

What's changed since the DEIS?

New information and other corrections and revisions since issuance of the DEIS are described in cross-out (for deleted text) and underline (for new text) format. Entirely new sections or exhibits may be identified by a sidebar callout instead of underline.

1



SUMMARY.

This chapter summarizes the findings of this Final Environmental Impacts Statement (FEIS) with respect to environmental impacts, mitigations measures, and significant unavoidable adverse impacts for ~~three~~ four alternatives for the proposed action to implement Mandatory Housing Affordability (MHA) in the study area. This summary provides a brief overview of the information considered in this EIS. The reader should consult Chapter 2 for more information on the alternatives and Chapter 3 for more information on the affected environment, environmental impacts, and mitigation measures for each alternative and element of the environment.

The FEIS includes a Preferred Alternative that is a modified proposal to implement MHA based on community input and comments on the Draft EIS. The Preferred Alternative combines elements of the action alternatives considered in the Draft EIS. This FEIS also contains additional analysis of several topics identified for further study based on Draft EIS comments.

The FEIS identifies changes to the text made since publication of the Draft EIS using ~~strikeout~~ and underline. More substantial text changes are indicated with a note in the margin where an entirely new section or exhibit is added.

1.1 PROPOSAL

The City of Seattle seeks to address a pressing need for housing, especially affordable housing, experienced by households and residents across the income spectrum. The need for affordable housing is well documented and can be measured in many ways. More than 45,000 of Seattle households, or about one in seven, currently pay more than half of their income on housing, a condition referred to as severe cost burden. Average rent for a one-bedroom apartment has increased 35 percent over the last five years and is unaffordable by conventional measures to a worker earning a \$15 minimum wage.

Affordable housing is further out of reach for certain populations. Nearly 35 percent of Black/African American renter households in Seattle pay more than half of their income on housing, compared to about 18 percent of White renter households. The City is pursuing numerous strategies to address Seattle's housing affordability challenge.

The proposal addressed in this ~~Draft~~ Final EIS is to implement MHA requirements for multifamily residential and commercial development in certain areas of Seattle. To put MHA in effect ~~place~~, the City would grant additional development capacity through area-wide zoning changes and modifications to the Land Use Code. The proposed action includes several related components:

- Adopt requirements in the Land Use Code (SMC Chapter 23) for developers either to build affordable housing on-site or to make an in-lieu payment to support the development of rent- and income-restricted housing when constructing new development meeting certain thresholds.
- Modify development standards in the Land Use Code to provide additional development capacity, such as increases in maximum height and floor area ratio (FAR) limits.
- Make area-wide zoning map changes.
- Expand the boundaries of certain urban villages on the Comprehensive Plan's Future Land Use Map (FLUM) near high-frequency transit, as studied in the Seattle 2035 Comprehensive Plan.
- Modify certain rezone criteria in the Land Use Code.

Additional development capacity would allow for the construction of more floor area, more housing units, or greater building height and scale compared to what existing regulations allow. In turn, this additional capacity may lead to additional household or job growth compared to the growth that would otherwise occur. Although it brings many benefits to a city, household and job growth can also have impacts to elements of the environment, such as services, transportation, and parks and open space. This ~~Draft~~ Final EIS evaluates potential environmental impacts associated with alternative approaches to implementing MHA.

STUDY AREA

The study area for this EIS includes existing multifamily and commercial zones in Seattle, areas currently zoned Single Family Residential in existing urban villages, and areas zoned Single Family Residential in potential urban village expansion areas identified in the Seattle 2035

Comprehensive Planning process. The study area does not include the Downtown, South Lake Union, and Uptown Urban Centers; in each of these sub-areas a separate planning process has implemented or will implement increases in development capacity and MHA requirements with its own independent SEPA analysis. The study area also excludes the portion of University Community Urban Center addressed in the University District Urban Design Framework and EIS. A map of the study area is in Exhibit 2–1.

1.2 OBJECTIVES OF THE PROPOSAL

The City’s objectives for this proposal are to:

- Address the pressing need for housing affordable and available to a broad range of households.
- Increase overall production of housing to help meet current and projected high demand.
- Leverage development to create at least 6,200 net new rent- and income-restricted housing units serving households at 60 percent¹ of the area median income (AMI) in the study area over a 20-year period.
- Distribute the benefits and burdens of growth equitably.

1.3 PLANNING CONTEXT

SEATTLE 2035 COMPREHENSIVE PLAN

In October 2016, the City Council adopted the Seattle 2035 Comprehensive Plan, a major update to the prior Comprehensive Plan. The City prepared an EIS on the Comprehensive Plan update that evaluated potential environmental impacts of alternative distributions of housing and job growth. The Final EIS was released on May 5, 2016, and, consistent with the provisions of the State Environmental Policy Act (SEPA), is formally adopted in this EIS to provide current and relevant environmental information. The Seattle 2035 Final EIS identified a significant unavoidable adverse housing impact, stating that Seattle would continue to face a housing affordability challenge under all of the

¹ The majority of MHA rent-restricted affordable units will serve the 60% AMI level, however some small studio units will serve 40% AMI, and some home-ownership units may serve households up to the 80% AMI level.

growth alternatives studied. The proposed MHA program evaluated in this EIS is one action the city is studying to partially mitigate the housing affordability challenge.

The Seattle 2035 Comprehensive Plan and EIS provide key context for the MHA proposed action, and this EIS builds on the prior analysis. The MHA EIS uses the same 2035 planning horizon as the Seattle 2035 Comprehensive Plan and EIS. The No Action alternative in this MHA EIS closely parallels the preferred alternative of the Seattle 2035 Comprehensive Plan Final EIS. The environmental analysis of the Action Alternatives for MHA implementation in this EIS study the potential for housing and job growth that is greater than the estimates adopted in the Seattle 2035 plan. These larger growth amounts are similar to the increment of additional growth that was studied in a 'sensitivity analysis' in the Seattle 2035 Final EIS, which also studied additional growth in anticipation of potential future strong demand for housing.

GROWTH AND EQUITY ANALYSIS

City policies call for reducing racial and social disparities, achieving equity through growth, and conducting equity analyses before taking policy actions. As a companion document to the Seattle 2035 EIS, the City prepared a Growth and Equity Analysis to identify how growth could benefit or burden marginalized populations (Appendix A). The MHA EIS strives to meet these policy objectives by integrating consideration of the Growth and Equity Analysis into the formation and the analysis of the alternatives studied. (See Chapter 2 and Appendix A for more information on the Growth and Equity Analysis).

The Growth and Equity Analysis considered people and places. The findings are expressed as the Displacement Risk Index and the Access to Opportunity Index. The Displacement Risk Index identifies areas of Seattle where displacement of marginalized populations may be more likely to occur. The Access to Opportunity Index identifies populations' access to certain key determinants of social, economic, and physical well-being. Together, these indices show that displacement risk varies across Seattle neighborhoods, and key determinants of well-being are not equitably distributed, leaving many marginalized populations without access to factors necessary to succeed and thrive in life.

Urban villages are categorized into four types based on the Growth and Equity Analysis, as listed in Exhibit 1–1. The EIS action alternatives summarize the potential impacts and environmental benefits for these four categories of urban villages.

Exhibit 1–1 Urban Village and Center by Displacement Risk and Access to Opportunity Typology

Study Area Urban Village or Urban Center		
High Displacement Risk and Low Access to Opportunity	<ul style="list-style-type: none"> • Rainier Beach • Othello • Westwood-Highland Park 	<ul style="list-style-type: none"> • South Park • Bitter Lake Village
Low Displacement Risk and High Access to Opportunity	<ul style="list-style-type: none"> • Green Lake • Roosevelt • Wallingford • Upper Queen Anne • Fremont • Ballard • Ravenna 	<ul style="list-style-type: none"> • Madison-Miller • Greenwood-Phinney Ridge • Eastlake • Admiral • West Seattle Junction • Crown Hill
High Displacement Risk and High Access to Opportunity	<ul style="list-style-type: none"> • Columbia City • Lake City • Northgate • First Hill-Capitol Hill 	<ul style="list-style-type: none"> • North Beacon Hill • North Rainier • 23rd & Union–Jackson
Low Displacement Risk and Low Access to Opportunity	<ul style="list-style-type: none"> • Aurora–Licton Springs • Morgan Junction 	

Source: City of Seattle, 2017.

MANDATORY HOUSING AFFORDABILITY (MHA) FRAMEWORK

The Seattle Municipal Code (SMC) Chapters 23.58.B and 23.58.C already contains an adopted framework for MHA affordable housing requirements. These codes establish many basic MHA program parameters and regulations, such as the income qualifications and duration of affordable housing term. However, MHA does not apply anywhere unless and until the City Council adopts legislation for zoning changes to increase development capacity. Both action alternatives reflect the program elements of MHA already established by code.

Developers would comply with MHA by either providing affordable housing on-site (performance option) or paying into a fund that the Office of Housing (OH) uses to support the creation and preservation of affordable housing throughout Seattle (payment option). Overall, if implemented in the study area MHA would require from 5 percent to 11 percent of housing built to be income-restricted affordable in the performance option, or would require payments ranging from \$7.00 to \$32.75 per square foot for residential development for the payment option.

MHA requirements would vary based on geographic areas of the city, and the scale of the zoning change. Higher MHA requirements would apply in strong market areas, and lower MHA requirements in weaker market areas. Larger development capacity increases (i.e., bigger zoning

changes) would also result in higher affordable housing requirements. The scale of the zoning change and amount of the MHA requirement would be indicated by an (M), (M1), or (M2) suffix at the end of the zone title. These suffixes (M), (M1), and (M2) tiers would be an indication of the degree of the MHA change in an area, with larger changes for (M1) tier capacity increases, and the largest degree of change in areas of (M2) capacity increases.

1.4 ALTERNATIVES

~~The City FEIS has identified three four alternatives: a No Action alternative, which is required by SEPA, and three action alternatives, which would implement MHA in different ways. The FEIS reviews the three alternatives that were evaluated in the Draft EIS along with a new Preferred Alternative that combines elements of the DEIS action alternatives. None is formally proposed or preferred at this time. Modified alternatives and/or a preferred alternative may be identified in the Final EIS.~~

ALTERNATIVE 1 NO ACTION

Alternative 1 assumes that MHA is not implemented in the study area; no development capacity increases or area-wide rezones would be adopted, and there would be no urban village boundary expansions. Overall growth would be similar to the scenario described in the adopted Seattle 2035 Comprehensive Plan.

ACTION ALTERNATIVES

~~Alternatives 2, and 3, and the Preferred Alternative all both~~ assume implementation of MHA to achieve the stated objectives. The total amounts of growth and MHA income-restricted affordable housing is similar ~~between in Alternatives 2, and 3, and the Preferred Alternative.~~ However, ~~Alternatives 2 and 3~~ the action alternatives differ in the intensity and location of development capacity increases and the patterns and amounts of housing and job growth across the city that could result. The size of urban village boundary expansions for different urban villages also varies ~~between among Alternatives 2, and 3, and the Preferred Alternative.~~ Each action alternative is associated with a detailed zoning map and a set of urban village boundary expansions (See Appendix H).

