the proposed mitigation can cause the PM Peak Hour automobile mode to drop from 59% today to 37% (a 38% decrease from existing conditions).

4

**Table 1 – PM Peak Hour Mode Split Comparison**

Alternative	Auto Trips	Internal, Bicycle & Pedestrian	Transit
Existing Conditions	59%	10%	23%
No Action Alternative - Current Zoning	51.4%	26.9%	21.7%
Alternative 1			
Without Mitigation	50.5%	27.8%	21.7%
With Mitigation	37.5%	36.2%	26.3%
Alternative 2			
Without Mitigation	50.4%	27.8%	21.7%
With Mitigation	37.4%	36.2%	26.3%
Alternative 3			
Without Mitigation	50.3%	28.0%	21.7%
With Mitigation	37.4%	36.4%	26.2%

**Pragmatic Mitigation** – Provide increased evidence that the proposed mitigation can realistically achieve the mode split changes that are forecasted. While we would all like to believe people’s travel behavior will change, such change is typically very gradual and requires a strong combination of incentives and disincentives to change that behavior. We are concerned that the findings from a single research study from Southern California, negligible increase in King County Metro Transit service (if any), decreases in the short term and long term parking supply, negligible cost assumptions for reserved parking (\$100/month), and participation in the “Voluntary” Traffic Impact Fee Program managed by a public agency with dwindling staff resources, will have the desired effect. Thus, we suggest that more realistic estimates of mode split reduction be developed and then the resultant traffic congestion be considered relative to the development feasibility for accomplishing the proposed densities.

5

**Transportation Capacity** – The proposed increased densities must be evaluated in the context of the rest of the city and the region. While the DEIS discloses very significant impacts, and identifies potential mitigation, there appear to remain conditions where traffic, parking and transit demands substantially exceed their respective capacities.

6

If the proposed South Lake Union densities are accomplished, will the resultant impacts usurp planned and desired development in other parts of the city by using either 1) the available market demand for that development or 2) using all of the transportation capacity in the area? Accordingly, we believe one test that appears to be missing from the analysis is the feasibility of development approval using the development standards (whether adopted or administratively applied) that are applied to a new development application. Can current development standards be met? One option is to change those standards. If such change is contemplated, then the impact of such policy changes should be evaluated in this EIS. In simple terms, can State Environmental Protection Act criteria be met.

Highlighting this concern is the screenline analysis found in Appendix E-8 which shows that several adopted screenline standards are exceeded. If these screenline volumes are exceeded with the increase in volume from this neighborhood alone, will there be any real or theoretical capacity for any other development in the City. The adopted screen line standards are already at a d/c ratio of 1.2 which means that all the bridges over the ship canal are, on average operating at 20% over capacity. Congestion can be an effective disincentive but at the forecasted levels, it can also strangle the quality development that is the very objective of these height and density alternatives. Possibly a logical resolution to this issue would be for the City to review and update the Transportation Concurrency Standards to correspond with desired land use objectives.

I trust this provides you with an understanding of our current perspectives relating to transportation impacts that may not be fully disclosed. We trust this helps to inform further realistic and common sense examination of these issues within the City, among stakeholders and by the FEIS. If you have any question, I encourage you to contact me at your convenience so I can provide necessary clarification.



Diane Sugimura  
April 11, 2011  
Page 4 of 4

Sincerely,  
Transportation Solutions, Inc.

A handwritten signature in black ink, appearing to read "D. Markley", is written over the printed name and title.

David D. Markley  
Principal

**King, Donna**

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**From:** Chris Masson [chrismasson2000@yahoo.com]  
**Sent:** Monday, April 11, 2011 7:57 AM  
**To:** DPD\_Planning\_Division  
**Cc:** Chris Masson  
**Subject:** EIS

EIS does not show an accurate depiction of what the three alternatives will look like in scale to each other or to the surrounding elevations. Better graphics or even a scale model should be developed. |<sup>1</sup>

Of all alternatives, no change in heights and only rezone of use is appropriate. Of the three alternatives, alternative #3 is the next best choice. |<sup>2</sup>

Respectfully submitted,

Chris Masson  
206-650-6206

King, Donna

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**From:** Diane Masson [dmasson2004@yahoo.com]  
**Sent:** Saturday, April 09, 2011 2:50 PM  
**To:** DPD\_Planning\_Division  
**Subject:** EIS Comment

I have been part of South Lake Union neighborhood planning for 6 years and was an original founding member of LUOA. LUOA was never against heights, it was about adding height smartly and making a better neighborhood for more families to move into.

Alternative 3 was morphed from the original LUOA alternative, but is the best of the three choices. The majority of public comment to date has requested no changes in the Cascade Neighborhood and that includes from I-5 to Fairview. Alternative 3 has height on the East side of Fairview and that is unacceptable. The height needs to be far enough away from Cascade park, so that park can have light year round. We need families, dogs and children playing. Don't destroy this park by putting height too close.

1

The original LUOA alternative had lower height right next to the lake. All 3 plans are aggressive by the lake. It's great for developers, but not for those in the bowl between Queen Anne Hill and Capitol Hill. Again the sunlight will be blocked from a brand new 12 acre park that is supposed to attract families etc. The EIS actually talks about building heights affecting wind on the lake. Why destroy boating on the lake? Put the higher height buildings South of Mercer Street. Keep heights low North of Mercer Street.

2

**The City Council and Mayor will now have the power to destroy the South Lake Union Park and Cascade Park by picking any of the 3 alternatives.** Please create a compromise that keeps Cascade Neighborhood intact all the way to Fairview to protect Cascade park sunlight and lower heights next to a very small lake, so everyone can enjoy the view, boaters could still have the wind in their sails, the planes could land properly and families could enjoy Lake Union Park - even in the winter - with Seattle's limited sunlight.

3

Think about each City Council member as they walk to work. The sidewalks are cold and dark by your offices, because there is no sunlight on the sidewalks. Please don't make the South Lake Union Neighborhood like downtown - protect our natural assets - parks and lakes. Create a neighborhood.

4

Please listen to the neighborhood of South Lake Union, you have one chance to get this right. Don't build another tall Belltown with no parks, no families with small children and no sunlight.

Diane Masson  
206-853-6655

**Holmes, Jim**

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**From:** Carrie Matthews  
**Sent:** Thursday, March 10, 2011 3:57 PM  
**To:** DPD\_Planning\_Division  
**Subject:** Comment on the South Lake Union (SLU) Height & Density Draft Environmental Impact Statement

My name is Carrie Matthews and I would like to submit a positive comment on the South Lake Union (SLU) Height and Density Draft Environmental Impact Statement.

I live in the Ballard neighborhood of Seattle. Work in the Stadium/International District of Seattle and like to spend time in the many neighborhoods of our city.

Recently, the upcoming SLU neighborhood of Seattle has undergone great change and I find myself spending time there often. I dine in SLU at Paddy Coyne's, Flying Fish, SeaStar, RE:Public and Lunchbox Laboratory (formerly South Lake Union Grill). I have visited the new Lake Union Park with co-workers and friends. I have shopped at the Whole Foods and Spa Vida on Denny Way and I enjoy attending the annual SLU Block Party every summer.

I support more people and taller buildings in SLU for good reasons. For example, my neighbor has been out of work for over six months. He works in construction management. By allowing density and height in SLU, more construction projects will create more construction/family-wage jobs that could in turn help my neighbor.

Additionally, our nation's President (President Obama) in his State of the Union address in 2011 discussed at length the need to invest in our own future. Creating and building dense urban areas fosters new businesses and ideas, makes it easier to recruit/retain educated employees which results in greater innovation and economic strength for not only SLU and Seattle but King County and Washington State.

I strongly encourage you to embrace growth, progress and Seattle's future by embracing development and taller buildings in SLU. It is the prime neighborhood to absorb such needed growth. It would benefit the most people by generating short-term and long-term jobs, by bringing tax payers into the city and by reducing sprawl into other neighborhoods and/or outlying areas.

Thank you for reading and considering my statement in favor of height and density in SLU.

Sincerely,  
Carrie Matthews

Holmes, Jim

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**From:** timmat timmat [  
**Sent:** Friday, March 11, 2011 3:58 PM  
**To:** DPD\_Planning\_Division  
**Subject:** South Lake Union Height & Density Draft Environmental Impact Statement

My name is Tim Matthews and I would like to submit a comment on the South Lake Union (SLU) Height and Density Draft Environmental Impact Statement.

The South Lake Union area has undergone a huge transition. As a Seattle resident, this was a part of Seattle I previously never considered for work or entertainment. This rebirth is still evolving, and I hope you allow SLU to reach its full potential and positive impact on our city.

As our region struggles with urban sprawl, transportation issues, horrible traffic, and unemployment, South Lake Union is positioned to become a part of the solution to these issues.

Allowing taller buildings and creating the capacity for more residences and workplaces would create a true 'live and work' community. This could take thousands of commuters off of the roadways, allowing more folks to live comfortably in the same neighborhoods as their workplace. Additionally, the construction projects alone could create hundreds of jobs, putting many folks back to work at family-level wages.

Instead of the endless talk about solutions, let's enable the South Lake Union district to evolve into a leader and example of Seattle's forward thinking perspective on functional urban development.

Thank you,  
Tim Matthews

Holmes, Jim

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**From:** JJ Mckay  
**Sent:** Wednesday, March 23, 2011 11:32 AM  
**To:** DPD\_Planning\_Division  
**Subject:** South Lake Union

I live in Belltown and spend time in South Lake Union as a volunteer with two organizations in the area, as a diner in the increasingly active restaurant scene, as a biker in the neighborhood and as a business person in some of the many companies that are located in the area.

The direction of more people living in SLU is a sound choice for our community. I have several friends of all ages living in the area...including families and retirees who are downsizing their lifestyle and want a "city experience".

Increased density in SLU would be benefit for all concerned. It uses existing city infrastructure and reduces urban sprawl and plight. It would also reduce commutes with the use of the tram/bus system opening up all of downtown. With fewer empty asphalt lots, you would have fewer eyesore and heat islands. In addition, you could encourage developers to increase the number of pocket parks that are very popular.

This would also allow our city to expand its "walkability" factor like NYC, DC, San Francisco and other areas.

I only hope we continue forward with an increased density plan for SLU which not only is positive for their neighborhood, but benefits downtown, Belltown, and Queen Anne.

Thank you very much,

JJ McKay

Holmes, Jim

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From: Jan McLaughlin  
Sent: Sunday, March 20, 2011 11:26 AM  
To: DPD\_Planning\_Division  
Subject: Comment on the draft Environmental Impact Statement for South Lake Union

Seattle Department of Planning and Development  
Attn: James Holmes

It has come to my attention that the City has released the *South Lake Union Height & Density Draft Environmental Impact Statement*, beginning the process of upzoning South Lake Union. I wanted to share with you my perspective.

Downtown Seattle and the nearby neighborhoods have been a part of my life my entire professional life—and before when I used to visit regularly from the Eastside. Growing up on the Eastside, I have seen what sprawl can do.

Today I walk or take the bus downtown to my athletic club, to meet friends for dinner and a movie, to shop and to take in the museum, parks and other cultural amenities. I will frequently walk from the downtown core to South Lake Union and then catch the #8 bus home. I am especially eager to see MOHAI relocate to the historic Naval Reserve Building in Lake Union Park. It will help continue the revitalization of the neighborhood just as Lake Union Park and the Olympic Sculpture Park have for their respective waterfronts. Just as the Sculpture Park and Downtown Public Library finally put Seattle on the national and international map for architecture and innovation, an aggressive and progressive choice in South Lake Union will do the same. More buzz leads to more visitors and more residents and businesses relocating here. More people and more businesses lead to more tax revenue, helping to support public benefits.

Of course, we need more people and taller buildings in South Lake Union to support the shops, stores, restaurants and other amenities it has to offer—and will offer. As a member of the baby boomer generation, I know many who are downsizing and are eager to move into the city. More multi-family housing options and more amenities will encourage them to chose South Lake Union. With this realized, we will finally see a greater synergy among Downtown and it's immediate neighbors—Uptown, Queen Anne, Belltown, Denny Triangle, Capitol Hill, and more.

South Lake Union is central—blocks from Downtown and easy to get to from other neighborhoods. It's where we should plan for more growth. I am writing in support of Alternative #1 because it allows the most flexibility in building design and would accommodate the most people and jobs.

Sincerely,

**Jan M. McLaughlin, CSP**  
**Your Communication Connection**  
*helping professionals create positive responses*  
Tel: 206.328.0080 Fax: 206.323.5954  
<http://YourCommunicationConnection.com/>

Check out our blog: <http://www.JanMcLaughlin.blogspot.com/>

**Holmes, Jim**

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**From:** Terry Miller  
**Sent:** Thursday, March 31, 2011 8:36 AM  
**To:** DPD\_Planning\_Division  
**Subject:** South Lake Union

Dear Seattle DPD,

As co-owner of the building at 9<sup>th</sup> Avenue North and John Street in South Lake Union and as a tenant of the building that serves as headquarters for my company, Schultz Miller, Inc., I am writing to support Alternative 1 in favor of greater allowable height and density in South Lake Union.

Greater height and density favors those of us in South Lake Union, where everything is already in place for more people:

- Bus and streetcar service
- More than a dozen new eateries
- Whole Foods supermarket
- Ample parking on-street and in lots
- Plenty of open space with Denny Park and the upgraded Lake Union Park
- Easy access to nearby shopping malls, Belltown, Seattle Center, and downtown

It also makes sense to increase height and density in South Lake Union, which has already been designated an Urban Center, to enable other neighborhoods to remain at lower densities.

For these reasons, I strongly support Alternative 1.

Thank you for your time and consideration.

Sincerely,  
Terry Miller, Partner  
Schultz Miller, Inc.

Terry Miller  
**Schultz | Miller**  
Office: (206) 281-1234 x802  
Cell: (206) 551-9660  
Fax: (206) 233-9060

As a South Lake Union resident I would like to express my concern over the height and density rezoning proposals of the draft EIS. I understand that this area has been declared an urban center and huge increases in housing and employment targets were set in 2004. Even these targets could be met by the existing zoning so there was no justification for the growth target projected out to 2031 being even steeper than that already approved.

1

I cannot believe anyone would seriously consider the first alternative proposed with its potential for 300 foot towers in the first block above the lakeshore park and restaurants. Neither alternative 1 nor 2 has any real step down to allow the taller towers at the south end of the area to be developed with common areas such as lounges and roof-top gardens on their upper levels that would enjoy panoramic views of the lake and be selling points for units on lower levels. Even alternative 3 has the potential for towers just above the lake that are as tall as the tallest buildings allowed in the current zoning and has much too large an area from John to Mercer with no step down at all.

2

I would hope the existing zoning would be preserved as in alternatives 3 and 4 for the Cascade neighborhood all the way to Fairview. This area is already largely developed with a pleasing variety of buildings that accommodates some affordable housing, churches, a park and p-patch and some newer apartment complexes and businesses.

3

I did not choose to move downtown, but wanted to be close to the downtown area. It seems these plans allow for excessive growth without infrastructure. If one wants to attract families to maintain residential diversity throughout the area, plans should be made before development proceeds for at least an elementary school and a library and more park space. A public open area such as that at the UW Medicine building has absolutely no appeal for the public. Mitigating factors for exceeding height limits such as a payout for affordable living to be provided elsewhere is totally unacceptable.

4

Traffic would likely be a nightmare with the build out of any of these proposals. I love being able to walk downtown and use buses whenever I can, but I have not given up my car. I drive to areas that are not conveniently served by bus routes, especially in the evening, and to leave Seattle proper. I am sure that would be true for many potential residents. Along with the proposed opening of John and Thomas to Seattle Center, I fear the traffic will become unacceptable throughout the neighborhood.

5

Thank you for considering my comments.

Christine Moss

Holmes, Jim

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**From:** Thomas Mulica [tommulica@gmail.com]  
**Sent:** Friday, April 08, 2011 9:06 AM  
**To:** Holmes, Jim  
**Subject:** ALT 1 SUPPORT SLU

Hello,

I wanted to write a quick note in support of greater density in SLU and specifically for ALT 1. Density will do much to improve the safety and livability of this area. | 1

Thanks,

Tom Mulica

Holmes, Jim

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**From:** Jeffrey Munger  
**Sent:** Monday, April 11, 2011 10:52 AM  
**To:** DPD\_Planning\_Division  
**Subject:** Greater height / density in South Lake Union

As a resident of the City of Seattle (Fremont) and with a professional focus on urban planning and economic development, I wanted to pass along my support of greater heights and densities in the South Lake Union Urban Center. 1

At this critical stage of the area's development / redevelopment, I feel it is important to create a dense, walkable neighborhood with a rich variety of uses and heights. Portland's Pearl District serves as a striking example of an area with these characteristics, as there you will find an impressive mix of residential, retail, and office uses in a very diverse collection of buildings (from old warehouse facilities to modern high-rise condominiums / apartments). South Lake Union has an even more impressive corporate presence, but now that the vast Amazon.com campus is getting built-out (as well as the Gates Foundation campus nearby), it is now imperative that the city not "promote" a sterile suburban office park atmosphere through overly restrictive building ordinances.

I also feel it is also important to allow higher densities and building heights to support the existing transportation network (i.e. - streetcars), as well as fuel that network's expansion. I would like to see the streetcar system expanded to the University District, as well as Fremont / Ballard. Future expansion would converge in South Lake Union, thus the city should capitalize on this investment by supporting density and creating a thriving business and residential urban center.

Thank you for your consideration.

Best regards -

Jeffrey Munger

Holmes, Jim

From: Michael Muratore [mmuratore@panpacific.com]  
Sent: Monday, April 11, 2011 2:57 PM  
To: DPD\_Planning\_Division  
Subject: Comments on proposed zoning changes

Hello,

I would like to offer my comments on the proposed zoning changes in South Lake Union. I have worked in downtown Seattle since 1995 and in South Lake Union since 2008.

Currently I am employed at a hotel located in the Denny Triangle and have personally experienced the recent flourishing of the area and would like to see this continue.

Being able to build taller buildings will create opportunities for more housing options as well as bringing more businesses to the area.

In the past 16 years of working in Seattle, I have seen a number of significant changes for the better; new stadiums; new hotels; expanded convention center and a number of new commercial and residential buildings.

It makes sense to me to allow for additional growth by updating the zoning in this area.

Thanks for your consideration.

**Michael Muratore | Director of Finance**

[panpacific.com/seattle](http://panpacific.com/seattle) | [panpacificseattletour.com](http://panpacificseattletour.com)

**Pan Pacific Hotel Seattle**

2125 Terry Avenue, Seattle, Washington 98121

D: 206-654-5020 | F: 206-654-5048 | [mmuratore@panpacific.com](mailto:mmuratore@panpacific.com)



**Global Hotel Alliance (GHA)** is the world's largest alliance of independent hotel brands. GHA currently includes brands such as Anantara, Doyle Collection, First, Kempinski, Leela, Marco Polo, Mirvac, Omni, Pan Pacific, PARKROYAL and Tivoli, encompassing over 260 upscale and luxury hotels with over 60,000 rooms in 47 different countries.

To book or for further information visit [www.gha.com](http://www.gha.com).

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Seattle Washington  
April 9, 2011

Seattle Dept. of Plan. + Dev.  
Attn: Jim Holmes  
700 Fifth Ave. Suite 1900  
P.O. Box 34019

Dear Jim

My name is Mary Ann Napravnik. I am very interested in South Lake Union and its future as many Seattleites are.

I have been a member of Immanuel Lutheran Church since 1970 when my husband (dec.) and I joined. Our home was at Lakeview Lane in Madison Park right next to Washington Tower. I remember all of the structural damage issues etc. Not that it has all that much to do with the current and future issue of high rise in S.L.U. - but I'd like to believe that no one wants to change the character of our community.

I know and believe that change and building will come. To make S.L.U. a look alike to centers or downtowns with masses coming to work and

leaving again at the end of the day is not community.

I've certainly not read every word of the document but levels 1<sup>st</sup> + 2<sup>nd</sup> seem over the top. Growth will continue - making it not just another office building should be a consideration.

Sincerely,  
Mary Ann Napravnik

Holmes, Jim

---

From: RuthenFrank [ruthenfrank@nortonmiddaugh.com]  
Sent: Monday, April 11, 2011 2:55 PM  
To: DPD\_Planning\_Division  
Subject: South Lake Union Draft EIS

James Holmes,

As residents, we have a direct and vital interest in the development and growth of the South Lake Union area. This is a special opportunity for planning of a Seattle Urban Center. It deserves careful consideration and some restraint so as not to become just another high-rise "downtown".

Alternative #3 is the most acceptable option although it, too, falls short of ideal. Current zoning should be maintained in all of Cascade, including the area between Fairview and Minor, in order to provide light to that neighborhood. There should be a step down of building height from Denny to the lake. There should not be towers in the Mercer/ Valley strip. There should be provision for school, libraries and amenities to make this a true neighborhood. It also means that zoning must be such that it encourages a real diversity of residents. Any bonuses allowed through contributions to affordable housing should stay in the South Lake Union neighborhood and support diversity. 1

Alternative #1 goes much too far. It destroys the existing Cascade neighborhood and overwhelms the area. Having structures up to 300 feet high rimming Lake Union would be a disaster.

Respectfully,

Ruthe and Frank Norton

**Holmes, Jim**

---

**From:** Richard Novy  
**Sent:** Monday, April 11, 2011 1:25 PM  
**To:** DPD\_Planning\_Division  
**Subject:** Lake Union

As new residents to the SLU area we are very concerned to what is proposed. We moved there because we love the area and believed in the great potential for the area. When considering for the future you have only one chance and need to make it right. The beauty of the area and the lake views must be preserved for all. Buildings that have both style and functionality should be allowed not boxes and squares. The increased traffic density begs for more light rail with the density comes air quality concerns. The residents need shopping a smaller version of U Village is do-able. I am saying please think of the beauty of the area and concerns of the residents; when something is planned make it do the area proud. We are proud to say we live there now and want the future to be even better.

Rich and Ann Novy

Sarah Rose Nottingham

April 11, 2011

Seattle Department of Planning and Development  
Attn: James Holmes  
700 Fifth Ave., Suite 1900  
P.O. Box 34019  
Seattle, WA 98124

Mr. Holmes:

It's time to develop South Lake Union. Seattle's population is growing and SLU is the perfect place for people to invest in.

Microsoft, Amazon, Tom Douglas, Christine Keff and many more have taken an interest in this prime location and it's time for individuals to have that opportunity as well.

Walking through SLU during the day is like walking the streets of thriving city. There are people going to work, walking their dogs, running, walking, biking, shopping, etc.

Walking through SLU after 6:00 PM, however, is another story. Business is [mostly] done for the day and everyone has gone home. The sidewalks are empty and there is an unsafe atmosphere. People don't take advantage of the restaurants, businesses and nightlife in the SLU neighborhood because no one lives there. People bring money, safety, active lifestyles and more people.

We need "people-sized buildings", parks, local retail and restaurants, nightlife. The Development of SLU is offering all of this.

Few people want to live in the heart of downtown because the skyscrapers aren't "people friendly", and even less want to live in SODO because there seems to be nothing available for pedestrians.

I'm looking forward to South Lake Union building high and becoming a bustling, successful community where people live shop and enjoy their surroundings.

Thank you,

Sarah Rose Nottingham

Holmes, Jim

---

**From:** Kathleen O'Brien <kathleen@obrienandco.com>  
**Sent:** Monday, March 28, 2011 4:11 PM  
**To:** DPD\_Planning\_Division  
**Subject:** Comment on Rezoning of South Lake Union

O'Brien & Company, Inc, founded in 1991 is the oldest green building consultancy in the Northwest. We have been a proponent of sustainable development such as that exemplified by the South Lake Union District and have had the privilege to provide guidance on many of the green buildings in the District, including those developed by Schnitzer and Vulcan Real Estate.

Done well, density is key to making neighborhood services work, reducing car travel, and providing urban "vibrancy." This project has been used in other parts of the country as a best case scenario. It is a good use of existing infrastructure investments, while enhancing livability. It does not make sense to hamstring future development that builds on this good solution. I support progressive and thoughtful use of density and height. I do not support Alternative 4. My preferences are Alternative 2, 3, and 1.

Kathleen O'Brien, LEED AP, CSBA  
kathleen@obrienandco.com · 206-621-8626 EXT 115 Tel · 206-621-8649 Fax  
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Author: The Northwest Green Home Primer  
Editor: Building Capacity Blog

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8 April 2011

James Holmes  
 Seattle Department of Planning and Development  
 700 Fifth Avenue, Suite 1900  
 P.O. Box 34019  
 Seattle, WA 98124-4019

Re: Draft DEIS Comments

Dear Mr. Holmes:

My firm is an urban design consultant for Vulcan, one of the stakeholders in South Lake Union. We were retained by Vulcan in 2004 to explore urban design and planning concepts for South Lake Union. Our studies recommended the reconfiguration of Valley and Mercer, the creation of a new waterfront district, new connections across Aurora, a street car, and development guidelines for new research and office development in SLU. It is rewarding to see the dramatic transformations that have occurred in this exciting part of Seattle.

Vulcan invited our firm to independently review the draft DEIS and offer constructive comments to aid you in your efforts. Knowing that your approach to understanding urban form in this document may influence future zoning changes, we wish to challenge the validity of the "Podium" as an appropriate and feasible development model for SLU.

"Podiums"

*Extract from page 3.10-17*

*Height, Bulk and Scale*

*Alternatives 1 through 3 propose a relatively new building typology for the South Lake Union neighborhood. The new building type would feature a high-rise tower with a limited floor plate area positioned atop a bulkier low-rise podium that would potentially fill the site from property line to property line.*

1

PRINCIPALS

BARRY J. LONG JR., AIA, LEED AP  
 PAUL B. OSTERGAARD, AIA  
 ROB ROBINSON, AIA  
 GAIL A. ARMSTRONG, SDA  
 DAVID R. CSONT, ASAI

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 ERIC R. OSTH, AIA, LEED AP  
 MARGARET M. CONNOR, LEED AP

*Extract from page 3.10-18*

*Podiums at the base of the towers would provide the towers with a visual base and create a clear edge along the street.*

The DEIS introduces the concept of a “podium,” a low-rise bulky building mass potentially filling a block with towers positioned above it. This is not new to planning in SLU. Previous studies for the Mercer Blocks have utilized the podium concept to provide the basis for determining appropriate building heights and tower placement. These studies have illustrated low rise buildings that form a monolithic base with towers located on top sometimes 50’ or more back from the nearest street. We challenge this model.

Developers do not build podiums. They build buildings. Very seldom will a developer build a single mixed-use building that fills an entire development block. Blocks in South Lake Union including the most recent developments by Vulcan are developed on a building-by-building basis. Office/research buildings with ground floor retail are almost always financed separately from residential projects. A typical block may be built in two or more phases of construction depending on market timing and tenant availability. Blocks are almost always divided into parcels.

Podiums as described in the DEIS create the false premise that entire blocks can be filled with a building mass and towers above can float to deep mid-block locations divorced from the street and entirely lacking a street address. This places unrealistic constraints on building massing and practically mandates a very complex approach to development that can’t be financed in today’s markets. The podium concept separates the residential tower from the street with an intermediate low rise building mass. It proposes stacked buildings rather than side-by-side buildings. Developers seldom build stacked buildings.

“Building Types”

A far more sound approach to regulating form is based on building types acceptable to South Lake Union that are known to the development world and

1 cont

2

commonly built in the Seattle area. These may include retail buildings, office/research buildings, mixed-use building, single-family houses, townhouses, apartment buildings and civic buildings. Rules can be created for these building types to control their siting, massing, street frontage, and character. This form-based approach to zoning can be drafted to eliminate confusion and doubt about what is permitted. Essentially, your code can clearly delineate by-right building form and use. Ambiguity about what the code permits is minimized.

For example, a normal "apartment building" will have a set of design controls that may include a minimum parcel size, access controls, a required street entrance, mandated building setbacks, mandated upper story stepbacks and permitted building heights. Form controls for residential buildings can include limited floor plate sizes above a certain level as proposed in the DEIS. This same approach can apply to other building types. These regulations are based on realistic parcel sizes and building types that can be developed as individual building projects.

The podium concept will yield regulations that place unreasonable massing controls that do not work on a parcel basis. In addition, they have the potential of unintentionally creating a miserable environment of massive building walls, little block porosity, inhuman building scale and boring streets.

We hope this information is useful to your team as you refine your recommendations.

Sincerely,



Paul B. Ostergaard, AIA  
Executive Vice President

2 cont

3

Holmes, Jim

---

**From:** Kini Sanborn Parente  
**Sent:** Monday, April 11, 2011 8:02 PM  
**To:** DPD\_Planning\_Division  
**Subject:** Pro - SLU Height & Density

Dear Mr. Holmes:

I work in the SLU neighborhood and have for more than a year now. In such a short amount of time, this tiered - previously sleepy area has transformed into a such a vibrant area garnering national attention. The density of people is so so important to the grown of downtown Seattle. Small businesses need residents to strive, offices are essential to the dynamics of the local economy, and open spaces where people can gather are a part of any successful city planning.

It is my great hope that you will encourage the density and height proposals for the neighborhood. It is so exciting to see the current development and I can really see that with more opportunity for growth such as this, SLU will become the new 'South of MOMA' (South of Market in San Francisco) or the new 'Yorktown' (Vancouver) of our city. If we do not continue to develop in this manner, we will continue to loose out to the eastside where this development and planning are fully underway. When I travel to NYC and tell them about SLU and all the exciting developments, it is building attention and interest to bring new visitors to our city. For increased revenues from tourism, increased tax prosperity of the region, and for successful urban living, the develomement in SLU should be a no-brainer. Our surrounding neighborhoods demand its growth for their own survivals.

Please take these comments seriously as you make your decisions about the Environmental Impact of this area. It is the future of Seattle and the future of so many jobs for our region. In these times, most cities would dream to have this sort of opportunity in front of them.

Most Sincerely,

Kini Parente

**Holmes, Jim**

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**From:** Brad Parrish [mailto:[bparrish@standardparking.com](mailto:bparrish@standardparking.com)]  
**Sent:** Monday, April 11, 2011 4:33 PM  
**To:** DPD\_Planning\_Division  
**Subject:** South Lake Union Height & Density Draft EIS

To Whom It May Concern:

I strongly support the height and density proposal for SLU as an individual resident of Seattle and a long time business operator in the SLU for the past 11 years. My background in urban planning, desire to have a vibrant city and concern for the cost of sprawl leads to my support. Specifically I support what is proposed for the following reasons:

1

- More people living and working in the SLU area creates a vibrant community for retail density that promotes walking and biking as opposed to vehicles.
- The height and density will use the existing infrastructure effectively and allows for more innovative design that would include pocket parks as opposed to block buildings with no open space.
- The height and density will allow for a greater range of housing choices and prices.
- We cannot take what has happened in SLU for granted with the likes of Amazon.com, Path, Microsoft and Group Health choosing to locate there – for this area to thrive there needs to be an even greater push to build upon what has already begun. Companies have multiple choices of where to locate in the new economy.
- If the growth does not go into SLU where will it go – there are limited locations that have such a great infrastructure as that which is provided in SLU.

Thank you,

Brad

**Brad Parrish**

VP Regional Manager  
[bparrish@standardparking.com](mailto:bparrish@standardparking.com)  
206.381.8552 ext.11(Direct)  
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King, Donna

**From:** Craig Parsons [craigp@senecagroup.com]  
**Sent:** Friday, April 08, 2011 3:13 PM  
**To:** DPD\_Planning\_Division  
**Cc:** Holmes, Jim; LaClergue, Dave  
**Subject:** South Lake Union DEIS Comments

Dear Sirs;

I reside in the Ravenna neighborhood and work in downtown Seattle. To curb both residential and commercial sprawl, I support the increased density proposed in the Draft EIS. The proper development of that neighborhood will be benefit from the flexible zoning proposed herein, and from the removal of archaic block-by-block zoning differences. As a former Seattle Design Review Board member (NE), I believe that the increased density will allow for a variety of uses and building forms that will enable a richness and diversity in South Lake Union.

With my support, I must also offer some concerns that I hope may be addressed:

- Peoples’ ability to relocate to SLU is severely limited by the absence of public school alternatives there. It makes no sense to live there, only to have to commute back to neighborhood schools. As a customer of an over-burdened and under-funded Seattle Public Schools system, I believe that added residential density here must be coupled with a vehicle to fund designated school projects in the immediate SLU vicinity. I believe this is in part the obligation of developers adding residential capacity in the heart of this underserved region.
- The power infrastructure in the SLU neighborhood is widely known to be insufficient – even abhorrent according to some. City Light has been burdening developers with providing network-ready transformer vaults. However, it is unclear whether any progress has been made to design or fund the network electrical service to the neighborhood. Overtaxed substations already provide sub-optimal power quality, and this situation will only worsen until real investment is made in the infrastructure.
- Lastly, I do not want my support for added density to be misconstrued as support for the street car system. I believe this system to be have much higher cost that a bus/BRT system, yet the infrastructure costs are extreme. I also know firsthand that the tracks pose serious hazards for bicycle commuters and the disabled.

Thank you.

Craig Parsons

Principal

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Holmes, Jim

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**From:** Giselle Pavlovec  
**Sent:** Thursday, April 07, 2011 8:10 PM  
**To:** DPD\_Planning\_Division

Dear Mr. Holmes:

Our family strongly supports the rezoning proposed in the South Lake Union Height and Density Draft Environmental Impact Statement, especially Alternative 1.

We have lived and worked in Seattle since 1994. Our home is in Capitol Hill, and our sons attend school in the neighborhood. We love living in the City, and we almost exclusively frequent stores and restaurants in Capitol Hill, South Lake Union (SLU) and other Seattle neighborhoods.

Brian is a structural engineer who contributed to the design several Seattle landmarks, including Seattle City Hall. His projects in SLU include Seattle Cancer Care Alliance, Fred Hutchinson Cancer Research Center and UW Medicine Lake Union.

Since we have moved to Seattle, the changes in SLU have been amazing. Fred Hutch has grown; REI, UW Medicine, Amazon and others have moved into the area. If the City adopts Rezoning Alternative 1, SLU will become even better.

SLU needs more housing to create a thriving neighborhood. The entire city also needs more housing downtown to create a more sustainable metropolitan area. Too many people spend too much energy and time commuting.

The current zoning encourages massive low-rise buildings that are too common in Capitol Hill. Allowing taller buildings in SLU will lead to more people and more revenue. Taller buildings also result in more elegant design and public benefits such as open space and affordable housing.

Please adopt Alternative 1.

Sincerely,

Brian and Giselle Pavlovec

Holmes, Jim

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**From:** william.pearson  
**Sent:** Wednesday, April 06, 2011 8:44 PM  
**To:** DPD\_Planning\_Division  
**Subject:** eis

The proposed growth in the next twenty years would destroy our whole Seattle landscape. The height of the buildings is too extreme. The Space Needle will be a "needle in a haystack." There needs to be a height limit an a limit of towering buildings in the downtown corridor. Perhaps going South, eg: SODO area for buildings. We do not have enough schools or roads to accommodate all the increased demands of transportation. | 1

Sincerely,  
W.Pearson

**Holmes, Jim**

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**From:** John Pehrson  
**Sent:** Monday, April 11, 2011 9:19 AM  
**To:** DPD\_Planning\_Division  
**Subject:** South Lake Union Height and Density EIS  
**Attachments:** DEIS response-final.doc

Jim Holmes,

Attached are my comments on the subject. They are extensive, but the document is 659 pages long.

I would add one overall impression. The document deals with issues in 'silos' on each environmental element, but the impact of multiple issues or elements counts. I have tried in my comments to integrate some of those elements in specific areas of interest. Such fusion, I believe is instructive on where specific kinds of growth is prudent and where it isn't. | 1

thank you.

John Pehrson

April 8, 2011

**Comments on SLU Rezone Draft EIS**  
**John Pehrson, Past President, LUOA Board of Directors**

**A. Section 1.7**

On page 1-55, it states "There are no significant unavoidable adverse impacts identified for any of the elements of the environment, except Transportation." This is absolutely false for other elements beyond Transportation. The following is only a sample of impacts that are 'significant and adverse'. They are avoidable only if the underlying Alternative is materially changed.

1. Building heights allowed that would impinge upon airspace and aircraft flight
2. Wind wakes from buildings that would make landing and takeoff on the lake unsafe
3. Wind wakes from buildings that would adversely affect sailing now enjoyed by thousands on the Lake Union.
4. Building towers in an area of potential liquefaction
5. Destroying the 'step-down' zoning of concept of SLU and thereby adversely impacting the environment of existing residents and workers (in SLU and adjacent neighborhoods) that is currently protected by zoning regulations
6. Impacting the views from designated Scenic Routes.
7. Noise impacts on occupants of buildings allowed by these alternatives that would surround the landing and takeoff paths of aircraft
8. Lack of any tower spacing requirement for residential and commercial towers
9. Shadow impacts on Lake Union Park and SLU residents
10. Proposing population increases of up to 30,000 and no provisions for children (schools, play grounds, affordable family housing).

