Draft South Downtown Subarea Plan and Environmental Impact Statement

- Comments Received -

Comment Period March 26, 2013 to May 3, 2013
Memorandum

To: Ian Munge, City of Tacoma

From: Cross-Cultural Collaborative of Pierce County

Date: January 14, 2012

Re: Draft Environmental Impact Statement (EIS) for the South Downtown Subarea Plan

Background:

The Cross Cultural Collaborative of Pierce County (CCC) was formed over a decade ago to innovate and implement effective, collaborative approaches to reducing health disparities across racial, ethnic, cultural, and linguistic lines. As the CCC seeks to reduce health disparities, we focus our attention on the social determinants of health, which include social, economic, and environmental factors.

Response to Draft EIS:

*Maintaining and Enhancing Access to Critical Services:* The South Downtown Subarea includes a number of organizations, which provide critical services to underserved populations. These organizations include:

1. Tacoma Rescue Mission
2. Catholic Community Services
3. Healthcare for the Homeless
4. St Leo
5. Tahoma Indian Center
6. Various Meal-sites

In developing this plan, consideration must be given to the impacts of disrupting these key services, and the challenges posed to the populations that they serve. In addition, we ask that the plan increase ease in accessing these necessary services by ensuring that the area is pedestrian focused, to include sidewalks, bike-lanes, curb-cuts, appropriate lighting and signage, mass transit (bus) access, and safety features.

*Elimination of Displacement and Increasing Access:* In addition, there are large numbers of homeless individuals and families in the area, who must access needed resources. While some have discounted these populations (not including them in resident or population counts), we are concerned about the impacts of this plan upon these individuals and families, who suffer from chronic homelessness or are in a crisis situation. Plans developed should not further displace these individuals or add to the challenges that they experience. For this reason, this plan should include an emphasis on pedestrian access (sidewalks, signage, etc.), alternative modes of transportation (bike-lanes, bus transit, etc.), and ensuring that individuals of varying physical capacities have access to the area (curb cuts, benches, etc.).

Summary:

The CCC appreciates the amount of time invested in developing this draft EIS and, too, the opportunity to provide feedback. We hope to contribute to this process by promoting health and environmental equity and the development of healthy communities through our involvement.
Addendum: Additional Responses from Independent Partners

Comment 1:

Pages 1 through 4: Use the same nomenclature for each place reference in the document.

On page 2 second paragraph the area nomenclature ‘the Thea Foss Waterway’ is also referred to as the ‘Foss Waterway’ in the fourth paragraph.

“The South Downtown Subarea Plan should reinforce already established planning policies that promote the restoration and improvement of the Foss Waterway.”

Label Vision statements

Ø Equitable Opportunity: a thriving, equitable urban center that offers a rich spectrum of opportunities to live, learn, work, and play;

Ø Active Mixed-Use: a vibrant, walkable, mixed-use community that provides a robust range of housing, health care, transportation, employment, and recreation choices, and is a welcoming home to people of all cultures, ages, and incomes;

Ø Integrated Connections: an integrated component of the greater City that capitalizes on the unique character of its five districts and promotes cross-pollination between them, nurtures mutually supportive connections to surrounding communities, leverages its regional transit assets, and projects a compelling identity to the region and beyond.

Page 1 of 4: South Downtown Tacoma is NOT identified. capitalizes on the unique character of its five districts? Bullet reads: an integrated component of the greater City that capitalizes on the unique character of its five districts and promotes cross-pollination between them, nurtures mutually supportive connections to surrounding communities, leverages its regional transit assets, and projects a compelling identity to the region and beyond.

Districts are political City segments; eight neighborhood councils; Tacoma’s Neighborhood Business Districts number 15 & ‘The Cross District Association of Tacoma’ has profiles of each; and, the City’s Comprehensive Plan doesn’t name anything South Downtown Tacoma. My Google Search returned ‘Tacoma districts map’ images and none are labeled – ‘South Downtown Tacoma’. The only reference I could find was ‘South Downtown Subarea Plan’

Project Scope of Work

The City is participating in the Puget Sound Regional Council’s (PSRC) Growing Transit Communities project. The City has been awarded $500,000 to complete the "Dome/Brewery Subarea Plan & EIS", one of two Growing Transit Communities catalyst projects in the region. Growing Transit Communities is funded by a grant from the U.S. Department of Housing and Urban Development Sustainable Communities Regional Planning Grant Program.

For the purpose of the project, the "Dome/Brewery Subarea" encompasses such major districts in the southern portion of Downtown Tacoma as the Dome District, the Brewery District, the Thea Foss Waterway, and the University of Washington Tacoma campus; hence the use of the alternative title of the project: "South Downtown Subarea Plan & EIS."

Project timeline is 2011-2013. The intent of the project is to develop an innovative area-wide long-range plan for the south end of downtown Tacoma and to complete the pre-development environmental review that will identify how to address environmental and community issues, ultimately reducing development uncertainties and risks for future projects and defining implementation timelines.
The verb of a sentence must agree with the subject in number and in person.  

Sentence Reads:  
The 1990 establishment and subsequent rapid growth of a new University of Washington campus is bringing a powerful new vitality and center of gravity to South Downtown.  
Should Read:  
The University of Washington campus 1990 establishment with its subsequent rapid growth is bringing a powerful new vitality to the South Downtown center of gravity.

Comment 2:  

I would add specific Land Use strategies to the draft response letter. Please see Walksteps -  
http://walksteps.org/tactic_category/land-use/  
- Support Street Life with Mixed-Use, Form-Based Zoning  
- Manage Parking to Promote Walking  
- Add Street-Connectivity Minimums into Subdivision Ordinances  
- Retrofit Street, Walking, and Bicycle Connections into Existing Suburbs  
- Create Transit-Oriented Development (TOD)  
- Provide LOS Exemptions for Pedestrian, Transit, and Bicycling Infrastructure Improvements  
- Diversify Suburban Land Use Regulations  
- Transform Underutilized Malls into Walkable Destinations  
- Encourage Temporary Uses in Vacant Buildings and Sites  
- Permit Park(ing) Day Every Day

The Form to Download “Steps to a Walkable Community: A Guide for Citizens, Planners, and Engineers”  
*.PDF is located at http://americawalks.org/walksteps/. Thank you for your attention to this matter.

This option would require additional involvement to localize the implied considerations. I’m not sure the CCC has the expertise to offer the code wording that eventually will be required. Hopefully, City of Tacoma’s staff can supply the expertise.
Addendum: Additional Responses from Independent Partners

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Page 2 of 4 Issue: The verb of a sentence must agree with the subject in number and in person.
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Should Read:
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Page 3 of 4 Issue: Adjective Use
Bullet Reads:
Catalytic Redevelopment Projects: Incentivized public-private partnerships will be key to promoting "trail blazer" projects that catalyze follow-on private investment.
Should Read:
Catalytic Redevelopment Projects: Incentivized public-private partnerships will be the key to promoting "trail blazer" projects that catalyze follow-on private investment.

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Comment Form

Please provide any comments or questions you have about the Draft South Downtown Subarea Plan and EIS:

My name is Jessica Bolich & I am a Sophomore at UNT in the urban studies & sustainable urban development programs. I was required to go to a city council meeting for a class & I'm glad I did.

I think the idea of funding this area is one of the best decisions that can be made & I think anyone who lives/works around here would agree.

My question is about the involvement of UNT & its students in these processes. I am confident that students have a fresh perspective & a genuine interest, given an opportunity. I do recognize that these are public matters & everyone can participate, but what can we do moving forward to get a whole group of URBAN STUDIES students involved?

Thank you.

Please provide your contact information below:

Name: Jessica Bolich E-mail: bolichj@uw.edu
Address: 5109 1st St
City, State, Zip: Tacoma, WA 98405 Phone: 206-373-7543

4/25/13
May 2, 2013

Ian S. Munce, J.D., AICP
Long-Range Planning Division Manager (Acting)
Community & Economic Development
City of Tacoma
747 Market Street, Room 1036
Tacoma, WA 98402

Re: Draft Tacoma South Downtown Subarea Plan & Environmental Impact Statement (EIS)

Dear Ian,

Thank you for the opportunity to review and comment on the City of Tacoma’s Tacoma South Downtown Sub-area Plan & Environmental Impact Statement (EIS). The Washington State Department of Transportation (WSDOT), as a regional partner in transportation planning, supports your efforts to address local land use and transportation issues that affect the state transportation system and we thank you for including us in this process. In general, the scenarios in this plan are consistent with statewide goals related to growth management and sustainability by focusing growth in an existing urban area in mixed-use neighborhoods, and working toward the provision of a wide variety of transportation choices for residents and businesses; we are providing the following comments for your consideration:

WSDOT requests the Final EIS reflect the current status of the Point Defiance Bypass Project. We acknowledge that the City’s draft SEPA EIS was in preparation as the Point Defiance Bypass project-level environmental compliance was being conducted in compliance with the National Environmental Policy Act (NEPA). As a result the City’s DEIS states that the project remains in the planning and NEPA preparation stage.

The Point Defiance Bypass project team published the project’s Environmental Assessment (EA) on October 8, 2012 for local jurisdiction and public comment. The Environmental Assessment was updated and reissued with the Federal Rail Administration (FRA) Finding of No Significant Impact (FONSI) on March 1, 2013. WSDOT relied on the NEPA documentation and concurred with the findings in the FRA’s decision document. WSDOT issued a Determination of Nonsignificance (DNS) and SEPA Environmental Checklist on March 13, 2013.

With the completion of the NEPA and SEPA documentation, the WSDOT project team is now advancing design work to reroute passenger trains from the BNSF Railway main line near Point Defiance to an existing, and less congested, rail line that travels through south Tacoma, Lakewood and DuPont. Design work includes the Tacoma Amtrak Station Relocation to the Tacoma Dome Station at Freighthouse Square, Track and Signal
improvements from South 66th Street to a location southeast of the I-5/Mounts Road Southwest interchange. The project includes upgrades to five highway-rail at-grade crossings, and Track and Signal improvements to the BNSF owned Nisqually Control Point located at the southern terminus of the Point Defiance Bypass route. WSDOT expects construction to begin in 2015 with opening of the new route to service in 2017.

**Page 3.11-35 (EIS), Railroads**
Recommended changes to the following paragraphs within this section are provided (suggested edits are depicted as track changes).

Amtrak service currently follows the BNSF and UPRR corridors, sharing that passage with freight service through dockside north to Point Defiance. WSDOT and FRA are proceeding with final design to reroute Amtrak service from the Puget Sound route to the Point Defiance Bypass route traveling through south Tacoma, Lakewood, and DuPont. With the Sounder Extension, Amtrak trains may also begin using the Point Defiance bypass route approaching and departing Tacoma from the south. 18 Amtrak routing south of Tacoma Station has not yet been determined as of October 2012.