The location and intensity of zone changes, and the urban village boundary expansions varies between Alternatives 2 and 3 based on

different approaches to the urban village displacement risk and access opportunity types. The intent is to test whether and how the policy objective of growing equitably is achieved by directing more growth to areas of opportunity, and moderating growth in areas at high risk of displacement, as well as measuring other potential environmental impacts associated with the amount and location of additional growth. The Preferred Alternative also considers the displacement risk and access to opportunity typology and introduces additional topics of emphasis to guide the MHA zoning changes.

Alternative 2

Alternative 2 implements MHA, applying specific zoning map changes based on a set of basic planning concepts, policies in the Comprehensive Plan, and MHA Implementation Principles developed during community engagement. However, it does not specifically consider risk of displacement or access to opportunity when allocating development capacity increases to individual urban villages. Under Alternative 2, incrementally greater density of housing and employment would occur in the same overall pattern and proportions identified in the Seattle 2035 Comprehensive Plan.

Alternative 3

Alternative 3 uses the same guiding concepts but allocates more or less development capacity based on each urban village's relative level of displacement risk and access to opportunity, as identified in the Growth and Equity Analysis. The overall pattern and distribution of growth in Alternative 3 also follows the Urban Village and Centers growth strategy. Under Alternative 3 incrementally greater density of housing and employment would occur within the same overall pattern of the Seattle 2035 Comprehensive Plan. Alternative 3 would focus relatively more housing and job growth in areas with high access to opportunity, and relatively less in areas with high risk of displacement.

Preferred Alternative

The Preferred Alternative is a hybrid of Alternatives 2 and 3 with features most similar to Alternative 3. Specific MHA development capacity increases would be based on the guiding concepts, MHA Implementation Principles, and guidance from the Comprehensive Plan. The Preferred Alternative would also consider each urban village's relative level of

displacement risk and access to opportunity. In addition, the Preferred Alternative would apply a distribution of zoning capacity increases that emphasizes:

- Increasing housing and jobs near transit nodes
- Moderating development capacity increases in areas with environmental constraints
- Increasing development capacity on known sites of future affordable housing development

The amount of commercial development and resulting job growth would also vary ~~between~~ among the Alternatives. Under No Action, 51,734 additional jobs are expected over 20 years, which would increase to 59,786 and 59,496 in Alternative 2 and Alternative 3 respectively, and 60,410 in the Preferred Alternative.

The number of new income-restricted affordable housing units that would be generated by development in the study area under each alternative study is estimated. The term “Generated” is used to describes MHA or Incentive Zoning (IZ) performance units and units funded with MHA or IZ payments from new development in the study area.

MHA has already been implemented in several neighborhoods outside the study area, including Downtown, South Lake Union, and the University District. MHA payments generated by development in these other neighborhoods would also fund affordable units raising the total number that would be built in the study area under all ~~three~~ four alternatives. Detailed discussion of the total number and distribution of income-restricted affordable housing units is including in Section 3.1 Housing and Socioeconomics.

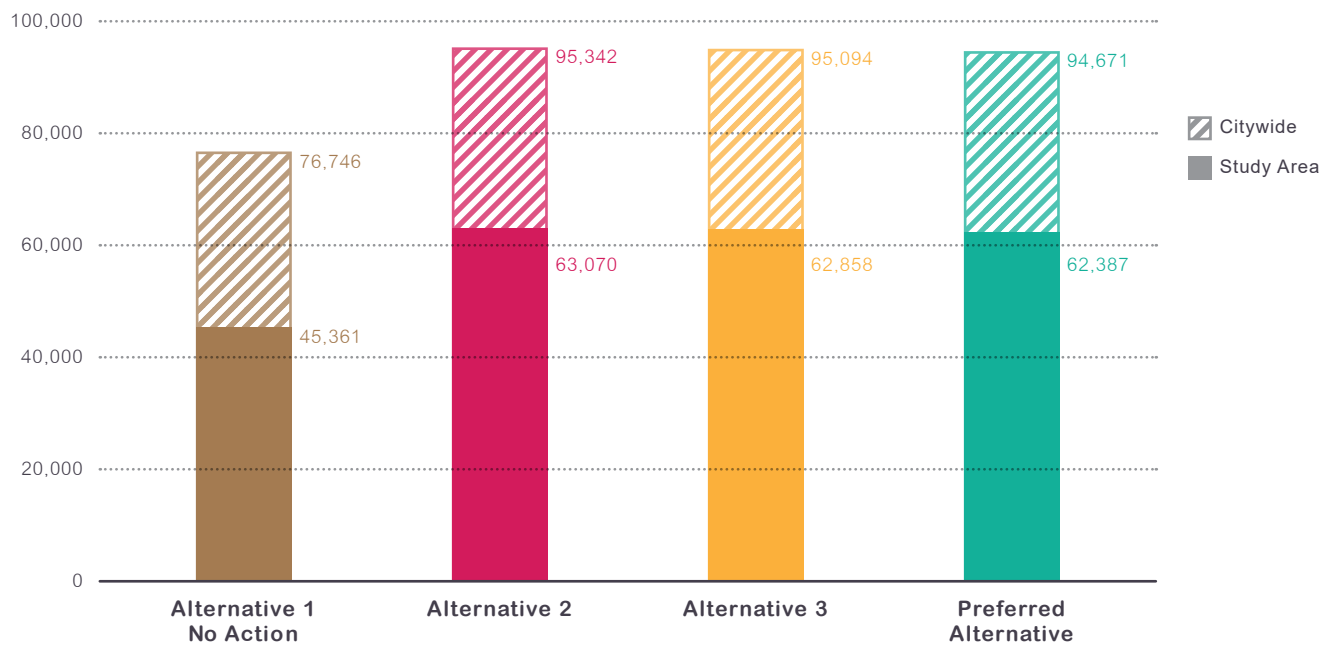


Exhibit 1-2 Total Household Growth, 20 Years

Source: City of Seattle, 2017.

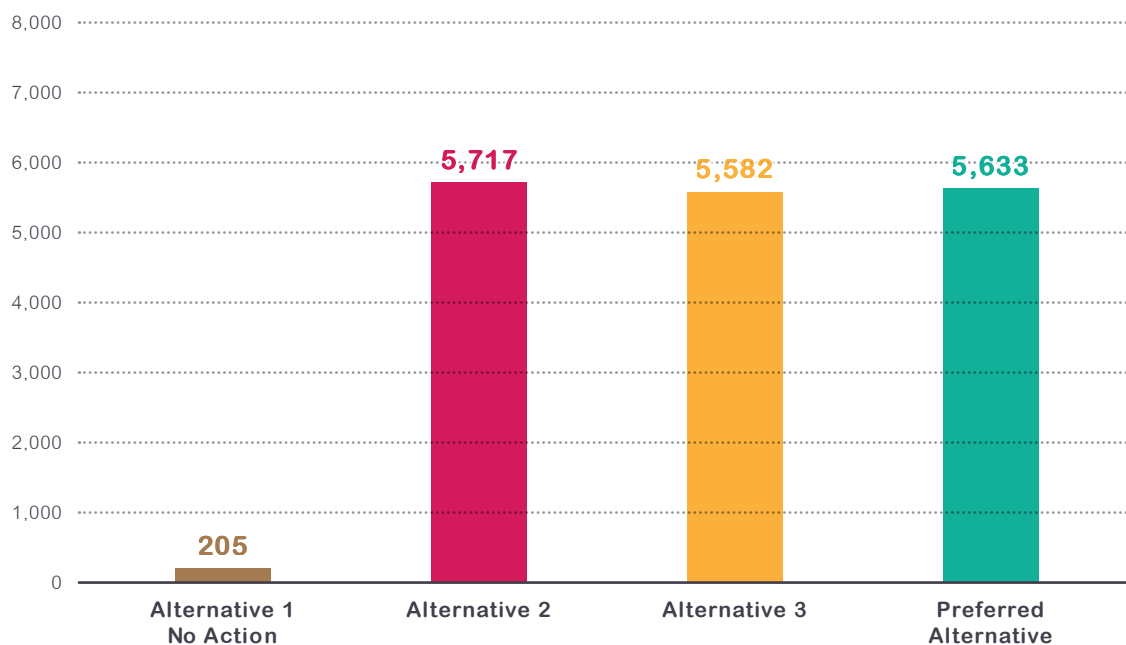


Exhibit 1-3 Income-Restricted Affordable Housing Units Generated from Study Area, 20 Years

Source: City of Seattle, 2017.

Exhibit 1–4 Approach to MHA Development Capacity Increases, Alternative 2

Displacement Risk and Access to Opportunity	Development Capacity Increases and Expansion of Urban Village Boundaries
Not used explicitly to influence the location and amount of additional growth	<p>Apply development capacity increases using basic planning concepts, Comprehensive Plan policies and Land Use Code criteria, and MHA implementation principles, resulting in a mix of (M), (M1), and (M2) designations.</p> <p>Apply urban village boundary expansions to a full 10-minute walkshed from the frequent transit station.</p>

Source: City of Seattle, 2017.

Exhibit 1–5 Approach to MHA Development Capacity Increases, Alternative 3

Displacement Risk and Access to Opportunity	Intensity of Development Capacity Increases and Expansion of Urban Village Boundaries
High Displacement Risk and Low Access to Opportunity	<p>Apply small development capacity increases resulting in a high proportion of MHA (M) designations, with limited instances of (M1), and no (M2) designations.</p> <p>Apply smaller urban village boundary expansions to a 5-minute walkshed or less from the frequent transit station.</p>
Low Displacement Risk and High Access to Opportunity	<p>Apply large development capacity increases, resulting in a high proportion of MHA (M1) and (M2) designations, along with some (M) designations.</p> <p>Apply full urban village boundary expansions to a 10-minute walkshed from the frequent transit station.</p>
High Displacement Risk and High Access to Opportunity	<p>Apply medium development capacity increases, resulting in a substantial proportion of (M) zoning changes, but also resulting in some (M1) designations and limited instances of (M2) designations.</p> <p>Apply smaller urban village boundary expansions to a 5-minute walkshed or less from the frequent transit station.</p>
Low Displacement Risk and Low Access to Opportunity	<p>Apply medium development capacity increases, resulting in a substantial proportion of (M) zoning changes but also some (M1) designations and limited instances of (M2) designations.</p> <p>Apply full urban village boundary expansions to a 10-minute walkshed from the frequent transit station.</p>

Source: City of Seattle, 2017.

