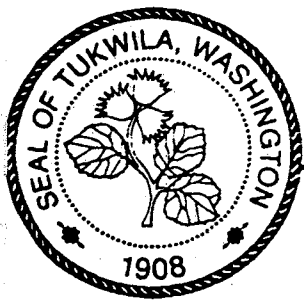

Tukwila Comprehensive Plan Final Environmental Impact Statement



**City of Tukwila
Community Development Department**

October 1995



City of Tukwila

John W. Rants, Mayor

Department of Community Development

Steve Lancaster, Director

October 9, 1995

RE: L92-0053 -- City of Tukwila Comprehensive Plan Environmental Impact Statement.

Dear Recipient:

This is the final environmental impact statement (FEIS) for the Tukwila's Comprehensive Plan. The proposed Plan is being prepared pursuant to the State Growth Management Act. The Plan continues to be reviewed by the Tukwila City Council.

This environmental analysis of the Plan has been completed pursuant to the State Environmental Policy Act. Eight comment letters on the Draft E.I.S. were received in a timely manner. Commentator issues included the coordination of land use and infrastructure, preserving Indian treaty rights, and protection of the natural environment.

Issuance of this FEIS has been coordinated with a public hearing on the proposed Plan. It is hoped that this document will help to develop constructive suggestions for improving the Plan. The public hearing will be held at the:

Tukwila City Council Chambers, 6200 Southcenter Boulevard

on October 16, 1995, at 7:00 P.M.

Recipients and other interested parties are urged to submit verbal or written suggestions at the hearing.

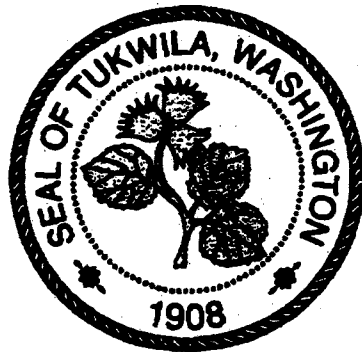
Please contact Vernon Umetsu (206-431-3684) for more information on the FEIS, or Ann Siegenthaler (206-431-3685) for more information on the Comprehensive Plan.

Sincerely,

A handwritten signature in cursive script that reads "Steve Lancaster".

Steve Lancaster
SEPA Responsible Official and
Director, Tukwila Department of Community Development

Tukwila Comprehensive Plan Final Environmental Impact Statement



**City of Tukwila
Community Development Department**

October 1995

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FACT SHEET

Project Title

City of Tukwila Comprehensive Plan
Environmental Impact Statement

File Number

L92-0053

Proposed Action

Adoption of the Tukwila Comprehensive Plan (the Plan) as per the Growth Management Act (RCW 36.70A) and in coordination with the overall planning framework of the King County Countywide Planning Policies. Upon adoption, the Plan will become official City policy guiding future decisions related to but not limited to land use, housing, transportation, and utilities within the municipal boundaries of Tukwila. The Environmental Impact Statement (EIS) for the Plan conforms with the Washington State Environmental Policy Act (SEPA) requirements for non-project or programmatic proposals. The contents of the EIS provide a level of detail commensurate with that of the Comprehensive Plan and incorporates by reference the components of the Plan.

The planning area is generally bounded by:

- North: The City's border with Seattle.
- South: The City's border with Sea-Tac at 160th and 164th Street, then further south to 204th.
- East: Generally by Martin Luther King Way and the railroad rights-of-way to S. 180th, then West Valley Hwy. to 196th St., and the Green River to 204th Street.
- West: Generally by Des Moines Way South and Military Road to 154th Street, then by the City's boundary with the City of Sea-Tac.

Proponent and Lead Agency

City of Tukwila
Department of Community Development
6300 Southcenter Boulevard, Room 100
Tukwila, Washington 98188

Implementation

Final Plan adoption by the Tukwila City Council is anticipated in October 1995.

SEPA Responsible Official

Steve Lancaster, Director
City of Tukwila
Department of Community Development
Telephone: 206.431.3670
6300 Southcenter Boulevard, Room 100
Tukwila, Washington 98188

Contact Person

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Tukwila, Washington 98188

Location of Documents

City of Tukwila Department of Community Development offices, located in Suite 100, 6300 Southcenter Boulevard, Tukwila, Washington. Office hours are from 8:30 a.m. to 5:00 p.m.

Comments on the Draft EIS

All comments should be addressed to:
SEPA Responsible Official
City of Tukwila
Department of Community Development
6300 Southcenter Boulevard, Room 100
Tukwila, Washington 98188
ATTN: Vernon Umetsu

EIS Authors

Prepared under the direction of the Tukwila Department of Community Development

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Mart Kask, Principal
500 Union Street, Suite 930
Seattle, Washington 98101
Telephone: 206.467.1444

Licenses/Permits Required

Adoption of the Tukwila Comprehensive Plan by the Tukwila City Council.

**Materials Incorporated
by Reference:**

**Background Elements and
Other Supporting Information for
the Tukwila Comprehensive Plan**

The following materials are incorporated by reference pursuant to WAC 197-11-635. Their content has been briefly described in Appendix B. All materials are available at the City of Tukwila Department of Community Development during normal business hours.

- Community Image
- Economic Development
- Housing
- Natural Environment
- Shoreline
- Annexation
- Residential Neighborhoods
- Transportation Corridors
- Tukwila Urban Center
- Manufacturing/Industrial Center
- Utilities
- Transportation
- Capital Facilities
- Roles and Responsibilities
- Community Resource
- City of Tukwila Centers Comparative Analysis
- Tukwila Tomorrow (Citizen Advisory Committee) Verbatim Minutes
- Tukwila Planning Commission Verbatim Minutes
- Tukwila City Council Verbatim Minutes
- Tukwila City Council Recommended Draft Comprehensive Plan (8/15/95)

Existing Documents

- Boeing Duwamish Corridor Redevelopment Environmental Impact Statement, 1992
- Tukwila Comprehensive Sewer Plan, 1991
- Tukwila Comprehensive Water Plan, 1991
- Tukwila Surface Water Comprehensive Plan , 1993
- Multi-Family Design Standards, 1992
- Tukwila Capital Improvement Plan , 1994
- Tukwila Six-Year Transportation Improvement Plan, 1995
- Tukwila Sensitive Areas Ordinance, 1991 et. seq.
Includes:
 - Tukwila Geologic Hazards Report, 1990
 - Tukwila Water Resources and Buffer Recs., 1990
- Tukwila Comprehensive Land Use Policy Plan, 1982

Date of Issuance of Draft EIS June 27, 1995

**Date of Written Comments
Were Due:** August 11, 1995 (Extended from July 27, 1995)

Date of Issuance of Final EIS October 9, 1995

Summary

The Proposed Action

This Environmental Impact Statement (EIS) serves to provide information to citizens and public officials about the potential environmental implications of a new comprehensive plan for the City of Tukwila. The City proposed "Tukwila Comprehensive Plan" has been prepared pursuant to the Growth Management Act (GMA) (RCW 36.70A), and in coordination with the overall planning framework of the King County Countywide Planning Policies. The Plan comprises 15 elements, six of which focus on the issue of land use. The Plan elements are:

Required GMA Elements

- Housing
- Utilities
- Transportation
- Capital Facilities
- Land Use
 - *Residential Neighborhoods*
 - *Transportation Corridors*
 - *Tukwila South*
 - *Tukwila Urban Center*
 - *Manufacturing/Industrial Center*
 - *Shoreline*

Optional Elements

- Community Image
- Economic Development
- Natural Environment
- Annexation
- Roles and Responsibilities

The State Act has 13 goals to guide plan development, and requires that all plans satisfy two standards:

1. Provide for the future fair share of housing, as cooperatively developed on a county-wide basis, and
2. Provide for an adequate ("concurrent") transportation system to support the plan's envisioned growth.

Alternatives Considered

For the purposes of this analysis, the two alternatives to the proposed action are the No Action Alternative and a special alternatives analysis for the Tukwila Urban Center. In addition, an alternatives analysis was conducted for the designated

Manufacturing/Industrial Center. Its contents and associated EIS are incorporated by reference into this document. These alternatives are presented below.

No Action Alternative

The existing Tukwila Comprehensive Land Use Plan represents the "No Action" alternative as per WAC (197-11-440(5)(b)(ii)). This plan includes general goals, objectives, policies, and a land use map, as well as a network of specific functional plans and single purpose ordinances which have been largely independently developed to implement the basic Comprehensive Land Use Policy Plan.

The existing Comprehensive Plan Elements are listed below:

- Natural Environment
- Open Space
- Residence
- Commerce/Industry
- Transportation/Utilities
- Comprehensive Land Use Plan Map
- Circulation Map (e.g., a road functional classification system)
- Historic Sites Map

These policies address the 13 State GMA goals. The existing Plan satisfies the fair share housing requirement as demonstrated in the residential capacity analysis of the Housing Background Element.

The transportation concurrency requirement is satisfied using SEPA to mitigate development impacts, generally to LOS E, as established in the "Tukwila Capacity and Deficiency Study (1989/1991)". Continuation of the existing plan would require specifically adopting an LOS standard within the Comprehensive Plan.

The existing Comprehensive Plan was last comprehensively updated in 1982. The City could significantly benefit from more specific policy direction, implementing strategies, an updated analysis of existing conditions, and an updated regionally coordinated development/ infrastructure strategy.

Policies of the No Action Alternative are as broad in scope as the Proposed Action. However, they are very significantly less detailed. Under this alternative, existing residential, commercial, and industrial land use designations would remain unchanged.

Alternative Designations for the Tukwila Urban Center

A special alternatives analysis was conducted for the Tukwila Urban Center due to its special, high-density nature. The City of Tukwila considered a range of alternatives for its urban center area to satisfy both regional criteria and local needs. The Proposed Action represents a hybrid of the alternatives presented in the discussion below.

- ***Urban Center, as defined by the Countywide Planning Policies (CPP).*** Maintains principal high-density characteristics of an urban center as defined in the CPP; proposes an average of 50 employees per gross acre and an average of 15 household per gross acre; oriented towards pedestrians and mass transportation, with less dependency on single-occupancy vehicles.
- ***Activity Area.*** Follows the principal medium-density characteristics of an activity area as defined by the CPP; however, analysis considered Tukwila's desired built environment for the center; proposes 15 to 25 employees per acre and an average of 5 households per acre; building heights limited to three to five stories and strong emphasis placed on providing access to mass transit.
- ***Commercial Area.*** Approximates the existing built form and land use mix of the study area; proposes a maximum of three-story building heights, with a mix of low-density regional commercial and industrial uses; supports auto-oriented development and densities of 17-20 employees per acre and .01 households per acre.

These alternative designations propose either lower or equal densities to the Proposed Action, and maintain similar land use mixes. The final proposed action represents a hybrid of the alternatives. As such, the discussion of the affected environment and impact analysis encompasses the characteristics of the alternative designations.

Were any of the three alternatives implemented individually it could be expected that they may create their own varying impacts. For example, a lower-intensity, auto-oriented commercial area would likely result in greater traffic, air quality, and surface water runoff impacts. Or, a higher-intensity urban center may create strains on public utilities and infrastructure, while having fewer impacts on traffic due to high-capacity transit and creating opportunities for urban open spaces.

Manufacturing/Industrial Center Alternatives Analysis

An alternatives analysis was conducted for the City's Manufacturing/Industrial Center. Entitled the Boeing Duwamish Corridor Redevelopment Project EIS (File EPIC-2191), the analysis examines a range of possible development scenarios for the corridor. The

lead agency for the project was the City of Tukwila, with participation from the City of Seattle and King County. The project's contents and its EIS are incorporated by reference into this document.

Summary of Environmental Impacts, Mitigation Measures, Significant Unavoidable Adverse Impacts, and Major Plan Issues

The following summary table highlights the environmental impacts, mitigation measures, significant unavoidable adverse impacts, and major plan issues associated with the proposed action. The information has been provided to highlight the analysis conducted for the Draft EIS. The Final EIS is being issued as an addendum to the Draft EIS. As such, no materials presented in the Draft EIS are resubmitted in this Final EIS.

SUMMARY TABLE

ENVIRONMENTAL IMPACTS

MITIGATION MEASURES

IMPACTS OF NO ACTION ALTERNATIVE

EARTH

The Proposed Action increases the development potential in several soil erosion prone areas, landslide hazard areas, and seismic hazard areas. Development in erosion prone areas contributes to water pollution. Development in landslide, seismic hazard and shoreline areas can result in significant damage to property, as well as the natural environment. Severe slides are possible when subsurface layers are overburdened by development and suddenly "let go."

Unavoidable Adverse Impacts. Growth will result in some degree of erosion and sedimentation. Growth also entails increases in the potential risk of damage to buildings and facilities from landslides, earthquakes, and flooding. Continuing existing regulatory controls and promoting the recommended mitigation measures will minimize negative environmental effects.

Mitigation measures include reducing the intensity of development in these hazardous areas to a level easily accommodated by the site, or recognizing and enforcing a rigorous development review process to ensure full impact mitigation. Project mitigating actions could include special piping in areas prone to erosion, and special drainage schemes in landslide and seismic hazard areas. Creative design solutions should be used including clustering, "special land form grading" requirements, and restoring vegetative cover.

Under the Proposed Action and No Action Alternatives, sensitive areas such as geologic hazard areas, erosion areas, and shoreline areas would be managed through existing City regulations such as the Sensitive Areas Ordinance (SAO) and the Shoreline Master Plan. However, the Proposed Action contains many additional policies aimed at managing geologic, erosion prone and shoreline areas. The Proposed Action could result in greater impacts because it increases the amount of developable land in Tukwila, and/or increases allowable densities of development in environmentally sensitive areas, if proper mitigation is not provided.

AIR QUALITY

Given the predominately urban character of the area, the presence of major regional highways, and the close proximity of uses such as airports and manufacturing zones, the City of Tukwila has many sources of air pollution. Auto emissions are the single largest source of air pollution in Tukwila, contributing carbon monoxide and particulate matter to the air. Other sources of air pollution in Tukwila include: Sea-Tac and King County International Airports, residential wood-burning stoves, lawn and garden equipment (which generates five times the pollutants of Sea-Tac aircraft), emissions from industrial/commercial sites, and construction sites. As Tukwila's population and employment grows, and as its importance as a regional hub for employment and shopping increases, degradation of the area's air may also increase.

