

SUMMARY OF COMPREHENSIVE PLAN EIS SCOPE STATUS: OUTCOME OF PUBLIC SCOPE PROCESS

Introduction

In October 2013, the Department of Planning and Development (DPD) issued a Determination of Significance (DS) for the Comprehensive Plan update, meaning an Environmental Impact Statement (EIS) must be prepared. At the same time, DPD commenced an expanded scoping period in order to employ a variety of strategies to gain public input about which environmental elements should be studied in the scope of the EIS.

For this “non-project action” (the adoption of an amended plan), the scoping period was lengthy because staff were developing the action’s alternatives and other content about the plan update, and still are. The time taken allowed for a variety of public meetings and forums and written comments for staff to share the contents, status, and planning concepts informing the Comprehensive Plan update. This ultimately generated a good deal of public input, much of it in the latter part of the scoping period; the public written comment period about the EIS scope closed on April 21, 2014.

The EIS will be written with a programmatic level analysis that will reflect the level of detail at which the plan update content and growth alternatives’ implications can be known at this time (see SMC 25.05.442). It will provide information at a level useful to decision-makers to understand the comparative environmental impact implications of the changes contained in the alternatives and related plan update. It will be written to comport with the guidance about EISs provided by state and local policies relevant to the State Environmental Policy Act (SEPA).

The purpose of this memo is to briefly summarize the outcome of the expanded EIS scoping period, in terms of choices DPD has made to amend or affirm the contents of the EIS Scope. This by necessity includes approximations and summary level comments about the input received and its degree of informativeness toward making judgments about the EIS Scope.

Natural Environment: Earth, Water Quality

Relatively few commenters addressed the natural environmental topics of earth and water impacts. Those that did comment about EIS scoping matters on the natural environment were fairly persuasive about addressing the relationship of future growth to earth critical areas – where there are landslide, erosion or seismic hazards – and in relating the potential for water quality impacts due to added growth-related runoff pollutants on natural drainage systems, water quality, and in receiving water bodies such as Puget Sound and Lake Washington. In relation to this latter topic, the Utilities scope had already anticipated similar topics.

Effect on the EIS Scope: For these elements that were previously considered by DPD staff to be perhaps unnecessary for discussion in this EIS, DPD agrees with the general direction of the public input’s advice to include Earth and Water Quality as new elements in the amended scope. These are worded to focus on the potential for impacts that relate specifically to earth critical areas, and to water quality impacts. For the latter, this content may be folded into and/or related to the Utility impact analysis. All such analysis will be conducted at an appropriate programmatic level.

Natural Environment: Air Quality, Climate, Noise

Air quality, climate and noise received relatively few comments, primarily agreeing with the need for study. One commenter suggested analyzing noise from highways and airplanes. The Port of Seattle agreed regarding the need for a noise and air quality study, but also suggested that noise and air quality relationships between residential land uses and port and industrial uses should be studied.

Effect on the EIS Scope: Port/industrial/residential land use relationships and health relationships are acknowledged and may be mentioned as a distinct type of condition in land use, noise and air quality analysis for this EIS. Port land use activities will also be acknowledged in the land use section of the EIS.

Land Use: Including Height/Bulk/Scale Compatibility, Aesthetics

Numerous commenters gave input about the Comprehensive Plan's draft growth alternatives, how growth planning and its analysis should occur, advocating additional alternatives such as one that better addresses bus transit as an influence on growth strategies, expressing preferences about zoning limits, and concerns or interests about what the implications of growth strategies could be (more or fewer tall buildings, effect on small business district character, etc.). Several commenters say that the objectives should include avoiding growth patterns that overwhelm neighborhoods, and wonder about the City's strategies to promote good outcomes. The Port of Seattle's comments about land use conflicts with residential uses are acknowledged and will be mentioned in this section.

