



CITY OF SEATTLE
Office of Planning & Community Development

CITYWIDE IMPLEMENTATION OF MANDATORY HOUSING AFFORDABILITY (MHA)

Final Environmental Impact Statement

November 9, 2017





HOUSING AFFORDABILITY
AND LIVABILITY AGENDA



CITY OF SEATTLE

Office of Planning & Community Development

for the

City of Seattle Citywide Implementation of Mandatory Housing Affordability (MHA) Final Environmental Impact Statement

Date of Draft EIS Issuance

June 8, 2017

Date Comments were Due on the Draft EIS

August 7, 2017

Date of Draft EIS Open House and Hearing

June 29, 2017

Date of Final EIS Issuance

November 9, 2017



November 9, 2017

Dear Neighbors:

The City of Seattle is pleased to issue the Final Environmental Impact Statement (FEIS) that examines the potential effects of zoning changes necessary to implement Mandatory Housing Affordability (MHA). The area studied includes multifamily residential and commercial zones in Seattle, areas currently zoned Single Family Residential in existing urban villages, and urban village expansion areas that were identified in the Seattle 2035 Comprehensive Plan.

Implementing MHA is one of many actions the City is proposing to address housing affordability. In 2015 and 2016, the City Council unanimously adopted ordinances that established the framework for MHA. Subsequently, the Council passed legislation adopting zoning changes necessary to implement MHA in several neighborhoods: Downtown/South Lake Union, the University District, Chinatown/International District, along 23rd Ave in the Central Area, and Uptown.

MHA helps ensure that as Seattle grows, development supports housing affordability. Through MHA, all new development must either provide affordable housing on-site or pay into a Seattle Office of Housing fund to support the creation and preservation of affordable housing throughout the city.

On June 8, 2017, a Draft EIS was published that evaluated two action alternatives for implementing MHA with differing distributions and patterns of zoning changes, as well as a no action alternative that would not implement MHA. The public comment period for the Draft EIS included a public hearing on June 29, and the comment period was extended from 45 days to 60 days, to August 7.

Based on the Draft EIS comments, 200 community meetings, 10 public open houses, three telephone town halls, and extensive online engagement with city residents over more than two years, the City developed a Preferred Alternative that is described in this Final EIS. The Final EIS also includes additional analysis of potential impacts in response to comments, in particular, an expanded review of potential displacement impacts using a racial and social equity lens, and increased analysis of public schools in coordination with Seattle Public Schools.

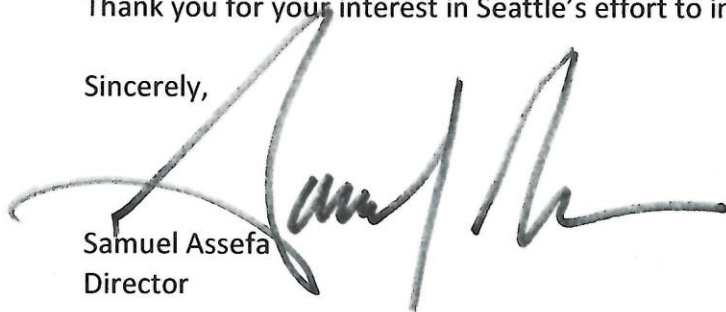
The Preferred Alternative is generally within the range of Draft EIS Alternatives, in terms of amounts of affordable housing that would be generated, as well as growth and development capacity. The Preferred Alternative builds on the Growth and Equity Analysis that was adopted as part of the Seattle 2035 Comprehensive Plan. The Preferred Alternative increases housing and affordable housing options in urban villages with high opportunity. It also moderates

development capacity increases in urban villages with high displacement risk as an effort to curb potential displacement pressure, especially cultural displacement of racial or ethnic minorities. Compared to the action alternatives in the Draft EIS, the Preferred Alternative places increased emphasis on locating more jobs and housing near frequent transit nodes, and it limits development capacity increases in areas with environmental constraints.

The Final EIS identifies environmental impacts and mitigation measures for each alternative. The Final EIS completes the Draft EIS and both should be considered together. The City Council will consider this Final EIS together with input gained through a robust community engagement process during evaluation of the MHA legislation in 2018.

Thank you for your interest in Seattle's effort to implement Mandatory Housing Affordability.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Samuel Assefa', is written over the printed name and title.

Samuel Assefa
Director



FACT SHEET.

PROJECT TITLE

City of Seattle Mandatory Housing Affordability (MHA)

PROPOSED ACTION AND ALTERNATIVES

The proposal addressed in this Final Environmental Impact Statement (FEIS) is to implement Mandatory Housing Affordability (MHA) requirements for multifamily residential and commercial development in certain areas of Seattle. Implementing MHA is one of many actions the City proposes to address housing affordability. To put MHA in 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 and policies in the Neighborhood Plans section of the Comprehensive Plan, concerning single family zoning in urban villages.

The Final EIS evaluates alternative approaches to implementing MHA. Alternative 1 No Action assumes that MHA would not be implemented in the study area, development capacity increases or area-wide rezones would not be adopted, and urban village boundaries would not be expanded.

The three action alternatives (Alternatives 2, 3 and the Preferred Alternative) would allow for additional development capacity, which may lead to additional household or job growth compared to the growth that would otherwise occur. The total amounts of growth and MHA income restricted affordable housing projected to occur by 2035 is similar among the action alternatives. However, the action alternatives differ in the intensity and location of development capacity increases and the patterns and amounts of housing and job growth that could result across the city. The size of urban village boundary expansions for different urban villages also varies between the action alternatives.

The Preferred Alternative considered in the Final EIS is a new alternative. It combines elements of Alternatives 2 and 3, which were studied in the Draft EIS. The Preferred Alternative incorporates input from comments on the Draft EIS and other community engagement, and generally falls within the range of Alternatives 2 and 3, in terms of amounts of affordable housing that would be generated, as well as growth and development capacity.

LOCATION

The proposal would be implemented in specific zoning classifications in the study area, which comprises the City of Seattle with the exception of the Downtown, South Lake Union, and Uptown Urban Centers or the portion of University Community Urban Center addressed in the University District Urban Design Framework. Proposed area-wide rezones are primarily concentrated within designated urban villages. Zoning classifications affected by the proposal would include existing multifamily and commercial zones in Seattle, areas currently zoned Single Family in existing urban villages, and areas zoned Single Family in potential urban village expansion areas identified in the Seattle 2035 Comprehensive Planning process.

PROPONENT

City of Seattle

LEAD AGENCY

City of Seattle Office of Planning and Community Development

RESPONSIBLE SEPA OFFICIAL

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REQUIRED APPROVALS

After considering the EIS alternatives and holding public hearings, the City Council will take action to implement MHA in the study area, which will include amendments to the official zoning map, and amendments to the text of the Land Use Code and limited changes to maps and policies of the 2035 Comprehensive Plan.

DATE OF IMPLEMENTATION

Second Quarter 2018

PHASED REVIEW / ADOPTION OF EXISTING ENVIRONMENTAL DOCUMENTS

The City is following a course of phased environmental review, pursuant to WAC 197-11-060(5) and SMV 25.05.060.E, to review proposals implementing or related to the 2035 Comprehensive Plan. MHA is a regulatory program that would implement the Comprehensive Plan, and this EIS is a step in the course of phased review. The existing EIS that was prepared by the City for the Seattle 2035 Comprehensive Plan (Draft EIS, 2015, Final EIS, 2016) is relevant to the present proposal and is being adopted and used to help meet environmental review requirements, pursuant to WAC 197-11-600 and SMC 25.05.600.

TYPE AND TIMING OF SUBSEQUENT ENVIRONMENTAL REVIEW

Publication of the Final EIS completes the environmental review process for MHA implementation in the study area, unless the City Council considers substantial changes which are outside the range of alternatives previously considered. Future development projects that are proposed that comply with MHA will undertake site-specific environmental review, subject to any SEPA thresholds established by City regulations.

PRINCIPAL EIS AUTHORS AND PRINCIPAL CONTRIBUTORS

This Final EIS has been prepared under the direction of the City of Seattle Office of Planning and Community Development. The following consulting firms provided research and analysis associated with this EIS:

- **3 Square Blocks LLP:** lead EIS consultant
- **BERK:** environmental analysis of housing and socioeconomics, land use, and aesthetics and document design
- **Fehr & Peers:** environmental analysis of transportation, circulation, and parking
- **ESA:** environmental analysis of historic resources, biological resources, parks and open space, public services and utilities, and air quality and greenhouse gas emissions
- **Weinman Consulting LLC:** review and advise on the description of the proposal, alternatives, and SEPA compliance and strategy

DATE OF DRAFT ENVIRONMENTAL IMPACT STATEMENT ISSUANCE

June 8, 2017

CLOSE OF DRAFT EIS COMMENT PERIOD

August 7, 2017

DATE AND LOCATION OF DRAFT EIS OPEN HOUSE AND HEARING

June 29, 2017

Time: Open House, 5:30 pm | Hearing, 6:30 pm
Location: Seattle City Hall Bertha Night Landes Room
600 4th Avenue, Floor 1
Seattle, WA 98124-7088

DATE OF FINAL EIS ISSUANCE

November 9, 2017

LOCATION OF BACKGROUND DATA

City of Seattle Office of Planning and Community Development
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206.684.3586

FINAL EIS AVAILABILITY AND PURCHASE PRICE

Copies of this Final EIS have been distributed to agencies, organizations, and individuals as established in SMC 25.05. Notice of Availability of the Final EIS has been provided to organizations and individuals that requested to become parties of record.

The Final EIS can be reviewed at the following public libraries:

- Seattle Public Library—Central Library (1000 4th Avenue)
- Seattle Public Library, Northeast Branch (6801 35th Avenue NE)
- Seattle Public Library, Ballard Branch (5614 22nd Avenue NW)
- Seattle Public Library, High Point Branch (3411 SW Raymond St)
- Seattle Public Library, Capitol Hill Branch (425 Harvard Avenue E)
- Seattle Public Library, Columbia City Branch (4721 Rainier Avenue S)

A limited number of complimentary copies of this Final EIS are available—while the supply lasts—as an electronic CD from the Seattle Department of Construction and Inspections Public Resource Center, located in Suite 2000, 700 5th Avenue, in downtown Seattle. Additional copies may be purchased at the Public Resource Center for the cost of reproduction.

This Final EIS and the appendices are also available online at: <http://tinyurl.com/HALA-MHA-EIS>



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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.

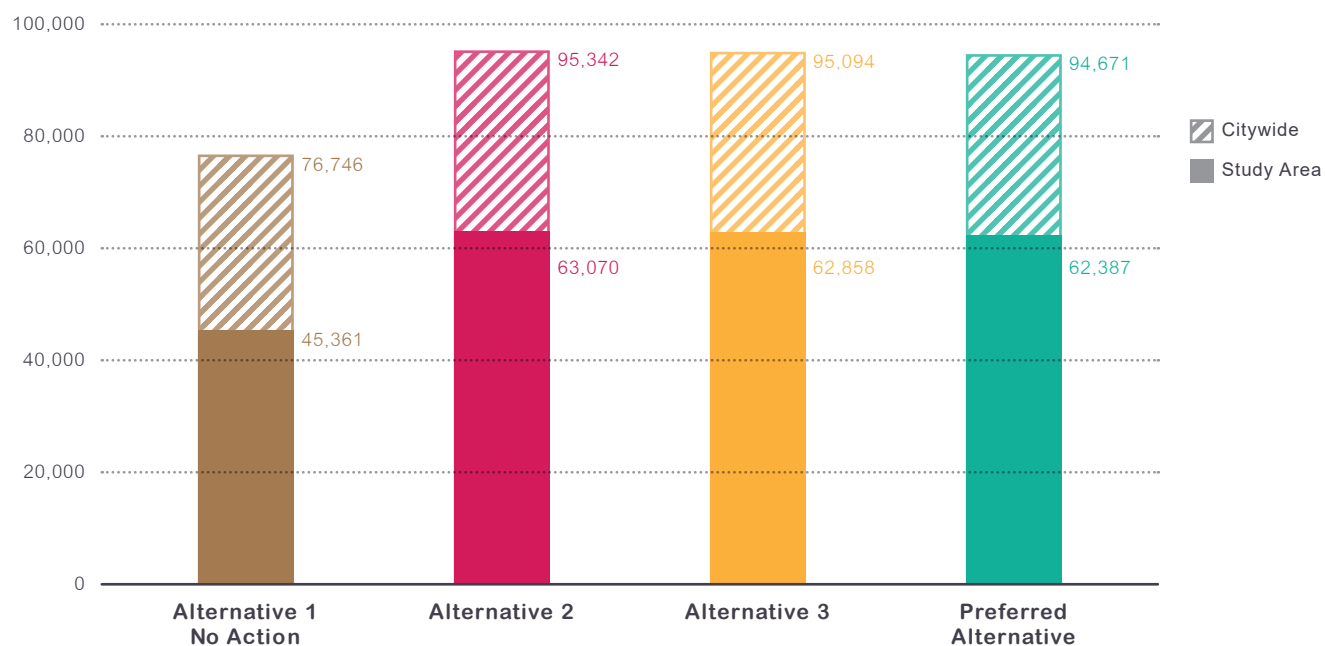


Exhibit 1-2 Total Household Growth, 20 Years

Source: City of Seattle, 2017.

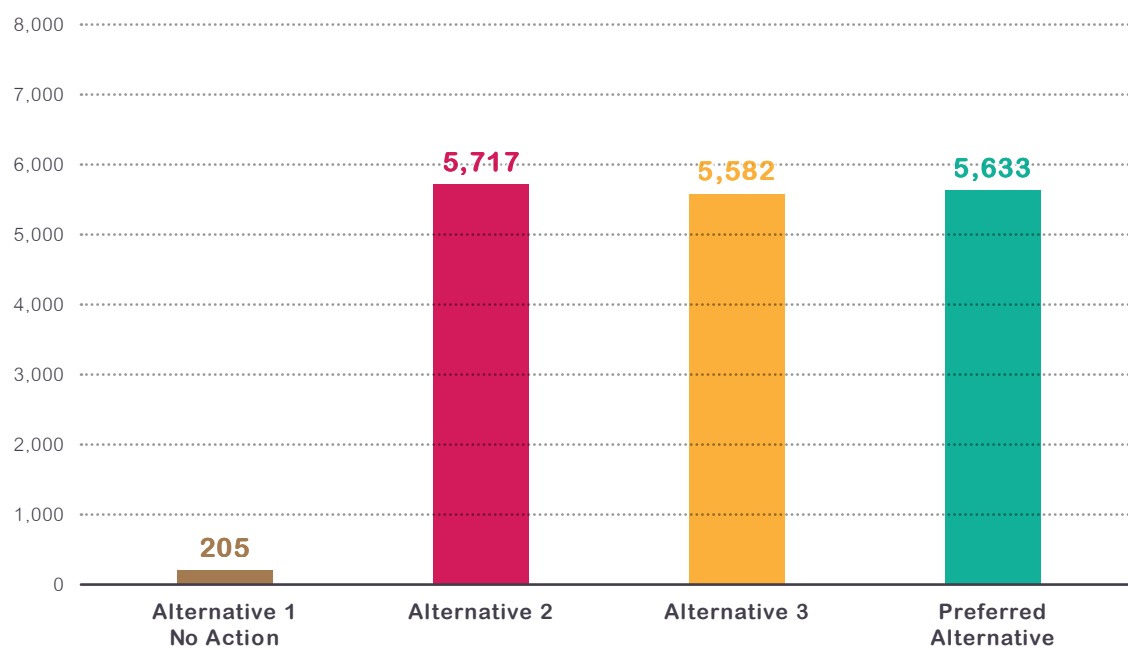


Exhibit 1-3 Income-Restricted Affordable Housing Units Generated from Study Area, 20 Years

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.

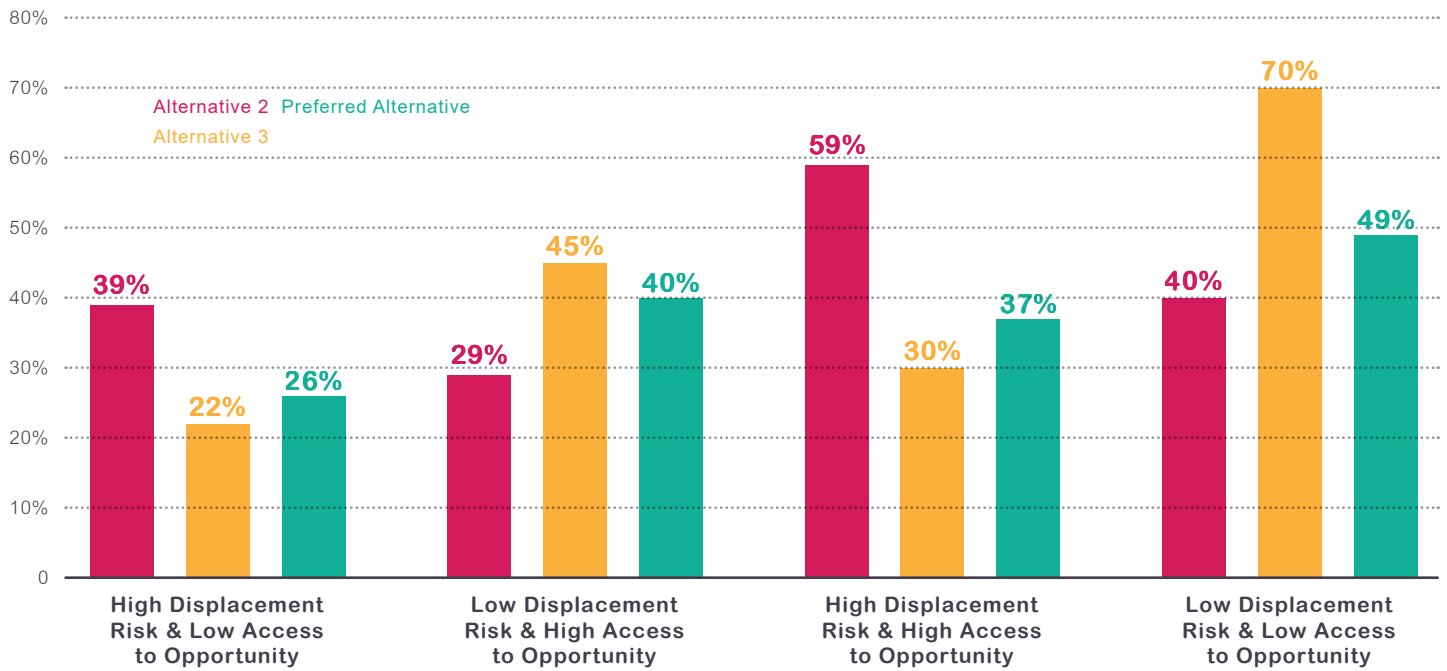


Exhibit 1-7 Percentage Increase in Housing Compared to Alternative 1 No Action

Source: City of Seattle, 2017.

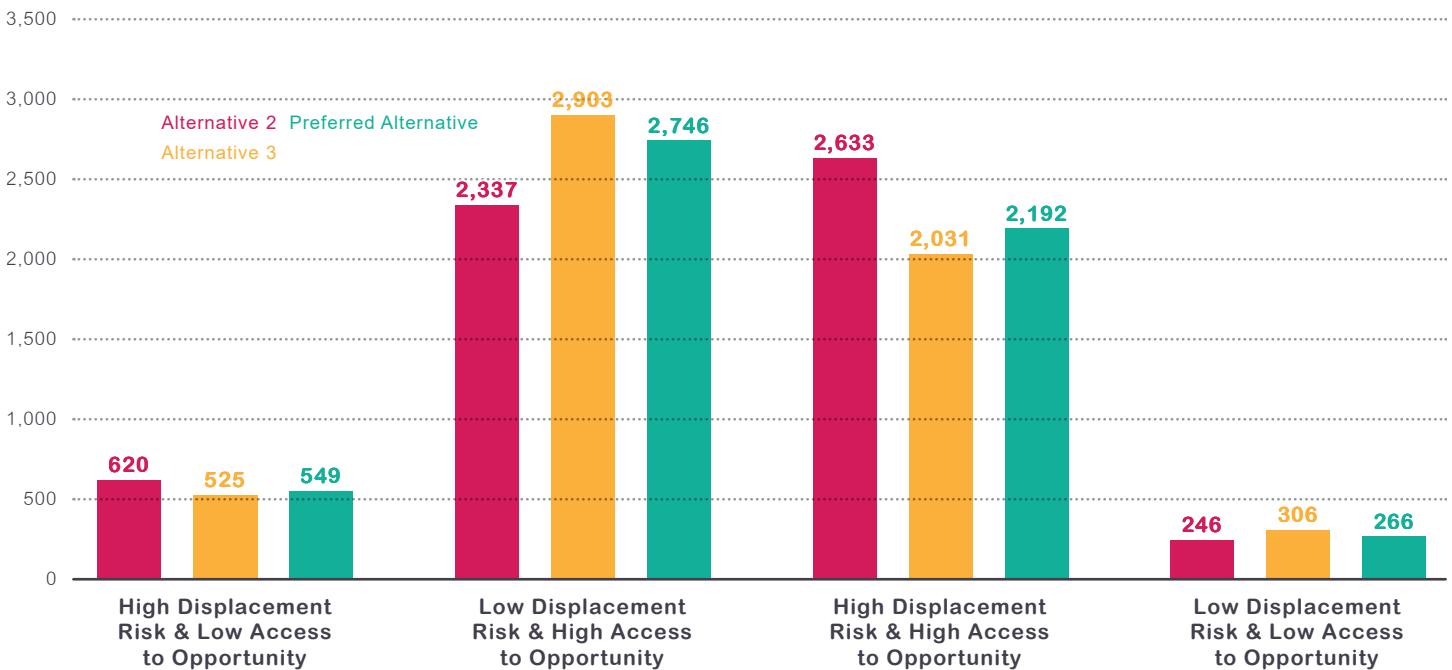


Exhibit 1-8 Income-Restricted Affordable Units Built

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 TRA0 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 23, Alternative 32 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.

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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.

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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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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.

2

**ALTERNATIVES.****2.1 INTRODUCTION****PROPOSED ACTION OVERVIEW**

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 is greatest for households with lower incomes who are not adequately served by the current housing market. 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 in Seattle has increased 35 percent over the last five years and is unaffordable by conventional measures to a worker earning a \$15 minimum wage. The lack of affordable housing has disproportionate impacts on 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 Environmental Impact Statement (FEIS) is to implement a Mandatory Housing Affordability (MHA) requirement for multifamily residential and commercial development in certain areas of the city.

This chapter of the FEIS contains the description of the proposal and alternatives as found in the Draft EIS (DEIS), plus updates and new information describing the Preferred Alternative. 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, or a note in the margin where there is a new section or exhibit.

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 development meeting certain thresholds either to build affordable housing on-site or to make a payment to support the development of rent- and income-restricted housing.
- 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) in locations near high-frequency transit, as studied in the Seattle 2035 Comprehensive Plan.
- Modify certain rezone criteria in the Land Use Code and policies in the Neighborhood Plans section of the Comprehensive Plan, concerning single family zoning in urban villages.

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~~ 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 the City of Seattle, areas currently zoned Single Family Residential in existing urban villages, and areas zoned Single Family 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 processes ~~has~~ have implemented or will implement increases in development capacity and MHA requirements and have performed ~~with its own~~ separate and independent SEPA review~~analysis~~. The study area also excludes the portion of University Community Urban Center addressed in the University District Urban Design Framework and EIS. Exhibit 2-1 shows a ~~A~~ map of the study area ~~is below in Exhibit 2-4~~.