Unavoidable Adverse Impacts. Most of the adverse impacts will result from increased vehicle emissions, and increased industrial and residential emissions. Some impacts can be avoided by implementing existing State and Federal regulations. Other impacts such as from residential power lawn equipment are not effectively addressed.

The City can pursue a variety of mitigation measures. First, the City should comply with all federal, state and regional air pollution control regulations. Reduced automobile emissions can be achieved through encouraging non-motorized transportation (walking and bicycling), and through mass transit (bus, rideshare, Dial-A-Ride, etc.). The City can also enhance its Commute Trip Reduction program. Other mitigation options include: working with the airports to limit aircraft emissions, tree planting programs, and public education programs.

Under both the Proposed Action and No Action alternatives, air quality is managed by federal, state, and regional regulations. However, the Proposed Action contains many policies designed to address the issue of air pollution. Emissions from automobiles, aircraft, and residential woodburning stoves would be the same under the Proposed Action and No Action alternatives.

ENVIRONMENTAL IMPACTS

WATER

Many threats from water, such as flooding, have been largely eliminated or are being effectively addressed (see Public Utilities section). The most significant exception is increased peak flows on hillsides due to single-family development replacing vegetative interception, detention, and transportation for flooding and periods of soil saturation which can cause down slope basement flooding and slope failure. The threat to identified valued water resources will increase as Tukwila becomes more developed, and development becomes increasingly dense.

The greatest threat to Tukwila's surface water quality is non-point source pollution. These pollutants are deposited in surface water resources by urban runoff, soil erosion, and direct atmospheric deposition. Point-source pollutants, such as industrial establishments and wastewater treatment plants, also contribute pollutants to surface water resources, but are subject to relatively effective regulation. Point-source and non-point source pollution can result in degraded water quality, water contamination, turbidity, and eutrophication. This, in turn, negatively impacts local terrestrial and aquatic wildlife. Threats to groundwater resources include surface water runoff, spills and leakages, underground storage tanks, household hazardous wastes, and abandoned mines.

Unavoidable Adverse Impacts. Increased pollution of water resources may be inevitable given forecasted growth in Tukwila. Impacts cannot be eliminated completely, but can be reduced controlled through some of the recommended mitigation measures.

PLANT AND ANIMAL LIFE (continues on to next page)

The primary potential impact upon plant and animal life, resulting from the Proposed Action, will be the disturbance of the terrestrial wildlife network. As development occurs, habitat may be reduced in area and/or quality. Tukwila's important habitats include wetlands, shorelines, water bodies, and steep slopes. Habitat in wetlands, shorelines, and steep slopes is threatened by encroaching development. Wetlands and water bodies are threatened by water pollution. Wildlife species of special concern are the red-tailed hawk and salmonids, both of which are threatened species. There are no known threatened plant species, although the loss of natural vegetation is undesirable.

MITIGATION MEASURES

The City has many mitigation options. First, the City must comply with all state and federal water quality regulations. The City can also reduce sedimentation by controlling soil erosion from current land use activities, and from future development sites. Special drainage facilities can be used to control urban runoff and reduce the incidence of flooding. Other mitigation options include: continued implementation of the surface water runoff management program; street cleaning; preserving and enhancing the water detention capability of natural wetlands; and public education. Increased hillside saturation periods is a long-term issue, whose realized impacts should be monitored.

IMPACTS OF NO ACTION ALTERNATIVE

Potential flooding and water quality impacts from flooding to water resources would be similar to the Proposed Action. Water resources under this alternative would be protected by federal and state regulations, along with the City's Sensitive Areas Ordinance. However, the Proposed Action contains additional policies aimed at managing and protecting water resources.

Should the Proposed Action be adopted, the City should pursue a number of mitigation options. First, clearing and grading during construction should be minimized to retain as much natural vegetation as possible. The City should also adopt a permanent Tree Ordinance. Other mitigation measures include: protection of wetlands and shorelines; cataloging of unique of significant plant and animal species; restoration of sustainable populations of anadromous fish in

Under the Proposed Action and the No Action Alternatives, threatened and endangered species are protected by federal and state regulations. Under both alternatives, plant and animal life, as well as habitat, are managed through the SAO and the Shoreline Master Plan. The Proposed Action contains additional policies to conserve plants, animals and habitat in its Natural Environment and Shoreline Elements. Because the Proposed Action increases the amount of land available for

ENVIRONMENTAL IMPACTS

Unavoidable Adverse Impacts. Population and employment growth, and the goals and policies that govern it, put pressure on wildlife habitat and existing natural vegetation. It can be expected that as growth continues in Tukwila, adverse impacts will occur to the area's plant and animal life. These impacts can be minimized to some degree by implementing a range of the proposed mitigation measures.

MITIGATION MEASURES

local streams and rivers; and incorporation of habitat areas and linkages in facility designs.

IMPACTS OF NO ACTION ALTERNATIVE

development, and/or increases development densities on hillsides, it will likely have a greater negative affect on remaining wildlife habitat.

ENVIRONMENTAL HEALTH: NOISE

Noise affects Tukwila land uses due to the proximity of both Sea-Tac and King County International Airports. Areas of the City which could be impacted by future expansion of both facilities include, Tukwila's west hill plateau, the proposed higher-density Pacific Highway Corridor, and the northern residential neighborhoods of Ryan, Riverton, and Allentown.

Another source of noise would be transportation rights-of-way (including highways, streets, and railroad lines). Because the City's proposed land use plan concentrates medium- and higher-density growth in existing higher "high noise" areas, population and traffic growth (and their accompanying noise) will be in fewer areas. Rail loading and marshaling yards add another source of noise to the City. Existing and future passenger rail systems also have the potential to marginally increase ambient noise conditions.

Proposed mitigation measures recommend developing and adopting an ordinance that identifies and designates noise-sensitive land uses, working with the Airports to develop mitigation strategies, participating in King County Airport master planning; working to institute Airport operational noise mitigation techniques; working interdepartmentally to ensure street speeds and truck traffic match proposed land use patterns; and examining the possibility to structure development to maximize noise proofing.

Increased noise levels will accompany increased development as part of either the proposed Comprehensive Plan or the No Action Alternative. Because of the City's highly urbanized environment and its close proximity to noise sources like Sea-Tac and King County International Airports, ambient noise will be high in either scenario. Implementation of the No Action Alternative would not affect enforcement of the City's noise ordinance or impact the City's ability to work with other agencies to abate aircraft-related noise sources.

LAND USE (continues on to next page)

Land use impacts involve possible effects associated with changes to comprehensive plan land use designations; consequences of land use changes on various areas of the City; and impacts to shoreline areas based on proposed uses.

The primary land use changes proposed by the Comprehensive Plan are the elimination of designated agriculture and public facility lands, and the creation of a Tukwila Urban Center. The largest significant actual use change is in Tukwila South where over 100 acres of existing lands designated for single-family use have been redesignated for multi-family residential and commercial/light industrial. This decrease was partially offset by increased single-family designated lands in the Riverton area.

The proposed Comprehensive Plan goals and policies generally serve to mitigate potential adverse land use impacts. However, to mitigate impacts associated with growth, the following mitigation measures are recommended: coordinate transportation and land use policies, particularly with respect to GMA concurrency requirements; prepare Capital Facilities Planning and the Capital Improvement in conjunction with the Finance Department and all affected City service providers; use the Shoreline Master

The No Action Alternative assumes that the existing land use and zoning maps would continue in effect over the next 20 years. There would be roughly similar impacts on the existing land use pattern due to the rough equivalence in land use designations with the Proposed Action. Notable exceptions in the Tukwila Urban Center, Pacific Highway Transportation Corridor, and Tukwila South were discussed earlier in "Alternatives Considered."

ENVIRONMENTAL IMPACTS

Proposed Comprehensive Plan land use designations may result in varying impacts to City of Tukwila neighborhoods. Conflicts may occur due to the unmitigated proximity of incompatible land uses, increased densities, and changes to the existing form of an area. Possible areas affected include: northern residential neighborhoods near Manufacturing/Industrial Center land uses; proposed low-density areas adjacent to Renton; proposed medium-density residential in South Tukwila; transformation of Pacific Highway from regional to neighborhood commercial; and proposed land use and built environment changes to the designated Tukwila Urban Center.

With respect to shoreline use, the Green/Duwamish River represents as a shoreline of statewide significance. City shoreline policies give priority to economic vitality of the MIC, and focus intense multi-purpose urban uses like water-oriented commercial activity and public access in the area where the Green River bounds the Tukwila Urban Center. The City's proposed shoreline management actions also emphasize other issues, including the creation of linkages to other areas of the region; wildlife habitat protection; and assurance of high-quality development.

Increased development intensity will require commensurably greater attention to high quality designs, and harmony with valued natural features and the surrounding built environment.

POPULATION AND HOUSING (continues on to next page)

Over the next 20 years, Tukwila will plan for a net increase of 5,388 new households, 2,973 of which would be outside the designated Tukwila Urban Center (TUC). The Plan proposes over 3,700 dwellings and allows additional accessory units outside the TUC. The TUC is zoned for the remaining units at 40 dwelling units per acre in over 800 acres. Proposed City zoning will facilitate that growth under either the Proposed Action or No Action Alternative. Impacts related to growth and land use compatibility will result from increased density. New areas for housing are planned for the Pacific Highway corridor and the Tukwila Urban Center. Creation of residential enclaves in these areas could pose possible impacts associated with traffic, noise, and air quality.

The development of housing in close proximity to higher intensity uses such as business parks, light industrial use, and heavy manufacturing should also be considered a significant impact. This situation occurs in several parts of the City (see Housing section for greater detail).

MITIGATION MEASURES

Program as an effective means for mitigating potential impacts to City shorelines; and prepare design and development standards in order to achieve the desired built environment in each area of Tukwila.

IMPACTS OF NO ACTION ALTERNATIVE

Tukwila's environmentally sensitive land uses and critical areas would still be protected through its sensitive areas ordinance and shoreline master program.

Conditions of new incompatible land uses adjacent to housing would also occur under the No Action Alternative. This Alternative would supply the residential capacity needed to meet the total number of non-Tukwila Urban Center households, thereby satisfying the Countywide Planning Policies. Existing programs would be in place to continue providing a range of housing types in the City. No Tukwila Urban Center housing requirements exists in this alternative.

The No Action Alternative would fail to implement several of the housing strategies in the Proposed Action that supports efforts to encourage affordable units at all rungs of the housing ladder, including

ENVIRONMENTAL IMPACTS

The issue of consistency between local housing policies and those established on a countywide level are another important issue for ensuring adequate supply at all rungs of the housing ladder. Chief among the concerns are the issues of supply, demand, and affordability. Plan policies state that the City will count its existing surplus of affordable units toward regulatory requirements for new growth and will monitor the condition. The City will continue to participate in the regional Comprehensive Housing Affordability Strategy (CHAS) and King County Housing consortium with staff and funding. City policies also call for allowing accessory units, reducing lot sizes for both market rate and affordable housing projects, and instituting a density bonus for affordable housing development.

It is possible that affordable housing provisions may be modified or eliminated from the ultimately adopted plan. Should this occur, the average cost of Tukwila housing would increase.

COMMUNITY IMAGE/AESTHETICS

The proposed Comprehensive Plan has the potential to affect the visual character of Tukwila in the following areas: developing an overall community image; defining the "small-town" features of the residential neighborhoods; recommending standards and guidelines to achieve the vision for the City's three major transportation commercial corridors; proposing land use designations and development standards to create an attractive, multi-faceted mixed-use environment for the Tukwila Urban Center; proposing development strategies and guidelines for the MIC; and instituting a network of parks, open spaces, and trails.

As the growth occurs, Tukwila will experience changes in the physical character of its residential, commercial, and industrial areas. As the City moves to higher densities, a range of visual impacts may occur, including the reduction of natural open spaces, alterations in the "sense of place" in various communities, and disturbance of viewsheds with increased building heights and densities, particularly in the Tukwila Urban Center. These potential impacts are balanced against Plan policies which provide for preserving historical, cultural, and natural resources, and promoting community identity via signage and gateways.

MITIGATION MEASURES

allowing homes on 5,000 sf lots, allowing accessory units, and instituting density bonus programs for affordable housing projects.

The following mitigation measures are proposed to minimize visual impacts associated with growth: design review for multi-family, commercial, and industrial development, and require streetscape designs to lessen visual impacts of development

The No Action Alternative would approximate the present level of zoned density and its community image/aesthetic impacts would be similar to those currently experienced throughout the City's residential and commercial areas. This means that the City would still have multi-family development design guidelines and an architectural design review procedure for the Southcenter commercial area. However, there would be much less design guidance than in the Proposed Action

ENVIRONMENTAL IMPACTS

PUBLIC SERVICES

Fire and Police. Impacts to public services focus on fire, police, schools, and human services. Tukwila's Fire and Police Departments indicate that increased densities in both residential and commercial areas could possibly effect their service capabilities. These impacts would primarily be related to the total volume of calls for service, and could involve the need for additional personnel and equipment. The Fire Chief indicates possible future need for a new 8-car apparatus and accompanying personnel. With respect to police services, the Department predicts that an increase in density will not, in itself, equate to a future need to increase personnel. The necessity for new officers and equipment will be assessed as the service demand dictates. If the community policing approach is successful, it may reduce the possible need for an additional patrol district (5 officers) and associated court/jail costs.

Parks and Recreation. Increased demand on public recreation resources (e.g., a regional park and pool facility, six neighborhood parks, and a community center) should be expected commensurate to a 50 percent household increase. A new community center and on-going park acquisition/development are activities underway to help satisfy future demand.

Schools. The South Central School District should expect increases in the number of school-aged children living within the district service area. As such, future capital facility improvements will need to be supplied to meet the demand of new children. In addition, the District's resource encumbrance of accepting dismissed or expelled students from other school districts may be further stretched as increasingly more students at risk arrive in the region and district.

