



**Environmental Impact Statement –
Summary of the Public Scoping Process**

**YESLER TERRACE
REDEVELOPMENT**

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**Prepared for:
SEATTLE HOUSING AUTHORITY AND
CITY OF SEATTLE HUMAN SERVICES DEPARTMENT**

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Introduction

The purpose of this document is to summarize the comments received during the SEPA/NEPA scoping period and to update the SEPA/NEPA scope based on comments received during the scoping period. The SEPA Determination of Significance (DS) and NEPA Notice of Intent (NOI) was published on April 1, 2010 with an extended 45-day comment period (compared with the standard 21-day comment period as stipulated in WAC 197-11-410). The DS/NOI preliminarily identified the following elements of the environment for analysis in the Draft EIS:

- Earth
- Air Quality
- Water Resources
- Plants and Animals
- Energy – Climate Change and Greenhouse Gas Emissions
- Environmental Health
- Noise
- Land Use
- Relationship to Plans, Policies and Regulations
- Aesthetics/Light and Glare/Shadows
- Historic and Cultural Resources
- Transportation
- Public Services
- Public Utilities
- Socioeconomics/Environmental Justice

Seventeen comment letters were received from individuals and agencies during the scoping period, and three individuals commented orally during the public scoping meeting held on April 29, 2010.

This document contains an overview of the Yesler Terrace Redevelopment project, a detailed summary of the EIS scoping process, a summary of the comments received during the scoping comment period, and any revisions to the EIS scope based on public input received through the scoping process. Attachment A provides a matrix of scoping comments received with notations regarding how, or if, the comment is reflected in the EIS scope. Attachment B includes the public notice documentation.

Project Overview

Assumed redevelopment of Yesler Terrace would include replacement of all existing extremely low-income housing units, as well as supporting infrastructure, including improved streets and utilities, and new parks and open space. Preliminary concepts call for a range of land uses, including: 3,000 to 5,000 residential units, 800,000 to 1.2 million square feet of office space, and 40,000 to 88,000 square feet of retail space.

The Proposed Actions to be analyzed in the Yesler Terrace EIS include:

- Approval of City of Seattle zoning changes that would be necessary in order to accommodate the mixed-use redevelopment, including a Land Use code text amendment/rezone, and possible Comprehensive Plan Amendment;
- Planned Action Ordinance;
- Preliminary and Final Plat approvals;
- Street Vacation petition approvals;
- Future local, state and federal permits that would be required for construction and development of the Yesler Terrace community;
- Release of Funds by the U.S. Department of Housing and Urban Development (HUD); and,
- Construction and operation of the Yesler Terrace community.

EIS Scoping Process

Scoping provides notice to agencies, organizations and the public that an EIS will be prepared for the proposed project. The intent of scoping is to gather public and agency comments on the environmental issues and alternatives to be addressed in the EIS. Based on the comments received during the scoping process, the Seattle Housing Authority and the City have finalized the EIS Scope and have directed preparation of the Draft EIS.

The Seattle Housing Authority and the City of Seattle Human Services Department (acting on behalf of HUD) have determined that the proposals are reasonably likely to have adverse impacts on the environment. Given the scope of the proposal, an EIS will be prepared to address probable significant impacts associated with the proposal.

On April 1, 2010, SHA and the City initiated the EIS scoping process for the Yesler Terrace Redevelopment project by carrying out the following actions:

- Issued a joint NEPA Notice of Intent (NOI) to Prepare an EIS/SEPA Determination of Significance (DS) and Request for Comments on the Scope of the Yesler Terrace Redevelopment Project EIS. The DS/NOI included notification of a public open house to provide the public an opportunity to become more familiar with the proposal and a public scoping meeting to provide the opportunity to comment orally on the scope of the EIS, and provided notice that the minimum 21-day scoping period was extended to 45 days;
- Mailed copies of the DS/NOI to federal, state, regional and local agencies, and local organizations (see Appendix C for the complete mailing list);
- Physically distributed the DS/NOI to the current occupants of each of the units on the Yesler Terrace site;
- Published the DS/NOI in the Federal Register, WA Department of Ecology's SEPA Register,

- Published the DS/NOI in the City of Seattle Department of Planning and Development's Land Use Information Bulletin,
- Published the DS/NOI and in the Seattle Times and Seattle Daily Journal of Commerce.
- Sent a press release to 25 local newspapers, radio stations, community websites and blogs.
- Published an ad in several community and ethnic newspapers including the Capitol Hill Times, the South Seattle Beacon, the International Examiner, and the Northwest Asian News Weekly.
- Sent personal letters from Executive Director Tom Tierney to directors of 29 community organizations.