**B. Growth Target Analysis**

On Page 2-7 "Growth Targets" the City has assumed extremely aggressive growth targets for SLU for the period from 2024 and 2031. These are inappropriate and should not be used or considered for any purpose. First, they are not a part of a rationale, comprehensive allocation of growth beyond the 2024 growth targets across Seattle and they are not a part of the City Council approved Seattle Comprehensive Plan. Second, with the very aggressive growth targets for SLU through 2024, SLU would clearly be the urban Center with the most intense development (housing and commercial) outside of Downtown and about 50% beyond those adjacent Urban Centers. Charts on this have been provided to the City under previous cover and are attached. Use only growth targets from the Seattle Comprehensive Plan.

**C. Tower Spacing and limitations**

1. There is no tower spacing proposed, so towers could be 18' apart. There should be an absolute tower spacing requirement of 100'. Otherwise the environmental impact of 400' towers 18' apart must be considered.

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Comments on SLU Rezone Draft EIS  
John Pehrson

2. Limiting towers to lots of 22,000 sq. ft. does not limit to 2 towers per block. If developers get or have an alley vacation, blocks can be as much as 79,000 sq. ft., allow 3 towers per block.

**D. Flight Path issues**

1. On page 1-35 there should be a safety buffer beyond the defined flight paths both vertically and horizontally.
2. Wind analysis should clearly show the limitations on tower height in the blocks surrounding Lake Union and Lake Union Park.
3. Wind analysis should result in definitive reductions in height from Denny Way to water. It is only addressed in general.
4. The impact of building wakes on sailboats all over Lake Union must be considered. Those impacts, because subtle changes can affect sailboats, will be much more widespread.
5. On Page 2-9, in section 2.2.3, Figure 2-4 only shows the flight path to and from the Southwest portion of Lake Union. We have understood, and have certainly observed, flights over the Southeast portion of Lake Union. Why is this not shown and taken into account?
6. Page 1-13 Noise impacts, inadequately differentiates between Alternatives #1 and #2 from the existing zoning. In the former, the aircraft would be landing and taking off between 240' or 300' towers. In #4 all buildings are below the flight paths. Remember the 'third runway issues'. This factor is also ignored on page 1-32 and clearly mitigation is necessary if towers are to surround the flight paths. This environmental issue is real, whether Seattle's noise codes recognize it or not.
7. Page 1-15 states that there is no problem because building height limits would remain, as they currently exist. This is false. There is no problem because the current zoning limits do not impinge on or surround the flight path.

**E. Step-down to the Lake**

1. Step down is de facto Seattle Policy (see downtown and Belltown and current SLU zoning) so should be recognized. Benefits of step-down should be more clearly stated.
2. Page 1-18 the top row is full of falsehoods in characterizing Alternative #1 and #2 as step-down. See attached three Step-down charts that clearly show that fallacy. This must be corrected.
3. Page 1-35 "Wind Analysis" should specify some degree or scope of the step down required to eliminate wind impacts on aircraft landing and taking off and on sailboats on the lake.
4. The impact of destroying the 'step-down' zoning concept of SLU and thereby adversely impacting the environment of existing residents and

April 8, 2011  
Comments on SLU Rezone Draft EIS  
John Pehrson

workers (in SLU and adjacent neighborhoods) that is currently protected by zoning regulations must be recognized in the final report.

**F. Cascade Neighborhood Zoning**

All of Cascade should be protected, as it is about 75% built out and has developed its own neighborhood character, with diverse housing, market rate housing, small commercial buildings and human services.. All the blocks of Cascade should be included, including all those between Fairview and Minor.

**G. Diverse Housing**

1. On Page 1-16, the report needs to explain how increasing the allowed zoning density (increasing the land values) increases the amount of low-income housing.
2. On page 1-16, the report needs to explain how increasing the allowed zoning density increases the construction of affordable housing. High-rise housing is the most expensive per square foot and has no record of its use as low-income housing. Alternative #1 and #2 zoning would eliminate new low-income housing in SLU.
3. On page 1-16, it says Alternative #4 would reduce development of low income housing, even though zoning of 65', 75' and 85' encourages wood over concrete, a more affordable housing construction, and universally used in Seattle for subsidized housing. This zoning has encouraged significant low-income housing in Cascade and the rest of SLU. Correct this false statement.

**H. Schools and Family Friendly issues**

Schools and family-friendly issues should be addressed under Public Services and Utilities per SMC 25.05.444. Per the Draft EIS there are, as of 2009, about 2940 Housing Units (about 4410 people based on 1.5 people per housing unit). The residential capacities and increases from 2009 numbers is shown below:

Alternative	Residential Capacity	Increase from 2009
#1	35,874	31,464
#2	32,943	28,533
#3	26,941	22,531
#4	21,636	17,226

These kinds of population growth represent the equivalent of a small City. We see no provisions for a family-friendly environment, like schools and sports playfields and special considerations for multi-bedroom, affordable units. Further, particularly for Alternative #1 and #2, the predominate residential building form will be a high rise apartment/condo tower, the most expensive form of housing and the most unaffordable for young families. Does the City plan for this neighborhood to be devoid of children, with the resultant negative impact on

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Comments on SLU Rezone Draft EIS  
John Pehrson

community (stability, safety and comfort)? What provisions are there for school sites, playfields for children and young adults, more economical housing types like townhouses or five floors of wood over concrete? This void must be corrected in the Final EIS.

**I. Aesthetics**

1. Sections 2.3.3, 2.3.4, and 2.3.5 define the three alternatives with increased zoning. All allow about a 75% increase in bulk and scale for commercial buildings throughout most of SLU. Current zoning allows FAR of 3, 4, 4.5 and 5 for an average of 4. These alternatives allow FAR's up to 7 with bonuses. There is only one building currently in SLU with this bulk/FAR, and that is on Boren between Thomas and Harrison. A second such building is just starting on Boren between Thomas and John. These are a result of a special concession granted to Vulcan/Amazon, increasing the FAR from 3 to 7. The impact of 20 to 25 such buildings in SLU, two or more to the block, has not been adequately considered in this EIS. Not only is the bulk oppressive, but by taking credit for a large lot, they can also be high. The alternatives allow these 24,000 sq. ft. floor plates up to 240' high! Compared to residential towers of similar height, these buildings (using the example of the current building) are bland with no decks so they lack life and have over twice the horizontal impact or bulk. In addition their street level facades are monotonous for entire blocks. This is inherent, as the architects design a solid base to mount the bulky tower. All the emphasis seems to be the impact of residential towers on aesthetics, light, glare, shadows, air circulation and wind impacts on others. These analyses must also include a representation of these bulky, boring commercial buildings throughout SLU and their impact on the environment.
2. Page 1-18, second row, gives a very misleading statement, implying that the towers proposed are slim. Towers in Vancouver are about 6,000 sq. ft.. Towers in Belltown are from 7000 to 8000 square feet. In Belltown, 8,000 sq. ft. towers not a legacy of the past; 8000 sq. ft. towers up to 240' in height are being proposed today. These SLU towers are 10,500 square feet on top of bulky podiums of 45' to 85'. This document should reflect these appropriately. Two or more of these per block, and on tens of adjacent blocks would be oppressive and that impact must be considered.
3. Page 1-17 ignores the impact on adjacent neighborhoods of the residential towers on the area context and view. This includes Capital Hill, Denny Triangle, Belltown and Uptown.
4. Page 1-17 ignores the impact on area views within SLU that are currently protected by current zoning and would be totally destroyed in different amounts by Alternatives 1,2 and 3.
5. Page 1-17 ignores the fact that for some blocks, the proposed podiums are twice as high as the total allowed height under current zoning. (e.g. blocks between Mercer and Valley)

April 8, 2011  
Comments on SLU Rezone Draft EIS  
John Pehrson

6. Page 1-17 trivializes by statements like "similar to but less than Alternative 1". Professionals should be able to do better than that.
7. Page 1-18 'Viewsheds' is just plain false. These alternatives do impact views; they just don't totally wipe them out. Losing the supporting structure of the Space Needle is an impact on the view of the Space Needle. Views from carefully selected points that 'frame' the Space Needle between distant towers is 'cherry picking'.
8. Page 1-18 'viewsheds' should also take into account view impacts from within SLU and from non-designated viewpoints. This is a potential rezone, and not an individual project; so all views are in play.
9. Page 1-18 'viewsheds' says all view impacts from all alternatives are similar. This is false to any reasonable person. This must be corrected.
10. Page 1-18 'viewsheds' must list impacts to each scenic route specifically and the extent, by alternative, that these are compromised.
11. Page 1-39 discusses views from protected viewpoints, but this area rezone must consider general views also.

**I. Shadows -**

1. Page 1-19 Shadows is entirely unacceptable. To say that the shadow impact of Alternative #1 and #4 are similar throughout the day is not factual.
2. Page 1-19 Shadows should be based on quantified data in some manner. Professionals should be able to quantify by sq. ft. of shadows or blackness of the area to allow rational comparisons to be made.
3. Page 1-19 shadows on Lake Union Park should be highlighted for all four seasons but particularly from September to March, critical months for light in Seattle.
4. On page 1-30, 'Plants and Animals', the different shadow impacts of the 4 alternatives on plants should be discussed. Obviously Alternatives #1 and #2 have greatest and most profound impact.
5. On page 1-40 under 'Shadows', it merely lists what is in the land use code. Which of those is recommended in this general case and how much to mitigate the huge increase in shadows?

**K. Blocks South of Lake Union Park, between Valley and Mercer**

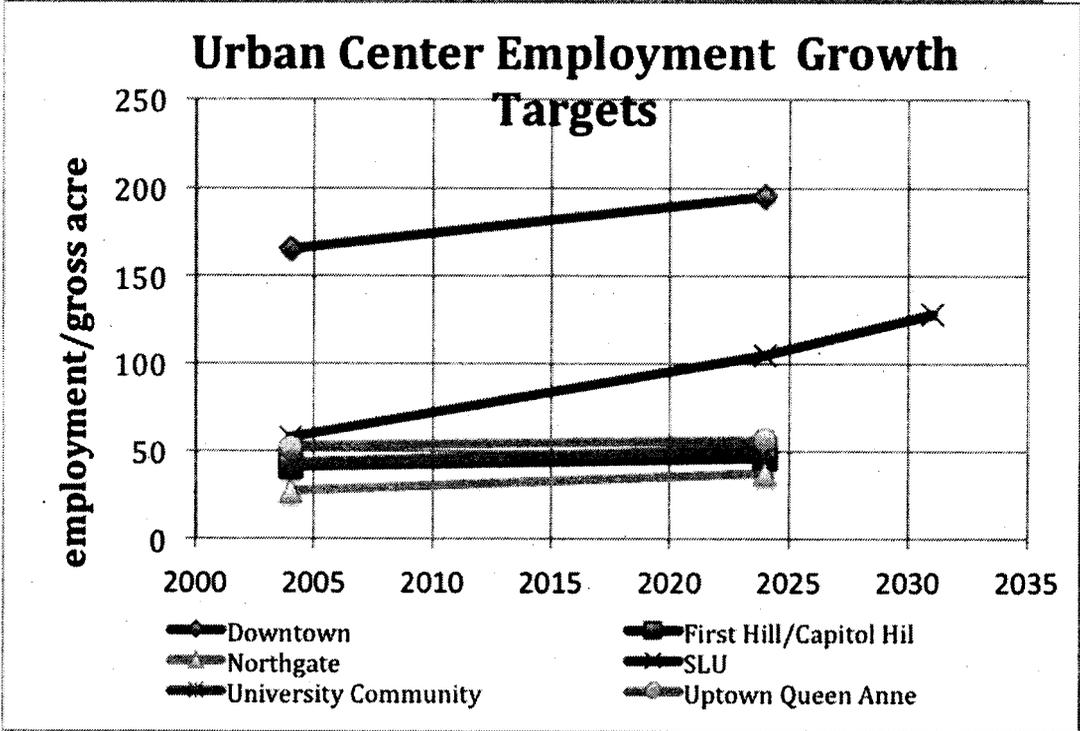
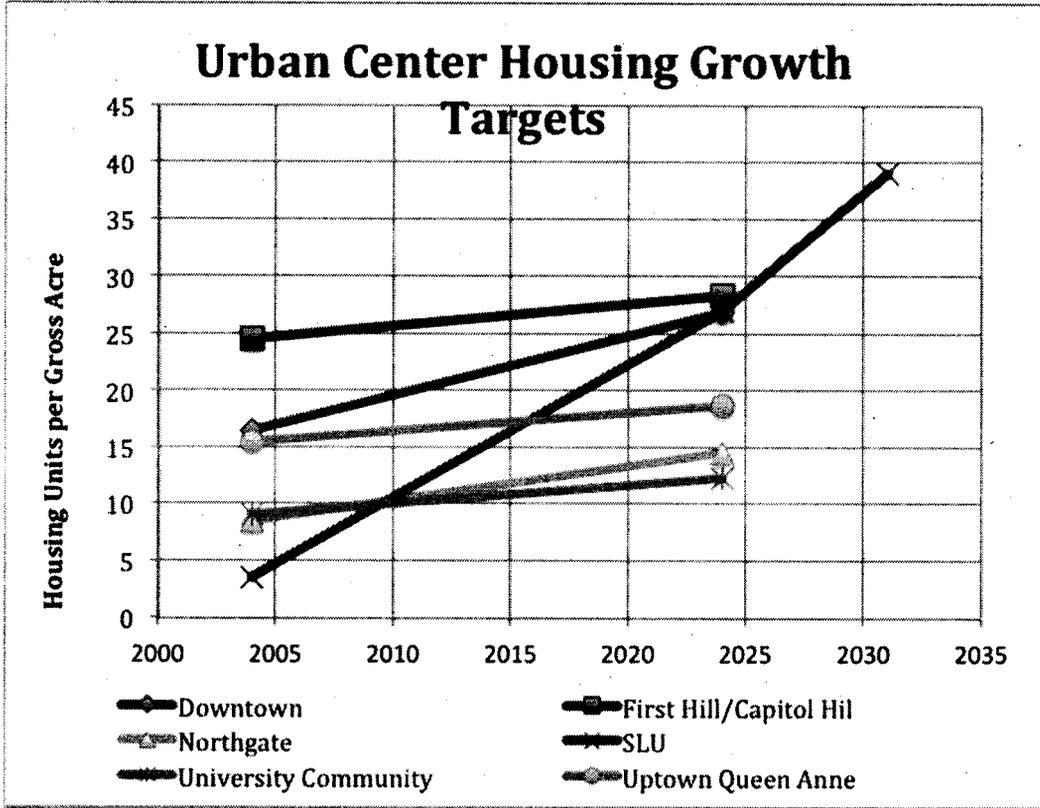
1. The impact of building wind wakes on aircraft landing and taking off should limit building heights to existing zoning.
2. Page 1-19 shadows on Lake Union Park should be highlighted for all four seasons, but particularly from September to March, critical months for light in Seattle. The mitigation for these damaging shadows should be to limit building heights between Valley and Mercer to eliminate them.
3. The impact of building wakes on sailboats all over Lake Union must be considered. Those impacts, because subtle changes can affect sailboats,

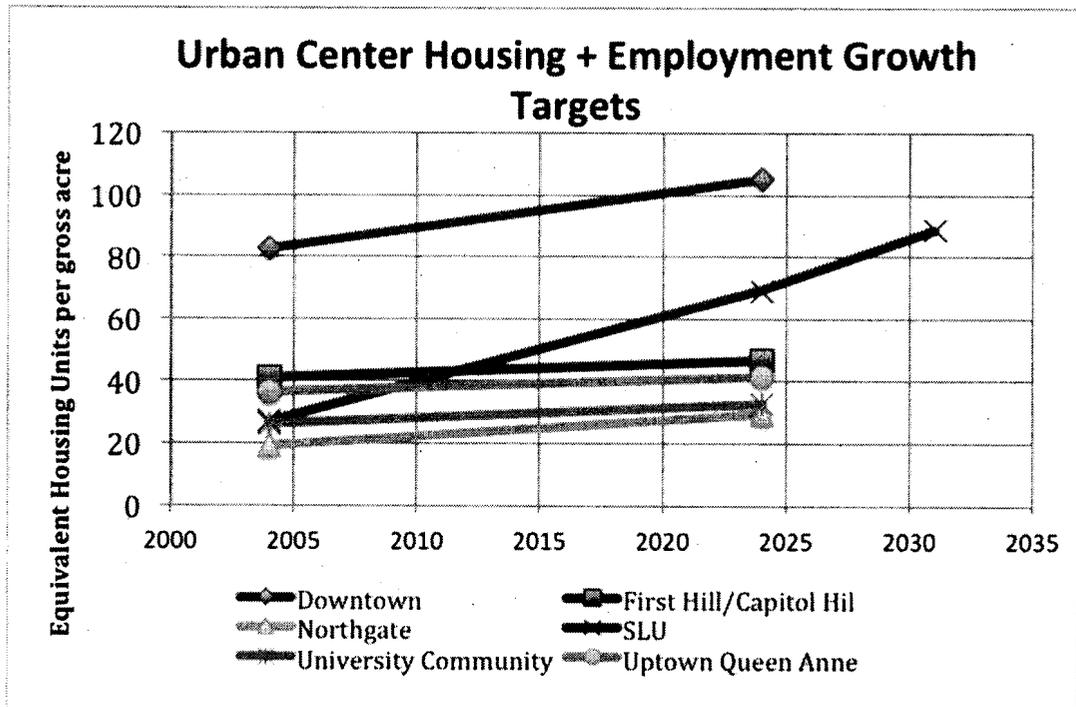
April 8, 2011  
Comments on SLU Rezone Draft EIS  
John Pehrson

- will be much more widespread. The logical mitigation is limiting building heights in this area to existing zoning.
4. All of the issues outlined above under Step Down call for limiting the heights in this area to existing limits.
  5. Page 1-28 should identify mitigation to account for the risk of the Liquefaction zone surrounding Lake Union. Should build mass be limited? Should certain kinds of construction be called for?
  6. Page 1-9 Geology and soil should state that in areas close to Lake Union, ground water will likely limit underground parking to one floor, so with a tower, much parking will have to be above ground which is damaging to the esthetics and pedestrian environment.
  7. The SLU growth targets in the Seattle Comprehensive Plan do not justify increasing the allowable building heights in this area from 60' to 160' to 300'.

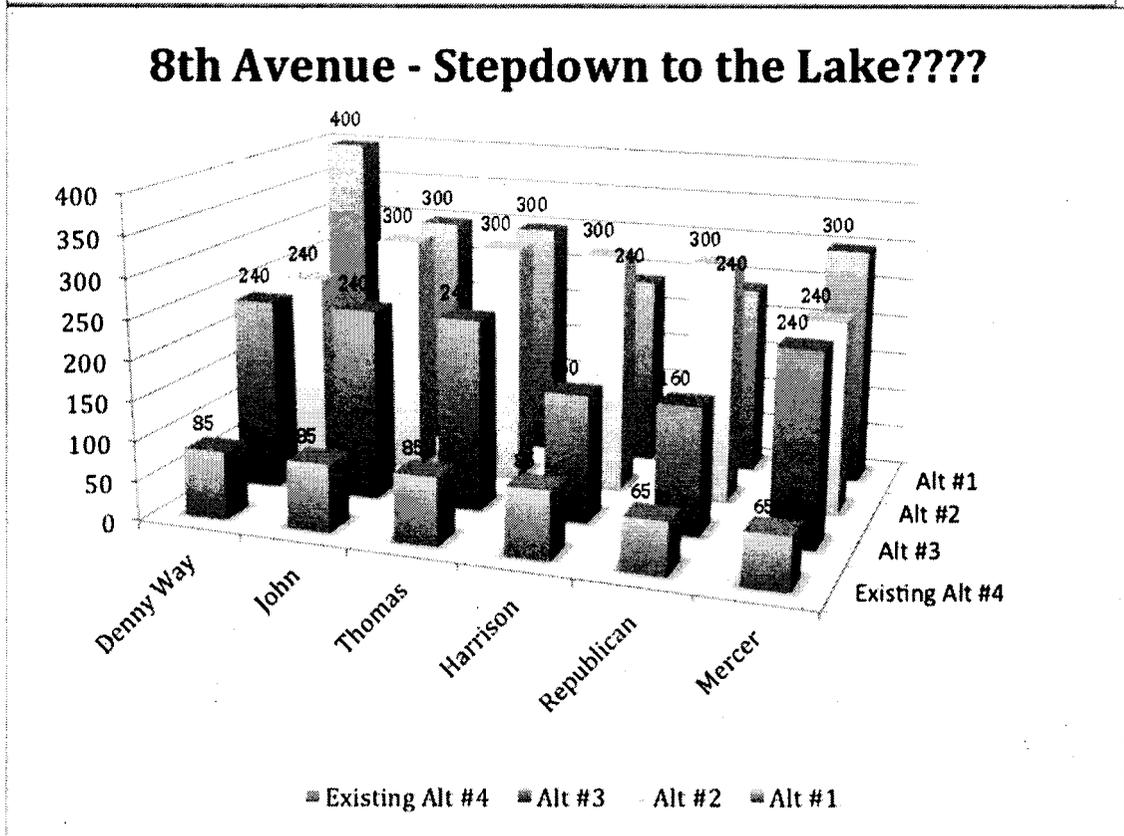
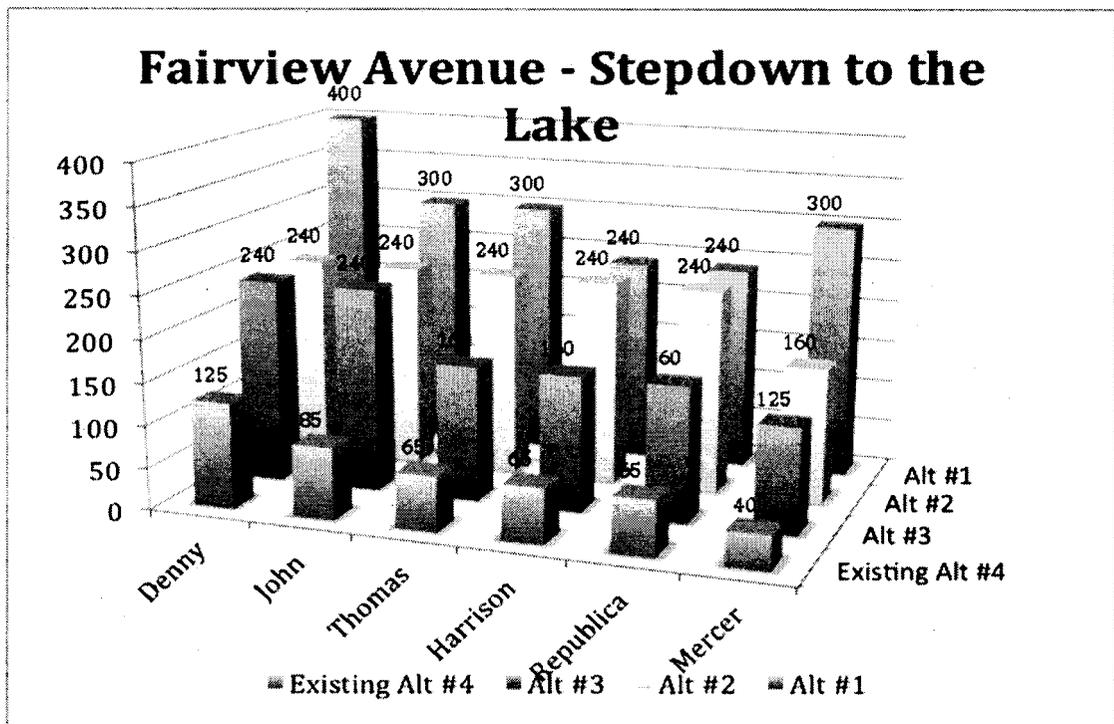
**L. Blocks West of Lake Union and Lake Union Park**

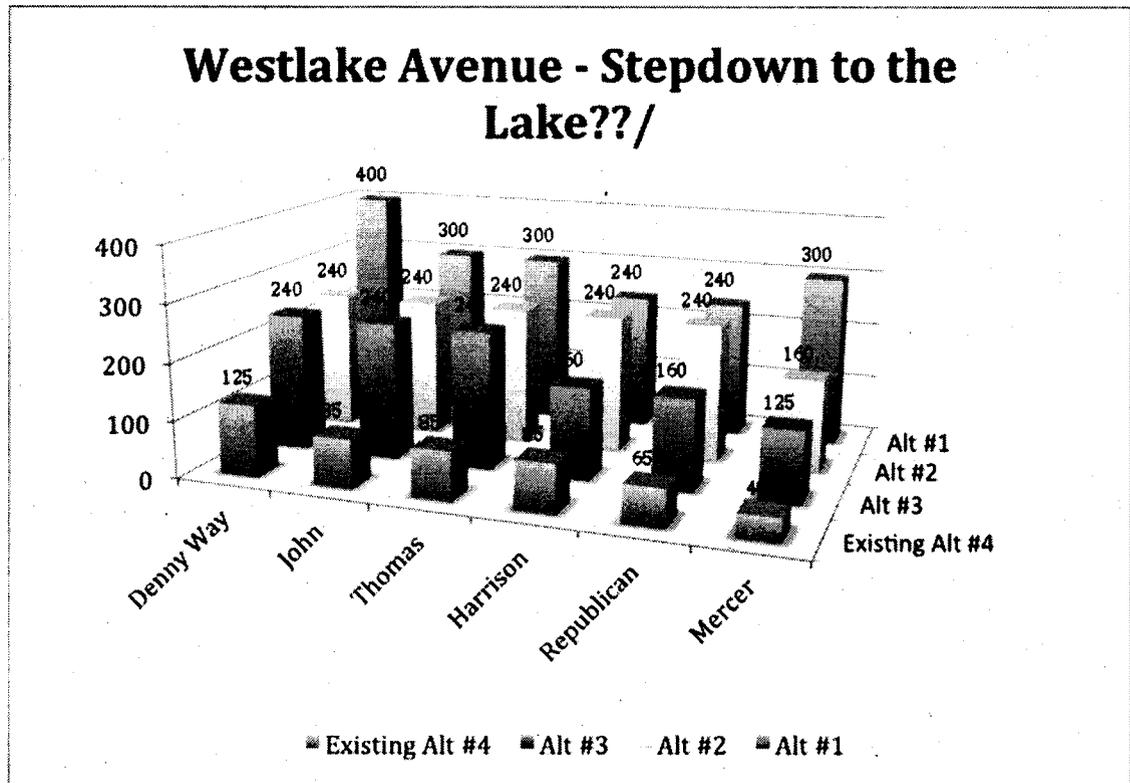
1. Steep slopes, slide areas, and the flight path should limit zoning on the west side of Lake Union Park/Lake Union from Mercer north to the current zoning of S/M 65.
2. The impact of building wind wakes on aircraft landing and taking off should limit building heights to existing zoning of 65'.
3. The impact of building wakes on sailboats all over Lake Union must be considered. Those impacts, because subtle changes can affect sailboats, will be much more widespread. The logical mitigation is limiting building heights in this area to 65'.
4. All the issues outlined above under Step Down call for limiting the heights in this area to existing limits.
5. Limiting zoning in this area to the current S/M 65 would not only recognize these hazards, but protect the existing views from the east side of Queen Anne toward Lake Union.





April 8, 2011  
 Comments on SLU Rezone Draft EIS  
 John Pehrson





**King, Donna**

---

**From:** Penn, Steve @ Seattle [Steve.Penn@cbre.com]  
**Sent:** Sunday, April 10, 2011 9:32 PM  
**To:** DPD\_Planning\_Division

To whom it may concern,

As a long time Seattle area resident and having spent over 20 years in the Seattle real estate industry, I am writing to offer my support for updating the South Lake Union Height and Density Draft EIS. 1

Since the SLU area was designated an Urban Center in 2004, actually close to a decade before that, the South Lake Union Area has evolved into Seattle's most vibrant place for residents, business and visitors to gather, to work and to live. By allowing for more people and taller buildings to continue in this "district", the city, its residents and business community will benefit from the following:

- Increased amenities, improvements to current transportation, efficient use of precious resources (energy and water to name two), and additional sustainable measures for all.
- Increased revenue through taxes, spending and investment.
- Focused and sensible growth in the SLU Area creates a "bookend" to the Financial District. This will result in growth and redevelopment in the area between these two districts. Again offering improved amenities, transportation solutions and sustainable features to residents, visitors and businesses.

Seattle is an innovative, engaging, educated and dynamic City. As a result, many of the nation's top corporations have chosen Seattle as their home as well as attracting strong interest from the investment community. To continue this positive momentum in the SLU District while improving the area for all, adopting the most aggressive alternatives is the right thing to do.

Thank you,

Steve

Stephen Penn | Managing Director  
CB Richard Ellis | Asset Services  
1420 5th Avenue, Suite 1700 | Seattle, WA 98101  
T 206 292 6065 | F 206 292 6033 | C 206 730 7507  
[steve.penn@cbre.com](mailto:steve.penn@cbre.com) | [www.cbre.com](http://www.cbre.com)



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Holmes, Jim

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**From:** Mark Petrie [mailto:mark.petrie@copiersnw.com]  
**Sent:** Tuesday, March 29, 2011 10:06 AM  
**To:** Holmes, Jim  
**Subject:** EIS for S Lake Union

Hi Jim,

I was at the public meeting last night but got there too late to have my name in for the public comment. I am in total support of option #1. 1

This is a great chance for the City of Seattle to get it right and not do it half way. Think of the growth this area will have in the next 50 years. Why not make it the most diverse, dense, safest area of the city. It would be great for many of my employees to work live and play right here in South Lake Union. We have over 200 employees and are growing. The City of Seattle is one of our customers with managed HP printers.

This is a great chance to reduce carbon footprint and help save fossil fuels from being burned. We have replaced all our old lighting here with new LED and HO florescent lighting in our building here that we have occupied since 1989, and owned since 1997.

I would also urge the DPD to look at the positive economic impacts that option #1 will provide and not just look at the negative that is in the EIS.

Please do not do this opportunity half way. Let's have the City maximize this rare opportunity for smart contained growth for the good of all its citizens.

Than you,

Mark Petrie  
CEO

206-282-1200 - Office  
206-286-5508 - Direct  
206-658-2808 - Fax

[www.copiersnw.com](http://www.copiersnw.com)



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**King, Donna**

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**From:** popec@rockisland.com  
**Sent:** Saturday, April 09, 2011 2:08 PM  
**To:** DPD\_Planning\_Division  
**Subject:** South Lake Union EIS

Dear DPD,

As a 79 year old resident of the South Lake Union neighborhood, I would like to comment on the EIS. The need for growth in our area is recognized and the need for tall buildings is obvious in order to increase the number of future inhabitants. What upsets me, even though I will probably not be alive when it happens, is the plan to put high rises immediately around Lake Union. What ever happened to step-down planning? Alternative 3 is the least harmful, but they all have this defect. High rises-yes. Around the lake-NO.

1

Charles E. Pope II, MD  
116 Fairview Avenue North #512  
Seattle, WA 98109

King, Donna

---

**From:** Bill Potter [williamwpotter@gmail.com]  
**Sent:** Sunday, April 10, 2011 2:16 PM  
**To:** DPD\_Planning\_Division  
**Subject:** Draft EIS Statement, comments

"Hello,

I am a current resident of Mirabella and a member of LUOA. I don't think South Lake Union knows what it wants to be since the area was designated a City Urban Area. The proposed EIS Statement Alternatives #1 and 2 will take away the chance to be anything other than an extension of downtown. The thought of "Towers" 300 to 400 feet in areas that now only have a maximum height of 125 feet would seem to me to be increasing the density to downtown areas with its resultant crowding and parking problems.

1

One of the desirable features of the current height regulations is the reduction in the allowed height as the blocks approach the Lake, resulting in a better view of the main feature of the area: Lake Union.

2

I believe that, due to the current financial and employment conditions, there is no need to rush into such a drastic realignment of the building conditions. If we settle back and see what becomes of the "Mercer Mass" reconstruction, we will have a better idea of what the area can tolerate when conditions improve.

3

I believe the best current resolution is a compromise between Alternatives 3 and 4, with a reduction in the height as the distance to the Lake decreases. I particularly deplore the disregard of the existing regulations in the case of Amazon and the UW Research Center. What's the use of having regulations if they can be breached by a simple vote of the City Council? However, admittedly, it will take some effort for this area to devise a plan as to what it wants to be, without having draconian building heights imposed on it. Further, I believe LUOA has a role in this planning effort.

4

Sincerely,

Potter #926  
254-9108

William W  
(206)

Holmes, Jim

From:
Sent: Wednesday, March 16, 2011 8:27 PM
To: DPD\_Planning\_Division
Cc: jeff.rabe@ottorosenau.com
Subject: South Lake Union EIS

If the continued re-development of the South Lake Union area is dependant upon zoning changes that allow greater height and density in that neighborhood then I am all for it. I believe the proposed changes will bring additional development which is not only an economic boon to the city in forms of new jobs and taxes, but will also encourage people to live closer to work and reduce congestion and commuting into and out of the city.

There is also another issue I am very concerned about: Public Safety. Currently the area between Aurora and I-5 in the SLU neighborhood seems to be a haven for prostitution and drug related activity. I have frequent business trips to some of the new buildings that have recently been constructed. My hours vary but are frequently quite early in the morning and sometime after dark in the late evenings. I don't think it is safe to walk even a few blocks through much of this area until I get close to where the newer buildings have been constructed. The whole atmosphere tends to change there and I see normal working people instead of pimps and prostitutes and other undesirables that are heavily present only a few blocks away, especially near Denny Park.

I don't see any down side to having high rise buildings full of normal working people in that area. There is a big downside in letting the area continue to decay.

Sincerely,

Jeff Rabe
206 700 5670

1
2

Holmes, Jim

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**From:** Jamie Randall  
**Sent:** Thursday, April 07, 2011 8:20 AM  
**To:** DPD\_Planning\_Division  
**Subject:** EIS

To whom it may concern,

I am writing to express my concern about a proposal to build 300-400 ft. tall buildings in the South Lake Union Area. As a resident of SLU some of my favorite things about the area are the neighborhood feel, the views of the lake and the mountains, and the sunlight that comes streaming in my window to wake me in the morning. I know this is just another project for developers but for me it is so much more; it will affect my every day quality of life. I strongly oppose any plan to build towers in the area and encourage you to pursue EIS plan number three instead, which offers a more sensible approach to growth and density. I believe this compromise can make everyone happy and I sincerely hope you will consider it above all others as you move forward with this project. | 1

Sincerely,

Jamie Randall

Table 4-2

Responses to Public Comments Received During the Comment Period

Comment Number	Response
<b>Letter 125: Link, Kristen</b>	
1	<b>Support Alternative 3.</b> The comments are noted.
<b>Letter 126: Littlel, John</b>	
1	<b>Support Greater Intensity of Jobs and Housing.</b> The comments are noted.
<b>Letter 127: Loacker, John</b>	
1	<b>Support Alternatives 1 and 2.</b> The comments are noted.
<b>Letter 128: Lust, Todd</b>	
1	<b>Support Alternative 1.</b> The comments are noted.
<b>Letter 129: Malaspino, Joe</b>	
1	<b>Support Additional Height and Density.</b> The comments are noted.
<b>Letter 130: Markley, David D.</b>	
1	<b>Study Area.</b> The commenter requests that the study area of the analysis be expanded. In response, the project team performed a second look at the distribution of the trips expected from the proposed height and density increase and determined that the study area defined in the EIS is adequate.
2	<b>Recalibration of Travel Model.</b> The City's official calibrated and validated travel demand model was used in the analysis. A recalibration of the travel model is not appropriate given that Denny Way and Mercer Street serve different destinations. Mercer Street provides access to I-5 and Denny Way provides access to Capitol Hill and First Hill, so they do not act as equivalent travel paths to many travelers.
3	<b>Intersection Analysis.</b> At the outset of this project, we elected to analyze corridors to capture impacts and propose mitigation on a larger scale. We feel this technique is appropriate given that intersection analysis may focus too narrowly on intersection impacts and mitigations.
4	<b>Existing Mode Split.</b> The purpose of the Draft EIS is to compare the No Action and Action Alternatives. The existing mode split is not relevant to this analysis.
5	<b>Mitigation's Effect on Mode Split.</b> The effectiveness of the mitigation measures suggested in the Draft EIS are based on a study commissioned by the California Air Pollution Control Officers Association (CAPCOA) which performed a meta-analysis of other studies around the country. These multiple academic studies provide reasonable assumptions for the South Lake Union

Comment Number	Response
	neighborhood.
6	<b>Citywide Development.</b> The commenter raises an issue related to concurrency. The City is beginning an update to the Comprehensive Plan and will address this issue as part of that process.
<b>Letter 131: Masson, Chris</b>	
1	<b>Graphics.</b> Please see Final EIS Section 3.4 for views of the neighborhood in the context of the surrounding area from Gas Works Park and a birds-eye view over Lake Union. In this same section, please see the street-level views which show the potential building height and mass in the context of existing structures.
2	<b>No Change in Heights.</b> The comments are noted.
<b>Letter 132: Masson, Diane</b>	
1	<b>No Increased Height on East Side of Fairview.</b> The comment is noted.
2	<b>Low Heights North of Mercer.</b> The comment is noted.
3	<b>Keep Cascade Neighborhood Intact.</b> The comment is noted.
4	<b>Not Like Downtown.</b> The comment is noted.
<b>Letter 133: Matthews, Carrie</b>	
1	<b>Support Height and Density.</b> The comments are noted.
<b>Letter 134: Matthews, Tim</b>	
1	<b>Support Increased Height and Density.</b> The comments are noted.
<b>Letter 135: McKay, JJ</b>	
1	<b>Support Increased Density Plan.</b> The comments are noted.
<b>Letter 136: McLaughlin, Jan</b>	
1	<b>Support Alternative 1.</b> The comments are noted.
<b>Letter 137: Miller, Terry</b>	
1	<b>Support Alternative 1.</b> The comments are noted.
<b>Letter 138: Moss, Christine</b>	
1	<b>2031 Growth Estimate.</b> As described in Draft EIS Section 2.2, the 2031 estimates are intended to provide additional context for understanding potential long-term growth in South Lake Union. As noted in the discussion in this section, the estimate is for analysis purposes only and does not represent policy intent by the City. In order to disclose the potential range of capacity

Comment Number	Response
	needed to meet a future growth target for South Lake Union, both 2024 and 2031 are considered in the analysis.
2	<b>Building Heights.</b> The comments are noted. Please see Final EIS Chapter 2 for an illustration of proposed maximum building heights under each alternative.
3	<b>Support Cascade Neighborhood Existing Zoning to Fairview.</b> The comment is noted.
4	<b>Neighborhood Facilities.</b> As described in Final EIS Chapter 2, a fundamental objective of the proposal considered in the EIS is to use incentive zoning to achieve public benefits, including those listed in the comment. Please see Draft EIS Section 3.16 for a discussion of open space and recreation facilities and Final EIS Section 3.5 for a discussion of schools.
5	<b>Transportation Analysis.</b> The comment is noted. Please see Draft EIS Section 3.13 for the transportation analysis of each alternative.
<b>Letter 139: Mulica, Thomas</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
<b>Letter 140: Munger, Jeffrey</b>	
1	<b>Support Greater Height and Density.</b> The comments are noted.
<b>Letter 141: Muratore, Michael</b>	
1	<b>Support Additional Growth.</b> The comments are noted.
<b>Letter 142: Naprawrich, MaryAnn</b>	
1	<b>Not Like Downtown.</b> The comments are noted.
<b>Letter 143: Norton, Ruthe and Frank</b>	
1	<b>Alternative 3 Most Acceptable.</b> The comments are noted.
<b>Letter 144: Novy, Richard</b>	
1	<b>Beauty of Area.</b> The comments are noted.
<b>Letter 145: Nottingham, Sarah Rose</b>	
1	<b>Support Growth.</b> The comments are noted.
<b>Letter 146: O'Brien, Kathleen</b>	
1	<b>Density is Key.</b> The comments are noted.
<b>Letter 147: Ostergaard, Paul B</b>	
1	<b>Podiums.</b> The comments are noted.