Human Services. This City service provider may be impacted by increased growth as a portion of new growth are low-income families. Overall, the Human Services Office provides a coordinating resource to the City's needy constituents. The relative impacts associated with implementing the proposed action do not seem to significantly affect its service capacity. However, on-going monitoring of its service demands will need to be coordinated.

MITIGATION MEASURES

Mitigation measures recommended include potential development of a GMA Impact Fee for the South Central School District; preparation of a long-range strategic plan for the school district to meet the facility demands of new growth; continued interdepartmental coordination of the City's six-year financial planning program; further development of police and fire protection strategic plans to ensure efficient use of resources; and greater emphasis placed on addressing public safety issues through design criteria and other project review.

IMPACTS OF NO ACTION ALTERNATIVE

Public services are primarily impacted as growth occurs. Each of the public service providers would continue to meet the needs of Tukwila residents and businesses regardless of whether the proposed Tukwila Comprehensive Plan is implemented. The No Action Alternative would require fire, police, school, and human services at a similar level as the Proposed Action.

ENVIRONMENTAL IMPACTS

PUBLIC UTILITIES

Public utilities includes the following systems: water supply, sewer services, surface water drainage, solid waste, electricity, natural gas, and telecommunications. The water supply, sanitary sewer and surface water systems represent the major utilities impacted by growth. For each of these facilities, a separate analysis has been prepared to address supply, demand, and deficiency issues. While they each have their own varying degree of impacts, the majority of the identified problems relate to system deficiencies, distribution difficulties, service capacities, and general maintenance and operations. A complete listing of identified impacts appears in greater detail in the environmental analysis of this section.

Funding capacities for these major utilities is another potential impact. In the short-term, financing is available satisfy capital improvements proposed under the current six-year plan. In the long-term, shortfalls have been identified for each system. The City should monitor and review the load capacity impacts of growth. It will be the City's responsibility to ensure adequate service.

TRANSPORTATION (continues on to next page)

Much of Tukwila's land use pattern, and hence planning, has been linked with its major transportation corridors. Because of the strong interrelationship between the corridors and the surrounding residential and employment areas, transportation planning needs to be conducted in the context of proposed land uses. The Tukwila Urban Center and principal arterials are being monitored to ensure maintenance of the desired levels of roadway service. The policies of the Transportation Element suggest that the City has considered land use issues as part of its transportation planning efforts.

However, several conflicts occur between transportation goals and policies, and land use objectives. Pacific Highway represents an important consideration; as do increased residential densities. The Transportation Element addresses many of the issues between local and regional needs, and the effect of higher densities on the residential street network. The City's Transportation Element tries to resolve possible conflicts with useful implementation strategies, including a Roadway Mitigation Payment System, promotion of the Commute Trip Reduction Program, and possible opportunities to implement noise abatement techniques not only for roadways but also aircraft noise.

MITIGATION MEASURES

Service capacities for each utility is met either through a City-operated CIP program or through the plans of independent utility service providers. To mitigate potential impacts the following measures are recommended: review long-term demand and shortfalls as part of annual and six-year capital facilities planning; and telecommunications towers should be shared between different companies to minimize aesthetic impacts to the immediate neighborhood.

IMPACTS OF NO ACTION ALTERNATIVE

Each of the public utility providers, both City-owned and non-City-owned, would continue to meet the needs of Tukwila residents and businesses regardless of whether the proposed Tukwila Comprehensive Plan is implemented. The No Action Alternative may, in fact, have slightly lesser impacts due to lower population capacity permitted under existing zoning. However, that growth may be dispersed throughout the City rather than concentrated in targeted urban growth areas. This could result in both financial and service capacity impacts to several utilities.

Proposed mitigation measures recommend a range of solutions from roadway improvements and increased ridesharing to working with regional transit agencies and coordinating land use and transportation planning. Among the recommendations are an "average" LOS system to use a system-wide approach to evaluating congestion, a traffic impact mitigation payment system for the impacts of additional future traffic; specific arterial, HOV, and traffic signal operation improvements; transportation systems management and commuter trip reduction programs; working with Metro and the Regional Transit Authority; ensuring sufficient and effective alternatives to single-occupancy vehicles, particularly in the Tukwila Urban Center and transportation corridor planning areas; and ensuring implementation of a concurrency program.

A comparison of the year 2010 V/C with the existing system V/C reveals a significant drop in the level of service for the latter. If no action is taken or no improvements to the arterial system are made, the LOS drops significantly at the Tukwila Urban Center corridor line. The average LOS drops from D to F. The corridor serves as a measure of how easy it is to enter and exit the TUC on the seven arterial links and two freeway ramps providing this access. The average V/C ratio for the seven arterial links under existing conditions is 0.82 (LOS D). In 2010 with no improvements, the V/C ratio is projected to increase to 1.29 (LOS F). Traffic volumes at the CBD corridor line are forecasted to increase from current count of 142,753 (1992) to 173,654 in 2000, and 206,658 in 2010. All modes of vehicular travel, automobiles, buses, and service trucks, are negatively impacted without further improvements.

ENVIRONMENTAL IMPACTS

Impacts on the transportation system involve motorized vehicles, emergency access issues, public transit, and non-motorized transportation. The following summarizes the potential environmental impacts of each:

Motorized Vehicles. The Proposed Action calls for a number of arterial street improvements as well as improvements to streets providing access to the Tukwila Urban Center. A comparison of the proposed transportation plan year 2010 V/C with the existing system V/C shows a significant drop in the level of service, but an increase of the level of service when compared to the year 2010 V/C with no improvements. Several improvements are planned; however, many parts of the arterial street system will still not meet the LOS standard of E for commercial and industrial streets.

Future traffic circulation analysis will be based on a system basis rather than a single intersection or single road segment basis. This system approach requires use of a GMA impact fee ordinance. The average level of service 'E' is anticipated to primarily require impact fees in the Tukwila Urban Center and several other commercial road corridors. Residential areas are not anticipated to trigger an impact fee.

Low volume (single-family neighborhood) local access street design (28 to 30 feet wide) provides parking on two sides, and a 12- to 14-foot wide travel lane. It is to slow traffic and requires pulling aside for on-coming cars to pass each other. This will reduce through traffic, lower speeds, and increase pedestrian orientation. However, the Fire Department supports that all access streets should allow for a full-two way fire truck/car passing to allow safe, rapid vehicle movement. This would mean a minimum 36-foot wide road if two-sided parking is provided. The City will need to reach a policy decision on this issue.

Public Transit. The Proposed Action will increase the number and density of transit riders. Additional transit service from King County will be needed to capture these potential future riders, and realize the currently assumed 5 percent peak hour ridership. Failure to provide the additional service may require recalibrating the model for a smaller transit ridership and requiring more road improvements. In addition, a transit center(s) will be needed in the Tukwila Urban Center to create a destination where buses can collect at a given time.

(continues on to next page)

MITIGATION MEASURES

Increased residential area densities will require a more complete, inter-connected local access road network.

ENVIRONMENTAL IMPACTS

Non-Motorized Transportation. The Proposed Action envisions extensive improvements to residential area trails and sidewalks. Commercial area improvements are a combination of sidewalk improvements with transit and pedestrian supportive private development criteria. Both sets of improvements provide essential support for the transit system, as well as providing facilities for its own mode of travel.

MITIGATION MEASURES

IMPACTS OF NO ACTION ALTERNATIVE

Changes to Proposed Action Since Issuance of DEIS, and How those Changes Would Affect Impacts

Since the DEIS was issued in June, 1995, the City of Tukwila has continued to review and revise its proposed Comprehensive Plan. These changes are identified by means of "strike-throughs and underlines" in a draft dated August 15, 1995. This "strike-through and underline" text is available at the City of Tukwila Department of Community Development.

Most of the changes are minor and grammatical. In some cases, language was moved from one part of the Plan to another. Other changes, while important, do not affect physical development. There is no environmental impact associated with, for example, a schedule to periodically review the Plan. Other changes, though they relate to physical development, will not appreciably alter the distribution or nature of development, and therefore do not call for any amendment to the projection of environmental impacts contained in the Draft Environmental Impact Statement.

A two-step process was followed to determine how changes to the Plan might affect the Plan's environmental impact:

1. changes with potential to affect impact were identified
2. these noteworthy changes were analyzed for their potential to alter the environmental impacts projected in the DEIS.

Following are the noteworthy Plan changes, annotated as to their potential to alter the environmental impact.

Community Image

Policy 1.6.3, page 22

Summary

Short residential cul-de-sacs are no longer exempted from providing sidewalks.

Effect on environmental impact

Will increase pedestrian safety and mobility.

Goal 1.7, page 24

Summary

New goal and policies for high quality, pedestrian-friendly commercial districts.

Effect on environmental impact

If successfully implemented, would improve the environmental quality of those districts. A stronger pedestrian emphasis would help to reduce automobile traffic and air pollution impacts.

Deleted Former Goal 1.8, page 26

Summary

Goal and policies deleted that would have called for a civic center in the Pacific Hwy. Corridor.

Effect on environmental impact

No environmental impact.

Policy 1.10.8, page 28

Summary

Changed to not allow off-site satisfaction of recreation requirements in the Tukwila Urban Center.

Effect on environmental impact

Will cause recreation facilities to be located close to their intended users, which will increase convenience and reduce travel requirements. Precludes, however, the multi-development, area-wide pooling of recreation facilities. It may also reduce the development of housing at higher densities.

Deleted Former Policy 1.10.11, page 29

Summary

Deleted policy that would have allowed the sale of public property within or adjoining the open space network to adjacent property owners subject to no loss of public access or open space values.

Effect on environmental impact

Neutral.

Shoreline

Introduction to Shoreline Goals and Policies, page 60

Summary

New explanation of the City's Shoreline Master Program clarifies that newly annexed areas will remain under the jurisdiction of the King County until the City's Master Program is revised in 1996.

Effect on environmental impact

None.

Policy 5.1.1, page 60

Summary

Deleted the Open Space Environment as a Shoreline Environment Designation, and extended the Urban-Open Space and (5.1.2) Manufacturing/Industrial Center Environments from the 180th Street bridge southward to the south Plan area limit.

Effect on environmental impact

No likely environmental impact.

Policy 5.4.2, page 67

Summary

Residential properties along the Green River are excluded from having to provide public access. Furthermore, policy 5.6.2, on page 69, exempts short plats and smaller residential developments from providing private or public river access.

Effect on environmental impact

None.

Policy 5.6.5, page 70

Summary

Properties not in the King County Green River Trail Plan can satisfy their public access requirement through non-public natural areas.

Effect on environmental impact

None.

Residential Neighborhoods

Policy 7.3.2, page 84

Summary

New policy to combat short-term rentals that “increase the transient nature of specific neighborhoods.”

Effect on environmental impact

Could decrease the low-cost housing supply and increase the price of remaining units to low-income residents.

Implementation strategy, page 86

Summary

New implementation strategy: to require landscape planters in residential areas.

Effect on environmental impact

Will increase the pedestrian quality of residential areas.

Goal 7.7, page 92

Summary

New Comprehensive Plan Designation: “Residential Commercial Center.” This designation is intended to bring small commercial concentrations into residential neighborhoods. However, very little land is so designated on the map, and those lands are overwhelmingly, already designated for commercial uses.

Effect on environmental impact

None.

Goal 7.8, page 94

Summary

New policy promoting neighborhood vitality.

Effect on environmental impact

A successful program would tend to enhance neighborhood stability, the physical housing stock, and reduce the need for police services.

Transportation Corridors

Page 98

Summary

New discussion on how to improve the 99 corridor clarifies intent of that designation.

Effect on environmental impact

None.

Page 110

Summary

Increased explanation of the concepts behind the various transportation corridors and the Neighborhood Commercial Centers as pedestrian-oriented, with streetfront windows and attractive design.

Effect on environmental impact

None.

Tukwila South

Goal 9.2, page 117

Summary

Change in goal relating to residential development in Tukwila South: that it be low-density, not medium density. Also, the provision for office uses as a buffer between medium density residential and commercial districts to north and east has been deleted.

Effect on environmental impact
May decrease the ultimate housing potential, while also decreasing potential for impacts sensitive to density of development, such as soils erosion and traffic.

Tukwila Urban Center

Policy 10.1.4, page 129

Summary

New policy to limit residential as part of mixed use developments, to those parts of the Urban Center near surface water bodies. This replaces previous policies which allowed high density residential uses throughout.

Effect on environmental impact
None.

Manufacturing/Industrial Center

Deleted Former Policy 11.1.9, page 144

Summary

Deleted policy relating to urban design in the Manufacturing/Industrial Center.

Effect on environmental impact

Would limit the range and degree of improvements to the area's aesthetics and user amenities.

Deleted Former Policy 11.1.14, page 148

Summary

Deleted policy protecting King County International Airport from conflicting land uses.

Effect on environmental impact

Some land use conflicts are possible.

Utilities

Policy 12.1.11, page 157

Summary

New policy generally limiting utility service outside the city boundary to emergencies.

Effect on environmental impact

None.

Policy 12.1.30, page 161

Summary

New policy setting the Department of Ecology stormwater management standards as a minimum.

Effect on environmental impact

The effect on surface water impacts will be neutral or positive.

Policy 12.1.38, page 163

Summary

New policy requiring new utilities to be placed underground.

Effect on environmental impact

Will improve aesthetics while increasing development costs.

Transportation

Policy 13.2.3, page 170

Summary

New policy requiring most new developments to provide sidewalks.

Effect on environmental impact

Will improve pedestrian safety and mobility. It will also help to support transit (e.g., buses).

Capital Facilities

Goal 15.2, Page 193, and associated policies 15.2.1., 15.2.2, and 15.2.3

Summary

New provisions for the identification and siting of essential public facilities.

Effect on environmental impact

No direct impacts due to these provisions. Project actions will be reviewed at the time of proposal.