Attachment B includes documentation of the public notice actions listed above, including the DS/NOI mailing list. The EIS Scoping notification actions comply with or exceed the applicable noticing requirements.

An EIS Public Scoping meeting was held on April 29, 2010 to provide the public with opportunities to comment on the range of environmental issues that should be considered in the EIS. During the EIS Scoping meeting, the public was encouraged to provide both written and/or oral comments on the scope of the EIS. Approximately 45 members of the public attended the meeting. Of these, three individuals gave oral comments at the meeting. An open house was held from 6 – 7 p.m. and an opportunity for oral public comments was provided from 7 p.m. on.

During the EIS scoping period, seventeen comment letters/forms/emails were received, including eleven comment letters/emails from local jurisdictions and organizations (the Seattle School District, the National Park Service, the Seattle Central Little League, Seattle Public Utilities, Seattle Department of Planning and Development, Seattle Department of Transportation, Seattle Public Utilities, Puget Sound Sage, U.S. Fish & Wildlife, Seattle Displacement Coalition, and the Environmental Protection Agency) and approximately six letters/forms/emails from individuals.

It is anticipated that the EIS will analyze in detail those elements of the environment that have the potential for significant impacts. As part of the DS/NOI issuance, the lead agency and responsible entity *preliminarily* determined that the following elements of the environment should be analyzed in the Draft EIS:

- Earth
- Air Quality
- Water Resources
- Plants and Animals
- Energy – Climate Change and Greenhouse Gas Emissions
- Environmental Health
- Noise
- Land Use
- Relationship to Plans, Policies and Regulations
- Aesthetics/Light and Glare/Shadows
- Historic and Cultural Resources
- Transportation
- Public Services

- Public Utilities
- Socioeconomics/Environmental Justice

Three redevelopment mixed-use alternatives will be analyzed, as well as an existing zoning (residential) alternative. As required by SEPA and NEPA, a **No Action Alternative** will also be analyzed in the EIS. “No action” means no development would occur at this time. The site would remain in its current state.

Summary of EIS Scoping Comments

A matrix of the comments received during the scoping period is presented in **Attachment A**. For each comment letter, this matrix lists the name (and agency, if applicable) of the commenter, a summary of the comment letter, and a response to the comment as it pertains to the scope of the EIS.

Conclusions/Revisions to the EIS Scope

Many of the comments received from residents and individuals during the comment period expressed concerns regarding **Socioeconomics/Environmental Justice**, particularly relocation and social cohesion. Other comments received during the public scoping period related to **Plants and Animals, Water Resources, Historic Resources, Noise, Transportation, Air Quality, Noise** and **Public Services – Schools and Parks**.

Based on a review of the comments, the Lead Agency and the Responsible Entity have expanded the scope of analysis for various environmental elements and have determined that the following three additional elements will be analyzed in the EIS beyond those previously identified in the DS/NOI:

Public Services – Solid Waste - The following issues will be analyzed in this subsection of the Public Services section of the EIS:

- Describe solid waste services that currently serve the site and site vicinity. Identify any existing and planned capacity issues.
- Evaluate potential impacts of the proposed development on municipal solid waste, including recycling and composting infrastructure.

Energy - The following issues will be analyzed in this subsection of the Energy section, in addition to the previously scoped Climate Change and Greenhouse Gasses subsection of the EIS:

- Describe the existing energy consumption of the site.
- Evaluate potential impacts of the proposed development on energy consumption and potential energy lifecycle.

Wind – The following issues will be analyzed in this new section of the EIS:

- Describe the existing wind patterns on the site.
- Evaluate the wind impact on key pedestrian areas (e.g., the Commons park).

- Evaluate the wind shear impact on the adjacent Harborview helipad from the proposed redevelopment.

Based on the review of the comments, the Lead Agency and Responsible Entity have also determined that one additional Redevelopment Alternative shall study the impacts of 400,000 square feet of office space, reflecting a lower amount of office space than previously considered in the original Redevelopment Alternatives. This Redevelopment Alternative, titled Alternative 1A, shall include the same number of housing units and the same square footage of neighborhood commercial and neighborhood service space as Alternative 1, but include only 400,000 square feet of office space, as compared to 800,000 square feet of office space in Alternative 1.

