

MANDATORY HOUSING AFFORDABILITY EIS SCOPING SUMMARY

City of Seattle, Office of Planning and Community Development | November 9, 2016

1 INTRODUCTION

The City of Seattle is proposing amendments to the Land Use Code to implement Mandatory Housing Affordability (MHA) for multifamily and commercial development meeting certain thresholds. MHA would require developers either to build affordable housing on-site or to make an in-lieu payment to support the development of affordable housing throughout the city. MHA is expected to create a total of 6,000 new affordable homes over the next 10 years for low-income families and individuals.

To implement MHA, the City would make changes to the Land Use Code to grant additional development capacity in existing commercial and multifamily zones and in areas currently zoned single family in existing or expanded urban villages. A summary of the current draft of the additional development capacity in each zone can be found at

<http://www.seattle.gov/hala/focus-groups#MHA%20Development%20Examples>.

The City is proposing to prepare an Environmental Impact Statement (EIS) that will analyze three alternatives and identify the impacts of each alternative. Alternatives to be addressed in the EIS include *No Action*, or continued growth as guided by the City's Comprehensive Plan and Land Use Code standards; and two *action alternatives* that will consider growth under different development patterns and Land Use Code standards. The No Action alternative includes the 20-year growth estimate of 70,000 additional households, consistent with the *Seattle 2035 Comprehensive Plan*, and no MHA. The two Action alternatives both consider increased amounts of growth compared to the No Action alternative and implementation of MHA to create at least 8,400 affordable homes citywide.¹ The alternatives differ in whether MHA is implemented and

¹ These are citywide estimates; estimates would be lower for the particular alternatives being evaluated. MHA is expected to yield approximately 6,000 new affordable homes over the next 10 years. For purposes of this EIS analysis, this number has been extrapolated to maintain consistency with the Seattle 2035 Comprehensive Plan's 20-year

how growth and affordable homes are distributed among urban villages. Both action alternatives will evaluate increases in the maximum height and floor area limits in commercial and multifamily zones, as well as single family zones in designated urban villages and potential urban village expansion areas identified in the *Seattle 2035 Comprehensive Plan*. The primary difference between the two Action alternatives is the intensity and location of land use changes, including the extent of potential urban village boundary expansions. The proposal considered in this EIS does not include the Downtown or South Lake Union neighborhoods or the core of the University District.

The EIS analysis will incorporate and leverage information and analyses contained in the recent *Seattle 2035 Comprehensive Plan EIS* (2016), *Growth and Equity Analysis* (2016), and other recent city studies and plans.

2 EIS SCOPING

Scoping is the process of identifying the elements of the environment to be evaluated in an EIS. Scoping is intended to help identify and narrow the issues to those that are significant. Scoping includes a public comment period so that the public and other agencies can comment on key issues and concerns. Following the comment period, the City considers all comments received and determines the scope of review for the environmental analysis.

The City issued a Determination of Significance/Scoping Notice for MHA on July 28, 2016, and made it available to the public through a variety of methods (see Attachment 1). The Scoping Notice states that the EIS will consider potential impacts associated with land use, housing and socioeconomics, aesthetics and height/bulk/scale, historic resources, open space and recreation, transportation, public services, and utilities. The scoping period closed on September 9, 2016.

During the scoping period, comments were invited through the project website, via mail and email, at four HALA Community Focus Groups held in August, and at two tabling events held at the Seattle Summer Parkways in Rainier Valley on August 13, 2016, and in Ballard on August 27, 2016. Materials from the tabling events are contained in Attachment 2. In total, the City received 59 scoping comments. Summarized public scoping comments and responses to these comments are shown in the table on the following page.

All comments are summarized in Section 3 (Table of Comments) in this Scoping Summary. All letters and emails, as well as written comments received at the scoping events, may be reviewed with advance notice (contact Geoffrey.Wentlandt@seattle.gov).

planning horizon. For this reason, the City estimates approximately 8,400 affordable homes will be added within 20 years.

In response to the comments received through the scoping process, the City will make adjustments to the analysis of the environmental elements in the proposed EIS scope and the formulation of the action alternatives, compared to what was outlined in the Scoping Notice. Responses to comments in Section 3 below document areas where the City will make adjustments.