Comprehensive Land Use Map Legend, page 213-217 (changes to the mapping categories)

Summary

1. The "Office" designation has incorporated a wider range of complementary retail uses, but now excludes medium-density residential uses.
2. A new "Mixed-Use Office" designation is the same as the "Office" designation, but allows mixed use residential.
3. The "Neighborhood Commercial" designation is now "Neighborhood Commercial Center," but the basic concept is unchanged.
4. The "Riverfront" designation has been eliminated.
5. "Residential Commercial Center" and "Tukwila Valley South" categories have been added.
6. The previous draft showed a "Tukwila Urban Center Regional Commercial" designation and a "Tukwila Urban Center Commercial/Light Industrial" designation, both overlain by an "Urban Center Overlay." These two categories and overlay have been deleted, and that area is simply designated: "Tukwila Urban Center."
7. A "Tukwila Urban Center Mixed Use Residential" special overlay has been added for areas adjacent to Tukwila Pond, the Green River, and Minkler Pond. These are the only areas where residential use is allowed in the Tukwila Urban Center.

Effect on environmental impact

Changes to the mapping categories do not, in themselves, affect environmental impact, though how these categories are mapped may.

Summary Comprehensive Land Use Map (changes to the map itself)

1. Boundary of map has been extended to include area outside the city limits, to the intersection of Hwy 99 and S. Director St. This area is designated "Heavy Industrial."

Environmental Impact: Assuming the area would be devoted to heavy industry in any case, there is no environmental impact.

2. Land at the southeast quadrant of the SR 99/SR 599 intersection has been changed from "Light Industrial" to "Heavy Industrial."

Environmental Impact: Could result in increased impacts of the type that varies with intensity of industrial development, such as noise, vibration, air pollution, water pollution, and traffic.

3. The corridor running along 51st Ave. S. north of SR 518 has been changed from "Medium Density Residential" to "Low Density Residential" on the west, "Office" on the east.

Environmental Impact: No net environmental impact.

4. Land just southeast of the intersection of I-5 and Interurban Ave. has changed from "Medium Density Residential" to "Mixed Use Office."

Environmental Impact: No appreciable effect.

5. In the Tukwila South area, "Commercial Light Industrial" areas in the southwest have been redesignated "Mixed-Use Office" and "Low Density Residential". "Medium Density Residential" areas west of Orillia Road have been redesignated "Low Density Residential".

Environmental Impact: The land area available to commercial light industrial development has been reduced while the area available to office and low density residential uses has been increased. Overall, the potential intensity of development has been decreased in the southwest. No significant change in infrastructure needs or natural environmental impacts is anticipated.

Effect on environmental impact

The proposed infrastructure to support this Plan is still anticipated to be sufficient. Actual development will be subject to project-level SEPA review.

Comments Received & Responses to the Comments

Identified Commentator Issues Are Keyed to Responses

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Earl Clymer, Mayor

CITY OF RENTON

A

Planning/Building/Public Works Department

Gregg Zimmerman P.E., Administrator

July 27, 1995

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JUL 28 1995

COMMUNITY
DEVELOPMENT

Mr. Steve Lancaster
SEPA Responsible Official and Director
City of Tukwila
6300 Southcenter Boulevard, Suite #100
Tukwila, WA 98188

RE: TUKWILA COMPREHENSIVE DRAFT ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Lancaster:

City of Renton staff have completed their review of the above referenced environmental document and have identified two areas of concern. The first pertains to an issue we raised in our June 7, 1995 letter to you on the Tukwila Draft Comprehensive Plan. This pertains to the dissimilar uses along the Renton/Tukwila boundary. To quote from that letter:

"2. The Proposed Land Use Map dated April 6, 1995 shows the area north of SW 43rd St. which is contiguous to the Renton City Limit as Low Density Residential. The Land Use Map legend describes Low-density residential as "Areas characterized by detached residential structures, 0 to 6.7 units per acre."

"This designation is incompatible with the Renton adopted designation of Employment Area-Industrial. The Tukwila Residential Chapter Goals and Policies 7.1.1 through 7.5.7 set a direction for residential neighborhoods which generally are incompatible with industrial developments. We suggest that the use designation for this area be re-considered."

A-1

Unfortunately, it does not appear that the Draft Comprehensive Plan was changed and whereas the DEIS appears to acknowledge this land use conflict, e.g.

"The development of housing in close proximity to higher intensity uses such as business parks, light industrial use, and heavy manufacturing should also be considered a significant impact" (emphasis added).

It does not appear that proposed mitigation measures will be adequate to mitigate significant impacts from disparate land uses. "[E]xploring strategies for creating landscape buffers to minimize impacts when housing abuts incompatible land uses", for example, would appear to do little to address such probable impacts as light and glare, traffic, and noise associated with more intense land uses such as manufacturing and industrial.

The other probable significant adverse impact that could affect Renton pertains to Population and Housing. In the Summary Table on page xi it states:

"It is possible that affordable housing provisions may be modified or eliminated from the ultimately adopted plan. Should this occur, the average cost of Tukwila housing would increase."

If Tukwila eliminates affordable housing provisions we believe that this could have a substantial adverse impact on Renton's affordable housing if lower income persons displaced from the Tukwila housing market endeavor to find such housing in surrounding communities, usurping facilities planned for local populations. We believe that such impacts should be addressed in the FEIS or in a Supplemental EIS.

Thank you for this opportunity to comment on Tukwila Comprehensive Draft Environmental Impact Statement.

Sincerely,



Gregg Zimmerman, PE, Administrator
Planning, Building, Public Works Department

cc: Mike Kattermann
Don Erickson

A-2

A - Responses to City of Renton Letter

A-1. - The low density residential area located between two railroad tracks, north of SW 43rd Street, is predominantly high-value wetland, having been rated a number 2 wetland in the City of Tukwila Wetland Inventory, dated September 1989. Willow trees and red osier dogwood are dominant in forested portions of the wetland. Ground layer is mostly unvegetated; the area is probably seasonally flooded. Scrub shrub portions of the wetland are dominated by willow; emergent areas are dominated by common cattail. The area is separated from Renton land uses by a 100 foot wide railroad right of way. The low density designation is appropriate based on the site's physical characteristics and its separation from Renton land uses by a 100 foot railroad right of way.

A-2. - The City of Tukwila has not eliminated, but has modified, some of the goals and policies dealing with affordable housing. For example, the City made the following change to Goal 3.1: "~~Assumption of~~ Continue to provide the City's fair share of regional housing." Further, some of the Implementation Strategies were modified. For example, the City modified the implementation strategy for policy 3.2.7 as follows: "~~Accessory units with design standards~~ Allow an accessory dwelling unit in single family zones on lots with a minimum 7,200 square feet, integrated into the primary structure size, not exceeding 33 percent of the square footage in the primary residence, or 1,000 square feet, whichever is less, with an owner occupant on site, and satisfying various appearance and performance criteria related to impacts on adjacent properties." Taken individually and in total, the changes made to the affordable housing goals and policies do not significantly impact affordable housing conditions in neighboring municipalities.



Mayor
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Deputy Mayor
Terry Anderson
Councilmembers
Roger Anderson
Shirley Thompson
Frank Hansen
Kathy Gehring
Don DeHan

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July 27, 1995

Sent Via Fax and Mailed

Mr. Steve Lancaster, Director
Department of Community Development
City of Tukwila
6300 Southcenter Boulevard, Suite #100
Tukwila, WA 98188

Re: **COMMENTS ON THE PLANNING COMMISSION RECOMMENDED DRAFT
COMPREHENSIVE PLAN AND ENVIRONMENTAL IMPACT STATEMENT**

Dear Steve:

We had the opportunity to submit to you in June our early comments on the City of Tukwila's Planning Commission Recommended Draft Comprehensive Plan. We have reviewed the Draft Plan's EIS and find that many of our issues remain the same. This letter reiterates our comments on the Draft Plan and additionally comments on the Environmental Impact Statement. Again, overall, we are impressed by the vision, content, and readability of your Draft Plan; the substantial work of your Planning Commission, staff and citizen committees is evident.

The City of SeaTac's comments on the Draft Plan and Environmental Impact Statement are as follows:

ANNEXATION CHAPTER

- 1. Overlapping Annexation Area Boundary:** The area identified as Tukwila's Annexation Area has also been designated as one of SeaTac's Potential Annexation Areas and has been included on our City's Urban Growth Area Map. We would request that this fact be noted in the Annexation Chapter of your final Comprehensive Plan. (See the Map on page 73 of the Draft Plan and page 58 of the DEIS.) In addition, the map on page 58 of the DEIS incorrectly shows the annexation area extending south of S. 204th St. We request that this map be corrected in the final EIS.

B-1

2. **Uncertainty about Boundary Adjustments:** The Draft Plan states (see page 72) that the boundary between SeaTac and Tukwila "crosses Interstate 5 in several locations, creating difficulties for the reasonable development of private property." The draft document then suggests that Tukwila and SeaTac "will need to negotiate the issues and challenges of these border anomalies." While the City of SeaTac recognizes this issue, the Draft Plan is not specific about how and to what extent our two cities might negotiate "to eliminate boundary anomalies" as stated in one of Policy 6.1.7's implementation strategies.

B-2

We would request that discussions occur between our cities before the Tukwila Comprehensive Plan is adopted, in order to better define the extent of Policy 6.1.7 and to clarify the boundaries delineated on the Annexation Areas map (page 73).

TRANSPORTATION CORRIDORS CHAPTER

3. **"Pacific Highway Corridor":** As you know, Pacific Highway South is a major connection between the cities of SeaTac and Tukwila. Several policies (such as policies ## 8.1.10, 8.1.31 and 8.1.33) in the Draft Plan point to actions that would benefit from coordination between the two cities. We would recommend that representatives from each of our Planning and Public Works Departments staff meet to identify areas within the "Pacific Highway Corridor" in which both cities could coordinate efforts.

B-3

4. **Transit/Rail Station Location:** The City of SeaTac Comprehensive Plan envisions a high capacity transit station to be located within SeaTac in the area bounded by S.R. 518 to the north, International Boulevard to the east, S. 160th Street to the south and the "North Airport Access" highway R.O.W. to the west. As a result, Policy 8.1.24 would appear to be in conflict with our adopted Plan. We would request that this policy be removed or amended to indicate the location of the "transit facility" to be within SeaTac's borders, as described and adopted within regional planning documents and our Comprehensive Plan.

B-4

TRANSPORTATION CHAPTER

5. **Benefit of a Common Transportation Impact Fee:** The Draft Plan's Policy 13.7.2 focuses on using an "environmental mitigation system" for addressing transportation needs. The DEIS further states that future traffic analysis will involve use of a "GMA traffic impact mitigation payment system" to ensure that developments bear their fair share of improvement costs (page 111). The DEIS traffic analysis supports the need for such a system in that proposed transportation improvements (Table 17) are not enough to meet the adopted LOS standards of E for commercial and industrial streets and additional mitigating measures are necessary (DEIS, page 109). The City of SeaTac has adopted a transportation impact fee for new projects. We see great benefit in regional coordination of transportation financing and encourage ongoing communication on this issue. We recommend that Tukwila's Final Plan mention an impact fee system as one type of assessment to be considered by Tukwila.

B-5

PROPOSED COMPREHENSIVE PLAN/LAND USE MAP

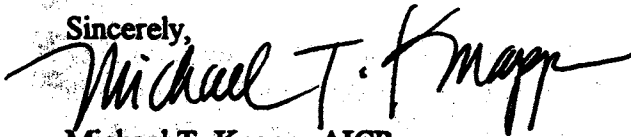
- 6. **Clear Delineation of the Potential Annexation Area:** On the proposed map ("page 197") The southern potential annexation area is not identified by the "asterisk" indicator for "Potential Boundary Adjustment and Annexation Areas." B-6
- 7. **Potential Boundary Adjustment Areas:** See the discussion under Comment #2. B-7

POPULATION AND HOUSING CHAPTER

- 8. **Projected Household Growth Discrepancy:** Tukwila's projected household growth of 2,300 to 3,000 households over the next two decades as stated on page 71 of the EIS and page 39 of the Draft Plan differs markedly from the projection of 5,388 new households over 20 years stated on page xi and page 74 of the EIS. It is unclear which forecast was used for the 2010 traffic analysis. This should be clarified. B-8

If you have questions about any of our comments, please feel free to contact me or Steve Butler, Principal Planner. The City of SeaTac looks forward to working with Tukwila to take the steps needed to meet our collective planning challenges.

Sincerely,



Michael T. Knapp, AICP
Planning and Community Development Director

cc: D. Scott Rohlf, City Manager
Stephen Butler, Principal Planner

g:\s\sepa\tukwila\comment7.-26

B - Responses to City of SeaTac Letter

B-1. - Your suggestion that the Annexation Chapter of the Comprehensive Plan be modified to reflect the noted overlap of SeaTac's adopted potential annexation area and Tukwila's proposed annexation area may be considered by the City Council as it undertakes its final deliberations on the Comprehensive Plan. Coordination of overlapping potential annexation areas is currently being addressed through a "potential annexation area program" being sponsored by King County Department of Development and Environmental Services. This program, currently in the early planning stages, is intended to provide predictability for future annexations and related land use decisions and ensure efficient provision of public services.

Please note the Comprehensive Plan may have been modified to show South 204th Street as the southernmost annexation border.

Final resolution of any contested annexation, including overlapping areas, would be settled by the King County Boundary Review Board. The Comprehensive Plan Map has been amended to show South 204th Street as the southernmost annexation border.

B-2. - Some increased difficulty in property development is anticipated due to the subject area's irregular boundaries. However, this is minimized to some degree because the corporate boundary follows property lines. Discussions between jurisdictions for the purpose of adjusting corporate boundary in difficult to serve areas are anticipated to take place in the future. However, due to time constraints, these discussions can not take place before the scheduled adoption of the Comprehensive Plan.

B-3. - Coordination of Pacific Highway South corridor transportation improvements is done within the context of the Metropolitan Planning Organization's regional transportation plan. Further coordination would occur when the City prepares implementation plans for the Pacific Highway South corridor. The City of Tukwila agrees that further coordination would be beneficial, and welcomes the opportunity to meet with SeaTac representatives.

B-4. - No specific location for a potential multi-modal transportation station along Pacific Highway South has been proposed. The potential site in the "vicinity" of Pacific Highway South and SR 518 provides flexibility for station location, therefore no conflict exists. No further detailing is appropriate at this time due to the uncertain future of the regional rail transit proposal.