With the completion of the NEPA and SEPA documentation in March 2013, design work is underway. Major elements include the Tacoma Amtrak Station Relocation to the Tacoma Dome Station at Freighthouse Square, Track and Signal improvements from South 66th Street to a location southeast of the I-5/Mounts Road Southwest interchange, upgrades to five highway-rail at-grade crossings, and Track and Signal improvements. The lead agencies expect construction to begin in 2015 with opening of the new route to service in 2017. WSDOT recently completed the Point Defiance Bypass Environmental Assessment to evaluate the rerouting of passenger trains from the Point Defiance route to the rail line traveling through south Tacoma, Lakewood, and DuPont. The existing BNSF route, WSDOT found, is near capacity, with physical and operational constraints adversely affecting passenger and freight train service. 1919 WSDOT (2012); Point Defiance Bypass Project Environmental Assessment. Pp4-12

A key project element recommendation of this assessment is relocation of the Amtrak Station from its current location to Freighthouse Square station (served by Sounder and LINK), approximately one half mile from the current Amtrak station. This project is still under review and would require station relocation will include new track extensions and other improvements to the station and platforms at Freighthouse Square to accommodate Amtrak’s Cascades and Coast Starlight train services. The project’s environment decision documents describe commitments to address impacts and to continue coordination with local partners. (If further details are needed, consider a footnote: “WSDOT and FRA committed to additional coordination and study at the C and D Street intersections as part of the final design process. The environmental documents describe minimization measures to address operational effects on traffic as a result of the Coast Starlight dwell time at Freighthouse Square, and during a Tacoma Dome event. These may include implementation of a detour plan that could include static
Mr. Ian S. Munce  
May 2, 2013  
Page 3

signs identifying the detour routes, dynamic message signs that identify the detour routes during a train blockage, lane striping and controller modification.”)

WSDOT estimates an additional 14 trains per day with this modification, 12 Cascade trains and two Coast Starlight trains. Relocation of the Amtrak passenger rail corridor would reduce travel time of the Amtrak Cascades by 10 minutes and reduce the potential for passenger-freight service conflicts. Relocation of station services to a consolidated building would have a positive effect on wayfinding and mobility for pedestrians and other users. 20 Project is funded by an American Recovery and Reinvestment Act (ARRA) High Speed Rail award received by Washington State in 2010.

Page 3.11-37(EIS), Railroads  
Fourth Paragraph – last sentence  
Currently reads… “Along with associated track improvements, the Point Defiance bypass will help reduce rail passenger travel times between Tacoma Dome Station and Portland by 10 minutes. This statement is not accurate; please replace with the following:

The potential impacts of the Action Alternatives on passenger rail service will primarily be mitigated by service improvements that allow for increased capacity as well as decreased travel times on the Amtrak Cascades Corridor. The 2006 Washington State Long-Range Plan for Amtrak Cascades states that by 2023 service will grow from its current four daily round trips to 13 daily round trips between Portland and Seattle. Along with associated track improvements, the Point Defiance bypass will help reduce rail passenger travel times between Seattle and Portland by 10 minutes, increase Amtrak Cascades round-trips from four to six by 2017 to meet projected service demands, and improve on-time performance to 88 percent.

Page 3.11-39 (EIS), Figure 3.11-11  
This plate outlines the Bus and Rail Service corridors within the South Downtown Subarea. Please revise “Amtrack” to “Amtrak” on this plate.

Page 2 (EIS), References  
(Please update the reference – we republished the EA with decision documents in March 2013.)  
Washington State Department of Transportation (WSDOT). Point Defiance Bypass Project Environmental Assessment. 2013.

Page 3.7-29 (EIS), Washington State Policy on Greenhouse Gas Emissions  
Link for footnote 12 does not appear to be active. Suggest revising section to read “Washington State Policy on VMT and Greenhouse Gas Emissions Reductions” and also cite the state GHG reduction legislation (RCW 70.235.020).  
Link to legislation in footnote 4 does not appear to be active. Check for same changes needed in Subarea plan (such as page 22, same footnote).

Page 3.11-28 (EIS). Additional Vehicular Traffic Reduction Strategies
Suggest referencing the fairly active TDM programs already in place at the City of Tacoma and Downtown on the Go, and expansion of these programs—may want to contact Diane Wiatr (DWIATR@ci.tacoma.wa.us), and Downtown on the Go (kristinaw@tacomachamber.org).

Page 3.11-32 (EIS). Policy and Institutional Reforms
The last paragraph indicates that “…the City and major property owners in the District can facilitate the formation of a Transportation Management Association (TMA)…” Suggest instead referencing Tacoma’s existing TMA: “Downtown on the Go”. http://www.downtownonthego.com/

Page 3.11-72 (EIS). 3.11.5.3 Mitigation Measures
While there are a lot of good ideas in the section relating to parking mitigation, it is too long and difficult to follow. We would suggest summarizing a few key mitigation strategies and more briefly referencing connections to the comprehensive plan, etc. Because parking management can be so important, focusing it a bit more may be more effective and useful.

Page 3.11.25 (EIS). 3.11.1.3 Mitigation Measures
Page 136 (Subarea Plan), Strategies – Engineering Codes
The South Downtown Subarea plan is proposing under Recommendation M-1 to “Move traffic analysis and mitigation for the South Downtown Subarea from SEPA to new engineering codes”. WSDOT recognizes that the state transportation system serves an important role in the economic prosperity and community health and safety of your community, and supports your decision to defer the consideration of significant project level traffic impacts, as provided in RCW 43.21C.440(c). We suggest you explicitly state that is your intention using the language in the state statute to minimize confusion.

Also, WSDOT requests that the engineering section of the Tacoma Municipal Code set forth how to identify and address potential impacts to state transportation facilities within the subarea.

As noted in previous correspondence due to the recent improvements that WSDOT has and is currently implementing on the I-5 and SR 16 corridors near the study area we would anticipate that any impacts due to development over time would likely occur at the connection of the state system with the local system (interchanges, ramp terminals and intersections). Though the percentage of single occupant vehicles is anticipated to decrease, traffic volumes and vehicle delay are predicted to increase on the limited access highways within the subarea. Therefore we want to ensure whatever traffic analysis and
mitigation mechanism is implemented will address infrastructure impacts to state transportation facilities.

Currently WSDOT thresholds for possible SEPA mitigation are based upon Appendix G in the Highway System Plan. Our level of service threshold for Highways of Statewide Significance such as I-705 and SR 509 is LOS "D" in urban locations. If the LOS "D" urban threshold is already exceeded, developers would be expected to mitigate their impacts sufficiently to restore the pre-development level of service.

Mitigation does not always mean widening or additional channelization to improve level of service, but could involve other improvements such as transit enhancements or non-motorized improvements if the end result reduces travel delay to pre-development level of service or to a LOS "D" or better condition.

WSDOT would like the opportunity to review and comment on any amendment to the engineering section of the Tacoma Municipal Code that addresses the traffic analysis and mitigation for the South Downtown Subarea. Items we recommend addressing in the amendment;

- Notification to WSDOT of significant development applications and a 14 day comment period for project proposals.
- Identification of thresholds for implementing mitigation improvements and the means to trigger those improvements.

Page 3.11.25 (EIS), 3.11.1.3 Mitigation Measures
Page 137(Subarea Plan), Strategies – Development Thresholds for Impact Fees
The proposed impact fees are identified as an approach to fund multimodal transportation infrastructure, WDOT recommends roadway improvements be eligible for funding through this approach, including improvements to state transportation facilities.

When establishing traffic mitigation thresholds in your engineering code, WDOT recommends equating your proposed thresholds, currently expressed in terms of square footage of development to measurements used in standard traffic analysis to determine transportation mitigation, i.e. trips generated, traffic volumes, etc.

WSDOT also requests you to consider providing a periodic review and update procedure to monitor the implementation of the planned action and consider changes as warranted. WSDOT’s concern is that, when development does occur over time, it could take the form of something very different than what the EIS and preferred alternative assumes. Or some of the traffic mitigation you assume will be provided by increases in transit service may never materialize if voters choose not to fund it sufficiently. This could result in significant changes in growth and trip generation than envisioned, resulting traffic impacts not mitigated in this EIS. A periodic review and update procedure would allow you to take a new look at mitigation if conditions assumed in the EIS are not realized.
Thank you again for the opportunity to comment on the Draft Tacoma South Downtown Subarea Plan & Environmental Impact Statement EIS and we look forward to continue our working relationship with the city on this matter. If you have any questions please contact George Kovich of my office at 360.704.3207 or kovichg@wsdot.wa.gov.

Sincerely,

Ron Landon
Planning and Program Manager
WSDOT, Olympic Region

cc: Dale Severson, WSDOT Olympic Region Development Services
Leah Bolotin, WSDOT, Urban Planning Office
Carol Lee Roalkvam, WSDOT Environmental
Kathy Leota, WSDOT Public Transportation
Karena Houser, WSDOT Community Transportation Planning
Hi Cheri,
Whew wasn't sure I would get this done!  too nice out!
Here are my comments some are just conversational but some are real :)
Basically, my comments at the Public Meeting are the most pertinent, make sure we all of us the neighborhood, the city and citizens follow thru on this Plan! : ) OK!
I'm outside painting on our building now but if you happen to be at the Farmers Market during lunch stop by the bike booth and say hi.  Rick and I are volunteering to man the maps today until about 1pm.
Best regards, Jori
Note on South Downtown Subarea Plan and EIS

Pg 9 key elements – Preservation and Adaptive reuse: change historical to old so that we are not cutting out most of the older building of our neighborhoods (for example; our bldgs would not be part of any historical designation)

Pg 11 & 12 Adverse impacts of stagnation and Positive impacts of redevelopment - Hear, hear well done!

Pg 26 Ah, so this is where the boundaries came from! The Comp Plan's “Character Areas”.... This is for Ian - Harder to change, but maybe we need to apply do that next year. NTNC can take this on especially if Stadium has the same issues.

Pg 49 Policy Framework's 5 strategies -

Pg 50 Under Proposed Actions 1.1.1 last bullet, the PW parcel - I hope that creating a Storm Water Interpretive Park with trails/retention ponds is seen as galvanizing private investment.

Pg 51 Proposed Actions 1.4.2 is this where we say no surface parking in the Core of the Dome District? And were we going to somewhere suggest unbundling parking from cost of renting an apt. or an office?

Pg 51 Proposed Actions 1.4.3 after the Amtrak meetings, I think, we could up date this one to say something like; coordinate and support Pierce Transit to commence charging for parking in.... It's going to happen.

Pg 52 Proposed Actions 2.1.10 am not sure what this has to do with saving existing buildings, but am glad it is somewhere. Will this get done just by having this plan adopted by the City Council? Should coordinate with Stadium's boundary issues and maybe others....

Pg 53 Proposed Actions 2.4.2 WOW! We are just too early..... 2.4.4 design competition, great idea

Pg 54 The B St. Gulch is in the trail portion of the Open Space system map 3.2.1, but I think it should also show up under 3.1 referring back to Pg 50 1.1.1 Public Works yard as a catalyzing parcel shared, of course, with the twin ninety-sixers and the San. Sewer Pump Station as open space for the future. We need this in here for Mike Slevin too, so he can help get funding for development of the Storm Water Interpretive Park.

Pg 55 Proposed Actions 3.4.3 Great! 3.4.5 & 3.4.6 Yes! We want to use this in our next project, hopefully not with the bureaucratic roadblocks and expenses thrown up by Public Works this time.... 3.4.8 should also be helpful to Environment Dept in getting funding for B St. Gulch

PG 56 Proposed Actions 3.5.3 & 3.5.6 Iconic gateway elements.... unique wayfinding themes and elements the differentiate.... our palm trees! We need a couple more here and there; like at the corner of D and Puyallup....

Pg 58 Proposed Actions 5.2.9 Hasn't a site been purchased and decided on as Central Park? Yes, see Pg 120

Pg 59 Proposed Actions 5.3.8 So glad to see this in here! We should try to keep the rubber track crossing at 15th to remind us of the real extension until it can be realized.

Pg 61 4th bullet – UCX-TD allows fewer uses I know this is sort of last minute, but what are the added uses that are allowed in DMU?
Pg 68 & 69 So, nothing that helps us with the IBC or gives more authority to an enlightened Building Official to interpret the code, directing him to look at the *intent* rather than the just letter of the code, or to use the IEBC which has given the Building Official more authority to interpret the code by looking at other factors in making a judgement that will save older existing buildings.

