

DETERMINATION OF NONSIGNIFICANCE (“DNS”)

Description of Proposal: Promulgation of administrative rules pertaining to encampments, comprised of two elements (collectively, the “Proposal”): (a) repealing and replacing the City of Seattle’s 2008 Multi-Departmental Rules No. MDAR 08-01 (regarding operating hours for City properties; unauthorized camping on City properties; enforcement procedures; and removal of unauthorized property) with MDAR 17-01; and (b) adoption of the new, Department of Finance and Administrative Services’ encampment rule FAS 17-01.

Proponent: City of Seattle/Department of Finance and Administrative Services

Location of Proposal: The Proposal pertains only to property that is: (a) under the jurisdiction of the City of Seattle; and (b) within the Seattle City limits.

Lead Agency: City of Seattle/Department of Finance and Administrative Services (“FAS”)

FAS has determined that the Proposal does not have a probable, significant adverse impact on the environment. An environmental impact statement is not required under RCW 43.21C.030 (2)(c). This decision was made after a review of a completed environmental checklist and other information on file with FAS. Paper copies of the checklist are available at the Customer Service Bureau (Seattle City Hall, 601 Fifth Avenue, First Floor, Seattle) from 8:00 a.m.-5:00 p.m. Monday through Friday. Electronic copies are available at <http://www.seattle.gov/finance-and-administrative-services/directors-rules>

There is no comment period for this DNS.

Responsible official: Fred Podesta
Director, Department of Finance and Administrative Services
700 Fifth Avenue, Suite 5200
P.O. Box 94689
Seattle, WA 98124-4689
Email and telephone contact information (both care of Frances Samaniego):
Frances.Samaniego@seattle.gov
206-684-0525

/s/: Fred Podesta
Director, Department of Finance and Administrative Services

Issue date: January 31, 2017

You may appeal this determination to:

City of Seattle Office of Hearing Examiner
700 Fifth Avenue, Suite 4000
P.O. Box 94729
Seattle, WA 98124-4729

An appeal must be filed by no later than February 15, 2017.

You should be prepared to make specific, factual objections.

Visit the Hearing Examiner’s website at <http://www.seattle.gov/examiner/> for information on how to file an appeal electronically, and for the *Hearing Examiner Rules of Practice and Procedure*.

Date of publication in the Seattle Daily Journal of Commerce: January 31, 2017.

SEPA ENVIRONMENTAL CHECKLIST

Purpose of checklist:

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Instructions for Lead Agencies:

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

Use of checklist for nonproject proposals:

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B plus the [SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS \(part D\)](#). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for nonprojects) questions in Part B - Environmental Elements –that do not contribute meaningfully to the analysis of the proposal.

A. Background

1. Name of proposed project, if applicable:

City of Seattle's Administrative Rules Pertaining to Removing Encampments

2. Name of applicant:

The City of Seattle/Department of Finance and Administrative Services (the “Applicant”).

3. Address and phone number of applicant and contact person:

Physical address: 700 Fifth Avenue, Suite 5200, Seattle, WA 98104
Mailing address: P.O. Box 94689, Seattle, WA 98124
Contact person: Frances Samaniego, 206-684-8391
Email address: Frances.Samaniego@Seattle.gov

4. Date checklist prepared:

January 25, 2017.

5. Agency requesting checklist:

City of Seattle/Department of Finance and Administrative Services.

6. Proposed timing or schedule (including phasing, if applicable):

The rules to manage encampments will be adopted in early 2017.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

No. The City is engaged in a variety of activities other than, and in addition to the Proposal, which it expects will over time reduce the number of encampments. Therefore, the City expects that over time the Proposal will apply to fewer encampments.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

None.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

No.

10. List any government approvals or permits that will be needed for your proposal, if known.

None.

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

This proposal includes three elements, collectively the “Proposal”:

- Repealing the City of Seattle’s 2008 Multi-Departmental Administrative Rule No. MDAR 08-01 (regarding operating hours for City properties; unauthorized camping on City properties; enforcement procedures; and removal of unauthorized property) (“MDAR 08-01”);
- Adopting the City of Seattle’s Multi-Departmental Administrative Rule No. MDAR 17-01; and
- Adopting the new FAS Encampment Rule, (“FAS Rule 17-01”).