3 TABLE OF COMMENTS

The following tables summarize comments by EIS element/topic, with the City’s response to comments provided below each table.

Overall Approach

EIS TOPIC	COMMENTS
Approach to Analysis	<ul style="list-style-type: none"> • Consider impacts for each urban village individually • Consider citywide and regional impacts • Establish clear baselines for analyzing impacts in each urban village • Analyze existing conditions and impacts for each block of each urban village • Conduct a separate EIS for each area proposed to have zoning changes • Eliminate vague terms such as "slightly higher," "slightly more floor area," or "certain zones" • Include current projects under development in calculations of density and growth models, in addition to the projected growth

Response:

- While the proposal considered in this EIS is for a very broad geographical area, where information is available and would help in understanding potential impacts of the alternatives, smaller geographic areas may be examined. These include, for example, urban villages, police precincts and fire service battalions.
- The analysis will include documentation of existing conditions and identification of threshold for determining significance of impacts.
- The description of the proposal and alternatives will quantify proposed building height limits, affected zones and other data as available. The environmental analysis will quantify data and conclusions to the extent that reliable quantifiable data is available and would help inform the discussion. Where reliable quantitative data is not available, environmental analysis will rely on a qualitative and comparative review of alternatives. As established in the SEPA Rules, this is appropriate for a programmatic analysis of a legislative proposal of this scale.
- Each action alternative will be associated with a detailed zoning map and urban village boundary expansion map. Amounts and distribution of estimated growth, as well as affordable housing quantities, will be provided based on the detailed maps, and include estimations for

urban villages individually. To the extent possible, if the potential for any acute localized impacts are identified for any of the elements of the environment reviewed, discussion of such localized impacts and mitigating measures may be included.

- Pipeline development proposals will be considered in estimating future growth estimates.

Alternatives

EIS TOPIC	COMMENTS
Alternatives	<ul style="list-style-type: none"> • Include alternative(s) where growth exceeds projections • Study alternatives that include more affordable housing, with lower AMI thresholds • Broaden the range of alternatives • Consider an alternative that doesn't require demolition of existing housing stock or historic buildings • Consider alternative(s) that do not increase allowable height, floor area, or building footprint through upzones • Consider alternative(s) that require builders to provide affordable housing on site, rather than in-lieu fees • Include an alternative that focuses on non-Mandatory Inclusionary Zoning policy, like expanding the Multifamily Tax Exemption program • Consider an alternative that limits growth to the types and amounts of growth in the individual neighborhood plans

Response:

- Each alternative will be associated with a detailed zoning proposal and the alternatives will include a range of growth projections generated from these specific zoning proposals, including projections that exceed the 2035 Comprehensive Plan growth estimates.
- Consistent with SEPA Rules, the EIS will consider a reasonable range of alternatives consistent with the objectives of the proposed action. The proposed action is Mandatory Housing Affordability (MHA) consistent with the State authorized incentive program pursuant to RCW 36.70A.540 that will achieve at least 8,400 affordable homes over a 20-year period. The proposal will consider variations that can achieve the stated objective.
- The No Action Alternative, which is one of the EIS alternatives, will consider no increase in height, floor area or building footprint because of MHA. The No Action alternative includes the City's existing Incentive Zoning program.
- The proposal is not intended to limit or slow growth, so an alternative that limits growth in individual neighborhoods is not included.

- The MFTE program and other suggested programs are outside of the scope of the proposed action and are therefore not included in the alternatives.