Pg 99 Historic Resource Conservation Strategies  L/W & W/L  Again I feel that we should talk of older building rather than just historic buildings or we leave out most of Tacoma's older buildings, like ours...... tho I am happy to see the historic Streets and Grounds Building get the attention it deserves.

Pg 106 You can take the yellow dot off our 301 building as we finally got a letter from Ecology stating that there no longer is any contamination from the tank that was removed 15 years ago (it took us ten years to get the letter).

Pg124 glad to see an example of a bioswals on a steeper street. I hope we can do this in the future on E C St.

Pg 132 How can Tacoma be a city w/o Transit? I think Tacoma should pursue a bus company to be a transit system for just Tacoma with a few strategic lines out like to PLU and ..... This bus system should have smaller busses that come by more frequently.  This city needs a Transportation Plan, what are we trying to do here?!

Pg 140 great to see unbundling of parking from units

Pg 145 Of course, are very excited about the Puyallup Ave. Complete Streets make over!

Pg 147 also in the Brewery District.... too bad it didn't happen with the S C St./ Commerce St. sewer work....

Pg 148 *Link Extension* might want to update this after Council vote

Pg 149 We should change this section to refer to the recommendation letter we just pulled together. Get a copy from Ian  No longer looking at Puyallup tribe site

Pg 180 The southern portion of the site is either owned by Rick and me or is the bridge to the B St. gulch. Also the twin Ninetsixers run thru there and I don't think they can be built on. I should have shared our plans for our site there. We are having BLRB do a feasibility study for it right now.

Pg 184 P10: Foss Waterway Site 1 - now has a developer with concept drawings done!
May 2, 2013

Ian Munce, Special Assistant to the Director
City of Tacoma
Planning and Development Services Department
747 Market Street, Room 345
Tacoma WA 98402

RE: DRAFT SOUTH DOWNTOWN SUBAREA PLAN & DRAFT ENVIRONMENTAL IMPACT STATEMENT (DEIS)

Thank you for the opportunity to provide comments related to the Draft South Downtown Subarea Plan & DEIS documents currently available for review. Both documents reflect extensive community input and involvement by the subarea plan team. It was a pleasure to read these documents and see the vision that the community has expressed reflected in them.

Pierce Transit has significant interest in the growth and development of this subarea. Because of the importance of these plans and the information contained within, we are providing very detailed and lengthy comments. The following comments relate to both the subarea plan and DEIS.

1. General Comment: Both documents frequently reference the Tacoma Dome Station multimodal facility and the parking garages. I was not able to find a reference that Pierce Transit is the owner of the multimodal facility and garages and is responsible for operations and maintenance of this facility. It would be helpful to include such a reference so that individuals seeking information regarding those facilities know to contact Pierce Transit.

2. Subarea Plan, Page 31. In the paragraph describing zoning, the second line references Figure 2-5. It appears that reference should be updated to reflect Figure 2-16.

3. Subarea Plan, Page 32. Figure 2-18 Existing Zoning has a number of areas shaded in black and maybe with hatching. The legend doesn’t reference a zoning designation with that color. Should this be updated?

4. Subarea Plan, Page 50. The first sentence under Strategy 1: Develop in relationship to transit, indicates "South Downtown is endowed with exceptional transit investments including Link light rail, Sounder Commuter Rail, Amtrak, and Pierce Transit...." That introduction does not reference the significant Regional Express bus service provided from the facility by Sound Transit nor differentiate Pierce Transit as the local service provider. Recommend modifying the sentence similar to, "South Downtown is endowed with exceptional transit investments including Link light rail, Sounder Commuter Rail, Pierce Transit, Sound Transit Regional Express bus service...."
Sound Transit Regional Express bus service, Amtrak, and Pierce Transit local bus service...”

5. Subarea Plan, Page 51. Proposed Action 1.3.3 “Coordinate with UWT’s proposed plans for a transit priority street on Market Street and explore opportunities for enhancements and extensions through street design and land use.” At this time Pierce Transit and the University of Washington (Tacoma) in their master plan has identified Market Street as a transit corridor with local bus service. With system plans and the de-emphasis of service from Commerce Street, Pierce Transit local service will operate on multiple corridors in the Downtown area to distribute service to destinations riders are trying to access. This does continue to include Market Street.

6. Subarea Plan, Page 51. Proposed Action 1.3.5 “Ensure that all planning efforts for the Puyallup Avenue corridor take into account Pierce Transit’s efforts to develop transit corridors connecting future high-capacity transit along Pacific Avenue to the Tacoma Dome.” Pierce Transit strongly supports this action and we have engaged traffic engineering services to assist with developing recommendations to ensure transit reliability and connections along Puyallup Avenue. Given the magnitude of employment and population growth anticipated with this plan and DEIS, ensuring reliable transit access to accommodate transit connections is critical. Pierce Transit will schedule further meetings with City planning and engineering staff to continue conversations on possible transit elements to include along Puyallup Avenue. Initial concepts for transit lanes are attached as Attachment 1 to this letter. As the City’s planning efforts for Puyallup Avenue continue to move forward and potential grant funds are sought, we seek to incorporate these types of elements.

7. Subarea Plan, Page 51. Proposed Action 1.4.3 “Coordinate with Pierce Transit to explore charging for parking in the Pierce Transit garages, a strategy that would encourage other modes of access to the station and free up the garage for longer distance commuters and other users.” Pierce Transit and Sound Transit share in the operations and maintenance for the Tacoma Dome Station (TDS). Any policy issues related to charging for parking will be a policy discussion to be considered by both Pierce Transit’s and Sound Transit’s Board of Commissioners. Early conversations between our agencies have considered utilizing the ORCA fare card as a mechanism to validate parking for public transportation passengers. Transit users would potentially validate parking with ORCA. Non-transit users would potentially pay a fee to use the garage. The priority for these garages is parking for public transportation users. Given the magnitude of the daily transit person trip growth identified in the DEIS document (2010-94,11, No Action Alternative 31,919 in 2030, Modest Buildout 44,235 in 2030, Medium Buildout 64,865 in 2030, and Large Scale Buildout 77,296 in 2030), ensuring transit priority use for the parking will be paramount.

8. Subarea Plan, Page 57. Proposed Action 4.2.5 “Target Market Street and Tacoma Avenue for transit service.” Thank you for the comment and recommendation. Pierce Transit currently has targeted both corridors for local service and will continue to consider the subarea plan and recommendations as we complete further service planning efforts.
9. Subarea Plan, Page 57. Proposed Action 4.3.5 “Consider a future street vacation and realignment of Jefferson Avenue at its intersection with Market Street in order to utilize the excess right-of-way to expand development while also improving the pedestrian/bicycle safety and comfort of the intersection.” Please clarify the limits of this project, is the proposal to vacate Jefferson from Market Street to Commerce Street? Pierce Transit currently operates Route 48 along this corridor with a bus stop near 19th Street with significant ridership. This bus stop was also recently improved by UWT as part of its new library and includes a passenger shelter and bench. If Jefferson were to be vacated, this Route 48 service would likely remain on Market Street.

10. Subarea Plan, Page 58. Proposed Action 4.4.6 “Continue to focus on education for students, faculty and staff on transit, walking and bicycling on campus.” Pierce Transit is supportive of this action strategy and would be able to provide assistance through our CTR programs.

11. Subarea Plan, Page 59. Proposed Action 5.3.5 “Advocate for the expansion of Pierce Transit’s shuttle service to points north of 15th Street on Dock Street”. Please provide clarity in this action strategy. Pierce Transit operates SHUTTLE paratransit service for individuals with disabilities; this is a service scheduled on demand for qualified clients. Is that the intent of this recommendation? Or, is the action item to seek extension of fixed route service (currently Routes 13 & 14) further north on Dock Street past 15th Street? Is there a specific destination – either Downtown Tacoma or a specific Mixed Use Center – that was of interest for this service? Is the recommendation to utilize smaller vehicles or provide what is often described as a “circulator” service? We also need to note that buses are not able to make the turn from northbound Ruston Way to southbound Dock Street. The configuration of the bridge design and roadway does not allow adequate room for a bus to turn and stay in its lane of traffic. This prohibits a bus from operating in that direction.

12. Subarea Plan, Page 59. Proposed Action 5.4.5 “Explore the creation of a tourist shuttle bus circulator service that loops between the Waterway, the museums, and possibly other downtown attractions”. Similar to Comment #12 above, please clarify if this is intended to be a recommendation for seasonal service – have there been discussions of funding for such a service from the Pierce County Chamber of Commerce, Foss Water Development Group, or other entity? Is this recommendation proposed as a Pierce Transit service or other?

13. Subarea Plan, Page 61. Recommendation LU-1: “Convert the UCX-TD in the Dome District to Downtown Mixed-Use.” Pierce Transit is supportive of this recommended zoning redesignation. Such a change would allow for high-density development with less stringent development standards including parking requirements. This would support development in the district.

14. Subarea Plan, Page 130. Figure 9-2 Key Features of Existing Transportation Network. This figure should be updated to reflect all transit service on corridors in the network. The map currently only highlights “Bus Corridors Serving Multiple Routes”. That
designation leaves out significant amounts of local and express transit service on major corridors including South 11/13th Streets, South 19th Street, Yakima Street, Tacoma Avenue, Market Street and Jefferson Street. While there may only be one route on some of these corridors, they are served by Pierce Transit’s major trunk Routes 2 & 3 with the highest frequency of service (Route 2 is at 20 minutes in the peak, Route 3 is 30 minutes in the peak). Additionally, with the completion of the City of Tacoma’s 25th Street improvements, Pierce Transit will operate bus service on 25th Street. We recommend this figure be updated to include all transit corridors, otherwise the information is misleading.

The recent ULI Rose Fellow Program participants providing recommendations on the MLK Hilltop Neighborhood Subarea Plan recommended east-west connections such as 6th Avenue, 9th Street, 12th Street and 21st Streets. Pierce Transit already provides many of these connections and will be actively working to communicate transit connections that we can help provide to the community. Those connections should be shown on this figure. Attachment 2 provides a map of the Downtown Pierce Transit network.

15. Subarea Plan, Page 132. The Public Transit section is fairly weak with regard to describing local public transportation services. Specific information describing Pierce Transit services could include: Local bus service is provided primarily by Pierce Transit. Pierce Transit generally operates routes at 20-30 minute frequencies in the peak through the Subarea. Routes provide direct connections with local service to UWT, Downtown Tacoma, the Stadium MUC, the Proctor MUC, Portland MUC, Lakewood, Parkland, and the Puyallup and South Hill Regionally Designated Centers.

16. Subarea Plan, Page 132. Footnote 1 indicates that “In 2013 Pierce Transit was forced to make severe cuts in service due to budget constraints, and future levels of service in the Subarea are uncertain.” This reference should be updated to reflect known information. Pierce Transit will complete a service reduction in September 2013 that will eliminate approximately 28% of today’s service levels. Pierce Transit can provide information related to routes serving the South Downtown area and the service levels today and after September 2013. With this service reduction funding in the six year plan is stable at the reduced level. The agency continues to seek funding to restore and improve service levels. As of April 29, 2013 one grant from WSDOT will provide $1.1 million over a two-year period to support 15 minute peak levels of service for Route 1 on Pacific Avenue from Parkland to Downtown Tacoma. Pierce Transit will continue to seek other sources of revenue and efficiencies to enhance service on other key corridors.