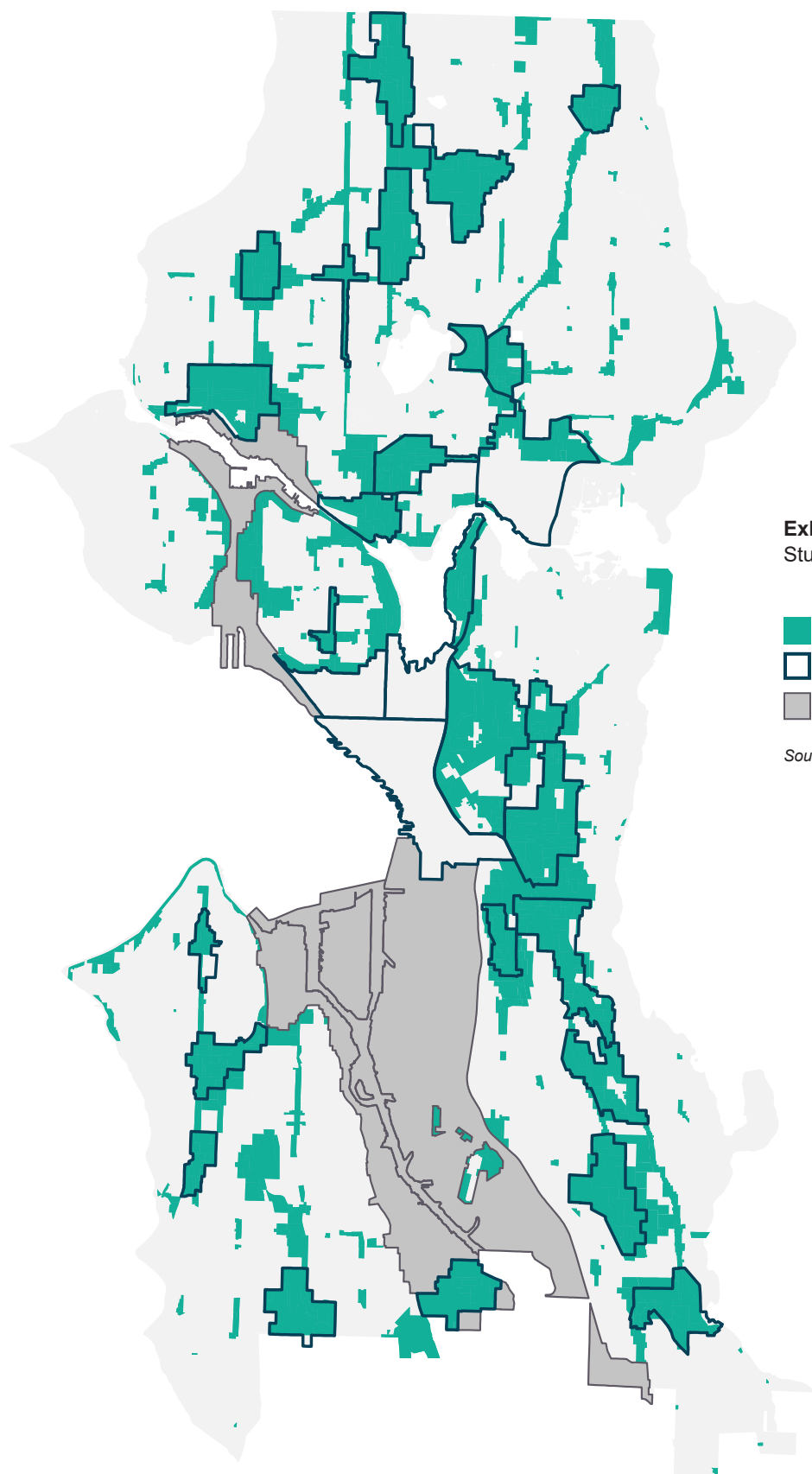


Exhibit 2-1
Study Area

- EIS Study Area
- Urban Village
- Manufacturing & Industrial Center

Source: City of Seattle, 2017.

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 percent of the area median income (AMI) in the study area over a 20-year period.
- Distribute the benefits and burdens of growth equitably.

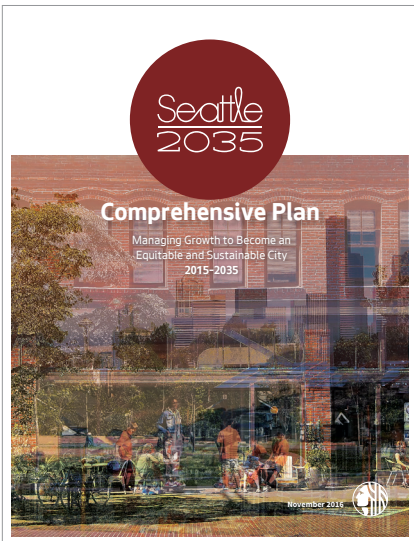
2.2 PLANNING CONTEXT

SEATTLE 2035 COMPREHENSIVE PLAN AND EIS

The Washington State Growth Management Act (GMA) requires local jurisdictions to adopt and periodically update Comprehensive Plans that plan for the amount of population and employment growth allocated to the jurisdiction by the Washington State Office of Financial Management (OFM). Seattle's Comprehensive Plan, *Seattle 2035*, is a 20-year vision and roadmap for the city's future. Its framework of goals and policies addresses most of Seattle's big-picture decisions on how to grow while preserving and improving quality of life in the city.

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 found a significant unavoidable adverse impact in the area of housing, stating that Seattle would continue to face a housing affordability challenge under all of the alternatives studied. Proposed MHA as evaluated in this EIS, is one action the city is studying to partially mitigate the housing affordability challenge.

The alternatives considered in the Seattle 2035 EIS encompassed alternative approaches to managing future growth patterns within the framework of the Comprehensive Plan's urban village strategy. The



EIS studied potential impacts of four different growth strategies: a no action alternative that anticipated a continuation of growth in a distribution pattern resembling the last 20 years; and three action alternatives that represented a range of possible growth distributions, each emphasizing a different pattern of growth that could lead to different implementing actions. Each action alternative and the preferred alternative identified in the Final EIS anticipated growth of 70,000 housing units and 115,000 jobs in Seattle through 2035, the growth target allocated by the King County Countywide Planning Policies and the minimum that Seattle must plan to accommodate.

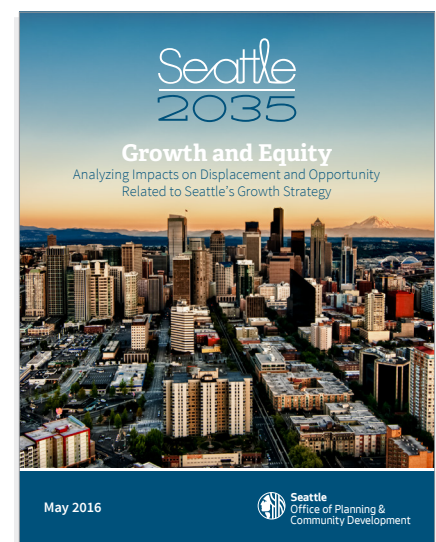
The Seattle 2035 Final EIS also included a sensitivity analysis that analyzed the impacts of a hypothetical increase of residential growth greater than beyond the growth assumptions of the preferred alternative and the City's adopted growth planning estimate. The sensitivity analysis evaluated household growth of 100,000 through the year 2035.

The Seattle 2035 Comprehensive Plan and EIS provide key context for the MHA proposed action, and this EIS builds on the prior analysis. For consistency, 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 is consistent with the quantity and location of households and jobs anticipated in the adopted Seattle 2035 Comprehensive Plan. The environmental analysis of the No Action alternative in this MHA EIS, therefore, closely parallels the analysis of the preferred alternative of the Seattle 2035 Comprehensive Plan Final EIS. Similarly, the sensitivity analysis from the Seattle 2035 Final EIS, which hypothesized additional growth above the adopted estimates, provides a basis for assumptions in this MHA EIS that identify additional housing and jobs beyond the adopted growth estimate.

GROWTH AND EQUITY ANALYSIS

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 Growth and Equity Analysis examined demographic, economic, and physical factors to evaluate the risk of displacement and access to opportunity for marginalized populations across Seattle neighborhoods.

In September 2016, the City Council passed Resolution 31711, renewing the emphasis on race and social equity in the Comprehensive Plan update and other City actions. The resolution called for reducing racial and social disparities through the City's capital and program investments, achieving



equity through growth, and conducting equity analyses when taking policy actions. The MHA EIS seeks to achieve these goals by integrating aspects of the Growth and Equity Analysis directly into the formation and environmental analysis of the alternatives studied. Since it is integral to the analysis in this EIS, a discussion of the Growth and Equity Analysis follows. In addition, Chapter 3 of this EIS includes additional analysis of social equity issues, which are a response to comments received during review of the Draft EIS.

Growth and Equity Analysis Background

The *Growth and Equity Analysis* considered both people and places. It combined a traditional EIS approach of analyzing potential impacts and identifying mitigation with the City's Race and Social Justice Initiative (RSJI). 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. 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.

Displacement Risk

The Displacement Risk Index combines data about demographics, economic conditions, and the built environment into a composite index of displacement risk. It focuses on displacement that affects marginalized

populations, defined in Seattle 2035 as people of color, low-income people, English-language learners, and people with disabilities. It reflects data on vulnerability, amenities, development capacity, and rent to identify where displacement of those populations is more likely to occur.

The vulnerability indicators identify populations less able to withstand housing cost increases and more likely to experience discrimination or other structural barriers to finding new housing. The amenity indicators are factors like access to transit and proximity to certain core businesses that contribute to housing demand. Development capacity is a parcel-level measure of how much development could theoretically occur under current zoning over an indefinite time. Median rent data shows how the cost of housing varies geographically.

Access to Opportunity

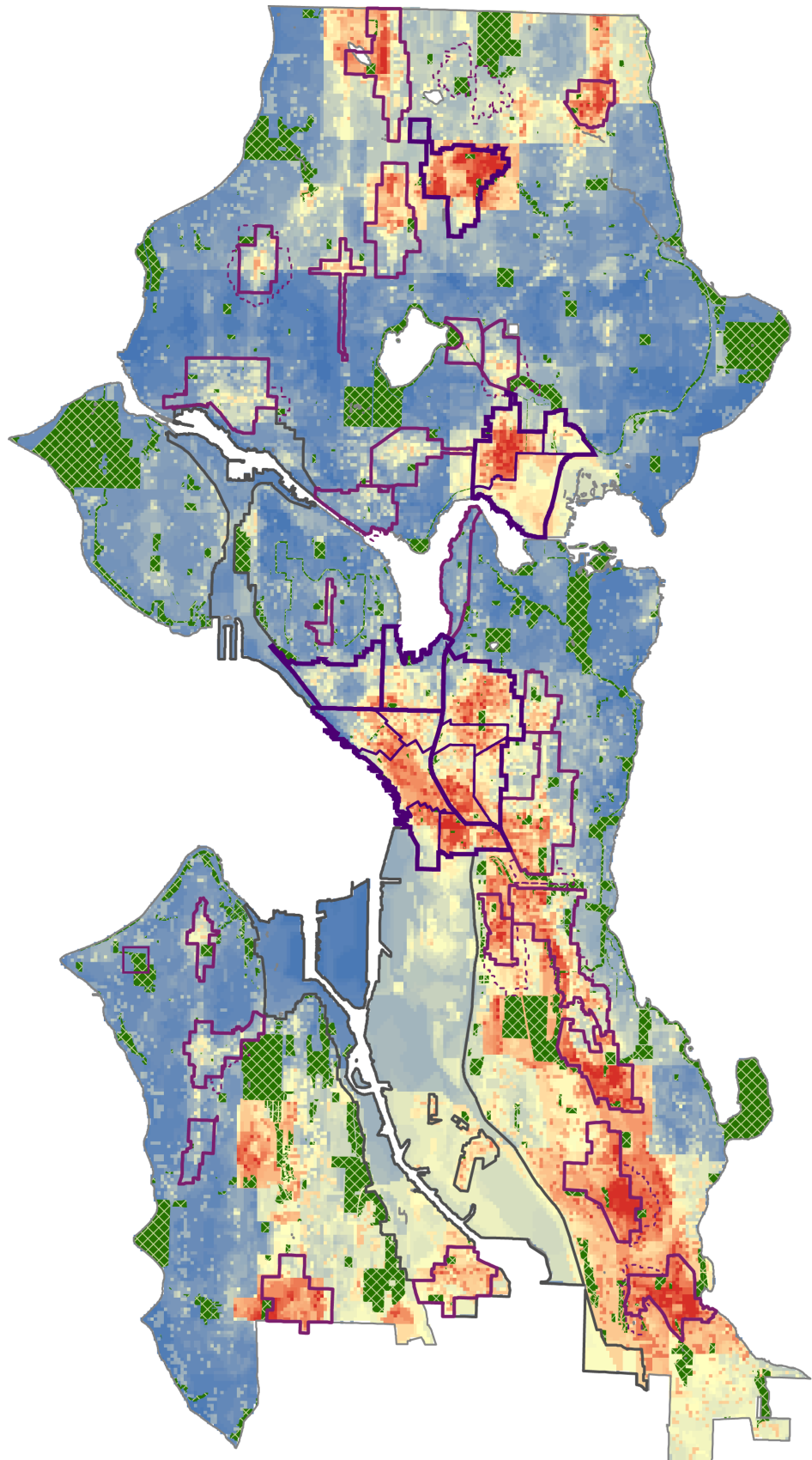
The Access to Opportunity Index identifies disparities in access to key determinants of social, economic, and physical well-being. It includes measures related to education, economic opportunity, transit, public services, and public health. Some of the access to opportunity indicators are also factors that increase the potential for displacement, such as proximity to transit and job centers.

Exhibit 2–2 shows areas of the city according to their level of displacement risk, and Exhibit 2–3 shows areas of the city according to their level of access to opportunity. For a complete list of the data used in the Displacement Risk and Access to Opportunity Indices, refer to Appendix A.

Exhibit 2-2
Displacement Risk Index



Source: City of Seattle, 2017.



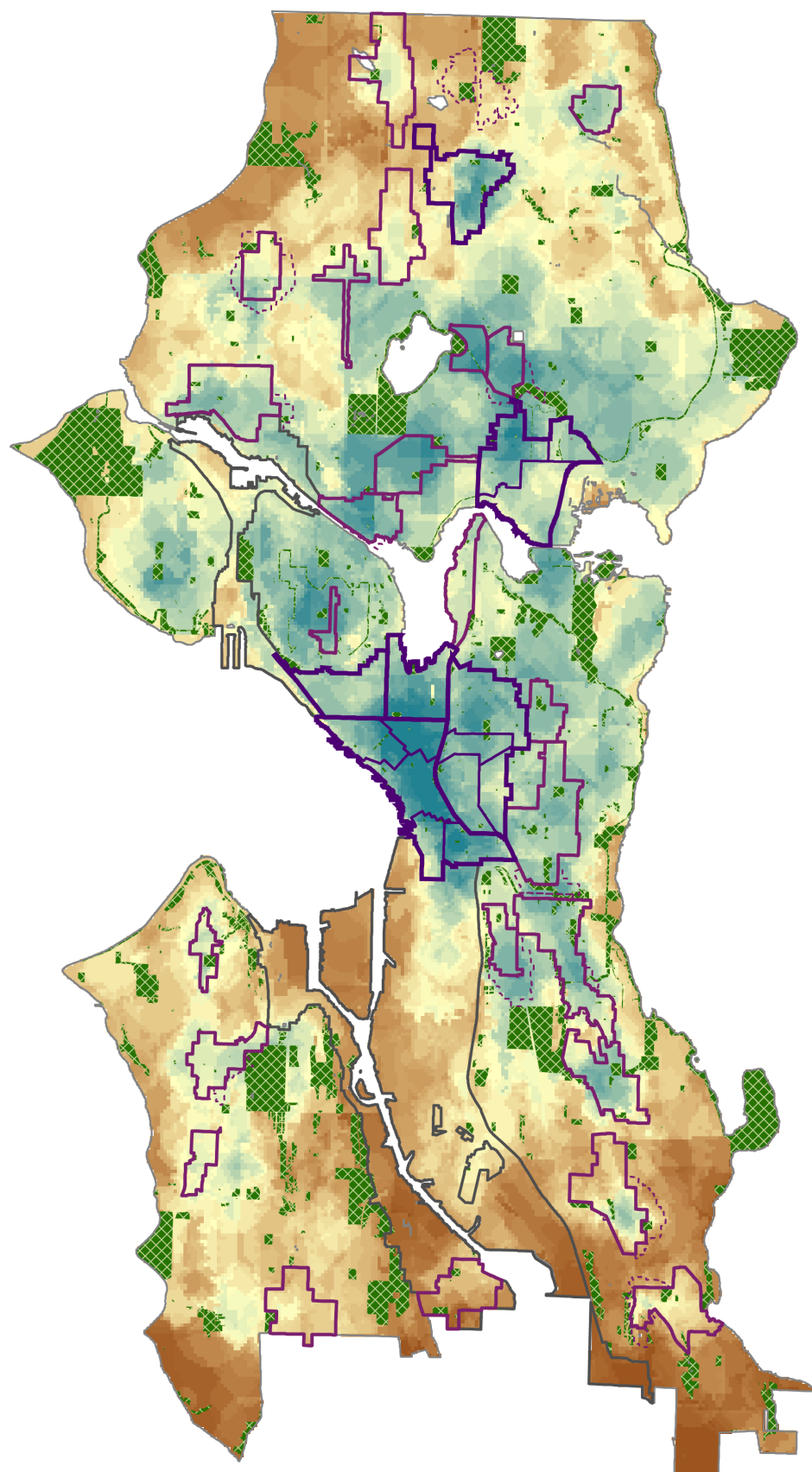


Exhibit 2-3
Access to Opportunity Index



Source: City of Seattle, 2017.

Displacement Risk and Access to Opportunity Typology

Together, these indices characterize whether an urban village has relatively high or low displacement risk and high or low access to opportunity. Viewed as a matrix, the indices create a typology of urban villages according to their relative levels of displacement risk and access to opportunity. As shown in Exhibit 2–4, the Growth and Equity Analysis identifies four categories of urban villages. The categories help identify the potential impacts of future growth and suggest which mitigation measures could address needs and opportunities in different urban villages. The EIS action alternatives (Alternative 2 and Alternative 3) reference this displacement risk and access to opportunity typology.

Exhibit 2–4 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.

High Displacement Risk / Low Access to Opportunity

Many of these neighborhoods are transitioning to higher levels of desirability. But some still do not have all the amenities and services found elsewhere in the city. Urban villages in this category are often adjacent to neighborhoods that have already experienced physical and demographic change and will have high potential for displacement as investment and amenities come online in the area.

Low Displacement Risk / High Access to Opportunity

Neighborhoods with low risk of displacement and high access to opportunity are desirable and generally have fewer marginalized

populations. These neighborhoods generally already offer good access to economic and educational opportunities. Accordingly, market-rate housing in these neighborhoods tends to be unaffordable to lower-income households. With relatively few marginalized populations, these areas may also lack the cultural services and community organizations geared to those populations. An equitable approach for these neighborhoods would expand pathways into the neighborhood for people who currently cannot afford to live, work, or operate a business there.

High Displacement Risk / High Access to Opportunity

Neighborhoods with high risk of displacement and high access to opportunity are often highly desirable because of the amenities they contain and the relatively lower cost of housing. The desirability of these neighborhoods attracts new development that could displace marginalized populations in these places. An equitable development strategy for these neighborhoods is to stabilize existing marginalized populations while also providing opportunities for economic mobility.

Low Displacement Risk / Low Access to Opportunity

Only a few urban villages fall in this category. These areas could absorb additional growth with minimal displacement risk, but access to opportunity in these places is also limited.

The Growth and Equity Analysis's identification of potential effects on displacement can be used both to measure impacts on marginalized populations and as a policy variable to help shape the how the City implements MHA in different types of neighborhoods.

Housing Affordability and Livability Agenda

In September 2014, Mayor Murray and the City Council gathered Seattle leaders to help develop an agenda for increasing the affordability and availability of housing. The City convened a Housing Affordability and Livability Agenda (HALA) Advisory Committee composed of renters and homeowners, for-profit and non-profit developers, and other local housing experts. After months of deliberation, the committee reached consensus and published a report with 65 recommendations to consider. The HALA recommendations include a goal of creating 50,000 new homes over the next decade, including 20,000 new homes for low- and moderate-income people. The goal of 20,000 new homes for low- and moderate-income people would roughly triple the historical annual rate of production of rent- and income-restricted homes.



Following release of the HALA Advisory Committee recommendations, Mayor Murray and the City Council directed City departments to implement many of the recommendations. In October 2015, the Council passed Resolution 31622, declaring their intent to consider many of the HALA recommendations and requesting the State legislature to adopt or modify policies to support affordable housing production and preservation. The resolution established a two-year work plan for community engagement and policy analysis to inform possible Council action on specific implementation actions to address housing affordability and livability.

MHA is one of the 65 recommended HALA implementation actions. As of this writing, MHA has been implemented or is being considered in several geographic sub-areas separate from this proposal. MHA is in effect in portions of the University District that received zoning capacity increases in February 2016 through the City Council's adoption of Ordinance 125267. MHA is also effective in Downtown and South Lake Union (excluding Chinatown–International District) following Council adoption of Ordinance 125291. The Council will likely consider MHA implementation for the Uptown Urban Center in the second quarter of 2017. As identified previously, legislation for each of these sub-areas included its own independent SEPA review.

Other Affordable Housing Funding Sources

Numerous other affordable housing funding sources besides MHA are relevant to this analysis because they can be combined with the MHA payments received by the City to fund new or preserve affordable housing. Federal Low Income Housing Tax Credits (LIHTC) and tax exempt bonds are two critical fund sources expected to be leveraged by MHA funds to produce affordable housing. Annually, the Seattle Office of Housing (OH) makes funding awards on a competitive basis to affordable housing providers who build and preserve affordable housing.

Availability of LIHTC and tax exempt bonds inform assumptions used in the growth estimates in this EIS about the rate at which MHA payment funds received could be converted to affordable homes. MHA payment funds received are assumed to convert to affordable housing at \$80,000 per unit. The actual per-unit physical cost of housing production is likely two to three times higher than this, but the likelihood of combination of MHA funds with the other noted funding sources supports the higher conversion rate.

PUBLIC OUTREACH

The City's public outreach effort for the proposed MHA intends to build awareness of the proposal, identify issues that people are concerned about, and collect feedback on zoning changes and other elements of MHA implementation. The City's engagement has used numerous formats, spanned the entire city, and included both in-person and online engagement. Appendix B includes a draft *Summary of Community Input* that documents this range of engagement and summarizes the themes of community input received. Engagement formats have included:

- Large citywide open house events held at community locations including City Hall, the Museum of History and Industry (MOHAI), public schools, restaurants, and community centers.
- Neighborhood meetings of local community organizations and groups. City staff attended groups' regular meetings to respond to questions and receive individual community input about local areas.
- Consider.it online dialogue. In May 2016, the City posted draft principles about MHA implementation online at HALA.Consider.it, an interactive dialogue and public comment platform. In October 2016, Consider.it hosted draft MHA Implementation maps for all urban villages to create an online dialogue.
- Other digital media. The City gathered input through multiple types of media, including an online HALA-branded website, a project-specific email address (halainfo@seattle.gov), a Facebook Live event, three telephone town halls, and an online newsletter.
- HALA Hotline. Since October 2016, the City has maintained a HALA call-in hotline that residents and stakeholders could use to speak with City staff, receive information about MHA, and provide comment.
- Community Focus Groups consisting of four to six representatives from each urban village and adjacent neighborhood area. The groups met for one year as a sounding board to give focused feedback, particularly on how the MHA program would apply in neighborhood areas.
- Organized in 14 neighborhoods in partnership with the City Council, Community Urban Design Workshops gave communities the opportunity for input on draft MHA zoning maps in a setting and location specific to their neighborhood.

Public input informed the MHA Implementation Principles that contributed to the specific zoning map changes considered in the Action Alternatives. (MHA Implementation Principles are in Appendix C). The comments received also identified areas of concern about potential impacts of the proposal and potential mitigation measures.



Environmental Impact Statement Scoping

The City issued a combined Determination of Significance (DS) and scoping notice on July 28, 2016, requesting public comment on the topics and alternatives to be addressed in the DEIS. The public comment period extended through September 9, 2016. The City solicited scoping comments in written and electronic form. This period included two opportunities for in-person EIS scoping comments held on August 13 at the Rainier Valley Summer Parkways event and August 27 at the Ballard Summer Parkways event. At the in-person events staff were available to describe the EIS process, including proposed topics for analysis, and to ask for comments on issues that should be considered. Appendix D provides the scoping report issued on November 9, 2016, that summarized comments received. This input resulted in several additions to the scope of the EIS analysis, including analysis of greater amounts of estimated growth in the action alternatives, more detailed analysis of potential impacts to tree canopy, and a deeper study of potential displacement.

