Doug McIntyre

From: Tim Trohimovich <Tim@futurewise.org>
Sent: Friday, July 24, 2020 4:40 PM
To: EIS
Subject: Comments on the Scope of the LOS and Capital Facilities EIS
Attachments: Futurewise Coms on Scope of Sammamish Concurrency & Capital Facilities Plan EIS July 24 2020 Final.pdf

[CAUTION - EXTERNAL EMAIL]

Dear Madams and Sirs:

Enclosed please find Futurewise's comments on the scope of the EIS for the amendments to the Comprehensive Plan and Municipal Code intended to address transportation level of service standards and capital facilities needs, City of Sammamish Agency File No. POL2020-00331.

Thank you for considering our comments.

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July 24, 2020

Transportation Level of Service & Capital Facilities
Environmental Impact Statement (EIS)
City of Sammamish
801 228th Ave SE
Sammamish, WA 98075
ATTN: EIS Scoping Comment

Dear Sirs and Madams:

Subject: Comments on the scope of the EIS for the amendments to the Comprehensive Plan and Municipal Code intended to address transportation level of service standards and capital facilities needs, Agency File No. POL2020-00331.
Send via email to: eis@sammamish.us

Thank you for the opportunity to comment on the scope of the EIS for the amendments to the Comprehensive Plan and Municipal Code intended to address transportation level of service standards and capital facilities needs. Futurewise agrees with the city's determination of significance and appreciates the opportunity to comment on the scope of the environmental impact statement (EIS).

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. Futurewise has members and supporters throughout Washington State including the City of Sammamish.

Futurewise agrees with the scoping notice that EIS should analyze impacts on water resources including water quality and stormwater. We also recommend that the EIS also address water quantity.[1] There is a direct connection between how we grow and water quality, storm water, and water quantity. As an article in the Journal of the American Water Resources Association concluded "[t]otal runoff volume and *per acre* loadings of total phosphorous, total nitrogen, and total suspended solids increased with density as expected, but *per capita* loadings and runoff decreased markedly with density. For a constant or given population, then, higher density can result in dramatically lower total loadings than more diffuse suburban densities."[2] Large lots and low densities increase water demand,

[1] Surface and ground water quantities are elements of the environment. WAC 197-11-444(1)(c)(i) & (iv).
[2] John S. Jacob and Ricardo Lopez, *Is Denser Greener? An Evaluation of Higher Density Development as an Urban Stormwater-Quality Best Management Practice* 45 JOURNAL OF THE AMERICAN WATER RESOURCES ASSOCIATION (JAWRA) pp. 687-701, p. 687 (2009: DOI: 10.1111/j.1752-1688.2009.00316.x) accessed on July 22, 2020 at: https://onlinelibrary.wiley.com/doi/pdf/10.1111/j.1752-1688.2009.00316.x.

increase leakage from water systems, and increase costs to water system customers.[3] So accommodating the same population at higher densities can reduce future water demands and costs.[4] Choices about concurrency systems and capital facilities can either facilitate land use patterns that reduce adverse impacts on water quality, water quantity, and stormwater runoff or those choices can increase the adverse impacts. The EIS needs to examine these impacts.

Futurewise also agrees with the scoping notice that EIS should analyze impacts on plants and animals including fish. We also recommend that impacts on larger aquatic systems and other species such as the Southern Resident orcas also be analyzed. While diminished over their historical numbers, Chinook salmon use the Sammamish River system including Lake Sammamish and Issaquah Creek.[5] The Chinook salmon is the primary food source of the Southern Resident orcas.[6] To protect the Chinook salmon and help recover the Southern Resident orcas, the Southern Resident Orca Task Force recommends increasing affordable housing and reducing urban sprawl by growing "up instead of out."[7] The EIS should analyze the effects of the proposed amendments on the City of Sammamish's ability to grow up and to otherwise protect the Chinook and Southern Resident orcas.

Futurewise also agrees with the scoping notice that EIS should analyze impacts on land use including plans and policies. The EIS should also analyze the impacts on housing, which is also an element of the environment,[8] and affordable housing. So the EIS should analyze the impacts of the amendments on land use plans and the City's capacities and plans to provide housing including the planned variety of housing densities, the City's share of countywide needs in the moderate-, low-, and very-low income housing categories, and the City's capacity to make adequate provisions for existing and projected needs of all economic segments of the community.