17. Subarea Plan, Page 137. Recommendation M-2: “Set the vehicle level of service standard to LOF “F” for the South Downtown Subarea.” Pierce Transit has serious concerns regarding this recommendation and the impact to public transportation service in the subarea and balance of the service area. Level of service F represents significant delay to transit operations that continue through the schedule and require additional time be added to each trip being impacted by this delay. In the subarea, over 500 trips travel along Puyallup Avenue each day, that does not take into account services on other major corridors in the subarea. These delays do represent a cost to public transportation services and ultimately would mean possible reduction of the service the agency is able to
provide. The DEIS indicates that this is not an impact to public transit. We disagree with that assessment. To mitigate this future impact, we recommend transit elements be included in future projects in the subarea such as dedicated bus lanes, queue jumps, Transit Signal Priority (TSP) technology. Attachment 1 is a concept Pierce Transit requests we begin to coordinate to offset the future impacts of this reduced level of service.

18. Subarea Plan, Page 137. Recommendation M-3: “Develop and implement a phased-in developer impact fee system to fund multimodal transportation infrastructure invested as South Downtown build.” Pierce Transit supports this type of developer impact fee to provide for the future build out of services. Similar to Pierce County Development Impact Fees, public transit should be exempt from this type of fee as we are building part of the solution and should not be penalized with our projects.

19. Subarea Plan, Page 138. Recommendation M-4: “Develop and implement regulations that require Transportation Management Programs with specific elements, triggered when new development exceeds predetermined threshold levels.” Pierce Transit supports this type of TMP effort to further encourage alternative modes of transportation and reduce SOV travel.

20. Subarea Plan, Page 138. Recommendation M-5: “As the Subarea redevelops, consider implementation of Universal Transit Pass Programs and/or a reduction of the employee threshold for the requirement of Commute Trip Reduction Programs.” Pierce Transit again supports this recommendation to encourage alternative modes of transportation. The title “Universal Transit Pass” is confusing as the Puget Sound Region already subscribes to the ORCA pass program which offers these types of programs and incentives. The subarea plan and DEIS should describe the existing ORCA program and how it can be utilized to provide Passport Programs and business accounts. Pierce Transit Business Accounts representatives are available to provide more detailed information and descriptions of the programs. Please contact Sharon Stockwell, business relations coordinator, at 253-581-8112 or sstockwell@piercetransit.org for additional information.

21. Subarea Plan, Page 139. Recommendation M-6: “Establish a program to provide area-wide parking management for South Downtown, including shared parking and pricing strategies.” The Subarea Plan indicates that “Pricing strategies should be based on an area-wide assessment.” Parking pricing and utilization at the Tacoma Dome Station multimodal facility are policy decisions that will be determined by Pierce Transit Board of Commissioners and Sound Transit’s Board of Directors. These facilities were constructed with Federal Transit Administration funds and local transit funds and are a priority for transit passengers. The DEIS document details the anticipated growth in transit trips in the subarea to increase from 14,146 to 77,296 by 2030 depending on the alternative. As noted in the subarea plan and DEIS utilization these facilities are already at 97% capacity and the agency receives repeated requests for additional capacity. Our agencies are interested in investigating potential pricing strategies to manage utilization
at the facilities and free up capacity for more transit users. These facilities are critical to provide an anchor to local and regional transit services operating from the subarea.

22. Subarea Plan, Page 140. Supplemental Parking Management Strategies, bullet 5, “Non-residential Off-street Parking Tax: To generate revenue for new transportation facilities and services and to reduce demand for parking, the City may advocate for state legislative authority to levy an annual per-stall tax on all off-street parking that is accessory to non-residential land uses. Such a tax might be graduated, with lower rates for property owners who unbundle parking or otherwise charge for parking at market rates.” Pierce Transit does not support this tax without an exception for public transportation facilities. Parking at these facilities is a critical element to build transit ridership, reduce regional congestion, and improve air quality. If such a tax were levied on public transportation facilities, it would be another impact to budget and could further degrade service to the community.

23. Subarea Plan, Pages 145-145. Complete Streets Projects – Puyallup Avenue. This section indicates, “Finally given the heavy use of Puyallup Avenue by Pierce Transit, Sound Transit, and Intercity Transit buses, extensive joint planning will be essential.” We concur with this comment. The prior paragraph with the description of the project continues to be weak in stressing the importance of transit on the corridor and does not call out possible transit supportive elements. With the proposed growth in the subarea and possible reductions in level of service, these transit supportive elements become more important for our agencies to be able to serve the subarea efficiently. We again recommend elements such as the conceptual configuration provided in Attachment 1.

24. Subarea Plan, Page 14. Recommendation M-11: “Implement Complete Streets reconfigurations of Puyallup Avenue, and Jefferson Avenue, and South C Street, in that order of priority.” Pierce Transit is supportive of complete streets configurations. Similar to the design of Pacific Avenue this corridor needs to take into account the transit elements which support pedestrian and bike activities. Page 3.11-1 of the DEIS describes the features of the Transit Priority typology and how it applies to streets that currently have or are planned for frequent bus service/streetcar. And that Pacific Avenue is the exception, as this downtown “Main Street” is designated as primary Pedestrian Street. The design of the Pacific Avenue corridor has considered transit service and accommodated features to support its use. Puyallup Avenue should also be such an exception with an accommodation for transit services that support the subarea and the region.

25. Subarea Plan, Page 148. Recommendation M-13: “Engage Pierce Transit and the University of Washington to develop a long-range plan for transforming Market Street into a transit-priority street.” Pierce Transit currently operates service along Market Street and proposes to continue to provide service along the corridor. As the UWT develops, and if Jefferson Street is no longer accessible to bus service, Pierce Transit’s Route 48 would shift to operate along Market Street. This aligns with Pierce Transit’s vision to provide service along multiple corridors in the Downtown area as we de-
emphasis operations along Commerce Street. Most streets with transit service would have one or two routes operating along the corridor.

26. Subarea Plan, Page 148. Recommendation M-15: Proactively collaborate with WSDOT on the new Amtrak station design to ensure that street blockage by trains is minimized, that a parking solution is found that does not compromise the desire for a walkable neighborhood...” Pierce Transit concurs with this recommendation and expressed similar comments in our response to WSDOT on the Point Defiance Bypass Project EA. Our comment letter to WSDOT also indicated Pierce Transit’s Tacoma Dome Station parking garages were not available for Amtrak passengers as the priority for those facilities is the services provided by Sound Transit and Pierce Transit.

27. Subarea Plan, Page 158. 1.3 Market Street Transit Priority Street. The funding section in this matrix indicates Pierce Transit as a funding source. Pierce Transit does not have this project identified in our capital plans or Transit Development Plan. Pierce Transit is always interested in partnering with the City of Tacoma or UWT as they apply for grants to construct streets or implement the UWT master plan. Pierce Transit is not able to construct street projects but we are able to partner with in kind support or passenger amenities.

28. Subarea Plan, Page 178. Figure 11-21 South Downtown Catalyst Project Sites. The label for project D2 appears to be located on Pierce Transit’s Tacoma Dome Station Multimodal Facility. It looks like that label should be shifted one block to the east to the East 25th and East G Street mattress factory site.

29. Subarea Plan, Page 178. Pierce Transit Site across from Freighthouse Square. Pierce Transit concurs with this comment and is interested in pursuing future development of the site as a TOD, mixed income housing or joint development project. We have partnered with the Tacoma Housing Authority to obtain a small grant to study feasibility of such a project. The feasibility study must be complete by December 2013.

30. Subarea Plan, Page 184. P9: Pierce Transit site (East 25th & East E Street) inaccurately indicates Pierce Transit wants to surplus this property. Please update these notes to indicate that “Pierce Transit is interested in pursuing TOD or joint development opportunities for the site.”

31. DEIS, Page 1-13. Public Transit summary. The summary for Alternative 1, Alternative 2 and Alternative 3 indicate that “At current and future levels, Tacoma Link, Sound Transit’s Sounder commuter Rail and ST Express bus service have the capacity to accommodate the projected growth in the transit trips. Nevertheless, the capacity of the local public transit system may be significantly constrained.” This comment is very concerning, particularly regarding local public transit service. We have multiple questions including: What are the factors for growth in service that were utilized to develop this conclusion? How are transit trips distributed through the various modes Tacoma Link, Sounder, ST Express Bus and local service?
32. Page 3.11-1 of the DEIS describes the features of the Transit Priority typology and how it applies to streets that currently have or are planned for frequent bus service/streetcar. The document indicates that Pacific Avenue is the exception, as this downtown “Main Street” is designated as primary Pedestrian Street. Pacific Avenue has considered and accommodated transit service and design elements to support the use of transit. Puyallup Avenue should also be such an exception with an accommodation for transit services that support the subarea and the region.

33. DEIS Page 3.11-2. Traffic Volume indicates that “Pacific and Puyallup Avenues are the most heavily traveled arterial streets in the subarea, with over 13,000 vehicles per day.” Given this volume of traffic and the project growth of traffic and delays in the subarea, the need for a dedicated transit lane to support the volume of transit trips is warranted.

34. DEIS, Page 3.11-6. Level of Service Standards. Pierce Transit again stresses the importance of accommodating transit service due to the impact of the delays and Level of Service F standards that would be accepted in the subarea.

35. DEIS, Page 3.11-7 & 3.11-8. General question, Table 3.11-2 and 3.11-3 highlight Vehicular Traffic, Summary of Regional Impacts and Vehicular Traffic, Regional Impacts, Alternative Comparison. Why are Transit trips not shown on these tables as well? The Travel Mode Share indicates that SOV and Carpool trips decrease through the alternatives but Transit and Walk modes increase. It could be an interesting comparison to see the transit trips featured on these tables as well.

36. DEIS, Page 3.11-7 & 3.11-8. General question: Do the Carpool Trips (Person Trips) include both private vehicles and Vanpool programs offered by public transit agencies?

37. DDEIS, Page 3.11-9 & 3.11-10. General question, Table 3.11-5 and 3.11-6 highlight Vehicular Traffic, Summary of Study Area Impacts and Vehicular Traffic, Study Area Impacts, Alternative Comparison. Why are Transit trips not shown on these tables as well for comparison purposes?

38. DEIS, figures 3.11-3 through 3.11-6: These figures provide data on the average traffic volume through the subarea. Each of these figures indicates that traffic volume along Puyallup Avenue will be more than double that along Pacific Avenue. And the DEIS indicates that transit trips will increase in the subarea. Again, these volumes of traffic indicate the need for transit supportive features similar to Attachment 1.

39. DEIS, Page 3.11-26: The third paragraph on this page indicates that “The above-noted proposed policy change to reduce LOS requirements on arterials is a key enabling strategy for achieving South Downtown’s goals to accommodate new residents and jobs and create walkable, transit-oriented communities. As South Downtown grows, an increasing share of trips will be accommodating by modes other than private auto, and as such, a lower priority on LOS for vehicle traffic is appropriate.” The Subarea Plan and DEIS also include the policy language which states that “In addition, priority treatment for transit and High Occupancy Vehicles (HOVs) will be provided within the arterial
corridors.” These priority treatments for transit have not been addressed in the plans and should be incorporated as mitigation before the final document is issued.

40. DEIS, Page 3.11-28. Universal Transit Passes: The concept of a Universal Transit Pass is called the ORCA card or program in the Puget Sound Region. Transit users in Pierce, King, Kitsap and Snohomish Counties as well as the Washington State Ferries, all have access to transit service with the same card. This is the card used for programs at universities such as UWT and major employers throughout the four-country region. The subarea plan and DEIS should describe the existing ORCA program and how it can be utilized to provide Passport Programs and business accounts. Pierce Transit Business Accounts representatives are available to provide more detailed information and descriptions of the programs. Please contact Sharon Stockwell, business relations coordinator, at 253-581-8112 or sstockwell@piercetransit.org for additional information.

41. DEIS, Page 3.11-38 provides a high level summary for the Affected Environment for public transportation. The description of local public transportation services and connections to and from the subarea should be expanded to better describe the services provided in the subarea. A matrix that summarizes today’s transit service is provided as Attachment 3.

