

(Date)

Radcliffe Dacanay, Principal Planner
Seattle Department of Transportation
via e-mail

RE: Seattle Transportation Plan SEPA Scoping Comment Letter

Dear Mr. Dacanay,

The Seattle Planning Commission appreciates the opportunity to provide our scoping comments for the Seattle Transportation Plan (STP) State Environmental Policy Act (SEPA) Environmental Impact Statement (EIS). We offer our comments at this early stage of the planning process based on our broad understanding of the goals and objectives of this very important citywide transportation plan. The primary purpose of the Planning Commission's scoping comment letter is to ensure that SDOT is studying the appropriate alternatives and range of topics in the EIS. This is especially important as we recognize that the analyses, impacts, and mitigation measures identified in the EIS will be used in further planning actions.

We have heard from SDOT that the STP represents the City's commitment to building a transportation system that provides everyone with access to safe, efficient, and affordable options to reach places and opportunities throughout Seattle. We also understand that the STP will serve as an update to previous transportation master plans, as well as a replacement for the individual modal plans, and as such must ensure safe space and accessibility for people walking, biking, and taking transit and for freight. The Plan also is intended to guide the City toward meeting its goal of zero traffic deaths and serious injuries (Vision Zero), while also considering new mobility opportunities including e-scooters and e-bikes, people-oriented streets, use of the public right-of-way as shared spaces for activation, and the potential for automated vehicles. In addition, and perhaps most notably, the STP is intended to form the basis of the next multi-year transportation levy after the current nine-year levy expires in 2024.

For that reason, the Planning Commission is especially interested in seeing that development of the STP be closely aligned with the current, ongoing Major Update to the Comprehensive Plan. Estimates for transportation investments will depend on accurate growth alternatives and housing and jobs projections in the Major Update. These planning processes should ensure coordination between growth strategy alternatives from the Major Update and appropriate transportation investments identified in the STP to serve future land use development patterns.

Developing Appropriate Scenarios for Evaluation

The Planning Commission understands that the STP EIS will include three high-level conceptual alternatives, including a "No Action" alternative. The two action alternatives have been created to test approaches to increasing the number of low-emission trips people take in Seattle. Each alternative mixes two tools to do this: "mode shift" and "electrification."

The Planning Commission is concerned that the two alternative scenarios presented for analysis in the STP EIS appear to be disconnected from the growth scenarios being developed by the Office of Planning and Development (OPCD) for the Comprehensive Plan Major Update EIS. Those scenarios focus on future development patterns that, to varying degrees, put people and daily needs in closer proximity to each other so that the city can accommodate expected growth of population. Underlying those scenarios is acknowledgement that space in the city will need to be allocated increasingly to housing and moving people (as opposed to vehicles), and that current rates of car use and storage cannot be sustained in the context of future space constraints. The expected “mode shift” based on changed development patterns is also a key strategy toward reducing climate-harming emissions.

The STP scenarios, in contrast, appear to assume a future high rate of trip-making by privately owned vehicles, with the only variable being whether those vehicles are electric. While future electrification of the privately owned fleet is important, the truth is that the City’s transportation investments and policies will have very little effect on when and whether individuals will – or *can* – invest in buying electric vehicles. We appreciate the intention to evaluate scenarios relative to the City’s stated goals for reduction in greenhouse gas emissions. However, we are concerned that framing the scenarios based on reductions from conversion of private vehicles to electric will miss an opportunity to evaluate alternatives that the City has far more influence over, and that align with the forthcoming update to the Comprehensive Plan.

Rather than base the scenarios on electrification of private vehicles, the Planning Commission recommends developing two replacement alternatives based on the scale and nature of future “mode shift.” One scenario could be based on the continuation of the current growth strategy and land-use/development trends, but with transportation investments focused on faster and more frequent transit routes (using electric propulsion) and walking and biking connections to transit. A second scenario could be based on development patterns with many more complete, walkable neighborhoods around rail stations and throughout the city – akin to scenarios being developed by OPCD. The transportation investments for that scenario would be focused more on local-serving and nonmotorized trips. Such an approach and resulting analysis would have the benefit of informing both the STP and Comprehensive Plan Major Update, rather than running on a parallel track.

In any case, it would seem to be most realistic and instructive to develop scenarios based on packages of potential investments and associated policies, rather than on abstract assumptions about electrification of private vehicles and a “mode shift” that is dissociated from future growth patterns.

Centering Equity in the STP

Transportation is an essential service, especially for communities of color and those with disabilities, to access jobs and critical destinations like schools, health clinics, childcare, grocery stores, and other basic services. At the same time, our current transportation system is disproportionately harming those communities through traffic violence and degraded air quality. The Planning Commission is strongly committed to the principles of racial equity in the development of a multimodal transportation system and public space network that is designed for the most vulnerable populations. We strongly

recommend that equity should be incorporated throughout the EIS document and/or added as a distinct topic for separate analysis. Equity can be a framing lens for all topics studied in the EIS to understand the impacts of transportation decisions and investments.