Comment Number	Response
2	<b>Form-based Approach.</b> The comments are noted.
3	<b>Feasibility and Character.</b> The comments are noted.
<b>Letter 148: Parente, Kini</b>	
1	<b>Encourage Height and Density.</b> The comments are noted.
<b>Letter 149: Parrish, Brad</b>	
1	<b>Support Height and Density.</b> The comments are noted.
<b>Letter 150: Parsons, Craig</b>	
1	<b>Support Increased Density.</b> The comment is noted.
2	<b>Public Schools.</b> Please see Final EIS Section 3.5 for a discussion of school impacts.
3	<b>Power Infrastructure.</b> Pending input from SCL
4	<b>Not Supporting Streetcar System.</b> The comment is noted.
<b>Letter 151: Pavlovec, Brian and Giselle</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
<b>Letter 152: Pearson, William</b>	
1	<b>Building Heights.</b> The comments are noted.
<b>Letter 153: Pehrson, John</b>	
1	<b>Integration of Environmental Elements.</b> The comment is noted. For the balance of this letter, please see responses to Comments 24 through 53 in Letter 13.
<b>Letter 154: Penn, Steve</b>	
1	<b>Support Height and Density.</b> The comments are noted.
<b>Letter 155: Petrie, Mark</b>	
1	<b>Support Alternative 1.</b> The comments are noted.
<b>Letter 156: Pope, Charles E.</b>	
1.	<b>Height Near Lake Union.</b> The comments are noted.
<b>Letter 157: Potter, William W.</b>	
1	<b>Extension of Downtown.</b> The comment is noted.

Comment Number	Response
2	<b>Lake Union View.</b> The comment is noted.
3	<b>Wait for Mercer Reconstruction.</b> The comment is noted.
4	<b>Compromise Between Alternatives 3 and 4.</b> The comments are noted.
<b>Letter 158: Rabe, Jeff</b>	
1	<b>Support Greater Height and Density.</b> The comment is noted.
2	<b>Public Safety.</b> The comment is noted.
<b>Letter 159: Randall, Jaime</b>	
1	<b>Support Alternative 3.</b> The comment is noted.

## Comment Letters 160-194

<b>160.</b>	Redman, Scott
<b>161.</b>	Reel, Richard
<b>162.</b>	Reel, Richard
<b>163.</b>	Reel, Richard
<b>164.</b>	Rivera, Chris E.
<b>165.</b>	Roewe, Matthew H.
<b>166.</b>	Rusch, Scott
<b>167.</b>	Russell, Eric
<b>168.</b>	Sather, Katherine
<b>169.</b>	Saucier, Lyn
<b>170.</b>	Schauer, Tom
<b>171.</b>	Sevart, Ron
<b>172.</b>	Sharp, Jeff
<b>173.</b>	Shushan, Stephanie
<b>174.</b>	Simonetti, Martin
<b>175.</b>	Sleicher, Charles
<b>176.</b>	Smith, Patricia
<b>177.</b>	Smithhart, Noelle
<b>178.</b>	Snorks, Paul
<b>179.</b>	Starr, Scott
<b>180.</b>	Stepherson, Josh
<b>181.</b>	Stoner, Mark
<b>182.</b>	Sullivan, David
<b>183.</b>	Surdyke, Scott
<b>184.</b>	Suver, Joanne
<b>185.</b>	Symonds, Drew
<b>186.</b>	Tangen, John
<b>187.</b>	Thordarson, Michelle
<b>188.</b>	Timpson, E. Diana
<b>189.</b>	Trainer, Steve
<b>190.</b>	Tung, Beatrice
<b>191.</b>	Turner, John
<b>192.</b>	Tweedale, Kelly
<b>193.</b>	Twill, Jason
<b>194.</b>	Umali, Tino

Holmes, Jim

From: Scott Redman [Scott.Redman@sellen.com]  
Sent: Monday, April 11, 2011 3:47 PM  
To: DPD\_Planning\_Division  
Subject: South Lake Union Height & Density Draft Environmental Impact Statement

Importance: High

Mr. James Holmes  
Seattle Department of Planning and Development  
700 Fifth Avenue, Suite 1900  
PO Box 34019  
Seattle, WA 98124-4019  
[southlakeunionels@seattle.gov](mailto:southlakeunionels@seattle.gov)

RE: South Lake Union Height & Density Draft Environmental Impact Statement

Dear Mr. Holmes:

Sellen Construction is a privately held company located in the South Lake Union area of Seattle. Our business has been located in this neighborhood since our founding in the early 1940's. We've seen a lot of changes in the neighborhood since our early days-from the early industrial warehouses to the now bustling information technology, biotechnology, corporate and non-profit organizations that we call neighbors. Almost weekly, we're welcoming new businesses to the area; residents are moving-in; pedestrians are taking to the streets to walk to cafes, restaurants, and grocery stores; and construction trucks are rolling along constructing new buildings for Amazon.com, MOHAI, and University of Washington's School of Medicine. It's an exciting time to work and live in South Lake Union!

I understand that height and density limits for South Lake Union are under review and I wanted to take a moment to tell you why Sellen and I support height and density revisions to our neighborhood:

- We need more housing and more people in our neighborhood. More people living in the area means more activity on the street afterhours, safer neighborhoods, more amenities, and better success for businesses.
- Sellen is committed to living and working sustainably and increasing the density of our urban neighborhoods will allow our employees to live closer to work, reducing our environmental footprint. The more housing and amenities we add to our urban neighborhoods, the more options we'll be able to provide for those who work here. A shorter commute can dramatically reduce everyday costs and leave more time for family and community.
- As a former board member for the Seattle Parks Foundation, I understand the importance of building and advocating for green space, but it is a shame that we don't have more people living and working near parks like the new South Lake Union Park. We've made an effort to build amenities to attract people to our urban centers, but now we need to allow for infrastructure to welcome more residents to our neighborhoods that can use them.

Thank you for the excellent work you are doing to make Seattle a livable, workable city for us and future generations. Please approve increased heights and higher density for South Lake Union-it benefits the most people and maximizes our city resources. It's the right thing to do.

Sincerely,

Scott Redman



Scott Redman  
President

**Sellen Construction Company**

w. [www.sellen.com](http://www.sellen.com)

t. 206.805.7133

c. 206.321.7133

f. 206.805.7233

e. [scott.redman@sellen.com](mailto:scott.redman@sellen.com)

**Holmes, Jim**

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**From:** rhreel@aol.com  
**Sent:** Tuesday, March 29, 2011 9:54 AM  
**To:** DPD\_Planning\_Division  
**Subject:** Draft EIS for South Lake Union

My name is Richard Reel. I have been a small business and property owner in the South Lake Union (SLU) neighborhood since 1984. I have seen many changes, mostly positive. Now we have, as a city, a chance to make more improvements to the neighborhood that will greatly benefit the entire city.

I support the A-1 Alternative in the draft environmental impact statement.

I also support allowing greater commercial height and density in the 8th Avenue and 9th Avenue corridor.

South Lake Union has been designated an Urban Center since 2004. It is part of the Comp Plan. In all the city, it is a logical area for the coming growth to Seattle.

The plan to Upzone the area will mean more efficient use of our downtown land. This will require greater density and height. This will result in less, future sprawl in Seattle.

The SLU area already has the paid for infrastructure, including transportation. You can walk to the downtown core.

The plan will provide for much more Affordable Housing.

It will also encourage more BioTech and HighTect companies to locate in Seattle. This means jobs and tax revenues.

The plan to create more height and density in this neighborhood has been studied and advocated for by many people and leaders in Seattle. It make tremendous sense on all levels.

So if not in South Lake Union .....WHERE?

I urge your support. Rich Reel

1

Holmes, Jim

---

**From:** rhreel@  
**Sent:** Wednesday, April 06, 2011 10:33 AM  
**To:** DPD\_Planning\_Division  
**Subject:** Draft EIS Comments

I am writing to give you a couple of comments on the draft EIS for South Lake Union. They are:

- 1) The Final EIS should very explicitly mention that the current zoning remains as an option, should you choose not to take advantage of the incentive zoning. | 1
- 2) The view analysis in section 3.10 is flawed in that the alternatives are compared to existing conditions. The alternatives should be compared against the full build out under existing zoning. | 2

Thanks, Richard Reel, Property owner South Lake Union

**From:** [RHREEL@aol.com](mailto:RHREEL@aol.com) [mailto:RHREEL@aol.com]

**Sent:** Monday, April 11, 2011 11:37 AM

**To:** Holmes, Jim; DPD\_Planning\_Division

**Subject:** Draft EIS Comments

Attached is an Environmental Benefits Statement (EBS). Its purpose is to articulate the wide range of benefits that can result from responsible urban development. More specifically, its goal is to supplement the information that is furnished by the Environmental Impact Statement (EIS), and bring breadth and balance to the public debate. It attempts to inform the conversation by holistically focusing on the potential benefits to the community and environment, providing appropriate attention to all there is to be gained—at the neighborhood, city, and regional levels.

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This Environmental Benefits Statement was funded by: Equity Office, Fred Hutchinson Cancer Research Center, The Kenney Family, PEMCO, Rich Reel, The Seattle Times Company, Touchstone Corporation, and Vulcan Inc.

With Participation from other SLU Property Owners Group Members: The Blume Company, John Goodfellow, The Justen Company, The Lowen Family, Sellen Construction, and Walsh Construction.

Thanks for your efforts to make Seattle an even greater city.

Richard Reel



# ENVIRONMENTAL BENEFITS STATEMENT

South Lake Union Urban Center  
Seattle, Washington

Prepared by GGLO  
March 2011



**From:** [RHREEL@aol.com](mailto:RHREEL@aol.com) [mailto:RHREEL@aol.com]

**Sent:** Monday, April 11, 2011 11:37 AM

**To:** Holmes, Jim; DPD\_Planning\_Division

**Subject:** Draft EIS Comments

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Thanks for your efforts to make Seattle an even greater city.

Richard Reel

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**Sent:** Monday, April 11, 2011 11:37 AM

**To:** Holmes, Jim; DPD\_Planning\_Division

**Subject:** Draft EIS Comments

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Thanks for your efforts to make Seattle an even greater city.

Richard Reel

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### What is an Environmental Benefits Statement?

The purpose of an Environmental Benefits Statement (EBS) is to articulate the wide range of benefits that can result from responsible urban development.

More specifically, a key goal of an EBS is to supplement the information that is furnished by a typical Environmental Impact Statement (EIS), and bring breadth and balance to the public debate.

Development is inherently controversial, simply because it entails change. Unfortunately, that built-in controversy has a tendency to obscure the potential benefits. Significant land use actions typically require an EIS, a document that frames the debate in terms of the potential negative impacts, often aggravating the unconstructive dynamic of contention.

An EBS, in contrast, attempts to inform the argument by holistically focusing on the potential benefits to the community and environment, providing appropriate attention to all there is to be gained—at the neighborhood, city, and regional levels.

## SUMMARY

This Environmental Benefits Statement is a discussion of the potential benefits of height and density increases in the South Lake Union (SLU) neighborhood. The City of Seattle has been exploring options for updates to SLU's zoning since 2008, and in February 2011 published a draft environment impact statement (DEIS) that analyzes four alternatives. The purpose of this document is to explore positive impacts that are beyond the scope of the DEIS, and to inform and enhance the debate concerning these vital policy decisions. The key points are summarized below:

- **The core benefit of new development in SLU is the creation of housing and jobs.**
- **Between 2005 and 2025 a cumulative tax revenue of \$1.3 billion could be generated by development in SLU.**
- **SLU represents one of Seattle's best opportunities for accommodating growth while minimizing demand on roadways.**
- **Taller buildings provide superior options for a high-quality built environment and public realm.**
- **The redevelopment of SLU will benefit the neighborhood, the city, and the region.**
- **SLU presents an unmatched opportunity to create an urban center that fosters low-carbon lifestyles.**
- **New development in SLU can reduce regional energy demand and reduce stormwater runoff pollution.**

The prospects for achieving each of the above benefits will be determined by the amount of new development that occurs. Maximizing the chances for that outcome calls for zoning that allows the greatest development capacity and flexibility. Of the alternatives studied in the DEIS, Alternative 1 provides the greatest heights and densities, and therefore is the best choice for providing the most benefits to the local community, the City of Seattle, and the greater region.

## THE SOUTH LAKE UNION URBAN CENTER



### The South Lake Union Neighborhood Plan envisions an urban center that will:

- balance housing and job growth, providing a live/work neighborhood;
- provide a model for sustainable redevelopment and infrastructure;
- respect the neighborhood's marine and industrial past, but welcome change;
- be easy to get around on foot, bike, boat, transit and car;
- attract innovative industries and organizations; and
- be safe and attractive to a diverse range of families and households.



Hemrich Brothers' Brewing Company, c.1900, once located on Yale Ave N between Republican and Mercer Streets.

The South Lake Union (SLU) neighborhood comprises 340 acres bounded by Interstate 5 to the east, Denny Way to the south, Aurora Avenue to the west and the Lake Union shoreline to the north (up to Galer and Ward Streets). In 2004, SLU was designated an “urban center,” and in 2007 the City adopted the South Lake Union Urban Center Neighborhood Plan, which articulated the vision summarized in the sidebar to the left.

**SLU—one of Seattle’s oldest neighborhoods—has long been characterized by its dynamic range of uses.** It is the site of Seattle’s first public school, and is still home to the St. Spiridon and Immanuel Lutheran churches, both established in the 1890s. Through the early 20th century the neighborhood was made up of a mix of housing and industry, including a Ford Model T factory and Boeing’s first facility. The neighborhood went into decline in the post-WWII years, and through the 1960s and 1970s was considered “blighted.”

Recovery began in the 1980s as the prime location began to attract new uses, and in recent decades the neighborhood has undergone significant redevelopment. Over the the last six years alone, South Lake Union has seen \$3.0 billion in public and private investment, and has become an established biotech center, as well as home to thousands of new residents.

### What’s next for SLU?

**SLU’s growing importance as a job center, together with its central location adjacent to downtown Seattle, presents one of the City’s best opportunities for high-intensity, mixed-use redevelopment.** Recognizing this potential, in 2008 the City proposed increases in allowed building height and density, and in parallel crafted an Urban Design Framework, which states:

*“South Lake Union has the potential to demonstrate smart growth at its best – a livable, vibrant urban neighborhood that builds on its history and physical setting, continues to grow an innovative local economy, supports a mix of residents of all ages and incomes, and provides rich cultural opportunities.”*

The proposed increase in height and density required review under the State Environmental Protection Act, and the Draft Environmental Impact Statement (DEIS) that analyzes four alternatives was released for public comment in February 2011. The final EIS will be published Summer 2011.

The heights and densities studied begin with Alternative 1 as the highest, followed in order by Alternatives 2 and 3. Alternative 4 studies the existing zoning. Maximum heights for residential towers in certain zones are 400, 300, and 240 feet for Alternatives 1, 2, and 3, respectively. For heights above 85 feet, all three alternatives would require participation in an incentive zoning program that would grant additional height in exchange for public amenities provided by the developer.

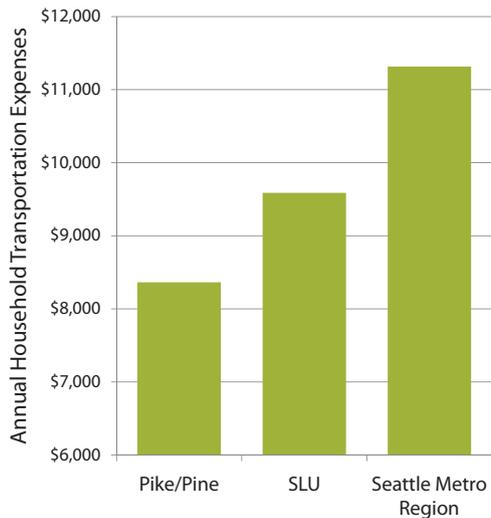
## HOUSING AND JOBS

**The core benefit of redevelopment in SLU is the creation of new housing and jobs.** In 2004, Seattle set growth targets of 16,000 new jobs and 8,000 new households in SLU by 2024. King County recently issued 2031 growth targets which, if allocated proportionally to SLU, translate to 21,900 new jobs and 11,900 new households.<sup>1</sup> Accommodating this growth will depend on zoning that allows capacity for much more than those targets, because not all properties will be redeveloped by 2031 due to a host of economic and ownership factors. Furthermore, the region will not stop growing in 2031, and rezones should reflect the fact that these are 50 to 100-year decisions.

DEIS Alternative	Capacity	
	Households	Jobs
1	21,000	31,500
2	19,000	30,500
3	15,000	23,000
4 (no action)	11,500	20,000



The Denny Park Apartments in SLU, completed in 2005, provide 50 units affordable to households earning 30, 50 and 60 percent of area median income. Photo: Dan Bertolet



The chart above shows household transportation costs as estimated by the Center for Neighborhood Technology. Today, the Pike/Pine neighborhood has the lowest costs because it has the most complete set of characteristics that enable less driving. Future development in SLU has the potential to match or surpass those savings. Source: <http://htaindex.cnt.org>.

### Housing

Between 2000 and 2010, the number of permanent housing units in SLU grew from 849 to 2,980. In a 2003 report authored by economist Paul Sommers,<sup>2</sup> housing units were forecasted to grow by more than 10,000 between 2000 and 2020. For comparison, estimated housing unit capacities given in the DEIS are shown in the adjacent chart. **Alternative 1 has capacity for 6,000 additional residential units compared to Alternative 3, and provides greatest potential to achieve the growth targets under real world conditions.**

### Affordable Housing

As is typical for growing cities, lack of affordable housing is a vexing problem in Seattle. According to the DEIS, as of 2007 SLU had more than 400 City-funded affordable housing units, equivalent to 13 percent of total housing units. (More recent data collected by private property owners reflects a total of 527 subsidized units out of a total of 2,980 units, or 18 percent City-funded affordable units.) For all three alternatives, assuming the City's current incentive zoning system is expanded to SLU, any development above 85 feet would require either on-site affordable housing, or a contribution to fund low-income housing somewhere within SLU. According to the DEIS, **Alternative 1 would create the greatest potential benefit for affordable housing in the neighborhood.**

### The Car-Free Advantage

The American Public Transit Association estimates that the average annual cost of owning a car in Seattle is \$11,185. **In urban neighborhoods like SLU, car-free living can be a viable option for residents, a choice that can significantly reduce household expenses.** Studies have shown that on average, U.S. households in auto-dependent suburban neighborhoods spend 24 percent of their income on transportation, while those in walkable, transit-rich neighborhoods spend 12 percent.

1. DEIS

2. Potential Economic and Fiscal Impacts of South Lake Union Redevelopment, Paul Sommers, for City of Seattle Office of Policy and Management, July 2004



Completed in 2010, this mixed-use office building located on Boren Ave N between Mercer and Republican Streets provides 158,000 square feet of office for Amazon.com, along with 14,000 square feet of street level retail.



Small, pedestrian-oriented businesses are an important ingredient of a vibrant neighborhood, and the Yellow Dot Cafe in SLU is an example of how such businesses are supported by new residential development.



Alley 24, a full-block mid-rise development located adjacent to REI in SLU, is one of the City's best examples of true mixed-use development, providing office, retail, and rental housing, with 20 percent of units affordable to households earning less than 60 percent of area median income. Photo: Dan Bertolotto

## Jobs

Employment in SLU has been rapidly evolving over the last decade. Our region's growth industries—technology, biotechnology, and global health—are creating a knowledge hub in SLU, which is becoming a magnet for new businesses. Since 2004, 4.4 million square feet of new commercial space has been completed in SLU. Newly constructed offices in the neighborhood are bringing more than 9,000 additional jobs between 2010 and 2013 (though some of these are not new jobs for the City). Recent headlines report that Amazon will be hiring an additional 1,900 positions.

Each alternative has capacity to meet the estimated minimum job growth target of 21,900 new jobs in SLU by 2031. However, the Sommers report (cited previously) projected much higher job growth, with the potential for more than 22,000 new jobs as early as 2020, and actual job growth exceeded Sommers' 2010 high-end projection by 29 percent.<sup>3</sup> Therefore, **if it is deemed important that job growth in SLU not be hamstrung by land-use regulation, then DEIS Alternative 1 is the best option.**

## Small, Independent Businesses

Small, independent businesses are an important ingredient of vibrant, equitable neighborhoods. More people living and working in SLU will lead to increased foot traffic—the lifeblood of small, independent businesses—and will create demand for the everyday products and these businesses provide. Reflecting this potential, the Sommers report projected that **new development in SLU could result in the creation of nearly 7,000 new retail jobs by 2020.**

## Jobs-Housing Balance

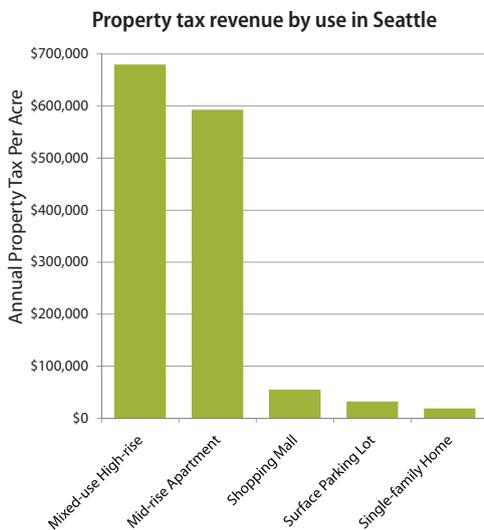
When jobs and housing are geographically separated, more people end up traveling long distances to get to work, a trend that has a host of well-known negative impacts. **Redevelopment in SLU has the potential to create a healthier jobs-housing balance at both the city and regional scales.**

Locally, new housing created in SLU will provide the opportunity for residents to live “next door” to jobs in SLU, and in very close proximity to the region's largest job center in downtown Seattle. New jobs created in SLU will offer more opportunities for short, car-free commutes from Seattle's residential neighborhoods. From the regional perspective, job growth in SLU will help reverse the decades-old trend of employment centers moving to the suburbs. The region's clogged freeways are a testimonial to the extended commutes caused by the segregation of jobs and housing. The potential for ameliorating the jobs-housing imbalance would be maximized by zoning that allows for the highest capacity of both housing *and* jobs in SLU.

3. DRAFT Update to Potential Economic and Fiscal Impact of South Lake Union Development, Paul Sommers and Mike Mann, 2011



The City of Seattle and SLU property owners invested \$52 million in the Seattle Streetcar, which began operation in 2008 and has achieved ridership levels 40 percent higher than the initial forecast. Photo: Dan Bertolet



Source: Downtown Seattle Association



Lake Union Park, rendered above, is a \$30 million public investment that provides open space for a growing South Lake Union neighborhood.

## ECONOMICS

New development in SLU has the potential to provide significant economic benefits in many different ways. The extent of each benefit is proportional to the intensity of redevelopment, a dynamic that favors the adoption of Alternative 1, since it allows for the greatest capacity and flexibility.

### Jobs

As noted in the previous section, redevelopment in SLU will create new jobs—as many as 17,000 between 2008 and 2020 (see page 5). The creation of jobs in SLU will also stimulate the creation of additional jobs throughout the region. The Sommers report estimates that between 2008 and 2020 **indirect economic impacts from job growth in SLU could result in approximately 39,000 new jobs statewide**, of which 58 to 70 percent would be in Seattle. Redevelopment in SLU will also create construction jobs. Between 2004 and 2010, real estate development alone generated 996 annual construction jobs, 46 percent more than the high-end projection in the Sommers report.

### Tax revenue

Based on a projected 2000-2020 scenario of 23,700 new jobs and 10,000 new housing units, the Sommers report estimates that **between 2005 and 2025 a cumulative tax revenue of \$1.3 billion could be generated by SLU development activities**. From 2004 to 2010 new development in SLU resulted in an additional \$35 million in tax revenue to the City of Seattle. Analysis by the Downtown Seattle Association has shown that a typical mixed-use high-rise building generates annual property taxes of \$680,000 per acre of land, compared to just \$32,000 per acre for a surface parking lot (see adjacent bar chart).

### Investment

**Since 2004, an estimated \$2.7 billion has been invested in private development in the SLU neighborhood**. An additional \$289 million was invested in infrastructure, including affordable housing, parks, streets and transit, 35 percent of which came from the private sector. Major projects include the Mercer corridor (\$161 million), the Seattle Streetcar (\$52 million), and Lake Union Park (\$30 million). As redevelopment continues over the coming years, it can be expected to catalyze further synergistic investment from both the public and private sectors.

## Maximizing Return on Public Investment

A high return on public investments in SLU hinges on enough people to enjoy the benefits provided by those investments. For example, the City has recently invested in three parks in the neighborhood, bringing total open space in SLU to 15.7 acres. Based on the City's guidelines, this is more than enough open space to serve the estimated 2031 targets for housing and jobs. Similarly, the streetcar has additional capacity, and streetscape improvements throughout the neighborhood are setting the stage for more pedestrians and cyclists.

## TRANSPORTATION

SLU has great potential to become an urban neighborhood in which walking, biking, and transit are attractive and widely used alternatives to the private automobile. This will help reduce both environmental impacts and household living expenses.

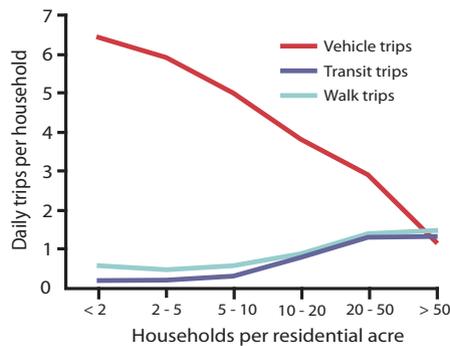
Outside of the downtown core, **SLU represents Seattle's best opportunity for accommodating growth while minimizing the increase of vehicular traffic on the City's roadways.** Fully leveraging that opportunity hinges on robust private development, and Alternative 1 offers the flexibility that will be key to making this happen.

### Providing Transportation Choices

SLU is particularly well-situated to embrace alternative transportation because:

- It is centrally located, adjacent to the downtown job center, close to the University of Washington, and surrounded by residential neighborhoods to north, east, and west.
- The existing street block network is relatively dense, an important ingredient for walkability.
- It has a streetcar line that will likely be expanded.
- It has jobs that provide opportunities for people to live and work in the same neighborhood.

There are several factors that correlate with reductions in travel by single occupant vehicles, including population density, jobs/housing balance, transit service levels, intersection density, and bicycle and pedestrian infrastructure. It turns out that residential density is a good proxy for these factors, and the relationship to travel mode shown in the graph to the left is typical of what has been observed in cities nationwide: In short, *more density = less driving.*



Research in cities nationwide has shown that as residential density increases, travel mode shifts from cars to transit and walking. Source: John Holtzclaw, Metropolitan Transportation Commission, "1990 Household Travel Survey" (1997)



The streetscape pictured above on Terry Ave south of Republican St in SLU received major upgrades as a result of adjacent redevelopment. Enhancements include widened sidewalks, curb bulbouts, and overhead weather protection.

Photo: Lesley Bain

### What's missing in SLU

**The most important piece of this puzzle that's still missing is a sufficient population of neighborhood residents and workers to take advantage of the above opportunities.** In recent years, development has brought new homes and jobs to the neighborhood, but there is room for much more. Progress to date is revealed by pedestrian counts conducted by the Downtown Seattle Association in late 2010 that show pedestrian traffic at Westlake and Harrison in SLU was up 59 percent from 2009.

## LIVABILITY AND URBAN DESIGN



When building heights are limited, the most viable design solution is often a bulky, monolithic form that fills the available zoning envelope, as exemplified in SLU's Mirabella Retirement Community, pictured above. Photo: Dan Bertolet



These residential buildings located in Vancouver, BC, illustrate how slender towers built on podiums can both create opportunities for open space, and preserve long-range views between the towers. Photo: Bing.com, courtesy of USGS



Street-related entries and a tower set back above the second floor creates a pleasant streetscape in front of the 2200 Westlake mixed-use high rise, located just south of the SLU neighborhood boundary. Photo: Dan Bertolet

New development in SLU presents a huge opportunity to enhance livability through thoughtful urban design. **Taller buildings facilitate superior options for a high-quality built environment and public realm.** Alternative 1, because it is most flexible with respect to height, is the best choice for enhancing livability.

### Height and Form

Urban neighborhoods benefit from a rich diversity of building form. One of the most important design considerations for achieving that end is the trade-off between bulk and height. Restricted height results in uniformly squat, bulky buildings. In contrast, greater height enables tall slender towers atop relatively short podiums, a building form that can provide benefits in many areas, including:

- *Pedestrian environment:* The average person on the street is aware of the podium portion of the building only, and the result is a more open-feeling streetscape.
- *Open space:* When building floor space can be accommodated in tall towers, it is possible to pull back the base of the building from the property line to create wider sidewalks, plazas, or pocket parks.
- *Views:* Tall, slender towers can actually have less impact on views because views are preserved between towers. In contrast, shorter, bulkier buildings tend to wall off views.
- *Shadows:* Tall buildings cast longer shadows, but compared with the shorter, bulkier alternative, the tower/podium form typically has reduced shadow impacts on the public right-of-way because the towers are set back.

### Real-World Versus EIS Scenarios

To explore worst-case scenarios the DEIS analysis assumes buildout to full capacity, with the caveat that "it is unlikely that full build-out would ever occur..." But even under those conditions, **the DEIS finds "no significant adverse environmental impacts" with respect to views or shadows for any of the alternatives.**

In the real world, maximum buildout is improbable—a continuous wall of towers, for example, is a highly unlikely outcome. In addition, all three DEIS alternatives include a provision that sets a maximum of two towers per block (reduced to one tower on blocks near Lake Union). Even when zoning allows taller buildings, redevelopment occurs slowly over time, and the combination of newer buildings with existing buildings would maintain a diverse built environment.



Cascade Playground, located adjacent to a mid-rise apartment building, provides an important neighborhood amenity for families with children.



Restaurants and cafes that spill out onto the sidewalk bring life to the neighborhood streets, creating a safer and more enjoyable experience for pedestrians. Photo: Dan Bertolet

### The benefits that new development in SLU can provide to the City of Seattle include:

- preservation of Seattle's lower-density neighborhoods if a greater share of the City's growth is directed to SLU
- provision of affordable housing in a neighborhood where car-free living is an attractive option
- reduced traffic impacts and less greenhouse gas emissions, because on average, future residents of SLU will drive less
- reestablishment of connections that will knit together surrounding neighborhoods of Capitol Hill, Eastlake, Queen Anne, and the Denny Triangle

## QUALITY OF LIFE

**The redevelopment of SLU will benefit the neighborhood, the city, and the region.** And the key to maximizing these benefits is zoning that offers the greatest capacity and flexibility.

### A Complete Neighborhood

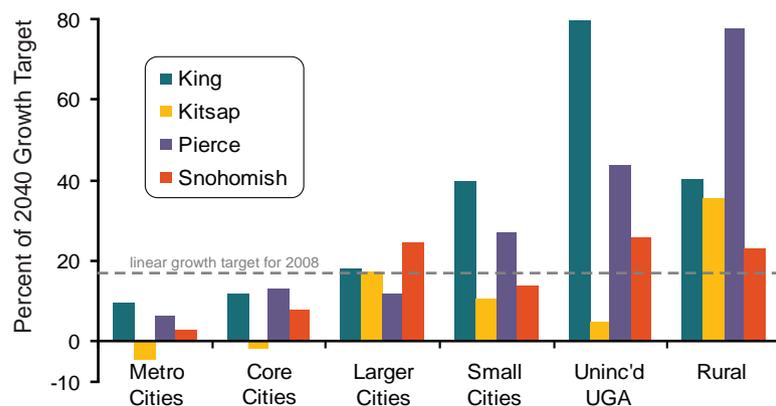
Success for SLU is the achievement of a vibrant, healthy neighborhood that offers a high quality of life to people of all incomes, ages, ethnicities, and cultures. Creating such a place requires a balanced combination of uses, services, amenities, building form, and open space.

Today SLU already has jobs, parks, transit access, and a desirable location. But it lacks many of the services and amenities typically found in a residential neighborhood because revitalized blocks are often separated by many underused blocks that have fallen into disrepair. Increased development, including significant housing, will act as a catalyst for new businesses that will round out the neighborhood. And as more and more people live, work, and play in SLU, it will evolve into a complete neighborhood, where the streets are active most hours of the day, and evenings are safer because there are "eyes on the street." And last but not least, a walkable SLU will help enhance the physical health of its residents.

### The Central Puget Sound Region

At the regional scale, the quality-of-life benefits of new development in SLU include:

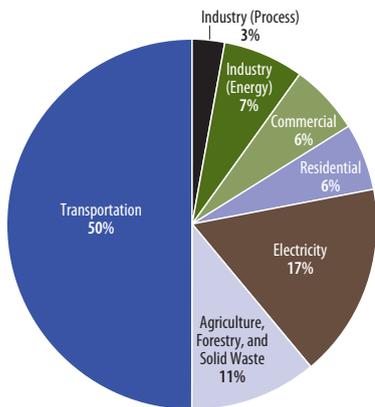
- preservation of farms and forests, because accommodation of growth in SLU would reduce development pressure at the urban fringe
- reduction of the "drive till you qualify" effect by providing centrally located housing and jobs
- reinforcement of Seattle as the hub of the regional transit network
- reduced demand on already overcrowded regional roadway networks.
- progress towards the goals of regional growth management (see chart below)



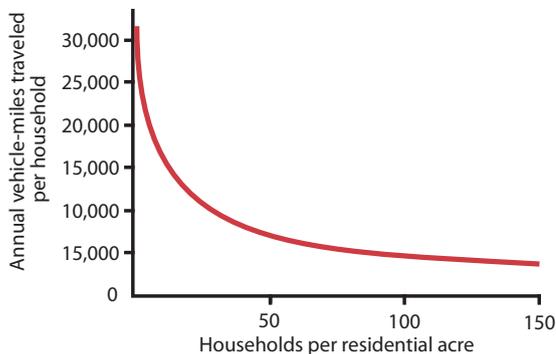
The chart above shows how growth in the central Puget Sound region has been occurring at the highest rates in small cities, unincorporated land outside urban growth boundaries, and rural areas. Meanwhile metro, larger, and core cities are lagging behind their growth targets. Achieving regional sustainability will depend on a reversal of this trend, with more growth being accommodated in existing urban centers such as South Lake Union. Source: Puget Sound Regional Council.