42. DEIS, Figure 3.11-11 Bus and Rail Service Corridors in the South Downtown Subarea is difficult to read and does have inaccurate information for bus service. Key corridors that have bus service today are not including in this figure. Also, some corridors that do not have service show routes. Please update and provide additional street labels such as 6th, 9th, 12th, 15th, and Tacoma Avenue & Market Streets. Attachment 2 provides Pierce Transit’s current downtown Tacoma system map for reference.

43. DEIS, Pages 3.11-41 & 3.11-42 Tables 3.11-20 Transit Person Trips and Mode Share, Trips to Study Area and Table 3.11-21 Transit Person Trips and Mode Share, Trips Originating in Study Area. Does the data utilized to prepare this information differentiate between local and regional trips and can that information be shared with us?

44. Regarding the two tables referenced in question 45, it would be helpful to have a row or new table that combines the trips to study area and the trips originating in the study area. This calculation is provided for the Large Scale Buildout and No Action in the paragraph describing this section, documenting the data separately would be helpful as well.

45. DEIS, Page 3.11-42. Table 3.11-22 Transit Person Trips, AM Peak Period (1) Within Study Area and (2) Within TAZ’s Served by Tacoma Link. General Question, are the transit person trips projected in this table a combination of Bus Transit and Link person trips?

46. DEIS, Page 3.11-44. The page break after the second paragraph on this page is confusing. The readability and flow of the document would be easier if the mitigation measures on page 3.11-47 continued immediately after this section.
DEIS, Page 3.11-47. Unavoidable Adverse Impacts. The DEIS indicates that “With application of appropriate mitigation measures, no significant unavoidable adverse impacts are anticipated relative to public transit.” We disagree with this assessment. In addition to the mitigation stated in the document, the Final EIS should include mitigation to provide priority treatment for transit and High Occupancy Vehicles (HOVs) similar to those conceptually identified in Attachment 1. The increase in vehicle delay in the subarea, increase in traffic volume along Puyallup Avenue and the increase in projected transit trips all call for this priority treatment as mitigation.

Again thank you for the opportunity to review the Draft Subarea Plan and DEIS. If you have questions or require clarification regarding any of the comments above, please do not hesitate to contact me directly at 253-589-6887 or tlee@piercetransit.org.

Tina Lee
Capital Planning Manager

c: Lynne Griffith, Chief Executive Officer
    Monica Adams, Bus Stop Program
    Kelly Hayden, Service Planning Manager
    Justin Leighton, Government Relations Officer
    Carol Mitchell, Public Relations Manager
    Jay Peterson, Transit Development Acting Senior Manager

Attachment 1 – Puyallup Avenue Transit Enhancements Concept
Attachment 2 – Pierce Transit Service in Downtown Tacoma
Attachment 3 – Pierce Transit Service To/From Tacoma Dome Station
Attachment 1 - Puyallup Avenue Transit Enhancements Concept
Attachment 2 – Pierce Transit Service in Downtown Tacoma
<table>
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*March 2013 Bus Services Operating forgiven. Tacoma Dome Station Area*
The Tacoma City Council has initiated a process to develop a Subarea Plan and Environmental Impact Statement (EIS) for South Downtown. As a part of the process, we are soliciting the opinions of South Downtown residents, employees, and other interested parties. If you would like to provide your input, please circle your answers below, and either return this form to City Hall, or fold, tape, and mail it to the address on the back. This survey can also be taken online at www.cityoftacoma.org/southdowntownplan.

For additional information about this survey or the planning process please contact Ian Munce at the City of Tacoma, 253-573-2478, or imunce@cityoftacoma.org. Thank you!

Please rate the following aspects of existing conditions in South Downtown

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<td>Public spaces and plazas?</td>
<td>1 2 ✔️ 4 5</td>
</tr>
<tr>
<td>Public art and beautification?</td>
<td>1 2 ✔️ 4 5</td>
</tr>
<tr>
<td>Dome Business District in general?</td>
<td>1 2 ✔️ 4 5</td>
</tr>
<tr>
<td>Brewery District in general?</td>
<td>1 2 ✔️ 4 5</td>
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<table>
<thead>
<tr>
<th>Adequacy of existing development</th>
<th>very low / very high</th>
</tr>
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<tbody>
<tr>
<td>Overall South Downtown area?</td>
<td>1 ✔️ 3 4 5</td>
</tr>
<tr>
<td>Brewery District?</td>
<td>1 ✔️ 3 4 5</td>
</tr>
<tr>
<td>Dome District?</td>
<td>1 ✔️ 3 4 5</td>
</tr>
<tr>
<td>Foss Waterway?</td>
<td>1 ✔️ 3 4 5</td>
</tr>
<tr>
<td>University of Washington?</td>
<td>1 ✔️ 3 4 5</td>
</tr>
<tr>
<td>Hillside Neighborhood?</td>
<td>1 ✔️ 3 4 5</td>
</tr>
<tr>
<td>Nob Hill Neighborhood?</td>
<td>1 ✔️ 3 4 5</td>
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Please prioritize the following potential planning strategies for South Downtown
Economic development | very low / very high |
<table>
<thead>
<tr>
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<tbody>
<tr>
<td>Recruit retail?</td>
<td>1 2 3 4 ✔️</td>
</tr>
<tr>
<td>Recruit restaurants and entertainment?</td>
<td>1 2 3 4 ✔️</td>
</tr>
<tr>
<td>Recruit high-tech?</td>
<td>1 2 3 4 ✔️</td>
</tr>
<tr>
<td>Recruit professional services?</td>
<td>1 2 3 4 ✔️</td>
</tr>
<tr>
<td>Promote small, independent businesses?</td>
<td>1 2 3 4 ✔️</td>
</tr>
<tr>
<td>Where are the best opportunities for the above?</td>
<td>Brewery District; Dome District; UWT/Museum District; Foss Waterway; Hillside; Nob Hill</td>
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Housing | very low / very high
<table>
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<tbody>
<tr>
<td>Attract young adult households?</td>
<td>1 2 ✔️ 4 5</td>
</tr>
<tr>
<td>Attract young families with children?</td>
<td>1 2 ✔️ 4 5</td>
</tr>
<tr>
<td>Attract middle-aged families with children?</td>
<td>1 2 ✔️ 4 5</td>
</tr>
<tr>
<td>Attract empty-nester households?</td>
<td>1 2 ✔️ 4 5</td>
</tr>
<tr>
<td>Provide affordable housing?</td>
<td>1 2 ✔️ 4 5</td>
</tr>
<tr>
<td>Provide senior housing?</td>
<td>1 2 ✔️ 4 5</td>
</tr>
<tr>
<td>Where are the best opportunities for the above?</td>
<td>Brewery District; Dome District; UWT/Museum District; Foss Waterway; Hillside; Nob Hill</td>
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Arts, culture, and education | very low / very high
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<tr>
<td>Recruit arts venues?</td>
<td>1 2 3 4 ✔️</td>
</tr>
<tr>
<td>Promote arts-related businesses?</td>
<td>1 2 3 4 ✔️</td>
</tr>
<tr>
<td>Promote tourism?</td>
<td>1 2 3 4 ✔️</td>
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<tr>
<td>Support minority and immigrant communities?</td>
<td>1 2 3 4 ✔️</td>
</tr>
<tr>
<td>Support religious institutions?</td>
<td>1 2 3 4 ✔️</td>
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<tr>
<td>Expand educational opportunities?</td>
<td>1 2 3 4 ✔️</td>
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Sustainability | very low / very high
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<tbody>
<tr>
<td>Energy conservation?</td>
<td>1 2 3 4 ✔️</td>
</tr>
<tr>
<td>Water conservation?</td>
<td>1 2 3 4 ✔️</td>
</tr>
<tr>
<td>Stormwater runoff reduction?</td>
<td>1 2 3 4 ✔️</td>
</tr>
<tr>
<td>Recycling programs?</td>
<td>1 2 3 4 ✔️</td>
</tr>
<tr>
<td>Urban agriculture/community gardens?</td>
<td>1 2 3 4 ✔️</td>
</tr>
<tr>
<td>Reduction of greenhouse gas emissions?</td>
<td>1 2 3 4 ✔️</td>
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</table>
May 3, 2013

Mr. Ian Munce, Special Assistant to the Director
City of Tacoma
Planning and Development Services Department
747 Market St., Room 345
Tacoma, WA 98402
imunce@cityoftacoma.org

Re: Draft South Downtown Subarea Plan and EIS Comments

Dear Mr. Munce:

Thank you for the opportunity to participate in the community planning process and comment on the Draft South Downtown Subarea Plan and EIS. We hope our perspective will help the future build-out of the area proceed more smoothly and better address long-term public health concerns, risks, and benefits.

Tacoma-Pierce County Health Department and the draft Subarea Plan has many common goals:

- A holistic approach to planning for healthy, sustainable communities based on people, planet and prosperity;
- Improving active transportation and multi-modal connectivity within the area and adjacent neighborhoods; and
- Cleaning up contaminated sites to prevent hazardous exposures and encourage redevelopment.

Sewer, water, and transit infrastructure investments are vital to ensuring successful implementation of this plan. After reviewing the draft Subarea Plan, we have these questions:

- How does the plan build on and coordinate with Utilities’ protocols and capacities for infrastructure?
- How will the local public transit system accommodate projected transit trips, given funding challenges?

The EIS conclusions of "no significant unavoidable impacts" raise these questions:

- What impacts does the City consider "unavoidable" or insignificant, and acceptable?
- Given transportation funding challenges and current choices, what plan elements ensure that people will shift from using private automobiles to walking, biking, and transit, as assumed?

Our additional detailed comments on the plan and EIS are attached. We look forward to continuing to work with you to strengthen the benefits and reduce the risks associated with this project. Please contact Rob Olsen at (253) 798-2855 or rolsen@tpchd.org if you have any questions or would like to discuss our recommendations and suggestions.

Sincerely,

[Signature]

Anthony L-T Chen, MD, MPH
Director of Health

3629 South D Street
Tacoma, WA 98418-6813
Subarea Plan Comments and Questions:

Chapter 01: Introduction
P. 7—Vision statement is well-written. Recommend adding “safe” in the list of adjectives describing the bright future of the “community,” and “healthy food access” to the list of a robust range of services.

P. 7—The Big Picture
We’re delighted to see “healthy neighborhoods” outlined as a rising demand.

P. 10—Synergistic Neighborhoods
We recommend adding “diverse” in the bullet title, to recognize that encouraging inclusivity and diversity within each neighborhood is important to addressing health disparities.

Chapter 02: South Downtown Context
P. 37—Population
Good summary of demographic findings, describing that the area is now home to low-income and young adults with limited education and without children. The Plan should address potential impacts on current residents, such as possible displacement, and address needs such as services, affordable housing options and family-wage jobs. The Plan should include policies that help minimize impacts on the underserved populations.

P. 42-43—Development Capacity
Since the current average person per household (PPH) is around 1.54, a PPH of 1.7-1.8 may be more realistic and appropriate. Otherwise, residents’ may be displaced due to the introduction of housing built for a higher PPH.

P. 43-44—Capacity Testing
Have the potential development capacities credited from “in-city sending sites” under the proposed TDR been accounted for, if credits could be received within the same subarea?

Chapter 03: Policy Framework
P. 50-51—Strategy 1, Policy 1.1 and 1.3
We support the concept of “complete communities,” which is very similar to our Built Environment Program’s “healthy communities.” Defining this term would be helpful for the general audience.

There are many more components of “self-contained, healthy and sustainable” besides an integrated transportation system, such as inclusive and active communities, local economic activities, mixed land-uses, affordable and accessible healthy food, recreation and educational opportunities, and urban design.