ATTACHMENT A

Matrix of Scoping Comments/Response

Commenter Name/Agency	Summary of Comments	Response
Kathy Johnson Seattle Public Schools Facilities Planning Manager; Letter 04-27-10	Explore a partnership location of District Skill Center educational program focused on health sciences	Will be addressed in the Public Services – Schools section
James McDowell Former Yesler Terrace resident; Oral comment, 04-29-10	Is there going to be a social integration study? When you mix retail people, higher income people with low income people who are used to an environment of only low income people, what are the impacts going to be in the future?	Social cohesion impacts will be addressed in Socioeconomics/Environmental Justice section
Kristin O'Donnell Yesler Terrace resident; Oral comment, 04-29-10	Concerned what effect the higher density of the proposed redevelopment will have on families, children, and the families who live here in the future.	Will be addressed in the Socioeconomics/Environmental Justice section
	Concerned about losing private open space to grow both food and flowers; where children can play outside for informal unstructured playing in the sunshine.	Will be addressed in the Public Services – Parks section
	Yesler Terrace functions as a greenbelt, with a number of migratory birds coming through the area, birds that will not thrive in a neighborhood of eight square blocks of high rises.	Will be addressed in the Plants & Animals section
	Consider the helicopters and the freeway in the noise analysis, as well as the noise from Boren (trucks shifting going uphill, ambulances going up Boren).	Will be addressed in the Noise section

Commenter Name/Agency	Summary of Comments	Response
Fudamo Isaq, Yesler Terrace resident; Oral comment, 04-29-10	Upon redevelopment of Yesler Terrace, many residents doesn't speak English and don't know where to go. What happens to those people?	Relocation during redevelopment will be addressed in the Socioeconomics/ Environmental Justice section.
Ted Klainer; Comment form, 04-29-10	Traffic studies should specifically address volume on 9th Ave from James St to Yesler Terrace, specifically how increased traffic will affect the Harborview emergency department entrance for emergency vehicles.	Future traffic volumes will be addressed in the Transportation section
Asha Yesler Terrace resident; Comment form 04-29-10	Doesn't drive, so needs place close to shopping, and hospital	Comment noted.
Yang Lau Lin Yesler Terrace resident Comment form 04-29-10	Increased density will impact the hygienic conditions, air quality, public security, and traffic. It could have negative effects on the education of the children, welfare and medical care for the elderly, and the work and lifestyles of the middle-aged. Please do not plan the buildings too close to each other to keep fire escapes unblocked and prevent the spreading of epidemic infection.	Comment noted. Air Quality, Public Services and Traffic sections will address comments on these topics. New buildings would meet Seattle Building and Fire Code standards.
	Please add a post office, fire station and police station. Police patrols should be reinforced.	Police and Fire impacts will be addressed in the Public Services section.
	There should be a proper increase in street lighting and trees (pine trees preferred). Old trees shall be uprooted to prevent them from falling in windstorms.	Trees will be addressed in the Plants and Animals section. Street lighting will be considered during the design phase.

Commenter Name/Agency	Summary of Comments	Response
	High-rises should not be built too high and should be properly equipped with fire-prevention and anti-theft devices.	Comment noted.
	Parks should not be built on top of the apartment rooftops since they breed worms, are unsanitary and may cause water spots on the exterior wall.	Comment noted.
Mohamed Hamisam; Comment form 04-29-10	What it will take to make this houses be ready by end of next year?	Comment noted.
Mike Wold, E-mail 05-06-10	Include detailed analysis of the environmental justice impacts of each of the alternatives, including how each alternative affects the cost of housing and quality of life for people of color and low-income and moderate-income populations, not just in Yesler Terrace, but in the surrounding area	Impacts to quality of life will be addressed in the Socioeconomics/Environmental Justice section
	Consider the environmental and social impacts of how each alternative is financed and how much land ends up in public ownership.	Financing issues are outside of the scope of the EIS and will be taken into account in a separate analysis. The long-term land use implications of public versus private ownership for certain lands will be addressed in the Land Use section.
	Consider long-term leases to private developers for the effective lifetime of the buildings to be constructed instead of selling the public land for market rate units or office buildings	This comment involves SHA financing issues that are outside of the scope of the EIS. However, the long-term land use implications of this comment will be addressed in the Land Use section.