Housing and Socioeconomics

EIS TOPIC	COMMENTS
Affordable Housing	<ul style="list-style-type: none"> • Address increased housing affordability for a range of people (economically diverse, culturally diverse, all ages, various physical abilities, etc.) • Consider the risk that MHA may result in a net zero or net loss in affordable housing • Include the ratio of affordable housing produced under HALA relative to market priced housing produced • Analyze the impacts of increased residential development on current rental units – consider rent control • Could a fee or tax such as Vancouver’s be considered for individuals or companies from out-of-state or out-of-country buying up Seattle’s real estate? • If we continue to have an overall regulatory environment where the supply of new housing is not keeping up with demand, we will continue to see a meteoric escalation in the cost of housing • Do not replace the current housing mix with more expensive multifamily housing • Need more mid-income housing • MHA driven development will accelerate our loss of moderately priced homes and decrease housing diversity • Home ownership is not attainable or affordable for mid-income families
MHA Requirements	<ul style="list-style-type: none"> • State MHA-R project objectives and basis for claims that 6,000 new affordable homes will be added over the next 10 years • Distribute where affordable housing is built with developer fees – where will the fees be spent? • Will MHA payments create public housing and/or permanently affordable housing? • In-lieu fees delay the creation of affordable homes in comparison to developer built affordable homes • Allowing developers to pay in-lieu fees instead increases the socioeconomic segregation of neighborhoods • Consider that higher fees in areas "at risk of displacement" will discourage investment in new housing in poorer less developed neighborhoods • Renters and homebuyers end up paying for the additional cost to developers from policies and constraints • Mandatory Inclusionary Zoning is bad housing policy as it inflates the price of market rate housing all over the city

EIS TOPIC	COMMENTS
Equity, Displacement, and Vulnerable Populations	<ul style="list-style-type: none"> • Describe any perceived implication for the principles of the Race and Social Justice Initiative • Accurately identify areas with a high risk of displacement • Distinguish displacement caused by development (physical) from displacement due to rising housing prices (economic) • Refine the Growth and Equity Analysis to more accurately reflect displacement risks by geographic sub-region within urban villages • Address the growing economic disparity in “hot development” neighborhoods • Consider the recent history of gentrification within each urban village • Consider options for allowing displaced families to remain in the same area • Expand urban village boundaries in strategic ways that limit impacts on vulnerable areas • Provide support for homeless communities (like tent cities) moving into more long-term housing • Explain how the City will track economic displacement due to rising rents, property taxes, etc.
Jobs/Business	<ul style="list-style-type: none"> • Consider the displacement of small businesses in urban villages due to escalating rents and increased property taxes • Address the design standards and planning needed to include affordable commercial spaces • Consider the availability of “average” jobs – working class families won’t be able to buy even if housing becomes more affordable if they don’t have access to jobs

Response:

Housing Affordability

- Housing affordability review will include an analysis of neighborhood socio-economic characteristics, current housing affordability, and the relative potential for displacement due to growth. The analysis will include an estimate of housing with potential to be demolished and replaced by redevelopment in order to characterize the potential loss of existing affordable homes. In addition, the analysis will quantify new market rate and affordable housing that is likely to be produced and discuss the likely geographic distribution of new affordable housing at income levels served by the MHA.
- Several comments suggest measures to support housing affordability separate from the MHA proposal. Potential actions outside of the scope of the proposed action are not included in the alternatives, but may be identified as possible mitigating measures.

MHA Requirements

- MHA-R objectives and basis for the 10 year 6,000 new affordable homes estimate will be described in the description of the alternatives chapter of the EIS.
- Several comments raise questions about how MHA will be implemented and administered. The EIS will include a full description of the proposed implementation of MHA.

Equity/Displacement/Vulnerable Populations

- The EIS analysis will leverage and build upon the City's Growth and Equity analysis to examine neighborhood socio-economic characteristics within the study area, current housing affordability, and the relative potential for displacement due to growth.
- The consistency of the proposal with the Race and Social Justice Initiative will be considered in the EIS Plans and Policies analysis.
- The EIS analysis will include analysis of the potential for direct displacement due to demolition.
- The analysis will include discussion of the potential for economic displacement in addition to discussion of direct physical displacement.
- Several comments propose measures, such consideration of urban village boundary expansions, to limit impacts on displacement. These measures will be considered for incorporation into the alternatives, and will be varied to determine the effectiveness of such measures to address displacement. Such actions may also be considered as mitigation measure to reduce impacts of the alternatives.
- The proposal considered in this EIS is intended to serve low-income households. Other programs in the City provide services to support the homeless in transitioning to long-term housing.
- In addition to the EIS process, the City is undertaking a companion report that focuses on a broader discussion of anti-displacement measures and identifies strategies for increasing access to opportunity for marginalized populations. This will include discussion of economic and cultural displacement. The companion study will explore a broad range of strategies to mitigate displacement not limited to housing strategies.