B-5. - The City fully supports regionally coordinated infrastructure development and renewal. On DEIS page 110, the first bullet point under the heading "Proposed Mitigation Measures", discusses instituting a GMA-traffic impact mitigation payment system. Such a system helps to ensure that future developments bear their fair share of improvement costs. A more detailed discussion of the transportation impact mitigation system and a level of service analysis is presented in the "Transportation Element" background report which was incorporated by reference in the DEIS. Copies of the Transportation Element and other reports are available for review at the offices of the Tukwila Department of Community Development.

B-6. - The subject map is herewith revised to add asterisks to the areas between the existing City limits and South 204th Street. Boundary adjustment areas and annexation areas are shown in the Comprehensive Plan, page 77, Figure 9, of the Draft Tukwila Comprehensive Plan, dated August 15, 1995.

B-7. - See response to comment number B-2.

B-8. - The 5,388 household number was used in the traffic analysis. The difference between the 3,000 and 5,388 household projection is the number of households (2,388) being planned for in the Tukwila Urban Center.

GORDON, THOMAS, HONEYWELL MALANCA, PETERSON & DAHEIM

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July 27, 1995

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FOLLOWED BY REGULAR MAIL

Steve Lancaster
SEPA Responsible Official
City of Tukwila
Department of Community Development
6300 Southcenter Blvd., Room 100
Tukwila, WA 98188

Re: *Tukwila Comprehensive Plan Draft Environmental Impact Statement*

Dear Mr. Lancaster:

Thank you for the opportunity to comment on Tukwila's Comprehensive Plan Draft Environmental Impact Statement dated June, 1995. This letter is submitted on behalf of Baker Commodities.

SEPA requires that an EIS discuss alternatives for the comprehensive plan, including a general discussion of the impacts of alternate proposals for policies contained in such plans, for land use or shoreline designations, and for implementation measures. WAC 197-11-442(4). The Tukwila Draft EIS falls short of this requirement in several respects. First, except for the Urban Center and the MIC, the only alternative to the draft Comprehensive Plan is a no-action alternative. Since this alternative fails to meet even the minimum requirements of the Growth Management Act, it does not appear to be an true alternative. No other alternatives are even mentioned. Since other alternatives are not mentioned, no discussion of the impacts of alternate proposals is included.

C-1

1. **Land Use Designations**

The Tukwila draft EIS does not discuss the impacts of land use designations on the environment. None of the property that is designated industrial and located outside of the Manufacturing/Industrial Center has been analyzed as to its impact on the environment or the impact of changing its current land use to another land use. At

C-2

July 27, 1995

Page 2

best, the draft EIS simply rearticulates what is in the comprehensive plan. SEPA requires more.

C-2

2. Essential Public Facilities

Similarly, there is no analysis of essential public facilities. The only mention of essential public facilities is found on page 10 of the EIS, which states that Tukwila's Comprehensive Plan does not preclude the siting of essential public facilities within the City. As set forth more fully in my letter dated June 7, 1995 to Mayor John Rants and members of the Tukwila City Council, the Tukwila Comprehensive Plan directly and indirectly precludes the siting of essential public facilities. In any event, the draft EIS completely fails to describe how the comprehensive plan accomplishes the objective of providing for essential public facilities, the impacts that such a proposal will have on the environment, and implementation measures.

C-3

3. Solid Waste Management

The elements of the environment include both the natural environment and the built environment. WAC 197-11-444. The built environment includes, among other things, public services and utilities such as solid waste management. WAC 197-11-444(2)(d)(viii). There is little if any discussion in the draft EIS of the Comprehensive Plan's impact on the built environment.

For example, the draft Comprehensive Plan articulates as a goal to "encourage and actively participate in a uniform regional approach to solid waste management." The Draft EIS proclaims Tukwila's intent to comply with the King County Comprehensive Solid Waste Management Plan. [See page 101] The Draft EIS includes a brief description of some of the solid waste service providers in Tukwila on page 95. Conspicuously absent from this list is Baker Commodities, even though the King County Solid Waste Management Plan includes Baker Commodities as an integral part of a regional solution to solid waste management.

C-4

4. Shoreline Designations

The Draft Comprehensive Plan articulates a number of shoreline environment designations. The Draft EIS should analyze the impacts of these designations on the built environment, as well as on the natural environment. It does not. What analysis it does provide focuses primarily on the natural environment. For example, there is no

C-5

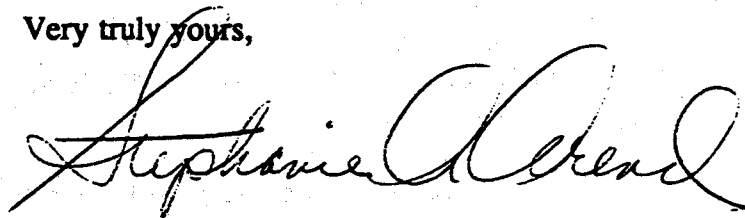
July 27, 1995
Page 3

discussion of the impact on existing uses of any particular shoreline designation and setback requirement.

C-5

Thank you for your attention. We look forward to receiving your response.

Very truly yours,



Stephanie A. Arend

SAA:gam

cc: Baker Commodities
Sandy Cole

C - Responses to Gordon, Thomas, Honeywell, Malanca, Peterson & Daheim Letter

C-1. - The no-action alternative in the Draft Comprehensive Plan is the existing comprehensive plan which contains policies addressing all elements listed in the Growth Management Act. As expected, the policies in the existing comprehensive plan are less detailed than the policies contained in the Draft Comprehensive Plan. The changes resulting in transitioning from the existing comprehensive plan to the GMA-driven Draft Comprehensive Plan are relatively small in Tukwila. Therefore, to artificially create an abstract alternative to meet the SEPA language requirement in WAC 197-11-442(4) is non-productive and unnecessary. The Urban Center and a Manufacturing Industrial Center areas are envisioned for significant changes, and alternatives for these areas were developed.

Taken together, the draft Plan, with incrementally changed areas and the significant Tukwila Urban Center and Manufacturing Industrial Center options, do represent several combinations of alternative comprehensive plans. Extensive discussion of alternative plan impacts and mitigating measures are discussed in the Draft Environmental Impact Statement. A further discussion of alternative policies and implementation strategies are presented in various background reports and in the minutes of the Tukwila Planning Commission and the Tukwila Tomorrow Citizen Advisory Committee.

C-2. - Land use impacts have been identified in the Draft Environmental Impact Statement. Specific changes in land use designation have been analyzed in depth in the respective subarea background reports, which were incorporated by reference into the Draft Environmental Impact Statement. The impacts of specific land use actions will be analyzed in project specific environmental reviews.

C-3. - The GMA requires that comprehensive plans contain a process for siting essential public facilities. This has been done in the Tukwila's Comprehensive Plan. GMA does not mandate that municipalities summarily site essential public facilities. Any proposed site specific essential public facility must to go through Tukwila's normal review process. Without a site specific proposal (essential public facility), no specific impacts and mitigating measures can meaningfully be discussed.

Goal 15.2 and policies 15.2.1 through 15.2.3 have been added to the Draft Tukwila Comprehensive Plan regarding the identification and siting of essential public facilities.

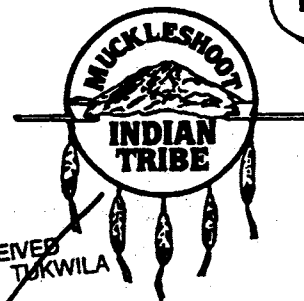
C-4. - The Draft EIS states Tukwila's intent to comply with the King County Comprehensive Solid Waste Management Plan. Although some solid waste collection services providers were listed on page 95 of the Draft EIS, a comprehensive listing is not required. To have specific solid waste service providers listed or not listed in the Draft EIS has little significance. However, Baker Commodities is herewith recognized as a processor of solid waste (animal) products.

C-5. - Shoreline management policies in Tukwila are designed to influence, sensitize, and regulate proposed development or construction in the river environment. An analysis of specific impacts on specific types of development is not within the scope of this programmatic EIS. Any legally pre-existing development which is not consistent with these policies or subsequent regulations would become legally non-conforming.



MUCKLESHOOT INDIAN TRIBE

FISHERIES DEPARTMENT



August 9, 1995

RECEIVED

AUG 14 1995

COMMUNITY DEVELOPMENT

RECEIVED
CITY OF TUKWILA

AUG 10 1995

PERMIT CENTER

RECEIVED FAX
COPY ON 8/10/95
YU

Steve Lancaster
City of Tukwila
Department of Community Development
6300 Southcenter Boulevard, Room 100
Tukwila, WA 98188

RE: Tukwila's Comprehensive Plan- Draft Environmental Impact Statement

Dear Mr. Lancaster:

The Environmental Division of the Muckleshoot Indian Tribe has reviewed the Draft Environmental Impact Statement (DEIS) for the City of Tukwila's Comprehensive Plan. Our general comments to the DEIS are as follows.

The City of Tukwila falls within the Muckleshoot Indian Tribe's "Usual and Accustomed Area" (Figure 1). Unfortunately, neither the Draft Comprehensive Plan nor the DEIS acknowledges the Muckleshoot Indian Tribe's jurisdiction over treaty-protected resources within and downstream of Tukwila's planning area. The DEIS does not consider as recommended by WAC 365-195-730 (1)(a) the potential adverse impacts to these treaty resources that may result in the impairment of treaty rights. King County County-wide Policy CA-15 also requires joint coordination between jurisdictions and federally-recognized tribes.

The FEIS should contain a separate section that addresses adverse impacts the Tribe's treaty rights under each alternative. The adverse impacts to analyze include: impairment of treaty fishing access; water quantity and quality impacts associated with increased urbanization; increased water supply development; decreased habitat for declining salmonid stocks; and a decline in the availability and accessibility of plant and animal resources. In addition, we recommend that the Comprehensive Plan be modified by adding the following language to the Shoreline and Natural Environment Elements sections:

"The City of Tukwila lies within the Usual and Accustomed Area of the Muckleshoot Indian Tribe. Land use decisions made by the City could adversely affect property and access rights protected by treaty and federally reserved water rights; therefore, it is essential that the City conduct coordination with the Tribe in a timely manner to avoid treaty right impairment. Coordination includes notification of comprehensive plan and policy changes, long term project planning, and site specific review."

Finally, the DEIS does not consider potential adverse impacts to archeological or cultural resources that occur within the Tukwila planning area. The Draft Comprehensive Plan recommends that an inventory be conducted and measures be taken to preserve these resources. Without such an inventory and land use policies that protect these resources, these resources could be adversely

D-1

D-2

D

Muckleshoot Indian Tribe - Fisheries Department Environmental Division
Comments to Tukwila's Comprehensive Plan DEIS

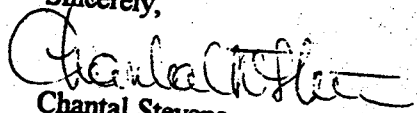
August 9, 1995

affected both in a site specific and cumulative way. The City should work with the Tribe's Cultural Resources Coordinator, Walter Pacheco, on this issue. He can be reached at 939-3319 extension 153.

D-2

Our specific comments for each section of the DEIS are enclosed for consideration. We appreciate the opportunity to review the DEIS and Draft Comprehensive Plan. If you have questions, please contact myself, or Karen Walter at 931-0642.

Sincerely,



Chantal Stevens
Chief, Environmental Division

Enclosures

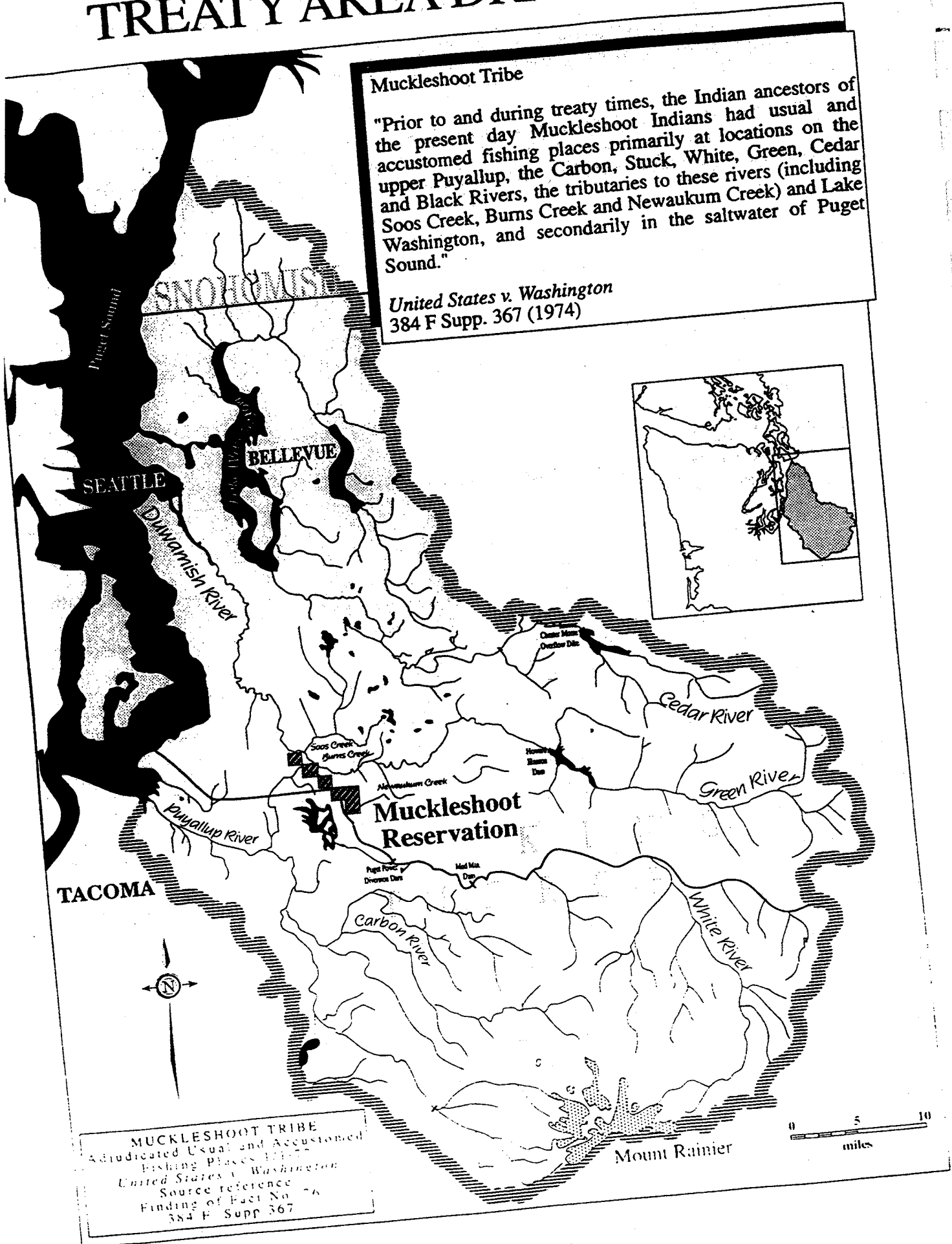
- cc: MIT - Walter Pacheco
- Ike Nwanko- WA Dept Comm. Trade and Economic Development
- Steve Keller - WDF/W

MUCKLESHOOT INDIAN TREATY AREA DRAINAGE

Muckleshoot Tribe

"Prior to and during treaty times, the Indian ancestors of the present day Muckleshoot Indians had usual and accustomed fishing places primarily at locations on the upper Puyallup, the Carbon, Stuck, White, Green, Cedar and Black Rivers, the tributaries to these rivers (including Soos Creek, Burns Creek and Newaukum Creek) and Lake Washington, and secondarily in the saltwater of Puget Sound."

