



October 13, 2023

Radcliffe Dacanay, Principal Planner
Seattle Department of Transportation
SEPA comments on Seattle Transportation Plan Draft Environmental Impact Statement
via e-mail

Dear Mr. Dacanay,

The Seattle Planning Commission appreciates the opportunity to comment on the Seattle Transportation Plan (STP) Draft Environmental Impact Statement (DEIS). The Seattle Planning Commission is a 16-member independent, advisory body. We provide guidance and recommendations to the City of Seattle's Mayor and City Council, as well as City departments, on planning goals, policies, and plans for the physical development of the City. The Planning Commission is excited to see the shift toward prioritizing multimodal transportation in the draft Seattle Transportation Plan. We offer the following comments to help expand the environmental analysis and support the Seattle Department of Transportation (SDOT) in creating the best possible plan for transportation investments for Seattle. We have also provided comments on the Draft Seattle Transportation Plan, which can be found [here](#).

Praise for the Draft Environmental Impact Statement

The Planning Commission noted several components of the DEIS that we appreciate and offer gratitude for their inclusion. We are pleased to see that the DEIS details some of the adverse impacts of the no action alternative. The DEIS makes clear that taking no action or failing to implement the vision of the STP has consequences for the entire transportation system and the communities that system serves. It highlights the need to increase mobility for people and goods by reprioritizing the right-of-way to meet the goals identified in the STP and to avoid conflicts with the Comprehensive Plan's future growth strategy.

The Commission also appreciates the inclusion of the detailed Overview of Historical Planning and Transportation Decisions in the Land Use section of the DEIS. The overview provides an important context of the adverse impacts major planning and transportation projects have had and continue to have on racial equity in Seattle. We hope this context is held front of mind for all during the implementation of the plan.

Commissioners

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Vanessa Murdock
Executive Director

Olivia Baker
Policy Analyst

John Hoey,
Senior Policy Analyst

Robin Magonegil
Administrative Analyst

The Commission would also like to acknowledge that the DEIS is written in a clear and easy-to-follow format. The document includes helpful supporting tables and graphics such as:

- o Summary of Network Changes by Mode for Alternatives (2-78)
- o Pedestrian Network Gap map (3-306)
- o Exhibits 3-157 through 3-159 which map areas within ¼ mile of improvements for each alternative (3-381)

Areas for Additional Analysis

The Commission offers the following recommendations for additional analysis of the plan in the EIS to fully understand the impacts of the plan as drafted and to inform the selection of a preferred alternative.

Overall Recommendations

- *Include an additional overlay analysis for disproportionately impacted communities within sub-areas based on a race and social equity lens.*

We appreciate the use of sub-areas in the DEIS to provide deeper analysis, however, we think the sub-areas are still too high-level to understand impacts on specific communities. For example, the sub-area analysis glosses over sea-level rise impacts as non-significant because they will only impact one percent of transportation infrastructure, but that one percent is concentrated in areas like South Park, which will have a significant impact on industrial workers and residents in the area. Similarly, the air quality section notes the negative impacts to residential areas near highways but determines that building codes for better air filtration can make this a non-significant concern. The analysis fails to show the impacts to communities such as the elderly and low-income residents of the Chinatown International District who live near multiple highways and may not have access to improved air filtration.

We value the inclusion of the Transportation Equity Framework (TEF) in the Draft STP, however, we have concerns that the framework is too forward-looking to be used to assess impacts of the plan in the EIS. It is helpful to note that the TEF will be used to mitigate future impacts of the STP, but the EIS should look at the current transportation system's impact on the people in our city who rely on public transportation and experience the most harm from gaps and inadequacies. The EIS should assess how each alternative responds to existing conditions and issues. For example, the EIS should identify areas of the city where sidewalk gaps coincide with communities of color and a high number of pedestrian injuries, and how each alternative can address those gaps.

We recommend that the EIS include an additional overlay analysis that identifies impacts across each section based on overlapping factors of race, socioeconomic status, and a history of disinvestment and harm perpetuated by planning decisions. The analysis could look for impacts to the vulnerable communities identified in the STP or could utilize a financial lens to identify where monetary investments have been made geographically over the last 20 years and what areas of the city have not seen similar investment.