Jobs/Businesses

- The analysis will include a review of income and demographic characteristics of Seattle's population, based on the analysis contained in the Comprehensive Plan EIS.

Land Use

EIS TOPIC	COMMENTS
Zoning and Land Use Patterns	<ul style="list-style-type: none"> • There are enough properties already zoned multifamily and LR to provide the affordable homes needed • Zoning changes could have dramatic effects on the distribution of growth and impacts • Require zoning changes to go through individual neighborhood plans • The proposed zoning changes do not take livability values into account • Consider the impacts of institutional overlays • Allow density but slow it's pace to avoid unintended consequences • Don't just put density on arterials and don't turn all arterials into upzones • Limit allowed density (number of people per lot) of single family lots and LR1 in single family areas • Provide transition areas to single family properties • Distribute growth/density throughout the city • Increase allowable height and FAR in multifamily and single family zones (infill) to accommodate current and forecasted population growth and support increases in services, transit, diversity, etc.
Single Family Areas	<ul style="list-style-type: none"> • Analyze expanding MHA into single family zones outside of urban villages • Complete an inventory of the current number of single-family residences in LR1 zones • Single family homes are an important part of affordable housing options • Redevelopment of single family areas, whether near or in urban villages, should not be a City policy
Plans and Policies	<ul style="list-style-type: none"> • Include evaluation of the relative compliance of the alternatives with the Comprehensive Plan • Compliance with HUD Fair Housing rules • Opposition to Seattle 2035 policy LU 7.3 in general and to proposed amendments to support redevelopment in single-family areas near urban villages (not just inside)

Response:

- The land use analysis will include a review of compatibility of the proposal and alternatives with the existing and planned zoning designations and land use patterns, potential land use conflicts and impacts on overall growth distribution for all alternatives. This analysis

will include a review of existing conditions and potential impacts to single family zoned areas, but is not anticipated to include an inventory of housing by zoning category.

- The alternatives will include variations in the distribution of expected growth based on a specific zoning proposal to implement MHA. Potential impacts of the alternative distributions of growth will be evaluated.
- The EIS will include an analysis of the impacts of conversion of single family zoned areas inside urban villages, and any expanded urban village areas.
- Expansion of MHA into single family areas outside of existing or expanded urban villages is not proposed by the City and is not considered in the EIS.
- Plans and policies analysis will include a review of consistency of the alternatives with the Growth Management Act, PSRC Vision 2040, King County Countywide Planning Polices, Seattle Comprehensive Plan and Seattle Land Use Code. Based on comments received through this scoping process, the analysis will also include a review of the City of Seattle Race and Social Justice Initiative, HUD Fair Housing rules and the Seattle Climate Action Plan.

Aesthetics, Height/Bulk/Scale

EIS TOPIC

COMMENTS

Aesthetics

- How will the alternatives change the look of each urban village? What relationship will new buildings have to the existing neighborhoods? What will transition areas look like?
- Pay attention to the quality of development
- Consider the architectural character of existing development
- Consider the impacts of increased building heights and size to general neighborhood aesthetic and spatial cohesion
- Include programs, policies, and development codes to ensure visual interest of homes and the urban environment
- Evaluate and compare the impacts of the MHA code amendments and increased floor area/building height on those neighborhoods with adopted neighborhood design standards versus those without

EIS TOPIC	COMMENTS
Height/Bulk/Scale	<ul style="list-style-type: none"> • What impacts will the height, bulk, and scale of proposed zoning changes have on the surrounding areas, including potential wind tunnels, access to light, privacy, auditory disturbance, green space, building access, waste storage, and view corridors? • Be more specific than “slight” with regards to increased building height FAR, and setbacks and be specific about the zones in which these apply – heights, setbacks, and openings in the building bulk are too vague and masses too large • Focus on small-scale affordable housing (duplexes, cottages, etc.)
Shade	<ul style="list-style-type: none"> • Consider the environmental and financial impact of taller buildings shadowing solar panels, especially in zones changed from single family to multifamily • Developers should compensate preexisting shadowed solar installations or allow them to be moved to the top of the shadowing building