Because creating complete communities is so important, “complete communities” deserves a standalone strategy and a set of corresponding policies, rather than embedded inside the Strategy 1. Perhaps it should even become the vision or the over-arching goal of the Plan.

P. 54-55—Strategy 3, Policy 3.2 or 3.3
Since there are so many stakeholders and agencies involved in open space planning and development in this subarea, consider adding a policy along the lines of “developing a joint open space connectivity development and management plan in partnership with public, non-profit and private agencies.”
City of Tacoma South Downtown Subarea Plan and EIS
Tacoma-Pierce County Health Department Additional Comments and Questions

Chapter 04: Land Use
P. 66—Expand the TDR Program
The Health Dept is in support of this expansion. In the long-run aside from using this expansion to preserve historic buildings, consideration should be given to the creation of urban open space, public realms or destinations for events and social gathering with the use of TDR. The types of public space effective for placemaking in an urban setting are broader than natural habitat corridors mentioned on P. 67.

Chapter 7: Brownfields
Does the City have Brownfields funding, if federal grants are not available? P. 105 – Introductory, 1st paragraph introduces the term ‘Brownfield’ but does not provide definition. ‘Brownfield’ is not a layman’s term, so ‘Contaminated Site’ should be used in lieu of ‘Brownfield’ until the definition for the latter is provided.

P. 105 – Background, 1st sentence: “Contaminated soils pose persistent (rather than immediate) health risks...”
P. 105 – Background, 2nd to last sentence on page: “In contrast, existing regulations require that contaminated sites be remediated once identified (rather than when redeveloped, though identification may occur during redevelopment).

EIS Comments:

Fact Sheet Required Approval
Under Tacoma – Pierce County Health Department please add “Water Well Decommissioning Permits.”

Section 3.1: Earth
Will major infrastructure investments be sited to reduce impacts from liquefaction, volcanic, and other hazards?

Section 3.5: Environmental Health
This section is largely consistent with Health Department interests and advocacy positions. We appreciate the recognition and referral to environmental health subject matter located elsewhere in the EIS, such as Solid Waste, Surface and Groundwater, Outdoor Air, etc.

Section 3.7: Land Use
P. 3.7-17—TDR
Can affordable housing be achieved via density bonus besides TDR? The way it’s now written appears to be allowable only under TDR.

P. 3.7-18—Designate Primary Pedestrian Street
Would the City consider the use of form-based code to advance and implement the policy intents of these streets?

P. 3.7-28—Transfer of Development Rights
The use of TDR to provide affordable housing was not specifically called out in this section here. Does City’s current TDR Program include such provision?

Section 3.8: Population, Housing and Employment
P. 3.8-1—Population
In addition to the comments previously provided by Cross-Cultural Collaborative of Pierce County, the EIS should speak to the possible negative impact of "involuntary displacement of existing low-income residents" upon redevelopment and demolition of underutilized or devalued properties.
May 3, 2013

Ian Munce, J.D., AICP
City of Tacoma
Planning & Development Service
747 Market Street, Room 345
Tacoma, WA 98402

Dear Mr. Munce:

Thank you for the opportunity to comment on the draft environmental impact statement (DEIS) for the South Downtown Subarea Plan project. The Department of Ecology (Ecology) reviewed the environmental checklist and has the following comment(s):

**TOXICS CLEANUP: Marv Coleman (360) 407-6259**

In the DEIS South Downtown Subarea Plan, page v of the Fact Sheet, reference is made to State Agencies potentially requiring approvals. Ecology is not listed. Ecology should be included: 1) It may be that some administrative action(s) will be needed to do site investigations and/or cleanups. These may consist of actions such as Agreed Orders, Consent Decrees, Enforcement Actions, or Voluntary Cleanup Program applications. 2) At the very least, Construction Stormwater General Permits will be needed for construction and/or remedial actions (unless, in the case of remedial actions, the work is being done under an administrative action that would exempt permits under RCW 70.105D.090. Non-remedial construction would still require these permits).

State permits that can be exempt under RCW 70.105D.090 include RCW Chapters:

- 70.94 – Clean Air Act
- 70.95 – Solid Waste Management
- 70.105 – Hazardous Waste Management
- 77.55 – Construction Projects in State Waters
- 90.48 – Surface Water Quality
- 90.58 – Shoreline Management

Also, some local and county permits may be exempt.

Section 3.5 Environmental Health of the DEIS does a good job of describing the process of addressing issues associated with contaminated soils under the Model Toxics Control Act (MTCA). However, it does not really address a method by which known or newly discovered contamination would be administratively handled to be in compliance with
MTCA. There are several methods noted in Part 1, above; there may be other possibilities that could be discussed. The City is encouraged to meet with Ecology at its earliest convenience to determine the best way to deal with contamination that is associated with a variety of properties within the South Tacoma Sub-area Planning District per Policy E-ER-7. Issues of particular importance include:

- Creating a **consistent and predictable** process for property owners, potential developers, and the City to address contamination issues.
  - Developing and using existing information to begin identifying data gaps and known issues.
  - Methods for reporting contamination to Ecology.
  - What will be expected for contamination reporting, Remedial Investigation/Feasibility Studies, Cleanup Action Plans and “No Further Action.”
  - Discuss what will be expected in the cases of multiple property contamination, co-mingled groundwater plumes, and plumes that have non-identifiable sources.
  - Identifying cleanup standards that will be acceptable, including alternative technologies such as capping and monitored natural attenuation.
  - Expectations for the use of institutional controls.
  - Identify circumstances that would cause a property or area to fall out of the Area Wide process.
  - Discuss Federal and State grant possibilities and processes.

**SEPA REVIEWER:** Sonia Mendoza  
**WATER QUALITY CONTACT:** Deborah Cornett (360) 407-7269

Any discharge of sediment-laden runoff or other pollutants to waters of the state is in violation of Chapter 90.48 RCW, Water Pollution Control, and WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington, and is subject to enforcement action.

Erosion control measures must be in place prior to any clearing, grading, or construction. These control measures must be effective to prevent stormwater runoff from carrying soil and other pollutants into surface water or stormdrains that lead to waters of the state. Sand, silt, clay particles, and soil will damage aquatic habitat and are considered to be pollutants.

This project may require a construction stormwater permit (also known as National Pollutant Discharge Elimination System (NPDES) and State Waste Discharge General Permit for Stormwater Discharges Associated with Construction). This permit is required for projects which meet both of the following conditions:

1. One or more acres of soil surface area will be disturbed by construction activities.
2. The site already has offsite discharge to waters of the state or stormdrains or will have offsite discharge during construction.

An application with instructions can be downloaded from Ecology's website at:  
http://www.ecy.wa.gov/programs/wq/stormwater/construction/- Application. Construction site operators must apply for a permit at least 60 days prior to discharging stormwater.
Ecology's comments are based upon information provided by the lead agency. As such, they may not constitute an exhaustive list of the various authorizations that must be obtained or legal requirements that must be fulfilled in order to carry out the proposed action.

If you have any questions or would like to respond to these comments, please contact the appropriate reviewing staff listed above.

Department of Ecology
Southwest Regional Office

(SM:13-1430)

cc: Marv Coleman, TCP
    Deborah Cornett, WQ
    Josh Klimek, HQ/HQ
May 3, 2013

Mr. Ian Munce, Special Assistant to the Director  
City of Tacoma  
Planning and Development Services Department  
747 Market St., Room 345  
Tacoma, Washington  98402

RE:    U.S. Environmental Protection Agency comments on the City of Tacoma and University of Washington Tacoma’s South Downtown Subarea Plan State Environmental Policy Act Draft Environmental Impact Statement (DEIS). (EPA Project Number: 12-4143-CED)

Dear Mr. Munce:

We welcome this opportunity to comment on the City and University’s planning for public and private development of the areas around the Tacoma Dome, Brewery District, Thea Foss Waterway, and University of Washington, Tacoma.

We agree that well-planned, ambitious, redevelopment toward a compact, mixed-use, transit rich community in South Downtown Tacoma would result in net environmental and community benefits. The benefits are many: compact development reduces development pressure on farms and wildlife habitat; mixed-use neighborhoods improve health by increasing the amount of people that walk and bike; transit options can improve economic well-being by reducing households’ transportation costs; and, increased development speeds the rate at which contaminated sites are cleaned.

We also agree that increased development in South Downtown Tacoma would result in especially positive impacts when considered at the regional scale. Your transportation modeling is telling; households in transit-rich urban centers drive less than households in car-dependent suburban areas. Decreasing per capita vehicle-miles traveled improves air quality by reducing vehicle emissions, including greenhouse gases.

For the above reasons, we support and appreciate your efforts. As you move forward, we recommend that the final Subarea Plan and EIS include additional information on how the City and University will maximize growth and livability in tandem. Consider, for example, developing monitoring questions, decision thresholds and responses for consistency with the HUD, DOT, and EPA Partnership for Sustainable Communities Six Livability Principles or other sustainable development principles as appropriate.
Thank you for this opportunity to comment and if you have any questions please contact me at (206)-553-1601 or reichgott.christine@epa.gov, or Erik Peterson of my staff at (206)-553-6382 or peterson.erik@epa.gov.

Sincerely,

[Signature]

Christine Reichgott, Manager
Environmental Review and
Sediment Management Unit
January 10, 2012

Ian Munce, J.D., AICP
Urban Planner, Long Range Planning Division
Community and Economic Development Department
747 Market Street, Room 1036
Tacoma, Washington 98402

Re: U.S. Environmental Protection Agency (EPA) scoping comments on the City of Tacoma’s (City) Notice of Intent (NOI) to prepare the Tacoma Dome/Brewery District Sub-Area Plan and State Environmental Policy Act Environmental Impact Statement (EIS). (EPA Project Number: 12-4143-CED)

Dear Mr. Munce:

We welcome this opportunity to inform you of issues we believe should be considered as part of the City’s planning for public and private development of the areas around the Tacoma Dome, Brewery District, Thea Foss Waterway, and University of Washington Tacoma. Our overall aim is to help maximize the benefits of combined investment from the City, Puget Sound Regional Council (PSRC) and the HUD, DOT and the EPA Partnership for Sustainable Communities’ (Partnership). Maximizing benefits of combined investment will increase the likelihood that the planning effort will result in better access to affordable housing, more transportation options, lower transportation costs, simultaneous environmental protection, and, equitable development.

Collaborating to maximize the benefits of combined investment, establish standardized and efficient performance measures, and, identify best practices is consistent with the EPA’s June 16, 2009 commitment to the Partnership.1 Our participation is also consistent with the Partnership’s 2011 Priority Area of Focus, “Continue to cultivate and support communities adopting and implementing livability principles.” According to this focus area, “The Partnership will help current grantees succeed by providing technical assistance and tools, building capacity in federal field offices, and giving grantees better access to local networks and resources.”2

Our interest in this specific SEPA EIS process stems from our belief that the City’s plan to build on the concepts and strategies described in the 2008 Tacoma Dome District Development Strategy Update, the 2010 Brewery District Development Concept Study, University of Washington Tacoma Master Plan and other existing studies, reports and policy documents will result in a plan that is consistent with the Partnership’s six Livability Principles.3 Because we expect consistency with the Livability Principles

1 http://www.sustainablecommunities.gov/pdfs/DOT-HUD-EPA-PartnershipAgreement.pdf
3 http://www.sustainablecommunities.gov/aboutUs.html#2
and because relative density increases in the Sub-

Area will have regional environmental benefits, we
believe increasing the likelihood of full implementation is more important than limiting the range of
activities that would be covered by the EIS. Too much flexibility at the individual project level, on the
other hand, may result in a transitional Sub-Area without enough livability characteristics to achieve the
City’s vision.