Equity impacts should be measured and documented in all relevant chapters of the document. For example, expanding use of personally owned electric vehicles as assumed in the action alternatives only benefits those who can afford them, while doing nothing to increase public safety or allow increased use of the public right-of-way as shared spaces for people. In contrast, access to multiple transportation options, speed, reliability, and safety are equity issues for low-income populations. Analysis of mode shift in the action alternatives should consider all associated impacts, benefits, and appropriate mitigation measures through an equity lens. The STP scenarios should also consider equity impacts related to past, ongoing and future displacement. For example, people who have been displaced further out of Seattle may have little choice but to drive or make long and difficult transit commutes into the city. The EIS and STP planning process should incorporate tools including the Transportation Equity Framework and broadly evaluate additional equity measures to offer better transportation choices.

Elements to be Evaluated

SDOT has cited a number of worthy themes for the STP that should guide the evaluation of the conceptual alternatives in conjunction with the environmental elements noted in the SEPA checklist. It will be important to identify metrics that can shed light on these themes in particular:

- **Vision Zero.** Deaths and serious injuries on our roadways are an unacceptable by-product of our car-focused transportation system, and they are trending in the wrong direction. The Commission recommends that safety metrics, including the number, locations, and severity of crashes, the prevalence of vehicles, and projected speeds be considered paramount in evaluating scenarios and selecting a preferred alternative.
- **Climate action.** The analysis should consider both climate mitigation and adaptation. SDOT has adopted an intention to meet the City's stated goal to reduce greenhouse gas (GHG) emissions from vehicles by 82 percent and vehicle miles traveled by 20 percent by 2030 and zero net GHG emissions by 2050. As noted above, the EIS should focus on evaluating mitigation measures for emissions substantially within the City's control. Vehicle miles traveled is an important proxy, not just for emissions, but to assess the sum of effects of other actions taken and investments made to reduce vehicle dependency, including congestion and safety. Regarding mitigation of climate impacts – particularly increasing intense rainfall and flooding – the EIS should assess the potential for green stormwater infrastructure, tree canopy, and general greening of the rights-of-way for ameliorating those impacts.
- **Choice and convenience.** Metrics here include not only whether an option exists – to take transit, bike, walk, or roll – but also how much time it takes to make those trips. One of the greatest impediments to the “mode shift” SDOT seeks is the real and perceived time penalties associated with non-car trips. It will be critical to assess how investments and policies affect the duration of transit trips and the length of walking and biking trips needed to meet daily needs.

- **Affordability.** In an increasingly expensive city, the cost of transportation represents the second highest budgetary burden for most households. It's important to assess the degree to which the availability of safe, frequent, convenient, and accessible options reduces that burden for middle- and lower-income households.
- **Complete Streets.** SDOT describes this as a goal to “improve travel conditions for bicyclists, pedestrians, transit, and freight in a way that supports the surrounding community.” In reality, the metrics for the success of the City’s longstanding complete streets policy will be the number and connectedness of corridors – which can be broader than a single roadway – that successfully and safely accommodate the largest number and widest range of users of the street rights of way.
- **Anti-displacement.** The Commission applauds SDOT’s desire to “acknowledge transportation’s role in the displacement of vulnerable communities.” One hopes the STP will incorporate actions to repair that harm, as well. In terms of metrics to evaluate whether future investments and policies actively promote or reverse potential displacement, the planning process should evaluate affordability, as noted above, as well as whether and to what degree current and proposed facilities serve at-risk communities (as well as those passing through), protect them from harm, and improve accessibility.

Future-Oriented Analysis

The STP is intended to be a long-term plan for future transportation investments in Seattle. The Planning Commission understands that the majority of STP projects will be implemented over a 20-year period from 2024 through 2044. We strongly recommend that all the EIS alternatives and scenarios reflect transportation investments necessary to serve future population growth and land use patterns as anticipated by the Major Update to the Comprehensive Plan, while addressing climate change, eliminating roadway deaths and serious injuries, and improving livability. Right-of-way strategies should incentivize a shift away from and reduce subsidies for vehicle ownership and storage and toward shared spaces for activation and revenue generation. We also recognize the challenge of predicting future conditions and trends and incorporating them into the Plan. The Commission recommends that every alternative include sensitivity analysis to consider future trends such as automated connected vehicles and other new mobility scenarios.

The Planning Commission appreciates the opportunity to provide our scoping comments on the STP EIS. We look forward to following the ongoing planning process and providing additional input throughout development of the Plan. If you have any questions, please do not hesitate to contact Vanessa Murdock, Seattle Planning Commission Executive Director.

Sincerely,

Rick Mohler and Jamie Stroble
Co-Chairs, Seattle Planning Commission