Exhibit 1–6 Approach to MHA Development Capacity Increases, Preferred Alternative

Displacement Risk and Access to Opportunity	Intensity of Development Capacity Increases and Expansion of Urban Village Boundaries	Urban Villages
High Displacement Risk and Low Access to Opportunity	Primarily (M) development capacity increases throughout the urban village, except some (M1) and very limited (M2) capacity increases within a 5-minute walk to frequent transit nodes.**	<ul style="list-style-type: none"> • Rainier Beach* • Othello* • Westwood–Highland Park • South Park • Bitter Lake
Low Displacement Risk and High Access to Opportunity	Many (M1) capacity increases and some (M2) capacity increases throughout the urban village and especially in close proximity to frequent transit nodes, along with some (M) designations.	<ul style="list-style-type: none"> • Green Lake • Roosevelt* • Wallingford • Upper Queen Anne • Fremont • Ballard* • Madison–Miller • Greenwood–Phinney Ridge • Eastlake • Admiral • West Seattle Junction* • Crown Hill* • Ravenna
High Displacement Risk and High Access to Opportunity	Mostly (M) development capacity increases throughout the urban village, except some (M1) and (M2) capacity increases in areas within a 5-minute walk to frequent transit nodes.**	<ul style="list-style-type: none"> • Columbia City* • Lake City • Northgate • First Hill–Capitol Hill • North Beacon Hill* • North Rainier* • 23rd & Union–Jackson*
Low Displacement Risk and Low Access to Opportunity	A mix of (M) and (M1) capacity increases throughout the urban village, with very limited (M2) capacity increases.	<ul style="list-style-type: none"> • Aurora–Licton Springs • Morgan Junction
All Urban Villages	<p>Apply urban village boundary expansions to a full 10-minute walkshed from the frequent transit station for areas studied in the Seattle 2035 Comprehensive Plan.</p> <p>Moderate development capacity increases in areas with environmental constraints.</p> <p>Apply (M1) or (M2) development capacity increases to sites under the purview of non-profit affordable housing entities.</p>	

* Includes a proposed urban village expansion.

** There are two small exception areas where greater than (M) tier capacity increases are included outside of the 5-minute walkshed.

Source: City of Seattle, 2017.

The location and pattern of the development capacity increases varies between the action alternatives, resulting in differing estimated levels of growth and different quantities of MHA affordable housing in various urban villages. Exhibit 1–7 summarizes the estimated percentage increase of total housing growth compared to Alternative 1 No Action. Exhibit 1–8 shows the estimated number of MHA affordable housing units built in urban villages in the different displacement risk and access to opportunity categories.

Chapter 2 describes many other aspects of the proposed action, including employment growth estimates and the size of proposed urban village boundary expansions. Since the proposed action is intended to address housing affordability, this summary focuses on housing aspects of the proposal.

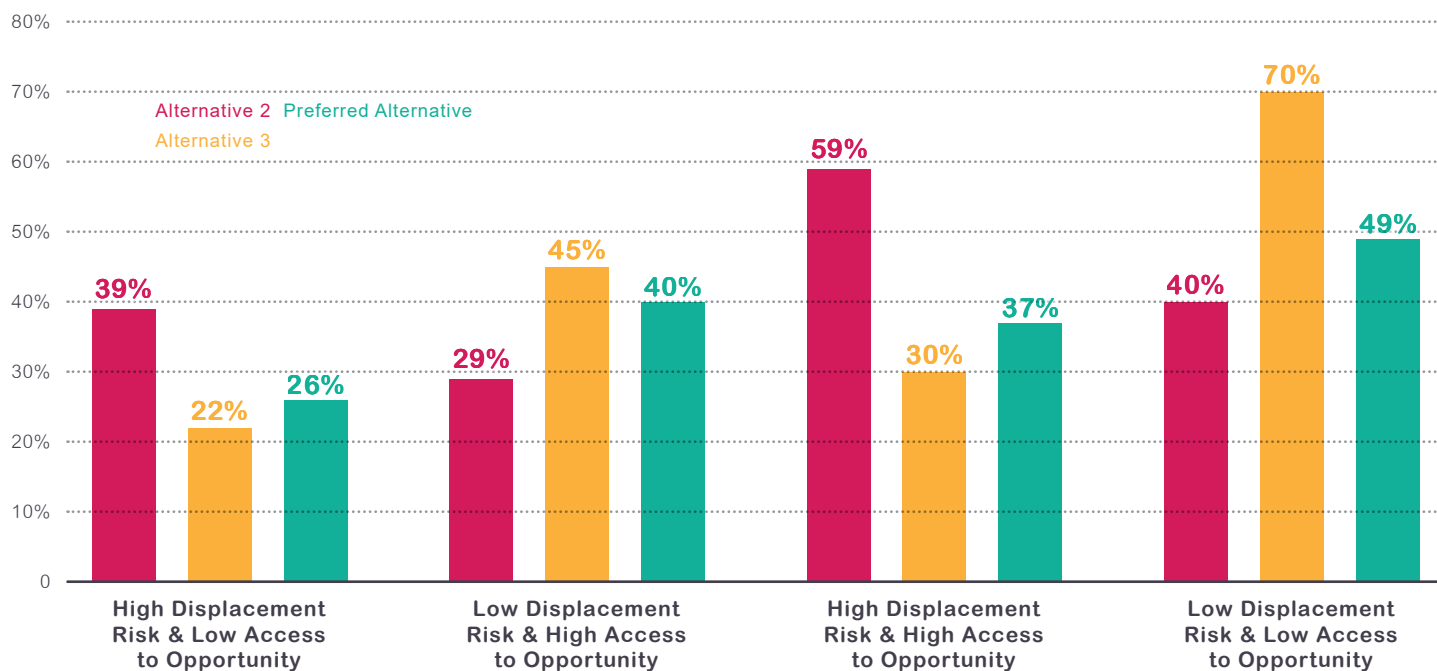


Exhibit 1-7 Percentage Increase in Housing Compared to Alternative 1 No Action

Source: City of Seattle, 2017.

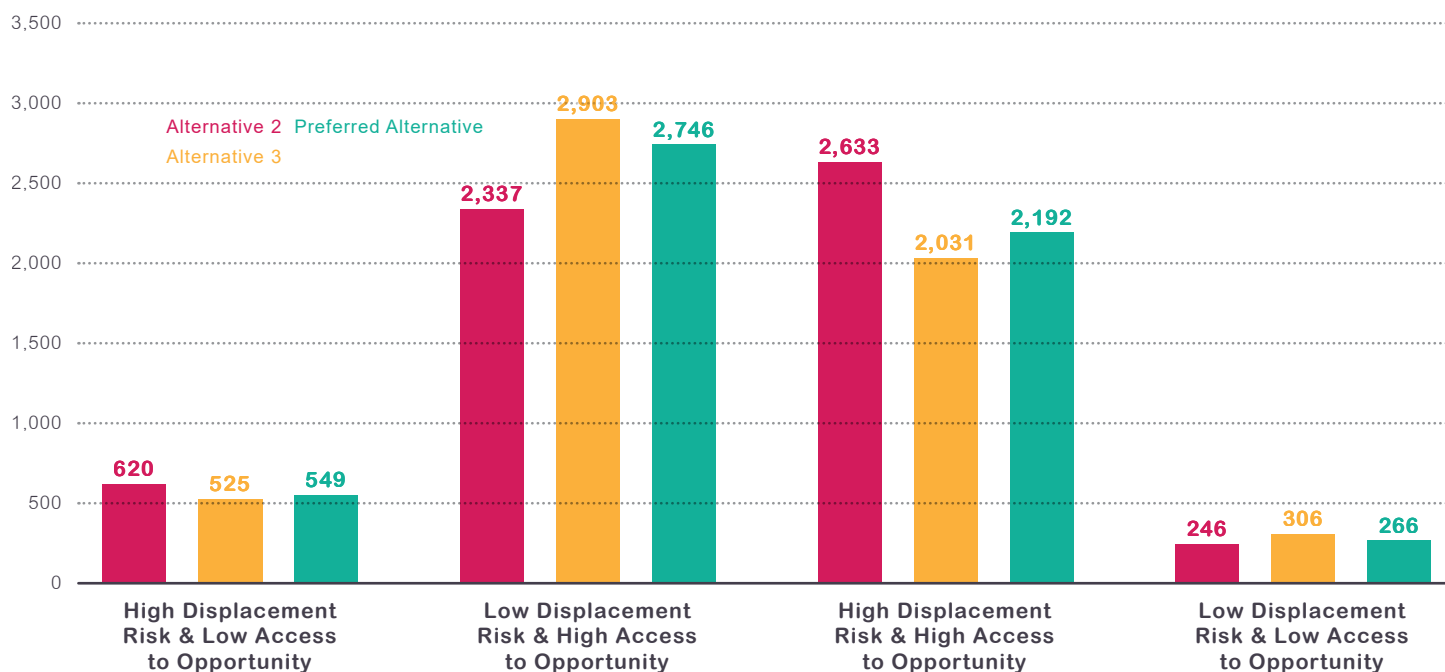


Exhibit 1-8 Income-Restricted Affordable Units Built

Source: City of Seattle, 2017.

1.5 SUMMARY OF IMPACTS AND MITIGATION STRATEGIES

The following pages summarize impacts of the alternatives and mitigation strategies for each element of the environmental analysis. This is an overview of conclusions about impacts and mitigation and is not intended to be a substitute for the comprehensive analysis contained in the ~~Draft~~ Final EIS. Chapter 3 has a complete discussion of impacts and mitigation strategies for each element of the environment.

HOUSING AND SOCIOECONOMICS

Major Additions or Revisions in the FEIS

The following substantial additions or revisions were added to Section 3.1 Housing and Socioeconomics since the Draft EIS was published. Areas of additional analysis respond to comments received from agencies and the public.

- Analysis of the impacts of the Preferred Alternative
- Historical context of racial segregation
- Expanded discussion of racial and ethnic composition of neighborhoods
- Expanded economic displacement analysis
- Expanded qualitative analysis of cultural displacement

Impacts Common to All Alternatives

The affordability of market-rate housing would continue to be a concern and a burden for many residents under all ~~three~~ four alternatives, notwithstanding the significant contribution from implementation of MHA. This is a result of economic forces beyond the reach of MHA.

Housing Supply

- All three alternatives have sufficient capacity to accommodate planned growth, but Alternative 2, ~~and~~ Alternative 3, ~~and~~ the Preferred Alternative are better able to accommodate strong housing growth than Alternative 1 No Action because they increase total capacity for housing.
- Alternatives 2, ~~and~~ 3, ~~and~~ the Preferred Alternative provide greater housing capacity and supply in lowrise, midrise and residential small lot housing, which have the potential to diversify the supply of new housing.

Housing Affordability

- Alternatives 2, ~~and 3,~~ and the Preferred Alternative would provide increased market-rate housing supply, which is likely to reduce upward pressure on market-rate housing costs compared to Alternative 1 No Action.
- For low-income households, the most significant positive impact on housing affordability will be the production of new income-restricted affordable units.
- While all alternatives result in some new income-restricted affordable units in the study area, the action alternatives would generate about 28 times more rent- and income-restricted units than Alternative 1 No Action.
- Increased production of rent- and income-restricted units would disproportionately serve people of color because low-income households are more likely to be households of color and because subsidized housing programs have historically served high percentages of non-white households.