Futurewise also agrees with the scoping notice that EIS should analyze impacts on the transportation system including walking, bicycling, and transit. The EIS should consider whether the amendments will induce demand and the impacts of that induced demand on the environment. The EIS should also consider whether the amendments include the level of service standards for transit routes required by RCW 36.70A.070(60(a)(iii)(B) and whether the amendments will aid achieving the level of service standards, the impact of the amendments on transit service, and whether the amendments will support densities sufficient to efficiently provide transit throughout the city.

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[3] United States Environmental Protection Agency, *Growing Toward More Efficient Water Use: Linking Development, Infrastructure, and Drinking Water Policies* pp. 3 – 5 (EPA 230-R-06-001: January 2006) last accessed on July 22, 2020 at: https://www.epa.gov/smartgrowth/growing-toward-more-efficient-water-use.
[4] *Id.* at p. 8.
[5] Hans B. Berge, Mistie L. Hammer, Steve R. Foley, *Timing, abundance, and population characteristics of spawning Chinook salmon in the Cedar/Sammamish Watershed* pp. 11 – 12 (King County Department of Natural Resources and Parks and Washington Department of Fish and Wildlife Region 4: July 2006) last accessed on July 22, 2020 at: https://your.kingcounty.gov/dnrp/library/2006/kcr1960.pdf.
[6] Southern Resident Orca Task Force, *Final Report and Recommendations* p. 6 (Nov. 2019)last accessed on July 22, 2020 at: https://www.governor.wa.gov/issues/issues/energy-environment/southern-resident-orca-recovery/task-force.
[7] *Id.* at p. 107.
[8] WAC 197-11-444(2)(b)(ii).

Climate is also an element of the environment.[9] Washington State enacted limits on greenhouse gas emissions and a statewide goal to reduce annual per capita vehicle miles traveled for light-duty vehicles. Comprehensive planning is one way to reduce greenhouse gas pollution and vehicle miles traveled. Almost half of all greenhouse gas emissions in our state result from the transportation sector.[10] Land use and transportation strategies that promote increased densities sufficient to support transit, compact and mixed-use development, and infill development reduce the need to drive and greenhouse gas emissions from transportation.[11]

In addition, buildings are a major source of greenhouse gas emissions in Washington State.[12] A recent peer-reviewed study of housing in the United States, including Washington State, found that increasing population density is associated with decreased greenhouse gas emissions per square meter of dwelling space and decreased per capita greenhouse gas emissions from housing.[13] Land use strategies that promote increased densities, compact development, and infill development can reduce greenhouse gas emissions from housing.[14] The EIS should analyze the impacts of the amendments on the City's ability to facilitate higher density and mixed-use development and the City's land use plans that call for these types of development.

This analysis is especially important because Washington is not on track to meet the 2020 greenhouse gas reduction requirement of 90.0 million metric tons (MMT).[15] The 2017 emissions