## CLIMATE CHANGE

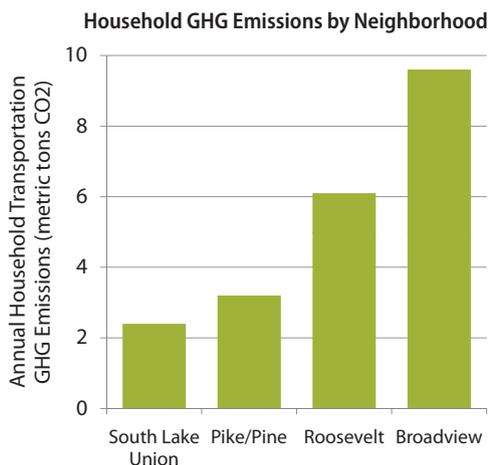
Climate change is the defining environmental challenge of our time, and **SLU presents an unmatched opportunity to create an urban center that enables low-carbon lifestyles.** The critical factor in achieving that end is sufficient new development to bring a high concentration of housing and jobs to the neighborhood, and success will depend on zoning that facilitates that outcome.



Sources of greenhouse gas emissions in the central Puget Sound region  
Source: Puget Sound Clean Air Agency (2000)



In cities worldwide, research has shown that as density increases, people drive less. Source: John Holtzclaw et al., "Location Efficiency: Neighborhood and Socio-economic Characteristics Determine Auto Ownership and Use," (2002)



Source: Center for Neighborhood Technology; <http://htaindex.cnt.org/>

### Greenhouse Gases and Driving

In the central Puget Sound region, transportation is the largest source of greenhouse gas (GHG) emissions (see adjacent pie chart). And in cities worldwide, researchers consistently find that as residential density increases, people drive less, which directly translates to reduced GHGs (see adjacent graph).

The Center for Neighborhood Technology has developed a model that estimates household automobile GHG emissions based on land-use characteristics and transit access, and their Chicago-based studies have shown "78 percent reductions for households living in central business districts." Household GHGs estimated by their model for four Seattle neighborhoods are plotted in the adjacent bar chart. SLU scores the best because of its high number of jobs and good transit access, demonstrating the opportunity it presents for accommodating low-carbon households.

### DEIS Analysis

The DEIS projects increases in *total* greenhouse gas (GHG) emissions under all three alternatives, which would be expected, given that there will be more activity and buildings. However, it is more relevant to consider emissions on a per-capita basis, because if those new homes and jobs did not go to SLU, they would most likely end up in a less urbanized area elsewhere, resulting in significantly more climate-changing emissions. According to the DEIS, **per-capita peak travel GHG emissions in SLU under the Alternative 1 buildout scenario would be 15 percent lower than emissions in the Bel-Red corridor in Bellevue and Redmond.**

### Embodied Carbon

The GHG emissions that result from the construction of buildings are known as embodied carbon. In general, compact development can be expected to have relatively low embodied carbon simply because fewer materials are required. Concrete has more embodied carbon than other construction materials, but when considered on a per-capita basis, high-density building types can more than make up for that. For example, a 2006 Toronto-based study estimated that the **embodied carbon per resident was 35 percent lower in the high-rise residential case compared to the single-family case.** Assuming that high-density development in SLU would absorb growth that otherwise would have resulted in lower-density development elsewhere, the net impact would be reduction of embodied carbon region wide.

## ENERGY AND WATER

### Energy

The operation of buildings, including those in industrial use, accounts for nearly half of all energy consumption in the U.S. **New development in SLU can reduce the impact of our regional growth on energy demand.** And allowing for the the highest buildout capacity in SLU will help maximize this benefit.

Compared to typical low-density suburban development, high-density buildings in SLU are inherently more energy-efficient because of the shared wall effect, and because housing units tend to be smaller. For example, a 2011 EPA study found that on average, energy consumption by multifamily homes is half that of single family homes.

In addition, SLU's incentive zoning will likely require LEED certification, which studies have shown can reduce building energy consumption by at least 20 percent. And lastly, because Seattle's energy code is the most stringent in the svtate, buildings developed in SLU can be expected to be more energy-efficient than those outside the city limits.

### Water

**New development has the potential to reduce toxic runoff to Lake Union and Puget Sound.** Today the SLU urban center is almost entirely covered by impervious surfaces, such that nearly all precipitation becomes runoff, with very little infiltration or ground-water recharge. About three-quarters of the neighborhood is connected to a combined sewer system, and in the remaining area, stormwater flows untreated into Lake Union. In either case, the reduction of stormwater flows would help reduce water pollution.

Every new development project in SLU will present opportunities to mitigate the negative impacts of impervious surfaces and associated stormwater runoff. Green roofs, rain gardens, and pervious pavement are three of the most common strategies. Green roofs have the greatest potential, and can reduce stormwater runoff by two-thirds or more. Seattle's "Green Factor" code, which will become applicable to SLU when a rezone is adopted, will require new projects to implement some combination of these strategies.

The DEIS notes that increased vehicle traffic to support new development could result in more runoff pollution from streets. But that assessment is short-sighted because it ignores the regional picture. As discussed previously, the increased density that will come with redevelopment in SLU can be expected to reduce *per-capita* miles driven in the greater Seattle area, resulting in less runoff pollution overall.

Lastly, redevelopment will increase potable water consumption at the local level. However, because new buildings can be expected to be more water-efficient than existing buildings, per capita water consumption would actually be reduced.



The Terry Thomas office building in SLU, completed in 2008, incorporates passive heating/cooling strategies, which eliminate the need for air conditioning, and will lead to an estimated 30 percent reduction in energy use. Photo: Dan Bertolet



Green roof on the Bart Harvey, an apartment developed by the Low Income Housing Institute in 2010 that provides 49 units of affordable housing for low-income seniors. Photo: Michael Seidl



Rain gardens infiltrate stormwater runoff at Taylor 28, a new mixed-use multi-family housing project at the corner of Denny Way and Taylor Ave in SLU. Photo: Dan Bertolet



### **About this document**

This Environmental Benefits Statement was funded by: Equity Office, Fred Hutchinson Cancer Research Center, The Kenney Family, PEMCO, Rich Reel, The Seattle Times Company, Touchstone Corporation, and Vulcan Inc.

With Participation from other SLU Property Owners Group Members: The Blume Company, John Goodfellow, The Justen Company, The Lowen Family, Sellen Construction, and Walsh Construction.

For more information on the South Lake Union height and density alternatives, please visit the Seattle Department of Planning and Development website: [http://www.seattle.gov/DPD/Planning/South\\_Lake\\_Union/Overview/](http://www.seattle.gov/DPD/Planning/South_Lake_Union/Overview/)

For more information on the neighborhood, please visit the South Lake Union Community Council website: <http://www.slucommunitycouncil.org/>

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 Wells Fargo Insurance Services

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April 8, 2011

City of Seattle  
 Department of Planning and Development  
 700 Fifth Ave., Suite 2000  
 Seattle, WA 98124-4019

Dear Mr. Holmes,

Over the past few years South Lake Union has become a powerful nexus of research for some of our region's leading growth tenants in biotechnology and global health.

We were surprised to find out that the EIS for the South Lake Union rezoning contemplated maximum office tower floor plates of 24,000SF. Many of the tenants in life sciences have complex ventilation requirements and collaboration needs which make floor plates of 30,000-35,000 much more optimal. This programmatic requirement is one we hear again and again from growth companies looking for space in the region.

The life sciences represent one of Washington's five largest and fastest-growing sectors spanning the state, with the majority of those companies in Seattle. A recent report by the Washington Research Council states, "From 2007 through 2009, the number of life sciences jobs grew nearly five percent to 26,300. Over the same period, jobs in Washington's other private sectors decreased by four percent." A majority of those jobs are in Seattle, many of them in South Lake Union.

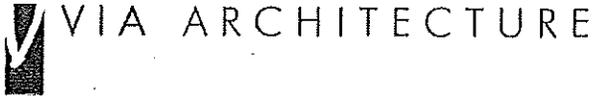
States and nations are, as Congressman Inslee recently said, "...in a knife fight to attract the industry." We have a solid base of life sciences here in Seattle. Continue growth of the industry in South Lake Union is good for Seattle and the region.

Please consider studying alternatives in the final EIS to accommodate towers that meet these programmatic requirements.

Sincerely,

Chris E. Rivera,  
 President

*The Washington Biotechnology & Biomedical Association (WBBA) is an independent, non-profit 501(c)(6) trade association serving the life sciences industry in the state of Washington. Our members include organizations engaged in, or supportive of, research, development and commercialization of life science technologies.*



April 11, 2011

James Holmes, Senior Urban Planner  
City of Seattle Department of Planning and Development  
700 Fifth Ave., Suite 1900  
Seattle, WA 98101

Re: South Lake Union Height and Density Draft EIS Comments

Dear Mr. Holmes

Congratulations on the issuance of the draft EIS. We are pleased to see the city and the neighborhood advance the study of more intensive building form in South Lake Union. Ultimately we feel this neighborhood is the right place for growth given the close proximity of downtown, the amount of underutilized land and the intensive investment in public infrastructure and private sector development.

I have been actively involved in South Lake Union over the last 7 years providing countless hours of civic participation and professional input on urban design, planning and city building. This includes contributions to The SLU Framework Plan, The Uptown/SLU Joint Visioning Charrette, Two-Way Mercer Stakeholder Committees and as Chair of the SLU Seattle Design Review Board. My firm, Via Architecture is currently collaborating in the crafting the SLU Mobility Plan and has over 25 years of experience shaping communities in Canada and the Western US including the Masterplans for Vancouver, BC's Concord Pacific, and S.E. False Creek's Olympic Village. We bring an informed range of experience in municipal, transit and community planning and a deep understanding of public and private sector development and implementation around urban re-zoning initiatives.

We are very supportive of alternative 1 as it yields the most public benefits and the best outcome for the community. The key at this point is to strengthen the viability of the EIS so we can eventually compose development standards and write ordinances that strive for improved livability and uphold best urban design principals appropriate to this neighborhood.

Thank you for reviewing our enclosed comments. Feel free to contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Roewe', is written over a grey rectangular redaction box.

**Matthew H. Roewe, AIA, LEED AP**  
Director of Mixed Use and Major Project

Alan Hart AIA  
Graham McGarvo AIA

1809 Seventh Avenue  
Suite 800  
Seattle, WA  
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tel 206 284.5624  
fax 206 624.5624  
o@via-architecture.com  
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1

**Current zoning:** The South Lake Union neighborhood has rapidly outgrown the current zoning, which was intended to be a transition from industrial to commercial. Clearly this place wants to be and is becoming a more vibrant and complete community. The proposed concept in the EIS of one or two small floor plate towers per block on low podiums is a good premise to assure a more welcoming distribution of urban form, light, air, sun and views.

1 cont

**We are very supportive of alternative 1** as it yields the most public benefits and the best outcome for the community. As with any incentive based system, the devil is in the details. We offer recommendations to improve the outcome in our comments below. The key at this point is to strive for improved livability and to establish great, yet flexible development standards that uphold best urban design principals appropriate to this neighborhood.

In our review of the draft we have the following comments, clarifying questions and recommendations for you and your team to consider or address in the final EIS report.

## Chapter 1 & 2 - General Issues

1. The nature of a programmatic EIS is to examine impacts and suggest mitigation. In general this study appears to focus more on the negative aspects of the alternatives rather than the more beneficial outcomes. There are no economic development benefits such as increased job creation, private sector investment, and subsequent forms of business, sales and property tax revenue generation resulting from the alternatives. Also, the environmental impacts of doing less intensive development elsewhere in the city has not been compared with the EIS alternatives. The draft study has put considerable weight on issues like traffic impacts, public services and utilities in this location, but there is no comparison of the same impacts created by the same number of new residents and commercial activity in another, less dense, less infrastructure rich and transit served location.

2

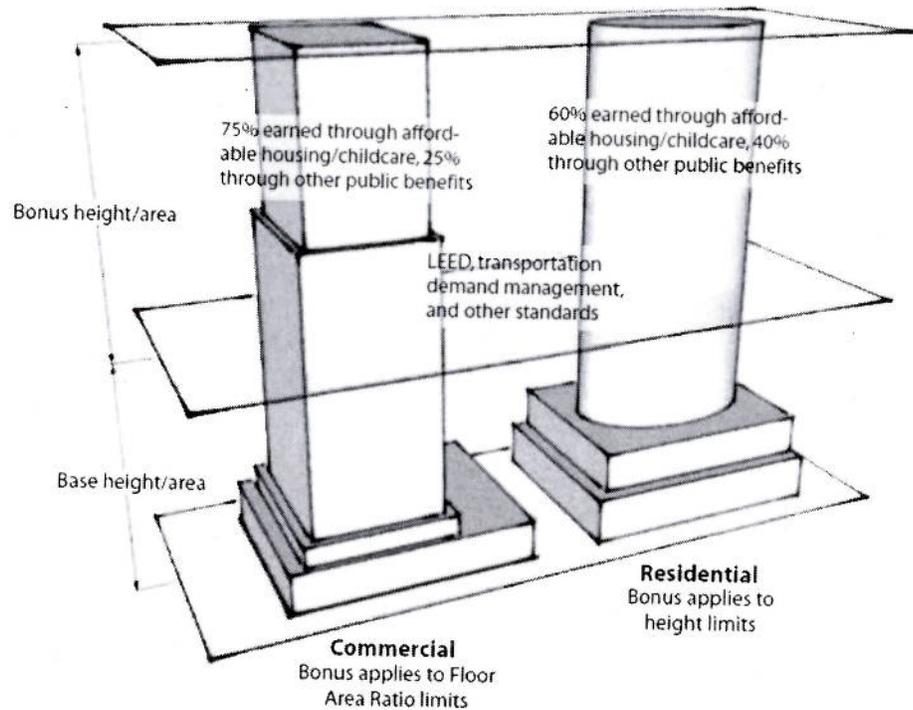
This study, in the spirit of the comprehensive plan objectives stated in section 1.3, must answer the questions regarding growth:

- i. *If not here, where?*
- ii. *What is the economic and environmental difference between accommodating growth here vs. someplace else?*

2. **South Lake Union Mobility Plan** - Transportation Sections: Please refer to and incorporate the strategies recently published in the South Lake Union Mobility Plan into the final EIS. This plan was thoroughly vetted with the community and with stakeholders and it responds to the unique set of evolving development, infrastructure and transportation circumstances in the district. The Mobility Plan was not available for the draft EIS study, but now it offers new recommendations, strategies and sheds new light on how the neighborhood and governing agencies can better respond to these proposed opportunities in the EIS Alternatives. 3
3. **Uptown/SLU Joint Visioning Stakeholder Charrette:** Continue to reference and use The 2008 Uptown/SLU Joint Visioning Stakeholder Charrette recommendations. The participation of over 40 groups in this effort was very balanced and comprehensive. Specifically to this EIS the group supported: 4
- Developing density around public investment.
  - Create a flexible neighborhood based incentive program.
  - Develop a strategic housing plan for the entire city and craft specifics for SLU.
  - Use TDR's for historic properties and affordable housing within the neighborhood.
- The SLUCC has this document on their web site:  
[http://www.slucommunitycouncil.org/docs/UptownSLU\\_JointVision.pdf](http://www.slucommunitycouncil.org/docs/UptownSLU_JointVision.pdf)
4. **The 2010 SLU Framework Plan:** Please also continue to reference and use The 2010 SLU Framework Plan. However, we find that the view corridor upper level setbacks in that document are unnecessarily deep, onerous on smaller property owners and need further examination in the crafting of the post EIS ordinance. 5
5. **Incentive Programs, Page 1-4, 1-5:** The study should roughly quantify the amount of affordable housing dollars established by incentive programs by each alternative. Our own rough estimation finds that this number is very substantial. 6
6. **Incentive Programs, Page 1-4, 1-5:** The study should calculate and state an approximate dollar value on the other public amenities (other city bonus options) generated from the 40% factor of the increased capacity in the incentive program. The "other city bonus options" should be stated as "public amenities and/or benefits" with listed examples such as open space, public plazas, wider sidewalks, landscaping, community facilities, etc. Ideally this program would provide more flexibility than past city incentive standards by establishing a menu of choices that can be defined by the neighborhood plans (SLU Framework Plan and Joint Visioning Charrette) and with the discretion of the design review board for project specific suitability. We suggest that the detail of these issues wait until after the Final EIS and be further vetted in the follow up development standard ordinances. 7

7. **Incentive Programs**, Page 1-5 per 23.58A: The following diagram was published by DPD in the 2010 SLU Framework Plan, page 32. Please clarify if just the 60/40% rule applies to all structures or if the 75/25% rule for commercial buildings is intended to apply to that use as well. The percentages affect both issues list above.

8



8. **Affordable Housing**, Page 1-6 Bullet 5: Our research of the neighborhood indicates that there are few, if any, housing units that would be displaced in these alternatives. There is a clear lack of older housing stock in the up-zone areas. We believe these are limited to one small triplex on Harrison Street and 8<sup>th</sup> Avenue and four small multifamily structures totaling 16 units on the block of Republican between Boren and Fairview. There are a few older apartments in the Cascade District, but they are likely to end up protected by landmark status or they are not on large enough lots to support high-rise. Other than these, the housing in the neighborhood up-zone areas are all relatively new, multi-floor construction and they are very unlikely to be removed. We think this lack of impact is not worthy of a summary bullet point inclusion. If this bullet point must remain, the claim that existing housing would be displaced should be equally applied to any alternative including Alternative 4 as current zoning could also affect the same limited number of housing units in the neighborhood.

9

9. **Schedule:** Please describe the anticipated next steps including the process to translate the EIS into an approved ordinance and the anticipated approximate schedule. South Downtown's rezoning has taken 5 ½ years and counting which has not helped that community evolve and develop. Uncertainty about any land owner or their neighbors can do with their property could kill the momentum underway in the neighborhood and literally put the district on hold until there is resolution of the change. Please advance this process along as quickly as possible. | 10
10. **Flight Path,** Section 2.2.3 and figure 2-4 and throughout: Please rationalize why the flight path has more than doubled from the initial flight path shown on the original scoping maps. | 11

*See next page*

## Chapter 3: Aesthetics

1. **Environmental Impacts Assumptions, 3.10.2– Tower Development Extent:** 12  
From the text of the Draft EIS:
  - *All undeveloped and under-developed sites will redevelop in the future. Under-developed sites are defined as those that contain development square footage that is 40 percent or less than currently.*
  - *Where individual parcels with separate ownership are contiguous and can be assembled to create a lot size of 22,000 SF or greater, a developer or property owner will do so in order to build the maximum gross building area allowable.*

We find these two assumptions above would not necessarily motivate demolition of an income producing property, given permitting takes years of entitlement process and expenses, the risk associated with our new economy markets and the unpredictable nature of construction financing needed to develop a high-rise. These assumptions should be scrutinized more deeply in a qualitative valuation (assessed land to building value ratio). This will likely reduce the total amount of towers and the overall impacts and mitigation across the study spectrum.
2. **Photo Image Dates, Figures 3.10-2, and pages 3.10-9 thru 3.10-12:** Photo images using the specific date “2031” based on 2031 growth targets is speculative and may give the viewer a sense of certainty. These labels should be either stated as a percentage of the total build out or as “Targeted Growth 2031”. 13
3. **Realistic Growth Illustration, Pages 3.10-13 through 3.10-16 Environmental Impact Images:** The study states on page 3.10-44 that: *All of the alternatives assume that every vacant or underdeveloped site is built out to its maximum potential.* Thus, a full build out time horizon is indefinite and may never happen. However, the viewpoints photomontage visuals are shown with 100% build-out. In all fairness, there should also be a complimentary image with the modeling of the “Targeted 2031” year projections in a third photomontage (similar to the aerial comparisons shown on pages 3.10-9). 14
4. **Graphic Clarity, Figure 3.10-2 and elsewhere - Environmental Impact Images:** Please indicate what each color in the modeling represents. The purple and blue appear to be commercial but it is not clear what they specifically represent and how they are different from each other. 15
5. **Photo Images, Pages 3.10-22 through 3.10-38 Environmental Impact Images:** The massing studies shown in these images should show upper level setbacks concurrent with the concept of a podium and with the design review guidelines for this area. Additional levels of detail to show more sense of scale would also be welcome. 16

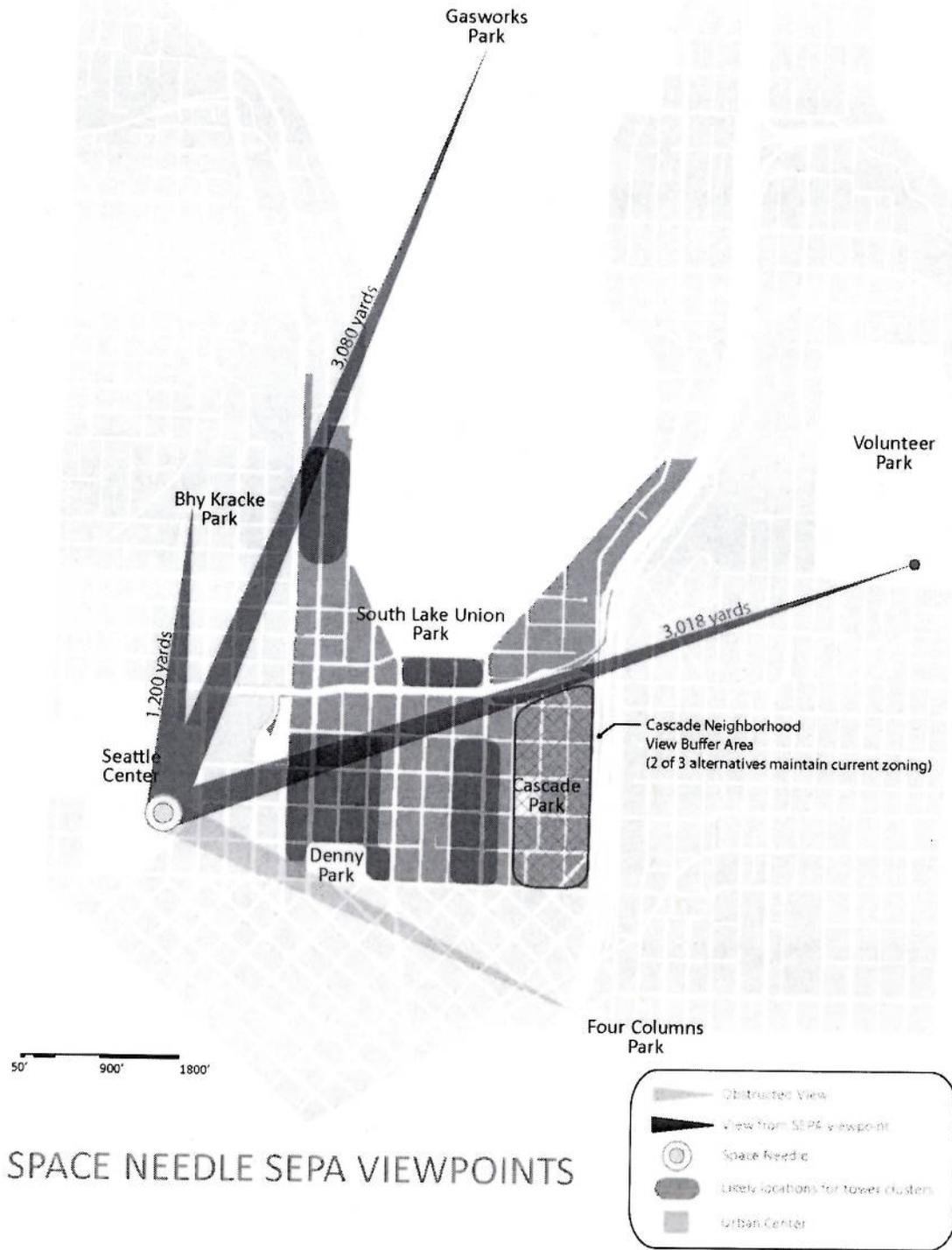
6. **Viewsheds & The Space Needle** 3.10-5 & Page 3.10-42:

It is important to clearly note in the Draft EIS that private views are not protected by the City of Seattle and Seattle Municipal Code Section 25.05.675 contains view protection policies that apply only to specified public view points, certain scenic routes and designated landmarks.

The Draft EIS should identify and reference the view protection policy in SMC 25.05.675.P, which was amended in 2001 to address views of the Space Needle. The background report, "Seattle View Protection Policies – Space Needle View Inventory & Assessment" (Volumes 1 & 2) identified locations where SEPA may be used as a basis for protecting views of the Space Needle.

Our review of this issue indicates that the Space Needle has only three protected "City-designated" public viewpoints through the study area (Volunteer Park, Bhy Kracke Park & Gas Works Park). Of these sites, only one (Volunteer Park) is situated where the rezone alternatives for the heart of South Lake Union could have a negligible effect of the view of the Space Needle. The FEIS study should clearly reference this document and delineate this condition in writing and with a precise map similar to the one on the following page:

*See image next page*



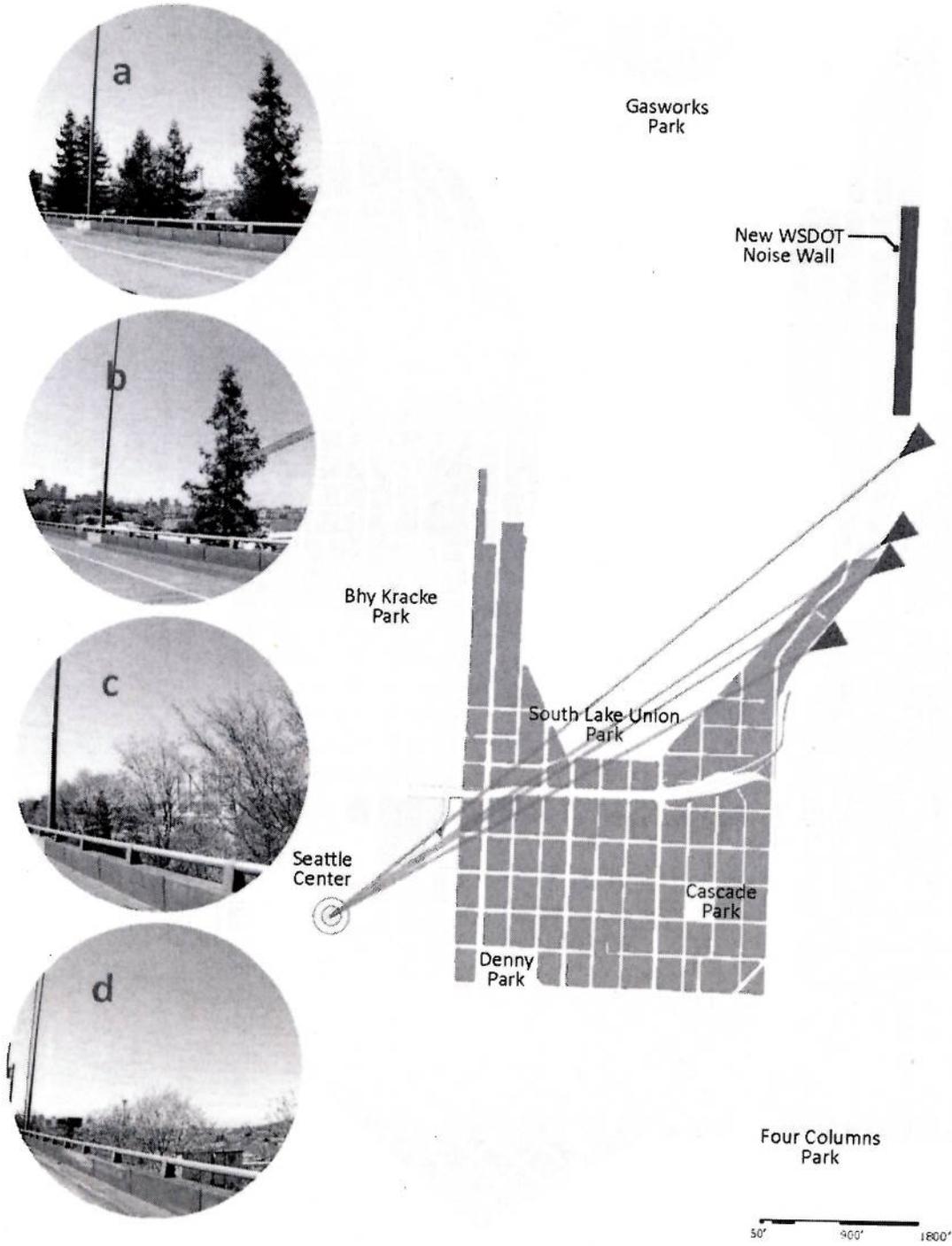
## SPACE NEEDLE SEPA VIEWPOINTS

7. **I-5 Scenic Routes Realistic Vistas**, Page 3.10-43: The image on the next page indicates that south bound I-5 scenic route views toward the Space Needle are often blocked by obstructions that include both vegetation and man-made features.

In 2009, the Washington State Department of Transportation installed the Eastlake/Roanoke noise wall along the western edge of I-5 from E. Hamlin St. to E. Newton St. and eliminated views west toward the Space Needle.

Other current visual obstacles that obstruct views to the Space Needle include evergreen and deciduous trees, the Zymogenetics building and smokestacks plus the Cancer Care Alliance Building. We recommend this information be included in the FEIS.

*See image next page*



I-5 SCENIC ROUTE SOUTH BOUND  
VIEW CONDITION

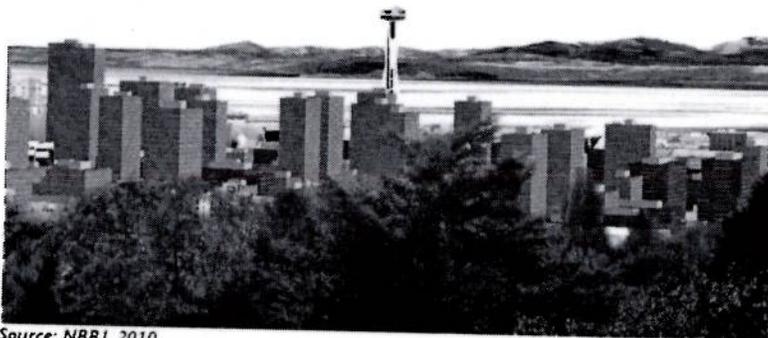
8. **Realistic Volunteer Park Vista**, Figure 3.10-23: The image below appears to be a cropped or telephoto lens. The actual human eye will more likely see this in a panoramic fashion similar to the image at the bottom. The FEIS study should represent this view point more as a wider angle view.

Figure 3.10-23  
Volunteer Park - Alternative 1

Existing



Proposed

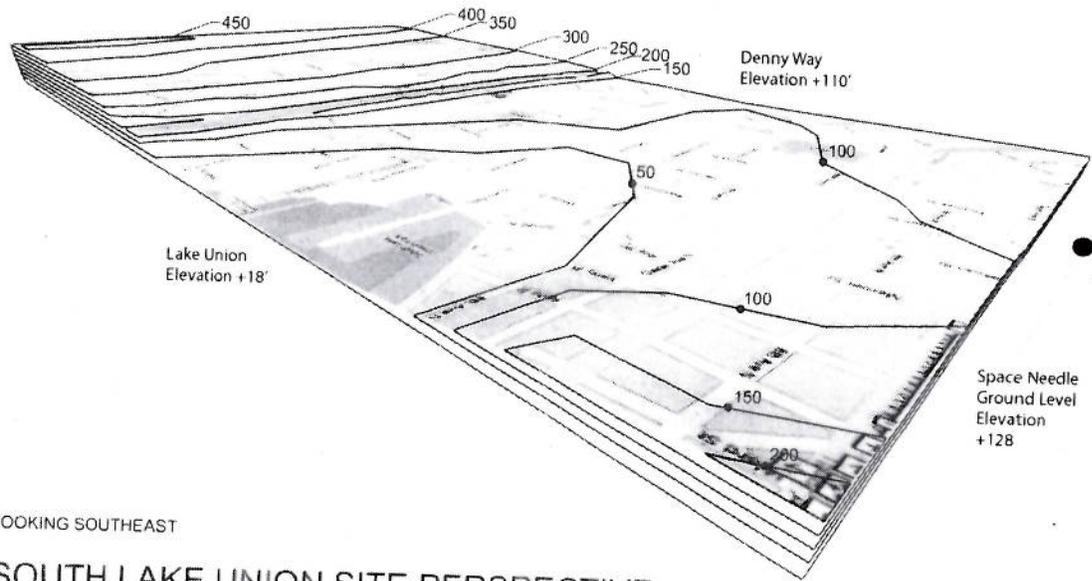


Source: NBBJ, 2010.



Actual Image from Volunteer Park's Tower with full horizon shown

**9. Relative Cross Section Study:** The South Lake Union neighborhood sits in a bowl shaped depression that drops over 100' from Denny to the lake. See Image Below:



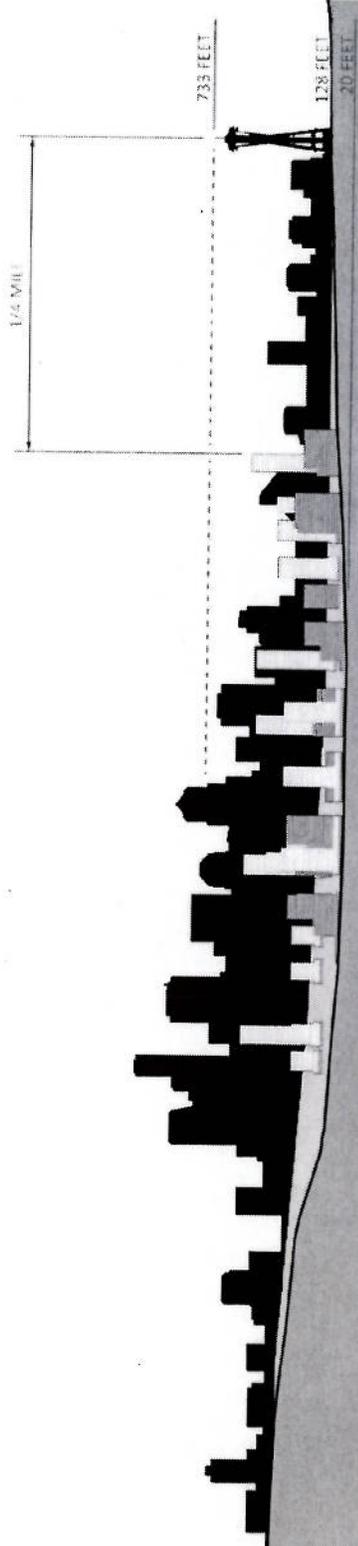
LOOKING SOUTHEAST

**SOUTH LAKE UNION SITE PERSPECTIVE**

Cross section studies of the district that include both existing buildings and the alternatives should be included in the FEIS.

Cross section studies would be a useful communication tool to allow better understanding of the aesthetic and view impacts of the proposed alternatives. We are providing the image on the next page as a sample. This image shows EIS Alternative 1 relative to the downtown skyline, the elevations of the lake and The Space Needle ground plane.

VIA ARCHITECTURE



Cross Section From Capitol Hill To The Space Needle

## Chapter 4: Reference, Appendices & Tables

1. **Clarify Commercial Parking Assumptions**, Appendix C, development capacity assumptions - parking: What assumption was made for commercial parking? Please clarify. | 21
  
2. **Consistency of Metrics**, Appendix C, development capacity assumptions – ratio of uses: | 22  
The mix of residential to commercial is stated as 55% residential and 45% Commercial. However per Table 2-2, it's 60% jobs and 40% housing units. Then on a per square foot basis the numbers calculate to 70% residential and 30% commercial. Please explain the rationale behind this assumption and what the intent is, or will be, in future development standards.

## Development Standards

The following recommendations relate to ways the development standards can be adjusted to assure better livability and overall outcomes for the public. These issues can be further studied after the FEIS in the follow up development standard and ordinance writing process. | 23

1. **Upper Level Setbacks**: The UDF recommendations for upper level setbacks (which range from 150' to 10') are often too deep, thus becoming onerous, anti-urban and overly prescriptive, especially for smaller properties that can't take advantage of the height incentives. We recommend reducing these setbacks. This can be further studied after the FEIS in the follow up development standard and ordinance writing process

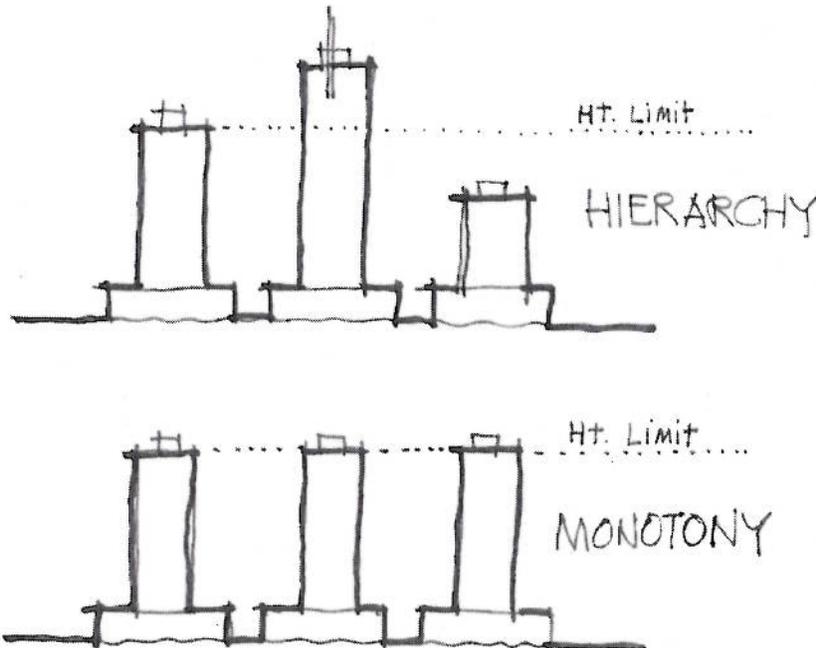
2. **Height Averaging:** Our examination of likely development sites shows that a pattern of tower clusters could easily occur in the district. Although this is a radical departure from the elements of the EIS, establishing a method to allow averaging heights between multiple clusters of towers should be considered after the FEIS in the follow up development standard and ordinance writing process. This may also require either a single ownership and/or agreements under one MUP application or development agreement.