United States v. Washington
384 F Supp. 367 (1974)



Summary and Proposed Action

Table 1

1. We disagree with the statement in Goal 8 under the Tukwila Comprehensive Plan Policies that "natural resource industries as defined by GMA and CPP do not exist in the City of Tukwila" (p. 9).

This statement ignores that fact that the Duwamish River within and downstream of Tukwila supports a viable tribal commercial fishing industry for salmonids. In addition, salmon spawned and reared upstream of Tukwila must pass through the City during migration periods. This statement should be corrected in the FEIS and the proposed mitigation to restore sustainable populations of anadromous fish should be identified in the FEIS. Goal 5.4 of the Comprehensive Plan should also be updated to reflect the fact that commercial, subsistence, and cultural fishing by the Muckleshoot Indian Tribe occurs within the planning area and there is the potential for conflicts unless projects are carefully planned and designed.

D-3

2. The summary section under Goal 10 refers the reader back to chapters 4,13, and 14 of the Comprehensive Plan. Therefore, the following comments pertain to these Chapters of the Comprehensive Plan.

a. Policy 4.1.2 discusses some of the impacts associated with stormwater management. There are additional impacts such as changes in water velocity and duration which should be added to this policy. See also our comments under impacts to water resources.

b. What are water resource area functions and values (Policy 4.1.4)? How will appropriate mitigation timing be implemented?

D-4

c. The use of wetlands for stormwater retention, biofiltration, and recreation could result in significant adverse impacts to the wetlands themselves and should be evaluated in the FEIS (Policy 4.1.8 of the Comp Plan).

d. Policy 4.2.1 indicates that Tukwila has not completed an inventory to classify and designated fish and wildlife habitat areas. How can the City designate and zone land uses without this information to avoid significant adverse impacts to these resources both site specific and cumulatively? This information should have been collected before the Comprehensive Plan was developed.

e. How is the City defining significant fish and wildlife habitats (Policy 4.2.1 of Comp Plan)?

f. The Comprehensive Plan does not currently contain policies to restore anadromous fish habitat and should to better achieve compliance with Goal 8 of the Growth Management Act. Anadromous fish habitat restoration should go beyond the preservation and restoration of appropriate vegetation plantings by including such actions as the daylighting and restoration of tributaries that are currently in pipes, the creation of side channel and overwintering habitat for rearing salmonids, etc..

D-5

g. In some places of the Comprehensive Plan fish habitat should be added to wildlife habitat (i.e. Goal 4.1 and Policy 5.1.1).

D-6

August 9, 1995

h. The Shoreline Element Policies will also affect the natural environment and should be evaluated in the FEIS accordingly.

D-7

Environmental Analysis

Earth

1. A map of the geological hazards should be included in the FEIS to document the location of these areas.

D-8

2. This section should be updated in the FEIS as follows:

“Sediment impacts to streams and salmonids can occur in four ways:

First, the increase in fine sediment can settle on the stream bottom and fill the inter-spatial cavities within redds and suffocate salmonid eggs. Second, the fine particles can settle in the bottom and “cement” the spawning gravel such that female salmonids are not capable of building a redd in the future which leads to production losses. Third, the fine particles that are held in suspension may cause behavior changes that lead due reduced growth, and increased incidence of disease (gill irritation) and mortality. Finally, any time that there is increased alga growth and a corresponding reduction in dissolved oxygen, then there is a reduction of oxygen availability and intake by fish.”

D-9

Ideally, Tukwila would have completed stream surveys to assess the current condition of gravels and streambeds before completing this DEIS. Without this information, it is quite possibly that site-specific and cumulative impacts will continue without appropriate mitigation.

D-10

3. On page 15, the DEIS indicates that development in Class I and II landslide hazard areas will be allowed if “biological evidence” indicates stability. This term should be defined and include a consideration of downstream receiving areas such as salmonid bearing waters.

4. The requirement to have the runoff rates from developed landslide areas equal the predeveloped runoff rate may not prevent future landslides. The runoff rate is only one factor that should be considered. Other factors include the location of retention and detention facilities; the amount of water to be stored; and the overall drainage network.

D-11

5. Development in Class III and IV landslide areas should be strongly discouraged, not minimized. The City should considering an open space program for these areas, particularly for those areas that could deliver sediment to the Green River and other waterbodies.

6. This section does not consider the existing conditions of waterbodies within Tukwila that may be adversely affected by increased sedimentation due to increased runoff and erosion as a result of additional growth and development. The Green and Duwamish Rivers are both on the Clean Water Act 303 (d) list for dissolved oxygen and other parameters.

7. Mitigation Measures

a. The piping of stormwater may result in adverse impacts at both the discharge location and downstream areas and should be considered in the FEIS.

b. In addition to the area clearing restrictions, the City should require timing restrictions as a mitigation measure for erosion and sedimentation impacts. The U.S. Department of Agriculture Handbook 531 (1978) indicates that there can be up to a 90% reduction in erosivity of rainfall if clearing and grading is restricted between September 1 through April 30.

D-12

August 9, 1995

Water

1. Water Quantity

The DEIS does not identify all adverse impacts due to an increase in impervious surfaces and increases in stormwater runoff. For example, the DEIS does not consider hydraulic continuity and the change in baseflows due to a loss of groundwater recharge. The FEIS should discuss this issue and also quantify the amount of existing impervious coverage in each drainage basin and the potential amount of coverage under each alternative.

Some of the impacts identified in the DEIS include channel scour and changes in stream channel conditions (deepening and widening). The DEIS fails to recognize that channel scour and streambed conditions can result in a loss of salmonid habitat and a reduction in salmonid productivity. Most stormwater manuals (including King County's) seek at reducing peak flows to minimize the impacts including habitat loss. However, there are additional stormwater impacts to salmonids which should be identified and mitigated for in the FEIS.

Stormwater detention and retention ponds do not prevent all direct and indirect impacts to salmonids. Release rates are often designed for channel stability and channel form, not for direct protection of fish. Besides increasing the unmitigated peak volumes of discharge, increasing impervious surfaces also creates new runoff events where previously no events existed (Booth, 1991). Such intermittent pulsing of the system will increase the effective number of storm events downstream fish are subject to.

Most storm events occur during colder months when juvenile salmonids are most stressed energetically and least able to maintain station in the water. Hence, the greatest threat of salmonid displacement and mortality exists when facilities are least capable of attenuating flows. The probability of juvenile salmonid displacement from streams, is, in part, a direct function of water velocity and duration of discharge exceeding sustainable swimming speeds and inversely related to the volume of available refuge habitat such as pools and side channels.

These direct impacts of displacement may result in indirect behavioral impacts. With increases in water velocities and duration, it is likely that juvenile salmonids will be required to shelter for extended periods of time and thus unable to feed. Growth rates are likely to decline and outmigrating smolts will be smaller and suffer greater mortality upon ocean entry. The changes in timing of flow that occur as a result of urbanization may also alter behavior such as outmigration.

Mitigation measures for the direct and indirect adverse impacts to salmonids include the construction or creation of overwintering habitat for rearing salmonids; the addition of large woody debris to provide instream slack water areas; and the reconstruction of former side channels to create off channel habitat.

2. Water Quality

The DEIS generally describes the potential impacts associated with development that can occur to waterbodies. However, there are documented problems for some of the waterbodies within Tukwila which should be discussed and analyzed in the FEIS. If basin wide information about water quantity and quality problems exists, then this information should be summarized in the FEIS. We encourage the use of tree retention and infiltration wherever it is possible to minimize water quality and quantity impacts.

D-13

August 9, 1995

Plants and Animals

1. The Green/Duwamish River also supports a viable coho fishery (pg. 37). Coho generally remain in freshwater for the entire first year of their life cycle and are dependent on adequate rearing and overwintering habitat. Tributaries within Tukwila's planning area that currently serve this function are extremely important. Tributaries that were once served this function should be considered for restoration.
2. There is the possibility that wild chum salmon may no longer exist within the Green/Duwamish River, based on genetic analysis; however, this information should be verified before any changes to the DEIS are made (pg. 37).
3. The re-establishment of the riparian corridor along the Green/Duwamish river is also an important objective of the Muckleshoot Indian Tribe (pg. 38).
4. The functional value of wetlands is not also equated with their size; rather, the location of the wetland within the watershed, the proximity to other types of habitats; the types of vegetation species, and other factors.
5. Wetlands generally provide rearing habitat for salmonids, not spawning habitat. If the City has data to indicate otherwise, we would be interested in reviewing this information (pg. 41).
6. Has Tukwila surveyed the streams to assess salmonid habitat and utilization? If so, we would appreciate a copy of this information. We would also be interested in working with the City to develop a comprehensive stream and habitat improvement program.
7. The significant adverse impacts to fish have not been identified clearly in the DEIS. The FEIS should identify and analyze direct and indirect impacts to fish in the plants and animals section. It is also likely that fish habitat will diminish as development increased in the Tukwila planning area which has implications for future salmonid populations and the Tribe's treaty rights.

D-14

Land Use

1. The DEIS points out that the City's shoreline policies give priority to the economic vitality to the Manufacturing/Industrial Center. The FEIS should consider the impact of these policies may have to impair treaty fishing access. There is a potential to significantly improve the riparian habitat along the Green River is restoration is made a priority. Any new development or redevelopment should be required to take such action. In addition, there are numerous voluntary measures that could be taken given education and planning. The Tribe has been successful working with various landowners to take such actions and could provide assistance to the City.

D-15

Public Utilities

1. The Environmental Division is interested in participating in any basin planning effort that the City may do.

D-16

D - Responses to Muckleshoot Indian Tribe Letter

In general, many important issues have been raised. However, many comments are focused at the level of developing specific regulations/programs or the application of regulations to specific projects. Such discussions and levels of analysis are not appropriate in a Comprehensive Plan EIS.

The City of Tukwila welcomes further discussions with Muckleshoot Tribal representatives during the future preparation of the Tukwila Shoreline Master Plan in 1996, and subsequent implementing regulations. Tukwila will continue to send notices of shoreline development to the Tribe. Specific responses are presented below.

D-1. - The Growth Management Act in WAC 365-195-730 recommends the consideration of the effects of federal authority over land or resource use within the planning area, including: (a) Treaties with Native Americans; (b) Jurisdiction on land owned or held in trust by the federal government; (c) Federal statutes or regulations imposing national standards; (d) Federal permit programs and plans. Not specifically mentioning the above listed four elements does not mean that these elements were not considered in the planning and environmental review process.

Coordination with the Muckleshoot Tribal government included (1) notice of public information meetings and public hearings held by Tukwila's staff, citizen advisory committee, Planning Commission, and City Council; and (2) consideration of written and verbal comments during Plan development. The City believes that it has considered the effects of federal/treaty land and resources within the planning area. This is in part represented by the goals and policies in the Shoreline and Natural Environment elements.

The detailed cumulative analysis of river and watercourse impacts is beyond the level of comprehensive plan impact analysis. However, the City will continue to automatically send the Muckleshoots notice of all shoreline substantial development permit applications, and will notify the Tribe of the annual comprehensive plan revisions. Any potential conflicts between treaty rights and comprehensive plan/regulatory provisions are most meaningfully resolved at a project specific level.

D-2. - The City does not have an archeological or cultural resources inventory, but does recognize the need to identify and protect such resources in Goal 4.6 and Policy 4.6.1. At the present time, this is done on a project specific basis. The City is concerned that early mapping of such resources increases the risk of degradation by "pot hunters." If the Muckleshoot Indian Tribe has such an inventory, the City is happy to consider it, and recommends that it also be submitted to the State Archaeologist.

Tukwila does refer projects to the State Archaeologist which are located in areas of high archaeological potential. SEPA checklists involving shoreline permits are also sent to the Tribe for review.

D-3. - The City recognizes that commercial, subsistence, and cultural fishing by the Muckleshoot Indian Tribe occurs within the planning area and that there is the potential for conflicts unless projects are sensitively planned and designed. This is discussed in goals 5.9 and 5.10 and their associated policies. Also see responses to comment D-13 and D-14.

D-4. - Policies 4.1.1, 4.1.2, and 4.1.3 address maintaining predevelopment water flows and quality from new development (and hence stream flows/velocity). Policies 4.1.4 and 4.1.5 address not degrading wetlands, and watercourse areas and their buffers. Wetland functions have been evaluated and rated as part of a citywide inventory (Tukwila Water Resources Rating and Buffer Recommendations), which was used in the preparation of this Plan. Additional biological evaluation, locational surveying and mitigation is required when new wetlands are discovered or development is proposed in proximity to inventoried wetlands.