Displacement

- Alternatives 2, ~~and 3,~~ and the Preferred Alternative could result in more total demolished units than Alternative 1 No Action.
- Alternatives 2, ~~and 3,~~ and the Preferred Alternative would produce more new housing in the study area for every demolished unit—about 14 new units for every demolition compared to 10 under Alternative 1 No Action.
- Based on assumptions, ~~about~~ approximately 13 new affordable units would be built in the study area in Alternatives 2, ~~and 3,~~ and the Preferred Alternative, for every ~~displaced~~ low-income household that would be displaced.
- Additional housing supply provided in Alternatives 2, ~~and 3,~~ and the Preferred Alternative would reduce economic displacement pressures compared to Alternative 1 No Action. However, impacts could vary by neighborhood.
- Overall, loss of low-income households does not appear to be correlated with areas of rapid housing growth based on a historical analysis.
- Additional housing and job growth under the action alternatives and Preferred Alternative could incrementally increase the likelihood of cultural displacement of racial and ethnic minority populations compared to Alternative 1 No Action.

Alternative 1

Alternative 1 No Action would not implement MHA in the study area and would result in substantially less affordable housing than the action alternatives, providing less direct positive impact to low-income households. Alternative 1 would also provide less market-rate housing supply, which provides weaker moderation of upward pressures on market-rate housing costs compared to the Action Alternatives. The amount of physical displacement could be slightly lower under Alternative 1 (using one estimation technique). However, the smaller growth in housing supply compared to the action alternatives could result in greater upward pressure on housing costs and additional economic displacement.

Alternative 2

Under Alternative 2 an estimated 7,513 new affordable units would be built in the study area, about 4,358 more affordable units than Alternative 1, resulting in much greater direct positive impacts for low income households than No Action. Total housing growth would be roughly the same as Alternative 3. The distribution of positive and adverse housing impacts varies for urban villages of different displacement risk and access to opportunity types.

Compared to Alternative 3, Alternative 2 would generate more total housing production in high displacement risk and low access to opportunity areas like Rainier Beach, Othello, and Westwood–Highland Park, and less total new housing in areas with low displacement risk and high access to opportunity like Green Lake, Wallingford, and Madison–Miller. As a result, new market-rate housing would provide a weaker moderating effect on upward pressure on market rents in some of the city’s highest cost neighborhoods, compared to Alternative 3.

Areas with high displacement risk and high access to opportunity, such as Columbia City, First Hill–Capitol Hill, and North Beacon Hill are assumed to receive the greatest share of new affordable housing in Alternative 2. This provides positive impacts, as it increases the number of low-income households able to find affordable housing in areas with high displacement risk that also provide good access to opportunity. Conversely, compared to Alternative 3, Alternative 2 would yield fewer rent- and income-restricted MHA housing units in areas with low displacement risk and high opportunity like Green Lake, Wallingford, Madison–Miller, and Ballard. This would result in fewer affordable housing opportunities in neighborhoods where housing costs are among the city’s highest.

Alternative 2 would result in a similar total number of low-income households experiencing physical displacement compared to Alternative 3. The pattern of displacement would vary between these alternatives, with Alternative 2 expected to result in slightly more physical displacement in areas with high displacement risk. However, throughout the city as a whole, there is little difference between Alternative 2 and Alternative 3 in the amount of total expected physical displacement of low-income households.

Alternative 2 focuses more growth in urban villages with high displacement risk and high access to opportunity. This additional housing supply has the potential to reduce economic displacement pressures in those same neighborhoods. However, new growth also has the potential to attract new amenities that could increase housing demand and potentially increase economic displacement in some neighborhoods, even while reducing economic displacement pressures in the city as a whole.

Alternative 3

Alternative 3 is expected to result in production of 7,415 new affordable units in the study area, significantly more than Alternative 1 and about the same amount as Alternative 2. In Alternative 3, areas with low displacement risk and high access to opportunity, such as Madison–Miller, Wallingford, and Ballard, are assumed to receive the greatest share of new affordable housing. More rent- and income-restricted housing in these locations would have a positive housing impact because more low-income households could live in areas with high average housing costs and good access to opportunity.

The greatest share of new housing growth would occur in areas with low displacement risk and high access to opportunity like Green Lake, Wallingford, Madison–Miller, and Ballard. Given the strong housing demand in these neighborhoods, additional housing could result in more housing opportunities in these neighborhoods and provide a positive impact in the form of less upward pressure on housing costs here.

Alternative 3 is estimated to produce fewer new income-restricted affordable units in areas with high displacement risk and high access to opportunity, such as Columbia City, North Beacon Hill, and 23rd & Union-Jackson, compared to Alternative 2. Many of these neighborhoods also have historically high percentages of people of color. It may be concluded, therefore, that Alternative 3 provides weaker direct affordable housing benefits to low-income households who wish to gain or

retain access to these neighborhoods in the form of income restricted affordable housing, compared to Alternative 2.

Alternative 3 would result in a similar total number of low-income households experiencing physical displacement compared to Alternative 2. The pattern of displacement would vary between these alternatives, with Alternative 3 expected to result in slightly more physical displacement in areas with high access to opportunity. However, throughout the city as a whole, there is little difference between Alternative 2 and Alternative 3 in the amount of total expected physical displacement of low-income households.

Alternative 3 focuses less growth in urban villages with high displacement risk and high access to opportunity, like 23rd & Union–Jackson, and First Hill–Capitol Hill. Compared to Alternative 2, the smaller supply of both market-rate housing and new affordable housing in these neighborhoods has the potential to increase economic displacement pressures in those neighborhoods.

New to the FEIS

Preferred Alternative is a new section since issuance of the DEIS

Preferred Alternative

The Preferred Alternative is expected to result in production of 7,418 new affordable units in the study area, significantly more than Alternative 1 and similar to Alternatives 2 and 3.

Like Alternative 3, areas characterized by low displacement risk and high access to opportunity are assumed to receive the greatest share of new affordable housing (2,746 units); the quantity would be greater than Alternative 2 (2,337), but slightly less than Alternative 3 (2,903). This would result in a positive impact of more low-income households gaining access to neighborhoods with high average housing costs and good access to opportunity.

The Preferred Alternative is estimated to produce fewer new income-restricted affordable units in areas with high displacement risk and high access to opportunity, such as Columbia City, North Beacon Hill, and 23rd & Union–Jackson (2,192), compared to Alternative 2 (2,633), and slightly more than Alternative 3 (2,031). Therefore, the Preferred Alternative would provide slightly greater direct affordable housing benefits to low-income households who wish to gain or retain access to these neighborhoods compared to Alternative 3, but less than Alternative 2.

The Preferred Alternative is estimated to result in a similar total number of low-income households experiencing physical displacement compared to Alternatives 2 and 3.

Estimated total housing growth in eight urban villages with high proportions of people of color in the Preferred Alternative (8,641 units) is less than Alternative 2 (9,590 units) and greater than Alternative 3 (8,074 units). Therefore, cultural displacement pressure under the Preferred Alternative in these neighborhoods could be expected to be less than under Alternative 2, but greater than under Alternative 3.

Mitigation Measures

The following strategies are identified to address significant housing affordability challenges and displacement of vulnerable populations.

Incorporated Plan Features

- By implementing MHA in the study area while increasing development capacity, the action alternatives provide increased housing supply and additional rent-restricted affordable housing.
- The Preferred Alternative moderates development capacity increases in urban villages with high displacement risk. These urban villages generally tend to have relatively higher percentages of racial and ethnic minority populations. Moderating growth capacity in these areas would mitigate the potential for cultural displacement.

Housing Affordability

- In addition to increasing housing choice by strategically locating new affordable housing investments, Office of Housing can work with private owners to ensure that affordable units are affirmatively marketed to those with higher barriers to accessing housing.
- Continue to use additional sources to fund preservation and creation of affordable housing, including the Federal low-income housing tax credit (LIHTC) program and the voter-approved Housing Levy.
- Use the public-private Regional Equitable Development Initiative (REDI) Fund to help finance the acquisition of property along transit corridors to preserve the affordability of future housing and community facilities.
- Continue to make the Multifamily Tax Exemption (MFTE) program available to incentivize builders to rent- and income-restrict 20 percent or more of housing units in new multifamily structures, in exchange for a partial property tax exemption for up to 12 years.
- The development capacity increases in the action alternatives could be implemented with Incentive Zoning if implementation of MHA did not occur.
- ~~Seek state legislation to enact a local-option property tax exemption for existing rental homes. The Preservation Tax Exemption could create a~~

~~local option for a 15-year tax exemption for property owners in the private market who agree to set aside 25 percent of units in their buildings for low-income tenants.~~

- Partner with major employers to contribute to a City fund that builds and preserves affordable housing.
- Pursue state legislation to authorize a local option Real Estate Excise Tax (REET) to allow municipalities to re-capture a portion of increased land value upon the transfer of property and reinvest it in critical affordable housing infrastructure.

Anti-Displacement

- Increase the effectiveness of the Tenant Relocation Assistance Ordinance (TRAO) by providing assistance to tenants with language barriers or those suffering from mental illness or cognitive disabilities, revising the definition of “tenant household,” and seeking authorization in State law to increase the income eligibility level for TRAO payments.
- Continue and expand the Equitable Development Initiative (EDI), a set of strategies that emerged from the Growth and Equity Analysis. EDI involves many City departments coordinating to address equity in underserved communities and displacement as Seattle grows.
- To curb potential cultural displacement, seek new funding sources and expand existing sources to support commercial space for culturally significant businesses or cultural institution tenants. Implement strategies in the May 2017 report “30 Ideas for the Creation, Activation, and Preservation of Cultural Space” (the CAP report)

Significant Unavoidable Adverse Impacts

Implementing MHA cannot meet the City’s entire need for affordable housing. Seattle will continue to face housing affordability challenges. Implementing MHA in the study area would be a step towards mitigating the housing affordability challenge identified in the Seattle 2035 Comprehensive Plan, but it would not fully alleviate the need for affordable housing. Some demolition of housing and displacement of existing residents will occur with or without MHA. Housing costs will continue to be a burden for a segment of Seattle’s population due to high demand and competition for housing generated by a strong job market and attractive natural and cultural amenities. Therefore, even with implementation of MHA in the study area, Seattle will continue to face a significant challenge in the area of housing affordability. This condition is a result of market and economic forces, however, and not an impact of MHA.

LAND USE

Major Additions or Revisions in the FEIS

The following substantial additions or revisions were added to Section 3.2 Land Use since publishing the Draft EIS. Areas of additional analysis respond to comments received.