Draft Environmental Impact Statement

On June 8, 2017, the Draft EIS was issued, with an initial 45-day comment period. A Draft EIS open house and public hearing was held on June 29. In response to a large number of requests for an extended comment period, the comment period was extended 15 more days to August 7. A large volume of DEIS comments were received and are included with responses in Chapter 4 Comments and Responses. The City used comments on the DEIS to help shape the Preferred Alternative in the FEIS. Frequent comments and themes informed additional analysis that is included in several sections of Chapter 3 of the FEIS.

2.3 PROPOSED ACTION AND ALTERNATIVES

The ~~Draft Final~~ EIS evaluates three alternatives that were included in the Draft EIS and an additional Preferred Alternative. The Preferred Alternative is a modified MHA proposal that combines elements of the Action Alternatives considered in the Draft EIS. Changes to the MHA program reflected in the Preferred Alternative respond to the analysis contained in the Draft EIS and to comments received on that document during the comment period. ~~None is formally proposed or preferred at this time.~~ The City is using the SEPA process to test and construct a program that will ultimately be proposed, in a form similar to the Preferred Alternative, for action by the City Council. Further refinement of the MHA program may occur during the legislative process; additional opportunities for public comment will be provided during the City Council's review process. ~~Modified alternatives and/or a preferred alternative may be identified in the Final EIS.~~

The Final EIS considers four alternatives. Alternative 1 No Action assumes that MHA is not implemented in the study area; no development capacity increases or area-wide rezones would be adopted. Alternatives 2, and 3, and the Preferred Alternative both all assume implementation of MHA to achieve the objective of at least 6,200 affordable housing units built in the study area by the year 2035.

Alternatives 2, and 3, and the Preferred Alternative differ in the intensity and location of development capacity increases and the patterns and amounts of housing growth across the city that could result. Exhibit 2–5 summarizes overall citywide household growth and the MHA rent- and income-restricted housing generated from growth in the study area in the ~~three~~ four alternatives. ~~Appendix 7~~ Appendix G summarizes in detail the approach to modelling how we model growth under each alternative. ~~In summary,~~ the methodology includes estimating total residential and commercial growth in each urban village, estimating MHA affordable housing production that development in each urban village would generate, and modeling for analysis purposes the distribution of affordable housing funded through MHA payments collected from development citywide. Since MHA is in effect or is proposed to be implemented in Downtown, South Lake Union, University District, and Uptown through separate actions, Exhibit 2–5 shows that some MHA affordable housing units would be built in the study area using MHA payments in Alternative 1 No Action. Alternative 1 also includes rent- and income-restricted housing produced through Incentive Zoning (IZ) in the study area under existing regulations. For Alternatives 2, and 3, and the Preferred Alternative, Exhibit 2–5 includes a distinct

Exhibit 2–5 20-Year Household Growth and MHA Production

20-Year Household Growth			MHA or IZ Housing Units	
Alternative 1 No Action	Comprehensive Plan	70,000	Citywide	5,272
	Citywide	76,746	Generated from Study Area	205
	Study Area	45,361	Built in Study Area	3,155
Alternative 2 Implement MHA in Study Area	Comprehensive Plan	70,000	Citywide	11,038
	Citywide	95,342	Generated from Study Area	5,717
	Study Area	63,070	Built in Study Area	7,513
Alternative 3 Implement MHA in Study Area with Distinctions for Access to Opportunity and Displacement Risk Areas	Comprehensive Plan	70,000	Citywide	10,903
	Citywide	95,094	Generated from Study Area	5,582
	Study Area	62,858	Built in Study Area	7,415
Preferred Alternative				
<u>Implement MHA in the Study Area with emphasis on:</u> <ul style="list-style-type: none"> • <u>Increasing housing options in high-opportunity urban villages</u> • <u>Increasing opportunity for housing and jobs near transit nodes</u> • <u>Moderating the scale of development capacity increases in urban villages with high displacement risk</u> • <u>Moderating development capacity increases in areas with environmental constraints</u> • <u>Increasing development capacity on known potential affordable housing sites</u> 	Comprehensive Plan	<u>70,000</u>	Citywide	<u>10,953</u>
	Citywide	<u>94,671</u>	Generated from Study Area	<u>5,633</u>
	Study Area	<u>62,387</u>	Built in Study Area	<u>7,418</u>

Source: City of Seattle Office of Planning and Community Development, 2017.

estimate of MHA affordable housing generated solely from development in the EIS study area and, separately, an estimate calculated for analysis purposes of affordable housing built in the study area funded through citywide MHA payments.

Each action alternative is associated with a detailed zoning map and a set of urban village boundary expansions. Alternative 1 No Action has no zoning changes and no urban village boundary expansions. Appendix H has maps identifying development capacity increases and urban village expansions for the study area.

~~Both~~ All action alternatives evaluate additional development capacity provided through increases in maximum height and floor area ratio (FAR) limits in commercial and multifamily zones, as well as single-family zones in designated urban villages and urban village expansion areas. Alternatives 2 and 3 differ in their approaches to urban villages according the displacement risk and access to opportunity typology when assigning MHA zoning capacity increases. The Preferred Alternative considers the

displacement risk and access to opportunity typology and introduces additional topics of emphasis for the MHA zoning changes.

Alternative 2 assigns 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 particularly consider risk of displacement when allocating development capacity increases to individual urban villages. 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 intent is to test whether and how the stated policy objective of growing equitably could be ~~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.

PREFERRED ALTERNATIVE

The Preferred Alternative is a variation and refinement of alternatives evaluated in the DEIS in a manner intended to address identified impacts. Similar to Alternative 3, the preferred alternative implements MHA with distinctions for displacement risk and access to opportunity, but includes a different emphasis based on a combination of community input, environmental constraints, and additional analysis. The Preferred Alternative would implement MHA throughout the Study Area with emphasis on:

- Increasing housing options in high-opportunity urban villages.
- Increasing housing and jobs near transit nodes.
- Moderating the scale of development capacity increases in urban villages with high displacement risk.
- Moderating development capacity increases in areas with environmental constraints.
- Increasing development capacity on known potential affordable housing sites.

The Preferred Alternative would result in a similar, though slightly lower amount of total residential growth for the city as a whole than Alternatives 2 and 3. The Preferred Alternative would result in a similar amount of net new income- and rent-restricted housing units built in the study area, a total of 7,417, compared to 7,513, and 7,417 in Alternatives 2 and 3, respectively. Under the Preferred Alternative, each individual urban village in the study area would have an amount of residential growth that

New to the FEIS

Preferred Alternative is a new section since issuance of the DEIS

is between the amounts in Alternatives 2 and 3, with the exception of Ravenna, which would have just 13 more housing units than Alternative 2 over the 20-year period.

CALCULATING THE MHA HOUSING PRODUCTION OBJECTIVE

The MHA affordable housing production objective of this proposal—to create at least 6,200 net new rent- and income-restricted units in the study area in 20 years—aligns with other goals for MHA housing production citywide. MHA payments received in one part of the city may be allocated to development of affordable housing in another part of the city, subject to applicable policies and criteria. Therefore, MHA payment funds generated from outside the study area must be considered when estimating the total amount and distribution of MHA production in the study area for the alternatives.

To estimate the MHA housing production objective, this EIS considered the goal established by the HALA Advisory Committee and subsequent actions by the City Council and Mayor to produce at least 6,000 affordable housing units citywide over 10 years. The MHA production estimated in other environmental documents for the rezoned portions of the University District, Uptown, Downtown, and South Lake Union Urban Centers are subtracted from a citywide goal in order to establish a specific goal for the EIS study area. To use a consistent timeline for environmental analysis, we translate the 10-year housing goals expressed in HALA documents to 20-year goals. To do so, we assume 53 percent of expected housing growth through 2035 will occur in the first 10-year period. This results in an objective of roughly 6,200 rent- and income-restricted homes produced through MHA in the study area alone over a 20-year period.

PROPOSED MHA REQUIREMENTS: COMMON TO THE ACTION ALTERNATIVES

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

Developers comply with MHA by either providing affordable housing on-site (performance option) or paying into a fund that OH uses to support the creation and preservation of affordable housing throughout Seattle (payment option). With the performance option, a specific percentage of homes in new multifamily residential buildings are reserved for income-eligible households and have restricted rents. These affordable homes will be comparable to market-rate units (e.g., size, number of bedrooms, and lease terms). With the payment option, developer contributions enable OH to leverage other funds to generate affordable housing through annual competitive funding awards to non-profit housing developers to build or preserve housing.

MHA requirements are proposed to vary based on (a) specific geographic areas of the city, and (b) the scale of the zoning change. MHA geographic areas are categorized as low, medium, or high based on information about rental housing sub-markets in the Seattle area from Dupre+Scott Apartment Advisors reports. Appendix E provides a map of the low, medium, and high MHA areas, which reflect varying market strength where observed rents are documented to be lower or higher. As shown in Exhibit 2–6, higher MHA requirements would apply in the strong (high) market areas, and lower MHA requirements in weaker (low) market areas. Scaling requirements in this manner is a way to avoid burdening local housing markets and suppressing housing production.

Exhibit 2–6 MHA Performance and Payment Requirements

		LOW AREA		MEDIUM AREA		HIGH AREA	
		% ¹	\$ ²	% ¹	\$ ²	% ¹	\$ ²
Proposed Requirements for Residential and Highrise Commercial							
SCALE OF ZONING CHANGE	Zones with (M) Suffix	5%	\$7.00	6%	\$13.25	7%	\$20.75
	Zones with (M1) Suffix	8%	\$11.25	9%	\$20.00	10%	\$29.75
	Zones with (M2) Suffix	9%	\$12.50	10%	\$22.25	11%	\$32.75
Proposed Requirements for Non-Highrise Commercial (up to 95')							
SCALE OF ZONING CHANGE	Zones with (M) Suffix	5%	\$5.00	5%	\$7.00	5%	\$8.00
	Zones with (M1) Suffix	8%	\$8.00	8%	\$11.25	8%	\$12.75
	Zones with (M2) Suffix	9%	\$9.00	9%	\$12.50	9%	\$14.50

¹ For multifamily residential development, performance requirements are a percentage of residential units that a building must provide as rent-restricted affordable units for income-qualified households. For commercial development, performance requirements are a percentage of chargeable floor area in commercial use that a building must provide as affordable units.

² Payment requirements are calculated by multiplying the dollar amounts shown in Exhibit 2–6 by the building's total chargeable floor area.

Source: City of Seattle, 2017.

Zone Categories

- Category 1:** Single Family,
Residential Small Lot
- Category 2:** Lowrise 1, Lowrise 2
- Category 3:** Lowrise 3,
Neighborhood
Commercial 30,
Neighborhood
Commercial 40,
Neighborhood
Commercial 55
- Category 4:** Zones with height limits
greater than 55' and
equal to or less than 95'
- Category 5:** Zones with heights
greater than 95'
(requires individual
assessment)

MHA requirements would also vary by the scale of the development capacity increase. Larger development capacity increases (i.e., bigger zoning changes) would result in higher affordable housing requirements. Variation in the requirements would be indicated by an (M), (M1), or (M2) suffix at the end of the zone title that reflects the increment of additional development capacity provided by rezoning. Existing zones are grouped into categories based on their relative development capacity. Zoning changes that result in a change from a lower zone category to a higher zone category will be subject to higher MHA requirements.

Suffixes will be assigned to zoning categories as follows:

Standard (M) suffix. If a zoning change results in a zone in the same category, the new zone will have an (M) suffix. For example, an NC2-40 zone changes to NC2-55 to allow for one additional story of development, so properties there will be zoned NC2-55 (M).

(M1) suffix. If a zoning change results in a zone in the next highest category, the new zone will have an (M1) suffix. For example, a Lowrise 1 zone (Category 2) changes to Lowrise 3 (Category 3), so properties there will be zoned LR3 (M1).

(M2) suffix. If a zoning change results in a zone two or more categories higher, the new zone will have an (M2) suffix. For example, a Single Family zone (Category 1) in an urban village changes to Lowrise 3 (Category 3), so properties there will be zoned LR3 (M2).

Proposed MHA payment and performance requirements common to both action alternatives are shown below. The multifamily performance requirement is the percent of residential units that must be provided as affordable housing, and the payment requirement is a dollar amount per square foot of chargeable gross floor area.

The suffixes indicate a magnitude of zoning capacity increases on any lot, so the quantity and location of (M), (M1) and (M2) designations describe the magnitude of the zoning change in an area. Since the action alternatives vary the location and intensity of development capacity increases, they also vary the number and location of zones with (M), (M1) and (M2) suffixes and, therefore, the amount and location of growth in different urban villages between the alternatives. And, since (M), (M1), and (M2) designations indicate different affordable housing requirements, differing quantities of (M), (M1), and (M2) will also contribute to differing amounts of affordable housing generated from development in urban villages between Alternative 2 and Alternative 3.

Development Capacity Increases to Implement MHA

The proposed action would increase development capacity to implement MHA in several ways: changing development standards in the Land Use Code, changing of a zone designation on the official zoning map, changing certain urban village boundaries on the City's Future Land Use Map (FLUM), and changing policies in the Neighborhood Plans section of the Comprehensive Plan.

Appendix F summarizes the proposed changes to development standards in the Land Use Code, which are common to both action alternatives. Changes include ~~removal of~~ modifying the density limits for the Lowrise 1 (LR1) zone; increases in maximum height and FAR limits for Lowrise 2 (LR2), Lowrise 3 (LR3), Midrise (MR), and Highrise (HR) multifamily zones; and increases in maximum height and FAR limits in Neighborhood Commercial (NC), Commercial (C), and Industrial Commercial (IC) zones. Seattle Mixed (SM) zones in the North Rainier Urban Village and near W Dravus St include similar height and FAR increases. Where land use overlays (such as the Station Area Overlay District) modify base development standards in the existing Land Use Code present, the proposed MHA development capacity increases are adjusted accordingly.

Standard Development Capacity Increases

Most proposed zoning capacity increases would allow approximately one additional story of development compared to what existing zoning allows. These one-story zoning capacity increases are referred to as “standard” MHA capacity increases and denoted with an (M) suffix. (In some zones that already allow taller buildings, (M) zoning changes would provide an increase of more than one story in height.) For most zones, the standard capacity increase results from an increase in the maximum height and FAR limits. In certain zones, modifying other standards—such as the maximum density limit or minimum lot size—would provide additional development capacity.

In certain zones, the proposal would modify development standards in the Land Use Code (e.g., a change in the maximum height limit), but the mapped zone designation would remain the same. This would apply to the Lowrise multifamily zones (LR1, LR2, and LR3) and the Midrise and Highrise multifamily zones (MR and HR). Other zones include the height limit as part of the zone name. Therefore, the zoning map would reflect new zone names for Neighborhood Commercial (NC) and Commercial

(C) zones. New designations on the zoning map would refer to amended or new development standards in the Land Use Code. For example, an existing Neighborhood Commercial zone with a 65-foot maximum height limit (NC-65) would become a Neighborhood Commercial zone with a 75-foot height limit (NC-75). Concurrently, the Land Use Code would include new NC-75 zone development standards since this variant of NC zoning does not exist today. In all cases, many existing development standards for the zone would be unchanged, while key controls on development capacity are adjusted. Appendix F provides a more complete summary of the proposed Land Use Code changes.

Selective Development Capacity Increases

73 percent of the proposed MHA development capacity increases in Alternatives 2, and 77 percent of the capacity increases in Alternative 3, and 78 percent in the Preferred Alternative, would fall into the category of standard increases summarized above. In certain instances, the action alternatives include larger zoning increases. These larger increases, referred to as “selective” development capacity increases, would increase zoned capacity by more than one zone category increment. For example, instead of an NC zone with a 40-foot height limit becoming an NC zone with a 55-foot height limit, the alternative proposes an NC zone with a 75-foot height limit. Selective zoning increases are indicated by an (M1) or (M2) suffix in the zone name and denote higher MHA affordable housing payment or performance requirements.

The alternatives include selective capacity increases where directly supported by a combination of policies in the Comprehensive Plan, basic planning principals and MHA Implementation Principles, and rezone criteria in the Land Use Code. Independent judgement and evaluation by City planning staff was also applied. Concepts used to identify selective capacity increases include.

Planning Principles and Rezone Criteria

- Provide transitions between higher- and lower-scale zones as additional development capacity is accommodated.
- Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.
- Encourage more small-scale multi-unit housing that is family friendly, such as cottages, duplexes or triplexes, rowhouses, and townhouses.
- Implement the urban village expansions using 10-minute walksheds similar to those shown in the draft Seattle 2035 Comprehensive Plan update.

- Do not increase development capacity in designated Historic Districts, even if it means these areas do not contribute to housing affordability through MHA.
- Ensure that, in general, any development capacity increases in urban village expansion areas are compatible in scale to the existing neighborhood context.

City of Seattle Comprehensive Plan Goals and Policies

- G.S 1.6. Plan for development in urban centers and urban villages in ways that will provide all Seattle households, particularly marginalized populations, with better access to services, transit, and educational and employment opportunities.
- G.S 1.7 Promote levels of density, mixed-uses, and transit improvements in urban centers and villages that will support walking, biking, and use of public transportation.
- G.S. 1.12 Include the area that is generally within a ten-minute walk of light rail stations or very good bus service in urban village boundaries, except in manufacturing/ industrial centers.
- G.S 1.13 Provide opportunities for marginalized populations to live and work in urban centers and urban villages throughout the city by allowing a variety of housing types and affordable rent levels in these places.
- LU G.1 Achieve a development pattern consistent with the urban village strategy, concentrating most new housing and employment in urban centers and villages, while also allowing some infill development compatible with the established context in areas outside centers and villages.
- LU 2.1 Allow or prohibit uses in each zone based on the zone's intended function as described in this Land Use element and on the expected impacts of a use on other properties in the zone and the surrounding area. Generally allow a broad mix of compatible uses in the urban centers and urban villages.
- LU 1.4 Provide a gradual transition in building height and scale inside urban centers and urban villages where they border lower-scale residential areas.
- LU 2.7 Review future legislative rezones to determine if they pose a risk of increasing the displacement of residents, especially marginalized populations, and the businesses and institutions that serve them.

In addition to the principles listed above, direct community input about specific locations in urban villages during public outreach was considered in forming the alternatives.

Estimating Amount and Distribution of Growth for Action Alternatives

The EIS calculates an amount and distribution of household and job growth for a 20-year time horizon for each action alternative. The amount and location of future growth has been estimated using a computer model that considers several variables, including the following key factors:

- The formally adopted Seattle 2035 Comprehensive Plan housing and job growth estimates citywide and in each urban village;
- The increment of land use changes resulting from a specific parcel-based citywide zoning proposal for each alternative;
- Unique baseline conditions in each urban village (e.g., the existing proportions of multifamily and commercially zoned lands);
- The specific parcels most likely to redevelop considering their existing development; and
- Relative market strength in different geographic areas of the city.

Appendix G is a technical memo that describes the modelling methodology and its assumptions.

The model provides growth estimates for each urban village and areas outside urban villages. Distributing growth by urban village facilitates evaluations of varied growth patterns and relative environmental impacts affecting localized areas. Certain urban villages have higher growth estimates under one action alternative compared to the other. Growth for each urban village can also be compared to growth that would occur under Alternative 1 No Action. Exhibit 2–7 summarizes estimated growth amounts for each Alternative, and Exhibit 2–8 shows the estimates as a percentage increase. The resulting variations in growth pattern in urban villages enables analysis of potential impacts associated with different growth levels.

Residential and Commercial Growth Estimate Notes

The following notes provide additional is context for understanding the estimates in Exhibit 2–6:

- Geographies outside the study area are included for background information purposes.
- For estimation purposes, the total amount of MHA payments are assumed to be allocated proportionally to an urban village based on its share of citywide residential growth.
- In Alternative 1, all MHA production comes from areas outside the study area, though some of those MHA payment funds would be allocated to study area urban villages. Alternative 1 also reflects some affordable housing production through the existing IZ program in the study area.
- The assumed amount of housing growth varies slightly for areas outside the study area between Alternative 1 and the action alternatives because a portion of the citywide MHA housing payments would be located in those areas in the action alternatives, subject to allocation policies and criteria.

The analysis chapters of this EIS refer to growth estimates in Exhibit 2–7. Since housing is the primary focus of the action, the discussion of growth often centers on residential growth. The city's largest employment centers (Downtown, South Lake Union, and the Manufacturing/Industrial Centers) are outside the study area, so growth in the study area skews towards housing. Yet Exhibit 2–8 shows that employment growth is also a component of the alternatives. Where residential growth is referred to as a descriptor of growth in analysis chapters, it is understood that employment growth is also considered.