D-5. - The Comprehensive Plan currently identifies important fish and wildlife habitat as defined by the State's Priority Habitats Program (Department of Fish and Wildlife) and this program is focused on identified Priority Species.

D-6. - This goal applies to both land and water habitats. Fish habitats are more specifically addressed in Goal 4.2..

D-7. - An analysis has been presented in the Water, Plants and Animals, and Land use elements of the environment. Further analysis will be prepared as part of developing Tukwila's shoreline master plan..

D-8. - A geologic hazards evaluation report for the City of Tukwila was prepared by Geo Engineers in 1990.

D-9. - The paragraph is herewith added to the analysis.

D-10. - The Tukwila stream survey was conducted in 1989 and 1990 by Jones & Stokes Associates and should be cited as the City of Tukwila Water Resources Rating and Buffer Recommendations. It was considered during plan preparation.

D-11. - All references to "landslide hazard" areas are herewith replaced with "areas of potential geologic instability" to better reflect their relationship to the Tukwila Geologic Hazards report which is their basis, and apply only to Class II, III, and IV slopes (where the potential is significant). Construction on such slopes generally requires geotechnical

studies which consider all development impacts in evaluating construction feasibility. Such evaluation is most meaningfully done at the project review phase.

The existing condition of wetlands, streams, and the Green/Duwamish River was considered in Plan development based on the City's inventory. Those conditions were also considered in preparing this DEIS and the inventory incorporated by reference. Also refer to D-4.

D-12. - See D-4. The timing of hillside construction is most meaningfully regulated during a project review.

D-13. - Significant urbanization exists both upstream and downstream within the Green/Duwamish River watershed. The sub-basin drainage watershed areas are also developed, and significant portions of the watersheds are located outside of Tukwila's jurisdiction. Consequently much of the impacts associated with stormwater runoff and non-point source pollution are in the upper watershed areas outside of Tukwila.

Coordination between local jurisdictions within an entire watershed may be the best way to address the overall water quantity and quality impacts potentially affecting the River. Currently, there is no known spawning activity within Tukwila, other than those species that use the River for habitat. There are few water quality problems documented in Tukwila. Many of the other comments in this section do not pertain to the existing conditions but present a restoration viewpoint.

D-14. - Again, the emphasis is focused on restoration of what was historically present for a thriving fishery. The City has conducted fish enhancement studies in a couple of its tributary drainage areas that did provide a fishery. Also, for most of the river bank work, the City follows King County's Bank Stabilization Manual recommendations which incorporate habitat enhancement and restoration techniques.

The City recognizes that wetland functional value assessment includes both qualitative and quantitative measures such as size, vegetative components, and habitat diversity. This is reflected in numerous proposed Natural Environment and Shoreline policies. However, it should be recognized that loss of wetland areas is often equated with loss of wetland function.

The City recognizes that the Green/Duwamish River provides important habitat for anadromous fish species such as salmon, steelhead, and cutthroat trout, that portions of this shoreline remain relatively undeveloped and provide excellent habitat within an urban environment for migratory and resident species, and that efforts to maintain or enhance these environment are appropriate. This has been reflected in numerous Natural Environment and Shoreline policies.

D-15. - The City recognizes the ability to develop properties with river frontage in a manner which does not violate treaty rights, and maintains or enhances the shoreline (see D-4). As part of this recognition, the Muckleshoot Tribe is automatically sent notice of shoreline permit applications.

D-16. - The Muckleshoot tribe will be invited to participate in the future (1996) shoreline master plan and river access plan work, as identified in the proposed Comprehensive Plan.

July 26, 1995

JUL 27 1995
COMMUNITY
DEVELOPMENT

Steve Lancaster, Director
Department of Community Development
City of Tukwila
6300 Southcenter Boulevard, Suite 100
Tukwila, WA 98188

Subject: Comments on Tukwila Comprehensive Plan Draft Environmental Impact Statement

Dear Mr. Lancaster:

We appreciate the opportunity to review the Draft Environmental Impact Statement (Draft EIS) for the proposed Tukwila Comprehensive Plan. The document responds well to the issues we raised in our scoping comment letter and appears to consider an adequate range of alternatives. We would like to offer the following comments to help clarify specific sections.

Air Quality

The statement on page 20 that "In strong likelihood, the primary sources point to aircraft and automobile traffic" overstates the impact of aircraft emissions on air pollutant levels. The Draft EIS points out on page 23 that both lawn and garden equipment and residential wood burning stoves contribute significantly higher amounts (four to five times) of air pollutants than aircraft. In addition, the Sea-Tac Airport Master Plan Update Draft EIS found that aircraft operating at Sea-Tac contribute less than one percent of the region's carbon monoxide, nitrogen oxides, and volatile organic compounds. Consistent with these findings, we suggest that the sentence on page 20 be revised to state that the primary air quality impacts are from automobiles and residential sources.

E-1

The discussion of air traffic emissions on page 23 misconstrues the impact to air quality of the proposed Sea-Tac third runway. Our concerns are with the sentence that states "With the possible construction of a third runway at Sea-Tac, air traffic at the facility will likely increase significantly as air traffic is stimulated, and lead to further localized air traffic emissions." The Airport Master Plan Update Draft EIS anticipates that air traffic will increase with or without a third runway, based on regional population and economic growth. A new runway would not noticeably change the amount of aircraft emissions as compared to the "do nothing" scenario. In comparison to 1994 levels, aircraft emissions would initially decrease due to the increased usage of newer, less-polluting types of aircraft and would not increase beyond current levels until between the years 2010 to 2020. I have attached Table IV.9-4 from the Airport Master Plan Draft EIS which presents the aircraft emissions data.

E-2

Seattle-Tacoma
International Airport
P.O. Box 68727
Seattle, WA 98168 U.S.A.
TELEX 703433
FAX (206) 431-5912

Environmental Health - Noise

On page 47, the number of air passengers in 1994 at Sea-Tac should be 21 million, instead of 16 million, and the forecast should be 24 million passengers and 379,000 aircraft operations by the year 2000.

E-3

The first sentence on page 48 incorrectly states that residential neighborhoods west of Pacific Highway partially fall within Sea-Tac's 65 DNL noise contour. Figure 3, the existing aircraft noise exposure map from the Airport Master Plan Update Draft EIS, shows that the only area of Tukwila within Sea-Tac's 65 DNL noise contour is a very small portion of the industrial area near the Duwamish River on the north.

E-4

The discussion of aircraft related noise on page 48 states that a new runway would result in as much as a 6.1 percent increase in dwelling units impacted over do nothing. Based on the data in Table 6, which was obtained from the Airport Master Plan Draft EIS, the correct figure is about 3 percent. It is also worth noting that none of the additional dwelling units would be within Tukwila. In fact, with or without a new runway, aircraft noise impacts on Tukwila will be less in the future than they are today.


E-5

The proposed aircraft noise mitigation measures discussed on page 55 call for working with Sea-Tac Airport and Boeing Field to develop strategies such as sound insulation of buildings, operational procedures for noise abatement, avigation easements, etc. As you may know, Sea-Tac already has a very extensive noise abatement and mitigation program which includes these measures as well as an annual noise budget, nighttime operations limitations, and noise and flight track monitoring.

E-6

Thank you for your consideration of these comments. If you have any questions, please call Troy Brown at 439-7707.

Sincerely,



Burr Stewart
Director, Aviation Planning

TABLE IV.9-4

Seattle - Tacoma International Airport
Environmental Impact Statement

AIRCRAFT EMISSIONS INVENTORY

(Tons per year)

Pollutant	1994	2000	2010	2020	1990 SIP ^{1/2}
	<u>Existing</u>	<u>Do-Nothing</u>	<u>Do-Nothing</u>	<u>Do-Nothing</u>	
CO	1,365	975	1,245	1,874	3,605
VOC ^{3/}	407	229	341	580	836
NOx	1,378	1,234	1,525	2,047	1,400
SOx	55	44	51	70	N/A
PM10	0.23	0.04	0.04	0.05	N/A

Year 2000	2000	2000	2000	2000	1995 SIP
	<u>Do-Nothing</u>	<u>Alternative 2</u>	<u>Alternative 3</u>	<u>Alternative 4</u>	
CO	976	987	986	993	5,880
VOC ^{3/}	229	232	232	234	1,092
NOx	1,234	1,234	1,234	1,235	2,476
SOx	44	44	44	44	N/A
PM10	0.04	0.03	0.03	0.03	N/A

Year 2010	2010	2010	2010	2010	1995 SIP
	<u>Do-Nothing</u>	<u>Alternative 2</u>	<u>Alternative 3</u>	<u>Alternative 4</u>	
CO	1,245	1,252	1,249	1,268	5,880
VOC ^{3/}	341	343	342	349	1,092
NOx	1,525	1,524	1,524	1,525	2,476
SOx	51	51	51	51	N/A
PM10	0.04	0.03	0.03	0.03	N/A

Year 2020	2020	2020	2020	2020	1995 SIP
	<u>Do-Nothing</u>	<u>Alternative 2</u>	<u>Alternative 3</u>	<u>Alternative 4</u>	
CO	1,874	1,838	1,833	1,854	5,880
VOC ^{3/}	580	574	574	578	1,092
NOx	2,047	2,008	2,006	2,009	2,476
SOx	70	69	69	69	N/A
PM10	0.05	0.04	0.04	0.04	N/A

1/ Non-highway mobile projections for 1995, Emissions Inventory for Carbon Monoxide and Precursors of Ozone for King, Pierce and Snohomish Counties, Washington State, Puget Sound Air Pollution Control Agency, September 1994.

2/ King County SIP Inventory, includes military, commercial, general aviation, and commuter aircraft for Sea-Tac only.

3/ Volatile Organic Compounds (VOC) are non-methane organic compounds that react with Nox and sunlight to harm ozone.

N/A = Not Applicable

Source: Landrum & Brown, using the EDMS Version 944

E - Responses to Port of Seattle Letter

E-1. - The City does not object to the statement contained in the Sea-Tac Airport Master Plan Update Draft EIS that aircraft operating at the Sea-Tac contribute less than one percent of the region's carbon monoxide, nitrogen oxide, and volatile organic compounds. Within the entire region (King, Pierce and Snohomish Counties), less than one percent is insignificant. But Tukwila is located adjacent to the aircraft operations taking place at the Sea-Tac Airport. Concentrations of carbon monoxide, nitrogen oxide, and volatile organic compounds are far greater than one percent in the vicinity of the airport and associated with aircraft landings and takeoffs. The City does not agree that automobiles are the primary contributor of CO.

E-2. - The primary purpose of constructing the third runway at the Sea-Tac Airport is to provide for projected increased passenger traffic in terms of aircraft landings/takeoffs. To the extent that increased aircraft operations capacity will generate increased operations, additional emissions of carbon monoxide, nitrogen oxide, and volatile organic compounds will occur. If air traffic is to merely increase equally with or without the construction of the third runway within FAA operational guidelines (as stated in the Airport Master Plan Update Draft EIS), one might question the need for a runway. Information presented in Table IV.9-4 is noted.

E-3. - The statement that the number of air passengers at Sea-Tac Airport amounted to 21 million in 1994 and that the year 2000 forecast for air passengers is 24 million and aircraft operations 379 thousand, is accepted.

E-4. - The statement on page 48 of the Draft EIS should be corrected to read as follows: "While most of the City experiences some noise from this facility, residential neighborhoods outside Tukwila and west of Pacific Highway partially fall within the airport's 65 dBA noise contour for operations." Some parts of Tukwila fall within the 55 dBA noise contour. The US Environmental Protection Agency states that 55 dBA noise level inhibits speech. This is significant since the inhibition of speech, while not a direct health hazard, significantly reduces livability in a neighborhood, and the subsequent housing maintenance investment and public service (police and fire) needs.

E-5. - Comment Noted. However, since the Airport Master Plan Draft EIS is undergoing review at this time, the accuracy of a 3 percent or 6 percent increase in impacted dwelling units within the 65 dBA noise contour is indeterminable at this time.

E-6. - Comment noted.

Seattle City Light

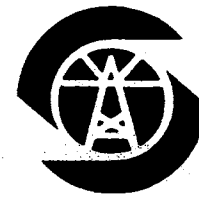
Gary Zarker, Superintendent
Norman B. Rice, Mayor

August 10, 1995

RECEIVED

AUG 14 1995

COMMUNITY
DEVELOPMENT



RECEIVED FAX 8/10/95
xu

Mr. Steve Lancaster
Director, Department of Community Development
City of Tukwila
6300 Southcenter Boulevard
Tukwila, WA 98188

Dear Mr. Lancaster:

Tukwila Comprehensive Plan Draft Environmental Impact Statement (DEIS)

Seattle City Light has reviewed the above-referenced DEIS. Having previously reviewed and commented on the *City of Tukwila Planning Commission Recommended Draft Comprehensive Plan*, SCL's additional comments are as follows:

- On page 81, Community Image/Aesthetics, Proposed Mitigation Measures, the DEIS states "Require streetscape designs, i.e., inclusion of street trees . . . to lessen visual impacts of development." The final EIS should briefly discuss the selection and maintenance of appropriate species for establishment under existing overhead power lines, and potential problems arising between the installation of underground wiring and tree roots. Tim Hohn, our Urban Forester with City Light's Vegetation Management Unit, is available to answer questions that you might have about street trees. He may be contacted at (206)306-1902.

F-1

Thank you for the opportunity to comment on this document. If you have any questions or require further information, please contact Chuck Peterson at (206)233-2170.

Sincerely,

Jan Mulder, Acting Manager
Natural Resources and Environmental Planning
Environment and Safety Division

CP:bh

F - Responses to Seattle City Light Letter

F-1. - The City is open to working with Tim Hohn, Urban Forester with the Seattle City Light's Vegetation Management Unit to discuss selecting appropriate trees and tree plantings within and adjacent to electric utility line right of ways.

August 3, 1995

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AUG 07 1995

COMMUNITY
DEVELOPMENT

Steve Lancaster, Director
Department of Community Development
City of Tukwila
6300 Southcenter Boulevard, Ste. #100
Tukwila, WA 98188

BOEING

Dear Mr. Lancaster:

Per our discussion earlier this week, I believe that the annexation area identified by Tukwila would be a reasonable extension of the existing MIC and would favor this action.