Among other things, MDAR 17-01, includes a new definition of an encampment, and a provision that an encampment removal must be carried out in compliance with FAS Rule 17-01.

The Proposal pertains only to property that is: (a) under the jurisdiction of the City of Seattle; and (b) within the Seattle City limits.

FAS Rule 17-01 addresses the City-wide protocols for removing encampments. Certain notices must be posted in an encampment and timelines followed before an encampment may be removed. In addition, FAS Rule 17-01 provides that the City must identify available housing, other shelter, or encampment locations to encampment occupants. Outreach personnel must be present at the commencement of removal activities, and may leave an encampment only after outreach services have been refused by all people at the encampment site. The proposed rules provide that property meeting the definition of “personal property” collected during the course of an encampment removal must be stored and available for retrieval by or delivery by the City to its owner.

Overall, this protocol will likely slow the process by which encampments are removed and may lead to an increased number of encampments throughout the City at any point in time. In particular, the provision requiring the City to identify alternative shelter may delay the removal of some encampments. At the same time, the provision permitting the prompt removal of those encampments which constitute either an obstruction or an immediate hazard will accelerate the removal of such encampments.

Proposal’s Purpose

One purpose of the Proposal is to strike a balance among a series of stakeholders, each having an interest in the issue of homeless encampments. Stakeholders include: the owners and residents of property within the City limits, the estimated 3,000 homeless who currently call “home” one of the numerous existing encampments on City-owned property, and those responsible for enforcing the Proposal.

The City has limited resources for removing encampments. Current removal rules do not prioritize encampment removal so as to minimize a removal's impact on the homeless, the community, and the environment. Also, encampment removal is disruptive to homeless individuals, and the City is concerned that homeless individuals are not aware of shelter alternatives.

The Proposal addresses these issues in several ways. From the standpoint of owners and residents of property within the City limits, the Proposal — specifically FAS Rule 17-01, is beneficial in several respects. It offers a new designation — the emphasis area — for City-owned properties where future encampments of any kind are prohibited. FAS Rule 17-01 also retains authority to immediately remove encampments considered to be an immediate hazard or an obstruction. Finally, FAS Rule 17-01 leaves undisturbed all the rights and remedies a private property owner has to remove encampments on their property.

From the perspective of encampment occupants — the homeless, FAS Rule 17-01 offers several important improvements over MDAR 08-01. First, by establishing a clear protocol across departments for the removing encampments on City-owned property, it makes the removal process more predictable. Second, FAS Rule 17-01 features robust procedures for giving notice of an encampment removal. Third, to better address the underlying cause of homelessness, FAS Rule 17-01 requires that outreach services be made available to anyone facing displacement by an encampment removal. Fourth, in part to reduce the likelihood of “encampment occupant recidivism,” FAS Rule 17-01 will require that the City identify or offer alternative accommodations to encampment occupants before it removes an encampment. FAS Rule 17-01 also establishes important safeguards to protect against the loss of personal property collected during the encampment-removal process.

From the standpoint of those within the City who are responsible for enforcing FAS Rule 17-01, the new rule offers several important, new tools. First, it provides an up-to-date road map for dealing with encampments. Second, it provides sufficient authority to remove encampments that are an immediate hazard or an obstruction. Third, to prevent encampments in those areas of chronic or persistent encampment removal, the City may designate the areas as “emphasis areas.” While this designation requires the City to patrol and fence the areas, future encampments within a designated emphasis area will be considered an obstruction and the encampment may be removed immediately. As such, the removal will not be subject to the outreach and alternative shelter provisions required in the case of most other encampment removals. Finally, by harmonizing the encampment-removal process across different departments, FAS Rule 17-01 reduces the likelihood that a given encampment removal will be done in a different manner.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.

Encampments that are subject to these rules occur throughout the City.

B. ENVIRONMENTAL ELEMENTS

Note: As the Proposal constitutes a nonproject action, it will have no impact on many of the environmental elements listed below. In such instances, the related question is considered to have no meaningful impact on the analysis. Such questions have been marked “no impact,” “not applicable,” or “none.”