- Analysis of the impacts of the Preferred Alternative
- Updates to reflect recent amendments to the Design Review program
- Additional mitigation measures for land use impacts

Impacts Common to All Alternatives

Under all alternatives, Seattle would likely experience continued housing and employment growth. Under all alternatives, most future growth would occur in urban centers and urban villages, as encouraged by Comprehensive Plan policies. Because Alternative 1 No Action would not implement MHA or modify existing land use regulations, the following discussion pertains to Alternatives 2, and 3, and the Preferred Alternative and describes the impacts of these ~~two~~ three alternatives relative to what would be allowed under existing zoning and development regulations.

Overall, at the citywide scale, land use impacts may be summarized as follows:

- Changes to land use patterns would be consistent with the overall Comprehensive Plan strategy.
- Denser and more intensive housing and commercial development would occur primarily in existing and expanded urban villages.
- Changes would result in gradual shifts from single-family to multifamily or mixed residential and commercial uses, primarily in urban villages and urban village expansion areas.
- Changes would result in gradual intensification of density, use, and scale in all rezoned areas over time.
- Most land use changes would be minor or moderate in level of impact, with significant impacts occurring in particular locations.
- Significant land use impacts would be most likely to occur near frequent transit stations, at transitions between existing commercial areas and existing single-family zones, and in areas changing from existing single-family zoning in urban villages and urban village expansion areas.

- A greater variety of housing types would occur in Seattle’s residential areas, as Residential Small Lot zoning is applied to some current single-family areas and the amount of land zoned multifamily increases, while the current high percentage of land zoned Single Family would decrease incrementally.
- In general, the potential for land use impacts and the severity of land use impacts would tend to increase as the degree of change allowed by rezoning increases, but impacts would also vary depending on the specific zoning change and location.

Development capacity increases would generally be proportional to each area’s Seattle 2035 20-year growth estimates and would result in more intense land use patterns in affected areas and some changes in building height, bulk, and scale. The boundaries of some urban villages would expand and would incorporate rezones of some land currently zoned single-family residential. As a result, compared to Alternative 1 No Action, these changes would have impacts in the form of: changes of use, density increases, and building scale increases. The degree of land use impacts ranges from minor to significant.

In general, greater land use impacts would result in areas where zoning changes allow greater development intensity, which generally corresponds with areas proposed for (M1) and (M2) tier MHA capacity increases. However, specific existing localized conditions can lead to larger or smaller land use impacts for any given zoning change. Alternatives 2 and 3 differ in the location and distribution of (M1) and (M2) zoning changes.

Alternative 2

Compared to Alternative 3, Alternative 2 would have the following relative land use impacts:

- High Displacement Risk and Low Opportunity urban villages (e.g., Rainier Beach, Othello, Westwood–Highland Park) would have a higher percentage of lands in the (M1) and (M2) tiers and more instances of moderate and significant land use impact.
- Low Displacement Risk and High Opportunity urban villages (e.g., Wallingford, Green Lake, Madison–Miller) would have a much lower percentage of lands in the (M1) and (M2) tiers and fewer instances of moderate and significant land use impact.
- High Displacement Risk and High Opportunity urban villages (e.g., First Hill–Capitol Hill, 23rd & Union–Jackson) would have a higher

percentage of lands in the (M1) and (M2) tiers and more instances of moderate and significant land use impact.

- Low Displacement Risk and Low Opportunity urban villages (e.g., Morgan Junction) would have a lower percentages of lands in the (M1) and (M2) tiers and fewer instances of moderate and significant land use impact.

Alternative 3

Compared to Alternative 2~~3~~, Alternative 3~~2~~ would have the following relative land use impacts:

- High Displacement Risk and Low Opportunity urban villages (e.g., Rainier Beach, Othello, Westwood-Highland Park) would have a lower percentage of lands in the (M1) and (M2) tiers and fewer instances of moderate, and significant land use impact.
- Low Displacement Risk and High Opportunity urban villages (e.g., Wallingford, Green Lake, Madison–Miller) would have a much higher percentage of lands in the (M1) and (M2) tiers and more instances of moderate and significant land use impact.
- High Displacement Risk and High Opportunity urban villages (e.g., First Hill–Capitol Hill, 23rd & Union–Jackson) would have a lower percentage of lands in the (M1) and (M2) tiers and fewer instances of moderate and significant land use impact.
- Low Displacement Risk and Low Opportunity urban villages (e.g., Morgan Junction) would have a higher percentages of land in the (M1) and (M2) tiers and more instances of moderate and significant land use impact.

Preferred Alternative

The pattern and distribution of land use impacts under the Preferred Alternative would resemble Alternative 3. However, the degree of land use impact under the Preferred Alternative would be generally less than under Alternative 3. Among the action alternatives, the Preferred Alternative includes the fewest instances of the most impactful (M2) capacity increase.

- High Displacement Risk and Low Access to Opportunity urban villages would have a lower percentage of lands in the (M1) and (M2) tiers compared to Alternative 2. The Preferred alternative would result in some moderate to significant land use impacts in specific locations directly adjacent to frequent transit stations, such as around the Rainier Beach light rail station.

New to the FEIS

Preferred Alternative is a new section since issuance of the DEIS

- Low Displacement Risk and High Access to Opportunity urban villages would have a notably higher percentage of lands in the (M1) and (M2) tiers and more instances of moderate and significant land use impact than Alternative 2. However, in these urban villages the percentage of lands with (M2) tier capacity increases is lower than Alternative 3. As a result, locations of potentially significant land use impact are fewer compared to Alternative 3.
- High Displacement Risk and High Access to Opportunity urban villages would have similar proportions of lands in the (M1) and (M2) tiers compared to Alternative 3, and compared to Alternative 2 would result in fewer instances of moderate and significant land use impact. Locations of moderate or significant land use impact would be focused near frequent transit nodes.
- Land use impacts in Low Displacement Risk and Low Opportunity urban villages would be expected to fall between the degree of impact under Alternatives 2 and 3.

Compared to Alternatives 2 and 3, MHA zoning map changes under the Preferred Alternative included reduce impacts to environmentally critical areas and air quality, which also result in lesser land use impact.

Mitigation Measures

Incorporated Plan Features

- Changes in intensity permitted by MHA rezones are generally minor to moderate in degree. Although some changes to land use would occur, most would not be considered significant when viewed in the context of existing land use patterns and the city's planned growth.
- Land use changes that create more gradual transitions between higher- and lower-scale zones, may mitigate land use impacts over the long term as this may achieve less abrupt edges between land uses of different scales and intensity.
- Implement a family-sized housing requirement in the LR1 zone.
- Retain a density limit for rowhouse and townhouse building types of one unit per 1,350 square feet of lot area in the LR1 zone.
- Institute a maximum dwelling unit size of 2,200 square feet in the RSL zone. This requirement will encourage infill structures of a scale similar to older stock of single-family homes.
- Add new side facade modulation and privacy standards in the Lowrise multifamily zones. (See also Section 3.3 Aesthetics).

Regulations and Commitments

- Chapter 23.41 of the Seattle Municipal Code establishes citywide requirements for Design Review. The Design Review process ensures that new development complies with adopted design guidelines and is compatible with surrounding land uses.
- In October 2017, the City Council passed Ordinance 125429 making amendments to the Design Review program. Amendments include a lower threshold for Design Review for lots rezoned from single-family within five years of the ordinance date. The lowered threshold will mitigate land use impact for existing single-family zones where MHA is implemented.

Other Possible Mitigation Measures

The following tools are available if the City wishes to provide additional mitigation of identified land use impacts:

- Amend zoning regulations in urban villages to explicitly address transitions to surrounding areas, particularly single-family residential areas adjacent to urban village boundaries.
- Implement specific regulations for infill development in urban village expansion areas to address temporary land use incompatibilities that could arise as newer, more intense development occurs alongside existing lower-intensity uses.
- Implement specialized development standards to address (M2) Tier Rezones or other land use changes that would result in a significant change of use or scale.
- Address potential land use impacts as part of neighborhood-level planning efforts.
- ~~Consider topographical changes, and reduce the proposed degree of land use change, or select a lesser intensive alternative, in specific locations where topography could exacerbate impacts~~
- ~~Consider specific block patterns and access conditions (such as lack of an alley, where mitigation will more likely be needed), and reduce the degree of land use change, or select a lesser intensive alternative, in specific locations with constraints.~~
- Create a new development standard to require or incentivize the inclusion of small businesses spaces in Neighborhood Commercial zones or pedestrian-designated zones.

Significant Unavoidable Adverse Impacts

Under all ~~three~~ four alternatives, Seattle would experience housing and job growth, and much of it is expected to occur in locations in the study area. Generally, these areas will see an increase in building height and development intensity as some areas convert from lower-density residential to higher-density patterns and a more urban character. Some of these changes to land use patterns would rise to the level of a significant land use impact; and would be an unavoidable consequence of MHA, which uses the availability of increased development capacity as an incentive to generate needed affordable housing. Such changes are also an expected and common outcome of the continuum of change of urban development form over time as urban population and employment growth occurs. Some localized land use conflicts and compatibility issues in the study area are likely to arise as growth occurs; adopted regulations and procedures would mitigate the impact of changes.

AESTHETICS

Major Additions or Revisions in the FEIS

The following substantial additions or revisions were added to Section 3.3 Aesthetics since the Draft EIS was published. Areas of additional analysis respond to comments received from agencies and the public.

- Analysis of the impacts of the Preferred Alternative
- Updates to reflect recent amendments to the Design Review program
- Review of modified development standards for the Highrise (HR) zone
- Additional mitigation measures for aesthetic impacts

Impacts Common to All Alternatives

All EIS alternatives would result in a general increase in the level of development in the study area compared to existing conditions. The increase may result from expected growth as anticipated in the Comprehensive Plan and/or an additional increment of growth from the proposed zoning changes. As described in Chapter 2, each alternative would distribute capacity for future residential and commercial growth to different areas of the city, though all alternatives would locate most future growth in urban villages.

MHA implementation under Alternatives 2, ~~and 3,~~ and the Preferred Alternative would resulting in an incremental increase in the scale and

intensity of development. The effects of this increase on development character include greater building height, bulk, and scale, as well as view obstruction and shading effects, all of which can result in aesthetic impacts. The distribution of greater or lesser aesthetic impacts in different urban villages in Alternative 2, and 3, and the Preferred Alternative parallels the distribution of greater or lesser land use impacts summarized above for Land Use, and in Chapter 3.