Commenter Name/Agency	Summary of Comments	Response
Jeffrey L. Durbin Section 106 Compliance Program Officer, WASO National Park Service; Letter, 5-7-10	Demonstrate compliance with Section 106; encourage early consultation with WA State Historic Preservation Officer (SHPO). Re-evaluate if Yesler Terrace property is eligible for listing in the National Register of Historic Places (NRHP). Consult with SHPO to determine if any adverse effects to adjacent historic properties.	SHA is in consultation with the SHPO and has initiated the 106 process.
	Provide analysis of visual impacts to the surrounding area, focusing on height and character	Will be addressed in the Aesthetics section, including photosimulations of the Yesler Terrace Redevelopment project from surrounding areas, and sections to represent potential heights adjacent to surrounding properties.
Sonja Richter Area resident Letter, 5-11-10	Impact on utilities, sewer, traffic, public transportation, parking, fire and police staffing, community emergency preparedness, parks, schools and additional community facilities. Who would be responsible for costs?	Water and sewer impacts will be addressed in the Utilities section. Traffic and public transportation impacts will be addressed in the Transportation section. Parks, schools, fire and police impacts will be addressed in the Public Services section. Economic factors such as public investment and financing, and responsibility for infrastructure costs, are not elements that will be included in the EIS.
	Will the retaining wall on I-5 be compromised with the redevelopment of Yesler Terrace? If it needs to be reinforced, who would pay for this?	The impact on the I-5 retaining wall will be addressed in the Earth section.
	Has a geologic study been done, particular for the regraded land on the south portion of the project that was regraded for Jackson Street a century ago?	Will be addressed in the Earth section.

Commenter Name/Agency	Summary of Comments	Response
	What plans have been made for added water detention and who would pay for this? What underground water runs through or near the site? 12 th Avenue has had some issues with water and drainage in the past.	Stormwater management will be addressed in Water Resources section.
	Is the site in the path of bird migrations? Would birds fly into tall glass buildings new to the site?	Will be addressed in the Plants & Animals section.
	SeaTac and Boeing Field have specific flight paths, as does the Harborview emergency helicopter landings. Would any new building be tall enough to be in a current flight path?	Will be addressed in the Plans and Policies section.
	Added cars, trucks, people, rooftop cooling systems, etc. will increase noise. There is current noise from I-5 and planes overhead. How much more noise will the project produce and have any studies been done as to the amount of increase in ambient noise that will be created?	Will be addressed in the Noise section.
	Has the amount of shadow and resulting loss of sunlight to surrounding areas been factored in?	A shadow analysis will be included in the Aesthetics section.
	New buildings create new wind tunnels such as in front of the old Medical/Dental Building, which was affected by the building of Westlake Center. Wind changes the environment at the ground and should be taken into consideration at the Yesler site.	Will be addressed in the Wind section.

Commenter Name/Agency	Summary of Comments	Response
	<p>Loss of the large playfield would be a loss of what is one of the largest pieces of open land near downtown and would also be the loss of one of the most wonderful territorial views in Seattle. This open space should be retained.</p>	<p>Will be addressed in the Parks section.</p>
	<p>The current redevelopment plan is simply too massive. I support a smaller redevelopment, less commercial development, and retaining more open space so near our Downtown area.</p>	<p>Comment noted.</p>
	<p>I believe that SHA could lease some parts of the land for development and still own the land under developed commercial buildings to sell at a later time, as land near downtown will only increase in value. Rent from the leased land could be used to support housing at Yesler Terrace and help make up the lack of funds from HUD.</p>	<p>This comment involves SHA financing issues that are outside of the scope of the EIS. However, similar to the comment from Mr. Wold above, the long-term land use implications of this comment will be addressed in the Land Use section.</p>
<p>Steve Orser, President, Seattle Central Little League; E-mail, 05-14-10</p>	<p>Requests that open space plans provide for the addition of or at least replacement of the Yesler Community Center field which SCLL currently uses.</p>	<p>Impacts to open space, including ballfields, will be addressed in the Public Services – Parks section.</p>