1. Earth

a. General description of the site:

(circle one): Flat, rolling, hilly, steep slopes, mountainous, other _____

The Applicant expects that certain provisions within FAS Rule 17-01, most notably the provision that authorizes the City to immediately remove encampments deemed to pose a risk of injury or death, will enable the City to expeditiously remove those encampments on sites that include steep slopes.

b. What is the steepest slope on the site (approximate percent slope)?

Not applicable

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

The Applicant expects that encampments will be erected on a variety of different types of soils.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe.

Although the Proposal is a nonproject action and is not site-specific, encampments that are located in environmentally-critical areas may lead to unstable soils.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate source of fill.

Not applicable.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe.

The establishment of an encampment may lead to erosion on and around the encampment site.

- g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

The Applicant expects that establishing an encampment will generate little, if any, additional impervious surfaces (as such impervious surfaces are defined in Seattle Municipal Code section 22.801.100 - "I"). The Applicant expects that run-off from tents and tarps will be absorbed by pervious surfaces adjacent to tents and tarps.

- h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

In the course of its property management activities, the Applicant will address on a case-by-case basis any material erosion or other material impacts to the earth attributable to an encampment. For example, in the case of material erosion, the City would consult with appropriate experts to develop and implement site-specific control measures. The Proposal will not result in a significant adverse impact to earth as an element of the environment.

2. Air

- a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

Although the Proposal is a nonproject action and is not site-specific, encampments are expected to generate few, if any, emissions.

- b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

Not applicable.

- c. Proposed measures to reduce or control emissions or other impacts to air, if any:

None. The Proposal will not result in a significant adverse impact to air as an element of the environment.

3. Water

- a. Surface Water:

- 1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into.

Although the Proposal is a nonproject action and is not site-specific, an encampment may be established in the immediate vicinity of a surface water body. Waste generated by an encampment may have a negative impact on the quality of nearby waters but the impact is not expected to be a significant adverse impact.

- 2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans.

Although the Proposal is a nonproject action and is not site-specific, while it is possible that an encampment may be established within 200 feet of a surface water body, based on past experience in addressing encampment locations, the Applicant considers it unlikely.

- 3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material.

Not applicable.

- 4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known.

Not applicable.

- 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.

Proposal is a nonproject action and is not site-specific. Furthermore, as flood control structures have been built within each of the three areas in the City that are located within a 100-year floodplain, it is unlikely that a 100-year flood would directly impact any encampment or an encampment impact a 100-year floodplain.

- 6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

Although the Proposal is a nonproject action and is not site-specific, an encampment might lead to the discharge of waste or trash into surface waters.

b. Ground Water:

- 1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.

No.

- 2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.

None.

c. Water runoff (including stormwater):

- 1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

Not applicable.

- 2) Could waste materials enter ground or surface waters? If so, generally describe.

Although the Proposal is a nonproject action and is not site-specific, an encampment might lead to the discharge of waste or trash into surface waters.

- 3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.

No impact

d. Proposed measures to reduce or control surface, ground, and runoff water, and drainage pattern impacts, if any:

Hazards to humans or the environment posed by an encampment are a consideration in prioritizing encampment removals. Any encampment generating significant waste would be high-priority for removal under the Proposal. The Proposal will not result in a significant adverse impact to water as an element of the environment.

4. Plants

a. Check the types of vegetation found on the site:

- deciduous tree: alder, maple, aspen, other
- evergreen tree: fir, cedar, pine, other
- shrubs
- grass
- pasture
- crop or grain
- Orchards, vineyards or other permanent crops.
- wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
- water plants: water lily, eelgrass, milfoil, other
- other types of vegetation

b. What kind and amount of vegetation will be removed or altered?

Although the Proposal is a nonproject action and is not site-specific, the Applicant anticipates that the establishment of encampments could lead to the removal of a small number shrubs, and to the degradation of grasses. Although some shrubs could be removed or grasses degraded, the Proposal will not result in a significant adverse impact to plants as an element of the environment.

- c. List threatened and endangered species known to be on or near the site.

Encampments are located in urbanized areas and it is unlikely that there will be threatened or endangered plant species on or near an encampment.

- c. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

None.

- d. List all noxious weeds and invasive species known to be on or near the site.

Not applicable.

5. **Animals**

- a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site.