Mitigation Measures

Incorporated Plan Features

The Action Alternatives include features intended to reduce the negative effects associated with increased development intensity:

- Requirements for upper-level setbacks in certain zones
- Font and side façade design standards in certain zones
- Implementation of side and rear setbacks and building depth limits in certain zones
- Add new side facade modulation and privacy standards in the Lowrise multifamily zones
- Add a new tree planting requirement in the Residential Small Lot (RSL) zone
- Modify green factor landscaping requirements to place greater emphasis on ground-level landscaping and vegetation adjacent to rights-of-way
- Add area-specific design standards in new Seattle Mixed zones near the Rainier Beach and Northgate light rail stations
- To encourage taller, more slender single-tower structures in HR zones instead of bulkier two-tower developments, increase height limits to 440 feet instead of 340 feet

Regulations and Commitments

Existing policies and regulations can mitigate aesthetic impacts:

- Policies for the protection of public views
- Policies to protect open spaces from shading and shadow effects caused by development
- Citywide requirements for Design Review
- In October 2017, the City Council passed Ordinance 125429 making amendments to the Design Review program. Amendments include a lower threshold for Design Review for lots rezoned from single-family

within five years of the ordinance date. The lowered threshold will mitigate land use impact for existing single-family zones where MHA is implemented.

Other Potential Mitigation Measures

Aesthetic and urban design impacts could be further mitigated through implementation of the following or similar measures:

- For high-rise development, apply lower height limits for “podium” portions of the buildings to maintain a lower-intensity appearance at street level and reduce bulk and scale impacts on the pedestrian environment;
- Through the Design Review process, incorporate ground-level open space or mid-block pedestrian pass-throughs, promote slimmer building forms that minimize blockage of light and views, and include streetscape improvements.
- Work with neighborhood groups to create and codify neighborhood design guidelines.

Significant Unavoidable Adverse Impacts

Under all alternatives, additional growth would occur in the study area, leading to a general increase in building heights and development intensity over time, causing aesthetic impacts. The proposal includes a variety of features and development regulation amendments to minimize these impacts. In combination with the City’s adopted development regulations, Design Review process, aesthetic impacts should be reduced to less than significant levels. Therefore, no significant unavoidable adverse impacts are anticipated. In the urban context of a rapidly growing city, such changes are substantial but are also subjective in nature and are not necessarily significant impacts pursuant to SEPA. Nevertheless, some residents may perceive such changes as adverse.

TRANSPORTATION

Major Additions or Revisions in the FEIS

The following substantial additions or revisions were added to Section 3.4 Transportation since the Draft EIS was published. Areas of additional analysis respond to comments received from agencies and the public.

- Analysis of the impacts of the Preferred Alternative
- Clarification of parking impacts and mitigation

Four types of impacts were considered in this evaluation: auto and transit, pedestrian and bicycle, safety, and parking. An array of metrics were prepared for analysis purposes, including traffic operations on state highways, transit crowding, and travel time.

Auto and Transit

The analysis uses “screenlines” to evaluate auto (including freight) and transit operations for potential impacts. A screenline is an imaginary line across which the number of passing vehicles is counted. On each screenline a (v/c) ratio: the number of vehicles crossing compared to the designated capacity of the roadway, can be measured. Over the next twenty years, traffic volumes are expected to increase throughout the city due to growth that would occur regardless of the proposed alternatives. Three screenlines are expected to exceed their thresholds in the PM peak hour in 2035 in all alternatives:

- South City Limit–Martin Luther King Jr. Way to Rainier Ave S in the southbound direction
- Ship Canal–Ballard Bridge in the northbound direction
- South of S Jackson St–12th Ave S to Lakeside Ave S in the southbound direction

Deficiencies under the No Action alternative are expected for automobile traffic, freight, and transit at those locations. In ~~Action~~ Alternatives 2, and 3, and the Preferred Alternative, due to increased growth assumed, there would be a potentially significant adverse impact to automobile traffic, freight, and transit for these locations.

Mode share, a measure of the percentage of travelers using alternative to Single Occupancy Vehicles (SOV) is expected to decrease (a positive trend), in all alternatives. All ~~of the~~ sectors are expected to meet the 2035 SOV target under the three alternatives.

Pedestrian and Bicycle

The City has identified plans to improve the pedestrian and bicycle network through its Pedestrian Master Plan, Bicycle Master Plan and various subarea planning efforts. These plans are actively being implemented and are expected to continue to be implemented regardless of which land use alternative is selected. However, the prioritization and/or phasing of projects may vary depending on the expected pattern of development. Although Alternatives 2, and 3, and the Preferred Alternative would result in increased numbers of pedestrian and bicycle

trips compared to the no action alternative, capacity constraints on non-motorized facilities are not expected. Therefore, given that the pedestrian and bicycle environment is expected to become more robust regardless of alternative, no significant impacts are expected to the pedestrian and bicycle system under any of the alternatives.

Safety

The City has a goal of zero traffic fatalities and serious injuries by 2030. This goal, and the policies and strategies supporting it, will be pursued regardless of the land use alternative selected. The action alternatives are expected to have roughly two percent more vehicle trips than the no action alternative, which could potentially lead to an increase in the number of citywide collisions. The travel demand model indicates that speeds throughout the network would be slightly lower under the action alternatives, which could have a beneficial effect on safety. The minor magnitude of these safety indicators are not expected to substantively change the level of safety among the future year alternatives. Therefore, no significant impacts are expected under any of the alternatives.

Parking

There are currently some areas of the city where on-street parking demand exceeds parking supply. Given the projected growth in the city and the fact that the supply of on-street parking is unlikely to increase by 2035, a parking deficiency is expected under the no action alternative. With the increase in development expected under Alternatives 2, and 3, and the Preferred Alternative, particularly in urban villages which already tend to have high on-street parking utilization, parking demand will be higher than the no action alternative. Therefore, significant adverse parking impacts are expected under Alternatives 2, and 3, and the Preferred Alternative.

Mitigation Measures

The mitigation measures identified in the Seattle 2035 Comprehensive Plan EIS are applicable to MHA and will mitigate identified significant adverse impacts.

Other Proposed Mitigation Measures

The following additional mitigation measures would address impacts identified that would result from the action alternatives.

- Purchase additional bus service from King County Metro along affected corridors.
- Increase the screenline threshold from 1.0 to 1.2 to acknowledge the City is willing to accept higher congestion levels in certain areas. A screenline threshold of 1.2 is consistent with other higher density areas of the city.
- Continue ongoing monitoring of volumes across the Ballard Bridge and complete a feasibility study of a bridge replacement (or new Ship Canal crossing) with increased non-auto capacity if ongoing traffic monitoring identifies a substantial increase in PM peak hour traffic volumes across the bridge.
- Strengthen TDM requirements for new development to reduce SOV trips, particularly in the Ballard, Crown Hill, and Greenwood, Capitol Hill, First Hill, Central District, and Rainier Valley areas.
- Implement parking maximums that would limit the number of parking spaces which can be built with new development.
- Increase parking taxes/fees.
- Review and revise transit pass provision programs for employees.
- Encourage or require transit pass provision programs for residents.

Significant Unavoidable Adverse Impacts

Travel demand and associated congestion is expected to increase over time regardless of the alternative pursued. With respect to the ~~two~~ three action alternatives studied in this ~~Draft~~ Final EIS, potentially significant adverse impacts are identified for screenline volumes and, significant adverse impacts are identified for on-street parking.

The parking impacts are anticipated to be brought to a less-than-significant level by implementing a range of possible mitigation strategies such as those discussed. Potential mitigation measures for the three screenlines impacted by the action alternatives have been proposed. If one or more of those measures are implemented, it is expected that the impact could be reduced to a less-than-significant level. Therefore, no significant unavoidable impacts to screenlines are expected.

HISTORIC RESOURCES

Major Additions or Revisions in the FEIS

The following substantial additions or revisions were added to Section 3.5 Historic Resources since the Draft EIS was published. Areas of additional analysis respond to comments received from agencies and the public.

- Analysis of the impacts of the Preferred Alternative
- Expanded discussion of the unique history and associated resources in individual neighborhoods
- Expanded discussion of historic resources associated with underrepresented immigrant communities and racial and ethnic minority populations
- Expanded review of the effect of alternatives on unreinforced masonry (URM) buildings
- Additional mitigation measures for impacts to historic resources

Impacts Common to All Alternatives

Redevelopment, demolition, and new construction could occur in the study area under all alternatives; these projects could impact historic resources or result in ground disturbance. However, existing policies and regulations regarding review of historic and cultural resources would not change under any alternative. For development projects that would be subject to SEPA, potential impacts to historic and cultural resources would still be considered during project-level SEPA review. None of the alternatives proposes zoning changes within the boundaries of the eight designated Seattle historic districts or within the seven National Register historic districts that are located within and are abutting the study area. Potential decreases to the historic fabric of a neighborhood are likely to occur if historic buildings are redeveloped or demolished and new buildings are constructed that are not architecturally sympathetic to the existing historic characteristics of a neighborhood. Areas with a higher growth rate have the potential for more redevelopment than areas with lower projected growth rates. Systematic historic resource surveys have been completed for 11 neighborhoods in the study area, which can assist in the identification and protection of historic resources.

All urban villages in the study area likely contain resources associated with marginalized or underrepresented immigrant communities or racial and ethnic minority populations. These associations often contribute to a

resource's historic eligibility. Some urban villages in the study area have a higher likelihood for containing these types of resources, such as 23rd & Union–Jackson and Columbia City. Other areas, like Licton Springs, have associations with the Duwamish people.

Alternative 1 No Action

Under Alternative 1 No Action, redevelopment, demolition, and new construction projects could occur in the study area consistent with growth estimated in the Seattle 2035 Comprehensive Plan. These projects may be exempt from project-level SEPA review.

Alternative 2

Alternative 2 estimates ten urban villages with high housing growth rates, where there could be a greater likelihood of greater impacts to historic resources due to development: 23rd & Union–Jackson, Columbia City, Crown Hill, First Hill–Capitol Hill, Morgan Junction, North Beacon Hill, Northgate, Othello, South Park, and Westwood-Highland Park. Of these, the oldest urban villages are 23rd & Union–Jackson and First Hill–Capitol Hill. These are likely to contain the oldest buildings. Systematic inventories have been conducted for four of the 10 urban villages.

Alternative 3

Alternative 3 includes eight urban villages with high housing growth rates, where greater impacts to historic resources due to development may occur: Admiral, Crown Hill, Eastlake, Fremont, Green Lake, Madison–Miller, Morgan Junction, and Wallingford. Of these, the oldest urban villages are Eastlake and Madison–Miller. These are likely to contain a higher number of older buildings than the others which were incorporated in 1891 or later. Systematic inventories have been conducted for three of the eight urban villages.

Preferred Alternative

The Preferred Alternative identifies seven urban villages with high housing growth rates where greater impacts to historic resources could occur as a result of development: Crown Hill, Eastlake, Fremont, Green Lake, Madison–Miller, Morgan Junction, North Beacon Hill, and Wallingford. Of these, the oldest urban village is Madison–Miller, followed by Fremont, Green Lake, and Wallingford. These older urban villages are likely to contain a higher number of older buildings than the others, which

New to the FEIS

Preferred Alternative is a new section since issuance of the DEIS

were incorporated in 1907 or later. Systematic inventories have been conducted for four of the seven urban villages.