However this action should be considered in concert with the boundary line adjustments requested by the Duwamish Coalition. As you are aware, a problematic issue facing Boeing redevelopment in the Duwamish Corridor has been the bisection of our sites and in some cases even our buildings by jurisdictional boundary lines. As the staffs of the respective jurisdictions develop plans for boundary adjustments I would suggest that this area and the area immediately north of your targeted annexation area be included. The annexation would isolate a small sliver of unincorporated King County along the western bank of the Duwamish Waterway which effectively bisects our Southpark site. This has been the source of enormous confusion in the application of shoreline master plans and codes for this site.

G-1

While we note that nobody wants to annex the County's 16th Avenue Bridge, we believe that there is no difference between the logic of correcting boundary lines along East Marginal Way, and correcting boundary lines along the Duwamish Waterway.

Thank you for the opportunity of commenting on this proposed action and for your time and consideration of this matter.

Sincerely,



Frank Figg, Manager,
Local Government Affairs
Puget Sound

G - Responses to The Boeing Company Letter

G-1. - The City is sympathetic to the problems caused to the Boeing Company associated with irregular and illogical boundary lines as outlined in the letter. The City is open to, and willing to work with adjoining jurisdictions to solve these problems. Specific solutions to these problems must come after the City has completed its work leading to the adoption of the Comprehensive Plan.



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H

AUG 03 1995

COMMUNITY DEVELOPMENT

State of Washington
DEPARTMENT OF FISH AND WILDLIFE

Mailing Address: 600 Capitol Way N • Olympia, WA 98501-1091 • (360) 902-2200, TDD (360) 902-2207
Main Office Location: Natural Resources Building • 1111 Washington Street SE • Olympia, WA

July 28, 1995

TO: Shane Hope
Senior Planner, Growth Management Services

FROM: Stephen Penland
Growth Management Coordinator

SUBJECT: CITY OF TUKWILA DRAFT COMPREHENSIVE PLAN

The Department of Fish and Wildlife (WDFW) appreciates this opportunity to comment on the draft comprehensive plan (dated 4/6/95) prepared by the City of Tukwila pursuant to the Growth Management Act (GMA). Our review has focused on matters related to fish and wildlife resources.

WDFW acknowledges the high value placed on shorelines, sensitive areas, and other natural amenities in the plan's vision statements (p. 9). We also agree that government is often reactive rather than proactive, and that often too little attention is given to preserving our environment (p. 11). One of the goals of WDFW's participation in GMA planning with Tukwila is to help protect fish and wildlife resources for present and future generations, thereby contributing to the realization of this aspect of Tukwila's vision of the future.

Several aspects of the draft comprehensive plan will benefit fish and wildlife resources. Among the most noteworthy of these are the following:

1. An open space network can provide critical habitat to a variety of fish and wildlife species, particularly in an urbanized area. WDFW entirely agrees that a variety of lands can be components of an open space network (p. 15; Policy 1.10.1). The fact that multiple functions are served by such areas should increase their importance to residents of the city.
2. Research has shown that the single most important factor affecting songbird communities in urban areas is the presence of trees. Trees are important to other wildlife species as well. In addition, trees are important to the survival of many fish species in that trees greatly influence water temperature, oxygen content, food abundance, protective cover, rearing habitat, and other aspects of aquatic habitat. Therefore, Tukwila's intention to preserve or restore trees (e.g., Policy 1.4.1, Policy 1.10.13, Policy 4.2.2, Policy 5.1.1, Policy 5.9.2) will contribute to the habitat requirements of these species.

H-1

One source of information and assistance to implement the policies regarding trees is found in a new publication entitled "Community Forestry and Urban Growth - A Toolbox for Incorporating Urban Forestry Elements into Community Plans", written by the Department of Natural Resources. This publication provides background information on the public benefits of urban forestry as well as recommended goal/policy statements appropriate for different elements of a comprehensive plan. The publication may be obtained from the DNR, Resource Protection Division, P.O. Box 47037, Olympia 98504-7037.

WDFW's has only a single serious concern regarding protection for fish and wildlife resources in Tukwila's comprehensive plan. By far the most important fish and wildlife resource in the entire city is the Green/Duwamish River. Like other streams and rivers in Washington State, the Green/Duwamish covers only a very small percentage of Tukwila's land area, but its importance to fish and wildlife is enormous. Wildlife occur more often and in greater variety in riparian habitats like the Green/Duwamish River than in any other habitat type. Approximately 90 percent of Washington's wildlife species prefer or are dependent on riparian habitat. The Green/Duwamish River is of statewide significance and supports chinook salmon, coho salmon, chum salmon, steelhead trout, searun cutthroat trout, and a host of songbirds, amphibians, and small mammals.

The policies in Tukwila's draft comprehensive plan related to development in the vicinity of the Green/Duwamish River do not reflect the outstanding habitat values of this resource. The policies only provide a 50-foot open space corridor on a very short segment of the river in the southern portion of the planning area. The majority of the river is given over to industrial, commercial, and residential development, with no buffer of undeveloped open space along the river's edge.

Overwhelming scientific evidence shows that a minimum buffer of 100' is needed to protect water quality of streams from adjacent urban land uses. Without such a buffer, the beneficial products provided by riparian vegetation will be replaced by deleterious hydrocarbons, heavy metals, and other harmful components of urban development through stormwater runoff and air pollution. Declines and losses of fish and wildlife will follow. Indeed, it is this kind of habitat loss that is primarily responsible for the 89 species that are endangered, threatened, sensitive, or candidates for listing in Washington State.

If Tukwila residents value the fish and wildlife heritage received from generations past, and if they wish in turn to pass on this heritage to their children, grandchildren, and succeeding future generations, then adequate policies to ensure the long-term viability of these species must be an important component of the comprehensive plan. However, as currently written, the policies of Tukwila's draft comprehensive plan regarding the Green/Duwamish River do not adequately support the protection of fish and wildlife resources.

Tukwila's draft comprehensive plan states that fish, wildlife, and the heritage they embody are important. For example, the plan states that "we honor this past and seek to preserve and enhance our community and environment by dreaming, planning, and investing in our future" (p. 7); "we seek to protect our shoreline, sensitive areas, other natural amenities, and our historical landmarks" (p. 9); and "...the Duwamish/Green river offers a unique natural amenity whose potential as a prominent and dramatic element of the community image has yet to be fully recognized" (p. 14).

But there are other land use concerns in Tukwila. Jobs and economic vitality are also important to its citizens. And in this regard, Tukwila has been remarkably successful. Tukwila has nearly *three times* as many jobs as it has residents, and it has almost 11 times the retail business typical for a community of its size and economic strength (p. 32). The same degree of growth and success cannot be said for populations of fish and wildlife in Tukwila.

If the statements regarding protection of sensitive fish and wildlife resources and their shoreline habitat truly mean something, then other actions must be taken. The policies regarding development along the Green/Duwamish River are at the bottom of the list of preferred uses for shoreline uses under the Shoreline Management Act (see pp. 54-55). The policies limiting open space buffers to only a small segment of the river are not consistent with other stated policies (e.g., Policy 5.9.1 - Ensure that shoreline development minimizes impacts on wildlife...; Policy 5.10.1 - Design, locate, and manage shoreline development..in a manner that ..protects water quality). The policy to promote good river stewardship (Policy 5.2.2) is seriously hampered at the outset by fostering commercial/industrial uses along the river without appropriate buffers.

H-2

Tukwila seeks to "balance" protection of habitat areas with economic development (Policy 4.2.4). But the policies established by the draft comprehensive plan do not provide balance in that many fish and wildlife resources dependent on the Green/Duwamish River will be threatened with local extinction. Fish species passing through the Green/Duwamish to other parts of the river basin will also be adversely affected by inadequate protection of this downstream portion of their riparian habitat. These species do not require, and WDFW does not advocate, a 50:50 allocation of land use to achieve "balance". Instead, we contend that different landforms embody intrinsic opportunities as well as constraints for urban development, and development should respond to the operation of these natural processes. If 5%-10% of the landscape is critically important to 90% of the fish and wildlife species, then these fragments of the original landscape should be devoted primarily to the conservation of habitat. Land uses that are not dependent on access to water should not be placed on land that is vital to riparian-dependent species.

H-2

With all of its stated intentions to protect sensitive areas, the City of Tukwila must know that our bottom-line message is that these policies will not adequately protect and enhance natural resources along the Green/Duwamish, but instead will contribute to their continuing decline and eventual loss.

The City of Tukwila should instead adopt policies that will result in undeveloped areas with trees and vegetation extending from the river's edge out to a minimum of 100', and this should be applied to all remaining undeveloped parcels within the planning area. This protection of riparian habitat could be accomplished through a variety of mechanisms already outlined in the plan, including regulatory buffers, design standards, land purchases, incentives, and voluntary conservation programs.

WDFW believes the City of Tukwila's draft comprehensive plan will be more complete by addressing the following secondary concerns:

- The plan builds upon Tukwila's 1991 Sensitive Areas Ordinance which addresses the City's concern with environmental quality (p. 45). However, WDFW was not included in the review of this ordinance. As an agency with recognized expertise in management of fish and wildlife resources, we respectfully request the opportunity to provide comments on the ordinance. This might best occur when the City reviews its ordinances for consistency with the adopted comprehensive plan.
- The implementation strategy to protect fish and wildlife habitat (Goal 4.2) is limited to sensitive area regulations. However, other strategies already discussed in the plan also help protect fish and wildlife habitat, and these should be included as implementation strategies. They include an urban forestry program, tree ordinance, land altering regulations, and stormwater regulations.
- Goal 4.4 and Policy 4.4.1 deal with environmental education programs and activities for the public. The best opportunity for habitat enhancement in established neighborhoods may be the voluntary actions taken by homeowners and neighborhood associations. These activities may include planting of native trees and shrubs on individual properties, vegetation enhancement in neighborhood parks, nestbox trails, reduced and more informed use of insecticides and fertilizers, effective winter feeding of songbirds, and other similar activities. WDFW has established a Backyard Wildlife Sanctuary program to provide information and incentives to homeowners who want to help wildlife in their neighborhood. We encourage the City of Tukwila to include this program in its own informational and educational activities dealing with voluntary cooperation in protecting wildlife values on private property. For further information, contact Patricia Thompson, WDFW Urban Biologist, at 775-1311 x 111.

H-3

When the City of Tukwila revisits its critical areas regulations, WDFW strongly recommends that the City examine the extent to which WDFW's Priority Habitats and Species (PHS) program has been incorporated into the regulations. We believe that the PHS program represents the most complete statewide inventory of important fish and wildlife resources that need to be addressed by local jurisdictions to protect and perpetuate these resources for present and future generations.

H-3

The decisions made by local jurisdictions pursuant to the Growth Management Act will significantly affect important fish and wildlife resources, thereby strongly influencing WDFW's mandate to preserve, protect, and perpetuate Washington's rich fish and wildlife heritage. For this reason, we look forward to a continuing cooperative working relationship with Tukwila as it continues with its GMA planning.

For further assistance regarding fish and wildlife resources in or near the City of Tukwila, planners should contact Phil Schneider, WDFW Habitat Biologist, at (206)775-1311 x 107. Please contact me at (360)902-2598 if you or Tukwila planners have any questions regarding these comments.

cc: Ted Muller, WDFW
Greg Hueckel, WDFW
Steve Keller, WDFW
Phil Schneider, WDFW
Patricia Thompson, WDFW
✓ Steve Lancaster, City of Tukwila

H - Responses to Washington State Department of Fish and Wildlife Letter

H-1. - Thank you for the comments. Comments noted.

H-2. - Policy 4.2.4 has been modified to: "Protect and manage Tukwila's priority habitat areas, and habitat corridors within and between jurisdictions." The "balancing" language has been struck.

Additional policies on habitat protection/management are found in the Shoreline section under Goals 5.9 and 5.10. These policies address protection, restoration, and in unavoidable situations, the mitigation replacement of lost important habitat.

Comprehensive Plan policies have been revised again for effectiveness in protecting the natural resources along the Green/Duwamish River in this existing, urbanized environment. The City concludes that the policies are sufficient to guide development for habitat protection in this "Urban" designated area.

The commentator's proposed 100 foot wide, undeveloped buffer area along the Green/Duwamish river is not appropriate in "Urban" designated shoreline areas. Alternative methods to protect and enhance the river will be assessed during the finalization of Tukwila's Shoreline Master Program and in developing "river design guidelines" envisioned in the Plan.

Incremental reductions in river habitat characteristics have been largely due to flood control structures. All such development has been approved in coordination with the Washington State Department of Fish and Wildlife.

H-3. - The WDFW will be consulted in future implementation programs for incorporation of these and other actions.

The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that every entry should be supported by a valid receipt or invoice. This not only helps in tracking expenses but also ensures compliance with tax regulations. The second part of the document provides a detailed breakdown of the company's revenue for the quarter. It shows that sales have increased by 15% compared to the previous quarter, primarily due to the launch of a new product line. The third part of the document outlines the budget for the next quarter, highlighting areas where cost-cutting measures can be implemented without compromising the quality of the products. Finally, the document concludes with a summary of the overall financial performance and a forecast for the coming year.

The following table shows the monthly sales figures for the first quarter of the year. The data indicates a steady increase in sales over the three-month period, with a significant spike in the final month. This growth is attributed to the successful marketing campaign and the positive reception of the new product line. The table also includes a comparison of sales figures against the target set for each month, showing that the company has consistently exceeded its goals.

In addition to the sales data, the document also provides a detailed analysis of the company's operating expenses. It shows that while sales have increased, the cost of goods sold has also risen, which has led to a slight decrease in profit margins. However, the company has managed to control its overhead costs, which has helped to offset the increase in the cost of goods sold. The document also discusses the company's investment in research and development, which is expected to lead to the launch of several new products in the coming year. Finally, the document provides a summary of the company's financial position at the end of the quarter, showing that the company remains in a strong financial position and is well-positioned to continue its growth.