The diversity of individual interests expressed in the comments about growth, growth strategies and implications for neighborhoods is helpful as planning input for the Comprehensive Plan update, and for being mindful about the perceived range of potential impacts of growth. This has contributed to the decision to add another growth alternative to the EIS (See the "Definition of EIS/Growth Alternatives" discussion later in this memo).

The range of public commentary only occasionally touched directly on EIS topics relating to land use compatibility and issues of height/bulk/ scale, such as preference to retain pedestrian scale in future developments, and favor for retaining view corridors and avoiding excessive shading of public spaces. Some commentary about alternatives also included rationales that expressed preferences for low-rise building scale in certain places such as urban villages, to retain compatible conditions. Also see the other land use section discussions below.

Effect on EIS Scope: This section of the EIS is appropriately scoped and worded to encompass a broad range of land use topics at a programmatic level. A good deal of the public's interests in growth alternatives, manner of future growth, and implications of growth on urban centers and urban villages may be satisfied by discussions and analyses that will be present throughout the EIS, as it portrays and evaluates the growth alternatives. They may also be addressed by virtue of the range of changes to the Comprehensive Plan's wording that will be proposed. However, no substantive changes were made to this part of the EIS scope.

Land Use: Relationship to Plans and Policies

See the above summary of comments relating to land use. Land use/relationship to plans and policies received relatively few direct comments about what should be included in the EIS scope. Some of these were from the Port of Seattle, seeking analyses of the Manufacturing and Industrial Centers (MICs), the

Industrial Commercial zones, and the potential removal of the Stadium Transition Area Overlay from the Greater Duwamish MIC. As well, the City Neighborhood Council's (CNC) comments requested essentially that the proposed amendments and growth policies that will be included in the Comprehensive Plan update should be reviewed against the other values and goals represented in the Comprehensive Plan.

Effect on EIS Scope: Drawn from the breadth of comments made, a list of additional specific plans and policies were identified to discuss in this section and/or in the Transportation section. These relate to comments that cited tree canopy objectives, and interest in pedestrian, transit, bicycling, safety, and freight needs. Relationships to capital improvement planning and shoreline master program also make sense as add-on topics given the span of comments on planning for future infrastructure improvements, and in relation to the comments received on the water-related topics. They are added to the EIS scope as follows:

- Urban Forest Stewardship Plan (e.g. addressing tree canopy preservation and restoration)
- Shoreline Master Program
- Capital Improvement Program
- Transportation Strategic Plan
- Seattle Transit Master Plan
- Seattle Pedestrian Master Plan
- Seattle Bicycle Master Plan
- Seattle Freight Mobility Action Plan

With regard to the Port of Seattle's topics of interest: the MIC analysis topic will be addressed as noted in the Housing/Population/Employment section below; and both the IC zone and Stadium Transition Area Overlay topics were already analyzed in the SEPA determination for the 2013 amendment cycle.

Regarding the CNC's request that future growth policies and policy amendments in the Comprehensive Plan be reviewed against the other values and goals in the Comprehensive Plan, the EIS scope already reflects that thought in the following: "Consultant will review and discuss the impacts and consistency of the alternatives' contents with respect to the Seattle Comprehensive Plan's focus, direction and major objectives."

Land Use: Housing, Population, Employment

See the above summary of comments relating to land use. Numerous comments addressed wide-ranging opinions about the alternatives and growth strategies, many expressing preliminary opinions about which alternative would be preferable. Many comments were also concerned about the implications of growth upon existing neighborhoods, and several also addressed topics relating to affordable housing and the implications for the future demographics of the city. Several comments also suggested that the City should pursue policies that would result in better management of the future growth, to avoid potential impacts of too much growth in any particular neighborhood. In addition, several comments addressed topics relating to ethnic diversity, social, and economic equity interests, some in relation to the potential for gentrification (see discussion later in this memo).

A few commenters requested more information about the justifications for the growth assumptions being made, and details such as whether the numbers are accurate and/or have to be accepted for

future growth planning purposes. A few commenters, such as the CNC, advocated for analyzing different growth scenarios, such as at low, mid- and high levels. A few commenters provided thoughts about how the EIS should be analyzing growth and housing questions.