Examples include:

birds: hawk, heron, eagle, songbirds, other:

mammals: deer, bear, elk, beaver, other:

fish: bass, salmon, trout, herring, shellfish, other _____

A variety of urban species including birds, raccoons, or other small mammals may exist near an encampment site.

- b. List any threatened and endangered species known to be on or near the site.

It is unlikely that any threatened or endangered species will be located at an encampment that largely occur in urbanized settings.

- c. Is the site part of a migration route? If so, explain.

Encampments largely occur in urbanized settings that are not used by migratory wildlife.

- d. Proposed measures to preserve or enhance wildlife, if any:

None. The Proposal will not result in a significant adverse impact to animals as an element of the environment.

- e. List any invasive animal species known to be on or near the site.

Not applicable.

6. Energy and Natural Resources

- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

Energy use associated with encampments and their removal is minimal.

- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

No.

- c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

None. The Proposal will not result in a significant adverse impact to energy or natural resources as an element of the environment.

7. Environmental Health

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste that could occur as a result of this proposal? If so, describe.

Dumping trash, lack of sanitary sewerage systems for collecting and treating human waste, and the improper disposal of drug paraphernalia (specifically, hypodermic needles) are health hazards associated with encampments and their removal.

- 1) Describe any known or possible contamination at the site from present or past uses.

None known.

- 2) Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.

None.

- 3) Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.

Not applicable.

- 4) Describe special emergency services that might be required.

Services for medical emergencies in the event of an accident or health condition of an encampment occupant.

- 5) Proposed measures to reduce or control environmental health hazards, if any:

The City contracts for trash, water and sanitation services at certain encampments. The City also distributes “sharps” containers at authorized and unauthorized encampments in order to control and safely collect sharps. Furthermore, the provision within FAS Rule 17-01 where the City may immediately remove encampments deemed to present an immediate hazard (whether it be by increased exposure to the elements or an increased risk of injury or death associated with other encampment conditions) will mitigate environmental health hazards of encampments. The Proposal will not result in a significant adverse impact to environmental health as an element of the environment.

b. Noise

- 1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

Encampments located near highways or heavily-used streets will be subject to vehicular noise.

- 2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

Although the Proposal is a nonproject action and is not site-specific, encampments themselves could lead to additional noise from the use of radios.

- 3) Proposed measures to reduce or control noise impacts, if any:

Noise from an encampment is subject to the provisions of SMC Chapter 25.08, Noise Control. The Proposal will not result in a significant adverse impact to noise as an element of the environment.

8. Land and Shoreline Use

- a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.

Although the Proposal is a nonproject action and is not site-specific, the Proposal may lead to additional encampments. While an encampment may impact an adjacent property, it would not materially change the use or land-use capacity of an adjacent property.

- b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?

Not applicable.

- 1) Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how:

No.

- c. Describe any structures on the site.

Although the Proposal is a nonproject action and is not site-specific, any encampments allowed under the Proposal would likely include tents and other similar structures.

- d. Will any structures be demolished? If so, what?

Under the Proposal, "demolition" would be limited to removing tents and other similar structures in the context of an encampment removal. The removal must comply with the encampment removal provisions in FAS Rule 17-01, including those provisions pertaining to the posting of notices, providing of outreach services, and the identification of alternative shelter.

- e. What is the current zoning classification of the site?

While the Proposal is a nonproject action and is not site-specific, the Applicant anticipates that encampments will occur on land representing every zoning classification in the City, including residential, commercial, and industrial.

- f. What is the current comprehensive plan designation of the site?

While the Proposal is a nonproject action and is not site-specific, the Applicant anticipates that encampments will occur on land representing every comprehensive-plan designation in the City.

g. If applicable, what is the current shoreline master program designation of the site?

Not applicable.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

While the Proposal is a nonproject action and is not site-specific, the Applicant anticipates that some encampments will occur on land designated as a critical area.

i. Approximately how many people would reside or work in the completed project?

The Applicant anticipates that any encampments, which materialize as a result of the Proposal's enactment, might be one or more tents.

j. Approximately how many people would the completed project displace?