Response:

- The aesthetics analysis will consider street-level character, public spaces, general sun and shadowing impacts, and relationship of new buildings to existing development patterns. Based on visualizations of neighborhood prototypes, the analysis will include a discussion of neighborhood context, impacts associated with increased height, bulk, and scale of development and identification of potential measures to mitigate any identified impacts.
- The description of the proposal and alternatives will quantify proposed building height limits, affected zones and other data as available. The environmental analysis will quantify data and conclusions to the extent that reliable quantifiable data is available and would help inform the discussion. Where reliable quantitative data is not available, environmental analysis will rely on a qualitative and comparative review of alternatives. As established in the SEPA Rules, this is appropriate for a programmatic analysis of a legislative proposal of this scale.
- Compatibility with and impact on existing development standards will be considered.
- The EIS will include a qualitative analysis of shadow impacts associated with proposed increased building height and bulk.

Transportation

EIS TOPIC	COMMENTS
Traffic/Congestion	<ul style="list-style-type: none"> • Impact(s) of zoning changes on traffic – LOS and traffic delays at major intersections in urban villages and congestion citywide • Analyze the impacts on arterial traffic as well increased traffic diverted to side streets • Impact of increased housing density on freight mobility • Improve gridlock by focusing density into walkable neighborhoods supported by mass transit • Affordable housing should help ensure commute times are lower and traffic is reduced (e.g., live close to where you work)
Transit	<ul style="list-style-type: none"> • What impact will future light rail have on nearby land and property values and on small business currently located on the lines? • Consider expanding Commute Trip Reduction programs or expanded vanpool/carpool systems instead of light rail • Existing public transportation deficiencies in many urban villages will be exacerbated by increased density/housing – impact on public transportation capacity generally (and bus service specifically) • Light rail will not be here soon enough to support the massive population growth • Need mass transportation and/or parking around new apartment buildings
Parking	<ul style="list-style-type: none"> • Consider the impacts of new construction without parking spaces on available street parking • Plan for car ownership and establish realistic parking requirements for new developments • Impact of loss of parking to street-side businesses and residents where density and bike lanes have been put in • Consider impacts of constrained parking on low-income persons and those who can't walk far • Consider parking for delivery vehicles, schools buses, and other services not replaceable by transit
Pedestrian/Bicycle	<ul style="list-style-type: none"> • Impacts on pedestrian safety and mobility in residential areas that don't currently have sidewalks or street crossings on major arterials • Consider the need for increased pedestrian and bike paths in neighborhoods that will receive increased density • Encourage walking and biking • Ensure new sidewalks are functional for all users
Maintenance	<ul style="list-style-type: none"> • Existing streets have many paving/pothole issues, resulting in difficulties for biking, driving and walking • Increased density may lead to accelerated depreciation and earlier need for rebuilding of critical infrastructure like roads and bridges

Response:

- The transportation analysis will evaluate mobility impacts and other potential impacts, including vehicular and non-motorized circulation, transit, parking, and freight. Existing transportation system operations and functionality versus analysis of system operations under alternate patterns identified in the alternatives analysis will be analyzed. The transportation analysis will be based largely on the transportation analysis completed for the *Seattle 2035 Comprehensive Plan* updated with current information, as well as other city modal transportation plans including the City’s Bicycle Master Plan, Pedestrian Master Plan, and Transit Master Plan. The effects of Sound Transit 3 investments, if approved, will be considered in the transportation analysis.
- The analysis will analyze level of services using both the mode share measure discussed in the Draft Seattle 2035 Comprehensive Plan and the currently adopted screenline volume-to-capacity ratios. Additional metrics, based on the analysis in the Comprehensive Plan EIS, will also be analyzed.

Historic Resources

EIS TOPIC	COMMENTS
Historic Buildings	<ul style="list-style-type: none"> • Consider impact(s) of increased density on properties listed on landmark registries and properties that meet the criteria to be listed but have not yet achieved landmark status • Consider a transfer of development rights scheme to mitigate the adverse impact of zoning changes on historic resources • Specific steps to protect Seattle’s historic buildings and prevent their destruction with new developments
Archeological, Cultural Resources	<ul style="list-style-type: none"> • Precautions to limit potential disruption to cultural sensitive resources (especially for taller buildings with greater excavation depths).