Height averaging can offer improved public realm benefits and considerable relief to the monotony of a grouping of same size towers. This type of departure could be structured through rigorous design review for the right types of conditions in certain places. The total number of floors & floor area between the towers would remain the same.

Effectively Height Averaging can provide:

- Hierarchy & variety of form
- Better shadow control in the right places (pocket parks & plazas)
- Improved views through the site.
- Allows the development of iconic towers that can serve as beacons or landmarks.

See image below:



END



April 5, 2001

Seattle Department of Planning and Development  
Attn: James Holmes  
700 Fifth Avenue, Suite 1900  
P.O. Box 34019  
Seattle, WA 98124-4019

Dear Mr. Holmes:

South Lake Union Height and Density Alternative – Draft EIS

Thank you for the opportunity to comment on the Draft EIS for the South Lake Union Height and Density Alternatives proposal. Fred Hutchinson Cancer Research Center (“Hutchinson Center”) has participated actively through all stages of the development of the proposal, and appreciates the time, energy and effort that have been put forth by staff in bringing the proposal to its current state of development.

With two exceptions, the Hutchinson Center supports Alternative 1 as set forth in the Draft EIS. The two exceptions are:

- 1) Commercial floor plate size limitation, and
- 2) The suggestion that the Center be required to pay cash to the City in exchange for height increases.

Commercial Floor Plates

Alternative 1 would limit the size of commercial floor plates to a maximum of 24,000 square feet (sf). (Draft EIS at 2-19) Under current zoning, there is no maximum size of commercial floor plate on the Hutchinson Center property.

For the type of work (cancer research) conducted by the Center, 24,000 sf is an unreasonable limitation on the size of floor plate. Most of the current buildings on the campus are in the 30,000-40,000 sf range. Up to 40,000 sf floor plates are needed to provide appropriate efficiencies and scientific coordination among staff.

It would be unfortunate if the positive goals of the South Lake Union Height and Density Alternatives proposal were obtained at the cost of the Hutchinson Center’s mission to find a cure for cancer.

The current Hutchinson Center campus has received uniform design acclaim. There is no need to artificially reduce the size of commercial floor plates in order to obtain an aesthetic return. As our campus demonstrates, large floor plates, needed for high technology research and development uses, can coexist with pedestrian friendly, human scaled design.

2 cont

### Incentive Zoning

Under Alternative 1, maximum height limits on the Hutchinson Center property would be increased to 125 feet. (Draft EIS at 2-18) The Center strongly supports this change. However, the Draft EIS suggests that this height increase would be available only in exchange for a cash payment from the Hutchinson Center to the City. (Draft EIS at 2-16) The Center expresses no opinion as to the propriety of such a scheme in connection with private commercial development. However, imposing such a charge upon the Hutchinson Center would run contrary to public policy.

3

The incentive program described in the Draft EIS states that “an incentive program offers development bonuses, usually in the form of additional height or floor area, for development projects that offer public benefits and amenities.” (Draft EIS at 2-16) In the case of the Hutchinson Center, the additional height should be allowed in exchange for the ground-breaking cancer research conducted at the Center each day. To require the Center to pay millions of dollars to the City as payment for the right to build to 125 feet frustrates the goal of maximizing our limited resources for the pursuit of its central mission.

The Hutchinson Center therefore respectfully asks the City to provide that its mission – to find a cure for cancer – constitutes the necessary “public benefit” which justifies the height increase to 125 feet. No additional cash payments to the City should be required.

We appreciate the City’s consideration of these comments.

Sincerely,



Scott Rusch, Vice President  
Facilities and Operations

**Holmes, Jim**

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**From:** Eric Russell [mailto:eric.russell@cityofseattle.gov]  
**Sent:** Monday, March 28, 2011 10:01 AM  
**To:** DPD\_Planning\_Division  
**Cc:** Eric Russell  
**Subject:** DEIS comment

I began working in downtown Seattle in 1991 and have watched the development of the city ebb and flow since that time. During that time the city has gone from discouraging height and density in the downtown core to encouraging and welcoming the vitality it brings. There is now an opportunity for this same transformation to take place in the South Lake Union neighborhood by adopting Alternative 1 in the draft environmental impact statement. The additional density that would result from the increased building heights will create affordable housing due to greater housing stock, as well as incentive payments from developers. It will allow greater open space on the street compared to what is encouraged under the current zoning. It will also encourage greater use of transit and/or walking as more employment opportunities and retail stores are available in a compact area with adjacent housing. 1

Concern over view impacts from a few private locations should not be allowed to alter the greater good of increased heights. Building taller and skinnier actually would protect more views, by opening up sight-lines from areas that would be impacted by the current bulky buildings constructed from sidewalk to sidewalk. In addition, taller buildings will create a more interesting skyline, rather than block after block of 5 and 6 story buildings.

Adoption of Alternative 1 is the right thing to do to provide the most benefits and to maximize the city's resources.

Eric Russell

Holmes, Jim

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From: Katherine Sather [ksather@gmail.com]  
Sent: Friday, March 25, 2011 3:06 PM  
To: DPD\_Planning\_Division  
Subject: comment on urban density

To whom it may concern:

I work at an environmental nonprofit in downtown Seattle. Previously I lived and worked in the Southlake Union neighborhood.

I support more people and buildings in South Lake Union to prevent suburban sprawl. Our population is growing all the time. Now is the time to make good plans for that growth. South Lake Union has so much potential. It's close to downtown, the heart of the city. And there is room for plenty of local shops and businesses. We just need to help make it happen.

By allowing for urban density in South Lake Union, we'll support walkability, less dependence on cars and much more community transit.

While living in SLU, I was inspired by the new, independent businesses, the young people and the energy. But I often felt uncomfortable in some areas that needed more light, life and activity at night. We need to create more housing, jobs and opportunities in this neighborhood so it's safer and can support more people.

Please do the right thing and support growth in South Lake Union. It's the smart and sustainable way for Seattle's future.

Katherine Sather

**Holmes, Jim**

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**From:** Lyn Saucier  
**Sent:** Thursday, April 07, 2011 12:22 PM  
**To:** DPD\_Planning\_Division  
**Subject:** Support For SLU Height and Density Alternative 1

Hello,

My name is Lyn Saucier, and I am a commercial property manager for Chiles & Company. Our office is located in South Lake Union. My purpose in writing is to support height and density increases in commercial and residential development in the South Lake Union neighborhood, specifically Alternative 1. My reasons for supporting Alternative 1 are as follows:

- More density will provide South Lake Union businesses the "population" they need to survive.
- More density and activity will result in "safer" streets and more amenities.
- Using the existing infrastructure makes good economic sense.
- Taller buildings leverage our use of transit, roads and walkways.
- Taller buildings will result in more public benefits like contributions to affordable housing, pocket parks and open spaces.

I strongly urge you to adopt Alternative 1. This alternative provides the greatest potential for height and density increases, and therefore is the best choice for providing the most benefits to the South Lake Union Community and the City of Seattle.

Thank you for the opportunity to be heard.

**Lyn Saucier**  
Senior Property Manager  
Chiles & Company, Inc.  
901 Fairview Avenue North, Suite A100  
Seattle, WA 98109  
Direct Line: 206 270-4998  
Fax: 206 270-4991  
Cell: 206 380-9797  
Email: [lsaucier@chilesandco.com](mailto:lsaucier@chilesandco.com)

Holmes, Jim

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**From:** Tom Schauer [tom.schauer@gmail.com]  
**Sent:** Monday, April 11, 2011 2:32 PM  
**To:** DPD\_Planning\_Division  
**Subject:** South Lake Union Height and Density Alternatives Draft EIS

My name is Tom Schauer and I am a resident of West Seattle.

Regarding the City of Seattle's South Lake Union Height and Density Alternatives Draft EIS, I wanted to pass along my support for Alternative #1 (greatest height and density relative to the other alternatives). Seattle should maximize the opportunity uniquely afforded by South Lake Union, so greater height and density should be supported and encouraged.

The area of Downtown Vancouver, BC fronting Burrard Inlet, and between the Convention Center and Stanley Park, provides a great example of the successful implementation of greater height and density, while preserving green space and views. Office and residential towers front on large park spaces and waterfront promenades; public and private spaces are energized and used to their highest potential. South Lake Union is one of the few places, if not the ONLY place, in Seattle where similar dynamics could be achieved. Simply, the true potential of the area around Lake Union would be realized with greater heights and density.

Tom Schauer

April 11, 2011

Jim Holmes  
City of Seattle  
Department of Planning and Development  
PO Box 34019  
700 Fifth Avenue, Suite 2000  
Seattle, WA 98124-4019

Re: Comment Letter on Draft EIS for South Lake Union Urban Form Study

Dear Mr. Holmes:

On behalf of the Space Needle Corporation (SNC), thank you for the opportunity to comment on the Draft Environmental Impact Statement (EIS) for the South Lake Union Urban Form Study. The urban form study is of vital interest to us, because some of the alternatives under consideration have the potential for severely impacting the Space Needle and Space Needle area. For example, we are very concerned with the areas bordering the south and west of Lake Union, because an increase in height there has a significant potential for adverse impacts by walling off views both to and from Lake Union and the Space Needle area.

This letter addresses three topics. First, this letter begins with some background information on this city's most prominent landmark structure, so that you will have a better understanding of the importance of the Space Needle to our economy and the urban form of the city. Second, we ask the city to step back and identify specific objectives that should define the nonproject proposal studied in the DEIS. Third, we identify specific environmental impacts that must be studied further in the Final EIS so that our elected leaders can avoid any alternative that harms the Space Needle and Seattle Center areas.

As you review this comment letter, we want to highlight a paramount concern to us and that is the erroneous conclusion in the Draft EIS that there are no significant adverse impacts to views of Space Needle. This statement is made despite pictures in the Draft EIS showing very severe impacts to such views. The DEIS conclusion seems to be based on the erroneous belief that the Space Needle's legs are an insignificant part of our structure. As discussed further below, the tripod shape and steel legs are an integral part of the iconic shape and landmark structure. An alternative that cuts off our legs would be an alternative with a significant adverse impact warranting mitigation measures or new alternatives in the Final EIS.

1

**A. The Space Needle Is The Most Recognizable Icon of Seattle. It Should Remain the Dominant Feature Of The City's Urban Form. To accomplish this, heights should step down from the urban core to the shores of Lake Union.**

The Space Needle was built in 1962 for the World's Fair. Today, the Space Needle is undeniably the most recognizable symbol of Seattle. At 605 feet, it is not the tallest tower in the city; however, it is the most prominent, often appearing in photographs to tower over the rest of the city and even Mount Rainer. The Space Needle is one of two renowned steel tower structures in the world, the other being the Eiffel Tower in Paris. The prominence of the Space Needle is due in large part to the current urban form of the city. The city's height, bulk and scale policies have always created an urban form that accomplishes two things. First, it steps down from the city-center to Lake Union, allowing the Space Needle to serve as the counterpoint symbol of the city. Second, the policies are intended to reinforce natural topography so that the prominence of Queen Anne Hill and Capitol Hill are not dwarfed. (SMC 25.05.675G). We urge the city leaders to retain these policies, and an urban form that steps down in wedding cake tiers from the urban core to the shores of Lake Union.

2

**1. The City's Landmark Designation Recognizes the Significance of the Space Needle Views, including its full length, hourglass shape and tri-pod legs.**

In 1999, the city designated the Space Needle as a landmark, satisfying all of the city's criteria. The criteria include its prominence of spatial location, contrasts of siting and scale, and it is an easily identifiable visual feature, which contributes to the distinctive quality or identity of the city. Ordinance 119428. The Analysis of Significance described the importance of the Space Needle as an Urban Icon:

3

Anchoring the southeast corner of the Century 21 exposition site, the Space Needle embodied the beliefs of the time. Engendering awe due to its futuristic form and height, it was immediately seized as the new landmark for Seattle. Rivaling other familiar symbols of the region -Boeing's jets, Jimmy Hendrix's guitars, the mountains and waters that surround the city - over the years the Space Needle has remained the defining urban icon of Seattle. It has exerted aesthetic influence also in the fields of literature, art, film, and urban myths. The Needle is a pervasive presence within the city and is used as a geographical marker by visitors and Seattleites. Thus, it has become the identity symbol of Seattle for travelers from other regions, states or countries.

...

The Space Needle provides encompassing views of the city for visitors to its upper levels. Its exterior has been utilized continuously for display and

special events that affect the city or the region, such as holidays, sporting events, or fireworks celebrations. Through these festivities the Needle exhibits itself to the public. In return, it has become bound, as a civic image, with Seattle.

(Analysis of Significance, at page 6, July 10, 1997).

Thus, the city has recognized that both views *to* the Space Needle and *from* the Space Needle are important to locals and visitors alike. We must also point out that the Space Needle's significance relates to its *total* form; thus, the legs of the Needle and its unique shape from base to top create the icon. The legs are specifically called out in the Statement of Significance.

Some of the preliminary designs can be categorized as elaborations upon the "tethered balloon" or the "spiked flying saucer" concept. It was Ridley's idea of the cruciform shape and disk structure that focused the design efforts of the entire team for the rest of the schematic stage. Further development of the tripod structural system that was to evolve into the familiar image of the Needle is attributable to Victor Steinbrueck.

The Space Needle, as originally conceived, embodies in its form and construction that era's belief in commerce, technology and progress. Three pairs of slender steel legs curve inwards from a 102' diameter base to the 373' "waist" level and flair out into an hour glass form to hold a disc-shaped structure at the top, which is comprised of revolving restaurant, a mezzanine, and an observation deck.

...

The steel legs that make up the Needle were fabricated independently up to the 410 foot level by welding three, 36 inch wide flanges into triangular shapes. Above that level, the legs were comprised of two flanges, which fan out in a Y-shape and continue upwards to support the base of the restaurant level.

(Analysis of Significance, page 3-4.)

## **2. The City's SEPA Policies Protect Space Needle Views.**

In 2001, the city recognized the importance of the Space Needle in adopted view protection policies set forth in its SEPA ordinance. In adopting these policies, the city recognized that because of its size and siting in the urban landscape, the Space Needle is

3 cont

unique among Seattle's view protected landmarks. It further recognized that the Space Needle contributes in no small way to the legacy of vistas and views that define the city and give shape and character to its identity. (Seattle View Protection Policies, Vol. 1, Space Needle Executive Report & Recommendations, April 2001).

4

At the neighborhood level, at least two adopted neighborhood plans contain specific policies that serve to protect views to the Space Needle. For example, the South Lake Union Neighborhood Plan contains a policy to "[e]ncourage building designs that allow for public view corridors through the neighborhood to Lake Union and the Space Needle and natural light at street level." Policy 45, Page 78. The Eastlake Neighborhood Plan contains a policy to "[a]dopt development standards and guidelines to preserve or improve public views and view corridors along public rights-of-way and at street ends. View corridors and views would be identified, including existing and potential views of distant places like...the Space Needle..." Policy CD-2, Page IV-21.

It is vital that views to and from the Space Needle remains accessible, but it is also important that the Space Needle remain physically accessible, as well. The Space Needle is an important feature of the Seattle Center economy, which currently is at a crossroads since the untimely loss of our basketball franchise at a point that the macro economy degradation looks to bleed into the Seattle area. The Space Needle attracts 1.3 million visitors per year, and generates at least \$280 million per year in economic benefit to the region. If increasing development capacity brings traffic that increases the obstacles and delays for people to access the Seattle Center, then this would be a significant adverse impact to city revenues.

To be clear, we are not "no growth" advocates; to the contrary, we strongly believe in growth that improves the quality of life for our neighbors and the tax base for the City of Seattle. We do however believe that any future growth must occur consistently with our long-held policies on urban form and must be accomplished in a way that preserves the prominence of our city's premiere landmarks. With that in mind, please consider the following as you define the scope of the DEIS.

#### **B. Properly Define the Objectives of the Proposal in the Final EIS.**

At the outset of scoping, we asked why now, why here, why change? What purpose is being served by changing the urban form that has defined this city for so long? Have we not already just zoned downtown for greater density and height? Wouldn't we want to encourage that to fill in first to ensure a healthy downtown, before creating even more competition in South Lake Union?

5

These are not theoretical questions, but questions that should be answered in the Final EIS. The city's adopted SEPA rules state that the threshold step is properly defining the nonproject action to be studied in this DEIS. "Agencies are encouraged to

*describe public or nonproject proposals in terms of objectives rather than preferred solutions.*" SMC 25.05.060.

In our scoping letter, we also asked the city to define the objective the city is seeking to obtain that it cannot obtain by the current zoning. Section 1.3 of the Draft EIS sets forth some general objectives of the proposal. One goal for example is to advance the comprehensive plan goals to use limited land resources more efficiently, to pursue a development pattern that is economically sound, and to maximize the efficiency of public investment in infrastructure and services. We support these objectives. Yet, we have yet to see any analysis of why the existing zoning in our urban center does not already provide for implementation of the adopted Comprehensive Plan goals. We believe that the first step of the Final EIS effort should be to step back and assess if there is really any legitimate *public* objective to this effort.

5 cont

If a legitimate public objective can be defined, then we believe there are some additional objectives that should be used to define the proposal; as set forth below, you should only study alternatives in the FEIS that:

- Reinforce *natural topography* by controlling the height, bulk and scale of development consistent with SMC 25.05.675G.
- Retain the urban form that steps down from downtown to the shorelines of the city.
- Preserve the importance of the Space Needle to the urban form of South Lake Union and the city as a whole.
- Preserve views to and from the Space Needle.
- Enhance the Seattle Center economy.
- Reduce traffic congestion along the Mercer Corridor to ensure that the Seattle Center is accessible.
- Avoid piecemeal planning by ensuring that any alternatives are coordinated with the Shoreline Master Program update and evaluated in the same SEPA and GMA documents.

**C. South Lake Union Urban Form Study DEIS- Alternatives**

**1. Modify Alternatives Studied in FEIS to Account for FAA Restrictions.**

As discussed above, the city's current height, bulk and scale policies seek to reinforce natural topography, and seek to step down from the city center to the shorelines. These principles appeared to be threatened by several of the alternatives initially under consideration. The Draft EIS reduced the heights of the alternatives, eliminating from consideration 400 foot towers in most areas, with the exception of Alternative 1 that would allow 400' for residential towers between Denny and John streets. This is a step in the right direction; however, we are still very concerned about the heights. There appears to be no alternative (other than the No Action Alternative) that meets FAA requirements given the flight path and wake zone information contained in the Draft EIS. Therefore, we ask that the heights of all alternatives be modified in the Final EIS to account for this identified impact on flight safety.

6

## 2. Executive Summary of Impacts Should be More Meaningful.

As many people noted at the Draft EIS hearing, a better and more meaningful executive summary of the document would be helpful. Table 1-2 attempts to provide a comparison of the Alternatives and their impacts; however, the table is vague and misleading. First, the table does not really spell out any specific impacts. Second, the table states under most elements of the environment that the impacts are "similar" for all alternatives. (For example, under viewshed impacts, the chart suggests that the impacts are all "Similar" to Alternative 1, when it is clear that the impacts of Alternative 1 with its towers on the lakeshore are much more significant.) The Final EIS should do a more accurate, detailed and meaningful analysis to distinguish among the alternatives. Otherwise, perhaps new alternatives are necessary to really present the appropriate range of options as required by SEPA.

7

## 3. Elements of the Environment that Require Further Study.

We have comments on the following elements of the environment.

### Section 3.8 Land Use:

- **General Land Use Policy Review Should Include the Shoreline Management Act.** The Land Use Section begins with a general land use policy review. There is one glaring omission from the list and that is the Shoreline Management Act. The city is currently undergoing a mandatory review of its Shoreline Master Program. It appears that this proposal will have direct impacts to the shoreline. If so, the city seems to be improperly segmenting the SLU study from the Shoreline Master Program effort, which would run afoul of the SMA, GMA and SEPA. The SLU alternatives appear to affect land use and development regulations within the 200-foot shoreline zone and most certainly affect land use adjacent to the shoreline environment. Under the SMA, use policies must be examined not only for the shoreline area, but also for lands adjacent to the shoreline. RCW

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90.58.340. Under the GMA, the shoreline master plan and the zoning code development regulations need to be internally consistent. RCW 36.70A.070. Under SEPA, related actions should be studied in the same environmental document. WAC 197-11-060(3). Therefore, this SLU FEIS should be integrated with and processed with the planning effort underway for the Shoreline Master Program. We do not see that the SMA or SMP was even listed in Section 3.8.1, which discusses relevant state, regional and local planning policies. At a minimum, the Final EIS must add significant analysis on Shoreline Use, either as a separate chapter or as part of the Land Use chapter.

8 cont

- **Flight Path:** The second major topic of the Land Use section is focused on regulations and potential impacts associated with the flight path of float planes in and out of Lake Union. The topic includes FAA regulations, and a wind analysis that looks at wind shear and mechanical turbulence in the lee of buildings. This section of the EIS identifies that all of the action alternatives have a significant adverse impact. Yet, the mitigation is not fully identified or analyzed. The view sections do not show us what the modified urban form will be when buildings are lowered to meet this height limit. The Final EIS must modify all of the action alternatives to address the impacts identified in the Draft EIS. The Final EIS should fully evaluate alternatives with lower height limits in the area affected by the flight path and wake zone that will not run afoul of the FAA regulations.

9

**Section 3.9 Housing:** The city has a growth target, and contrary to statements in the Draft EIS, it would appear that a dramatic upzone in South Lake Union is not required to meet these targets. The existing adopted growth target for South Lake Union is 8,000 households by 2024. Comprehensive Plan, Appendix A. This number will likely be increased based on recent targets established for 2031 by King County and its Cities in order to accommodate population growth. The City of Seattle has not yet adopted its allocation for the 2031 targets; nor has it allocated portions of those targets to individual urban centers or urban villages. Seattle is expected to take up its allocation as part of the 2014 Comp Plan update. Because these allocations have not yet been adopted, the DEIS has assumed a target proportionate with the existing adopted plan for the purpose of the DEIS analysis.

10

Considering existing adopted growth targets, and even the DEIS estimated growth targets for 2031, it is not clear why the density proposals in the action alternatives are justified. The no action alternative alone appears to exceed the existing adopted growth target for South Lake Union, and only falls short of the DEIS estimated 2031 target by 400 units. DEIS at 1-16 and 2-8.

The city has recently upzoned downtown; yet, downtown is still well below its adopted growth targets. Would we be better off to allow for downtown to infill

before biting off a new upzone that will compete with downtown? Should the urban form help guide where density is appropriate to preserve and protect our views and our lakeshore area? These are some questions our policy makers will need to answer.

10 cont

### Section 3.10 Aesthetics:

- **Height, Bulk and Scale:** The city's current SEPA policy states that a purpose of the city's land use regulations is to "*reinforce natural topography* by controlling the height bulk and scale of development." SMC 25.05.675G. This policy is reiterated in the Comprehensive Plan, which seeks to establish "predictable maximum heights that respond to varying topographical conditions." LU 120. The city has always stepped down heights as it goes away from downtown toward the lakefront of Lake Union, responding to the flat valley between Capitol Hill and Queen Anne Hill. Moreover, the maximum legal height limit in the shoreline district is **35 feet**. How can the proposed heights of Alternatives 1 and 2 be considered consistent with this philosophy, or provide for adequate transitions?

11

- **Viewshed Analysis.** It is the city's policy to protect public views of the Space Needle from specific locales. Projects may be conditioned or denied to protect such views. Mitigating measures may include changes to the height, bulk, or profile of a development, requiring view corridors, relocating development on a project site and other measures. As discussed above, the city protects views to the Space Needle, but has also recognized that views from the Space Needle are important to preserve as part of our heritage, as well as part of our tourism economy and Seattle Center economy. Current Alternatives 1 and 2 show robust development that rings the Lake, no doubt resulting in adverse view blockage particularly in the areas to the south and west of the shoreline area.

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We appreciate the view analysis of the Draft EIS and Appendix D; however, the *text* of the Draft EIS completely misstates the impacts to the Space Needle from the alternatives and erroneously concludes "no significant impacts have been identified relative to protected viewpoints as a result of this programmatic analysis and therefore no mitigation is necessary." See, DEIS at Section 3.10.7. This is incorrect and must be changed in the FEIS. For example, under Alternatives 1 and 2, View #1 from Volunteer Park (a Space Needle protected viewpoint under the city's own SEPA policies), the base of the Space Needle would be screened up to about **one-third** of the tower height! See Figures 3.10-23, 3.10-31. Yet, these impacts are not identified by the DEIS as significant. The same is true for the other views depicted in the Draft EIS, including but not limited to Figures 3.10-29, 30, and Appendix D Figures 5. 25.

We urge you to revisit all of the view studies in the Final EIS and note the adverse impacts in the Final EIS. SEPA defines significance to be both about context and intensity. WAC 197-11-794. Here, part of the context is the landmark nature of the structure that is being protected. The legs of the Space Needle are a critical part of its form, and are specifically part of its historic landmark designation.

The pictures of the Draft EIS clearly demonstrate significant impacts cutting off over a third of this form and the entirety of the legs; the text of the Draft EIS is simply in error when it concludes this is not significant. The loss of Space Needle views as depicted in the Draft EIS is a significant adverse impact that must be identified in the Final EIS. Mitigation measures and alternatives must be developed that mitigate for this impact. In some cases, lower heights may be the appropriate solution. In other cases, such as for views down street corridors (such as Thomas, John or Harrison streets), upper level setbacks and view corridors may be a solution.

We also note that there appears to be no views of the Space Needle from the new South Lake Union Park. This is most unfortunate. As we have said, the City should adopt lower heights along the shoreline; spacing, view corridors or setbacks should also be required to allow for such views to the Space Needle. The City should also consider adding the new South Lake Union Park to the SEPA protected Space Needle viewpoints.

Another view issue is the views from the Space Needle. Appendix D (Figures 17-20) does include visual depictions of views from the Space Needle. The Final EIS should label where these views are from, for example the observation deck if that is the case. The Final EIS should also add such view studies for the 100 foot level. At that level, we have a banquet facility that is heavily used by the people of Seattle and visitors; we would like to better understand how the views from that level would be impacted by the alternatives.

Finally, we concur with the statements at the hearing asking that the Final EIS view studies correct a few technical issues. The FEIS should include the cumulative impacts of future tower developments in the Denny Triangle and Uptown area. The baseline conditions of the DEIS view studies appears to be in error, because it assumes no such future development. The FEIS should also include view studies from the human viewpoint, rather than just the bird's eye viewpoints of the Draft EIS.

- **Light and Glare:** The Space Needle is a prominent feature in the night sky. Often, it will be lit for special events, such as the Legacy Lighting for

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our 9/11 tribute. This lighting has become part of the culture of Seattle. The Final EIS should provide a discussion of the impact of the action Alternatives on the night sky, and the visibility of the Space Needle.

13 cont

**Section 3.11 Historic Preservation:** Given the scope of the proposal, the impacts to the Space Needle and its landmark status should be evaluated for each of the alternatives. This should not be a cursory examination but should be in the scope of the city's urban form as a whole, and the landmark designation of the Space Needle. At present, the Draft EIS does not identify landmarks outside of the subject area. See, DEIS Figure 3.11-1. Given the impacts to and from the Space Needle from the view blockage discussed in the Draft EIS, the FEIS should provide a thorough discussion.

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**Section 3.13: Transportation/Parking:** This is one of the most critical sections of the DEIS. We need to better understand how this DEIS will be coordinated with studies underway for the Mercer Corridor, and whether infrastructure and transit will be available concurrent with the development scenarios being studied, especially in light of the extreme density increases over and above adopted growth targets. We are also concerned about the precedent set by the new methodology for the traffic study. We agree with others at the hearing who pointed out that the information in the Draft EIS does not really explain how the consultant arrived at the new MIX model assumptions. For example, the assumptions about mode share appear to be very optimistic. We are also concerned that traffic impacts may be understated, for example by failing to account for bikes and pedestrian movements and conflicts with turning movements, as could occur on Mercer.

15

**Section 3.14 Public Services and Facilities:** The Seattle Center is in the process of redefining itself. It is no secret that the loss of the Seattle Supersonics has left a hole in the Seattle Center economy. The Center is a public facility and any action taken in South Lake Union has the potential to positively or negatively impact the health of our Center. The DEIS must study all impacts to the Center carefully. In addition, the new infrastructure required to support this density creates a financial obligation on the city for maintenance and programming at a time that the Seattle Center and area businesses are fighting to replace the lost visitation and revenues from the loss of the Supersonics with new events that benefit both tourists and Seattle residents.

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**Elements Not Addressed but Needed in FEIS:**

**Economics:** While economics are generally not a required part of an environmental study, in this case it is because the opening objective establishes a goal to have an "*economically sound*" development pattern. DEIS, Section 1.3. Without an economic study, the City cannot know if it is achieving its objective with the alternatives. In this era of global recession, we believe it is also a prudent part of the study either as part of the DEIS or a separate study. As discussed above, the

17

financial impact to the greater Seattle Center area economy and tourism economy to the city must be fully understood.

| 17 cont

**Construction Impacts:** We believe it is of paramount importance to examine the interactive and compounding impacts of the multitude of projects that are expected to take place over the next 10 years both in and near the SLU development area including two-way Mercer, the Gates Foundation, replacement of the Alaska Way Viaduct, shifting of the Cruise terminal, addition of new public transportation systems as well as the Century 21 Plan for the Seattle Center. A separate chapter or appendix on Construction Impacts would be warranted in the FEIS.

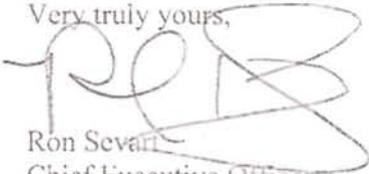
| 18

#### D. Conclusion

Once again, we thank you for the opportunity to comment on the Draft EIS. To summarize, we are not "no growth" advocates. We do, however, believe that any future growth must occur consistent with our community's long-held policies on urban form and must be accomplished in a way that preserves the prominence of the Space Needle as our city's premiere landmark. Specifically, any preferred alternative must be consistent with long-established policies that step down to meet the lower height limits of the shoreline zone. Alternatives must not wall off Lake Union, local parks, neighborhoods or the Space Needle.

| 19

We would like to be included on all future mailing lists and be kept apprised of all public meetings and hearings on this matter. As you can see from this letter, we consider it a matter of vital importance to the future of the Space Needle.

Very truly yours,  
  
Ron Sevan  
Chief Executive Officer

cc: Mayor  
Seattle City Councilmembers  
Lynn Claudon, Lynn Claudon Consulting

King, Donna

**From:** Jeff Sharp [sharpjds@gmail.com]  
**Sent:** Sunday, April 10, 2011 11:20 PM  
**To:** DPD\_Planning\_Division  
**Subject:** Comments - SLU draft EIS

To Whom it May Concern –

I am writing in support of greater height and density in the South Lake Union neighborhood as laid out in the draft EIS submitted to the city. I believe height and density offer the greatest benefits not only to the city but to the greater western Washington region.

I came to Seattle in the early 1980s to study architecture and urban planning and have been involved in countless projects in the western United States. I have seen great successes as well as run of the mill, average projects. To really work well, planning policy needs to provide a comprehensive framework that will create the right environment for good development. The zoning changes that allowed the resurgence in Belltown in the late 1980s had potential but ultimately did not succeed. While economic growth has stalled, it will recover at some point. Where do we want that growth to occur? When applied appropriately height and density increases can provide many advantages from an urban planning perspective. Among them are:

1. **Transportation.** Greater density near the downtown core allows more options for transportation including access to multiple modes (walking, biking, street car, bus, light rail) all without getting into your car and turning the key. With petroleum prices on the rise once again, it would be foolish to push the next phase of growth to the suburbs and beyond.
2. **Infrastructure.** The dot com boom/bust was certainly dramatic but remember, with all the torn up streets, there was a huge amount of fiber and other infrastructure installed. Greater density, both residential and commercial, will be able to leverage these existing assets and spark economic growth. Infrastructure is expensive, but when installed in dense settings it provides much more capacity to more people for less cost than the corresponding rural scenario. Think about it. Lay fiber, sewer and power down one city block and you can provide services for what – 1,00 residences? How many miles of pipe and conduit would have to be laid in half acre suburban zoning? For five acre rural zoning? In these economic times, it would be foolish to encourage wasteful growth in suburban and rural areas (Not only is it more expensive per capita, but it encourages sprawl and results in destruction of rural areas. Pretty soon, we'll have asphalt covering most of western Washington). The bonus of course is that much of this infrastructure already exists in the urban core and is ready to be put to use.
3. **Energy Efficiency.** Multifamily dwellings and concentrated business cores are inherently more energy efficient both in terms of first cost and life cycle cost. Why would we want to build more structures in suburban and rural areas that will be less efficient and consume precious energy resources? How many acres of rural western Washington do we need to destroy before we understand the mistakes we've already made? Gas is once again approaching \$4.00 a gallon. Density is the more energy efficient option and height is the key to density.
4. **Quality of Life.** When I first moved to Seattle my friends and I would often joke about the carpets being rolled up at 8:00 PM in downtown. After 10 to 15 years, there was finally some new housing in Belltown, but things were still pretty sleepy. Ever go on a trip to truly vibrant city? Manhattan, Rome, London, Los Angeles? Seattle Eh....not so much. South Lake Union is already making an impact. I worked in the area for about six years. At first, there was very little pedestrian activity during the day (never mind the evenings). Gradually – with projects like Whole Foods, Tommy Bahama, the improvements at South Lake Union Park, the street car – the neighborhood started to come to life. These development efforts were different than what took place in the Regrade. Belltown's resurgence was based on bulky, massive buildings that had little connection to the streets – not a lot of retail, not much in the way of nightlife beyond a few dance clubs, not much in terms of amenities like grocery stores, hardware stores and other services to meet day-today needs. In contrast what has taken place in South

Lake Union is a more organic growth of services, businesses, transportation options, night life and just generally a more livable environment. It's fun to walk down the streets, people watch, figure out where you can buy what you need, find the services that support your life. It's a great start and the city needs to support even more innovation. I believe that greater height and density is part of the answer.

In conclusion, the city has an opportunity to be truly courageous and innovative. Please don't repeat the milquetoast approach that doomed the redevelopment of Belltown. There was such great promise and it came close, but the result was way short of its potential. Look to the great, vibrant cities of the world for your direction. Look at New York, Rome, Los Angeles, Vancouver BC – there are many examples. These are inspiring cities that are full of life, full of color and character. Density and height play a role in all of these environments. The alternative is a middle of the road approach that misses a great opportunity. When I first moved to Seattle, transportation was a huge issue. Now more than thirty years later we're still talking about transportation and barely moving the ball forward. Take a bold step here and reach for something really great that has so many positive benefits – transportation, economic growth, vibrancy, creating a real heart and soul identity. Not to mention preserving a lot more rural space in western Washington.

Come on – you can do it! Don't be afraid of height and density – it is key to many of the questions of how to continue to grow and support a thriving Seattle for years to come!

Thanks - Jeff Sharp

**Holmes, Jim**

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**From:** Stephanie Shushan  
**Sent:** Monday, April 11, 2011 7:54 PM  
**To:** DPD\_Planning\_Division  
**Subject:** South lake union development

Hello:

I totally support development in the South Lake Union area, however I think that height restrictions should stay close to the 65 foot range. I think that keeping lower restrictions will keep the character of the area as a more open space in the city. Additionally, I think that many of the excessively tall buildings in the downtown are an eye sore. Many of these buildings are still unused and I hate walking by the empty buildings/store fronts that still remain since the buildings were completed. | 1

Stephanie



307 Westlake Ave North  
Suite 300  
Seattle, WA  
Tel: 206-262-5500  
Fax: 206-262-5599

April 6, 2011

City of Seattle  
Department of Planning and Development  
700 Fifth Ave, Suite 2000  
Seattle, WA 98124-4019

Dear Mr. Holmes,

VLST Corporation is a privately held biotechnology company dedicated to the streamlined discovery and development of novel therapeutics for the treatment of inflammatory and autoimmune disorders. We are located in South Lake Union and hope to remain there for years to come.

We have noticed that the EIS for the South Lake Union rezone contemplates maximum office floorplates of 24,000SF. This seems a little on the small side given the programmatic needs of many biotechnology companies today. The need for efficiency in ventilation and space planning as well as interdisciplinary collaboration groups tends to push ideal floor-plate size into the 30,000-35,000SF range. Given how many biotech companies have clustered (and continue to cluster) in the South Lake Union neighborhood, it seems that it would be important to preserve the possibility of new buildings with these larger floor plates.