To facilitate the identification of an appropriate balance of flexibility and the most effective strategy for
full implementation, we recommend that the EIS describe the City’s approach to balancing development
flexibility with site specific design guidelines and mitigation measures. We expect the final Sub-Area
Plan to explicitly identify which design guidelines and mitigation measures would be required. A
conservative approach to impact analysis would only assume the implementation of required guidelines
and mitigation.

Most of the enclosed detailed comments provide our general expectations for environmental review
under the National Environmental Policy Act (Purpose and Need, Range of Alternatives, Standards of
Significance, Air Quality, Water Resources, Environmental Justice, Climate Change, Historic
Resources, Health Impact Assessment). Some of the enclosed detailed comments address issues more
specific to urban redevelopment (Legacy Pollutants, Indoor Air, Livability Measures (covered in
Transportation and Monitoring), Urban Forest Restoration, and, Urban Agriculture).

We would like to draw attention, in particular, to our enclosed comments on the development of
livability measures. As stated in the enclosed comments, 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. To this end,
we recommend that the City consider and describe in the EIS the applicability and usefulness of
cconducting implementation and effectiveness monitoring with a set of livability measures. See our
enclosed detailed comments on “Monitoring/Livability Measures” for suggested references; including a
recent EPA funded evaluation of draft sustainable community performance measures. One of the pilot
region’s evaluated, the Knoxville region, was a recipient of a Sustainable Communities Regional
Planning Grant from HUD and their experience could be especially valuable for the City and the PSRC
to consider.

We look forward to working with you on this project and if you have any questions please contact me at
(206)-553-6382 or peterson.erik@epa.gov.

Sincerely,

Erik Peterson
Environmental Review and Sediment Management Unit

Enclosures:
The EPA Detailed Comments on City of Tacoma’s Notice of Intent to prepare the Tacoma Dome/ Brewery District Sub-Area Plan and State Environmental Policy Act Environmental Impact Statement

Purpose and Need
The Purpose is the problem to be solved, the “what” of the proposal. It should be stated as the positive outcome that is expected. The Purpose must not be stated so narrowly that only one pre-selected alternative can fulfill the purpose. It should be stated broadly enough so that a range of reasonable alternatives can be considered and alternatives are not dismissed prematurely. The Need is the “why” of the proposal. The Need should establish evidence that a problem exists, or will exist, based on valid projections, and should be substantiated by facts and, where appropriate, quantitative analyses.

Range of Alternatives
The EIS should include a range of reasonable alternatives that meet the stated purpose and need for the project and that are responsive to the issues identified during the scoping process and to any identified goals and objectives. The analysis of alternatives in the EIS should compare the alternatives with respect to how well they respond to the stated need, issues, goals and objectives. This will ensure that the EIS provides the public and the decision-maker with information that sharply defines the issues and identifies a clear basis for choice.

We recommend the City incorporate into the action alternatives a range of planning concepts (building height and massing, open space, topography, connections/edges, circulation, land use) and/or design guidelines/mitigation measures (impervious surface area or vehicle miles traveled per capita or per job, green building certification etc.) in addition to a range of development intensity and density (number of units, square feet of office, retail and housing, acreage of open space).

Standards of Significance
According to 40 CFR Part 1502.1, “Purpose”, an Environmental Impact Statement, “…shall provide full and fair discussion of significant environmental impacts and shall inform decision makers and the public of the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the environment.”, and, “Agencies shall focus on significant environmental issues…”.

In order to facilitate a full and fair discussion on significant environmental issues, we recommend you consider developing and disclosing project specific standards of significance. The U.S. Department of Energy and Western Area Power Administration July 2010 DEIS on the Grapevine Canyon Wind Project provides a conceptual – and generally substantive – example. According to the Grapevine Canyon Wind DEIS, the “Standards of Significance” for Water Resources (Section 3.6.2.1) are as follows:
- Substantially degrade or contaminate surface water quality.
- Substantially deplete groundwater resources, including interfering with groundwater recharge.
- Cause a violation of the terms and conditions of a Federal, State, or local permit, including the loss or degradation of wetlands in violation of a USACE permit.
- Alter surface drainage patterns or stream channel morphology to the extent that vegetation communities and habitats are degraded or productivity is reduced for current resident species.
• Substantially alter the normal flow of a water body or normal drainage patterns and runoff, or impede or redirect flood flows from the placement of a proposed project component within a 100-year flood hazard area. (p. 133)\(^4\)

The associated environmental consequences analysis of the DEIS, then, is directly linked to the standards of significance. We believe this style of disclosure – direct linkages to standards of significance - may help to ensure that this Project’s SEPA document sharply defines all of the issues by focusing on a full and fair discussion of potential significant adverse environmental impacts.

**Air Quality**

Air quality impacts would include emissions from internal combustion engines during equipment operation, and fugitive dust from vehicle travel and site grading activities.

**Recommendation:**

The EIS should contain an analysis of emissions from construction, vehicle use, and equipment use, including estimated mitigated annual emissions. Emissions associated with on-site generation of electricity during construction should be included in this analysis.

The EPA supports incorporating mitigation strategies to minimize fugitive dust and toxic emissions, as well as emission controls for particulate matter (PM) and ozone precursors for construction-related activity.

**Recommendations:**

We recommend that best management practices, all applicable requirements under local or State rules, and the following additional measures be incorporated into the EIS, a Construction Emissions Mitigation Plan, and the Record of Decision. See the EPA’s Clean Construction USA website for additional information.\(^5\)

**Fugitive Dust Source Controls:**

• Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions. Install wind fencing, and phase grading operations, where appropriate, and operate water trucks for stabilization of surfaces under windy conditions.

• When hauling material and operating non-earthmoving equipment, prevent spillage, and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

**Mobile and Stationary Source Controls:**

• Reduce use, trips, and unnecessary idling of heavy equipment.

• Maintain and tune engines per manufacturer’s specifications to perform EPA certification levels, where applicable, and to perform at verified standards applicable to retrofit

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\(^4\) [http://www.wapa.gov/transmission/grapevine/DEISv1complete.pdf]

\(^5\) [http://www.epa.gov/cleandiesel/construction/]

4
technologies. Employ periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications.

- Prohibit any tampering with engines and require continuing adherence to manufacturer’s recommendations.
- If practicable, lease new, clean equipment meeting the most stringent of applicable Federal or State Standards.
- Utilize the EPA-registered particulate traps and other appropriate controls where suitable, to reduce emissions of diesel particulate matter and other pollutants at the construction site.
- Limit vehicle speeds on unpaved roads to 15 mph.

Administrative Controls:

- Identify all commitments to reduce construction emissions and incorporate these reductions into the air quality analysis to reflect additional air quality improvements that would result from adopting specific air quality measures.
- Identify where implementation of mitigation measures is deemed to be not implementable due to economic infeasibility and provide comparable determinations for other similar projects as justification for this decision.
- Prepare an inventory of all equipment prior to construction, and identify the suitability of add-on emission controls for each piece of equipment before groundbreaking. (Suitability of control devices is based on: whether there is reduced normal availability of the construction equipment due to increased downtime and/or power output, whether there may be significant damage caused to the construction equipment engine, or whether there may be a significant risk to nearby workers or the public.)
- Meet the EPA diesel fuel requirement for off-road and on-highway (i.e., 15 ppm), and where appropriate use alternative fuels such as natural gas and electric.
- Develop construction traffic and parking management plan that minimizes traffic interference and maintains traffic flow.
- Identify sensitive receptors in the project area, such as children, elderly, and infirm, and specify the means by which you will minimize impacts to these populations. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.

Air Toxics
There are a large number of human epidemiology studies showing increased lung cancer associated with diesel exhaust and significant potential for non-cancer health effects. To help disclose and mitigate potential human health impacts from Mobile Source Air Toxics (MSAT) – especially diesel exhaust - we are providing the following recommendations.

1. Discuss the cancer and non-cancer health effects associated with air toxics and diesel particulate matter. We believe that the resources listed below provide valuable background for this discussion.
a. EPA’s 2002 National Air Toxics Assessment  

b. Puget Sound Clean Air Agency’s Puget Sound Air Toxics Evaluation,  

c. Oregon Department of Environmental Quality’s Portland Air Toxics Assessment.  

d. Control of Hazardous Air Pollutants from Mobile Sources Final Rule  


g. Recent papers published and presented at the 89th annual Transportation Research Board Meeting:  

i. Simplifying the Estimation of the Health Impacts from Freight Activity in an Urban Environment  

ii. Bus Shelter Placement and Exposure to Particulate Matter for Waiting Transit Passengers  

iii. Results of a Comprehensive Field Study of Fuel Use and Emissions from Non-Road Diesel Construction Equipment  

2. Identify sensitive receptor locations, particularly parks, schools, hospitals, day care centers, etc.  

3. 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.).  

4. 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.  

5. Hotspot analysis for receptor locations for air toxics and particulate matter.  

Indoor Air  

We encourage the City of Tacoma to integrate lessons learned at High Point into EIS. Findings from the Breathe Easy project at High Point may be especially relevant for Sunset Terrace as the two public housing communities were constructed by the same developer at nearly the same time. See the EPA’s website on Indoor Air Quality for additional information: http://www.epa.gov/iaq/  

Water Resources  

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 discharges and pollutants likely to impact those waters (addressing both Section 402 and 404 discharges and potential impairments to water quality standards). The EIS must also disclose information regarding relevant Total Maximum Daily Load (TMDL) allocations, the water bodies to which they apply, water quality standards and pollutants of concern.  

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[8] http://www.deq.state.or.us/aq/toxics/pata.htm  
303(d) listed waters should not be further degraded. If additional pollutant loading is predicted to occur to a 303(d) listed stream as a result of a project, the EIS should include measures to control existing sources of pollution to offset pollutant additions.

Consider implementing watershed or aquatic habitat restoration activities to compensate for past impacts to water resources, particularly in watersheds with 303(d) listed waters where development may have contributed to impairments through past channelization, riverine or floodplain encroachments, sediment delivery during construction, and other activities that may have affected channel stability, water quality, aquatic habitat, and designated waterbody uses. Provisions for antidegradation of water quality apply to water bodies where water quality standards are presently being met.

Legacy Pollutants
*Phase I* and *Phase II* environmental site assessments should be conducted, as appropriate, in accordance with American Society for Testing and Materials standards. Please disclose the most recent findings from any relevant legacy pollutant studies in the EIS. We also recommend that the EIS discuss the City's proposed approaches for managing legacy pollutant issues in the Sub-Area. By disclosing the City's proposed approaches, the EIS will help to facilitate a broader dialogue aimed at finding creative solutions.