Exhibit 2-7 Residential and Commercial Growth

		BASELINE (2016)		ALT. 1 NO ACTION		ALT. 2		ALT. 3		PREFERRED ALT.	
URBAN VILLAGE		Housing	Jobs	Housing	Jobs	Housing	Jobs	Housing	Jobs	Housing	Jobs
Outside EIS Study Area	Downtown	24,347	165,416	13,600	37,100	14,104	37,100	14,088	37,100	14,109	37,100
	South Lake Union	4,536	40,482	8,500	15,900	8,815	15,900	8,805	15,900	8,818	15,900
	Uptown	7,483	15,092	3,751	2,800	3,810	2,800	3,806	2,800	3,811	2,800
	U District ¹	8,181	33,701	5,533	5,000	5,544	5,000	5,538	5,000	5,546	5,000
High Displacement Risk & Low Access to Opportunity	Rainier Beach	1,520	1,130	500	500	681	568	607	542	637	561
	Othello	2,836	1,439	900	800	1,361	832	1,072	829	1,079	800
	Westwood-Highland Park	2,150	1,572	600	100	939	114	790	105	865	113
	South Park	1,292	1,355	400	300	646	313	550	313	561	313
	Bitter Lake Village	3,257	4,605	1,300	2,300	1,516	2,411	1,501	2,401	1,502	2,404
Low Displacement Risk & High Access to Opportunity	Green Lake	2,605	1,814	600	150	782	167	1,218	211	1,087	215
	Roosevelt	1,616	1,762	867	500	992	525	1,269	549	1,195	549
	Wallingford	3,222	3,119	1,000	150	1,395	167	2,066	179	1,947	172
	Upper Queen Anne	1,724	1,882	500	30	594	33	643	41	644	43
	Fremont	3,200	8,882	1,300	843	1,582	843	2,050	843	2,003	843
	Ballard	9,168	7,861	4,000	3,900	5,467	4,384	5,812	4,411	5,724	4,372
	Madison-Miller	2,781	1,475	800	500	1,171	570	1,488	679	1,533	702
	Greenwood-Phinney Ridge	1,757	2,067	500	500	604	548	612	558	610	554
	Eastlake	3,829	5,774	800	170	1,006	170	1,482	170	1,110	170
	West Seattle Junction	3,880	3,488	2,300	1,700	3,041	1,811	3,351	1,813	3,133	1,815
	Admiral	1,131	1,468	300	50	375	55	467	68	435	60
	Crown Hill	1,307	850	700	100	1,128	111	1,784	159	1,455	145
	Ravenna ²	1,621	3,559	1,361	3,234	1,703	3,769	1,639	3,521	1,716	3,765
	Columbia City	2,683	2,672	800	800	1,205	903	1,049	870	1,114	870
	Lake City	2,546	1,533	1,000	800	1,154	833	1,148	830	1,150	830
High Displacement Risk & High Access to Opportunity	Northgate	4,535	12,898	3,000	6,000	4,526	8,367	4,450	8,355	4,450	8,336
	First Hill-Capitol Hill	29,619	39,987	6,000	3,000	10,283	3,717	7,246	3,413	8,097	4,218
	North Beacon Hill	1,474	593	400	300	712	312	544	309	651	330
	North Rainier	2,454	6,136	1,000	3,100	1,378	3,609	1,267	3,600	1,248	3,559
	23rd & Union-Jackson	5,451	4,851	1,600	1,000	2,668	1,132	2,195	1,132	2,174	1,140
Low Displacement Risk & Low Access to Opportunity	Aurora-Licton Springs	3,454	2,319	1,000	600	1,217	633	1,287	658	1,239	640
	Morgan Junction	1,342	579	400	30	746	42	1,086	57	849	38
Outside Villages		188,122	85,478	11,433	20,277	14,199	22,848	14,186	22,879	14,179	22,852
Manufacturing & Industrial Centers (Outside EIS Study Area)	Ballard-Interbay-Northend ³	660	18,173	0	3,000	0	3,000	0	3,000	0	3,000
	Greater Duwamish	405	65,761	0	6,000	0	6,000	0	6,000	0	6,000
MHA Affordable Homes in EIS Study Area	Generated in Study Area	—	—	205	—	5,717	—	5,582	—	5,633	—
	Built in Study Area	—	—	2,993	—	7,513	—	7,415	—	7,418	—
TOTAL		232,981	223,877	45,361	51,734	63,070	59,786	62,858	59,496	62,387	60,410
Citywide	MHA Affordable Homes	—	—	5,272	—	11,038	—	10,903	—	10,954	—
	TOTAL	336,188	549,773	76,746	121,534	95,342	129,586	95,094	129,296	94,671	130,210

Exhibit 2–8 Percentage Increase in Residential and Commercial Growth Compared to No Action

URBAN VILLAGE	ALT. 2		ALT. 3		PREFERRED ALT.	
	Housing	Jobs	Housing	Jobs	Housing	Jobs
High Displacement Risk & Low Access to Opportunity	39%	6%	22%	5%	26%	5%
Rainier Beach	36%	14%	21%	8%	27%	8%
Othello	51%	4%	19%	4%	20%	4%
Westwood-Highland Park	57%	14%	32%	5%	44%	5%
South Park	62%	4%	37%	4%	40%	4%
Bitter Lake Village	17%	5%	15%	4%	16%	4%
Low Displacement Risk & High Access to Opportunity	29%	12%	45%	13%	40%	13%
Green Lake	30%	12%	103%	41%	81%	41%
Roosevelt	14%	5%	46%	10%	38%	10%
Wallingford	39%	11%	107%	20%	95%	20%
Upper Queen Anne	19%	11%	29%	37%	29%	37%
Fremont	22%	0%	58%	0%	54%	0%
Ballard	37%	12%	45%	13%	43%	13%
Madison-Miller	46%	14%	86%	36%	92%	36%
Greenwood-Phinney Ridge	21%	10%	22%	12%	22%	12%
Eastlake	26%	0%	85%	0%	39%	0%
West Seattle Junction	25%	11%	56%	36%	45%	36%
Admiral	32%	7%	46%	7%	36%	7%
Crown Hill	61%	11%	155%	59%	108%	59%
Ravenna ²	24%	13%	24%	13%	24%	13%
High Displacement Risk & High Access to Opportunity	59%	26%	30%	23%	37%	23%
Columbia City	51%	13%	31%	9%	39%	9%
Lake City	15%	4%	15%	4%	15%	4%
Northgate	51%	39%	48%	39%	48%	39%
First Hill-Capitol Hill	71%	24%	21%	14%	35%	14%
North Beacon Hill	78%	4%	36%	3%	63%	3%
North Rainier	38%	16%	27%	16%	25%	16%
23rd & Union-Jackson	67%	13%	37%	13%	36%	13%
Low Displacement Risk & Low Access to Opportunity	40%	7%	70%	14%	49%	14%
Aurora-Licton Springs	22%	6%	29%	10%	24%	10%
Morgan Junction	87%	40%	172%	91%	112%	91%
Outside Villages	24%	13%	24%	13%	24%	13%
STUDY AREA TOTAL	39%	16%	39%	15%	38%	17%

Source: City of Seattle, 2017.

(1) This is the area receiving MHA development capacity through the U District legislation, outside the study area.

(2) This is the area in the University Community Urban Center that is inside the study area.

(3) 7,000 jobs in addition to the Comprehensive Plan estimate in the table is included for transportation analysis to account for a proposed Expedia campus.

ALTERNATIVE 1 No Action

Under Alternative 1 No Action, MHA would not be implemented in the study area. No area-wide rezones and no development capacity increases would occur. The No Action alternative includes an amount of growth similar to the 20-year minimum growth estimate of 70,000 additional households and 115,000 jobs that must be planned for in the Seattle 2035 Comprehensive Plan.

No affordable housing units would be generated from MHA within the study area. However, the no action alternative includes an estimation of the number of MHA units that would be produced through private development in the Downtown, South Lake Union, University District, and Uptown subareas. In total, citywide, 5,272 MHA units are expected over 20 years in Alternative 1. MHA payments generated in one part of the city may be allocated to development of affordable housing in another part of the city, subject to applicable Office of Housing policies and criteria. Therefore, MHA payments generated from outside the study area must be considered when estimating the total amount of MHA units produced in the study area. An estimated 2,993 of these MHA units generated by payment from development outside the study area, would be located within the study area in Alternative 1. An additional, 205 affordable housing units would be produced from the existing incentive zoning program in the study area.

No changes to current urban village boundaries are included in Alternative 1, and there would be no change to the Future Land Use map. During the Seattle 2035 Comprehensive Plan, options for expanding several urban village boundaries in proximity to light rail and other very good transit service were identified and studied in environmental documents. However, the studied urban village boundary expansions were not adopted in the final Seattle 2035 Comprehensive Plan. Areas outside of existing urban villages that are zoned Single Family would not experience zoning change under Alternative 1.

Under Alternative 1 growth trends would continue as described in the preferred alternative in the Seattle 2035 Comprehensive Plan FEIS. The types, character and relative geographic distribution of future development are expected to occur in ways that are guided by existing policies and zoning. The pattern of growth is based on the Urban Village and Urban Center strategy. Pursuant to the Seattle 2035 Comprehensive Plan adopted in October of 2016, It guides growth toward urban villages and centers with light rail stations and to places with very good transit

service. All new development under Alternative 1 would be subject to existing development standards, and existing regulations.

ALTERNATIVE 2 Implement MHA in the Study Area

Alternative 2 would implement MHA in the study area. Basic planning concepts, MHA Implementation Principles, and guidance from the Comprehensive Plan and Land Use Code have been used to inform the development capacity increases under Alternative 2. The overall pattern and distribution of growth in Alternative 2 follows the Urban Village and Centers growth strategy. Zoning changes and MHA implementation is directed to Urban Villages and Urban Centers, and the areas zoned for commercial and multifamily development under existing regulations. Under Alternative 2 incrementally greater density of housing and employment would occur within the same overall pattern of the Seattle 2035 Comprehensive Plan.

Appendix H provides a detailed zoning map identifying all the proposed MHA development capacity increases in Alternative 2. Changes to development standards in the Land Use Code for the “standard” zoning capacity increases are included in Alternative 2. Displacement risk and access to opportunity in individual urban villages as identified in the Growth and Equity Analysis would not be considered as explicit factors in selecting the locations of additional growth or zoning designations on the map in Alternative 2.

Alternative 2 proposes urban village boundary expansions approximating a full 10-minute walkshed in 10 urban villages where boundary expansions were proposed in the Seattle 2035 update process, plus a small urban village boundary expansion in Northgate. (Creation of a new urban village at NE 130th St is not proposed as a part of this action.) The Comprehensive Plan FLUM would be modified to reflect larger urban villages in these areas.

Alternative 2 considers the minimum 20-year growth estimates of 70,000 households and 115,000 jobs incorporated in the Seattle 2035 Comprehensive Plan, plus additional housing and job growth given the increased development capacity based on the Alternative 2 zoning map. In Alternative 2, total estimated citywide growth until 2035, including the additional increment of growth associated with MHA, would be 95,342 total housing units, 129,586 jobs, and 11,038 affordable housing units produced through MHA.

Exhibit 2–9 Approach to MHA Development Capacity Increases, Alternative 2

Displacement Risk and Access to Opportunity	Intensity of Development Capacity Increases and Expansion of Urban Village Boundaries	Urban Villages
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>	<p>All Urban Villages</p> <p><i>(Boundary expansions apply only to those urban villages identified for possible urban village boundary expansion in Seattle 2035.)</i></p>

Source: City of Seattle, 2017.

Some areas currently zoned Single Family are proposed for MHA and zoning capacity increases in Alternative 2. Rezones of single family areas are limited to single family lands in existing urban villages and in urban village expansion areas. Where single family lands are rezoned, Alternative 2 includes a mix of and Residential Small Lot (RSL) and Lowrise (LR) multifamily zoning.

In Alternative 2, most MHA capacity increases are standard (M) zoning capacity increases, reflecting a single-tier increase in zoned capacity. Approximately 73 percent of all lands proposed for MHA would have an (M) designation, while 23 percent would have (M1) and four percent (M2).

The proposed zoning and Land Use Code changes would generally continue the overall pattern and distribution of growth anticipated in the Seattle 2035 Comprehensive Plan. In most MHA implementation areas, the location and extent of existing multifamily and commercial zones is not proposed to change, but the scale of already allowed uses in the area would increase incrementally.

ALTERNATIVE 3 Implement MHA with Distinctions for Displacement Risk and Access to Opportunity Areas

Under Alternative 3, specific MHA zoning capacity increases would be based on the guiding principles summarized for Alternative 2 above, plus explicit consideration of each urban village's location on the Displacement Risk and Access to Opportunity typology identified in the Growth and Equity Analysis. Equitable development approaches identified in the Growth and Equity Analysis are considered in the assignment of development capacity increases and the urban village boundary expansions for specific locations.

Exhibit 2–10 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	Urban Villages
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 reduced urban village boundary expansions to a 5-minute walkshed or less from the frequent transit station.</p>	<ul style="list-style-type: none"> • Rainier Beach* • Othello* • Westwood–Highland Park • South Park • Bitter Lake
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>	<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	<p>Apply medium development capacity increases, resulting in a significant proportion of (M) zoning changes, but also resulting in some (M1) designations and limited instances of (M2) designations.</p> <p>Apply reduced urban village boundary expansions to a 5-minute walkshed or less from the frequent transit station.</p>	<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	<p>Apply medium development capacity increases, resulting in a significant proportion of (M) zoning changes, but also resulting in 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>	<ul style="list-style-type: none"> • Aurora–Licton Springs • Morgan Junction

* Includes a proposed urban village expansion.

Source: City of Seattle, 2017.

In general, areas of higher opportunity were considered for greater development capacity increases in order to increase the potential for housing opportunities and inclusion of affordable housing. Simultaneously, areas with high risk of displacement were considered for smaller development capacity increases in order to minimize the potential for displacement. Exhibit 2–10 summarizes how displacement risk and access to opportunity type influence Alternative 3. Appendix H provides a detailed zoning map with MHA development capacity increases associated with Alternative 3.

Alternative 3 assumes the minimum 20-year growth estimates of 70,000 households and 115,000 jobs from Seattle 2035, plus additional growth associated with increased development capacity based on the Alternative

3 zoning map. In Alternative 3, estimated total growth in 2035—including MHA housing units and an additional assumed increment of growth—is 95,094 total housing units, 128,296 jobs, and 10,903 affordable housing units produced through MHA.

Alternative 3 would expand the boundaries of 10 urban villages and modify the Future Land Use map to reflect the larger urban villages. However, expansion areas for urban villages with high displacement risk are reduced from a 10-minute to a 5-minute approximate walkshed from the transit node. This results in smaller urban village boundary expansions for Rainier Beach, Othello, North Rainier, North Beacon Hill, and 23rd & Union–Jackson in Alternative 3 compared to Alternative 2.

South Park is an area with high displacement risk and low access to opportunity. It is unique among urban villages because it is nearly surrounded by a Manufacturing and Industrial Center. In recognition of unique conditions and its displacement risk and access to opportunity category, a portion of South Park would not have MHA implementing zoning changes under Alternative 3.

The proposed zoning and Land Use Code changes would generally continue the overall pattern and distribution of growth anticipated in the Seattle 2035 Comprehensive Plan. In most MHA implementation areas, the location and extent of existing multifamily and commercial zones is not proposed to change, but the scale of already allowed uses in the area would be allowed to increase incrementally. The overall urban village land use pattern would not be altered, with the exception of urban village expansions studied in the Seattle 2035 planning process. Compared to Alternative 1 No Action, the intensity of uses and rate of growth within the planned land use pattern would increase incrementally.

As in Alternative 2, most development capacity increases in Alternative 3 are single-tier (M) zoning changes. 77 percent of all lands proposed for MHA have an (M) designation, while 20 percent would have (M1) and three percent (M2). However, while overall percentages of (M), (M1), and (M2) zoning designations are similar to Alternative 2, the distribution of those designations varies substantially based on consideration of Displacement Risk and Access to Opportunity, as seen in the following figures.

New to the FEIS

Preferred Alternative, including Exhibit 2–11, is an entirely new section since issuance of the DEIS

PREFERRED ALTERNATIVE

Implement MHA throughout the study area with emphasis on:

- Increasing housing options in high-opportunity urban villages
- Increasing housing and jobs near transit nodes

- Moderating the scale of development capacity increases in urban villages with high displacement risk
- Moderating development capacity increases in areas with environmental constraints
- Increasing capacity on known affordable housing development sites

The Preferred Alternative is a variation of the DEIS Action Alternatives that includes features most similar to Alternative 3. Specific MHA zoning capacity increases would be based on the basic planning concepts, MHA Implementation Principles, and guidance from the Comprehensive Plan and Land Use Code as summarized for DEIS Action Alternatives 2 and 3. Each urban village's location on the Displacement Risk and Access to Opportunity typology is considered. Compared to Alternative 2 and 3, the proposed MHA zoning capacity increases place greater emphasis on proximity to transit nodes, and on the presence of environmental constraints.

In general, urban villages with access to high opportunity and low displacement risk identified in the Growth and Equity Analysis are considered for relatively greater development capacity increases, as a means to increase the potential for new housing opportunities and inclusion of affordable housing in these areas. Increasing housing opportunity in these urban villages also responds to strong market demand and could relieve development pressure in other areas of the city at high risk of displacement.

The Preferred Alternative also emphasizes opportunities for housing near frequent transit nodes. For all urban villages, the Preferred Alternative includes relatively greater capacity increases in locations close to very good transit service. Urban village boundary expansions approximating a complete 10-minute walkshed are proposed for urban villages studied for boundary expansion in the Seattle 2035 Comprehensive Plan. In high displacement risk areas, where the scale of development capacity increases is generally moderated, some relatively greater capacity increases are still located within an estimated 5-minute walkshed of very good transit nodes.

In the Preferred Alternative, proposed MHA development capacity increases also consider high displacement risk as identified in the Growth and Equity Analysis. In urban villages that have high displacement risk, the scale of development capacity increases is limited to the lowest amount needed to put MHA in effect, except for areas within the 5-minute walkshed to a transit node. Additional mitigation measures that recognize the potential pressures for cultural and economic displacement are described in the Housing and Socioeconomics Chapter of the FEIS.

Exhibit 2–11 summarizes the MHA implementation approach for each displacement risk and access to opportunity urban village type in the Preferred Alternative. Appendix H provides a detailed zoning map with MHA development capacity increases associated with the Preferred Alternative.

The presence of critical areas and other environmental constraints is also given greater emphasis. Due to the overlap of multiple environmental constraints and limited transit service, development capacity increases everywhere in the South Park urban village are reduced to the minimum necessary to implement MHA. This approach to MHA implementation also applies to areas outside urban villages. The Preferred Alternative applies the minimum development capacity increases in all areas within 500 feet of major freeways as a means to consider air quality. Urban village expansions are avoided in locations where an environmentally critical area was identified.

In the Preferred Alternative, known sites for future 100 percent affordable housing developments that are under site control by a non-profit affordable housing provider are assigned relatively greater capacity increases. These relatively larger capacity increases are assigned regardless of the urban village's displacement/opportunity type, and whether or not the site is within a 5-minute walk of frequent transit.

The Preferred Alternative assumes the minimum 20-year growth estimates of 70,000 households and 115,000 jobs from Seattle 2035, plus additional growth associated with increased development capacity based on the Preferred Alternative zoning maps. Estimated citywide growth in 2035—including MHA housing units and an additional assumed increment of growth—is 94,671 total housing units, 130,210 jobs, and 10,954 affordable housing units produced through MHA.

The proposed zoning and Land Use Code changes would generally continue the overall pattern and distribution of growth anticipated in the Seattle 2035 Comprehensive Plan. In most MHA implementation areas, the location and extent of existing multifamily and commercial zones is not proposed to change, but the scale of already allowed uses in the area would be allowed to increase incrementally. The overall urban village land use pattern would not be altered, with the exception of urban village expansion areas previously studied in the Seattle 2035 planning process.

Compared to Alternative 1 No Action, the intensity of uses and rate of growth within the planned land use pattern would increase incrementally.

Exhibit 2–11 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.

COMPARISON OF ALTERNATIVES 2, 3, AND THE PREFERRED ALTERNATIVE

The graphs on the following pages describe and provide an overall comparison of Alternatives 2, 3, and the Preferred Alternative. For each displacement risk and access to opportunity category of urban villages, a summary of the percentage of redevelopable lands with proposed (M), (M1), or (M2) scale development capacity increases is provided. These percentages are one way to describe in summary the proportion of greater or lesser intensity MHA zoning changes for different types of urban villages in different alternatives.

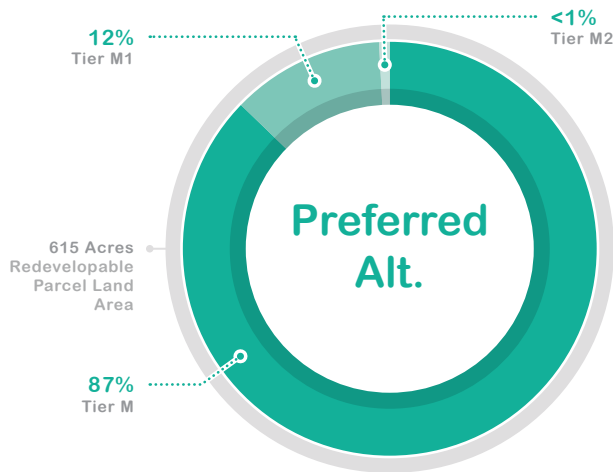
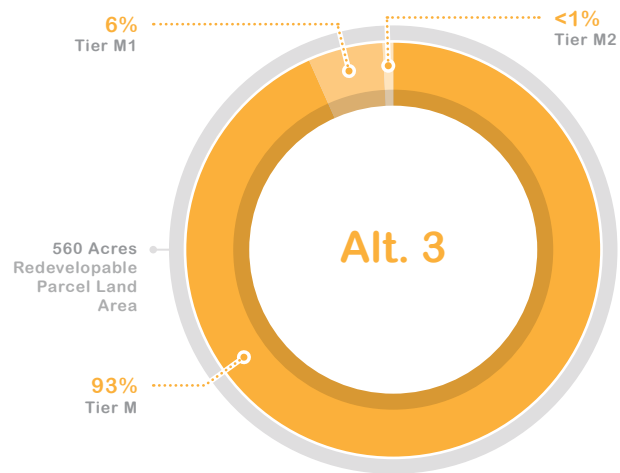
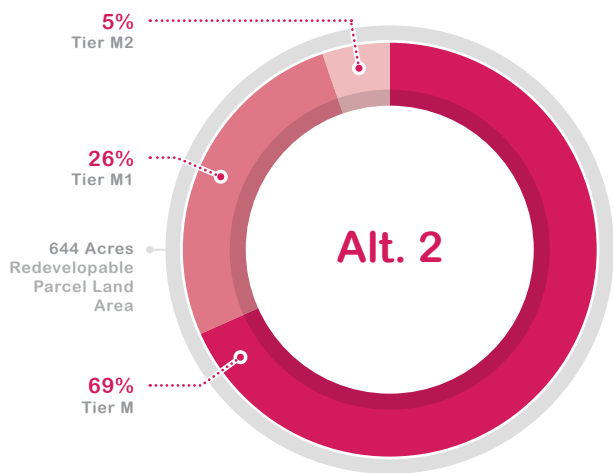


Exhibit 2–12

High Displacement Risk and Low Access to Opportunity Areas Redevelopable Parcel Land Area by MHA Tier

Rainier Beach, Othello, Westwood-Highland Park, South Park, Bitter Lake Village

Source: City of Seattle, 2017.



In urban villages with high displacement risk and low access to opportunity, Alternative 3 has a significantly lower percentage of redevelopable land in the selective (M1) and (M2) designations, compared to Alternative 2. Considering the high displacement risk, the intensity of development capacity increases is reduced in these areas in Alternative 3. For urban villages, the major differences in Alternative 3, compared to Alternative 2, are:

- Smaller urban village boundary expansions.
- In areas of existing Single Family zoning, fewer applications of the Lowrise 1 (LR1) and Lowrise 2 (LR2) multifamily zones and more application of the Residential Small Lot (RSL) zone.
- In South Park, retention of Single Family zoning without MHA in a portion of the urban village.
- Fewer instances of height increases greater than one story in Commercial or Neighborhood Commercial zones.

The Preferred Alternative is similar to Alternative 3 with a very high percentage of redevelopable land in the (M) designation for these urban villages. However, compared to Alternative 3 there is a slightly higher percentage of redevelopable land in the (M1) designation due to areas with some higher intensity zoning changes within the 5-minute walk to a transit node.

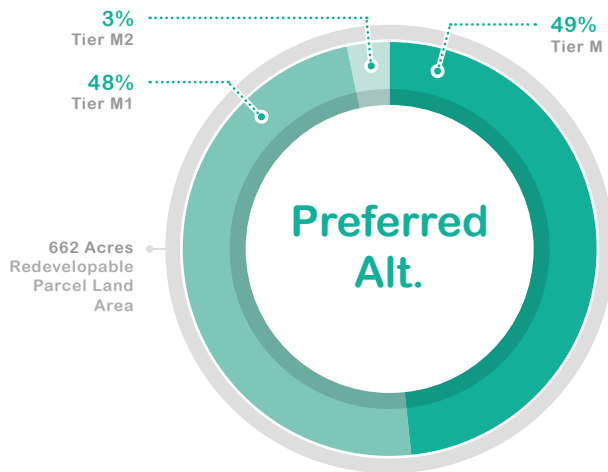
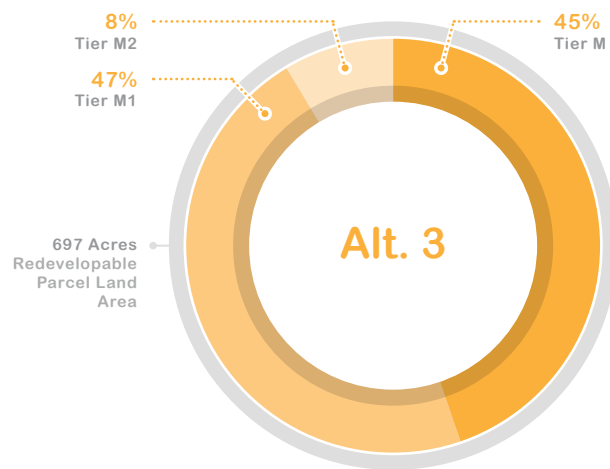
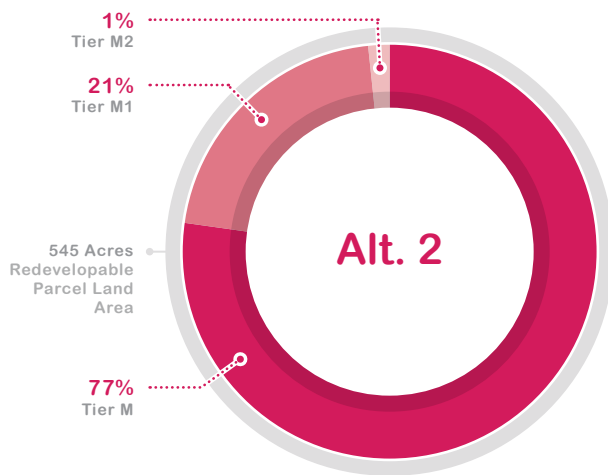


Exhibit 2-13

Low Displacement Risk and High Access to Opportunity Areas Redevelopable Parcel Land Area by MHA Tier

Green Lake, Roosevelt, Wallingford, Upper Queen Anne, Fremont, Ballard, Madison-Miller, Greenwood-Phinney Ridge, Eastlake, Admiral, West Seattle Junction, Crown Hill, Ravenna

Source: City of Seattle, 2017.