Mitigation Measures

The following proposed and existing mitigation measures would to reduce potential impacts to historic and cultural resources. Several other specific measures are discussed in Section 3.5.3. include:

- Comprehensive Plan policies that promote new development consistent with the historic character of the neighborhood.
- City regulations including the Seattle City Landmark process and archaeological surveys.
- Funding continuation of the City-initiated comprehensive historic survey and inventory work that was begun in 2000.

~~Other mitigation measures that the city could elect to pursue could include:~~

- Funding City-led thematic historic context inventories focused on marginalized or underrepresented immigrant communities and preparing thematic context statements relating to those resources.
- Funding City-initiated proactive landmark nominations for properties and potential historic districts identified in new neighborhood surveys.
- Establishing new historic districts or new conservation districts such as the City's Pike/Pine Conservation District.
- Establishing Transfer of Development Rights (TDR) programs within new conservation districts to provide incentives for property owners to keep existing character structures;
- ~~Requiring any structure over 25 years in age that is subject to demolition, including those undergoing SEPA-exempt development, to be assessed for Landmark eligibility.~~
- Requiring project proponents to nominate buildings for landmark review when demolition of properties more than 50 years old is proposed, regardless of City permitting requirements, by modifying the SEPA exemptions thresholds in the Seattle Municipal Code.

Proposed mitigation measures specific to reducing potential impacts to If seismic retrofitting is required for Unreinforced Masonry (URM) Buildings (URM) include:

- Requiring; adherence to the Secretary of the Interior's Standards for the Treatment of Historic Properties.

- Prioritizing City investments of affordable housing funds, and/or other public capital investments, for retrofitting URM buildings to those properties that meet eligibility requirements for designation as a landmark or for listing in the National Register of Historic Places.

Significant Unavoidable Adverse Impacts

At the programmatic level of this analysis, no significant unavoidable impacts to historic and cultural resources are anticipated under any of the proposed alternatives.

BIOLOGICAL RESOURCES

Major Additions or Revisions in the FEIS

The following substantial additions or revisions were added to Section 3.6 Biological Resources since the Draft EIS was published. Areas of additional analysis respond to comments received from agencies and the public.

- Analysis of the impacts of the Preferred Alternative
- Updates to reflect Executive Order 2017-11: Tree Protection
- Additional mitigation measures for impacts to biological resources

The biological resources addressed in the EIS analysis include environmentally critical areas (ECAs), as defined by SMC 25.09, and the City's urban forest and tree cover.

Major Additions or Revisions in the FEIS

Impacts Common to All Alternatives

MHA would not directly impact any biological resources, but development allowed by the MHA program could affect these resources by affecting decisions to redevelop or expand properties containing trees or ECAs. All anticipated growth has the potential to affect these resources and would be required to comply with the existing regulations for protection of ECAs and trees. Development and redevelopment is expected to occur under all of the alternatives, although at different projected rates. In general, development of any kind has the potential to affect ECAs and tree canopy cover through site disturbance during construction and through land use activities after construction.

Alternative 1 No Action

Under Alternative 1, redevelopment, demolition, and new construction projects could occur in the study area under existing zoning. All existing critical area regulations would continue to govern development in and near ECAs under the current zoning. Changes in tree canopy coverage would still be expected, but under current zoning and tree protection policies, codes, and development standards.

Alternative 2

Growth will occur in all urban villages in varying amounts due to the proposed changes in zoning and urban village boundary expansion, creating potential for impacts to local ECAs and tree canopy during construction and by increased density of urban uses and activities after construction. Under Alternative 2, an additional 142 acres of mapped ECAs would occur within the boundaries of Urban Villages compared to No Action, and could potentially be impacted by development. Based on assumptions in Alternative 2, there is the potential for additional loss of between 5 and 11 acres of tree canopy cover within the study area compared to No Action. However, for every displacement risk and access to opportunity urban village type, there is less than one-half of one percent (<0.5 percent) difference between the existing tree canopy cover and the Alternative 2 scenario. This change is not considered a significant impact.

Alternative 3

Growth will occur in all urban villages in varying amounts due to the proposed changes in zoning and urban village boundary expansion, creating potential for impacts to ECAs and tree canopy during future construction and by increased density of urban uses and activities after construction. Under Alternative 3, an additional 102 acres of mapped ECAs would occur within the boundaries of Urban Villages compared to No Action, and could potentially be impacted by development. Based on assumptions in Alternative 3, there is the potential for additional loss of between 8 and 16 acres of tree canopy cover within the study area compared to No Action. However, for every every displacement risk and access to opportunity urban village type, there is less than one-half of one percent (<0.5 percent) difference between the existing tree canopy cover and the Alternative 3 scenario. This change is not considered a significant impact.

Preferred Alternative

Growth in varying amounts would occur in all urban villages due to the proposed zoning changes and urban village boundary expansion, creating the potential for impacts to ECAs and tree canopy during construction, and from increased density of urban uses and activities after construction. Under the Preferred Alternative, 99 additional acres of mapped ECAs would occur within urban villages compared to Alternative 1 No Action and could potentially be impacted by development. Although the size of the urban village boundary expansions under the Preferred Alternative is significantly greater than Alternative 3, the amount of additional ECAs included is smaller due to specific adjustments made to proposed capacity increases to avoid sites with ECAs.

Based on assumptions in the Preferred Alternative, there is the potential for additional loss of between 6.3 and 12.5 acres of tree canopy cover within the study area compared to Alternative 1 No Action. However, for every displacement risk and access to opportunity urban village type, there is less than one-half of one percent (<0.5 percent) difference between the existing tree canopy cover and the Preferred Alternative scenario. This change is not considered a significant impact.

Mitigation Measures

The continued application of the City's existing policies, review practices and regulations, would help to avoid and minimize the potential for significant adverse impacts to critical areas discussed in this section. For tree canopy, the City is evaluating a range of urban forestry policies and programs in preparation for the 2018 update of the Urban Forest Stewardship Plan (UFSP). ~~Current options the City is exploring include~~ Mitigation measures to reduce impacts include:

- Implement directives of Executive Order 2017-11: Tree Protection
- Improve enforcement of regulations and penalties.
- Improve and/or expand tree protections.
- Expand incentives and development standards to grow trees as development occurs, specifically in single-family and multifamily residential areas.
- Expand and enhance trees on public lands and in the right-of-way.
- Partner with the community to expand trees in low canopy areas to advance environmental justice and racial equity.

New to the FEIS

Preferred Alternative is a new section since issuance of the DEIS

- Preserve and enhance tree groves to maximize environmental benefits.
- Strategically plant and care for trees to mitigate heat island effect and promote greater community resilience.
- Add a new tree planting requirement in the Residential Small Lot zone.
- Modify green factor landscaping scoring system to give greater weight for tree planting and preservation.

Significant Unavoidable Adverse Impacts

No significant unavoidable adverse impacts to ECAs or tree canopy cover have been identified.

OPEN SPACE AND RECREATION

Major Additions or Revisions in the FEIS

The following substantial additions or revisions were added to Section 3.7 Open Space and Recreation since the Draft EIS was published. Areas of additional analysis respond to comments received from agencies and the public.

- Analysis of the impacts of the Preferred Alternative
- Updates to reflect the 2017 Parks and Open Space Plan
- Additional mitigation measures for impacts to open space and recreation

Impacts Common to All Alternatives

No direct impacts to parks and open space in the form of physical disruptions, alteration, or removal of parks land would result from housing and job growth in the study area. Indirect impacts to parks and open space could occur from changes in the distribution, accessibility, use, or availability of parks and open space due to additional population growth. The primary impact to parks and open space under all alternatives would be a decrease in availability, i.e., greater crowding in parks, a need to wait to use facilities, unavailable programs, or a need to travel longer distances to reach an available park facility. The quality or level of services available within parks and open space is another factor in the determination of adequacy of parks and open space, but because measures of quality are difficult to obtain and subjective this analysis focuses on the amount of and walkability to parks and open space lands, and distribution of parks and open space.

~~A Draft~~The 2017 Parks and Open Space Plan was released in May adopted in August 2017. ~~Although the 2017 Plan has not been finalized,~~ it is likely to be adopted in fall 2017, and ~~t~~The analysis for this Seattle MHA FEIS uses the metrics from this plan to identify significant impacts.

Alternative 1 No Action

Parks and open space impacts under Alternative 1 No Action would be the same as those evaluated for the Preferred Alternative in the Seattle 2035 Comprehensive Plan Final EIS (City of Seattle, 2016). Alternative 1 would not meet the 2017 citywide LOS in the year 2035, unless additional acres of park and open space land is acquired, as expected pursuant to the 2017 Draft Parks and Open Space Plan. Gaps in the geographic availability or shortfalls from optimal location, size, or number of parks could remain over the long-term, and the distribution of these gaps in different urban villages is described in Chapter 3.

Alternative 2

Growth under Alternative 2 would have similar types of impacts to the availability of parks and open space as Alternative 1, but to a larger degree due to the potential for more growth. The City would have to add a greater amount of open space during the 20-year period to meet the 2017 citywide LOS. Gaps in geographic availability or shortfalls from optimal location, size, in different urban villages could occur. The impacts would be greatest in urban villages with the largest increases in growth under Alternative 2 compared to Alternative 1, such as Ballard, Northgate, First Hill-Capitol Hill, North Beacon Hill, North Rainier, and Aurora-Licton Springs.

Alternative 3

Growth under Alternative 3 would have similar types of impacts to the availability of parks and open space as Alternative 1, but to a larger degree due to the potential for more growth. The City would have to add a greater amount of open space during the 20-year period to meet the 2017 citywide LOS. Overall there would be similar reductions in park and open space availability to Alternative 2. Gaps in geographic availability or shortfalls from optimal location, size, in different urban villages could occur. Under Alternative 3 there would be less of a decrease in availability in First Hill–Capitol Hill and North Beacon Hill.

New to the FEIS

Preferred Alternative is a new section since issuance of the DEIS

Preferred Alternative

Growth under the Preferred Alternative would have similar types of impacts to the availability of parks and open space as Alternative 1, but to a larger degree due to the potential for more growth. The City would have to add a greater amount of open space during the 20-year period to meet the 2017 citywide LOS. The Preferred Alternative would result in similar overall reductions in park and open space availability as Alternative 3. Gaps could occur in geographic availability or shortfalls from optimal location, size, in different urban villages.

Mitigation Measures

Given greater overall demand for parks and open space in the study area, Seattle Parks & Recreation (SPR) should consider MHA growth projections in the next open space gap analysis to address future potential impacts through the next Development Plan. According to the 2017 LOS, approximately 40 acres of new parks and open space land would be required under Alternative 1, and approximately 434 acres would be required under Alternatives 2, ~~and 3,~~ and the Preferred Alternative. Provision of additional parks and open space land should occur in urban villages ~~with substantial walkability gaps that are~~ underserved and that would see a reduction in park and open space availability.