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[9] WAC 197-11-444(1)(b)(iii).
[10] Evan Bush, *Washington's greenhouse-gas emissions continue to trend higher in latest inventory* Seattle Times p. *5 (Nov. 19, 2019) last accessed on July 22, 2020 at: https://www.seattletimes.com/seattle-news/environment/washingtons-greenhouse-gas-emissions-continue-to-trend-higher-in-latest-inventory/.
[11] Benjamin Goldsteina, Dimitrios Gounaridisa, and Joshua P. Newella *The carbon footprint of household energy use in the United States* PNAS LATEST ARTICLES p. 7 of 9 (PNAS first published July 20, 2020 https://doi.org/10.1073/pnas.1922205117) accessed on July 23, 2020 at: https://www.pnas.org/content/early/2020/07/14/1922205117; National Research Council, *Driving and the Built Environment: The Effects of Compact Development on Motorized Travel, Energy Use, and CO_2 Emissions -- Special Report 298* pp. 3 – 8 (Washington, DC: The National Academies Press, 2009) last accessed on July 23, 2020 at: https://www.nap.edu/download/12747. *Special Report 298* was peer reviewed. *Id.* p. *3. PNAS articles are peer-reviewed. PNAS Author Center Editorial and Journal Policies last accessed on July 23, 2020 at: https://www.pnas.org/authors/editorial-and-journal-policies.
[12] Evan Bush, *Washington's greenhouse-gas emissions continue to trend higher in latest inventory* Seattle Times pp. *3 – 5 (Nov. 19, 2019).
[13] Benjamin Goldsteina, Dimitrios Gounaridisa, and Joshua P. Newella *The carbon footprint of household energy use in the United States* PNAS LATEST ARTICLES pp. 3 – 5 of 9 (PNAS first published July 20, 2020 https://doi.org/10.1073/pnas.1922205117)
[14] Benjamin Goldsteina, Dimitrios Gounaridisa, and Joshua P. Newella *The carbon footprint of household energy use in the United States* PNAS LATEST ARTICLES p. 7 of 9 (PNAS first published July 20, 2020 https://doi.org/10.1073/pnas.1922205117); National Research Council, *Driving and the Built Environment: The Effects of Compact Development on Motorized Travel, Energy Use, and CO_2 Emissions -- Special Report 298* pp. 3 – 8 (Washington, DC: The National Academies Press, 2009) last accessed on July 23, 2020 at: https://www.nap.edu/download/12747. *Special Report 298* was peer reviewed. *Id.* p. *3.
[15] State of Washington Department of Ecology, *Washington State Greenhouse Gas Emissions Inventory: 1990-2015: Report to the Legislature* p. vii & p. 1 (Publication 18-02-043: Dec. 2018) last accessed on July 23, 2020 at: https://fortress.wa.gov/ecy/publications/documents/1802043.pdf; Evan Bush, *Washington's greenhouse-gas emissions continue to trend higher in latest inventory* Seattle Times (Nov. 19, 2019.

were 97.5 MMT.[16] Trips generated by residents of the City of Sammamish will increase global warming and its adverse impacts on the City and its residents and property owners such as flooding.[17] Recent scientific reports document that "the required cuts in emissions are now 2.7 per cent per year from 2020 for the 2°C [temperature increase] goal and 7.6 per cent per year on average for the 1.5°C goal."[18] "Further delaying the reductions needed to meet the goals would imply future emission reductions and removal of CO_2 from the atmosphere at such a magnitude that it would result in a serious deviation from current available pathways. This, together with necessary adaptation actions, risks seriously damaging the global economy and undermining food security and biodiversity."[19]

SEPA EISs are required to analyze greenhouse gas pollution. As the Shorelines Hearings Board concluded, "because it failed to fully analyze the impacts of greenhouse gas emissions from the Project and to consider whether additional mitigation is required, the Final EIS is remanded to Cowlitz County and the Port for further SEPA analysis consistent with this opinion."[20]

Thank you for considering our comments. If you require additional information or cannot download any of the documents we reference, please contact me at telephone 206-343-0681 Ext. 102 or email: tim@futurewise.org.

Very Truly Yours,

Tim Trohimovich, AICP
Director of Planning and Law

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[16] State of Washington Department of Ecology, *2017 greenhouse gas data* webpage accessed on July 23, 2020 at: https://ecology.wa.gov/Air-Climate/Climate-change/Greenhouse-gases/2017-greenhouse-gas-data."
[17] State of Washington Department of Ecology, *Climate change and the environment* webpage last accessed on July 23, 2020 at: https://ecology.wa.gov/Air-Climate/Climate-change/Climate-change-the-environment.
[18] United Nations Environment Programme, *Emissions Gap Report 2019* p. xx (UNEP, Nairobi: 2019) last accessed on July 23, 2020 at: http://www.unenvironment.org/emissionsgap.
[19] *Id.*
[20] *Columbia Riverkeeper, Sierra Club, and Center For Biological Diversity v. Cowlitz County, Port of Kalama, Northwest Innovation Works-Kalama, LLC, and State of Washington, Department of Ecology*, Shorelines Hearings Board (SHB) No. 17-010c, Order on Motions for Partial Summary Judgment (Sept. 15, 2017), at 18, 2017 WL 10573749, at *9.