In urban villages with low displacement risk and high access to opportunity, more land would have selective (M1) and (M2) capacity increases in Alternative 3 than in Alternative 2. This approach represents an equitable development strategy, which makes implementation decisions that would result in relatively more housing opportunity and generate more MHA affordable housing units in these neighborhoods.

For these urban villages in Alternative 3, major differences compared to Alternative 2 are:

- Larger urban village boundary expansions.
- In areas of existing Single Family zoning, more applications of the Lowrise 1 (LR1) and Lowrise 2 (LR2) multifamily zones, some instances of Lowrise 3 (LR3) application, and fewer applications of the Residential Small Lot (RSL) zone.
- More instances of height increases greater than one additional story in Commercial or Neighborhood Commercial zones.

The Preferred Alternative is similar to Alternative 3, with a relatively high percentage of redevelopable land with (M1) tier capacity increases, which are located throughout these urban villages. However, compared to Alternative 3, the Preferred Alternative would include fewer (M2) tier capacity increases. This is primarily due to fewer proposed changes from Single Family zoned areas to Lowrise 3 or Neighborhood Commercial zones.

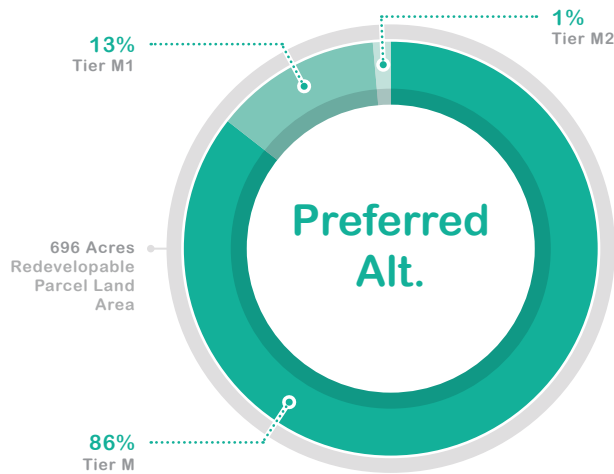
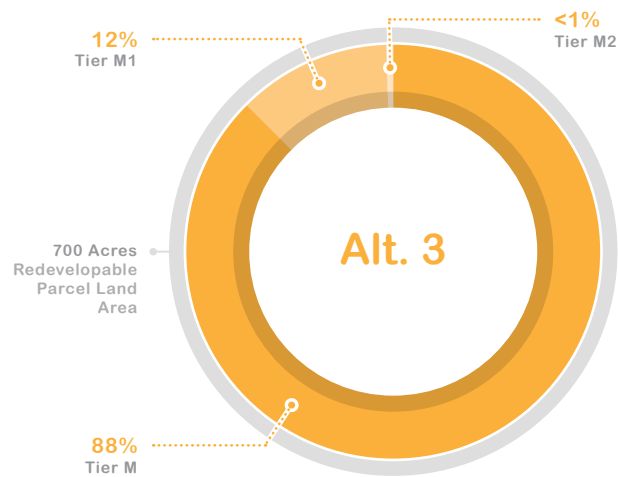
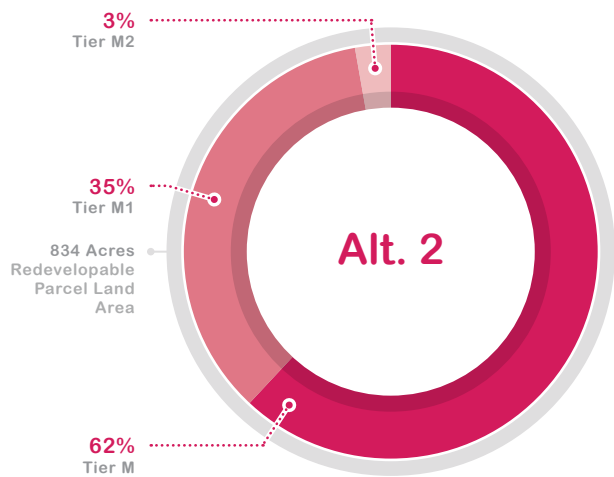


Exhibit 2-14

High Displacement Risk and High Access to Opportunity Areas Redevelopable Parcel Land Area by MHA Tier

Columbia City, Lake City, Northgate, First Hill–Capitol Hill, North Beacon Hill, North Rainier, 23rd & Union–Jackson

Source: City of Seattle, 2017.



In urban villages with high displacement risk and high access to opportunity, smaller percentages of redevelopable lands have selective (M1) and (M2) capacity increases in Alternative 3 compared to in Alternative 2. This reflects intentional reductions in capacity increases in light of the high risk of displacement in these areas. However, Alternative 3 also considers the relatively higher levels of access to opportunity in these neighborhoods.

Compared to Alternative 2, in Alternative 3, these urban villages have:

- Smaller urban village boundary expansions.
- In areas of existing Single Family zoning, fewer applications of the Lowrise 1 (LR1) and Lowrise 2 (LR2) multifamily zones, and more applications of the Residential Small Lot (RSL) zone.
- Fewer applications of the Midrise (MR) residential, particularly in First Hill–Capitol Hill.
- Fewer instances of height increases greater than one additional story in Commercial or Neighborhood Commercial zones.

The Preferred Alternative is similar to Alternative 3 as it would have a high percentage of redevelopable land in the (M) tier for these urban villages. The percentage of redevelopable land in the (M1) and (M2) tiers would be slightly higher than Alternative 3 due to some relatively larger development capacity increases within a 5-minute walk to frequent transit nodes.

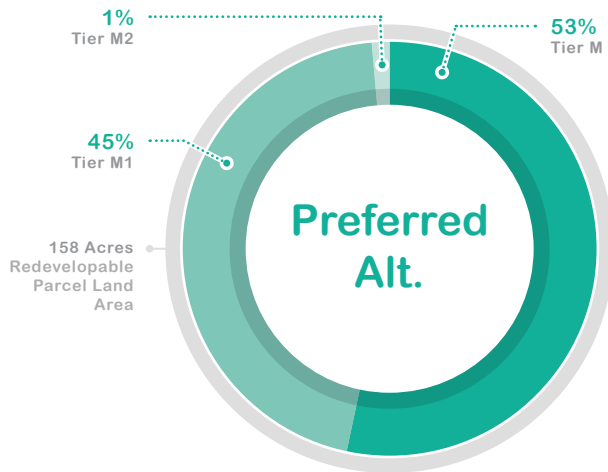
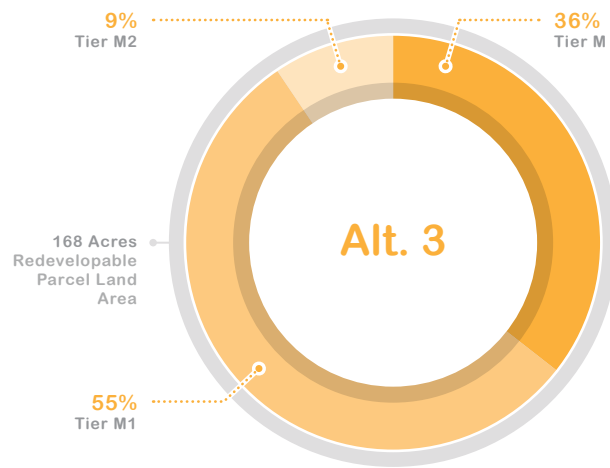
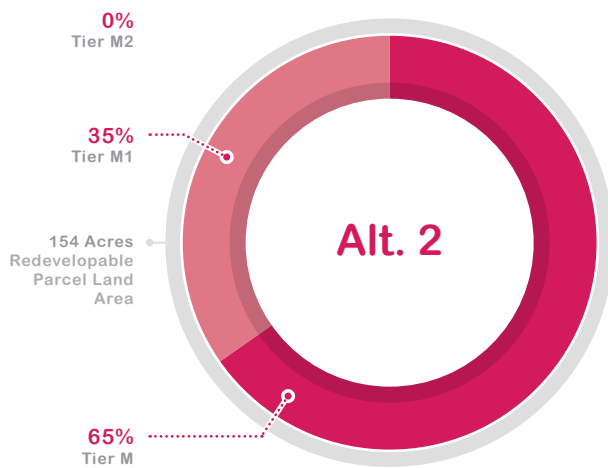


Exhibit 2–15

Low Displacement Risk and Low Access to Opportunity Areas Redevelopable Parcel Land Area by MHA Tier

Aurora–Licton Springs, Morgan Junction

Source: City of Seattle, 2017.



In areas with low displacement risk and low access to opportunity, greater percentages of redevelopable lands have (M1) and (M2) capacity increases in Alternative 3 compared to Alternative 2. These neighborhoods have the potential to accommodate new housing without triggering strong displacement pressure.

For these urban villages, In Alternative 3, compared to Alternative 2, there are:

- In areas of existing Single Family zoning, more applications of the Lowrise 1 (LR1) and Lowrise 2 (LR2) multifamily zones, and fewer applications of the Residential Small Lot (RSL) zone.
- More instances of height increases greater than one additional story in Commercial or Neighborhood Commercial zones, especially in the Aurora-Licton Spring urban village.

The Preferred Alternative for these urban villages would be in between Alternative 2 and Alternative 3 with the respect to the percentages of (M1) and (M2) tier capacity increases. It would have a higher percentage of land in (M1) and (M2) designations than Alternative 2, but less than Alternative 3. A relatively high percentage of redevelopable lands would result in the (M1) tier for these urban villages, but instances of (M2) tier capacity increases are far fewer than in Alternative 3.

MHA Affordable Unit Production in Action Alternatives

The location and pattern of the development capacity increases would vary between the Action Alternatives, as would the quantities of MHA affordable housing units. Exhibit 2–16 summarizes the estimates of MHA housing in the different Displacement Risk and Access to Opportunity categories in urban villages that is assumed to be built on-site through performance, and the quantity generated through payment in urban villages in the different Displacement Risk and Access to Opportunity categories.

Exhibit 2–16 Action Alternative MHA Affordable Housing Performance and Payment Units

	MHA PERFORMANCE UNITS			MHA UNITS BUILT WITH PAYMENTS*		
	Alt. 2	Alt. 3	Preferred Alternative	Alt. 2	Alt. 3	Preferred Alternative
High Displacement Risk and Low Access to Opportunity	115	86	<u>92</u>	505	439	<u>457</u>
Low Displacement Risk and High Access to Opportunity	390	584	<u>523</u>	1,947	2,319	<u>2,224</u>
High Displacement Risk and High Access to Opportunity	528	339	<u>380</u>	2,105	1,693	<u>1,812</u>
Low Displacement Risk and Low Access to Opportunity	53	76	<u>60</u>	193	230	<u>206</u>
Outside of Urban Villages	284	271	<u>270</u>	1,393	1,377	<u>1,396</u>

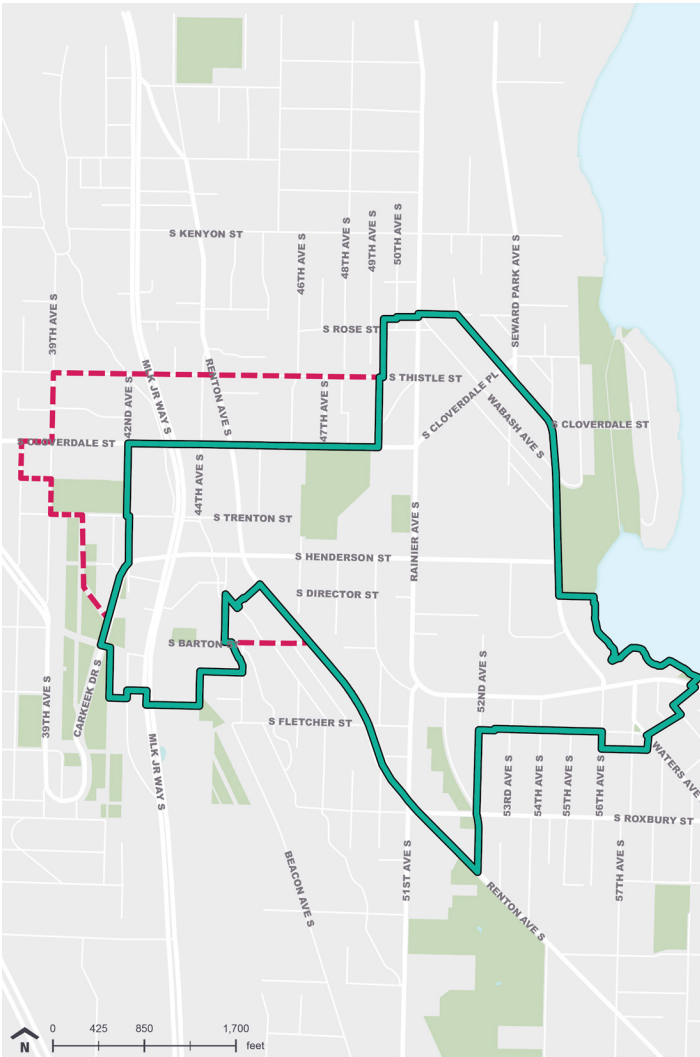
* Assumes MHA payments are allocated proportional to areas based on share of citywide housing growth.

Source: City of Seattle, 2017.

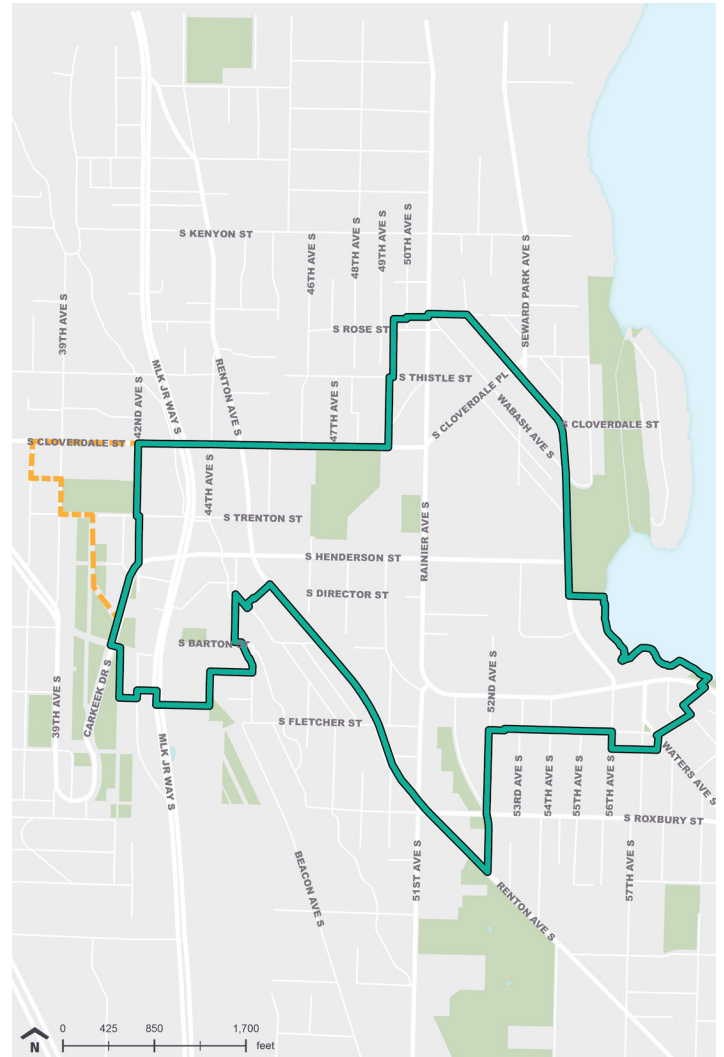
Urban Village Expansion Areas

The proposed action includes urban village boundary expansions studied in the Seattle 2035 Comprehensive Plan process. Under the proposal, expansion areas would be designated as ~~have the~~ Urban Village ~~designation~~ on the FLUM. (This action ~~would be~~ is docketed and considered as part of ~~a future~~ the 2017 Comprehensive Plan amendment cycle.) The proposal includes zoning changes to increase development capacity and implement MHA in these areas. Current zoning is Single Family in much of the urban village boundary expansion areas. Land use patterns would be expected to change over time to allow a wider variety of housing types, including multifamily housing. These rezoned urban village expansion areas would experience a notable change in land use form and intensity over the study horizon and are analyzed in this EIS.

The following figures summarize the proposed urban village boundary expansions in the Action Alternatives. As noted above, the expansions vary in Alternative 2 and 3, according to whether or not Displacement Risk and Access to Opportunity were considered in the alternative, while the Preferred Alternative includes urban village boundary expansions to a full 10-minute walkshed from frequent transit nodes due to emphasis on locating more housing and jobs near transit.



Alternative 2



Alternative 3

Exhibit 2-17

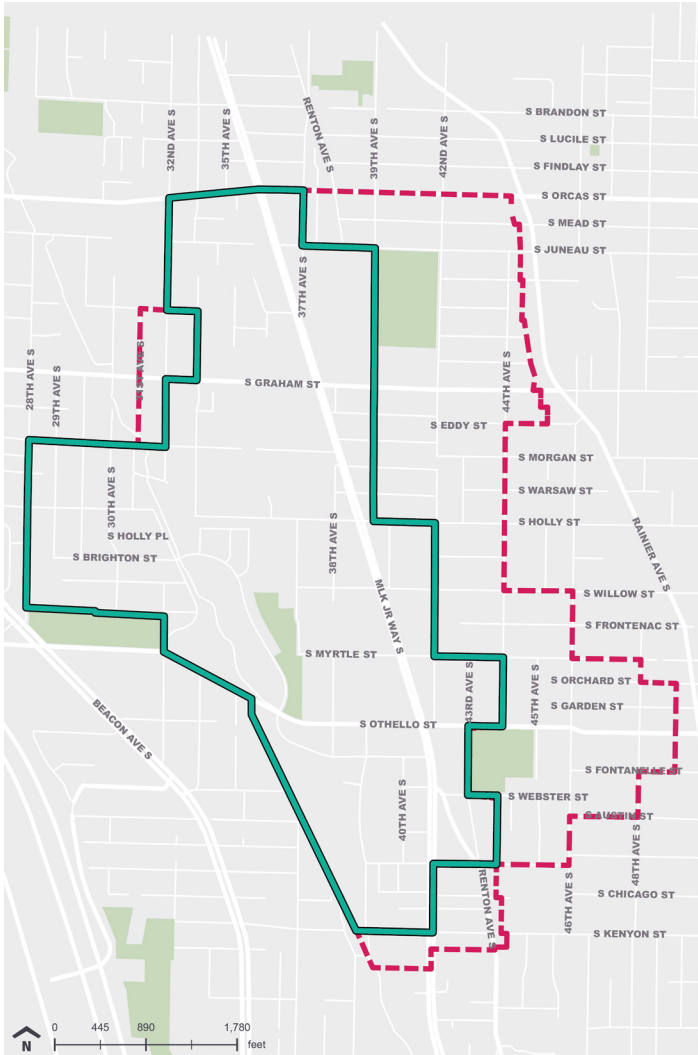
Proposed Urban Village Boundary Expansions Action Alternatives: Rainier Beach (High Displacement Risk and Low Access to Opportunity)

The Rainier Beach urban village boundary would expand by 70 acres in Alternative 2 and 16 acres in Alternative 3. The expansion area is near the light rail station at South Henderson Street. In Alternative 2 the expansion approximates a 10-minute walkshed from the transit station and in Alternative 3 the expansion is reduced to an approximate 5-minute walkshed.

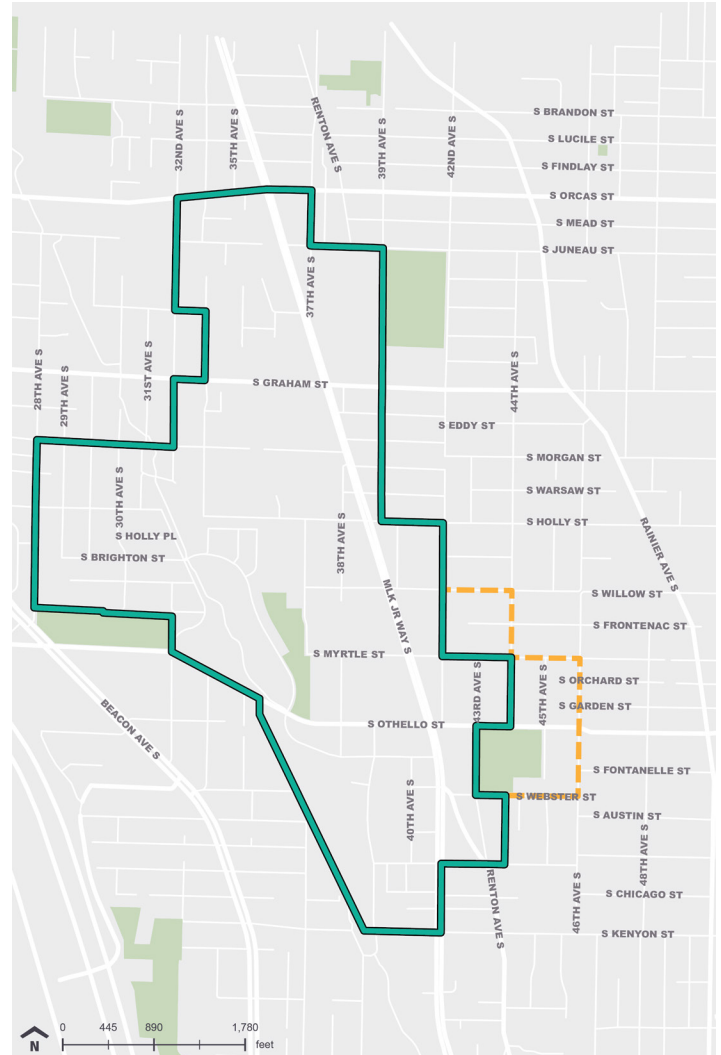
Source: City of Seattle, 2017.



Under the Preferred Alternative the Rainier Beach urban village boundary would expand by 49 acres, similar to Alternative 2. The expansion area is near the light rail station at South Henderson Street.