For more information about the EPA Region 10's Brownfield Program, please see the program's website at: [http://yosemite.epa.gov/r10/cleanup.nsf/sites/bf](http://yosemite.epa.gov/r10/cleanup.nsf/sites/bf)

Environmental Justice
Actions should be taken to conduct adequate public outreach and participation that ensures the public and Native American tribes understand the possible impacts to their communities and trust resources. Government agencies should also identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations, low-income populations, and Native American tribes. The EPA considers children, the disabled, the elderly, and those of limited English proficiency (LEP) to be potential EJ communities due to their unique vulnerabilities. For more resources on how to consider environmental justice, see references on the EPA's "Environmental Justice Considerations in the NEPA Process" website.12

Transportation
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 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.13 For more information on measuring the sustainability of streets and transportation contact the author of this letter for a copy of the memorandum to EPA Smartgrowth from ICF International, "Scoring Smart Growth Streets Literature Review – Findings"

13 [http://www.greenroads.us/](http://www.greenroads.us/)
The following resources may also help to assess/inform your transportation plan:

- Green Highway Partnership.\(^{14}\)
- The following references from the 89th annual Transportation Research Board Meeting.\(^{15}\)
  - *Carsharing’s Impact on Household Vehicle Ownership*
  - *Examining Transportation Impacts with a Multimodal Perspective*
  - *Catching a Ride on the Information Super Highway*
  - *Markets for Dynamic Ridesharing*
  - *How does the Built Environment Influence Pedestrian Activity and Pedestrian Collisions at Intersections*

**Adaptive Management, Mitigation and Monitoring**

Adaptive management is an iterative process that requires selecting and implementing management actions, monitoring, comparing results with management and project objectives, and using feedback to make future management decisions. The process recognizes the importance of continually improving management techniques through flexibility and adaptation instead of adhering rigidly to a standard set of management actions. For adaptive management to succeed there must be agreement to adjust management and/or mitigation measures if monitoring indicates that goals are not being met. Although adaptive management is not a new concept, it may be relatively new in its application to specific projects. As stated in a recent CEQ report, *Modernizing NEPA*, the effectiveness of adaptive management monitoring depends on a variety of factors including:

- The ability to establish clear monitoring objectives;
- Agreement on the impact thresholds being monitored;
- The existence of a baseline or the ability to develop a baseline for the resources being monitored.
- The ability to see the effects within an appropriate time frame after the action is taken;
- The technical capabilities of the procedures and equipment used to identify and measure changes in the affected resources and the ability to analyze the changes;
- The resources needed to perform the monitoring and respond to the results.

**Recommendations:**

We recommend that the EIS describe the potential environmental benefits of a formal Adaptive Management Plan. Such a plan should be designed to ensure the success of mitigation measures and to provide management flexibility to incorporate new research and information.

We recommend that the Adaptive Management Plan include a timeline for periodic reviews and adjustments, as well as a mechanism to consider and implement additional mitigation measures, as necessary, after the project is developed. Monitoring and evaluation should be used to determine if management actions are achieving objectives.

We recognize the Department of the Army’s mitigation and monitoring regulations at 32 CFR Part 651.15(b) and agree with the Council on Environmental Quality that these regulations provide a comprehensive approach to ensuring that mitigation proposed in the NEPA review process is completed and monitored for effectiveness. The Planning Guidance Notebook


Monitoring/ Livability Measures
We believe the Project presents opportunities to redevelop in a manner consistent with the HUD-DOT-EPA Interagency Partnership for Sustainable Communities’ (Partnership) six Livability Principles. Another aspect of the Partnership is the “Partnership Agreement”. In this agreement, HUD-DOT and EPA state their intention to “Develop livability measures and tools”.

We believe monitoring associated with the overall redevelopment effort is an opportunity to both learn about and learn from livability measures and tools. 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. Potentially useful general guidelines and resources for an effective monitoring strategy include, but are not limited to:

- Council on Environmental Quality’s “Draft Guidance for NEPA Mitigation and Monitoring”.17
- EPA’s Green Communities.18
- The U.S. Green Building Council’s Leadership in Energy and Environmental Design Neighborhood Development.19
- ICF International Sustainable Communities Performance Measures: Final Memo (contact the author of this letter for a copy).
- HUD DOT EPA Draft Evaluation of Proposed Sustainable Community Performance Measures (contact the author of this letter for a copy).

Plants and Animals
Urban Forest Restoration
Potentially beneficial urban forest restoration goals include, but are not limited to, the following:

- Enhancing connections to adjacent neighborhoods.
- Connecting wildlife/bird corridors and increasing habitat.
- Enhancing stormwater management, increasing water evaporation, reducing thermal heating effects and offsetting carbon emissions.
- Enhancing public open spaces and pedestrian corridors.

The 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. For more information on the human dimensions of urban forestry and urban greening see http://www.naturewithin.info/.

Threatened and Endangered Species

15 http://www.epa.gov/dced/partnership/index.html
18 http://www.epa.gov/greenkit/index.htm
The EIS should identify the endangered, threatened, and candidate plant and animal species, and, other sensitive species within the project area. The EIS should also describe critical habitat; 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 and National Oceanographic Atmospheric Administration National Marine Fisheries Service. 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.

**Invasive Species**
Ground disturbing activities create opportunity for establishment of non-native invasive species. 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.

**Land Use**

**Urban Agriculture**
Potential environmental benefits from urban agriculture include, but are not limited to: including but not limited to:

- Reduced food transportation costs and emissions.
- Water quality benefits from stormwater infiltration and water re-use.
- Food security.
- Economic opportunity.
- Community building.
- Increased supply of traditional foods.
- Reduced organic waste through on-site composting.
- Reduced food packaging waste.
- Increased opportunities for exercise.
- Reduced landscaping maintenance costs.

We recommend that the City of Renton consider urban agriculture and its potential benefits in the DEIS. Some issues to consider include the following:

- 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 which addresses:
  - The appropriate balance of individual ownership and shared spaces
  - Leadership and organizational structures and processes
  - Visual impacts from different urban agriculture practices (including untidy or weedy plots)
  - Erosion from rotating or unplanted areas
  - Insect and small mammal infestations
  - Water management (e.g., the difference between the water consumption of drought tolerant landscaping and urban agriculture)
Cost/benefit analysis of pesticide and herbicide use versus integrated pest management and organic agriculture
Adaptive management and mitigation of potential soil contamination.

In addition to numerous useful and up-to-date local resources on urban agriculture you may find the U.S. Department of Agriculture’s National Agriculture Library Alternative Farming Systems Information Center helpful.  

Climate Change
Ongoing climate change research as summarized by the United Nations Intergovernmental Panel on Climate Change concludes that climate is already changing; that the change will accelerate; and, that human greenhouse gas emissions, primarily carbon dioxide, are the main sources of accelerated climate change. Effects of climate change particularly relevant for this project includes changes in hydrology (including sea level rise) weather patterns, and, precipitation rates. Accounting for these effects will require adaptation, which is defined by the IPCC as the, "...adjustment in ecological, social, or economic systems in response to actual or expected climatic stimuli and their effects or impacts."

Recommendation:
We recommend that the EIS describe whether or not and how climate change considerations have influenced decisions (E.g., Project Design Features, mitigation measures, Alternatives development etc.)

Health Impact Assessment
Projects that have potential to substantially affect social, economic, and/or environmental conditions within communities may benefit from a Health Impact Assessment (HIA), or, at least, elements of HIA. HIA is a combination of procedures, methods, and tools that enables systematic analysis of the potential positive or negative effects of a policy, plan, program or project on the health of a population and the distribution of those effects within the population. HIA also identifies actions to mitigate negative effects. The potential need to address health is supported by the NEPA at Public Law 91-190, 42 U.S.C. 4321-4347, §4321 and §4331; by NEPA regulations at 40 CFR 1508.8, and 1508.27; by Executive Order 12898 on Environmental Justice; and E.O. 13045 on Children’s Health and Safety.

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. Environmental analyses often consider release of pollutants, contaminant exposure, and/or cancer risks, but other health impacts that could occur are often overlooked. For example, other health impacts that could occur include:

- Income from new jobs can have positive health impacts by increasing socioeconomic status or increasing access to health care. This income has also been associated with decreased access to health care by changing someone’s eligibility for public assistance programs. Income from new jobs has also been associated with increased rates of alcohol and drug use, and domestic violence

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and child abuse due to increased discretionary income, rapid social and community change (particularly in rural areas) and disrupted family structure due to unusual work schedules.

- Replacing low-income housing with high-cost housing can lead to negative health impacts on displaced populations, including increased incidence in chronic diseases, depression, and anxiety.
- Adding lanes to a roadway increases vehicle traffic volume and speed. This could result in increased motor vehicle crashes and increased severity of those crashes. Increased vehicle volume also affects air quality in neighborhoods adjacent to the road, potentially exacerbating the rate and severity of respiratory disease in vulnerable populations.
- Adding green space to a community, such as neighborhood parks, can lead to increased physical activity, which may lower incidence of obesity and cardiovascular disease, while providing a greater sense of well being and improved mental health for residents.

Health effects such as these have been documented, but are rarely addressed in environmental analyses.

When it appears that a HIA should be conducted, we recommend involving public health professionals early to assist in data gathering and analysis. Public health data and expertise may be available from local and state health departments, tribal health agencies, or federal public health agencies such as the U.S. Centers for Disease Control and Prevention’s National Center for Environmental Health, U.S. Agency for Toxic Substances and Disease Registry, or Indian Health Service.

Guidelines for conducting HIA are available from various sources, including:

- The World Health Organization (WHO) website provides links to many of these at: http://www.who.int/hia/about/guides/en/.
- The International Finance Corporation has developed detailed guidelines for conducting HIA. http://www.ifc.org/.

**Historic Resources**
The EPA recommends that no Finding of No Significant Impact or Record of Decision be completed until the processes of consultation, analysis, review and documentation required by Section 106 of NHPA have been fully completed. If adverse effects to historic properties are identified, any Memorandum of Agreement developed to resolve these concerns under Section 106 of NHPA should be referenced in the ROD.
Cheri,

Please treat this email as a comment letter.

Mr. Munce,

Hope all is going well and thank you for the opportunities to submit scoping and DEIS comments on the City of Tacoma and University of Washington Tacoma’s South Downtown Tacoma SEPA EIS and Subarea Plan. I am also happy that you and I were able to meet during the project’s scoping period in late 2011.

In both our scoping and in our recent EIS comments, we recommend livability performance measures and monitoring. Viccy Salazar, EPA R10’s Partnership for Sustainable Communities lead, just shared the attached message regarding HUD’s “Guidance on Performance Measurement and Flagship Sustainability Indicator Fact Sheets”. I’m passing this along to you as additional information on how one could implement our DEIS suggestion to “develop monitoring questions, decision thresholds and responses for consistency with the HUD, DOT, and EPA Partnership for Sustainable Communities Six Livability Principles”

Thank you for considering our comments and I would welcome any questions.

Erik Peterson
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Sustainability aims to "create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of present and future generations of Americans." - NEPA, 1969

From: Hoffer, Christopher J [mailto:Christopher.J.Hoffer@hud.gov]
Sent: Tuesday, May 07, 2013 11:08 AM
To: Salazar, Viccy
Subject: HUD Sustainable Communities Performance Indicators

These are what the HUD Regional Planning and Community Challenge grantees are measuring as flagship sustainability indicators. This was required for the 2011 grantees but optional for 2010, and HUD provided TA to help with this effort.

The full memo is online here:
Transportation Choice: Livable communities feature multiple, safe and convenient options for more people to walk, bike, or ride transit in addition to driving in their cars. Less driving alone means less congestion and less air pollution. Using alternative modes of transportation also leads to better public health outcomes as people naturally get more exercise.

Housing Affordability: Housing is the single biggest cost for American households, and the share of household income it has claimed has been increasing for decades. Reducing families’ housing costs is the way to make the biggest impact on people’s quality of life and financial sustainability.

Equitable Development: New growth and development should extend benefits to all community members. This includes creating more economic opportunities for low income residents as well as proactively addressing the potential for the displacement of low-income households that can result from neighborhood revitalization efforts.

Economic Resilience: A community’s ability to weather economic shocks depends on the stability, efficiency, and diversity of its economy. Regions can become more resilient by diversifying industry and
employment bases and increasing economic productivity per unit of energy consumption, which makes them more economically competitive and resilient to energy prices rises.

**Growth through Reinvestment**: Focusing new housing and commercial growth in areas that have already been urbanized helps to “recycle” vacant or underutilized land while increasing the vitality of existing communities and safeguarding rural landscapes. It also makes better use of existing public infrastructure while avoiding the expense of expanding infrastructure to new areas.

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