Committer Name/Agency	Summary of Comments	Response
Mark Jaeger, Seattle Public Utilities E-mail, 05-17-10	Please add a section on Solid Waste including space impacts from MSW, recycling & composting infrastructure and systems, transportation impacts from MSW, aesthetics, and impacts from salvage and deconstruction during construction.	A new section on Solid Waste will be added to the scope of the EIS to address waste generation from Yesler Terrace, composting infrastructure and systems, and potential sustainable methods of demolition. (Note: SHA currently has its own fleet of solid waste collection vehicles.)
	Potential for green design, water re-use strategies, or other innovative approaches that impact the need or size of “wet utilities” should be cited.	Will be addressed in the Water Resources section.
	The Stormwater Code should be called out specifically as a municipal code that will mitigate the impacts of new/replaced impervious surface for any of the project alternatives, in terms of impacts due to stormwater management.	Will be addressed in the Water Resources section.
	Mention the possible presence of pea patches or “urban agriculture” as part of the project and its possible relationship to water supply, composting, and use of fertilizers.	Impacts to urban agriculture will be addressed in the Public Services - Parks section.

Commenter Name/Agency	Summary of Comments	Response
Howard Greenwich Research Director Puget Sound Sage Letter via e-mail, 5-17-10	A primarily market-rate development of the scale and type proposed in the midst of a low-income community could cause substantial displacement and disruption of community services. Of particular concern is the impact to neighboring Little Saigon, which existing Yesler Terrace residents rely on for affordable retail and grocery services. New, market-rate development could cause upward pressure on surrounding area rent, forcing existing business to relocate out of Little Saigon.. While this impact is primarily economic, it may create access to food challenges and result in disparate health outcomes for Yesler Terrace residents.	Impacts to community services and adjacent neighborhoods will be addressed in the Socioeconomics/Environmental Justice and Land Use sections.
	For decades, Yesler Terrace residents have been exposed to higher amounts of air pollution due to the site's proximity to I-5. It is well documented that living within 500 meters of major roadways or freeways can cause disproportionate increases in the rate of pollution-related disease and mortality. As a matter of environmental justice, this status quo should not be acceptable and post-development air quality for the residents must meet a higher standard. This includes both indoor air quality as well as outdoor.	Will be addressed in the Air Quality section. There will not be a disproportionate impact to low-income or minority populations regarding air quality as low-income housing units will be distributed across the site.

Commenter Name/Agency	Summary of Comments	Response
	<p>By substantially increasing the density in the area, the project could create pedestrian hazards for vulnerable populations, including youth, elderly, and disabled residents of Yesler Terrace. With large backyards and relatively low density, residents currently enjoy more access to open spaces for recreation than surrounding high-density residential areas. A reduction in easily accessible open space may result in residents having to cross more streets, to access open space. At the same time, the proposed project will greatly increase the number of cars on the streets, making those even busier. In addition, impacts of other projects, such as the proposed First Hill Street Car, will create additional hazards. Low income individuals and families currently living at Yesler Terrace could be disproportionately impacted by these greater safety risks than will other residents in proposed market-rate units.</p>	<p>Impacts to open space will be addressed in the Parks section. Impacts to traffic volumes will be addressed in the Transportation section.</p>
	<p>In the context of massive, market-rate residential development, SHA should assess whether simply replacing existing low-income units will be consistent with the goals for low-income housing in the City's Comprehensive Plan. Given the importance of SHA in providing low-income housing in Seattle, SHA should consider how the ratio of new, market rates units to low-income units will affect its overall contribution to the City's affordable housing stock and how to mitigate this impact with more units than those planned for replacement.</p>	<p>Impacts to the Yesler Terrace low-income housing stock will be addressed in the Socioeconomics/ Environmental Justice and the Plans and Policies sections.</p>

Commenter Name/Agency	Summary of Comments	Response
Alan Justad Deputy Director, DPD E-mail, 5-17-10	City policy targets the Downtown Office Core as the location for large office developments and even the low end of this range may be excessive for the Yesler Terrace area. Consequently, we request that you study an alternative with an office density of no more than 400,000 square feet.	A new alternative titled Alternative 1A will be analyzed within the EIS. This alternative will be similar to Alternative 1, with the exception of including 400,000 square feet of office development rather than 800,000 square feet.
Ken S. Berg, Manager Washington Office U.S. Fish & Wildlife Letter via e-mail, 5-17-10	Utilize low impact development approaches to stormwater treatment in the redevelopment of Yesler Terrace. We recommend that all stormwater generated by this redevelopment be treated to the highest level possible based on currently available technology.	Will be addressed in the Water Resources section.
	Provide access to public transportation and promote transportation alternatives to reduce emissions that threaten our climate.	Will be addressed in the Transportation section.
Ethan Melone Rail Transit Manager Seattle Dept of Transportation Letter via e-mail, 5-17-10	The City is currently evaluating site alternatives for a storage and light maintenance facility for the First Hill Streetcar. One site under consideration would involve a joint development with SHA, involving parcels located on the block bounded by Yesler Way, 12th Avenue, Fir Street and Boren Avenue. The expanded checklist (and anticipated DNS/MDNS) for the First Hill Streetcar project will consider the impacts of a joint development project on this site including streetcar facilities, housing retail, and associated parking. Other site alternatives will also be considered.	This separate project is acknowledged in the EIS.