Alternative 2



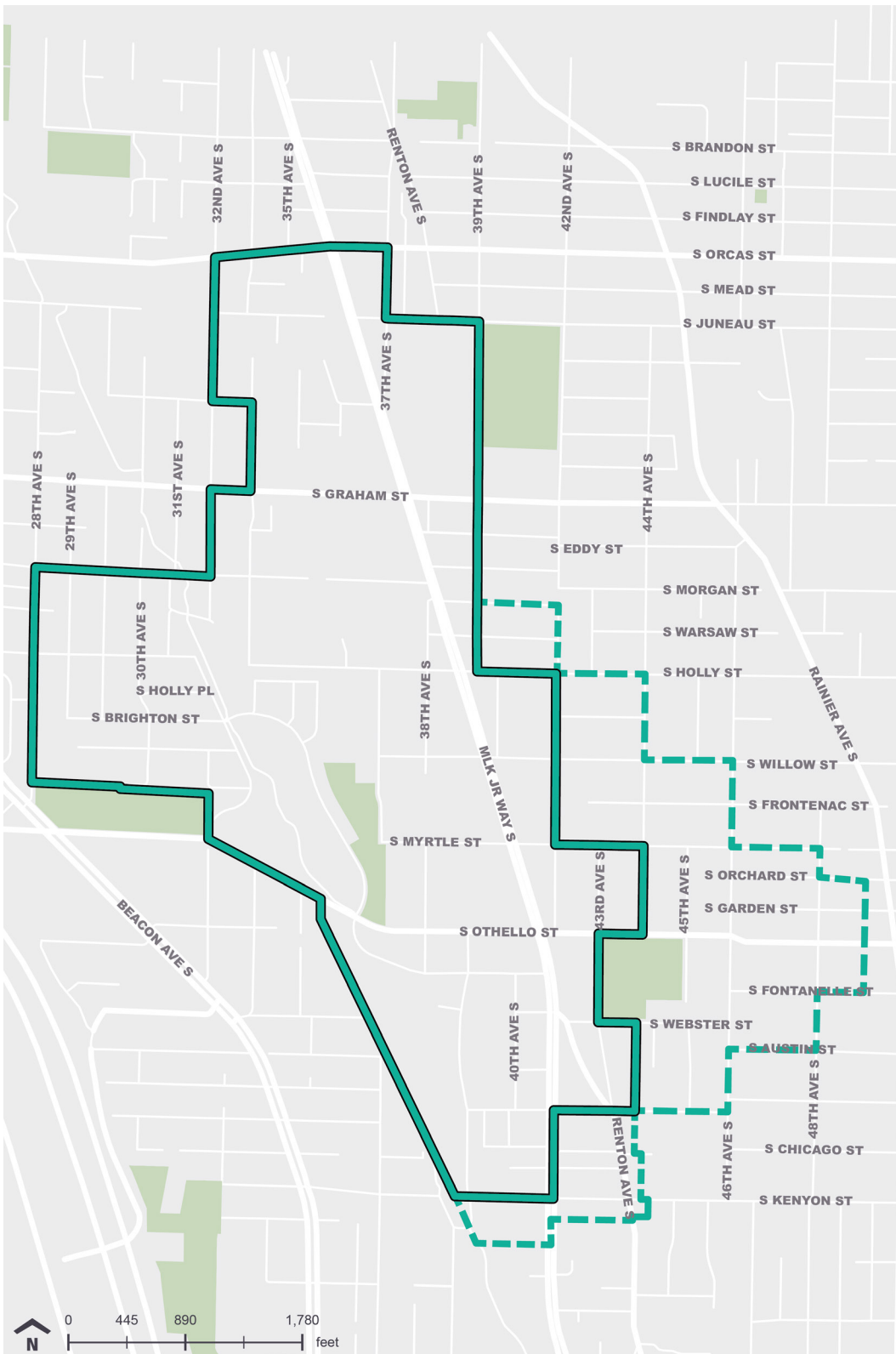
Alternative 3

Exhibit 2-18

Proposed Urban Village Boundary Expansions Action Alternatives: Othello (High Displacement Risk and Low Access to Opportunity)

The Othello Urban Village boundary would expand by 193 acres in Alternative 2 and 27 acres in Alternative 3. In Alternative 2 the expansion area is an approximate 10-minute walkshed near the existing light rail station at South Othello Street the planned future light rail station at South Graham Street. In Alternative 3, the expansion approximates a 5-minute walkshed from the existing light rail station at St Othello St only.

Source: City of Seattle, 2017.



Othello Preferred Alternative

Under the Preferred Alternative the Othello Urban Village boundary would expand by 102 acres. The expansion area is an approximate 10-minute walkshed near the existing light rail station at South Othello Street. No urban village boundary expansion is included in the Preferred Alternative at this time for the 10-minute walkshed from the planned future Graham St. light rail station.



Alternative 2



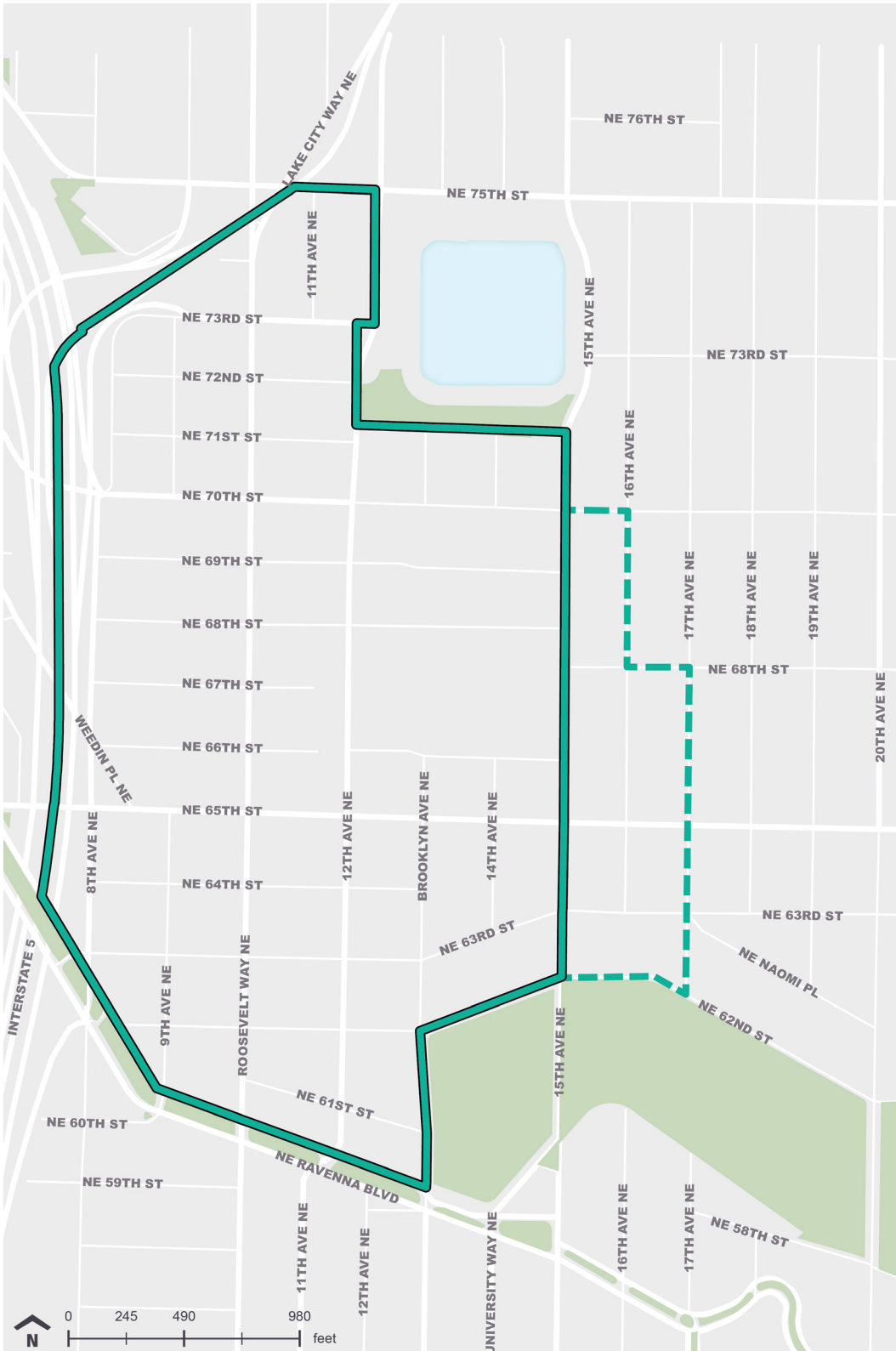
Alternative 3

Exhibit 2-19

Proposed Urban Village Boundary Expansions Action Alternatives: Roosevelt (Low Displacement Risk and High Access to Opportunity)

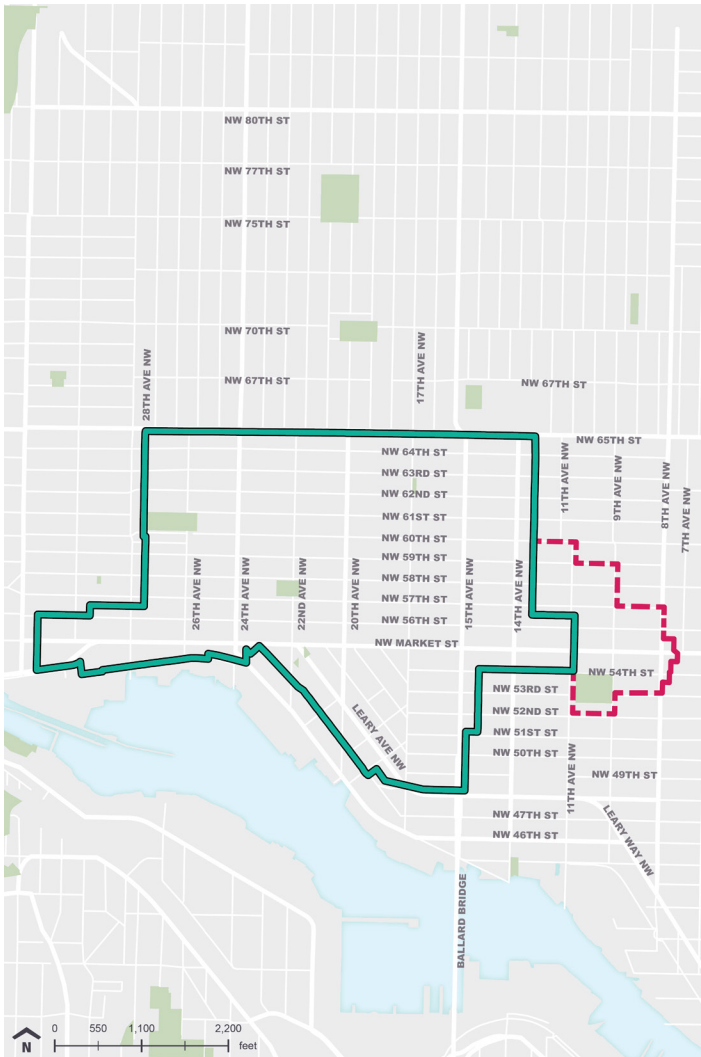
The Roosevelt Urban Village boundary would expand by four acres in Alternative 2 and 17 acres in Alternative 3. The expansion area is near the light rail station at NE 65th St. In Alternative 2 the expansion is smaller than the approximated 10-minute walkshed and includes only two blocks along the west side of 15th Ave NE. In Alternative 3, the expansion approximates a 10-minute walkshed and encompasses five blocks fronting NE 65th St west of 15th Ave NE.

Source: City of Seattle, 2017.

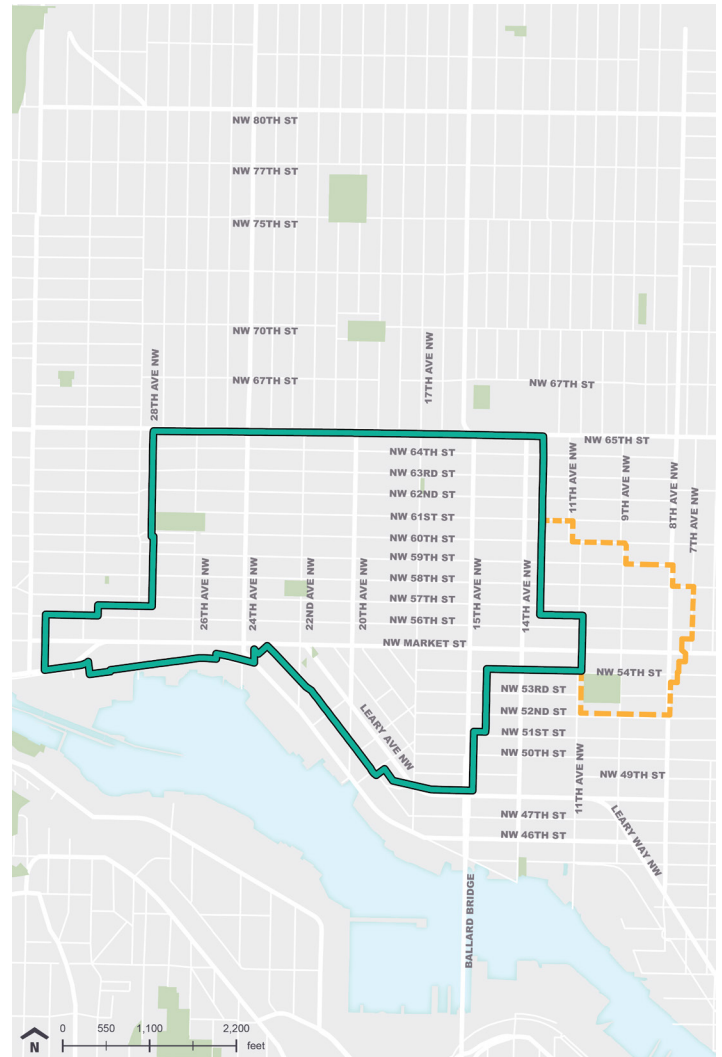


Roosevelt Preferred Alternative

Under the Preferred Alternative the Roosevelt Urban Village would expand by 14 acres. The expansion area is the approximate 10-minute walkshed from the light rail station that is scheduled to open in year 2020.



Alternative 2



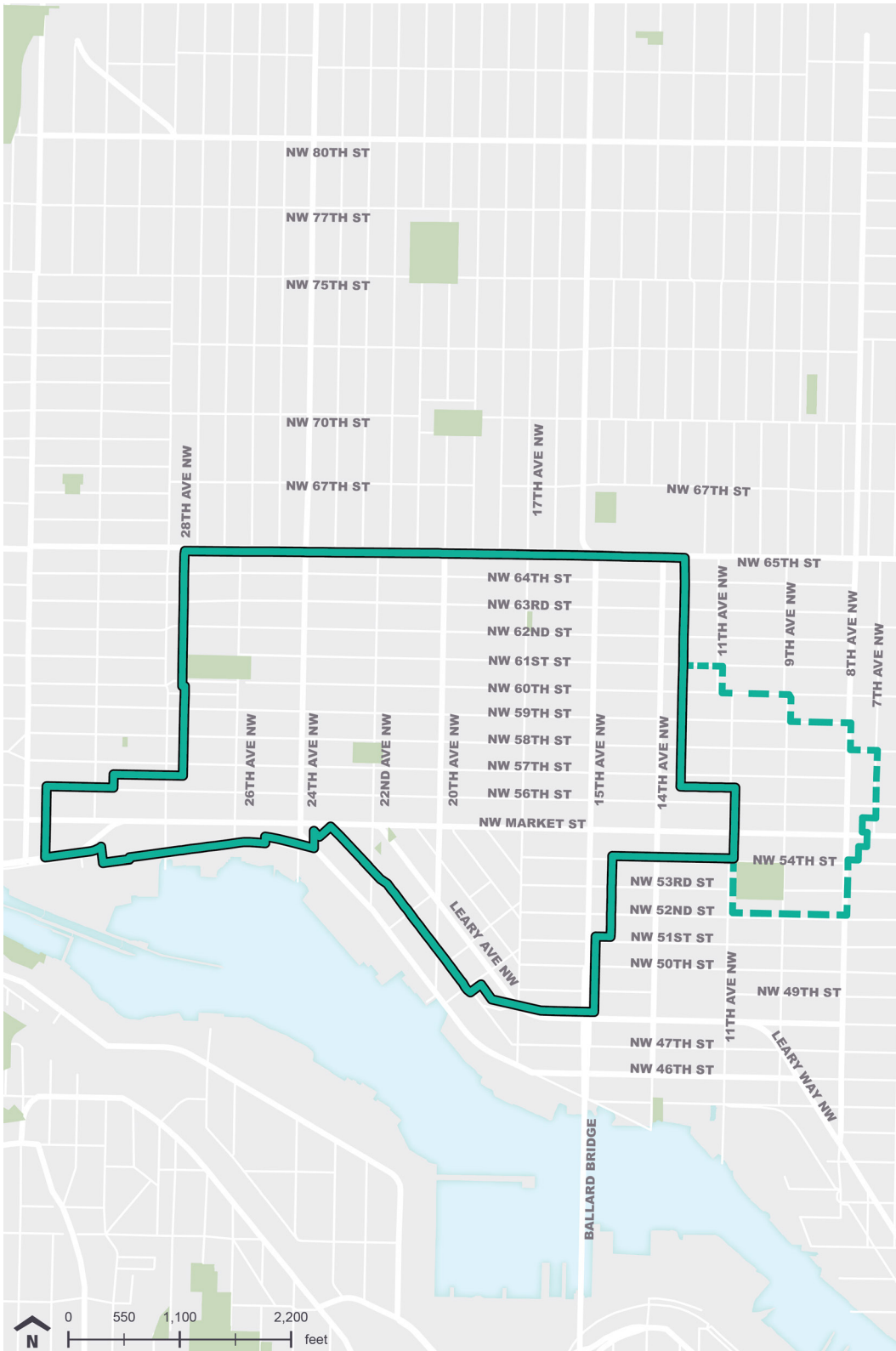
Alternative 3

Exhibit 2-20

Proposed Urban Village Boundary Expansions Action Alternatives: Ballard (Low Displacement Risk and High Access to Opportunity)

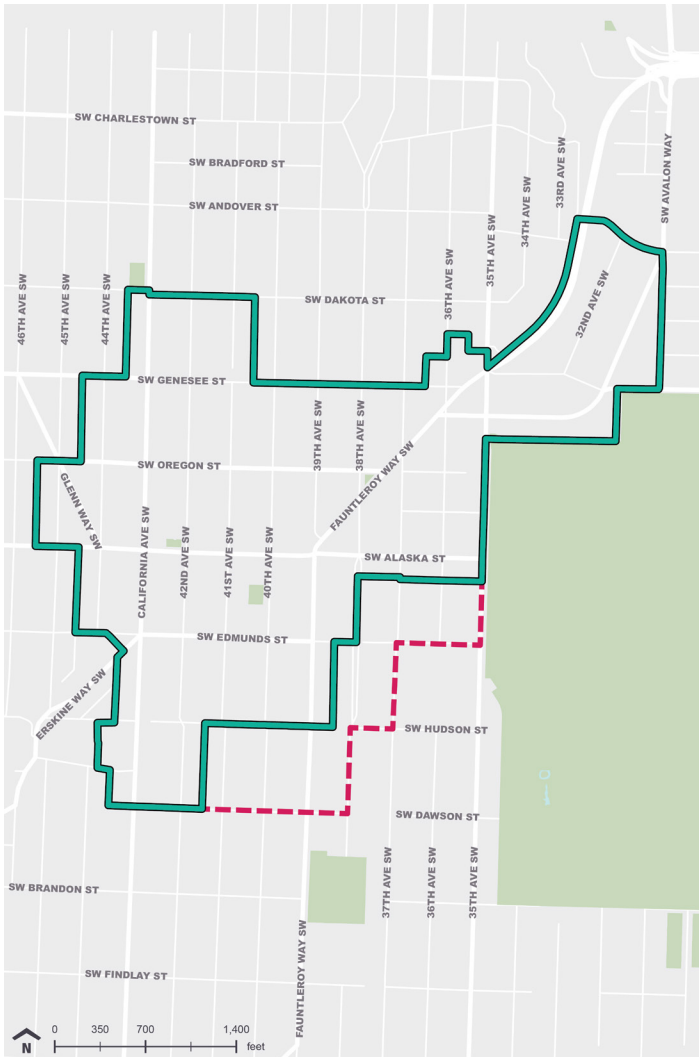
The Ballard Urban Village boundary would expand by 35 acres in Alternative 2 and 48 acres in Alternative 3. The expansion area surrounds existing high-frequency bus transit at 15th Ave NW and anticipates the future Ballard light rail station planned for this neighborhood. In Alternative 2, the expansion is smaller than the approximated 10-minute walkshed, and in Alternative 3 the expansion approximates a 10-minute walkshed. The expansion excludes land in the designated Manufacturing and Industrial Center.

Source: City of Seattle, 2017.

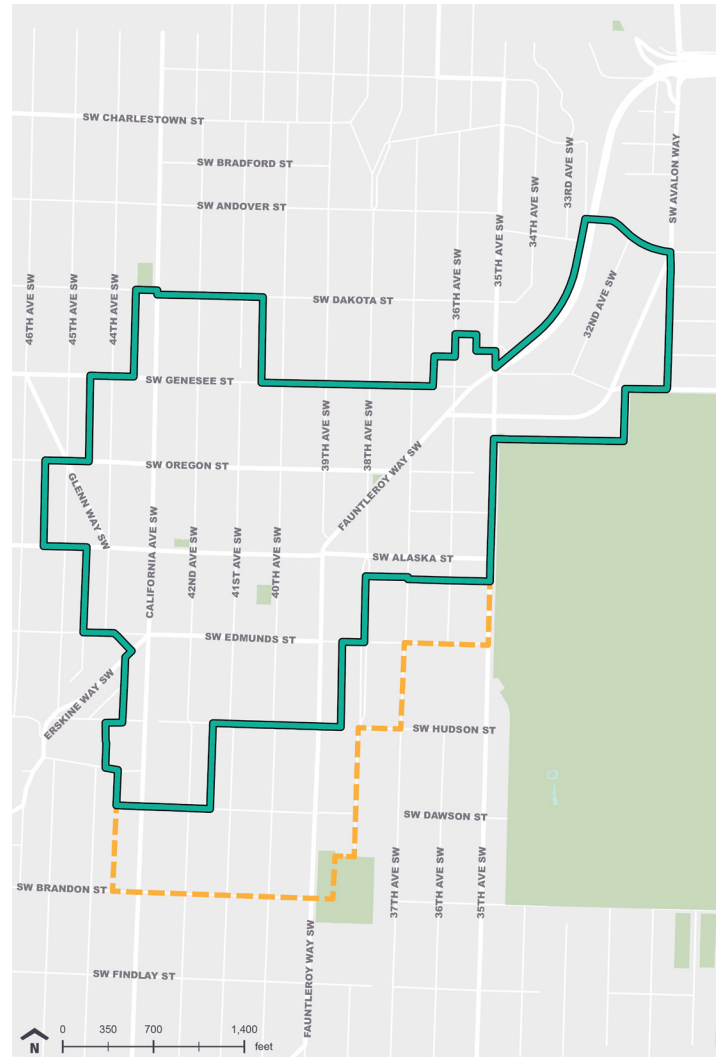


Ballard Preferred Alternative

Under the Preferred Alternative the Ballard Urban Village would expand by 48 acres, similar to Alternative 3. The expansion surrounds existing high-frequency bus transit at 15th Ave. NW and anticipates the future Ballard light rail station planned for this neighborhood.