It seems useful then to study an option in the final EIS that corresponds to larger floor plates in the 35,000SF range in order to preserve the possibility of zoning that best accommodates the programmatic needs of our large and vibrant biotechnology community.

Sincerely,

A handwritten signature in black ink that reads "Martin A. Simonetti". The signature is written in a cursive, flowing style.

Martin Simonetti,  
CEO & President  
VLST Corporation  
307 Westlake Ave N, Suite 300  
Seattle, WA 98109

Charles Sleicher

116 Fairview Ave. N. # 310, Seattle, WA 98109  
charles@sleicher.net

tel 206-254-1576

4-9-2011

Seattle Department of Planning and Development (PDP)  
Attn: Jim Holmes  
700 Fifth Avenue, Suite 1900  
PO Box 34019  
Seattle, WA 98124

I am a resident of South Lake Union, where I live and work full time, and wish to express my strong opposition to most of the proposals for the rezoning of South Lake Union. I would like to make three points.

1

First, the rezoning options 1 and 2, and possibly 3 as well, would be aesthetically disastrous. To wall off the area anywhere near the shoreline with building rising some 100 or more above ground would make the area ugly when seen from any angle. It would also cause Seattle to be viewed nationwide as an example of how not to develop a waterfront area. I think other cities would react with scorn and incredulity that the Seattle DPD would permit such an outrage. (Remember the outrage when Park Shore was built on the shore of Lake Washington?)

2

Second, the increased density of living in SLU from rezoning will make the area far less desirable as a place to live and work. I know that some proponents claim that the increased population density would increase "livability," but those statements should be discounted because most of them are made by outsiders who will continue to live in their suburban homes with lots of greenery and low population density. The suggestion that 21,000 new households would live in SLU is a nightmare! Crowded open areas and streets are no one's idea of livability. Just think of what such numbers would mean to South Lake Union Park, the only significant park in the area.

3

Third, to the best of my knowledge, all of the proponents of the proposed rezoning (1) work and live outside of the area and (2) plan to gain financially from the rezoning, some of them by multiple millions of dollars. I resent this opportunistic intrusion by outsiders and their exploitation of SLU; they are carpetbaggers who want to gain at the expensive of those of us who actually live in SLU.

4

I know, of course, that many people in DPD have worked long and hard to bring rezoning to SLU, for which they should be appreciated and honored, but that should not be reason to actually carry out the proposed rezoning.

4 cont

Sincerely,



Charles Sleicher

Holmes, Jim

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From: Smith Don [mailto: ]  
Sent: Wednesday, April 06, 2011 3:47 PM  
To: DPD\_Planning\_Division  
Subject: SLU Height and Density Rezoning Plan

I am a resident of the South Lake Union area and, like most of my neighbors, I am discouraged about our future. The prevailing sentiment is that, once again, the big money (Vulcan) will prevail and win the extreme building heights of Alternative One. It may be hopeless, but I will at least raise my voice and try to be heard over the loud, well-organized, well-financed clamor of Vulcan and the other commercial property owners -- who do not LIVE here, and whose only interest is to squeeze the maximum profit from their properties.

As much as we worry about losing our sense of community and the livable scale of our surroundings, it is even more critical to preserve the visibility and accessibility of Lake Union. Alternatives Three and Four are the only choices that allow for heights that step down to the lake, and low heights along the lake front. Lake Union is a treasure that should be enjoyed and appreciated by all -- not just by the wealthy occupants of high-rise condos and offices.

The current height limits of Alternative Four are sufficient to allow the growth and density that has been mandated. However, since an increase in building height limits seems inevitable, please choose the more reasonable Alternative Three.

Thank you for your consideration,

Patricia Smith

**Holmes, Jim**

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**From:** Noelle Smithhart  
**Sent:** Monday, April 11, 2011 4:51 PM  
**To:** DPD\_Planning\_Division  
**Subject:** Draft EIS Comment

**RE: South Lake Union Draft Environmental Impact Statement**

To Whom It Concerns:

This is what I read at the Public Hearing. Due to time constraints, a few sentences were not included, so I am submitting this in writing:

*My name is Noelle Smithhart. I live in South Lake Union and I've worked here for Vulcan for about 6 years. I also sit on the South Lake Union Chamber of Commerce Board of Directors. This comment is from my personal point of view.*

*I was born in Seattle, and I grew up in unincorporated King County, near Covington, WA. I moved into the city 13 years ago. In my youth, I experienced the epitome of suburban sprawl – watching chain stores move into strip malls, encouraging a culture reliant on the use of single occupancy vehicles. Since moving to South Lake Union over 2 years ago, I've gotten rid of my car.*

*I'm a huge supporter of smart growth and I fundamentally believe in density. I walk the walk, literally, and I'm thankful the city is studying the impact of increasing density in my neighborhood. I moved here specifically for the vibrancy and vision of the stakeholders for this urban center. I experience the increased activity and a growing sense of community daily. I do wish the city would also look at the benefits to the local economy and environment that is brought by offering more opportunities to live, work and play in our urban neighborhood.*

*I'm aware of a small group of residents who don't fully share this vision of increased capacity, but they are not a voice for all residents. When I chat with folks around the neighborhood about increased height and density in SLU, it's a no-brainer. We're an urban center, and this is where height should go. We moved here for this reason. More people living and working in my neighborhood will support small, local businesses and arts and cultural events.*

*I'm personally very excited about seeing more diversity in the forms of buildings in my back yard. I eagerly anticipate taller buildings with great design. As the city adopts progressive new zoning, I also hope they will consider developing and adopting new design guidelines for South Lake Union. These will help to both maintain and enhance our built environment. Increased height offers more flexibility and ways to incorporate great plazas and opens spaces into building design. I also hope the city will consider appointing a Design Review Board more specific to South Lake Union. We are currently part of the Queen Anne and Magnolia district, and I believe that SLU has a different aesthetic and future than these neighborhoods. It might make sense to also be in the same Design Review district as Uptown, another Urban Center.*

*I love my neighborhood and I eagerly anticipate new zoning that encourages more people in South Lake Union.*

**King, Donna**

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**From:** Paul Snorsky [SnorskyP@hswc.com]  
**Sent:** Friday, April 08, 2011 4:40 PM  
**To:** DPD\_Planning\_Division  
**Subject:** South Lake Union Draft EIS

To whom it may concern:

I am writing as an interested party with regard to the Draft EIS for potential re-zoning to increase densification of the South Lake Union (SLU) neighborhood. After reviewing the EIS I'd like to voice my support of the densification alternatives. I have worked in the South Lake Union neighborhood for 15 years, I live on the North side of lake union and look across the lake at SLU and I frequently visit the neighborhood with my family for activities other than work. I used to frequently travel through SLU as a kid (I grew up in Seattle) when going to Sonics games and going to the Seattle Center.

The changes made in recent years have improved the quality of life tremendously in this neighborhood. It is beginning to develop an identity that is positive for our community. I remember as a kid being afraid to stop at the Denny's on Mercer after ball games because the neighborhood was scary. Now I take my own kids to REI, restaurants and parks in the neighborhood frequently.

After seeing this identity begin to develop and a resulting cleanup of the neighborhood occur, I am convinced that further densification of the area will only increase the positive effects. Additionally, after scanning the EIS, I didn't see any environmental impacts that outweigh what I feel would be the positive impacts. Thank you for your consideration in this manner.

**Paul Snorsky**

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**Holmes, Jim**

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**From:** Scott Starr SMR  
**Sent:** Monday, April 11, 2011 4:52 PM  
**To:** DPD\_Planning\_Division  
**Subject:** South Lake Union

I would like to write in support of increased density in South Lake Union neighborhood. I believe that increased density in Urban areas will help to control sprawl in the suburbs and help to preserve our farmland and natural habitat. A taller residential building could accommodate an entire subdivision's worth of housing, preserving acres of undeveloped land. Increased development in the city should also help to reduce the cost of housing in the region by increasing the supply of housing and reducing pricing pressure on single family housing. A denser, mixed use neighborhood should also help to reduce traffic congestion, gasoline usage and wear and tear on our road infrastructure by locating jobs in close proximity to new housing.

I personally do not think that taller buildings are an aesthetic concern when they are located in a downtown neighborhood like South Lake Union. Aesthetic impacts from taller buildings could be mitigated through thoughtful zoning - perhaps lot coverage could be limited over a certain height to preserve views similar to what was done in Vancouver BC. Developers could also partner with the city to improve public infrastructure, provide public parks and add affordable housing to the neighborhood. Incentive zoning could be used to encourage developers to provide those needed public benefits.

South Lake Union has been transformed into a vibrant neighborhood by the new development in the area. I am continually surprised by how many people are walking on the streets during the day and at night. I think that new development will only add to the vibrancy of the neighborhood.

**Scott Starr**

**Holmes, Jim**

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**From:** Josh Stepherson [mailto:jstepherson@seattle.gov]  
**Sent:** Tuesday, March 29, 2011 5:37 PM  
**To:** DPD\_Planning\_Division  
**Subject:** comment eis

To whom it may concern,

My name is Josh Stepherson. I am writing as a Seattle citizen and small business owner with an office located in the South Lake Union area.

I am writing in regards to the city of Seattle's Draft Environmental Impact Statement.

I would like to make several comments:

- This area is a designated Urban Center that is targeted to receive a significant percentage of the city of Seattle's overall growth and density. The present zoning (no change option) was put in place prior to this zoning change and does not help to encourage the creation of a true mixed use Urban Center that meets our regional and city growth goals.
- Any zoning recommendation and change should increase building capacity and provide developers with sufficient flexibility to create a diverse range of housing, commercial and retail spaces.
- Retail spaces – consider expanding retail zoning on 8<sup>th</sup> Avenue and Fairview. It should not just be at corners.
- More transit and basic infrastructure will be needed to support this Urban Center
- Ensure that the new zoning encourages more and a broader mix of residential
- Protect the view corridors, especially the view to the north from Valley Street

In looking at the options and the significant role this area will have in creating jobs and providing housing I am in support of alternative 1. It does the most to advance our collective goals for the area.

I look forward to continuing to stay involved in this process and supporting city efforts to create a great SLU neighborhood.

Josh Stepherson

**Holmes, Jim**

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**From:** Mark Stoner  
**Sent:** Thursday, April 07, 2011 5:47 PM  
**To:** Holmes, Jim  
**Subject:** South Lake Union EIS Comment

I would like to submit the following comment on the South Lake Union EIS:

I fully support Alternative 1 and all of the greatest potential increases in height and density that come with it. The current zoning in South Lake Union is woefully inadequate for utilizing the future potential of the neighborhood. Among the city's most underdeveloped neighborhoods, South Lake Union is the closest to Downtown and Capitol Hill and has the best transportation connections. To waste the opportunity of this neighborhood on 65' and 85' buildings is a crime against the future of the city. Seattle's planners realized in the late Nineteenth Century that Downtown should expand towards Lake Union, and they went to the trouble to raze and entire hill to make sure that would happen. Now, over a hundred years later, Seattle's zoning code is preventing that expansion from happening appropriately. It is much more preferable to concentrate as much of the city's population and job growth close to downtown rather than in far-flung areas of the city, as this will be the most sustainable approach in terms of energy use, transportation access, and quality of life. Allowing Alternative 1 to become law does more than the other alternatives to make Seattle a sustainable city.

Mark Stoner

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Holmes, Jim

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**From:** David Sullivan [mailto:dsullivan@panpac.com]  
**Sent:** Monday, April 11, 2011 4:18 PM  
**To:** DPD\_Planning\_Division  
**Cc:** David Sullivan  
**Subject:** South Lake Union - EIS Comments

**Importance:** High

Dear Mr. Holmes,

I am the General Manager of the Pan Pacific Hotel located at the corner of Denny and Westlake in South Lake Union. The purpose of this e-mail is to formally give my support to the proposed Alternative 1 in the "Height and Density Environmental Impact Statement".

The Pan Pacific Hotel Seattle opened just over 4 years ago. While we are very excited to be a part of one of the fastest growing and most dynamic neighborhoods in the country, the entire neighborhood still suffers from a lack of density that would make our hotel and other local businesses successful. The truth is that even though we have some big name corporations moving into the neighborhood, we still need to attract and develop the residential component to balance out the area. With more residents also comes more amenities in the form of restaurants, service providers and night life. All of this together will make South Lake Union a much more desirable place to live and work as well as a more profitable area to do business.

At first, I was concerned that high-rises would obstruct the view from our hotel guest rooms. I now understand that the intent is to develop tall, thin buildings with plenty of space in between allowing for continued open views. The buildings in fact will not restrict the view as much as they will "become part of the view".

Being a native of Vancouver, BC I witnessed this very transformation first-hand when the decision was made to allow more height in the old warehouse district of "Yale Town". What was once the most run down part of town has become the most sought after area of downtown Vancouver. The buildings have added beautifully to the Vancouver skyline and the numerous new restaurants, bars and retailers have added a completely dynamic new feel and electricity to a once undesirable area. Simply put, the decision "to go up" in Yale Town totally transformed a derelict neighborhood into the envy of the city. There are incredible similarities between South Lake Union and Yale Town and I see no reason why a similar decision here won't deliver the same results.

I am also concerned that if we don't continue to develop and grow South Lake Union with a strategic plan for density, then that development will just go somewhere else. In our case, that "somewhere else" will likely be Bellevue.

As a business operator in South Lake Union I am very excited for this zoning change to take place. The sooner, the better.

Thank you very much for your time.

Sincerely,

David

**David Sullivan | General Manager**  
[panpacific.com/seattle](http://panpacific.com/seattle) | [panpacificseattletour.com](http://panpacificseattletour.com)

Holmes, Jim

From: Scott Surdyke [mailto:scott@slu.com]  
 Sent: Monday, April 11, 2011 11:30 AM  
 To: Holmes, Jim  
 Subject: SLU Comments

Below are my comments on the SLU Plan, and the recent presentation:

With very limited land in Seattle, it only makes sense to go up.. I am for the height increase proposed in Alternative 1, however I have some concerns about the scope of the EIS and the product it will encourage.

- **Tremendous Benefit:** Note that such a substantial height increase will give tremendous financial benefit (value) for current property owners and developers. In exchange for the City "giving" this benefit, there should be some substantial public benefits, including:

- **Sustainable Development:** Minimum of LEED Silver. It doesn't make sense to argue that this upzone is a "sustainable" thing to do unless the City and developers work together to ensure that the new towers in this built environment will be state of the art, innovative and sustainable development.
- **Public Open Space:** What makes Vancouver BC so livable is that developers provided **A NETWORK OF NEW, PUBLICALLY ACCESSIBLE OPEN SPACE** at the base and adjacent to their projects. The EIS's assessment that SLU already has more than enough open space "per person" does little to encourage or incentivize developers to provide any landscaped space at the base of the buildings (publically accessible). This will merely encourage full-block development with "privatized" open space on rooftop decks. Considering that the neighborhood population could easily rise by more than 10,000 , the argument that SLU already has enough open spaces seems like a weak one and is out of touch with the reality of what makes a downtown neighborhood livable (see the examples in Portland and Vancouver).
- **Design/Architecture quality:** The property owners and developers who stand to gain the most from this up-zone should be held to a higher standard of development than what is allowed under typical design review. The incorporation of sustainable elements, masonry and plenty of glass should form a newer, higher standard of development than what is typically built in Seattle's urban centers.

- **Land Use/Building Code Changes:**

- **Ground Floor Residential Should be allowed outright:** We don't need another Belltown, where too much ground floor commercial has resulted in decades of street level vacancies. Developers of SLU should be able to opt for real ground floor residential (townhomes), without having to do this under the guise of "live/work." Again, what makes downtown Vancouver and Portland's Pearl District so livable is that there are actual homeowners right at street level. These townhomes provide 24-hour "eyes on the street" and really encourage community and a real neighborhood feel. Let the market decide what uses can work on the ground floor, and give the developers flexibility to do live-work and townhomes instead of endless strips of linear commercial/retail.
- **Make a real effort to LISTEN to developer and architects who have code recommendations to make high-rise construction more cost and energy efficient:** A new high-rise condo shouldn't have to cost

\$1000 a foot to purchase. Unfortunately the City of Seattle's obsession with energy codes and reluctance in relaxing some of the energy restrictions have made our city one of the most expensive to build in on the West Coast. High-rise architects and other design subs for years have pointed to Vancouver and Portland's high-rise building codes, which allow more flexibility in overall energy code and performance. This translates in buildings that are cheaper to build, and include more glass on the exterior (which is more desirable to owners, and frankly more attractive). If the City is going to make such a sweeping upzone, then perhaps it's time to consider what code changes could be incorporated or changed that make more sense from both a design and financial standpoint. Really listen to builders, architects and developers regarding what changes could be made to support rather than hinder the development of high rises.

4  
cont

- **Other areas in the Shoreline environment:** If the City is going to allow such a substantial change on a former industrial/commercial area so close to the waterfront, then perhaps it's time to take a more "updated approach" to land use planning in similar areas such as north Lake Union (Fremont, Wallingford, Eastlake, etc), Interbay and Pier 90/91. If there are low rise, non water-dependent uses in other areas that are sitting vacant or that are underutilized, then perhaps it's pertinent to examine these areas as well (as a separate scope). Why should a developer who wants to build a mixed use development near a marina get "shot down" by DPD just because he or she is planning a mix of uses and increases of heights? Other neighborhoods have been deprived of open space and the opportunity to enjoy areas near the shoreline. It only makes sense to really look at opportunities (like SLU) where water-dependent uses are prioritized within the shoreline, but then allowing mixes of commercial, retail, residential, open space and industrial to concentrate. This will ensure consistent and vibrant shoreline neighborhoods, and will provide flexibility as the market changes.

5

Scott Surdyke,  
Seattle, WA

**Holmes, Jim**

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**From:** Allen and Joanne Suver  
**Sent:** Monday, April 11, 2011 5:19 PM  
**To:** DPD\_Planning\_Division  
**Subject:** EISI

If I understand correctly, your responsibility is to submit options for the development of South Lake Union. I urge you, implore you, to be aware of the tremendous power you have to shape this decision. | 1

Lake Union should be framed as a natural treasure. Don't choke the life out of the environment with a dense forest of hard-edged concrete and glass buildings. Think how impoverished our whole country would be without our national parks. Lake Union needs to be looked at with the same wisdom and vision.

I understand South Lake Union is an extension of downtown Seattle and development is realistic, but don't sell out for short-term gains.

Joanne Suver

Holmes, Jim

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**From:** Drew Symonds  
**Sent:** Monday, April 11, 2011 11:30 AM  
**To:** DPD\_Planning\_Division  
**Subject:** SLU EIS

I currently work in downtown Seattle and live in Woodinville, but plan to move to South Lake Union this summer. I have also been spending more time in the area with the new park and different shops and restaurants that are now open, which I usually get to by the streetcar. I was attracted to South Lake Union as a place to live because it will finally allow me to walk or take transit to work, and because it is becoming more active during both the day and night as more workers and residents move to the neighborhood. I would like to see increased heights that allow even more activity and people in South Lake Union because it helps make the area safer, supports the local retail businesses and provides more housing options for people in the downtown core so that they can get to work or recreation by walking, biking or transit. Seattle is a world-class city that will only continue to attract more people from all over the globe, and we need taller, aesthetically pleasing buildings in areas that make sense such as South Lake Union where we have the capacity to accommodate growth. For those reasons, I support the option/alternative that allows for the tallest building heights in the South Lake Union urban center. 1

Drew Symonds

Holmes, Jim

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**From:** john tangen  
**Sent:** Thursday, April 07, 2011 1:24 PM  
**To:** DPD\_Planning\_Division  
**Subject:** South Lake Union

To Seattle Department of Planning and Development  
Attn. James Holmes

Dear James, I was born & raised in West Seattle a long time ago. Back when the Smith Tower was the tallest building in the city skyline. I'm sure there was more than a few people who would have liked to keep it the tallest but that didn't happen. We are now building in South Lake Union & taller would be better. We will continue to attract Hi Tech & Bio Tech companies which means more construction jobs, more local long term jobs & increased tax revenue. This also means more people living in the area. At a time when the trend is to move back to the city taller buildings mean more housing options. Please give careful thought to any new developments in South Lake Union & do what's best for Seattle.

Thank you, John Tangen

Holmes, Jim

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**From:** Michelle Thordarson  
**Sent:** Friday, April 08, 2011 8:42 AM  
**To:** DPD\_Planning\_Division  
**Subject:** SLU Rezone Comments

I work in Seattle and also enjoy coming into the city to spend time with friends and family to enjoy the culture and dining experiences that Seattle has to offer. I support additional height and density zoning in the South Lake Union neighborhood. By increasing building heights in South Lake Union, we can reduce the spread of building into rural areas and cities nearby. Commuting traffic into Seattle is already horrible; it would make better sense to increase the density in the city and encourage people to live close to their jobs. Creating jobs and housing along existing transit routes makes sense. This would also allow more people to support small, locally owned businesses, as well as the local artists and theaters. Growth in Seattle is going to continue. I would strongly urge our elected officials to plan appropriately for the anticipated growth now.

Regards,

Michelle Thordarson

Holmes, Jim

From: Diana Timpson  
Sent: Monday, April 11, 2011 11:02 PM  
To: Holmes, Jim; DPD\_Planning\_Division  
Subject: 2011-04-11 Timpson comments SLU EIS

SLU EIS

Dear Sirs,

The following are my comments on the "South Lake Union Height and Density Alternatives" Draft EIS dated February 2011. The comments are general in nature, and not in a particular order. Also, though I have experience in the design and construction, the comments represent a personal point of view.

The rezoning of this neighborhood must be one of the greatest opportunities anywhere in the US right now to change the face of a world-class city. It needs rezoning to increase its potential. As a neighborhood it is unique and should be treated so. It is not a blank slate, and should retain some of its character and heritage. 1

As an initial statement on cars and traffic: there will likely be plenty of public opinion on vehicle access and traffic issues due to simply the Mercer project, and adding density to the neighborhood will obviously exacerbate traffic. In my opinion living in a higher density area requires sacrifices in order to create that density. Increased density should by definition absolutely discourage personal vehicle use, especially for commuters. If public transit is not an option, then changes need to occur: but that should not affect the rezoning if this neighborhood. That is an issue for all jurisdictions within a commutable distance to Seattle. 2

Increasing height limits does not necessarily equal density. There are cities that have high densities that are not associated with tall buildings. Taller buildings do not equate to affordable housing - residential towers are much more costly for developers and are typically high end condos. 3

Incentive zoning seems to be very dependent on the economic climate and real estate proformas, which may leave too much beyond the city's control. The incentives should include options that greatly benefit the public, and enhance the streetscape and long-term aesthetics of an urban center. The bulk and shadow mitigation measures listed early in the report should be taken to a specific level of detail within a rezoning proposal. 4

As one example, the concept of POPS is great: as long as they are actually something that the public would feel invited into and would want to access and use. The pass-through at UW III fails to do either. This space should not have created any incentives to the developers. There is nothing there for the public except the feeling that you're not supposed to be there and probably someone is watching.

The mixed use zoning is troublesome. Being so close to downtown with lower land value will encourage commercial development. The opposite is true for residential development in a city core. The city may want to consider more detailed zoning even to a block by block basis, to ensure the mixed use that will continue to enliven SLU in the evenings and weekends. The alternative may be a series of 'office parks' that leave the neighborhood dead during non-business hours. This would be poor use of a neighborhood that is part of the city core - and dining establishments, retail, and cultural activities are encouraged by the local population of residents. The city currently has the opportunity to create a vibrant neighborhood, and not leave it up to economics and zoning incentives.

5

The possibility of a sea of 85 foot office park developments across SLU should be a serious concern.

6

If there is to be substantial growth in residents in SLU, more family oriented amenities need to be included in planning, such as schools, parks, wider sidewalks, green streets with traffic slowing, pedestrian crossing yield areas, overall pedestrian and bike oriented design of streets, areas for public activities, or other special zoning. Seattle needs downtown core parks, and there are not many places left to do this.

7

Podium heights of 40 ft do not create a welcoming city street. Any setback for a tower above this height podium would not be obvious from the street. An 85 ft podium does nothing for the street level, and a setback would not make much difference unless you are in the adjacent 95 ft building. Podium heights above 20 ft will not serve the neighborhood.

8

A good example of a well thought out development with respect to activating the street level (in my opinion) is the block at Whole Foods. The sidewalk is substantially widened, a wide set of steps and covered escalator serve to bring the public up to a plaza with restaurants, boutique shops and the hotel. The towers are unimposing to the pedestrian, leaving sunshine and blue sky visible from wherever you are standing. Except from Denny, with it's bus stop and loud hot vent out of Whole Foods. It is unfortunate there is short term parking up there, beyond accessible and hotel / restaurant drop off, when there is parking below grade. But it has created a nice public amenity.

9

The increased heights (very generally) seem to step down from Denny to the lakefront. The potential for towers in the last block before the lake is not very well thought out. The rendering on the cover of the document (which is as far as many would get in this report) should not show the current view from SLU park to the highrises back at Denny. This rendering, if any of the renderings in the entire report do, should realistically show the option with the biggest impacts, unless the impacts of all four options are shown. There is no point including a photo of what the current view is without a side by side comparison of the proposals. The development of these blocks is going to have a powerful effect on pedestrians in the experience of both getting to and being in the park.

10

The renderings of views up Mercer and Valley each show the towers on the opposite side of the street view. Neither show the actual effects of the towers being on the street side of the block. A fair number of renderings appear to be misleading throughout the report. Podium heights, overall heights, setback distances, and floor plate dimensions are unclear. I understand professionally the

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effort required to produce renderings for multiple rezoning scenarios from various vantage points. | 11  
 cont

I believe that the allowable podium heights and the actual effects and visibility of various setback conditions should be a serious concern to the city. | 12

If the EIS is serving the public, it should be clear to the point of being blunt in its representations of potential development. These visual renderings are the limit of what the majority of report readers are going to be able to digest. I am not entirely opposed to raising heights closer to the lake, but these blocks should be treated very sensitively. | 13

The “mitigation strategies” for height and bulk should be a big concern for the future of this neighborhood, and closely defined in any rezoning decision. | 14

A 30 story building will clearly need to have parking to be feasible to a developer. The water table just below the surface (notably lakeside, but throughout the neighborhood as you approach the lake) would create huge and possibly untenable expenses to develop a parcel with underground parking. This is downplayed in the soils chapter. The logical step for a developer is parking above grade. I strongly believe there should be no parking above grade in a new structure allowed under the new zoning. It destroys street character. | 15

Parking at or above grade in the re-zoned SLU could have strong detrimental effects on the future vibrancy of this neighborhood.

General questions on the soils section of the report:

The water table is just a few feet below grade at the lakefront. Soils on the lakefront blocks are subject to liquefaction. | 16

How much will relative costs between building high rise on liquefaction-prone soils vs good soils affect developers decisions?

Likewise, the relative cost between building a high rise with 2+ levels below grade parking without water table issues and tower with water 10 ft below grade will affect the type of development. | 17

The report mentions “permanent dewatering”, which I don't know about. Is this required and or feasible when your garage is well below the water table? Relative costs in a building life cycle? | 18

Report talks about possible “changes to native soil conditions.” It seems pretty obvious this will occur whenever there is high rise construction. Why do we care?

Is this a matter of changes to groundwater flow? Are changes to groundwater flow possible to mitigate with any certainty, or may have unknown / detrimental consequences?

These questions need to be taken into consideration where height increases are being considered – a developer may opt to build lower and forgo setbacks or any other incentives.

I believe in increased heights in the neighborhood. It is so close to downtown, and should be dense. Upon the (inevitable) economic rebound, which will likely be occurring right around the time final rezoning proposals may be under review, we should be concerned about a development "rush" that is unsustainable in the short term, and might drain Downtown, Belltown, Lower Queen Anne of their vitality. Belltown for one is very clearly on the decline, and we have seen businesses running to SLU.

I like to call SLU "Sim City." It's as if we all have the opportunity to build a whole urban area exactly as we have envisioned it.

Thank you for your time and consideration.

Sincerely,  
E. Diana Timpson  
PE, Structural Engineer, owner at Veer Lofts

Diana

Your \$20 Donation will bring clean water for life to one deserving person who needs it.

<http://www.firstgiving.com/fundraiser/diana-timpson/wilde-foundation>

Holmes, Jim

**From:** Steve Trainer  
**Sent:** Monday, April 11, 2011 2:09 PM  
**To:** DPD\_Planning\_Division; Holmes, Jim; Sugimura, Diane; Conlin, Richard; Rasmussen, Tom; Bagshaw, Sally; Burgess, Tim; Godden, Jean; Clark, Sally; Licata, Nick; Harrell, Bruce; McGinn, Michael Patrick  
**Subject:** South Lake Union Draft EIS Comment Letter

In response to the draft environmental impact statement (EIS) recently published by the City of Seattle and as an owner of property in South Lake Union, I am writing to support greater height and density within the South Lake Union (SLU) neighborhood. People are essential to an interesting, vibrant, and safe neighborhood. Through channeling growth to urban centers, we are able to preserve rural areas and reduce pressure on industrial land. South Lake Union is perfectly poised to accommodate such growth, with the right zoning. Increased height and density will allow more people to locate to this urban center. 1

Additionally, increased height and density creates more ongoing revenue for the City of Seattle, maximizes the return on the investment the City has already made in the neighborhood, and allows the City to serve citizens at a relatively low cost to taxpayers. South Lake Union is a growing hub of life science, technology and global health organizations that are changing the world. These organizations are drawn to urban centers like SLU because they encourage collaboration and innovation. The ability to continue to recruit talented people to these organizations, and newly created ones, is critical to our economic future.

Alternative One provides for the greatest density in South Lake Union; the City should adopt it provided it is willing to address the following revisions:

- A limitation on floorplate size above the podium level limits a building's appeal to potential commercial tenants. Currently commercial tenants are pursuing building floorplates that approximate 40,000 s.f.. This limitation will severely impact buildings' ability to attract long-term, viable tenants. 2
- All of the proposed alternatives are essentially a downzone; currently the zoning is SM 85'. Alternatives 1-2 (the alternatives with the highest density) downzone the base height to 20 feet and require extensive bonus payments to develop above this base. Base heights should either be raised or kept the same (85) feet to ensure that the result is not a downzone. 3
- The height limit on 8<sup>th</sup> Avenue for commercial development will prevent the logical expansion of important users in the emerging biotech, global health and life sciences industries. 4
- It appears that the alternatives and the urban design framework foresee the 8<sup>th</sup> Avenue corridor as a residential-type street. As an owner of property along 8<sup>th</sup> Avenue, I do not support a residential-focus on this street. Instead, the focus should be on a mix of uses, including viable large commercial tenants that can sustain the type of jobs/housing balance the SLU neighborhood plan foresees in the neighborhood. 5
- A "Woonerf" along 8<sup>th</sup> Avenue restricts access for successful retail tenants (which are encouraged along 8<sup>th</sup> Ave). Retail tenants require a certain amount of vehicular and "outside of the neighborhood" traffic; limiting 8<sup>th</sup> Avenue to a neighborhood focused street will not help create the type of retail environment the City is envisioning. 6

Thank you,

**Steve Trainer**  
 Managing Member  
 9<sup>th</sup> Avenue Investors, LLC

**King, Donna**

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**From:** Beatrice Tung [tungbst@gmail.com]  
**Sent:** Saturday, April 09, 2011 12:00 AM  
**To:** DPD\_Planning\_Division  
**Subject:** EIS

Dear City Council Members;

The growth and development of South Lake Union is inevitable, so the new zoning law is necessary. But the new zoning changes should be fair and good for all SLU residents and businesses involved so that we won't create a dead zone, which not many of us will be able to see the blue sky, the surrounding mountains and the open water front. The zoning changes need a vision with careful thinking and planing.

More than 100 years ago, when Chicago lake front area was destroyed by fire, the city had the foresight to rebuild in a way to preserve the open lake front area for everyone. So I am strongly against the zoning alternative #1 and #2 just for the massive buildup. The monstrous commercial buildings and lofty residential towers will destroy the neighborhood. Now you have the chance and power to make SLU a desirable area for the future generation to treasure. When the Viaduct came down, the whole Seattle downtown included SLU will have most beautiful water front for everyone to enjoy.

Thank you!  
Beatrice Tung, the resident of SLU



325 Eastlake Avenue East  
PO Box 778  
Seattle, WA 98111-0778

April 11, 2011

Seattle Department of Planning and Development  
Attn: James Holmes  
700 Fifth Ave., Suite 1900  
P.O. Box 34019  
Seattle, WA 98124-4019

RE: South Lake Union Height and Density Alternatives Draft Environmental Impact Statement (EIS)

**I'm writing on behalf of PEMCO Insurance, which supports Alternative #1 from the EIS for the flexibility and greatest opportunities by allowing the highest and most-dense zoning changes.**

PEMCO Insurance and School Employees Credit Union of Washington are residents and land owners in the Cascade neighborhood of South Lake Union. We've been here since our founder, Robert J. Handy, built our first structure in 1949. Since then PEMCO has been continuously involved with the Cascade area, striving to be a good neighbor and help maintain and improve this community.

As a local company dedicated to Northwest residents, and a mutual company owned by our customers – not stockholders – we support Alternative #1 because it's in ours and our customers' best interests.

PEMCO partnered with other property owners in South Lake Union (SLU) to build Alley 24, a full-block mid-rise development that opened in February 2006 next to PEMCO and REI. It represents PEMCO's commitment to responsible, mixed-use development that provides office, retail, and market-rate rental housing. Sustainable resources and green building techniques were used, and historical structures such as the New Richmond Laundry building were incorporated into the design. The property also features four rooftop gardens for commercial and residential tenants to enjoy. Mid-block pathways divide the property for easy pedestrian access, and artwork and landscaping are incorporated throughout.

Alley 24 fits the description of what the Draft EIS recommends for all future development. However, Alley 24 was limited in height by current zoning limitations. Without the additional height and density that comes with it, it's been difficult for street-level shops and restaurants to survive. Additional people would help support these businesses and attract more new ones.

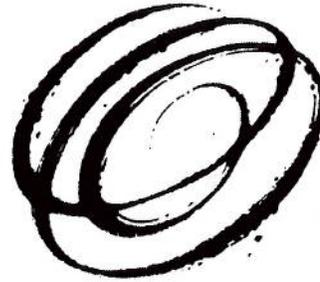
PEMCO has more than 600 employees who work, dine, shop, and play in this area every day, including some who now live in the Cascade area and are excited about the potential of SLU. Additional market-rate housing will increase the opportunities for PEMCO employees to live closer to work; more people living and working in the area will improve neighborhood safety, as well. With height and density come more shops, restaurants, parks, and culture that will entice our employees to stay and play in SLU after work, rather than immediately drive to their homes elsewhere. As SLU becomes more enjoyable, it also will entice prospective employees to apply at PEMCO.

Alternative #1 gives developers the flexibility needed to build structures that include the most public amenities, create the most jobs, and create housing for a mix of residents of all ages and incomes.

Sincerely,

John Turner  
Real Estate Facilities Manager  
PEMCO Insurance

# Memo



SEATTLE OPERA  
SPEIGHT JENKINS GENERAL DIRECTOR

**To:** South Lake Union Height & Density DEIS  
**From:** Kelly Tweeddale, Executive Director  
 1020 John Street, PO Box 9248  
 Seattle, WA 98109  
 206-676-5515  
**Date:** 4/11/2011  
**Re:** Comments for DEIS

Please accept this memo as comments in response to the South Lake Union Height and Density DEIS recently distributed. Seattle Opera administrative offices are located at 1020 John Street between Boren and Terry Avenue North and John and Thomas Streets. It has been a long-term tenant in the South Lake Union community since the early 1990s. The varied and complex nature of our business model which includes light industrial with access for load-in and load-out of trucks hauling a 40' to 53' trailers are essential to our ongoing operations and our ability to produce quality opera in our community. Our present location offers us appropriate access from the major transportation corridors of State Route 99 and I-5, an adequate turning radius for large scale trucks and trailers, and a Terry Avenue N. streetscape that is freight/light industrial friendly.

We want to reiterate the importance of retaining the current uses of Terry Avenue N. in any height and density changes that may occur as proposed in the alternatives in the Draft EIS. With the increase of density proposed in the EIS alternatives, we have concerns in the following areas: freight/trucking access, parking, safe pedestrian routes, and retaining the character of the mixed use neighborhood.

#### Freight/Trucking access:

The ability to find appropriate trucking corridors that are essential to a vibrant mixed use area. The EIS refers to several documents including (add them here) that describe the uses of Terry Avenue N. in somewhat conflicting terms. The South Lake Union/Uptown Triangle Mobility Plan recommends making Terry Avenue a pedestrian link to the South Lake Union Park. We recommend that the pedestrian improvements be focused north of Thomas Street, as the core of industrial use on Terry Avenue N. is between Denny Way and Thomas Street. In addition, the reference of Terry Avenue N. as a "festival" street in the South Lake Union Urban Design Framework released in December 2010 refers that the street design "needs to allow ways to close down to auto traffic, transforming from road to open space." Again, this would be detrimental to allowing for the current Seattle Opera use unless it was restricted to Terry Avenue N. from Thomas Street north. The recommendation of curbed sidewalks on the west side of Terry Avenue N. as well as incorporating parallel street parking pose critical issues for our current use as it relates to turning radius and access of large trucks and trailers. Our current operations are described below and we need to retain that minimum access:

- Scenery and rehearsal gear come to 200 Terry Avenue N. in trailers that are 53' Long, Tractors add up to 22' for a total of around 75'.
- Currently in order to access our load-in/out bays, we use every inch between our building and the cars parked across the street (on the West side of Terry). That is 50' between the Seattle Opera building and the cars across the street or 65' from the loading door to the cars across the street. We are only able to park in this small a space because some of our docks are at an angle.