Committer Name/Agency	Summary of Comments	Response
<p>John V. Fox Seattle Displacement Coalition Letter via e-mail, 5-17-10</p>	<p>A modernization option must also be considered. Such an option would assume preservation of the existing unit count and mix, type and depth of housing subsidy. The number of Public Housing units serving Public Housing eligible residents in this scheme should remain essentially unchanged from the current level.</p>	<p>This is an alternative that was eliminated from detailed study because it is not financially feasible and does not meet overall project objectives.¹</p>
	<p>A “net loss analysis” must be provided for each option.</p>	<p>Will be addressed in the Socioeconomics/ Environmental Justice section. There will be no net loss of low-income housing units in any alternative. Alternatives 1-4 contemplate replacing all 561 SHA units on-site.</p>
	<p>For any alternatives studied which include an assumption that some of the existing Public Housing units are replaced off-site – either on an expanded footprint or non-contiguous properties - the analysis of these alternatives must also include an assessment not only of on-site costs and impacts, but also an assessment of the additional off-site costs.</p>	<p>Alternatives 1-4 contemplate replacing all 561 SHA units on-site. Any off-site replacement housing, if needed, will be located in the immediate vicinity of the site.¹</p>
	<p>We did not see Housing as a distinct element of the environment identified for study under each alternative. This must be added. “Socio-economic impacts” is not a substitute for a separate but equally important analysis looking exclusively on the impact of each option on total housing stock in the neighborhood and city wide, and the impact of each option on the availability of low income and very low income</p>	<p>Per the SEPA Guidelines, Housing is one of the sub-topics under Land Use, and is not a separate element of the environment. Housing issues arise in several contexts, and will primarily be addressed in the Socioeconomics/Environmental Justice section as well as the Land Use section.</p>

Commenter Name/Agency	Summary of Comments	Response
	units.	
	For each option considered, spreadsheets must be presented enumerating the following: Total number of housing units, unit mix (studio, one bedroom, two bedroom, etc), unit sizes, open space per unit (deck or ground-related), ground-related open space per unit, ground-related units, unit type (townhouse, one-story walk-up, ground-related flat, elevator access apartment, etc.), accessible unit mix.	Development assumptions for purposes of the EIS will be included in the Appendix of the EIS. ¹
	For any analysis of options that include off-site replacement units, a detailed description of neighborhood amenities and services must be provided.	Alternatives 1-4 contemplate replacing all 561 SHA units on-site. Any off-site replacement housing, if needed, will be located in the immediate vicinity of the site.
	The direct and indirect impacts on affordable housing funding resources is of critical importance. Use of such funds must be enumerated in spreadsheet form and discussed in terms of the impact on the availability of these funds for construction of subsidized housing elsewhere in the city and in the region.	This is outside the scope of the EIS. ¹
	For each option including the “no action” option, a complete life cycle energy use assessment is required, including an assessment of embodied energy associated with demolition and construction of new buildings.	Energy use will be addressed in the Energy section.