Alternative 2



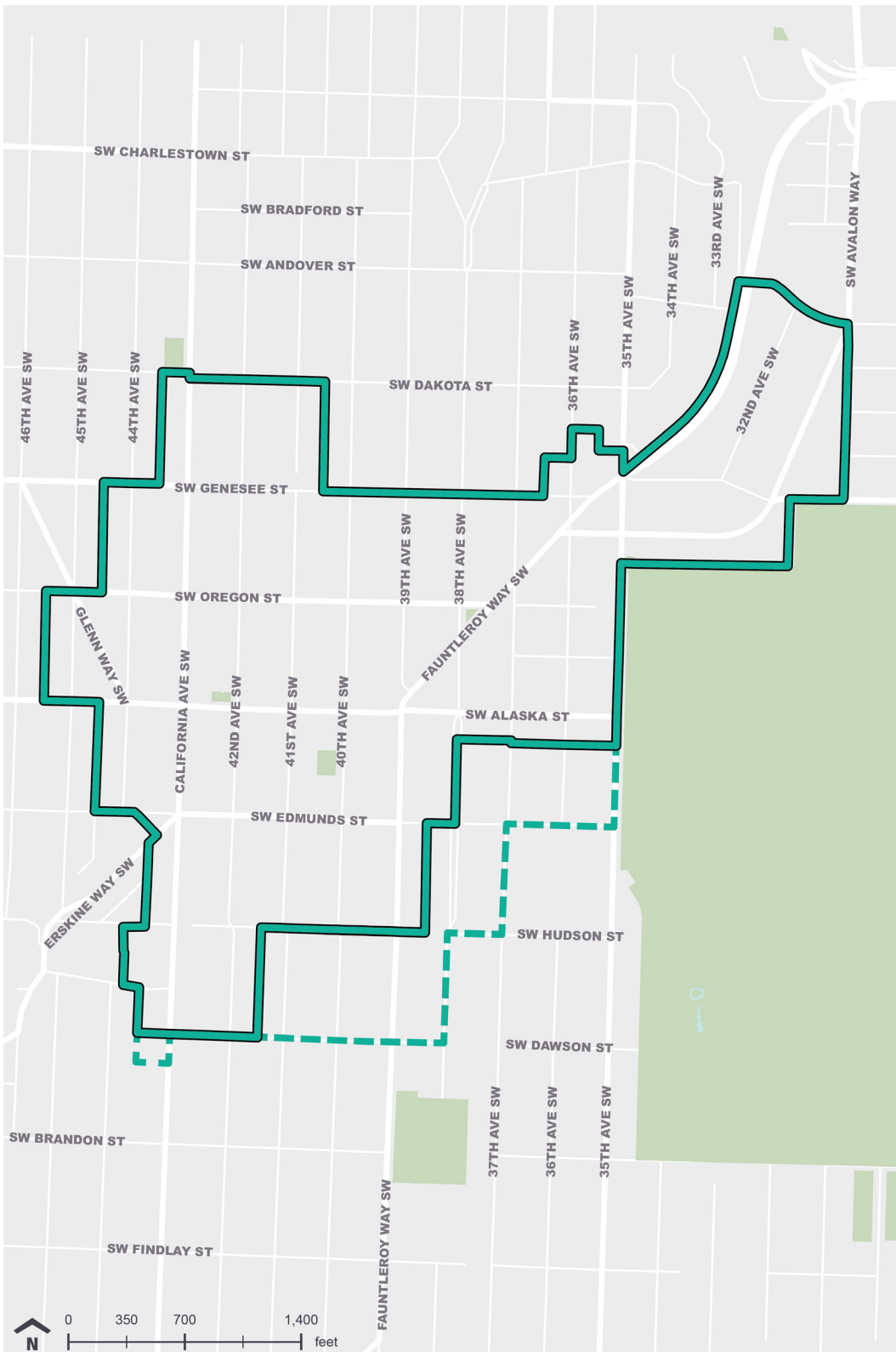
Alternative 3

Exhibit 2-21

Proposed Urban Village Boundary Expansions Action Alternatives: West Seattle Junction (Low Displacement Risk and High Access to Opportunity)

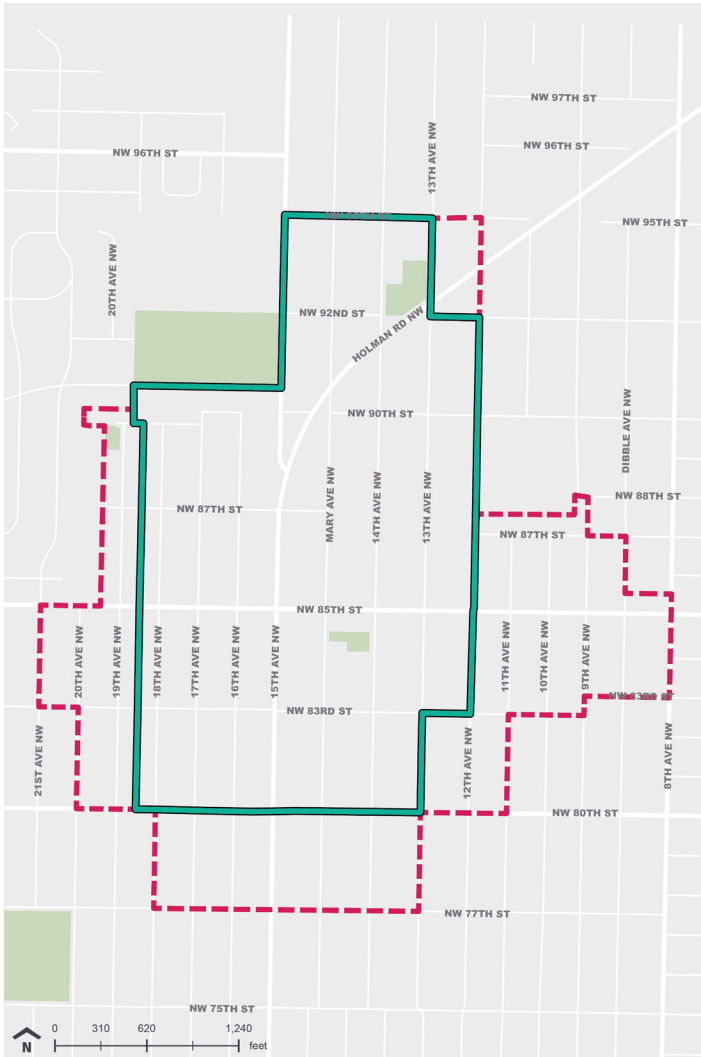
The West Seattle Junction Urban Village boundary would expand by 24 acres in Alternative 2 and 47 acres in Alternative 3. The expansion area is near the existing high-frequency bus transit service node at Fauntleroy Way SW and SW Alaska St and anticipates future addition of light rail in the neighborhood. In Alternative 2 the expansion is less than the approximated 10-minute walkshed from the transit node, and in Alternative 3 the expansion approximates the 10-minute walkshed.

Source: City of Seattle, 2017.

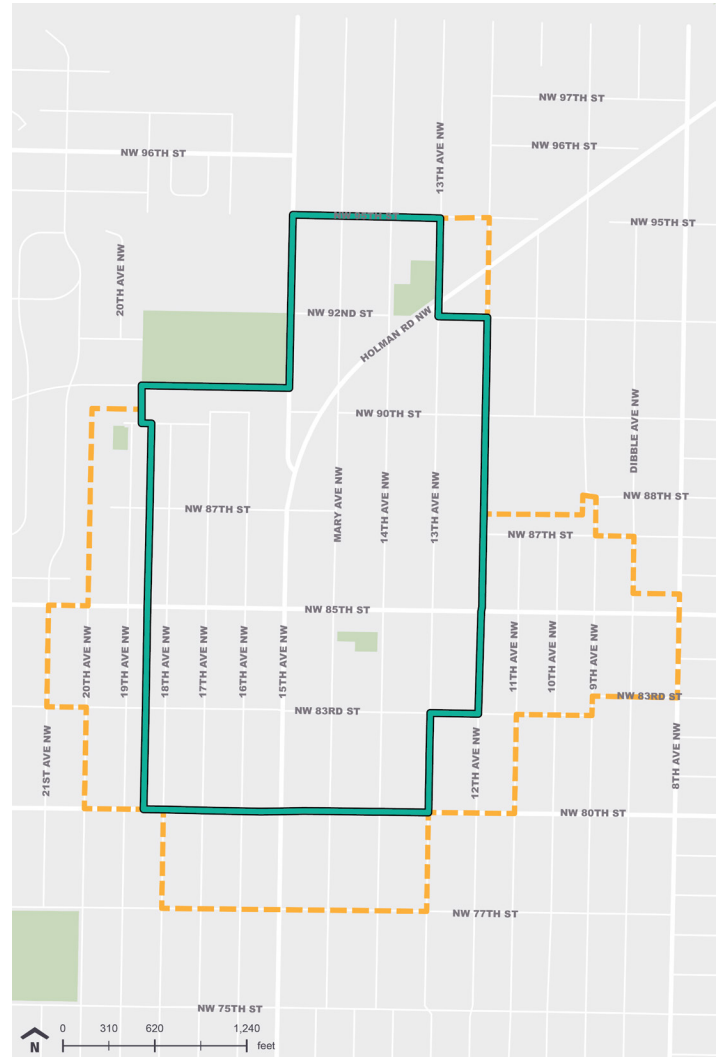


West Seattle Junction Preferred Alternative

Under the Preferred Alternative the West Seattle Junction Urban Village boundary would expand by 25 acres. The southern edge of the proposed expansion would end at S. Dawson St., which is smaller than the expansion studied in Alternative 3. The expansion is a more conservative estimation of a 10-minute walk from frequent transit, in recognition that planning for a future light rail station will be completed at a later time.



Alternative 2



Alternative 3

Exhibit 2-22

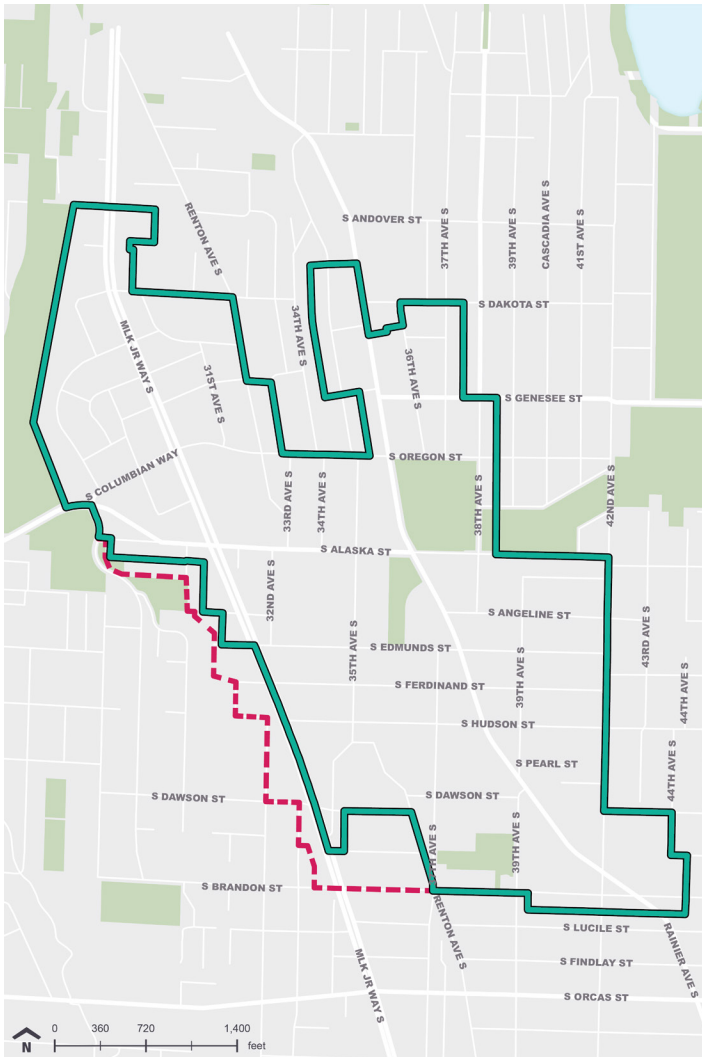
Proposed Urban Village Boundary Expansions Action Alternatives: Crown Hill (Low Displacement Risk and High Access to Opportunity)

The Crown Hill Urban Village boundary would expand by 80 acres in Alternative 2 and 84 acres in Alternative 3. The expansion area is near the existing high-frequency bus transit service node at NW 85th St and 15th Ave NW. The proposed expansion approximates the 10-minute walkshed in both alternatives but is reduced at 20th Ave NW and in Alternative 3.

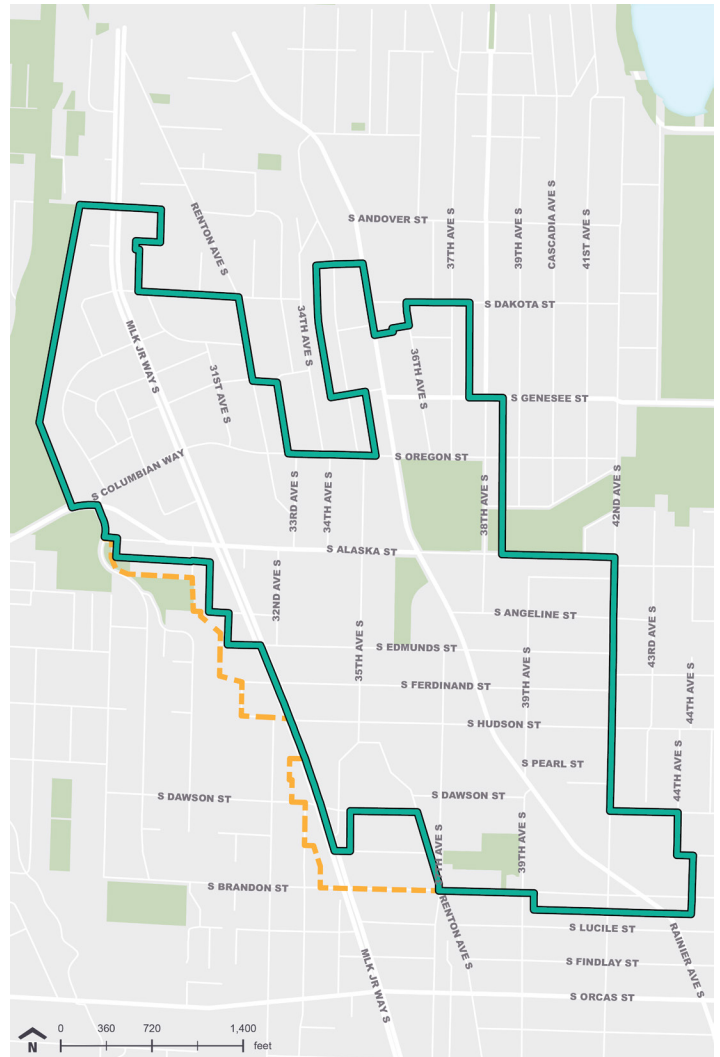
Source: City of Seattle, 2017.



Under the Preferred Alternative, the Crown Hill Urban Village boundary would expand by 78 acres. The expansion is similar to Alternative 2 in that parcels accessed off of 20th Ave. NW are not included in the expansion area.



Alternative 2



Alternative 3

Exhibit 2-23

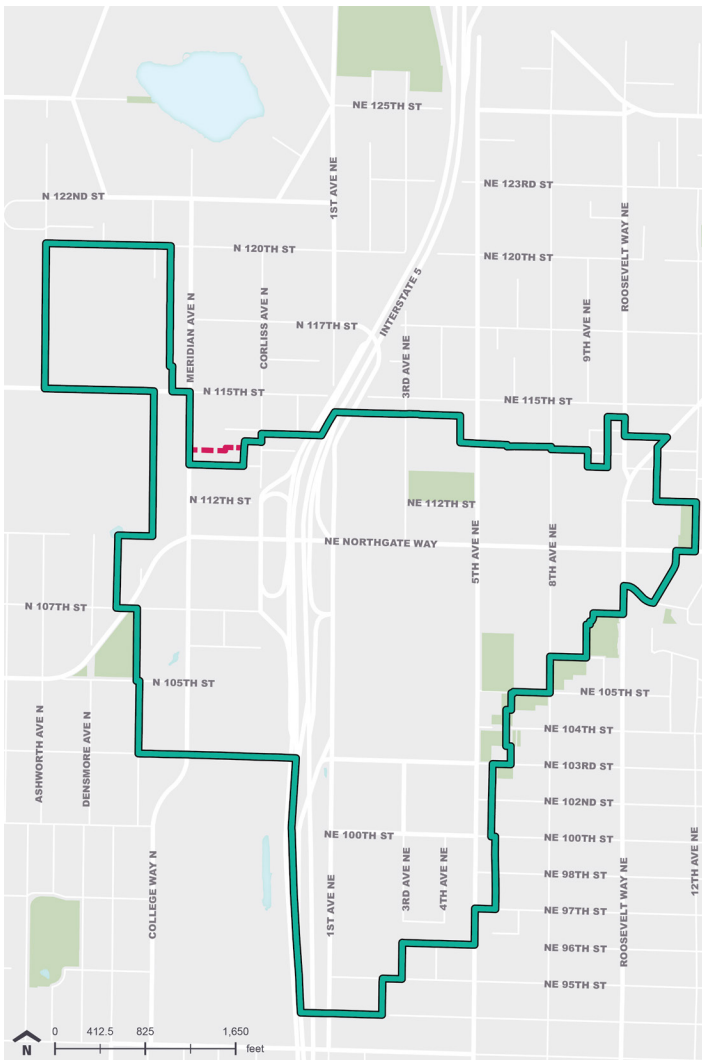
Proposed Urban Village Boundary Expansions Action Alternatives: Columbia City (High Displacement Risk and High Access to Opportunity)

The Columbia City Urban Village boundary would expand by 23 acres in Alternative 2 and 17 acres in Alternative 3. The expansion area is near the light rail station at S Edmunds St.

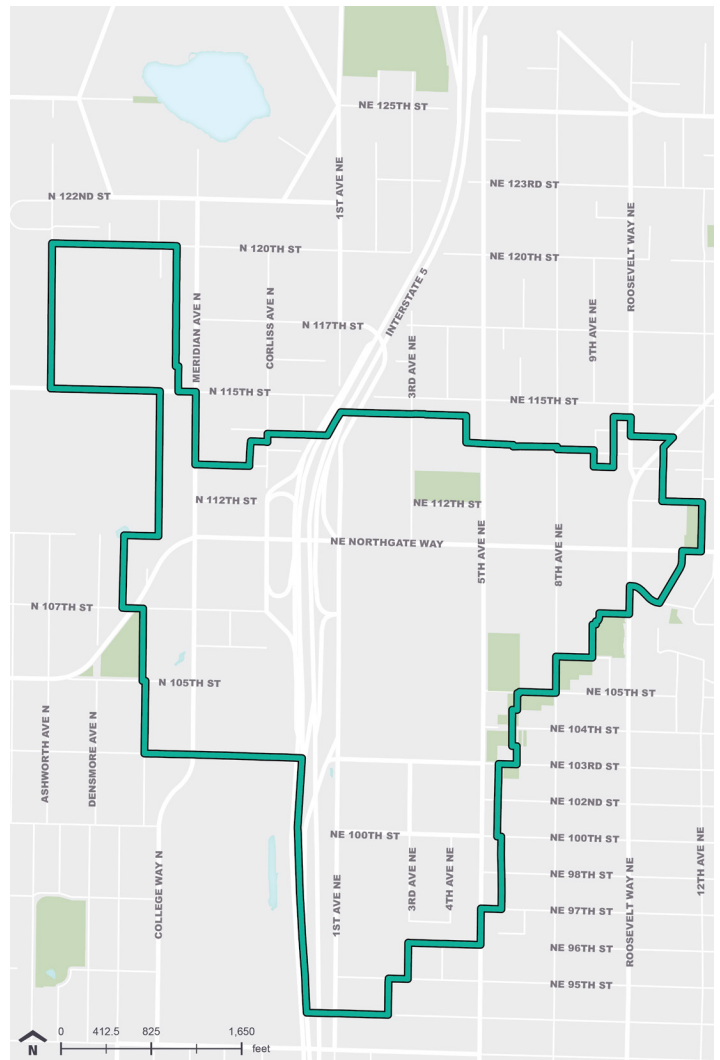
Source: City of Seattle, 2017.



Under the Preferred Alternative the Columbia City Urban Village boundary would expand by 16 acres. The proposed expansion area is modified slightly from Alternative 3 to exclude some parcels at the east edge of the urban village with environmentally critical areas.



Alternative 2



Alternative 3

Exhibit 2-24

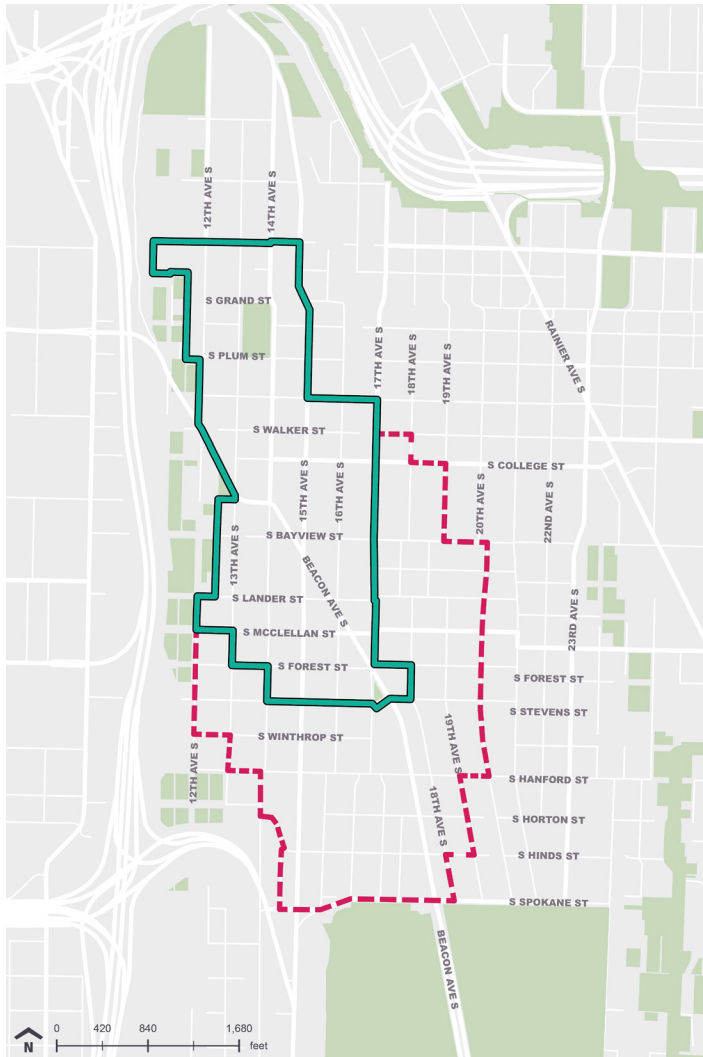
Proposed Urban Village Boundary Expansions Action Alternatives: Northgate (High Displacement Risk and High Access to Opportunity)

The Northgate Urban Center boundary would expand by three acres in Alternative 2 and zero acres in Alternative 3. The expansion area was not studied in the Seattle 2035 plan, but is studied in this EIS. It is near the existing high-frequency bus transit service and the light rail station under construction near the existing Northgate Transit Center. The proposed expansion considers adding a small area of existing Lowrise multifamily zoned land and an adjacent parcel in existing commercial use to the urban center.

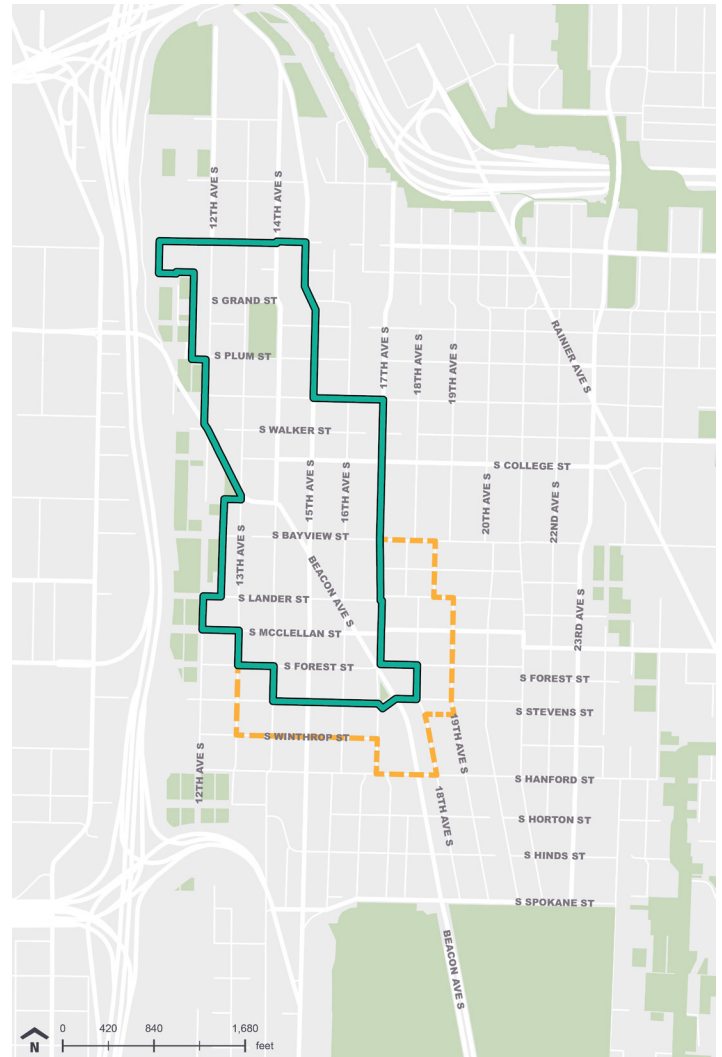
Source: City of Seattle, 2017.