- *Study the impact of each alternative on affordability of travel for different modes.*

A key move of the STP is to “Provide reliable and affordable travel options that help people and goods get where they need to go” (1-10). One of the goals in the Lead with Transportation Justice section is to “ensure everyone can afford to take the trips they need to make” (1-9). The Commission wholly supports these goals and notes that affordability is not studied in the DEIS. The EIS should study the impact of each alternative on affordability for different modes.

- *Tie the EIS analysis to network buildout targets in the Seattle Transportation Plan.*

The Commission is concerned by the lack of clarity around how the vision and goals of the STP will be implemented. In our comment letter on the STP, we recommend that SDOT set targets for implementation at different intervals and commit to tracking progress toward those targets. The EIS should analyze the minimum level of system buildout for each alternative that is required to meet those targets and to avoid the significant and unavoidable impacts identified in the DEIS.

Land Use Recommendations

- *Conduct additional analysis once a preferred alternative is selected for the Comprehensive Plan to fully align transportation investments with the City’s growth strategy.*

The Commission appreciates the effort to compare the action alternatives of the STP DEIS to the growth strategy proposed in the Comprehensive Plan major update. We find it difficult, however, to fully evaluate the land use analysis for compatibility with the growth strategy without the draft Comprehensive Plan publicly available during the STP DEIS comment period. While we recognize the challenges of aligning these timelines, any study of the STP and its impacts is incomplete without a full comparison to the City’s growth strategy.

- *Clarify how SDOT will align transportation investments with community-specific displacement mitigation strategies.*

The DEIS notes that transportation infrastructure can play a role in displacement because it “can make neighborhoods more accessible and desirable, resulting in increased property values” and it can “significantly change the perceived value of a neighborhood resulting in higher housing costs or additional demolition or rehabilitation of existing homes” (3-282). Despite this acknowledgement, the DEIS states that due to the uncertainty around land use changes from the Comprehensive Plan, any identified impacts to displacement would be speculative and no significant adverse impacts are identified (3-283). The Commission looks forward to seeing how the final EIS identifies impacts related to displacement once the Comprehensive Plan is further defined and how SDOT and other City agencies will respond to those challenges. We commend the displacement mitigation strategies noted in the land use section (3-293) and fully support their implementation, as they are necessary.

- *Conduct additional analysis to identify possible impacts of organizing dense multifamily housing and multimodal transportation next to major arterial streets.*

The Commission is concerned by the potential conflicts between the Corridors vision of growth in the forthcoming Draft Comprehensive Plan (as referenced in the Comprehensive Plan EIS Scoping process)

and the high traffic volume planned for arterials in the STP. The City of Seattle has encouraged the placement of multifamily housing along major arterials like SR-99 and Rainier Ave S for decades and appears poised to further invest in this strategy with the upcoming growth strategy. The DEIS did study the impacts of noise from arterials on residential uses and indicates that several streets such as MLK Jr Way S and Roosevelt Way NE produce enough noise to be a nuisance to adjacent homes (3-157). The analysis should go further to assess potential impacts to air quality and public health when housing is located along busy arterials. Studies show that living, working, and playing within 500-800 feet of high traffic volume roads can lead to increased risk of health impacts such as asthma, cardiovascular disease, and compromised lung development in children.^{1,2} The City cannot continue to ignore these risks in its land use decisions.

The EIS should include analysis to identify impacts to air quality, public health, and safety of this combination of transportation infrastructure and land use. Furthermore, the EIS should suggest associated mitigation strategies. These actions will ensure that Seattle's proposed growth strategy and transportation plans are consistent with [King County Countywide Planning Policy H-24](#) that says Seattle must:

Plan for residential neighborhoods that protect and promote the health and well-being of residents by supporting equitable access to parks and open space, safe pedestrian and bicycle routes, clean air, soil and water, fresh and healthy foods, high-quality education from early learning through K-12, affordable and high-quality transit options and living wage jobs and by avoiding or mitigating exposure to environmental hazards and pollutants.³

Transportation Recommendations

- *Provide additional analysis of the benefits of prioritizing active travel and transit modes in the right-of-way.*

The Commission applauds SDOT for focusing on people and their use of the right-of-way in the STP and in the DEIS rather than focusing on vehicle level of service. We suggest the EIS provide more information on the benefits and impacts of reprioritization of street space. The data could be used to help paint the picture of how some modes may see reduced travel times in the short run, however, redistribution of the right-of-way will create a more reliable and convenient travel experience for all modes in the long run. To help tell this story, we recommend the EIS study:

- What are the impacts of each alternative on travel times for transit, walking, and biking?
Consider using a multimodal level of service model such as the one used in the following study:
[Multimodal Level of Service Analysis for Urban Streets](#).⁴
- What benefits of time and convenience will non-car travelers see as a result of each alternative?