Commenter Name/Agency	Summary of Comments	Response
	<p>Engineering and architectural reports that are required by HUD to justify that the buildings at Yesler Terrace are so obsolete as to require demolition must be included as an appendix to the draft EIS.</p>	<p>The No Action alternative is included in the EIS and its environmental impacts will be analyzed. However, this alternative is not financially feasible, nor does it meet project objectives. An appendix to the Draft EIS will include detailed information on the condition of existing housing units.</p>
<p>Mike Smith Comment form, 05-17-10</p>	<p>No superblocks – they restrict access for people and police.</p> <p>Make more connections to surrounding neighborhoods to end Yesler Terrace’s isolation, including a stair connection to Jackson on 8th and full-street connection to Jackson on 10th.</p> <p>Streets function better as a “place” when both sides have same zoning and height limit. It also reduces friction among various uses.</p>	<p>Comment noted. Connections and impacts to the surrounding neighborhoods will be addressed in the Land Use section.</p>
<p>Erik Peterson Environmental Review and Sediment Management Unit. Environmental Protection Agency Letter, 05-19-10</p>	<p>Please address in the EIS how a range of alternatives focused on intensity and density most sharply defines the issues associated with meeting the purpose and need of the Yesler Terrace Redevelopment Project. Address, as appropriate, the relationship of design guidelines/mitigation measures and planning concepts to the impact analysis of different redevelopment alternatives.</p>	<p>The relationship of the redevelopment alternatives to the purpose and need will be addressed in the Proposed Actions and Alternatives chapter.</p> <p>Adoption of Design guidelines and other mitigation measures will be addressed throughout the EIS.</p>

Commenter Name/Agency	Summary of Comments	Response
	<p>Phased approach: Conformity rules under the Clean Air Act identify impacts as temporary only if they last 5 years or less. The question of whether or not this finding should also apply to impacts regarding noise, water quality, habitat, species, and so on should be examined. Long term social, economic, and environmental impacts should be acknowledged and appropriately mitigated.</p>	<p>The EIS will consider the cumulative impact of phased construction over the buildout period.</p>
	<p>Discuss the cancer and non-cancer health effects associated with air toxics and diesel particulate matter.</p> <p>Identify sensitive receptor locations, particularly parks, schools, hospitals, day care centers, etc.</p> <p>Disclose all locations at which emissions would increase near sensitive receptors. Consider intersections, increased traffic, including increased diesel traffic and increased loads on engines (higher speeds, climbs, etc.).</p> <p>Assess or account for (qualitative or modeled depending on the severity of existing and projected conditions) factors that could influence the degree of adverse impact to human health. These factors include, for example, distances to human activity centers and sensitive receptor locations and the amount, duration, location and dispersion of emissions.</p>	<p>Will be addressed in the Air Quality section.</p>

Commenter Name/Agency	Summary of Comments	Response
	<p>Hotspot analysis for receptor locations for air toxics and particulate matter.</p> <p>Commit to a full suite of air quality construction mitigation measures to avoid and minimize construction-related emissions to the extent possible.</p>	
	<p>We commend the Seattle Housing Authority and partners for the indoor air quality benefits achieved through the Breathe Easy project at High Point. We encourage your integration of lessons learned at High Point into the Yesler Terrace Redevelopment Project.</p>	<p>The issue will be addressed at the design phase of the redevelopment.</p>
	<p>In light of potential site contamination your intentions to conduct Phase I and Phase II environmental site assessments in accordance with American Society for Testing and Materials standards - is appropriate. Please disclose the most recent findings from any relevant legacy pollutant studies in the Draft EIS.</p>	<p>A Phase I assessment has been conducted. Findings will be addressed in the Earth section.</p>
	<p>Assessing health impacts is important in conducting environmental impact analyses because health effects from development projects, programs, or policies are often more far-reaching than is commonly recognized. When it appears that a HIA should be conducted, we recommend involving public health professionals early to assist in data</p>	<p>The potential for conducting an HIA will be addressed after completion of the EIS.</p>

Commenter Name/Agency	Summary of Comments	Response
	gathering and analysis.	
	To meet the requirements of the Clean Water Act, the EIS must identify all water bodies likely to be impacted by the project, the nature of the potential impacts, and the specific pollutants likely to impact those waters.	There are no 303(d) listed water bodies in the project area or likely to be affected by the redevelopment. This will be noted in the Water Resources section.
	We believe that designing for predevelopment hydrology may be an effective water quality management strategy for the Project.	Will be addressed in the Water Resources section.
	Combined sewer overflows (CSO) have measurable adverse impacts on water and sediment quality. We note that the scale of the disturbance associated with the project may present opportunities for reducing the risk of CSOs and strongly support efforts to improve the CSS, including integrated water resource infrastructure. The Washington Department of Ecology's new (5/12/10) proposed reclaimed water rule may be relevant to your efforts.	Will be addressed in the Water Resources and Utilities sections.
	Integrating enhancements for public transportation, bicycles and pedestrians – as well as providing through capacity for vehicles – is consistent with quality urban design, increases clean and efficient transportation options, and promotes healthy living. To assess/inform the sustainability of your designs we recommend you consider and discuss – if	Multi-modal transportation systems will be addressed in the Transportation section.