Response:

- The historic resources analysis will describe the general distribution of older and potentially historic buildings and the historic patterns of development across Seattle. The impact analysis will describe the potential for MHA to result in significant changes to the historic fabric through incremental redevelopment of older neighborhoods. Mitigation measures to reduce these impacts, such as incentives for preserving

all or part of historic structures, will be described. The historic preservation analysis will focus primarily on differences, if any, from the analysis and findings in the Comprehensive Plan EIS. Material may be summarized and Comprehensive Plan EIS findings referenced.

- MHA is not proposed to be applied in designated National Register Historic Districts. No application of MHA or associated zoning changes will be studied in an Alternative, within the Districts.

Open Space, Urban Forest, Sustainability

EIS TOPIC	COMMENTS
Open Space	<ul style="list-style-type: none"> • What will be done to increase open space in various urban villages and address the city’s growing deficit? • Preserve public views and access to water • MHA will reduce private yard space and increase the burden on existing park space • Public space needs to be clearly visible and available for all – communal greenspaces, large trees, and areas that people can individually garden are essential elements for Seattle identity/character and public health
Urban Forest	<ul style="list-style-type: none"> • Examine the potential net loss of trees in rezoned areas – impact on the tree canopy and associated wildlife • Address the preservation of trees and green spaces • Opportunities for urban food production, including fruit and vegetables, will be drastically reduced with the loss of vegetated open space and trees • ‘Green Factor’ features (such as green roofs, planting strips, and green walls) are not adequate substitutes for the loss of large trees
Sustainability	<ul style="list-style-type: none"> • Consider impact(s) of construction, vegetation loss, and increased population on CO2 and other greenhouse gas emission levels • Focus on the sustainability/durability of development patterns – will the changes provide an improved city 30 years from now? • Consider the impacts to urban habitat from increased density (birds, salmon, etc.) • Quantify the environmental impacts of replacing existing housing stock types with small-scale infill housing (like ADUs) • What impacts will there be to noise levels? • How will the increased density and changes to urban form impact physical health and access to healthy foods? • Ensure that denser neighborhoods are sustainable across all dimensions – housing, transportation, utilities, and the natural environment • Encourage green building design practices in large developments and ensure that construction methods are sustainable.

Response:

- Open Space: The EIS will use the analysis for the Comprehensive Plan EIS to compare potential MHA areas with areas where gaps in open space currently exist. Impacts will be defined as areas where open space shortfalls would be increased by increased density within open space gaps. Mitigation measures such as targeting gaps for future open space acquisition will be discussed. The open space and recreation analysis will focus primarily on differences, if any, from the analysis and findings in the Comprehensive Plan EIS. Material may be summarized and Comprehensive Plan EIS findings referenced.
- Urban Forest: The EIS will build from the Urban Forest discussion included in the Comprehensive Plan EIS and incorporate updated information from the Seattle Office of Sustainability and Environment’s (OSE) 2016 update to the Tree Canopy Cover Assessment and the Urban Forest Stewardship Plan. The EIS will provide a qualitative assessment of potential impacts to the tree canopy. To the extent possible, the EIS will include a quantitative evaluation of impacts to the urban forest and tree cover. Methods to evaluate impacts on the urban forest will include a review of potential tree canopy impacts in areas that are converted from single family zoning to other zoning categories that allow greater lot coverage. The analysis will consider LiDAR data and past permit data. Measures to mitigate potential loss of tree canopy will be identified in partnership with OSE and described in the EIS.
- Sustainability: Future development that would be associated with the proposal, if adopted, would be subject to existing City of Seattle standards for sustainable development, including individual project-level SEPA review, standards for sustainable development, low impact development, and related requirements. The proposal would not impact these processes and requirements and no additional analysis of potential sustainability impact is proposed. Development standards in the proposal may consider minor modification to Green Factor requirements to enhance sustainability of future construction projects. The impact of modifications to Green Factor will be considered in the Alternatives and/or as a mitigating measure.
- Noise: The Seattle Noise Control Code (Seattle Municipal Code Chapter 25.08) is applicable to the construction and operation of all development proposed as part of the project. The Noise Code sets levels and durations of allowable daytime/nighttime operational noise and daytime construction noise. These limits are based on the zoning of the source and receiving properties. Because the proposed uses under any of the alternatives would be consistent with existing uses, no significant impacts to noise levels, as defined in the Seattle Noise Code, are anticipated.
- Greenhouse Gas (GHG) Emissions. The consistency of the proposal with the City’s Climate Action Plan will be considered in the EIS Plans and Policies analysis. The Seattle Comprehensive Plan Update EIS (2016) included an analysis of GHG emissions resulting from future growth