¹ Office of Transportation and Air Quality. "Near Roadway Air Pollution and Health: Frequently Asked Questions." US Environmental Protection Agency, 2014. https://www.epa.gov/sites/default/files/2015-11/documents/420f14044_0.pdf

² Bae, Chang-Hee Christine, Gail Sandlin, Alon Bassok, and Sungyop Kim. "The Exposure of Disadvantaged Populations in Freeway Air-Pollution Sheds: A Case Study of the Seattle and Portland Regions." *Environment and Planning B: Planning and Design* 34, no. 1 (2007): 154–70. <https://doi.org/10.1068/b32124>.

³ King County. "2021 King County Countywide Planning Policies." 2021, 45. https://cdn.kingcounty.gov/-/media/king-county/depts/executive/performance-strategy-budget/regional-planning/cpps/2021_cpps-adopted_19384-amended_19553.pdf?rev=7ea6e59c9810495db4335e3b6b6d35e8&hash=F3190536F7D2C1A28BE15E62E82C42D9

⁴ Dowling, Richard G., National Research Council (U.S.), and National Cooperative Highway Research Program, eds. *Multimodal Level of Service Analysis for Urban Streets*. NCHRP Report 616. Washington, D.C: Transportation Research Board, 2008.

- What are the impacts of each alternative on Vision Zero goals and what are the costs of deaths and injuries from the no action alternative?
- What impacts and challenges arise from mode prioritization and the redistribution of space when space and or funding is constrained along a particular street?

Completing this picture will not only help make an informed decision regarding the preferred alternative but can also help to explain the benefits of the plan during the implementation stage.

- *Further explore the impacts of parking on the ability to implement each action alternative.*

Parking in the public right-of-way has consistently been noted by SDOT as a barrier to expanding access for other modes such as adding transit only lanes or bike lanes. We recommend further exploring how current parking policies will affect the ability to implement each of the alternatives. The City should also follow through on the suggested mitigation strategies of expanding parking management programs such as additional areas of paid parking and reworking the current Restricted Parking Zone (RPZ) program (3-398).

- *Provide additional details of estimated changes in Vehicle Miles Traveled (VMT) for each alternative.*

The Commission would like to see a more detailed analysis of how each alternative will impact the estimated VMT for the City with a breakdown of how those numbers are calculated. The estimates provided for alternatives two and three (3-104, 3-106) are both based on alternative five of the Comprehensive Plan Update, indicating that the same VMT is expected between alternative two and three despite very different levels of investment. Both estimates appear to be low compared to a 2022 GHG Inventory by the Office of Sustainability and Environment which estimated overall VMT for the city to be over 4 billion.⁵

Climate Change Recommendations

- *Study impacts on transit and active mobility users during extreme heat events and forest fire smoke events.*

The Commission appreciates that the DEIS covers a detailed evaluation of the impacts of sea level rise and potential for greenhouse gas (GHG) emissions reduction in the STP. The EIS should look at additional potential impacts of climate change such as extreme heat and forest fires on users of the transportation system and identify mitigation strategies. For example, how will an increase in frequency of extreme heat events impact transit users who must wait outside at transit stops?

- *Study the impact of extreme heat events and other environment-related emergencies, such as major earthquakes, on the City's transportation infrastructure.*

In addition to studying the impacts of extreme heat events on users of the transportation system, the EIS should study potential impacts of such events on transportation infrastructure. We know that extreme heat has the potential to damage roads and temporarily shut down transit lines. Is Seattle's transportation system prepared to respond to damage or service interruptions due to major heat events? Who will be most

⁵ Seattle Office of Sustainability and Environment. "2020 Community Greenhouse Gas Emissions Inventory Seattle." City of Seattle, 2022, 58.

https://www.seattle.gov/documents/Departments/OSE/ClimateDocs/GHG%20Inventory/2020_GHG_Inventory_Oct_2022.pdf

impacted by such interruptions and what are potential solutions to avoid serious impacts? The EIS should explore these questions.