- We do park a 45' trailer at one of our "straight in" docks. That leaves 20' to 25' for traffic down Terry Avenue N. and room for our tractor to hook up when we move that trailer. This is an absolute minimum to get this trailer in and out.

2 cont

The addition of curbed sidewalks and increased parking would need to retain this minimum footprint of access. *Note: We have had drivers who were not able to get trailers into our angled docks without moving either the cars across the street or some cars in front of the Seattle Opera Building. We have often had to shuffle trailers by pulling one trailer out and moving it so that the driver could get in to the "easier" slot. These maneuvers are not usually parking or pedestrian friendly. It is also essential to preserve the two-way traffic pattern on Terry Avenue N. from Thomas Street to Denny Way.*

Seattle Opera currently uses the following trucking routes to access Terry Avenue N.:

**Routes to 200 Terry Avenue N. from I-5 Mercer St exit**

- 1- Left on Fairview, Right on Thomas, Left on Westlake, Left on John, Left on Terry.
- 2- Right on Fairview, Left on Valley, Left on Westlake, Left on John Left on Terry.

**From 200 Terry Avenue N. to I-5**

Left on Thomas, Right on Westlake, Right on Mercer

Similar routes are used to travel to Mercer Street in order to access Seattle Center/McCaw Hall.

**Parking:**

It is essential that we retain the ability to use the space at the South end of the Seattle Opera building to park the following vehicles which are essential to a major opera company:

- 2 @ 53' trailers at the South end of the building.
  - 2 @ 53' trailers at the angled loading doors at the North end of the building.
  - 1 @ 45' trailer at a "straight in" loading door
  - 1 @ 40' trailer at a "straight in" loading door
- And our 16' van at a loading door

3

As referenced above, it is important that any curbed sidewalks or bollard systems on the west side of Terry Avenue N. not encroach or reduce the current access for both active load-in/out and large trailer/vehicle parking. With the addition of higher density, it is important to provide long-term (10-hour) parking options and evening/night parking options that can be used by performers, crafts people, that often work at times that transit systems do not service.

**Safe Pedestrian Routes:**

The transportation plan in the EIS calls for higher pedestrian access on many streets including Terry Avenue N. Because of the trucking and loading requirements, we propose that pedestrian corridors are proposed that do not narrow the current parking and load-in/out access that exists on Terry Avenue N. between Denny Way and Thomas Street. Large trucks and pedestrians are not an easy mix.

4

In addition, we are not opposed to the proposed hill climb pedestrian access that connect to John Street, but it is important that such an improvement which would require structural improvements or renovations to existing buildings are fully funded by an outside source.

**Character of Existing Neighborhood:**

As a civic partner to the community, we believe the alternatives need to honor the tenants that have invested in our community and reflect uses that are not only based on development potential, but also to adding to the character of the neighborhood. We endorse the concept of transferable development rights that might help preserve uses such as the opera's rehearsal and manufacturing facilities, but still allow financial incentives to be explored elsewhere in the neighborhood to encourage smart development.

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Holmes, Jim

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**From:** Jason Twill  
**Sent:** Monday, April 11, 2011 1:12 PM  
**To:** DPD\_Planning\_Division  
**Subject:** South Lake Union EIS Comments

I am a Seattle resident and a real estate practitioner. I am also an ex-New Yorker and have a fairly opinion about the value of proper density. South Lake Union is clearly an emerging mix-use city center and extension of the downtown core of Seattle. A high-level and long term (2100 plan) strategy for city right now should be to capture future population growth and new businesses in high-density urban core which the South Lake Union neighborhood is poised to do if taller buildings are allowed. This would mitigate new infrastructure stress on surrounding residential neighborhoods and promote more mass transit. Any inceased density being poposed should be inextricably linked to walkability, future energy/water needs, and reduced vehicular trips. Mass transit and the current level of daily SOV commutes to and from downtown are the Achilles heal of Seattle right now and proper urban density is the right tool to address this issue. Taller buildings would also allow for more open space at pedestrian level, more pocket parks, dog parks, simple corner parks with benches and outside eating table which is sorely needed downtown. 1

Any incentives mechanisms for taller buildings should consider community uses for the local area where increased dentisty is being considered. For instance, in New York, developers are allowed to increase their FAR is they provide a community use facility within the development that the nieghborhood needs such as a dentist/doctor office, dry cleaner, pharmacy, chil care facility etc.. One thing that SLU is lacking is schools which would motivate school age families to repopulate downtown and move into the urban core. Perhaps a school funding mechanism could be tied to density plan being considered for SLU? 2

Thanks

Jason S. Twill

Holmes, Jim

From: Tino Umali [seattledarling@gmail.com]  
 Sent: Monday, April 11, 2011 3:53 PM  
 To: DPD\_Planning\_Division  
 Subject: Comment about SLU EIS

Hello,

I am a native Seattlite, having been born at Virginia Mason in 1979 and have seen our fair city grow and blossom over the past 3 decades. I've lived in Magnolia, West Seattle, Queen Anne, Uptown and most recently, currently reside in the Denny Regrade. South Lake Union has become my adopted neighborhood as I do much of my grocery shopping at Whole Foods, attend yoga classes at Be Luminous, and frequently patronize the ever-growing number of restaurants and bars. Though, geographically I live closer to Belltown, I prefer the more neighborhood-feel of South Lake Union (SLU) and as a result spend a fair amount of my leisure time there. Another reason I prefer SLU over Belltown is I've noticed many of the businesses in the area are locally owned and run, and as a reflection of that, cater to people who work and live in that neighborhood. By contrast I feel many places in Belltown cater to a more boisterous crowd that swells during the weekends, indicating most of those patrons do not live or work in that zip code.

I am in full support of Alternative 1 for maximizing the increase in density for both commercial and residential projects. We need to take advantage of the momentum already in place thanks to the likes of Fred Hutch, Amazon and PATH, increasing density will make future projects that much more lucrative for developers and investors. With the recent waves in the economy, nationally and locally, other regional cities are vying for a greater slice of the economic pie, so to speak, Seattle must stay competitive with rebuilding our local economy and attracting not only companies who will offer high-paying positions, but also continue to attract the high-level of talent to fill those positions. Sometimes it is a catch-22, the more talent we have available, the more incentive for a company to do business in our city, the more employment opportunities available, the more talent we attract. We must also keep in mind although Washington state does not have an income tax, Seattle does have one of the highest sales tax rates in the nation, with that challenge it is imperative for us to be creative in thinking of ways for our city to appear more business-friendly. Allowing for taller, denser buildings, thus increasing a developers return on their investment is one way to do so.

Of course those taxes are necessary to maintain the infrastructure and services that contribute to the quality of life we enjoy here in the Emerald City. Having already invested in the SLU Streetcar line, it only makes sense to increase density in that area so that mode of transit can efficiently serve even more residents and employees with getting to and from the retail core and financial district, home to their neighborhood. At present, it appears that the Streetcar line is unfortunately, fairly underused.

With density also comes diversity, diversity in businesses as well as in residents, which will have a positive effect on area retailers. Residential diversity adds to a neighborhoods fabric and gives it more depth and texture. There is a reason why Seattle is Seattle and not Bellevue. Retail diversity is key in attracting shoppers and with increased residential density, foot-traffic will improve, not only that, if SLU can establish itself as a retail destination, shoppers from the retail core can also utilize the Streetcar to access all the shops, services and amenities SLU has to offer, so the line will be used more effectively in both directions. Aside from SLU being connected to mass transit, but by being bordered by Interstate 5 and Highway 99 it also makes it a smart choice for potential employers, as well as potential residents who have to commute, due to the ease of freeway access.

Growth is inevitable, but how that growth takes shape we can influence. Our region has no more room what-so-ever for increased sprawl, the only way to adequately and efficiently accommodate an increase in growth is upwards, with more density. Also, talented urban professionals, are a highly desirable demographic for a myriad of reasons, they often are in favor of creating and sustaining community, understand the infrastructure and services necessary to do so and the costs associated with doing so. South Lake Union has more or less sprung up as a neighborhood that fosters a community of such urban professionals and high-level talent, many of whom more and more choose to live close to the heart of the city. Queen Anne, I don't think will welcome much more density, nor will North Capitol Hill. Though, SLU, like most of Seattle has its fair share of history, I don't think there are as many complications to inhibit potential projects that a developer might encounter in say, Pioneer Square, which also features mass transit and close proximity to downtown, but is very strict with development partly due to being designated a Historic District. Oftentimes, if something is too complicated or not economically viable, one will look elsewhere, I suspect that is why Pioneer Square has stagnated for so long and has yet to grow into its full potential.

The infrastructure is there and so is the momentum, let us take full advantage of where we are at and take steps now to ensure Seattle remains progressive in smart growth and far-sighted sustainable urban planning. Raise both commercial and residential density in South Lake Union as much as possible.

Thank you for your time,

Tino Umali

Table 4-2

Responses to Public Comments Received During the Comment Period

Comment Number	Response
<b>Letter 160: Redman, Scott</b>	
1	<b>Support Height and Density Revisions.</b> The comments are noted.
<b>Letter 161: Reel, Richard</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
<b>Letter 162: Reel, Richard</b>	
1	<b>Underlying Zoning.</b> The comment is noted. Please see Final EIS Chapter 2 for clarification that existing underlying Seattle Mixed zoning is retained under all alternatives.
2	<b>View Analysis.</b> The view analysis was conducted in a manner consistent with the City of Seattle SEPA policies and as established in the EIS scope.
<b>Letter 163: Reel, Richard</b>	
1	<b>Environmental Benefits Statement.</b> The comment is noted.
<b>Letter 164: Rivera, Chris E.</b>	
1	<b>Floor Plate Size.</b> Beginning in late 2008 and continuing through 2009, the City worked with interested citizens and other stakeholders to define the alternatives to be studied in the EIS. Through this public process, the standard for commercial floor plate size was reduced from 35,000 sf to 24,000 sf. Please see the discussion of alternatives eliminated from consideration, Draft EIS Section 2.3.7. Conceivably, larger floor plate size may be appropriate in certain areas of the study area and localized study may be warranted.
<b>Letter 165: Roewe, Matthew H.</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
2	<b>Benefits of Growth.</b> As the commenter states, the EIS does not discuss the economic benefits of the proposal. As noted in WAC 197-11-402, EISs are required to identify potential significant adverse impacts, but are not required to address beneficial environmental impacts. Please see Final EIS Section 3.2 for a discussion of the City's Comprehensive Plan economic development policies.  As described in Draft EIS Chapter 2, the proposal considered in the EIS is the potential use of incentive zoning as a strategy to achieve neighborhood plan goals and other public benefits, but is not focused on overall growth citywide. Although it is recognized that growth that does not occur in South Lake Union

Comment Number	Response
	may locate in other parts of Seattle or the region, it would be speculative to estimate how much or where this growth might locate.
3	<b>Mitigation.</b> See response to Letter 18 Comment 33
4	<b>Uptown/SLU Joint Visioning Stakeholder Charrette.</b> The comment is noted.
5	<b>Urban Design Framework Plan.</b> The comment is noted. Please see references to the Urban Design Framework Plan in Final EIS Chapter 2 and Section 3.4 (Aesthetics).
6	<b>Affordable Housing Incentive.</b> The analysis of potential incentive benefits is dependent on individual developer decisions. Therefore, it would be speculative to quantify the potential for use of the affordable housing incentive. From a qualitative perspective, Draft EIS Section 3.9.2, Housing, describes that use of the incentive zoning provisions, have the potential to result in an increased number of affordable units than the No Action Alternative. The discussion in Section 3.9.2 further states that there are a number of factors that impact the potential for affordable housing, including development costs, property values, market demand, individual property owner goals, and opportunities for financing affordable housing. Under any of the alternatives, these factors will affect the actual number of affordable units that are built in the neighborhood.
7	<b>Other Public Amenity Incentives.</b> The analysis of potential incentive benefits is dependent on individual developer decisions. Therefore, it would be speculative to quantify the potential for use of incentives for public amenities. Comments are noted related to potential flexibility in any future incentive program.
8	<b>Residential/Commercial Incentives.</b> The alternatives assume that existing City policy at the time of a adoption of a future rezone would be reflected in the public benefit requirements. At this time, the 60/40 split applies to residential projects and 75/25 applies to commercial projects.
9	<b>Housing Displacement.</b> The comment is noted. Please note that the proposal under any of the action alternatives would not upzone any of the Seattle Mixed (SM) zoned areas. Instead, the proposal would provide the potential for increased height and density through an incentive zoning program. Under the action alternatives, the opportunity to use the incentive zoning would apply broadly to the majority of the neighborhood. Any older housing stock in this area could be impacted.
10	<b>Schedule.</b> Comment noted.

Comment Number	Response
<p><b>11</b></p>	<p><b>Flight Path.</b> Subsequent to issuance of the Draft EIS, additional review of the flight path was conducted (see Appendix F). This analysis included a review of how seaplane lanes are utilized (including runway utilization, flight tracks, and piloting techniques), an evaluation of the aircraft fleet used by floatplane operators, and documentation of the performance characteristics of the various floatplane aircraft. Several Federal Aviation Administration (FAA) and International Civil Aviation Organization (ICAO) planning documents that have applicability in the establishment of approach/departure protection boundaries for curving approach and departure procedures such as those used on Lake Union were also reviewed.</p> <p>Based on this analysis, and in coordination with WSDOT Aviation, a revised flight path was identified (see Section 3.2 of this Final EIS). This revised flight path differs from that shown in the Draft EIS in that portions are narrower than the previous flight path, the curvature is more gradual, and the east-west legs of the flight path have shifted slightly to the north. Specifically, the southern boundary has shifted 400-500 feet north so that the southern boundary lies north of Valley Street and is generally aligned with Broad Street. The southern boundary now crosses Aurora Avenue North at about Mercer Street. Similarly, the northern boundary of the flight path shifted 200-300 feet north, crossing the Lake Union shoreline at roughly Highland Drive and crossing Aurora Avenue just north of Ward Street. Please see Section 3.4 Aesthetics for revised images associated with the revised flight path.</p> <p>An additional mitigation measure has been recommended in this EIS – that a project-level analysis of wind impacts be required for all new development above the base height permitted under the Seattle Mixed zoning.</p>
<p><b>12</b></p>	<p><b>Assumptions.</b> The comments are noted. The EIS scope required that the aesthetics analysis be conducted for a build-out scenario. In addition, area-wide images show a 2031 scenario that based on future growth estimates. The minimum lot size is based on the alternatives description, as defined through the scoping process. The intention of this element of the alternatives is to limit the number of towers built on any block to a maximum of two, and to recognize the minimum lot size typically associated with major commercial construction.</p>
<p><b>13</b></p>	<p><b>Targeted Growth 2031.</b> The comment is noted. The figures titles have been revised per the comment, please see Final EIS Section 3.4.</p>
<p><b>14</b></p>	<p><b>Views Showing Full Build Out.</b> Please see response to Comment 13 in this letter, above. Area-wide images show a 2031 scenario. Resources, however, were not available to provide a build-out and 2031 scenario for each image. As required by the scope and in order to illustrate the most significant</p>

Comment Number	Response
	potential impacts, the analysis focused on the build-out scenario.
15	<b>Graphic Clarity.</b> Please see Section 3.4 of the Final EIS that includes a key code of the colors used in the study and what they signify (see Fig.3.4-2).
16	<b>Photo images.</b> Setbacks were not included in the proposed zoning alternatives and therefore were not included in their modeling in either the DEIS or the FEIS. However, building setbacks are being added as a desired mitigation on selected streets and adjacent to public parks. These setbacks meet or exceed the recommendations contained in the UDF.
17	<b>Viewsheds and the Space Needle.</b> The Draft EIS already references SMC 25.05.675.P in the Viewshed Section under 3.10-5. This section describes the protected viewpoints in some detail, including Volunteer Park. The impacts of the various alternatives on views of the Space Needle are contained in 3.10-6.
18	<b>1-5 Scenic Routes Vistas.</b> The comment is noted. Language has been added to Final EIS Section 3.4 noting that some view obstructions already exist
19	<b>Volunteer Park Vista.</b> The photograph was cropped to make clear the potential impact of the alternatives on the protected view of the Space Needle. Use of the broader perspective of a panoramic view distracts from and makes it difficult to evaluate, the impact on the Space Needle.
20	<b>Relative Cross Section Study.</b> While multiple cross-section studies are not included in the EIS, the relationship to surrounding grade is highlighted in the views from Gas Works Park that is shown for each alternative at the beginning of the Draft EIS Aesthetic Section in 3.10-2 (Figures 3.10-3, 3.10-5, 3.10-7 and 3.10-9).
21	<b>Commercial Parking Assumptions.</b> It was assumed commercial projects would maximize floor area up to an FAR of 7, and no explicit assumption about commercial parking was made for the capacity or Aesthetics analysis.
22	<b>Metrics.</b> The referenced assumptions relate to development of a capacity estimate for the neighborhood and are unrelated to future development standards. Please see the footnotes in Table 2-3, which are consistent with the 55% residential new development and 45% commercial new development assumptions in Appendix C. As noted in the comment, this equals a ratio of 60% jobs and 40% housing units, as shown in the table.
23	<b>Development Standards.</b> The comments are noted.

Comment Number	Response
<b>Letter 166: Rusch, Scott</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
2	<b>Floor Plate Size.</b> Beginning in late 2008 and continuing through 2009, the City worked with interested citizens and other stakeholders to define the alternatives to be studied in the EIS. Through this public process, the standard for commercial floor plate size was reduced from 35,000 sf to 24,000 sf. Please see the discussion of alternatives eliminated from consideration, Draft EIS Section 2.3.7. Conceivably, larger floor plate size may be appropriate in certain areas of the study area and localized study may be warranted.
3	<b>Public Benefit.</b> The comment is noted.
<b>Letter 167: Russell, Eric</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
<b>Letter 168: Sather, Katherine</b>	
1	<b>Support Growth.</b> The comments are noted.
<b>Letter 169: Saucier, Lyn</b>	
1	<b>Support Alternative 1.</b> The comments are noted.
<b>Letter 170: Schauer, Tom</b>	
1	<b>Support Alternative 1.</b> The comments are noted.
<b>Letter 171: Severt, Ron</b>	
1	<b>View to Space Needle.</b> The concern is noted and it is acknowledged that the Space Needle is the most recognized historic landmark in the City. It is also acknowledged that South Lake Union is one of the City's six designated Urban Centers where future concentrations of employment and housing are planned to occur. The City recognizes that it is unreasonable to expect that views of the Space Needle are to be protected from all of public locations without consideration of City policies regarding Urban Centers and the concentration of employment and housing. As noted in the <i>Seattle's View Protection Policies, Volume One</i> , <sup>2</sup> "[c]ompeting policy objectives require that

<sup>2</sup> Seattle, city of; Department of Design, Construction and Land Use and the Strategic Planning Office. 2001. *Seattle View Protection Policies, Volume One – Space Needle*

Comment Number	Response
	we consider the merit of protecting a particular view corridor with other objectives for growth management, housing development, transportation and utility infrastructure and open space.”
2	<b>Urban Form.</b> It is acknowledged that the Space Needle is the City’s most recognized landmark. As noted with regard to Comment #1, the City’s view protection policies must also reflect the City’s growth management policies. The City’s height, bulk and scale policies have not specifically focused on creating an urban form that establishes an openness proximate to the Space needle. What is perceived as a step-down in South Lake Union has as a basis the historical light industrial/manufacturing uses that occurred in this part of the City.
3	<b>Space Needle Landmark Status.</b> While background information associated with the Landmark designating ordinance addresses a broad range of factors, the designating ordinance does not specify elements of the structure’s form that contribute to its significance nor does the ordinance attach significance to views from the structure.
4	<b>Space Needle Views.</b> The analysis entitled <i>Seattle’s View Protection Policies, Volume One</i> and <i>Volume 2</i> <sup>3</sup> focused on the Space Needle and views of the Space Needle from a broad range of designated public viewpoints. The focus of the analysis was to address “implications for the preservation of Space Needle views from adjacent neighborhoods and the implications and comparative values associated with preservation of those views.” The study resulted in legislation that modified the City’s Public View Protection policies (25.05.675 P.) and specifically identified locations in which public views of the Space Needle are to be protected. While three public viewpoints either in or east of South Lake Union were considered (Cascade Playground, Lake Union Park and Four Columns Park), it was concluded that none of those viewpoints would be included as designated Space Needle view protection locations. This was largely due to a recognition that build-out to the then allowed zoning could significantly obstruct views of the Space Needle from those locations.
5	<b>Proposal Objectives.</b> The additional objectives of the proposal proposed by the comment are noted. It is also recognized that the South Lake Union area

*Executive Report & Recommendations and Volume Two – Space Needle View Inventory & Assessment.*

<sup>3</sup> Ibid.

Comment Number	Response
	<p>has been designated as one of the City's six Urban Centers. These are key areas of the City in which concentrations of employment and housing are planned and are to be encouraged.</p> <p>As described in Chapter 2, the continuation of existing zoning would preclude the use of zoning incentives as a strategy to achieve neighborhood plan goals and other public benefits. Incentive zoning would allow increased height and density if public benefits defined in City code are provided. Among the objectives listed in the EIS, the potential to provide public amenities and to achieve neighborhood plan goals would result in a public benefit that is directly related to the use of incentive zoning provisions for increased height and density. Please see Section 2.3.2, for a discussion of possible incentives.</p>
<p><b>6</b></p>	<p><b>Flight Path and FAA Requirements.</b> Subsequent to issuance of the Draft EIS, additional review of the flight path was conducted (see Appendix F). This analysis included a review of how seaplane lanes are utilized (including runway utilization, flight tracks, and piloting techniques), an evaluation of the aircraft fleet used by floatplane operators, and documentation of the performance characteristics of the various floatplane aircraft. Several Federal Aviation Administration (FAA) and International Civil Aviation Organization (ICAO) planning documents that have applicability in the establishment of approach/departure protection boundaries for curving approach and departure procedures such as those used on Lake Union were also reviewed.</p> <p>Based on this analysis, and in coordination with WSDOT Aviation, a revised flight path was identified (see Section 3.2 of this Final EIS). This revised flight path differs from that shown in the Draft EIS in that portions are narrower than the previous flight path, the curvature is more gradual, and the east-west legs of the flight path have shifted slightly to the north. Specifically, the southern boundary has shifted 400-500 feet north so that the southern boundary lies north of Valley Street and is generally aligned with Broad Street. The southern boundary now crosses Aurora Avenue North at about Mercer Street. Similarly, the northern boundary of the flight path shifted 200-300 feet north, crossing the Lake Union shoreline at roughly Highland Drive and crossing Aurora Avenue just north of Ward Street. Please see Section 3.4 Aesthetics for revised images associated with the revised flight path.</p> <p>An additional mitigation measure has been recommended in this EIS – that a project-level analysis of wind impacts be required for all new development above the base height permitted under the Seattle Mixed zoning.</p>
<p><b>7</b></p>	<p><b>Summary Section.</b> Please see revisions to the summary section in Chapter 1 of this Final EIS. The summary section is intended to be just that – an</p>

Comment Number	Response
	<p>overview of the project and salient points with regard to impacts of the alternatives. As noted at the beginning of the section, the information is intentionally brief and the reader is encouraged to refer to Chapters 2 and 3 for more detailed information. To the extent that quantitative data is available, the summary section attempts to incorporate such data. In other cases, the qualitative and comparative conclusions of the analyses are included.</p>
8	<p><b>Shoreline Management Act.</b> Please see Final EIS Section 3.2 for discussion of the City's Shoreline Management Program as it relates to the proposal.</p>
9	<p><b>Flight Path.</b> Subsequent to issuance of the Draft EIS, additional review of the flight path was conducted (see Appendix F). This analysis included a review of how seaplane lanes are utilized (including runway utilization, flight tracks, and piloting techniques), an evaluation of the aircraft fleet used by floatplane operators, and documentation of the performance characteristics of the various floatplane aircraft. Several Federal Aviation Administration (FAA) and International Civil Aviation Organization (ICAO) planning documents that have applicability in the establishment of approach/departure protection boundaries for curving approach and departure procedures such as those used on Lake Union were also reviewed.</p> <p>Based on this analysis, and in coordination with WSDOT Aviation, a revised flight path was identified (see Section 3.2 of this Final EIS). This revised flight path differs from that shown in the Draft EIS in that portions are narrower than the previous flight path, the curvature is more gradual, and the east-west legs of the flight path have shifted slightly to the north. Specifically, the southern boundary has shifted 400-500 feet north so that the southern boundary lies north of Valley Street and is generally aligned with Broad Street. The southern boundary now crosses Aurora Avenue North at about Mercer Street. Similarly, the northern boundary of the flight path shifted 200-300 feet north, crossing the Lake Union shoreline at roughly Highland Drive and crossing Aurora Avenue just north of Ward Street. Please see Section 3.4 Aesthetics for revised images associated with the revised flight path.</p> <p>Final EIS Section 3.4 provides revised images showing urban form and views with the revised flight path.</p> <p>This programmatic EIS included a qualitative analysis of potential wind impacts. From a quantitative perspective, numerous factors will affect wind patterns in an urban area. The most critical of these are building heights, location, orientation, and massing. At the subarea level of analysis, it is impossible to accurately forecast these factors for all development in the subarea. Therefore, the programmatic analysis contained in the EIS describes</p>

Comment Number	Response
	<p>a range of potential vertical and horizontal impact areas, depending on the type of development that may occur.</p> <p>At the same time, it is agreed that it is essential to conduct a quantitative wind analysis of individual development proposals to ensure that wind impacts on the Lake Union Seaport Airport are mitigated. Therefore, an additional mitigation measure requiring a project-level analysis of wind impacts for all new development above the base height permitted under the Seattle Mixed zoning is recommended. The approach to this analysis would include the following steps:</p> <ol style="list-style-type: none"> <li>1. Construct a physical scale model of the proposed project and/or the maximum building envelope allowed at that site, with the surrounding physical context (i.e., existing buildings, topography, etc.)</li> <li>2. Install the model into a boundary layer wind tunnel and measure velocities and turbulence levels along the prescribed flight path with and without the proposed project</li> <li>3. Test for prevailing wind directions and/or wind directions that are expected to have an impact on the flight path</li> <li>4. Present resulting data in a form to allow for quantitative comparison between existing and proposed conditions</li> <li>5. Provide a written report summarizing the methodology, results and interpretation of the results against any available published aviation standards for shear layers and turbulence levels. Analysis results would require interpretation by an aviation specialist who would assess the acceptability of these specific results for the aircraft actually used at this location.</li> </ol> <p>In addition, the City may consider requiring additional analysis to address the following questions:</p> <ul style="list-style-type: none"> <li>• Additional review to address potential future adjacent development (i.e., a future configuration which may augment or mitigate predicted impacts in the future)</li> <li>• Testing of mitigation schemes if the project results are unacceptable (i.e., the wind tunnel study could be then used to help define a height, size and location on that site that could be acceptable).</li> </ul>
<p><b>10</b></p>	<p><b>Growth Estimates.</b> The 2031 numbers discussed in Draft EIS Section 2.2 are not targets, but are estimates intended to provide additional context for understanding potential long-term growth in South Lake Union. As noted in the discussion in this section, the estimate is for analysis purposes only and does not represent policy intent by the City. In order to disclose the potential range of capacity needed to meet a future growth target for South Lake</p>

Comment Number	Response
	<p>Union, both 2024 and 2031 are considered in the analysis.</p> <p>In Draft EIS Section 3.8, additional discussion of the Seattle Comprehensive Plan Urban Village Element states that formal City action to establish a growth will occur in the future based on an analysis of the capacity of all of the urban centers and other areas of the City. Consistent with the Washington Growth Management Act, the South Lake Union 2031 growth target that is ultimately proposed and adopted by the City will reflect an understanding of overall development capacity.</p>
<p><b>11</b></p>	<p><b>Building Height Transition.</b> The comment is noted. Please refer to Draft EIS Section 3.10 for a discussion of building height and impacts of the alternatives.</p>
<p><b>12</b></p>	<p><b>Viewshed Analysis.</b> See response to Comment # 1 and #4 above. As indicated previously, there are no officially-designated City public viewpoints either in the South Lake Union area or immediately east of South Lake Union relative to the protection of public views of the Space Needle. Street-level right-of-way corridor views of the Space Needle would not be affected by the proposed alternatives.</p> <p>Although the viewshed analysis did not find that there were “significant unavoidable adverse impacts” from view blockage of the Space Needle, views of the Space Needle are highly valued in the surrounding communities and mitigation measures are included in this Final EIS to recognize views to the Space Needle from both inside and outside South Lake Union.</p> <p>These recommended mitigation measures include increased tower spacing and upper level setbacks on both John and Thomas Streets consistent with the recommendations of the South Lake Union Urban Design Framework. Building heights would also be lower to the Northeast of the Space Needle as a result of the revised flight path for take-offs and landings associated with Lake Union Airport, which could further improve views between Lake Union and the Space Needle.</p> <p>The requested views toward the Space Needle from the new Lake Union Park were provided in Appendix D of the Draft EIS (Figures 5 through 8). Views depicted in Appendix D demonstrate that views to the Space Needle could be totally blocked from a majority of the park area in the incentive zoning alternatives (Alternatives 1–3) and partially blocked under current zoning (Alternative 4). The reverse view shown in Figures 17 through 20 suggests that the upper portion of the Space Needle would remain visible from other locations within the park – to a greater or lesser degree depending on the alternative. (Note that the 3-D model and views already take the flight path restrictions into account.)</p>

Comment Number	Response
	<p>As noted, views from Lake Union Park toward the Space Needle are not currently addressed by the City's SEPA ordinance and a change to that ordinance would be required to protect views between the park and the Space Needle.</p> <p>The views from the Space Needle Observation Deck have been labeled in Section 3.4 of the Final EIS.</p> <p>Views from the Banquet Level and impacts from future growth in the Denny Triangle and Uptown area are not within the scope of this study.</p> <p>All of the views included in the viewshed analysis are from street-level at the location designated in Figure 3.10-22. Bird's eye views provided at the opening of the Aesthetic section are intended only to show the entire neighborhood in context with the surrounding area.</p>
13	<p><b>Light and Glare.</b> Discussion of the potential impact of future building lighting on views of the Space Needle is included in Final EIS Section 3.4.</p>
14	<p><b>Historic Preservation.</b> The Space Needle is a designated Seattle Landmark. None of the proposed alternatives would have an effect on the landmark status of the Space Needle.</p> <p>While overall potential impacts related to historic preservation within the study area are discussed in this programmatic document, potential impacts to individual landmarks would be considered more specifically and in greater depth at such time as specific projects are proposed.</p> <p>Regarding the concern about potential view blockage "to and from" the Space Needle, please refer to the Aesthetics section for a more complete viewshed analysis. Public views of the Space Needle are protected from certain public places (as set forth in SMC 25.05.675 P2c) and potential blockage of the protected views is considered more specifically for each proposed project. Seattle SEPA policies do not afford protection of views from private property, such as the Space Needle.</p>
15	<p><b>Transportation Analysis.</b> As described in Draft EIS Section 3.13.2 and Figure 3.13-13, planned projects associated with the Mercer East and Mercer West projects were incorporated into the transportation analysis.</p> <p>For response to comments regarding the MXD methodology, please see Letter 13, responses to Comments 93 and 94. For comments related to mitigation feasibility, please see Letter 12, response to Comment 15.</p>
16	<p><b>Impacts to the Seattle Center.</b> The comment is noted. Although impacts to the Seattle Center were not identified as part of the analysis in the final scope of the EIS, the potential adverse impacts associated with views to the Space Needle are disclosed in the Draft EIS. Although not discussed in the Draft EIS,</p>

Comment Number	Response
	<p>it is reasonable to expect that there would be a potential positive impact of an increased residential and office population to replace lost visitation and revenues, were such losses to occur.</p> <p>Impacts to public services and facilities are disclosed in the EIS. Infrastructure mitigation identified in the Draft EIS assumes implementation of existing plans and policies for transportation facilities, and project-specific mitigation for sewer, water and stormwater facilities.</p>
<p><b>17</b></p>	<p><b>Economic Analysis.</b> The comment is noted. The City issued the Scoping Notice for this Draft EIS on November 18, 2008 and invited comments on the EIS scope through December 18, 2008. Subsequently, the City worked with neighborhood stakeholders to address concerns raised in the scoping comments. Based on this process, the City revised the EIS alternatives and finalized the scope of the EIS. Based on this process, analysis of the current economic conditions were not included as</p> <p>Analysis of economic conditions were not included as part of the EIS scope. Because this EIS considers a 2031 planning horizon, review of current economic conditions was not considered to provide information that would help inform decisions about long-term height and density standards in the neighborhood.</p>
<p><b>18</b></p>	<p><b>Construction Impacts.</b> Construction impacts were not included in the scope of this programmatic EIS. Potential, planned and existing facilities described in the comment could occur regardless of the South Lake Union Height and Density alternatives. It would be speculative to anticipate the magnitude and timing of future redevelopment in the South Lake Union neighborhood. As site-specific development is proposed, project level SEPA analysis will identify construction impacts and appropriate mitigating measures.</p>
<p><b>19</b></p>	<p><b>Summary.</b> The comment is noted.</p>
<p><b>Letter 172: Sharp, Jeff</b></p>	
<p><b>1</b></p>	<p><b>Support Greater Height and Density.</b> The comments are noted.</p>
<p><b>Letter 173: Shushan, Stephanie</b></p>	
<p><b>1</b></p>	<p><b>Support Lower Height Restrictions.</b> The comment is noted.</p>
<p><b>Letter 174: Simonetti, Martin</b></p>	
<p><b>1</b></p>	<p><b>Floor Plate Size.</b> Beginning in late 2008 and continuing through 2009, the City worked with interested citizens and other stakeholders to define the alternatives to be studied in the EIS. Through this public process, the standard for commercial floor plate size was reduced from 35,000 sf to</p>

Comment Number	Response
	24,000 sf. Please see the discussion of alternatives eliminated from consideration, Draft EIS Section 2.3.7. Conceivably, larger floor plate size may be appropriate in certain areas of the study area and localized study may be warranted.
<b>Letter 175: Sleicher, Charles</b>	
1	<b>Strong Opposition.</b> The comment is noted.
2	<b>Heights Near the Shoreline.</b> The comments are noted.
3	<b>Opposed to Density Increase.</b> The comments are noted.
4	<b>Proponents.</b> The comments are noted.
<b>Letter 176: Smith, Patricia</b>	
1	<b>Support Alternatives 3, 4.</b> The comments are noted.
<b>Letter 177: Smithhart, Noelle</b>	
1	<b>Design Review.</b> The comments are noted.
<b>Letter 178: Snorksby, Paul</b>	
1	<b>Support Densification.</b> The comments are noted.
<b>Letter 179: Starr, Scott</b>	
1	<b>Support Increased Density.</b> The comments are noted.
<b>Letter 180: Stepherson, Josh</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
<b>Letter 181: Stoner, Mark</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
<b>Letter 182: Sullivan, David</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
<b>Letter 183: Surdyke, Scott</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
2	<b>Benefits.</b> The comments are noted.
3	<b>Ground Floor Residential.</b> The comment is noted.
4	<b>Construction Costs.</b> The comment is noted.

Comment Number	Response
5	<b>Shoreline Uses.</b> The comment is noted.
<b>Letter 184: Suver, Joanne</b>	
1	<b>Lake Union Natural Treasure.</b> The comment is noted.
<b>Letter 185: Symonds, Drew</b>	
1	<b>Support Tallest Building Heights.</b> The comment is noted.
<b>Letter 186: Tangen, John</b>	
1	<b>Support Increased Building Heights.</b> The comment is noted.
<b>Letter 187: Thordarson, Michelle</b>	
1	<b>Support Additional Height and Density.</b> The comment is noted.
<b>Letter 188: Timpson, E. Diana</b>	
1	<b>Retain Character and Heritage.</b> The comment is noted.
2	<b>Transit Use.</b> The comment is noted.
3	<b>Density, Height, Affordability.</b> The comment is noted.
4	<b>Incentives.</b> The comment is noted. Regarding shadows, the mitigation strategies call for a detailed shadow analysis as part of site-specific environmental review of development proposals. As identified by Seattle Municipal Code 25.05.675Q2e, there are a range of measures to address shadow impacts of specific development proposals.
5	<b>Mixed Use.</b> The comment is noted. Existing zoning for the majority of the South Lake Union is Seattle Mixed, which allows for a wide range of uses. Overall, residential development under all of the action alternatives would have the potential to achieve greater building height than office development, which may serve as an incentive for residential development, particularly under Alternative 3. As described in Section 2.3.5, Alternative 3 focuses potential height increases on residential uses and retains existing maximum building heights for office uses in much of the neighborhood.
6	<b>Office Park Development.</b> The comment is noted.
7	<b>Family-oriented Amenities.</b> As described in Final EIS Chapter 2, a fundamental objective of the proposal considered in the EIS is to use incentive zoning to achieve public benefits, including those listed in the comment. Please see Draft EIS Section 3.16 for a discussion of open space and recreation facilities and Final EIS Section 3.5 for a discussion of schools.