alternatives, including an assessment of GHG emissions associated with an increase in residential growth of 30,000 more housing units than anticipated in the City’s growth estimate. Because the proposal being considered in the MHA EIS would not result in a significantly different land use pattern or increased residential growth compared to that considered in the Comprehensive Plan EIS, no additional analysis of potential GHG emissions is needed.

- **Physical Health:** The MHA proposal considered in this EIS would focus increased development intensities within the urban villages and in multifamily and commercial areas outside of the urban villages. In these areas, existing and future development patterns are more likely to result in walkable neighborhoods with greater access to services, such as options for healthy food. Significant adverse impacts are not anticipated as a result of the proposal and no additional analysis is needed.

Public Services and Utilities

EIS TOPIC	COMMENTS
General	<ul style="list-style-type: none"> • Impact on infrastructure, such as sewers (especially those in which CSO sewage outflows into Lake Union), parks, schools, community centers, senior centers, services for the elderly and disabled, and transportation • Impose impact fees on developers so that the cost of public service and utility infrastructure improvements is shared
Schools and Community Services	<ul style="list-style-type: none"> • Impacts to school capacity/classroom size, the ability of students to attend local schools, and safe walking routes to schools • Consider impact(s) to community services for senior citizens and the disabled Make sure everyone has easy access to full library services – especially low-income and refugee families
Public Safety	<ul style="list-style-type: none"> • Plan for and propose funding for the increased demand on public safety services (police, fire, and public health) – what existing deficiencies in fire and police protection will be amplified by increased density and population? • Analyze impacts to police and fire/EMS response times • What is the existing availability and location of equipment capable of addressing emergencies in high rise structures? • Ensure adequate access for emergency service vehicles, especially in neighborhoods with existing narrow streets

EIS TOPIC	COMMENTS
Utilities	<ul style="list-style-type: none"> Analyze impacts on stormwater drainage and sewer systems under estimated growth, as well as if growth exceeds estimated levels – specifically look at existing hotspots of flooding and sewer failures within the urban villages slated for upzoning Address increased risks to water quality, public health, and environmental safety due to increased runoff from greater paved areas and discharges from untreated sewage (especially in the context of the State Shoreline Act and the CSO sewer system) Make sure electrical infrastructure is adequate

Response:

- The EIS will use the analysis and data gathered for the Comprehensive Plan EIS to disclose the potential for the proposal and alternatives to impact demand for services overall and in different geographic areas of the City. The public services and utilities analysis will focus primarily on differences, if any, from the analysis and findings in the Comprehensive Plan EIS. Material may be summarized and Comprehensive Plan EIS findings referenced.

Other

EIS TOPIC	COMMENTS
Communication and Outreach	<ul style="list-style-type: none"> Coordinate with neighboring communities/cities Need more community involvement – outreach seemed minimal and upzones should not be accomplished without proper community engagement Scoping notice did not make it clear if the scope of the EIS is focused on the MHA code amendment only or if it also includes the proposed zoning changes Bring members of affected communities to the table early in the process and educate them about potential zoning changes and what these changes may mean Need more education about why density and affordability are not at odds

Response:

- Communication: Comments are noted. Following issuance of the Draft EIS, there will be a public comment period and opportunities to provide verbal and written comment. Please see also <http://www.seattle.gov/hala> for additional information about the project and community engagement opportunities.

ATTACHMENTS

Attachment 1 Determination of Significance and Scoping Notice

Attachment 2 Scoping Informational Handout