Commenter Name/Agency	Summary of Comments	Response
	appropriate - the usefulness of relevant performance metrics. "Greenroads", for example, is a tool which can be used to assess/inform roadway sustainability – a key component of an integrated and sustainable transportation system.	
	We believe monitoring associated with the Yesler Terrace Redevelopment Project is an opportunity to both learn about and learn from livability measures and tools. Your efforts to benchmark existing conditions develop tools to measure progress towards achieving community visions and increase the accountability of engaging in sustainable redevelopment may help to (i) move the national dialogue on livability measures forward, and, (ii) effectively measure the performance of your efforts. We recommend that the EIS discuss your effectiveness monitoring strategy.	The EIS will provide baseline (existing) information for the elements within the scope of this EIS.
	Your "Yesler Terrace Background Report" includes potentially beneficial urban forest restoration goals. EPA strongly supports these goals and we recommend that the EIS compare how different redevelopment alternatives, design guidelines/ mitigation measures and planning concepts would impact reaching them.	Impacts to the urban forest will be addressed in the Plants and Animals section.
	The EIS should identify the endangered, threatened, and candidate plant and animal species under ESA, and other sensitive species	Will be addressed in the Plants and Animals section.

Commenter Name/Agency	Summary of Comments	Response
	<p>within the project area. The EIS should describe critical habitat for the species; identify impacts the project would have on species and their critical habitats; and how the project would meet all ESA requirements, including consultation with the U.S. Fish and Wildlife Service (USFWS) and National Oceanographic Atmospheric Administration National Marine Fisheries Service (NOAA Fisheries). We believe an adequate EIS includes – if relevant to the project - a biological assessment and/or a description of the ESA Section 7 consultation with USFWS and NOAA Fisheries.</p>	
	<p>Ground disturbing activities create opportunity for establishment of non-native invasive species. In compliance with NEPA and with the Executive Order 13112, analysis and disclosure of these actions and their effects, as well as any mitigation to prevent or control such outbreaks should be included. We urge that disturbed areas be revegetated using native species and that there be ongoing maintenance (wholly or primarily non-chemical means) to prevent establishment of invasives in areas disturbed by project activities.</p>	<p>Will be addressed in Plants and Animals section.</p>
	<p>We expect that the “state of science” on urban agriculture would be reflected in Yesler Terrace’s redevelopment alternatives, planning concepts, design guidelines/ mitigation measures and their analysis. Some issues to</p>	<p>Impacts to urban agriculture will be addressed in Public Services – Parks section.</p>

Commenter Name/Agency	Summary of Comments	Response
	<p>consider include the following:</p> <ul style="list-style-type: none"> • The current and future (under various redevelopment alternatives and/or planning concepts) areal extent of urban agriculture on the site • The current and future economic and social contributions of urban agriculture on the site • An urban agriculture plan 	
	<p>We recommend that entities take voluntary action to mitigate GHG emissions. We, therefore, encourage your efforts to mitigate embodied, operational, and transportation carbon impacts. Innovative district energy designs – including partnerships with nearby facilities (e.g., a thermal loop with Harborview) – are potentially significant opportunities to mitigate the project’s GHG emissions.</p>	<p>Will be addressed in Greenhouse Gas Emissions section.</p>
	<p>The information gathered from the public participation process and how this information is factored into decision-making should be disclosed in the EIS.</p>	<p>A summary of the public participation process for this project will be included in the EIS.</p>
	<p>Government-to-government consultation with federally recognized Indian tribal governments is legally required. EPA recommends that lead agencies consult with the potentially affected tribes specific to their interests and concerns.</p>	<p>The Cultural Resources Report will be submitted to the SHPO for review. Affected tribes were notified of the project through the DS/NOI.</p>

Commenter Name/Agency	Summary of Comments	Response
	The NEPA regulations require that effects on cultural resources are considered in judging the significance of environmental impacts.	Will be addressed in the Cultural Resources section.

¹ While the financial analysis for the project is outside of the scope of the EIS, SHA will share this information with stakeholders, such as the Yesler Terrace Citizen Review Committee, for their consideration and advice.

ATTACHMENT B

Public Notice Documentation