Comment Number	Response
8	<b>Podium Heights.</b> The comment is noted.
9	<b>Whole Foods Block.</b> The comment is noted.
10	<b>Lakefront Towers.</b> The comment is noted.
11	<b>View Images.</b> Please see Final EIS Section 3.4 for revised view and street-level images.
12	<b>Podium Heights.</b> The comment is noted.
13	<b>View Images.</b> Please see Final EIS Section 3.4 for revised view and street-level images. These images are based on a build-out scenario, which is a conservatively high assumption about potential development levels.
14	<b>Mitigation Strategies.</b> Please see Final EIS Section 3.4 for a revised discussion of mitigation strategies that incorporate recommendations of the Urban Design Framework.
15	<b>Above Grade Parking.</b> The comment is noted.
16	<b>Cost of Development.</b> The relative cost of development on liquefaction prone soils depends on the size and type of building. Such decisions are project specific in nature.
17	<b>Dewatering.</b> Permanent dewatering involves locally lowering the groundwater table (often using pumps) to minimize the effects of seepage on underground portions of a structure. It is not necessarily required at a site; there are other options to minimize the effects of seepage, including installation of liners. Permanent dewatering can be an expensive alternative, particularly when the costs of long-term maintenance are considered. However, it is certainly a viable option for managing groundwater, and is a widely used technique in western Washington. The decision on whether permanent dewatering would be necessary, effective, or economically feasible would need to be made on a site-by-site basis.
18	<b>Changes to Native Soil.</b> While a change to native soil conditions may not have a visible effect, it does constitute a significant change to the existing natural environment (and thus is appropriate to mention in an EIS). Changes to existing soil conditions could have impacts such as changing the pattern of groundwater flow or infiltration in an area. The paragraph to which this comment refers (paragraph 1 on 3.1-6) also points out that the native/existing soil may need to be replaced with suitable material. The process of replacing the soil might result in greater construction traffic as trucks are required to haul away unsuitable material and import suitable material.
19	<b>Support Increased Heights.</b> The comment is noted.

Comment Number	Response
<b>Letter 189: Trainer, Steve</b>	
1	<b>Support Increased Height and Density.</b> The comment is noted.
2	<b>Floor Plate Size.</b> Beginning in late 2008 and continuing through 2009, the City worked with interested citizens and other stakeholders to define the alternatives to be studied in the EIS. Through this public process, the standard for commercial floor plate size was reduced from 35,000 sf to 24,000 sf. Please see the discussion of alternatives eliminated from consideration, Draft EIS Section 2.3.7. Conceivably, larger floor plate size may be appropriate in certain areas of the study area and localized study may be warranted.
3	<b>Podium Heights.</b> The comment refers to the podium height, which varies from 20 feet to 85 feet under the action alternatives. Because the podium would be used in conjunction with a tower, it is not a downzone, or reduction in allowed height. In all cases, the underlying Seattle Mixed zoning and development standards remain intact for situations where the incentive zoning provisions are not used.
4	<b>8<sup>th</sup> Avenue Height Limit.</b> The comment is noted.
5	<b>Oppose Residential Focus on 8<sup>th</sup> Avenue.</b> The comment is noted.
6	<b>Retail Environment on 8<sup>th</sup> Avenue.</b> The comment is noted.
<b>Letter 190: Tung, Beatrice</b>	
1	<b>Opposed to Alternatives 1 and 2.</b> The comment is noted.
<b>Letter 191: Turner, John</b>	
1	<b>Support Alternative 1.</b> The comment is noted.
<b>Letter 192: Tweedale, Kelly</b>	
1	<b>Retain Current Uses of Terry Avenue North.</b> The comment is noted.
2	<b>Freight Access.</b> The Seattle Opera brings up a variety of specific freight concerns related to their property. This Draft EIS examines an increase in the overall height and density throughout South Lake Union and identifies a significant and unavoidable impact to freight. However, it is outside the scope of this project to evaluate specific truck movements for specific properties. These concerns are noted, but would need to be addressed as part of a specific project when and if redevelopment occurs adjacent to the property.
3	Please see response to Comment 2 in this letter, above.
4	Please see response to Comment 2 in this letter, above.

Comment Number	Response
5	<b>Support TDR.</b> The comment is noted.
<b>Letter 193: Twill, Jason</b>	
1	<b>Support High Density.</b> The comment is noted.
2	<b>Incentives and Community Uses.</b> As described in Final EIS Chapter 2, a fundamental objective of the proposal considered in the EIS is to use incentive zoning to achieve public benefits, including those listed in the comment. Please see Final EIS Section 3.5 for a discussion of schools.
<b>Letter 194: Umali, Tino</b>	
1	<b>Support Alternative 1.</b> The comments are noted.

### **Comment Letters 195-206**

<b>195.</b>	Van Til, Steve
<b>196.</b>	Vice, Jodie
<b>197.</b>	Walker, Dewey
<b>198.</b>	Warren, Robert. P.
<b>199.</b>	Waymire, Jim
<b>200.</b>	Weber, Brandon G.
<b>201.</b>	Williams, Susanna
<b>202.</b>	Winges, Linda D
<b>203.</b>	Wood, Stephen
<b>204.</b>	Yamamoto, Julianna
<b>205.</b>	Yamamoto, Mike
<b>206.</b>	Zak, Gary

April 11, 2011

Seattle Department of Planning and Development  
Attn: James Holmes

Dear Mr. Holmes,

I have worked in downtown Seattle for over 15 years and appreciate the many benefits afforded by the dense, efficient development of downtown. I encourage the City of Seattle to adopt new zoning in the South Lake Union neighborhood that will encourage the greatest potential for increased height and density for the benefit not only of those working and living in the SLU neighborhood, but also for the benefit of the region. 1

The benefits of a dense urban core are obvious to most. It allows for efficient investment in and maintenance of public infrastructure, including roads, utilities, and transit. It leads to sustainable and diverse retail and dining choices. It supports a wide range of housing alternatives, close to where jobs are being created. It sustains delivery of public services in an efficient manner.

The South Lake Union neighborhood has been transformed over the past 10 years into a thriving community under the existing moderate zoning, but every new building constructed under existing zoning locks-in a lost opportunity to maximize the benefits of density for the long-term. We need to have a vision for the neighborhood and for Seattle for the next 50-100 years, not just the next 10. With the right zoning, SLU can accommodate a significant share of Seattle's near-term job and household growth and it is a logical place to encourage this growth. The neighborhood will benefit from increased amenities, safety, and vibrancy, the City will benefit from growth of its tax base, and the region will benefit from reduced sprawl.

Encouraging increased density in SLU has obvious benefits and is perhaps the easy part. But what about increased height? I know there are some people that are discouraging increased height and density in SLU because they are concerned about impacts to their views. While there will be a few views that are negatively impacted by taller buildings, ironically, if we seek to increase density in the neighborhood without proportionately increasing height, then far more views will be significantly impacted and it will result in less open space. From a public policy perspective, the City should not seek to protect a few private views at the expense of overwhelming public benefits. 2

As the City considers potential changes to zoning in the South Lake Union neighborhood to help achieve the Neighborhood Plan goals, I strongly encourage a long-term vision that supports neighborhood vitality, economic prosperity for the City, and environmental sustainability for the region. I believe encouraging the greatest potential for increased height and density is consistent with this long-term vision. With the development momentum occurring in SLU today, you have one shot to get this right for many generations to come. Thank you for your consideration. 3

Sincerely,

Steve Van Til

Holmes, Jim

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From: Jodie Vice [jodievice@yahoo.com]  
Sent: Sunday, April 03, 2011 12:14 PM  
To: DPD\_Planning\_Division  
Subject: SLU Height & Density Draft EIS - Public Comment

To City of Seattle DPD,

As a City of Seattle resident and supporter of good city planning, density, and walkable communities, I am formally submitting comments on the Draft EIS for the South Lake Union height and density study. I believe Seattle needs to be bold in our leadership to support urban infill. Giving more people the opportunity to live in close proximity to where they work, is going to support the City's goals to reduce carbon emissions and sprawl. As the former Chair of the Seattle Pedestrian Advisory Board, I understand that density helps create a pedestrian-friendly, safe neighborhood - more "eyes on the street." South Lake Union provides a unique neighborhood with good transportation and open space. Proximity to Lake Union and downtown creates an oasis complete with recreational and urban experiences that should have a maximum amount of density. Everyone in the City will benefit from more height in South Lake Union - more people paying property taxes and more opportunities for job creation.

Seattleites tend to be "NIMBYS" when it comes to density. It's time to focus more density including taller buildings right near our downtown because history shows, we will not get tall buildings in our residential neighborhoods. This is the right time and place to get it right NOW. That is why I support Alternative 1 - Let's be bold in at least one Seattle neighborhood. We do have to lose? Let's support density, livability, reduced emissions and jobs in the City.

Sincerely,  
Jodie Vice

Beacon Hill resident, supporter of density  
Former Chair of the Seattle Pedestrian Advisory Board and former Futurewise Boardmember

820 Blanchard Street, #1404  
Seattle, WA 98121  
April 6, 2011

Seattle Department of Planning and Development  
700 Fifth Avenue, Suite 1900  
Seattle, WA 98124-4019      Attention: Jim Holmes

Dear Mr. Holmes,

As a resident of the South Lake Union community and as a registered voter, I am writing to express my opinion about the current EIS alternatives. I will also propose my vision for the neighborhood.

South Lake Union community has unparalleled possibilities. I envision a village, which I am naming Lake Union Village or LUV (Imagine the signage: SHARE THE LUV or WHAT YOU NEED IS LUV). The concentrated area of the village could extend down Terry and Westlake where already quality restaurants are blossoming, to the four Mercer-Valley blocks that are perpendicular to Terry/Westlake. Several pedestrian bridges across Mercer would negate the traffic barrier of Mercer and ensure ease of mobility as well as safety. Across Valley is the new SLU Park and the museum slated for opening in 2012. Add residential towers built to a maximum of 200 ft, to protect the step-down height limits already a precedent for Seattle. Furthermore stores like ones at University Village would attract shoppers. The area is already teeming with Amazon employees during the day. We need to add attractions for the evenings and weekends. Picture this, residents, shoppers, stores, a museum, children, fountains and open space for the people of the community as well as tourists and suburbanites to gather and enjoy the entire expanse from town via the trolley down to the waterfront. And there is even a boat ride to be had! The foundation for a vibrant village has been laid. To complete this crown jewel, we need to add the attractions and structures and control the balance of financial interests versus aesthetics.

I favor EIS Alternative 3 with the addition of pedestrian quarters between Mercer and Valley. Maintaining the precedent of step-down heights of buildings from the city to the lake is both desirable and provides a sense of balance to the space. Furthermore, multiple plots of property exist in the Denny triangle that could be developed into office space and or residences absorbing some of the perceived need for maximum density in South Lake Union. Building South Lake Union to the maximal tolerated speaks only to financial interests and not necessarily to aesthetics and creative urban development.

Thank you for your important work.

Sincerely,

*Dewey Walker*

Dewey Walker

**King, Donna**

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**From:** bob warren [bob.warren@yahoo.com]  
**Sent:** Monday, April 11, 2011 8:01 AM  
**To:** DPD\_Planning\_Division  
**Subject:** Comments on the EIS Draft

I want to address the EIS proposal and join the overwhelming voices against Alternatives 1 and 2. Both of these proposed are calculated to severely impact the neighborhood and only visit the worst of air, transportation, and urban visual blite on our community. Our neighborhood can not support the traffic and huge influx of residents that Alternative 1 & 2 create. The city infrastructure does not support these two draft proposals. A more thoughtful and modest proposal like Alternative 3 or what I believe is best, Alternative 4, are much more in line with the nature and scope of our community. Both Alternative 1 and 2 would create horrible visible pollution and block the wonderful views of the city and its surrounding. Seattle is not a city of concrete and glass but a community steeped in the tradition of preserving and placing a high value on the beauty of nature. After a full review of the EIS, I urge you to completely reject Alternative 1 and 2 and to find a compromise between Alternatives 3 and 4.

Thank you for this opportunity to comment on the South Lake Union EIS.

Robert P. Warren  
900 Lenora Street, Apt W1203  
Seattle, WA 98121

Holmes, Jim

**From:** Jim Waymire  
**Sent:** Monday, April 11, 2011 10:29 AM  
**To:** Holmes, Jim  
**Subject:** SLU Draft EIS - Pedestrian Safety  
**Attachments:** Mercer Crossing.pdf

Jim,

Thanks for the opportunity to comment on the Draft EIS for the re-zone of the South Lake Union.

I am an architect with decades of experience supporting public and private initiatives to improve the South Lake Union Neighborhood. Among those efforts was my planning and design leadership of the West Lake Union Center project for Fisher Properties. That project included the Westlake Avenue Pedestrian Bridge and the connecting Galer Street Hillclimb. Those amenities provide pedestrian access to the Lake Union shoreline for residents of the Queen Anne Neighborhood. The route was later enhanced by construction of the Aurora Avenue Pedestrian Bridge. Families can now enjoy a safe walk from their homes to the amenities of the lake, facilitated by grade-separated crossings of the Aurora and Westlake Avenue arterials. The City of Seattle, in particular the Parks Department, was an active partner in those planning efforts. The City went on to support the extension of the Galer Street pedestrian route with the planning of the pedestrian bridge now spanning the rail lines which finally completes the pedestrian link to Elliott Bay.

I enthusiastically support the intentions of the SLU Re-zone, and in particular the objective to make South Lake Union "home" to thousands of Seattle families. However, I am dismayed to see so little consideration in the Draft EIS for the safety and experience of those family members who will make their ways to the amenities of the Lake Union shoreline. Specifically, the Draft EIS seems blind to the obvious and potentially deadly conflict between the objectives of expediting the heavy east-west auto and freight traffic to and from the interstate freeway system along Mercer Street, and the inclusion of the Lake Union amenities into the quality of family life for those living south of Mercer. The resolution of that conflict requires the construction of one or more "accessible" and enclosed pedestrian bridges across Mercer Street.

The attached pdf document summarizes the case for pedestrian bridges as the only reasonable mitigation for Mercer Street's impacts.

Even in its current state, the collective negative impacts of the 4-lane Mercer Street are grim. However, the impending combination of Mercer's east bound flow and Valley Street's comparable west bound flow into a new 6-lane Mercer Street will create a torrent of truck, bus and auto flow to and from the interstate freeways that will create a pedestrian-unfriendly environment that dwarfs the impacts of other SLU Neighborhood arterials:

- Mercer Street volumes will be more than 4 times heavier than Denny Way's
- Mercer Street's city-designated status as a "Major Truck Street" will amplify the impacts of its high volume with a significant inclusion of heavy, diesel-powered trucks.
- It is clear by observation that, between Westlake and Fairview Avenues, Mercer is a virtual freeway on-off ramp where drivers' speeds and impatience contribute additional risks to pedestrian safety.

Clearly, no new significant impediments to Mercer vehicle flow can, or should, be imposed on behalf of pedestrian safety. The solution is to eliminate the deadly conflict by offering pedestrians a safe, accessible, and unimposing route over the torrent of Mercer Street traffic.

I recently attended the public meeting and presentation of the SLU Draft EIS, and attempted to engage the representative of the DEIS traffic consultant in a serious discussion about the Mercer/Pedestrian issue. His response was a round shrug of the shoulders and the assurance that the City Council will never approve a pedestrian bridge. He may, in fact, be right about the Council's final say in the matter, but DPD and your consultants must seriously assess the impending risk and prescribe your professional judgment of appropriate mitigation.

My hope is that both of us will be able to sleep well the night after the first infant stroller is mowed down in a Mercer Street crosswalk by an impatient driver.

Thanks for your consideration of the matter.

Respectfully,

Jim Waymire, Architect

Jim Russell Waymire  
Waymire Consulting  
(206) 779-1293  
[waymire.arch@comcast.net](mailto:waymire.arch@comcast.net)

**SLU - Mercer Street Crossing - Pedestrian Safety and Experience  
Please Get Serious about Safety Crossing Mercer.  
Consider 1 or 2 Accessible Enclosed Pedestrian Bridges**

April 7, 2011 - Waymire Consulting

**Current SLU Arterial Traffic Volume Comparisons:**

(from SLU Re-zone Draft EIS)

**Denny Way (east & west) 1,233 Vehicles**



**Westlake Avenue (north & south) 1,169 Vehicles**



**Fairview Avenue N (north & south) 1,186 Vehicles**



**Mercer/Valley Couplet (east & west) 5,301 Vehicles \***



Current Mercer St. Volume Component - 2,929 vehicles

\* Mercer and Valley Volumes soon to be combined on a 6-lane 2-way traffic Mercer Street. City consultants indicated "a trickle" of traffic will remain on Valley Street.

**Other Considerations:**

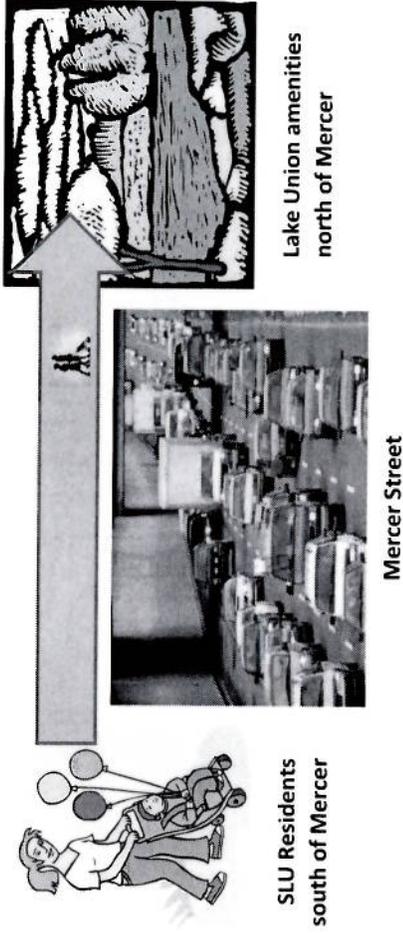
Shockingly, the proposed pedestrian improvements shown on page 29 of the SLU Urban Design Framework make no gesture at all to address the safety or experience of pedestrians wanting to cross the unique torrent of steel, speed, and pollution that is Mercer Street. The SLU DEIS is also blind to the problem.

Timing traffic lights to give residents (including the elderly, young, and disabled) appropriate frequency and duration to make safe (if intimidating) grade-level crossings will impede and frustrate commercial and private vehicle drivers trying to make their ways to and from the interstate freeway system.

Mercer's designation as a "Major Truck Street" gives the mix of high volume traffic an added level of incompatibility with a safe and positive pedestrian experience. The air quality issues associated with those heavy diesel powered vehicles also adds to the concerns for pedestrian safety.

Between Westlake and Fairview, Mercer Street is a "Virtual Freeway On-Off Ramp". Commercial and private vehicle speeds and drivers' behavior have little regard for traffic laws or common courteous behavior. East-bound rush-hour enforcement is impeded by drivers' escape to the actual uncontrolled freeway on-ramps.

Access to the Lake Union shoreline provided by the Galer Street Hillclimb and the connecting Westlake Avenue Pedestrian Bridge is a valued neighborhood asset, and was enthusiastically supported by the City of Seattle.



Mercer Street

Current Valley St. Volume Component - 2,372 vehicles

**CBRE**CB RICHARD ELLIS  
1420 Fifth Avenue  
Suite 1700  
Seattle, WA 98101-2384206 292 6013 Tel  
206 300 5866 Cell  
206 292 6033 FaxOwen.Rice@cbre.com  
www.cbre.com**Brandon G Weber**  
CB Richard Ellis, Inc  
Corporate Real EstateApril 8<sup>th</sup> 2011City of Seattle  
Department of Planning and Development  
700 Fifth Ave, Suite 2000  
Seattle, WA 98124-4019

Dear Mr. Holmes,

My partner Owen Rice and I work closely with many of the region's leading technology tenants. In fact, before I moved to CBRE, I personally worked at Microsoft for 6 years as a Program Manager on the Excel team and was one of those "tech tenants".

In studying technology user trends from the Seattle area and the Silicon Valley, it is unquestionably clear that these users strongly favor large floor plates of 35,000-40,000SF. It also appears that the Draft EIS for South Lake Union contemplates only 24,000SF floor plates for commercial office towers.

This mismatch is no doubt an oversight, and it is an important one to correct. 24,000SF floorplates would significantly limit technology company growth in South Lake Union and instead motivate them to look elsewhere to satisfy their space needs.

I would urge the City to evaluate the impact of the 35,000SF or even 40,000SF floor plates in the Final EIS so that the ultimate zoning that is put in place has the flexibility to address the needs of this very critical growth segment of our economy. I appreciate the opportunity to provide my feedback and look forward to an updated EIS that supports this incredibly area of Seattle.

Sincerely,



Brandon G. Weber

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**Holmes, Jim**

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**From:** Susanna Williams  
**Sent:** Thursday, March 10, 2011 5:09 PM  
**To:** DPD\_Planning\_Division  
**Subject:** Density in South Lake Union

I am writing in support of increasing the height restrictions in South Lake Union and allowing for greater density in this burgeoning neighborhood. Cities should feel dense, close, full. For Seattle to continue to be affordable for young people and middle income families, we **MUST** increase density and in a city with limited land, going up makes the most sense. Unlike other neighborhoods in Seattle, South Lake Union doesn't have blocks and blocks historically significant single family Craftsman homes. A former industrial area on the lake, it has long been home to businesses and industry. As Seattle evolves and prioritizes mixed use development, South Lake Union has the potential to become a model for other neighborhoods, showing how you can have all the "neighborhood" things that people love about living in Seattle in multi-family condo and apartment buildings.

South Lake Union is the most vibrant and exciting neighborhood in Seattle, poised to stretch downtown all the way to Lake Union, and ready to grow with workers who want to live close to their jobs, families who want to give their children a real urban experience, and a community that is forging strong bonds already amongst its pioneer "settlers". South Lake Union neighbors know each other. They do things together. They support their local businesses. This is the best of Seattle-- and it needs to keep growing.

Sincerely,  
Susanna Williams

Holmes, Jim

From: Wings, Linda D [winges@battelle.org]  
Sent: Monday, April 11, 2011 4:05 PM  
To: DPD\_Planning\_Division  
Subject: Comments on Draft EIS for SLU

I live in the Denny Triangle (2200 Westlake) and work in South Lake Union (Dexter and Aloha). My business will not be impacted by the proposed rezoning and increase in population. I write as a citizen who spends significant time in the SLU neighborhood. My primary concerns with the draft EIS are the sections on transportation, views, and shadows.

Transportation. My experience at 2200 Westlake is that residents do have cars (one or two per unit), and that while they may drive less than suburbanites, it is unrealistic to assume that half of the trips will be done by bike, walking or mass transit. What other city has those statistics? (Even cities with subway systems – for example, Washington DC and Boston – show that only 13-14% of workers commute by transit, so why would we expect that 23% of peak hour trips would be transit in SLU, served by one streetcar line and buses?).

Phase II of the Seattle Department of Transportation Transit Master Plan should be released at the end of this summer. It will be important to look at these results, and the growth assumptions used in the Transit Master Plan, to compare with the proposed options under the SLU EIS. The EIS compares four options but does not address the increase in transit, bike lanes, and pedestrian walkways needed to support the increase in residential and employment population from today’s level to any of the options.

The Mercer Mess – in existence when I moved to this area in 1981 – is about to be fixed. Let’s not create another transportation mess in its place. Let’s plan carefully – and realistically – for transportation before SLU is developed.

Views. One of Seattle’s best features is the outstanding views of mountains, water, and our iconic Space Needle. Planning should consider the importance of preserving some of these views for pedestrians walking in the downtown, Denny Triangle, Cascade, Belltown, and SLU neighborhoods. It is not enough to preserve partial views from a few hilltop locations. 2

Shadows. The EIS should have modeled the taller stacks occurring on the Valley side rather than the Mercer side, since the residential towers will be taller (not obligated to conform to FAR) and it is unlikely that the residential towers would be located on the busy Mercer side. Moving the taller stacks closer to the lake will cast more shadows over SLU park. We need to preserve the park in as much sunshine as Seattle receives, especially since the streets will be mostly shaded by the tall buildings. 3

Thank you for an opportunity to comment.

Sincerely,  
Linda Wings

CENTURY PACIFIC, L.P.

STEVEN L. WOOD  
MANAGING DIRECTOR

April 6, 2011

James Holmes  
Seattle Department of Planning and Development  
700 Fifth Avenue, Suite 1900  
PO Box 34019  
Seattle, WA 98124-4019

RE: Comment Letter  
South Lake Union Height and Density Alternatives Draft Environmental Impact  
Statement

Dear Mr. Holmes,

We are real estate advisors to the Seattle Times Company (STC). STC has been a property owner in South Lake Union for many decades. It owns over 7.5 acres of land in three large "super blocks" between Denny to the south, Harrison to the north, Boren to the west, and Fairview to the east. STC also leases some 155,000 square feet in the 1000 Denny Building located at Denny and Boren. There are over 850 STC employees located in South Lake Union. STC, as both a major employer and property owner, wishes to offer comments on the City's South Lake Union DEIS. Our comments are as follows:

Failure of DEIS to analyze whether an "incentive zoning" regime will satisfy comprehensive plan goals.

The DEIS, at 2.2.2, projects Comprehensive Plan growth targets allocable to South Lake Union. It also asserts at 3.8.7, 3.8.8, 3.8.9 and in other sections that the three (3) action alternatives would increase residential and employment density in South Lake Union and will meet these growth targets. The DEIS reaches this conclusion by assuming, at 3.10.5, that owners will utilize the zoning incentives to build to the maximum gross building area. We believe these conclusions are fundamentally flawed.

The three (3) action alternatives are not rezones, they are so-called "bonus height and density." This height and density is only available if the user pays the City of Seattle a significant fee or in the alternative provides "affordable housing." The DEIS blindly assumes, without analysis,

that developers/property owners will pay such a fee. There is no discussion of the reasonableness of the fee or its impact on developability.

1 cont

We believe the DEIS should analyze whether programs like this have been successful substitutes for rezones. While such a program exists in Seattle's downtown zone, it is hardly comparable since the base, height and density was far greater. Further, we're only aware of one example where the incentive zoning provision has actually been used in the downtown zone. Without this type of analysis, the proposed three (3) incentive zoning alternatives should be deeply discounted to reflect the fact that many developers may elect not to buy the additional density and, therefore, the assumptions about these alternatives accommodating projected growth are likely unfounded.

**The DEIS assumes that proposed development standards related to tower spacing, podium height and floor plate size will be applied to existing zoning.**

2

The DEIS is vague on the issue of whether development standards evaluated as part of the incentive zoning alternatives, would be applicable to the underlying zoning. The statement is made at 3.10.18 that "owners with properties of less than 22,000 sf would still have the option to develop projects to the standards of the underlying zoning." Does this mean that owners of properties in excess of 22,000 sf, who choose not to buy height or density from the City, would never-the-less be forced to utilize the development standards (tower spacing, podium height, maximum floor plates) developed for use with the incentive zoning alternatives?

We believe the imposition of the incentive zoning development standards on the underlying zoning would be potentially unfair and has not been evaluated from a SEPA standpoint. In many cases it would result in "downzone." Further, it puts the owner in the unenviable position of either being forced to "buy" zoning from the City or risk an effective downzone of its property. The DEIS needs to clear on what the development standards will be for the underlying zones.

**The existing South Lake Union zoning is not compliant with the City's Comprehensive Plan.**

3

The DEIS makes the assertion at 3.8.30 that Seattle's Land Use Code implements the goals and policies of the City's Comprehensive Plan. It fails to mention that the City amended its Comprehensive Plan in 2008 to eliminate the IC designation in South Lake Union. The City, in violation of a clear Growth Management Act mandate, has failed to conform its zoning to this change in the Comprehensive Plan.

The DEIS posits at Section 2.5 that the existing IC zone would be retained in the event the imposition of incentive zoning is delayed. We believe the City must take steps to conform the zoning for this area to the Comprehensive Plan regardless of what happens to its "incentive zoning" regime.

Development Standards developed in conjunction with Alternatives I, II, and III do not reflect property characteristics or market reality.

4

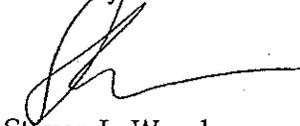
The Seattle Times parcels are "super blocks" of almost 2.5 acres per block (110,000 SF). These blocks have the capacity, given the small floor plates proposed, to accommodate three (3) and even four (4) towers per block. Even at three (3) towers, only a third of the block would be developed in a residential scenario. An arbitrary limitation of two (2) towers per block is untenable. Tower count should depend on property size, type of product, floor plate size and project design.

The limitation of floor plates to 10,500 sf and 24,000 sf for residential and office towers, respectively, do not reflect market or development realities. Technology and bio-technology users prefer 35,000 sf to 40,000 sf floor plates. These users have many choices from a location viewpoint and will locate elsewhere if South Lake Union does not meet their needs. The imposition of an arbitrary 24,000 sf floor plate, without regard to lot size, does not serve the neighborhood's interest. The DEIS should independently analyze whether the proposed floor plate limitations make sense from a development or market sense. We are not aware of any high-rise residential tower in Seattle with a floor plate of 10,500 sf or less.

We believe development standards should have the flexibility to respond to market and developer realities. For example, an office building with a larger floor plate, say 35,000 sf, may have a reduced height. Likewise, two 35,000 sf floor plates may work nicely on a 110,000 sf "super block," but not on an 85,000 sf normal block. When one considers that two (2) 35,000 sf floor plate buildings on a "super block" still leave almost an acre of open-space, the role of flexibility becomes apparent. Part of such flexibility could eliminate "podiums" where large floor plates are used.

Thank you for your consideration. We are available to answer any questions you may have in regard to our comments.

Sincerely,



Steven L. Wood  
Managing Director  
SLW/jlp

Cc: Jill Mackie  
Vice President, Public Affairs  
The Seattle Times

**King, Donna**

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**From:** Julianna D'Angelo Yamamoto [julianna.dangelo@gmail.com]  
**Sent:** Sunday, April 10, 2011 8:44 PM  
**To:** DPD\_Planning\_Division  
**Subject:** South Lake Union EIS

I work in South Lake Union but I also enjoy it for its restaurants and shops. It is my belief that the recent development in SLU has not only made the neighborhood safer, but it has also attracted more residents and businesses. More people equal a safer neighborhood and drive the economy of local and small businesses. The neighborhood is currently working towards these goals but it needs more flexibility in zoning to achieve them. I think the city should adopt Alternative 1, because it will bring more people to the neighborhood, keeping the businesses thriving and the area safer.

Thank you for your time,

Julianna Yamamoto

**King, Donna**

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**From:** Mike Yamamoto [mikeyy1133@gmail.com]  
**Sent:** Sunday, April 10, 2011 9:50 PM  
**To:** DPD\_Planning\_Division  
**Subject:** SLU EIS Comment

I serve clients located in the South Lake Union neighborhood and I also spend time there outside of work. I have enjoyed the new and livelier community as well as the greater selection of restaurants and shops while spending time there. I support the notion of more people and taller more efficient buildings as I believe they led to the great neighborhood SLU has become. The neighborhood needs more density and the flexibility of additional height to get there. Please consider doing the right thing for the future of this community. Limiting the growth potential of this neighborhood will have a negative impact on the surrounding neighborhoods and on Seattle as a whole.

Thank you,

Michael Yamamoto

Holmes, Jim

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**From:**  
**Sent:** Monday, April 11, 2011 1:06 PM  
**To:** DPD\_Planning\_Division  
**Subject:** south lake union rezone

to: Seattle DPD,

I would like to see Seattle develop a wonderful urban environment, and the growth of downtown to encompass more mixed use with an emphasis on residential development is an important part of that transformation. The alternative is clearly more sprawl on the urban fringe and more packing of multi-unit residential development in our traditional single family neighborhoods. If demand necessitates multi-unit residential development, why bastardize our existing neighborhoods with six-unit boxes when the more efficient solution is to build real highrise and create a vibrant residential urban center? I live in San Francisco for many years, and saw the South of Market district come alive with thousands of new residents in high rise buildings, with the accompanying retail and entertainment venues to support them. The transportation and related pollution benefits are well known. Taller towers with space inbetween them for views and sunlight to reach the streets is a proven successful urban form. It leaves more room for street level plazas and open space that pedestrians can enjoy. The current zoning will probably force developers to maximize area by filling up the entire site with boxy buildings. Why go halfway toward density, and discourage flexibility and quality design at the street level. Please support the zoning that allows the tallest options and most flexibility at the street, which also supports skylight view and plazas at the ground level, and our environmental goals.

Thank you,  
Gary Zak

Table 4-2

Responses to Public Comments Received During the Comment Period

Comment Number	Response
<b>Letter 195: Van Til, Steve</b>	
1	<b>Support Greatest Potential Height and Density.</b> The comment is noted.
2	<b>Increased Heights.</b> The comment is noted.
3	<b>Achieve Plan Goals.</b> The comment is noted.
<b>Letter 196: Vice, Jodie</b>	
1	<b>Support Alternative 1.</b> The comments are noted.
<b>Letter 197: Walker, Dewey</b>	
1	<b>Support Alternative 3.</b> The comment is noted.
<b>Letter 198: Warren, Robert P.</b>	
1	<b>Compromise Between Alternatives 3 and 4.</b> The comment is noted.
<b>Letter 199: Waymire, Jim</b>	
1	<b>Pedestrian Bridge.</b> The City of Seattle does not support any pedestrian bridges across Mercer Street as they were not incorporated as part of any adopted plans, such as the Pedestrian Mobility Plan, Bicycle Master Plan, or Mercer Way Corridor Plan.
<b>Letter 200: Weber, Brandon G.</b>	
1	<b>Floor Plate Size.</b> Beginning in late 2008 and continuing through 2009, the City worked with interested citizens and other stakeholders to define the alternatives to be studied in the EIS. Through this public process, the standard for commercial floor plate size was reduced from 35,000 sf to 24,000 sf. Please see the discussion of alternatives eliminated from consideration, Draft EIS Section 2.3.7. Conceivably, larger floor plate size may be appropriate in certain areas of the study area and localized study may be warranted.
<b>Letter 201: Williams, Susanna</b>	
1	<b>Support Height and Density.</b> The comment is noted.
<b>Letter 202: Wings, Linda D.</b>	
1	<b>Mode Split and the Seattle Transit Master Plan.</b> For response to comments regarding the MXD methodology, please see Letter 12, response to Comment 10, and Letter 13, response to Comments 58 and 93.  The Draft EIS identifies areas where more pedestrian and bicycle infrastructure

Comment Number	Response
	<p>is needed; however, implementation is not discussed in an EIS.</p> <p>For response to comments regarding the feasibility of transit mitigation, please see Letter 13, response to Comment 66.</p> <p>Given the timing of this Draft EIS, the findings from the Seattle Transit Master Plan could not be included, but they will be considered during the implementation process if the City proceeds with the height and density rezone.</p>
2	<p><b>Views.</b> The comment is noted. Please see the discussion of views in Final EIS Section 3.4.</p>
3	<p><b>Shadows.</b> The view analysis for Alternative 1 located the residential towers adjacent to Valley. The text has been clarified to note this distinction. Please see Final EIS Section 3.4.</p>
<p><b>Letter 203: Wood, Stephen</b></p>	
1	<p><b>Feasibility of Incentives.</b> As the commenter notes, the No Action Alternative assumes no changes to existing zoning designations, including the existing IC zone. The No Action alternative is an EIS SEPA requirement, but does not preclude the City from rezoning the IC zone to Seattle Mixed, as shown in the action alternatives.</p>
2	<p><b>Underlying Zoning.</b> Under all alternatives, the underlying Seattle Mixed zoning standards would remain in effect. Under the action alternatives, property owners who do not qualify for or elect to use incentive measures would follow the underlying SM zoning standards.</p>
3	<p><b>Industrial Commercial Zone.</b> Please see response to Comment 1 in this letter, above.</p>
4	<p><b>Development Standards.</b> The comment is noted. Beginning in late 2008 and continuing through 2009, the City worked with interested citizens and other stakeholders to define the alternatives to be studied in the EIS. Through this public process, the standard for commercial floor plate size was reduced from 35,000 sf to 24,000 sf. Please see the discussion of alternatives eliminated from consideration, Draft EIS Section 2.3.7. Conceivably, larger floor plate size may be appropriate in certain areas of the study area and localized study may be warranted.</p>
<p><b>Letter 204: Yamamoto, Julianna</b></p>	
1	<p><b>Support Alternative 1.</b> The comment is noted.</p>

Comment Number	Response
<b>Letter 205: Yamamoto, Mike</b>	
<b>1</b>	<b>Support Greater Height and Density.</b> The comment is noted.
<b>Letter 206: Zak, Gary</b>	
<b>1</b>	<b>Support Tallest Options and Most Flexibility.</b> The comment is noted.