Similarly, we note that the DEIS does not discuss emergency preparedness and the system's ability to respond to other environment-related events such as a major earthquake. If a natural disaster damages vital infrastructure, such as bridges or highways, does the system have enough alternatives for key services to continue? Although we did not suggest the EIS study emergency preparedness in our comments during the scoping process, we recommend the EIS study how each alternative supports the transportation system's ability to respond to natural disasters and major climate events.

- *Study the impact of paving materials and other impervious surfaces on urban heat island effect. Identify potential solutions such as alternative materials.*

The Commission also recommends that the EIS study the impacts of transportation infrastructure on urban heat. We know that areas with high concentrations of paved roads, parking lots, and buildings can hold more heat than less developed areas, causing higher overall temperatures in what is known as a heat island.⁶ The heat island effect has the potential to make extreme heat events even more severe for communities that live in or near these heat islands. The STP acknowledges that heat islands are an issue in Seattle and identifies increasing the City's tree canopy as a possible solution. We recommend looking at additional mitigation strategies for reducing the heat island effect including, for example, exploring the use of different paving materials.

Air Quality Recommendations

- *Study impacts to users when active travel modes, community & mobility hubs, and housing are placed alongside polluting travel modes.*

The Commission recommends that the EIS explore the impacts to users of transportation infrastructure intended for pedestrians and bicyclists when that infrastructure is located alongside or nearby high-pollution infrastructure like highways and major arterials. For example, what are the air quality impacts and related public health risks for users of a multipurpose trail that runs alongside a multilane arterial? As the STP includes plans to create many new miles of infrastructure for active mobility as well as community & mobility hubs, it will be important to understand the impacts of locating those uses near highways and arterials and to identify strategies to reduce impacts. Additionally, as noted above in the land use recommendations section, the EIS should study the impacts to air quality for other uses, such as housing, when located adjacent to high-traffic volume roads.

General Comments

With the final growth strategy for the Comprehensive Plan update unclear, the City should pursue the most aggressive implementation of the STP in order to avoid the transportation plan becoming a limiting factor

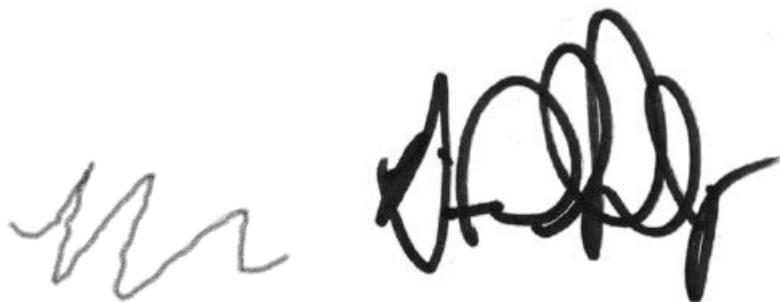
⁶ US EPA, OAR. "Learn About Heat Islands." Overviews and Factsheets, June 17, 2014. <https://www.epa.gov/heatislands/learn-about-heat-islands>.

in the growth strategy selected for the Comprehensive Plan. Given the climate crisis we all face and the City's anticipated growth, a robust transportation plan is the only reasonable option to pursue.

The Commission noticed a few uncommon and undefined terms such as Super Slow Streets (2-78) or concepts like community & mobility hubs that are used in the STP, but not defined anywhere in the DEIS. The EIS would benefit from the addition of a glossary or more consistent definitions when conceptual or technical terms are used.

We appreciate the opportunity to provide our comments on the DEIS for the Seattle Transportation Plan. We look forward to seeing the additional analysis included in the final EIS and we are excited to see the evolution of the STP in this new phase of transportation for Seattle. If you have any questions, please do not hesitate to contact Vanessa Murdock, Seattle Planning Commission Executive Director.

Sincerely,

The image shows two handwritten signatures side-by-side. The signature on the left is in grey ink and appears to be "McCaela Daffern". The signature on the right is in black ink and appears to be "David Goldberg".

McCaela Daffern and David Goldberg
Co-Chairs, Seattle Planning Commission

Cc: Mayor Bruce Harrell
Seattle City Councilmembers
Adiam Emery, Office of the Mayor
Tracy Krawczyk, Jonathan Lewis, Joanna Valencia; Seattle Department of Transportation
Rico Quirindongo, Lauren Flemister, Michael Hubner; Office of Planning and Community Development