

December 17, 2007

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From: Jackson Place Community Council
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RE: Livable South Downtown Draft EIS

I am writing in regards to the Livable South Downtown Draft EIS and in particular to address potential impacts to the Jackson Place Community (JPC). As you know, a portion of JPC (the east side of Rainier Ave. S. corridor) is included in the planning area.

We submitted comments on preliminary land use recommendations in April 2006 and on the scope of the EIS in June 2006 and received no response to either letter; we did request a specific response. At a minimum, a general response to public comment topics would help us understand City positions and would show that the City, in fact, is considering our concerns. Along these lines, the public information on the Livable South Downtown web page is out of date (showing Final EIS to be completed in Spring 2007, etc.) making it difficult for the public to follow and meaningfully participate in the EIS and broader planning process.

In light of the above, we ask that you please consider the following comments and expand the EIS analysis before recommending an alternative.

As we stated in previous letters, the geographic area of analysis in the EIS should include adjacent neighborhoods that would experience impacts associated with proposed zoning changes in the South Downtown study area. Our letter of April 13, 2006 discusses the reasoning behind this comment in detail. Seattle's SEPA code (25.05) requires that indirect, direct and cumulative impacts be analyzed.

The draft transportation analysis is inadequate at this time, as follows.

- The transportation analyses should consider the major current and planned development on S. Jackson St., Hiawatha Ave. S. and other areas immediately adjacent to the study area (Appendix G does not consider developments outside of the planning area). As stated in previous letters, these projects – in addition to the action alternatives evaluated

in the Draft EIS – will contribute cumulatively to transportation impacts. As such, the transportation analysis underestimates 2030 impacts.

- Level of Service F traffic conditions on Dearborn, Rainier and Jackson cannot be mitigated by the possible strategies identified, as is confirmed in the summary of unavoidable adverse impacts. Associated cut-through traffic and parking issues in adjacent residential neighborhoods must be addressed in the Draft EIS, mitigated and otherwise recognized in the summary of unavoidable adverse impacts.
- Where non-City agencies are expected to be responsible for fulfilling mitigation measures/strategies (such as King County Metro for ‘local bus frequency and span of service’), we do not see a discussion of how the City plans to seek commitments or agreements related to such requirements. Our previous letters address this issue.

The discussion of air quality mitigation measures should be reconsidered and expanded. The current discussion only addresses the exposure of new residents to air pollutants. The analysis should also consider how higher density developments and increased traffic in South Downtown may contribute to air pollution and what requirements should be in place to reduce such impacts, such as green roofs/tree planting, transportation mitigation measures (associated with air pollution specifically), and energy efficiency (as related to air pollution).

Cumulative impacts do not appear to be evaluated in the Draft EIS. In general, the impacts discussion seems to be undertaken in a vacuum – without consideration of current development or development activity in adjacent areas. Cumulative impact analysis within and adjacent to the South Downtown planning area should be a high priority in the EIS as there is no other mechanism (outside of the SEPA process) in which cumulative impacts are analyzed. Without an analysis of cumulative impacts, it is inappropriate to allow individual projects to rely on the Livable South Downtown programmatic EIS to meet transportation SEPA requirements, in particular, in the future.

Thank you for your consideration of noise, fire/police protection, and parks/recreation as part of the Draft EIS. We also appreciate your consideration of height, bulk and scale issues associated with potential height changes in Little Saigon and the western edge of Jackson Place. We are still concerned about shadows, light and glare associated with the potential height increases; please let us know how these issues will be addressed.

On another note, JPC is a member of the Dearborn Street Coalition for Livable Neighborhoods. We are concerned about the current proposal for redevelopment of the Goodwill site and suspect that the proposal (a regional shopping mall) is inconsistent with the zoning that is evaluated under all action alternatives in the EIS. Please see <http://dearbornstreetcoalition.org> for more information about our concerns. As stated in previous letters, the developer’s proposed rezone for the Goodwill site should be specifically evaluated as part of the South Downtown planning process, considering the potential significant effects within the planning area and in residential neighborhoods adjacent to the planning area.

Thanks again for your attention to this important area of the City. We hope you will consider our concerns. We would appreciate a response or a discussion with you.