



City Neighborhood Council

December 6, 2013

Seattle Department of Planning and Development
Attn: Gordon Clowers
700 Fifth Avenue, Suite 2000
Seattle, WA 98124-4019

Re: Comprehensive Plan Update EIS Scoping Comments

Dear Mr. Clowers:

The City Neighborhood Council is pleased that DPD plans to prepare an Environmental Impact Statement for the 2015 Comprehensive Plan update. Based on our review of the SEPA checklist, and related documents we offer the following initial comments for scoping.

1. The three alternatives described for analysis are too narrowly defined and all focus on one growth scenario - 70,000 housing units and 115,000 new jobs. The EIS should evaluate a wider range of growth scenarios and compare the environmental and socio-economic impacts of at least a low, mid and high estimate of growth. The EIS should illustrate by subareas within the city where the capacity exists under current zoning and policies to meet different growth scenarios. This will help focus on potential policy changes to better balance high and low growth areas in the city.
2. The alternatives need to have more detail in order to sufficiently identify environmental impacts at the subareas and neighborhood levels. The scoping process should identify impacts to be measured at a "local" level rather than citywide. For example, transportation and traffic impacts need to be measured using more fine tuned instruments than screenlines at city limits. Similarly, the impacts of potential zoning changes and growth targets to effect the "transit communities" policy should be identified at the subarea and neighborhood level both inside and outside urban village boundaries. Assumptions about actual transit levels of service and metrics about the experience of regular transit riders needs to be clearly articulated in the EIS.
3. The effects of suggested or hinted-at rewrites of the current body of policies are not mentioned in the checklist. The scope of work appears focused on only accommodating one speculative level of growth, but not analyzing the compatibility of that growth with meeting the many other values and goals expressed in the Seattle Comprehensive Plan such as access to open space and recreation facilities, personal mobility, neighborhood character and historic preservation, tree canopy expansion, stormwater management, access to good schools, industrial jobs preservation, responsive police, fire and emergency medical services among others.

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4. We request that the EIS include socio-economic impact assessments as well as looking at the other elements of the environment. The document should evaluate capacity to finance capital improvements needed to accommodate growth via utility rate increases, other taxes, fees, bond measures, etc.

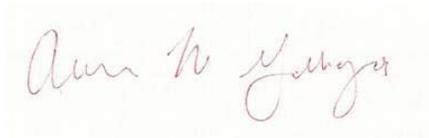
5. We request that the scoping document provide some historical context for establishing the stated 70,000 households and 115,000 jobs targets and translate these numbers into more detail about population demographics, and types of jobs. An explanation of how this target was arrived at and how it compares to targets for other growth centers in the region is needed to establish this context. The EIS should evaluate the impacts of what appears to be a continuation of a housing/jobs imbalance that has characterized growth trends in Seattle since 2004.

This matter was discussed at the CNC's November 25th meeting where this letter was authorized.

Sincerely,



Laine Ross
CNC Co-Chair



Alexis Gallegos
CNC Co-Chair

Irene Wall, Cindi Barker
Co-Chairs
CNC Neighborhood Planning Committee

C: City Council
Diane Sugimura, DPD
Tom Hauger, DPD