The Applicant estimates that encampment removals will result in "the displacement" of 1,000 individuals each year. Under the Proposal, all displaced individuals will be offered alternative shelter.

k. Proposed measures to avoid or reduce displacement impacts, if any:

Under the Proposal, all displaced individuals will be offered alternative shelter.

l. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

To mitigate impacts from encampment that are more egregious in their nature, FAS Rule 17-01 authorizes the immediate removal of encampments that block the normal use of a City facility or right-of-way, or that are deemed to constitute an immediate hazard. For example, an encampment that can only be accessed by crossing a ramp to a limited-access highway would constitute an immediate hazard.

m. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:

None. The Proposal will not result in a significant adverse impact to land and shoreline use as an element of the environment.

9. Housing

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

While the Proposal will not in and of itself produce additional housing units, certain FAS Rule 17-01 provisions are designed to mitigate the impacts of an encampment removal. More specifically, the notice provisions within FAS Rule 17-01 will provide encampment occupants with notice of the encampment's removal. The outreach services that will accompany most encampment removals are intended to provide encampment occupants with access to as many social services as possible. Finally, the alternative shelter provisions in FAS Rule 17-01 are expected to provide encampment occupants with a pathway to options for at least comparable and preferably superior shelter.

- b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

No impact.

- c. Proposed measures to reduce or control housing impacts, if any:

None. The Proposal will not result in a significant adverse impact to housing as an element of the environment.

10. Aesthetics

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed?

While the Proposal is a nonproject action and will not entail constructing any permanent(?) structures, the Applicant anticipates that no structures (i.e., tents, lean-to sheds, pole structures) in such encampments will extend beyond eight feet.

- b. What views in the immediate vicinity would be altered or obstructed?

No impact.

- c. Proposed measures to reduce or control aesthetic impacts, if any:

Possible measures to control the aesthetic impact of encampments include immediately removing encampments that constitute an immediate hazard or an obstruction (as the terms are defined in FAS Rule 17-01), as well as regular trash collection at some encampments. The Proposal will not result in a significant adverse impact to aesthetics as an element of the environment.

11. Light and Glare

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

Some individuals in an encampment will have flashlights.

- b. Could light or glare from the finished project be a safety hazard or interfere with views?

No.

- c. What existing off-site sources of light or glare may affect your proposal?

Some off-site light sources may affect the encampments, depending on where they are located, but the impacts are expected to be minimal..

- d. Proposed measures to reduce or control light and glare impacts, if any:

None. The Proposal will not result in a significant adverse impact to light and glare as an element of the environment.

12. Recreation

- a. What designated and informal recreational opportunities are in the immediate vicinity?

As the City generally has little control as to where an encampment is initially sited, it is possible that encampments may develop in the immediate vicinity of designated and informal recreational opportunities.

- b. Would the proposed project displace any existing recreational uses? If so, describe.

As the City generally has little or no control as to where an encampment is initially sited, it is possible that encampments may develop in a park and in doing so displace existing, recreational users.

- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

If an encampment in a City park is a hazard or obstruction as defined in FAS Rule 17-01, it is subject to immediate removal. The Proposal will not result in a significant adverse impact to recreation as an element of the environment.

13. Historic and cultural preservation

- a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers ? If so, specifically describe.

Some encampments may be located in areas of the City where buildings are listed or are eligible for listing in national, state, or local preservation registers.

- b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.

Not applicable.

- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

Not applicable.

- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.

None. The Proposal will not result in a significant adverse impact to historic and cultural preservation as an element of the environment.

14. **Transportation**

- a. Identify public streets and highways serving the site or affected geographic area and describe proposed access to the existing street system. Show on site plans, if any.

As the City generally has little or no control as to where an encampment is initially sited, it is possible that encampments may develop within public right-of-ways within the City. If an encampment blocks the normal use of a right-of-way, it will be considered an obstruction and under FAS Rule 17-01, the City may immediately remove the encampment.

- b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?

Experience has shown that encampments generally materialize in areas served by public transit. This pattern reflects the fact that encampment occupants depend on public transit as they often lack access to a personal vehicle.

- c. How many additional parking spaces would the completed project or nonproject proposal have? How many would the project or proposal eliminate?

None.

- d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).

No.

- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.

No.

- f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates?

Removing encampments, monitoring emphasis areas, and providing other public services to homeless individuals living in encampments occurs through vehicular trips. It is unknown how many vehicles trips per day would occur.