The Port of Seattle's comments encourage recognition of the Port and industrial sector's jobs and economic contributions. This and related topics, such as freight mobility, represent the intersections of land use, transportation and economic development policies. These should be acknowledged and reviewed at a programmatic level in the EIS, to the degree that there could be Comprehensive Plan implications for the economy and employment.

Effect on EIS Scope: The range of comments on these topics illustrates the public's interests in the many demographic implications of future growth that pertain to where people live and work, and future prospects for a diversity of households to continue to be able to find housing and work and live in an affordable manner. This will vary across the growth alternatives that will be studied in this EIS.

While commenters' input and questions about the growth scenario details and justifications are acknowledged as helpful input to the comprehensive planning staff's work in defining the scenarios, they do not necessitate changes in the EIS scope. Likewise, the EIS approach is oriented toward analyzing worst-case impacts at a programmatic citywide level – which discourages the inclusion of lesser-growth scenarios. The scope also will not require variations covering numerous “what-if” scenarios of future growth excessively concentrated in particular neighborhoods (see SMC 25.05.442 and .448).

The Scope has been amended so that the employment-related implications of land use and freight policies, similar to the Port's requests for analysis, will be discussed.

Transportation, Parking

Transportation systems play an important role in the city and in its Comprehensive Plan growth alternatives. Numerous comments addressed preferences or pros/cons of the growth alternatives, in relation to how they would interface with the transportation system and neighborhoods or sectors of the city. This type of land use/transportation topic will be addressed in the EIS through the final definition and analysis of the four growth alternatives.

Despite the importance of this element, only a limited number of comments directly relate to the EIS transportation scope. Some comments endorse the need for various kinds of transportation details to be addressed – bicycles, parking, transit, pedestrian safety. A few other comments suggest that the EIS should strive to address impacts in greater detail, to the neighborhood and subarea level with tools or measures that communicate the impacts better than past “screenline” analyses. A few comments request that indications be given about what assumptions will be made about the EIS modeling's relationship to particular projects or planning efforts such as light rail expansion to Ballard, or freight related study efforts.

Effect on EIS Scope: The EIS scope is appropriately defined and indicates a reasonably detailed yet programmatic study of the various components of transportation. It suggests a level of subarea analysis from which it will be possible to draw reasonable conclusions about impacts in the most affected subareas and growth vicinities. This should exceed the level of analysis provided by past screenline level analyses. The scope has been amended to have the consultant explain whether assumptions are made specifically

about certain future planning projects or endeavors, and/or to ensure they sufficiently explain what the input assumptions are.

Public Services: Parks/Recreation, Fire, Police, Schools, Other

The range of comments on public services focused primarily on those seeking provision of essential services/amenities such as parks and recreational amenities and schools in a timely manner to address impacts of growth. A portion of the comments also extended their expectations to utilities and a few other public services that would also be affected by future growth. (Several commenters advocate the use of strategies such as impact fees.) A lesser number of commenters sought more specific assessment of the fiscal ability of the City to pay for the anticipated extent of added public service needs that may occur with future growth. A few unique comments recommended the inclusion of “public health” services impacts, impact on off-leash dog areas and animal control, and broadband communications utilities.

Effect on the EIS Scope: The EIS scope is drafted appropriately to accommodate a programmatic level of analysis suited to the Comprehensive Plan alternatives. This, along with functional plan updates in the Comprehensive Plan, will include consideration of how the projected service needs can be satisfied in a timely manner under the varying alternatives. Therefore, the scope already encompasses analysis of service provisions adequately and does not need to be amended to address these matters. While the fiscal ability of the City to provide future improvements is an interest that may be qualitatively discussed in the public services and utilities sections, a quantitative fiscal analysis will not be required for this EIS, and neither will topics such as monetary cost-benefit analyses and methods of taxation or financing improvements related to proposals (see SMC 25.05.440, .442, .448, and .450). This memo does not comment further on relationship of the Comprehensive Plan to the Growth Management Act (GMA), because it retains a focus on summarizing EIS scoping outcomes.