The mitigation strategies outlined in the Seattle 2035 Comprehensive Plan EIS would provide tools necessary to accomplish the City's parks and open space goals. One of these strategies is to incorporate incentives and other regulatory tools to encourage and enforce developers to set aside publicly accessible usable open space. Examples of specific vehicles to achieve mitigation in this way include impact fees for open space, or a transfer of development rights (TDR) for open space that could be implemented in certain zones or locations. Additional mitigation measures include providing more activities and programs in existing parks and open spaces, increasing the acreage of public spaces through partnerships with other public entities, and improving accessibility to existing parks and open space.

Significant Unavoidable Adverse Impacts

Development under all alternatives would have significant adverse impacts to parks and open space. However, these impacts can be avoided through mitigation as described above.

PUBLIC SERVICES AND UTILITIES

Major Additions or Revisions in the FEIS

The following substantial additions or revisions were added to Section 3.8 Public Services and Utilities since the Draft EIS was published. Areas of additional analysis respond to comments received from agencies and the public.

- Analysis of the impacts of the Preferred Alternative
- Additional analysis of public school capacity constraints in coordination with Seattle Public Schools
- Additional mitigation measures for impacts to public schools

Public services and utilities analyzed in the EIS include: Police Services, Fire and Emergency Medical, Public Schools, Water, Sewer, and Drainage and Electricity.

There would be no direct impacts to public services and utilities from the proposed zoning changes under the MHA program. Indirectly, however, development resulting from implementation of proposed zoning changes would cause substantial population increases in some areas. Population growth generally increases demand for public services, but more compact patterns of growth can also reduce the distances that emergency vehicles need to travel to respond to service calls. Similarly, population growth increases demand on utilities, regardless of density, but higher density can concentrate demand and cause local capacity problems.

Water System, Sewer, and Drainage, Seattle City Light

Future development under any of the alternatives would likely result in greater demands on localized areas of the water supply, sewer system, distribution system, and electric power. However, SPU and ~~SPU~~ SCL have methods in place that ensure development is not endorsed without identification of demand and availability of utilities. Development in areas of informal drainage could have an impact on localized stormwater drainage. All projects must comply with the minimum requirements in the Seattle Stormwater Code (SMC 28.805), even where drainage control review is not required.

The following urban villages, all north of 85th St, are in areas with a large amount of informal drainage.

- Crown Hill
- Aurora–Licton Springs
- Northgate
- Bitter Lake
- Lake City

Of these villages, Bitter Lake and Aurora–Licton Springs also overlap capacity constrained areas, and all of these urban villages have portions served by ditch/culvert systems which are inherently capacity constrained. Crown Hill is the only urban village boundary expansion area of these villages. The expansion area would include blocks north of 85th St with informal drainage.

Police

The South Precinct is currently at capacity; any future growth would result in an impact to the South Precinct. If the planned North Precinct is built, it would provide adequate capacity for future growth. In other precincts, impacts would vary, depending on the distribution of growth under the alternatives. The pattern of growth under Alternatives 2, and 3, and the Preferred Alternative would be denser in some areas, resulting in a greater concentration of people within a precinct that the police department would have to serve.

Fire and Emergency Medical Services

The pattern of growth would result in a greater concentration of people within an area (Battalion) that fire and emergency would have to serve in the Action Alternatives. Existing growth trends in South Lake Union (Fire Station 2) and portions Bitter Lake, Aurora–Licton Springs, Crown Hill, and Greenwood–Phinney Ridge (Fire Station 31) could contribute to increased service call volumes and potential slower average response times in these areas. Implementation of the proposed project under Alternative 2, and 3, and the Preferred Alternative would result in a higher number of housing units that would need fire and emergency services and therefore could result in additional impacts to Fire Station 31. However, the City would continue to manage fire and EMS services in the city as a whole in view of planned housing and employment growth (City of Seattle, 2015).

Public Schools

For SPS, growth is expected to be most evident in northwest Seattle, northeast Seattle, Downtown/South Lake Union and Capitol Hill/Central District. The northwest Seattle, northeast Seattle and Capitol Hill/Central Districts currently have capacity to serve potential growth. The FEIS includes an analysis of school capacity by school service area, including estimates of net students generated from housing growth under the Preferred Alternative. The capacity analysis finds that five of the 12 school service areas (Denny, Eckstein, Eagle Staff, Madison, and Mercer) meet or exceed 90 percent of right size capacity in 2017/18 under existing conditions. The Preferred Alternative is estimated to increase net student enrollment by 77–136 students in those capacity constrained school service areas over the 20-year period, which could exacerbate existing capacity constraints.

SPS would respond to the exceedance of capacity as it has done in the past, by adjusting school boundaries and/or geographic zones, adding/removing portables, adding/renovating buildings, reopening closed buildings or schools, and/or pursuing future capital programs. If the MHA program is adopted, SPS would adjust their enrollment projections accordingly for the next planning cycle. Potential additional mitigation of capacity constraints is discussed in this FEIS.

The rise in enrollment at public schools in urban villages will impact SPS transportation services. Northgate, Crown Hill, Bitter Lake, Lake City, North Beacon Hill, Othello, Rainier Beach, South Park, Greater Duwamish are currently experiencing strain on existing deficient sidewalk infrastructure. As a result, the increased school capacity in these villages would subsequently burden the existing sidewalk infrastructure even further, posing a safety risk to pedestrian students.

Mitigation Measures

Mitigation recommendations proposed in Section 3.8.3 of the Seattle 2035 Comprehensive Plan EIS would also apply to the potential impacts identified for this project, including prioritizing identified needs in areas that currently experience deficiencies and are anticipated to grow in number of residences. No other mitigation would be required.

To address existing and future school capacity constraints, the City and School District can pursue additional mitigation.

- The City could provide assistance to identify and procure sites for new school facilities. This may include exploration of the reuse of existing publicly owned lands for school facilities.
- The City and SPS could investigate ways to strengthen integrated long-term planning efforts, which could include creation of new plans jointly approved by City and School District governing bodies.
- The City could study and develop a recommendation for a schools impact fee on new development to support the funding of public school facilities.

Additional mitigation measures to address stormwater drainage impacts in areas of informal drainage could be considered by the City. The City could strengthen tools and regulations to ensure that systematic stormwater drainage improvements are made at the time of small scale infill developments in areas of informal drainage. Tools could include incorporating drainage design techniques in the low-cost sidewalk improvements section of the Right-of-Way Improvements Manual.

Another potential tool is to establish a latecomer agreement mechanism for sidewalk / drainage improvements. This tool would allow homeowners and builders of small scale development projects to sign an agreement to contribute to future block-scale sidewalk / drainage improvements at the time the City is prepared to construct a block-scale improvement in the area. The tool could be combined with low-cost loan financing assistance from the city.

Significant Unavoidable Adverse Impacts

No significant unavoidable impacts to public services or utilities are anticipated at this time for any alternative. Existing local or statewide regulatory framework would apply at the time of development that would identify any specific project-level impacts and would be addressed on a project-by-project analysis.

AIR QUALITY AND GREENHOUSE GAS EMISSIONS

Major Additions or Revisions in the FEIS

The following substantial additions or revisions were added to Section 3.9 Air Quality and Greenhouse Gas Emissions since the Draft EIS was published. Areas of additional analysis respond to comments received from agencies and the public.

- Analysis of the impacts of the Preferred Alternative
- Additional mitigation measures for air quality impacts

Air Quality

Construction-Related Emissions. Future growth under any alternative would generate construction phase air emissions, such as exhaust emissions from heavy duty construction equipment and trucks, as well as fugitive dust emissions associated with earth-disturbing activities. Given the transient nature of construction-related emissions, construction related emissions associated with all alternatives are identified as a minor adverse air quality impact.

Land Use Compatibility and Public Health Considerations. Future growth could result in more people living near mobile and stationary sources of air toxics and particulate matter PM_{2.5}. Portions of Seattle located within 200 meters of major highways, rail lines that support diesel locomotive operations, and major industrial areas are exposed to relatively high cancer risk values of up to 800 in one million—fourteen urban villages are within this 200 meter buffer. The action alternatives would increase the potential number of people or other “sensitive receptors” (i.e. hospitals, schools, daycare facilities, senior housing) located near these existing sources of harmful air pollutants. To address potential land use compatibility and public health impacts, the City could consider separating residences and other sensitive uses (such as schools) from highway, rail lines, and port facilities by a buffer of 200 meters. Where separation by a buffer is not feasible, consider filtration systems for such uses.

Greenhouse Gas Emissions

Construction-Related Greenhouse Gas Emissions. Greenhouse gas emissions (GHGs) would be emitted during construction activities from demolition and construction equipment, trucks used to haul construction

materials to and from sites, and from vehicle emissions generated during worker travel to and from construction sites. However, because of the combination of regulatory improvements and Climate Plan Actions under way, construction related GHG emissions associated with all three alternatives would be considered a minor adverse air quality impact.

Transportation-related Greenhouse Gas Emissions. Under all alternatives, projected improvements in fuel economy and a cleaner vehicle fleet outweigh the projected increase in vehicle miles traveled. For this reason, all of the alternatives are expected to generate lower GHG emissions than current emissions in 2015 and all would generate roughly the same annual GHG emissions.

Mitigation Measures

Mitigation recommendations proposed in Section 3.2.3 of the Seattle 2035 Comprehensive Plan EIS would also apply to the potential impacts identified for the MHA proposal. In areas within 500 feet of freeways, the Preferred Alternative would apply the minimum zoning capacity increases necessary to implement MHA.

Significant Unavoidable Adverse Impacts

No significant unavoidable impacts to air quality and greenhouse gas emissions are anticipated under any of the proposed alternatives.

1.6 SIGNIFICANT AREAS OF CONTROVERSY AND UNCERTAINTY AND ISSUES TO BE RESOLVED

The primary issues to be resolved are the specific pattern, distribution, and intensity of the development capacity increases that could be adopted in different urban villages, to effectively implement MHA in the study area. The basic approach of the proposed action, providing development capacity increases in order to implement MHA, is somewhat controversial. Aspects of the proposal with the most controversy include:

- The approach to MHA development capacity increases in urban villages of differing displacement risk and access to opportunity.
- The intensity of MHA rezones in areas currently zoned Single Family Residential in existing urban villages.
- The extent of proposed urban village boundary expansions.

1.7 BENEFITS AND DISADVANTAGES OF DELAYING IMPLEMENTATION

Delaying MHA implementation in the study area and reserving action for a future time is possible. However, delay of the proposal would be likely to exacerbate the housing affordability problem. There is currently strong demand for housing, and significant housing development activity in Seattle. Delay of MHA implementation would forego opportunities for development activity to include rent and income restricted housing in the study area.

One possible benefit of implementing the action is to enable additional time for community engagement on proposed development capacity increases. However, substantial community engagement has been conducted already as summarized in Appendix B, and there will be additional opportunities for community engagement ~~through this SEPA process, and~~ at the time of City Council deliberation on the proposal.



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