- g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.

No.

- h. Proposed measures to reduce or control transportation impacts, if any:

As the Applicant anticipates that encampment occupants will use the existing public transit network (e.g., METRO) and will introduce few if any single-occupancy vehicles to the local transportation infrastructure, no mitigation of transportation impacts is necessary. Under the Proposal, encampments that obstruct the normal use of roadways and sidewalks are obstructions that may be immediately removed in order to maintain the functionality of the City's transportation infrastructure. The Proposal will not result in a significant adverse impact to transportation as an element of the environment.

15. Public Services

- a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.

As part of the Proposal (in particular, FAS Rule 17-01) imposes additional procedures on removing encampments, the Proposal may lead to an increase in: (a) the number of encampments on City-owned property; and (b) the duration of each encampment. The Applicant anticipates that the increased level of encampment activity will trigger increased demand for a variety of services, including outreach services as provided for in FAS Rule 17-01, fire including emergency medical services, and police services.

There are an estimated 400 encampments currently located across City properties. Multi-disciplinary outreach teams — typically two law enforcement officers, a team leader, two

outreach workers, and a three-to-five-person clean-up crew and their equipment — routinely operate across the City at various encampment sites. Outreach services range from furnishing something as simple as cross-town transportation to furnishing actual housing. The City’s multi-disciplinary outreach teams at times participate in encampment clean-up efforts initiated by other agencies (e.g., Washington State Department of Transportation).

The Proposal in and of itself is not expected to have a material impact on the number of homeless people living in Seattle, and therefore is not expected to change the need for public services. However, the Proposal might cause a shift in the location of encampments, requiring the City to from time to time adjust the delivery of services.

- b. Proposed measures to reduce or control direct impacts on public services, if any.

While FAS Rule 17-01’s outreach provisions, where outreach personnel must be available at an encampment removal site to offer services and alternative shelter and the personnel must remain there until the encampment removal is completed, are expected to lead to increased demand for social services in the near term, to the extent encampment occupants productively use the services, the City hopes that in the long-term there will be a decline in the need for the services. The Proposal will not result in a significant adverse impact to public services as an element of the environment.

16. Utilities

- a. Circle utilities currently available at the site:
electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system,
other _____

Encampment sites do not have utilities.

- b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.

None.

C. Signature

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: _____

Name of signee Christopher Potter

Position and Agency/Organization Director, Operations and Internal Services, City of Seattle

Department of Finance and Administrative Services

Date Submitted: _____

D. supplemental sheet for nonproject actions

(IT IS NOT NECESSARY to use this sheet for project actions)

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

See discussion above in section B, Environmental Elements.

Proposed measures to avoid or reduce such increases are: *None*

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

See discussion above in section B, Environmental Elements.

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

None.

3. How would the proposal be likely to deplete energy or natural resources?

See discussion above in section B, Environmental Elements.

Proposed measures to protect or conserve energy and natural resources are:

None.

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

As the City generally has little control as to where an encampment is initially sited, it is possible that encampments will develop within, or develop in the immediate vicinity of, areas designated for governmental protection. If an encampment is an obstruction (e.g., an encampment blocks the normal use of a ball-field within a City park) or immediate hazard (e.g., an encampment on a steep slope triggers material levels of erosion so as to pose risk of injury), FAS Rule 17-01 permits immediate removal of the encampment.

Proposed measures to protect such resources or to avoid or reduce impacts are:

See answer to the first part of question 4.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

See discussion above in section B, Environmental Elements.

Proposed measures to avoid or reduce shoreline and land use impacts are:

The Proposal's principal measures to avoid or reduce shoreline and land-use impacts are two-fold: first, in removing encampments, the City will provide encampment occupants with outreach services, and will identify if not outright provide alternative shelter; second, City may designate emphasis areas, areas where future encampments are prohibited.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

See discussion above in section B, Environmental Elements, in particular, section 15 (pertaining to Public Services).

Proposed measures to reduce or respond to such demand(s) are:

See discussion above in section B, Environmental Elements, in particular, section 15 (pertaining to Public Services).

7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.

No conflicts have been identified. If an encampment is located in an environmentally critical area and constitutes a hazard, the encampment can be immediately removed and damage to the environment remediated.