DPD notes the unique topics relating to broadband, public health services, animal control and animal recreation, and, which fall into SEPA categories of communications, other governmental services, and parks/recreation. While future growth will affect demands for these services, in DPD’s judgment a compelling reason was not expressed why the City should expect “more than a moderate” adverse impact potential in these services. Future service levels may be affected by numerous factors that are hard to predict. For example, will these services’ provision continue to occur similar to current funding practices? Will the future bring different sorts of funding practices or service delivery strategies? To what degree are ‘public health’ services also provided by private non-profit parties, and what range of such health services was meant by the commenters? In the case of communications networks, what will the future hold for broadband technology and what sort of market-based trends might affect the long-term demand and supply for broadband networks? Availability of public health services and effects on off-leash areas as recreational facilities may be mentioned within social equity analyses to be included in an appendix to this EIS, and in park/recreation impact analyses, respectively. However, the EIS scope does not warrant modification regarding these topics.

Utilities: Water, Sewer, Electrical, Other

Similar to the discussion of public services above, there is a common expectation that the City will plan for future infrastructure improvements across the city in ways that will provide the systems necessary to serve residents in a timely fashion. Commenters cited a desire to have future development pay for new

needed infrastructure through strategies such as impact fees. A few comments endorsed discussion of green stormwater infrastructure.

Effect on the EIS Scope: Conclusions are similar to the Public Services category above. The Utilities analyses are relatively comparable to each other, more so than the varying types of Public Services. Yet within each of the utilities to be studied are nuances relating to the existing systems, the requirements for future development, and the manner in which the systems can expand. The EIS scope appropriately accommodates a programmatic level of utility impact analysis that is suited to exploring big-picture impacts in relation to the Comprehensive Plan alternatives. The EIS, and/or technical analyses for the Comprehensive Plan, will include consideration of how the projected service needs can be satisfied in a timely manner under the varying alternatives. It may also be accompanied by water quality-related analysis that has been included as a new element in this amended scope, described earlier in this memo.

Definition of EIS/Growth Alternatives

In response to staff's work and to the extensive input gathered in public comments about the alternatives, the alternatives to the EIS are being adjusted slightly to include a new Alternative 4, and to clarify that the Alternative 2 represents the No Action alternative. The broad theming of the alternatives will be as follows:

- Alternative 1 – Urban Center Focus
- Alternative 2 – No Action / Urban Village Focus
- Alternative 3 – Light Rail focus
- Alternative 4 – Transit Focus (Adding to Alternative 3 concepts an additional emphasis on existing villages with very good bus service)

Other Planning Topics

Race, Social Justice, Social Equity

Several comments expressed in public forums and letters on the scope expressed interest in an analysis of race, social justice and social equity relating to the Comprehensive Plan update. These included interests in topics such as how the city will grow in a manner that equitably encourages and accommodates households of all socioeconomic strata, that provides services equitably throughout the city, that provides services to address social, educational and personal development needs of all households, and that provides for greater ethnic and social justice and equity.

Effect on EIS Scope: This wide-ranging topic is a kind of social policy analysis that falls outside of the conventional range of SEPA environmental review (see SMC 25.05.448), but is acknowledged as an important topic to consider in comprehensive planning. As a way to include discussion about implications and possible forward-looking strategies, DPD will include a discussion about this topic in an appendix as “additional information” that is not within the purview of SEPA.

The preparation and evaluation of sufficiency of this section will be performed outside the context of SEPA provisions, although formats from NEPA examples or content from other jurisdictions may be used to inform the development of this analysis. Per SMC 25.05.440.G and WAC 197-11-400(8), “the decision whether to include such information and the adequacy of such additional analysis shall not be used in determining whether an EIS meets the requirements of SEPA.”