The Northgate Urban Center boundary would not be expanded under the Preferred Alternative. Urban village boundary expansions that were not studied as a part of the Seattle 2035 Comprehensive Plan update are not included for any urban villages in the Preferred Alternative.



Alternative 2



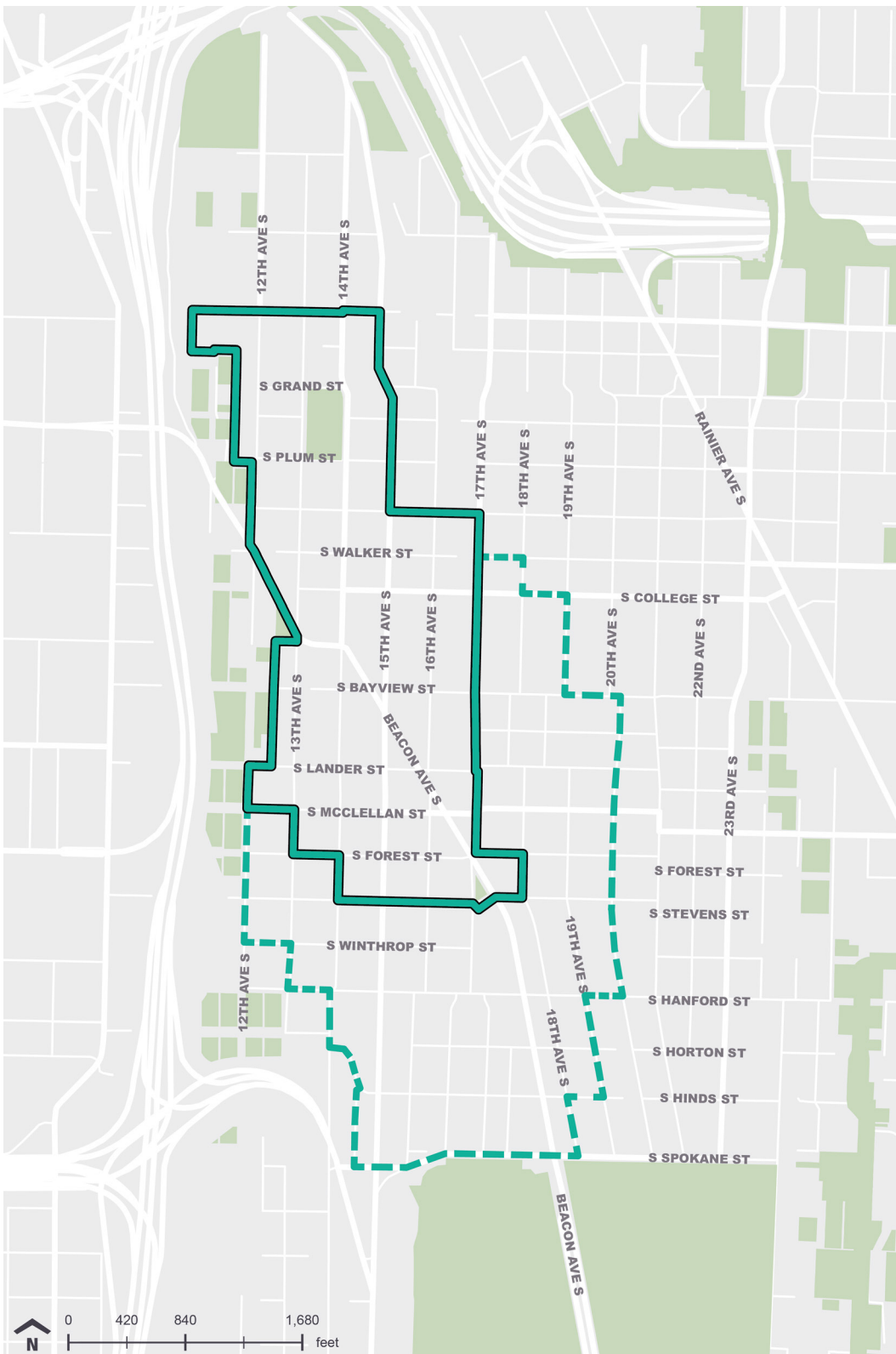
Alternative 3

Exhibit 2-25

Proposed Urban Village Boundary Expansions Action Alternatives: North Beacon Hill (High Displacement Risk and High Access to Opportunity)

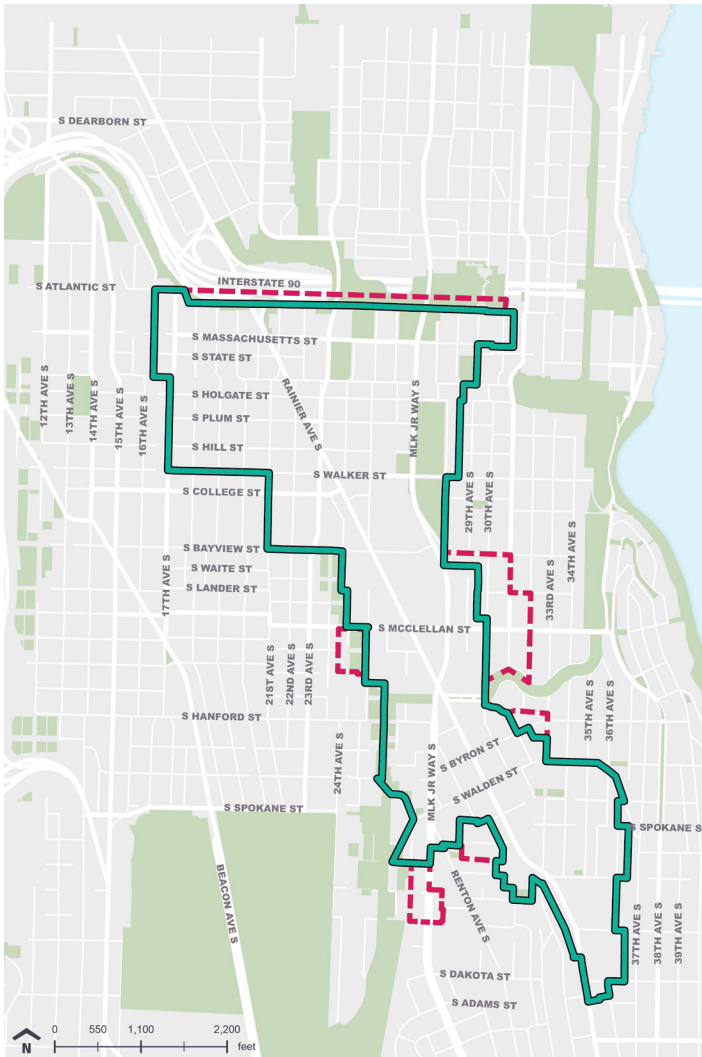
The North Beacon Hill Urban Village boundary would expand by 83 acres in Alternative 2 and 22 acres in Alternative 3. The expansion area is near the light rail station at S Lander St. In Alternative 2 the expansion approximates a 10-minute walkshed, and in Alternative 3 the expansion approximates a 5-minute walkshed.

Source: City of Seattle, 2017.

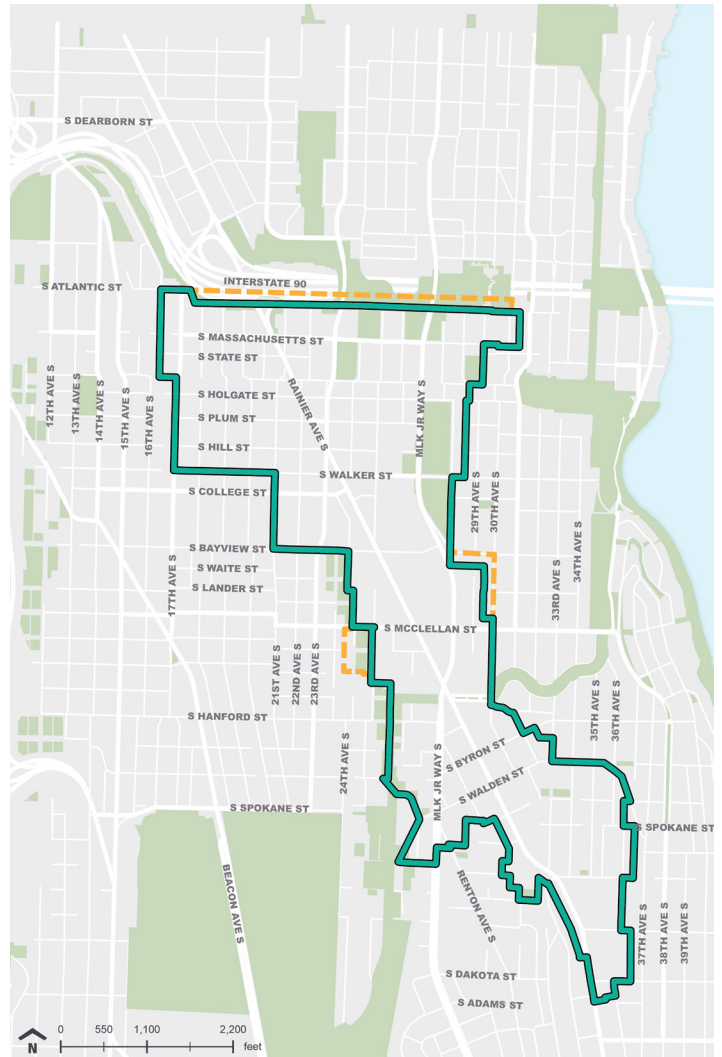


North Beacon Hill Preferred Alternative

Under the Preferred Alternative the North Beacon Hill Urban village boundary would expand by 83 acres, similar to Alternative 2. The expansion area is an approximate 10-minute walkshed from the light rail station at S. Lander St.



Alternative 2



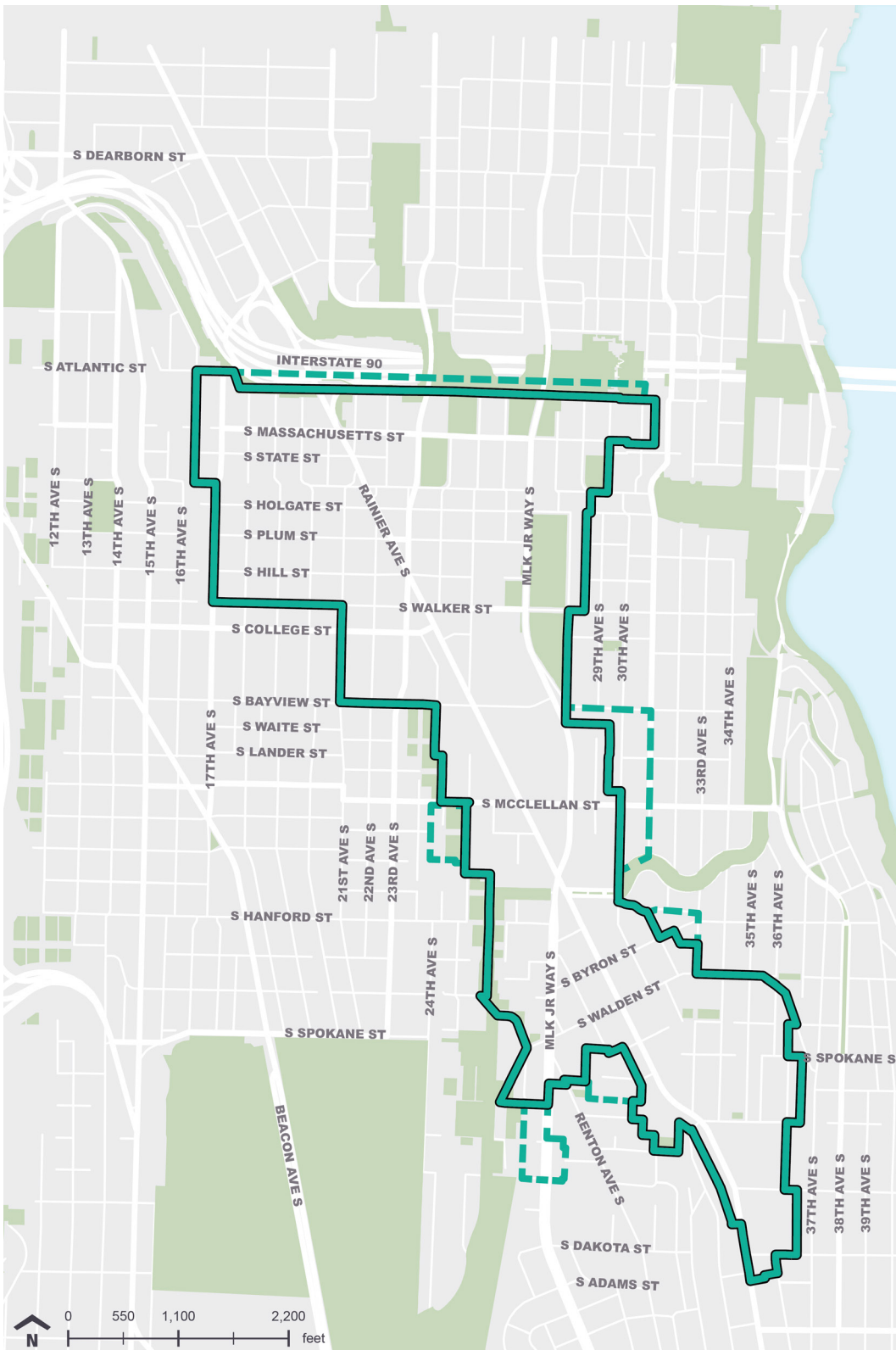
Alternative 3

Exhibit 2-26

Proposed Urban Village Boundary Expansions Action Alternatives: North Rainier (High Displacement Risk and High Access to Opportunity)

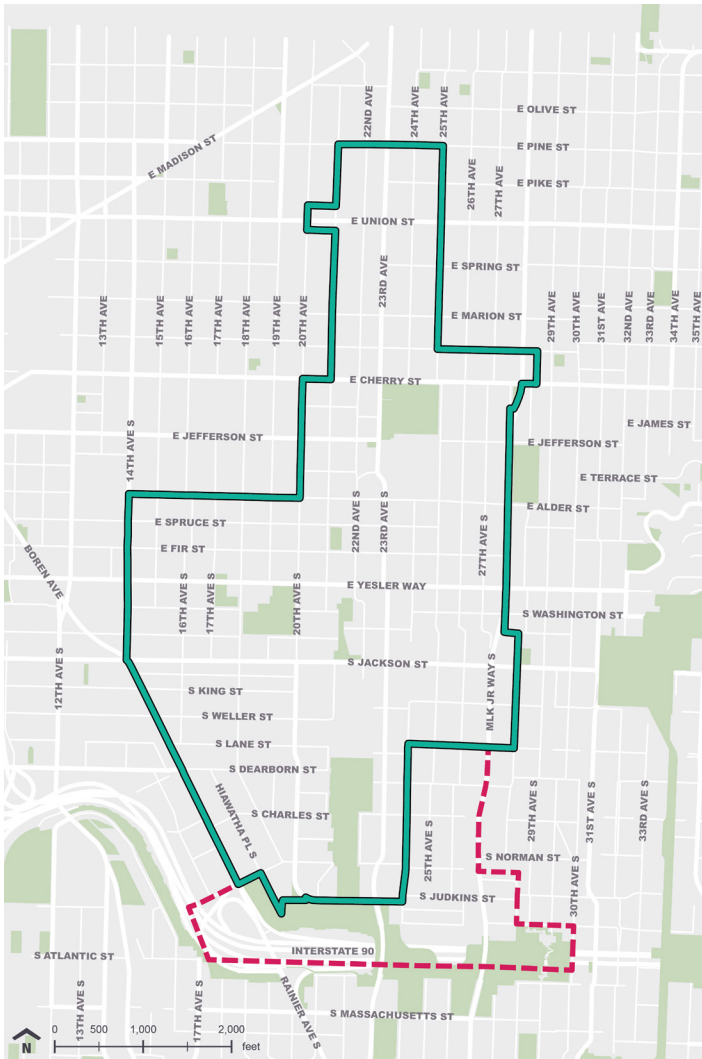
The North Beacon-Hill Rainier Urban Village boundary would expand by 38 acres in Alternative 2 and 12 acres in Alternative 3. The expansion area is near the Mt Baker light rail station at S McClellan St and in the area adjacent to Interstate 90 where a future Judkins light rail station is under construction. In Alternative 2 the expansion approximates a 10-minute walkshed, and in Alternative 3 the expansion approximates a 5-minute walkshed.

Source: City of Seattle, 2017.

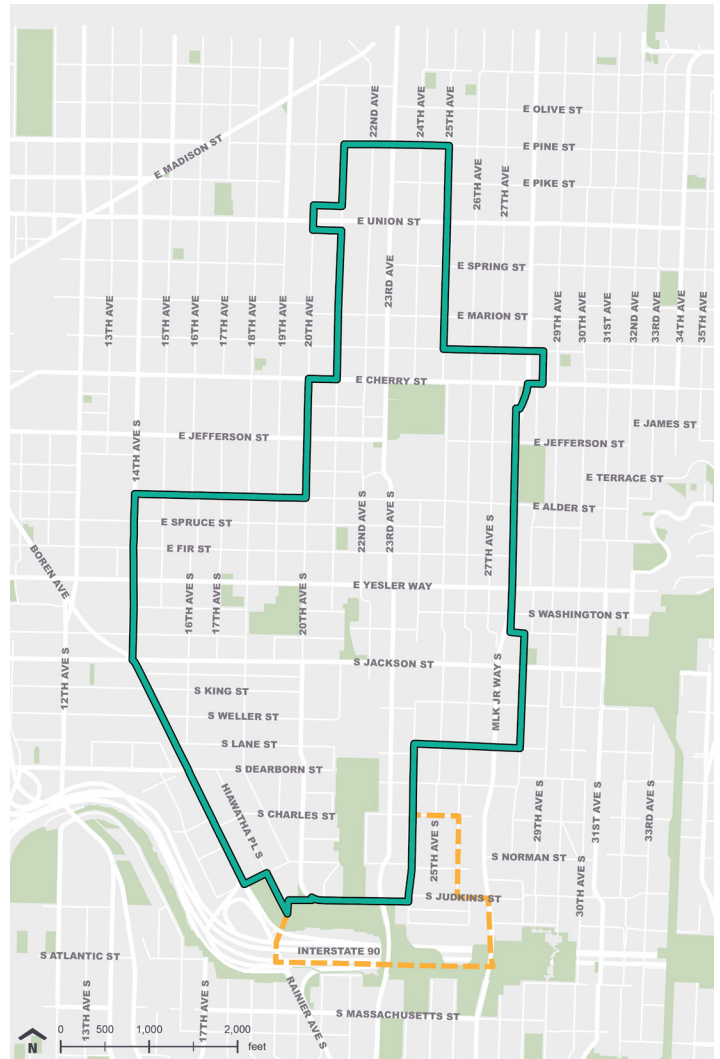


North Rainier Preferred Alternative

Under the Preferred Alternative the North Rainier Urban Village would expand by 37 acres, the approximate 10-minute walkshed from the Mt. Baker light rail station, similar to Alternative 2.



Alternative 2



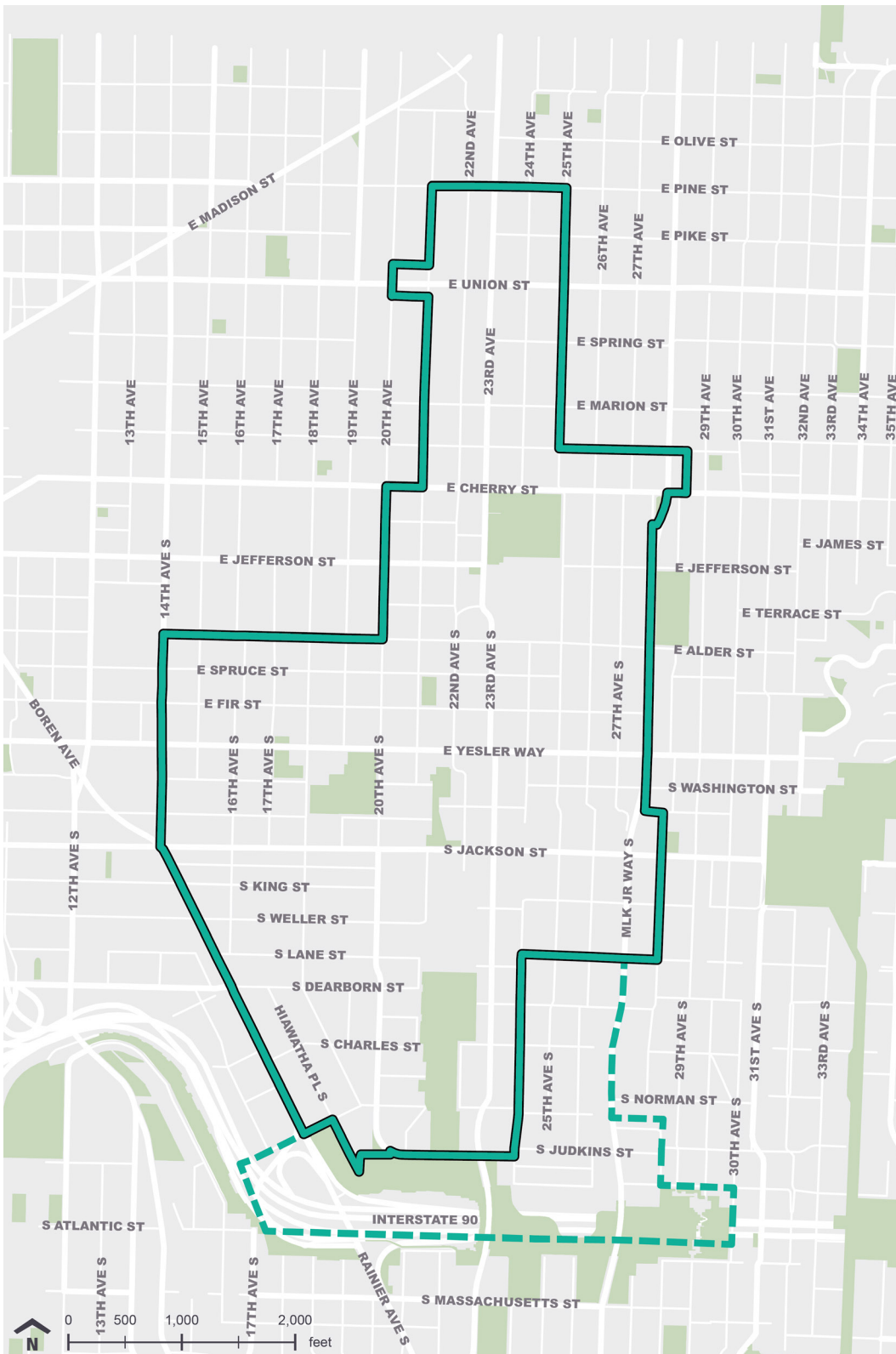
Alternative 3

Exhibit 2-27

Proposed Urban Village Boundary Expansions Action Alternatives: 23rd & Union-Jackson (High Displacement Risk and High Access to Opportunity)

The 23rd & Union-Jackson Urban Village boundary would expand by 40 acres in Alternative 2 and 18 acres in Alternative 3. The expansion area is adjacent to Interstate 90 where a future Judkins light rail station is under construction. In Alternative 2 the expansion approximates a 10-minute walkshed, and in Alternative 3 the expansion approximates a 5-minute walkshed.

Source: City of Seattle, 2017.



23rd & Union-Jackson Preferred Alternative

Under the Preferred Alternative the 23rd & Union-Jackson urban village boundary would expand by 40 acres, an approximate 10-minute walkshed from the future Judkins light rail station expected to open in year 2023.

2.4 ALTERNATIVES CONSIDERED BUT NOT INCLUDED IN DETAILED ANALYSIS

This section identifies several additional alternatives that were considered for possible inclusion in the Draft EIS. Based on preliminary analysis, however, it was determined that they did not meet the project's objectives, were speculative, or would result in greater adverse impacts. Therefore, the EIS does not include them.

INCREASED MHA PERFORMANCE AND PAYMENT REQUIREMENTS

A version of MHA implementation with significantly increased MHA payment and performance requirements was considered. There was interest by some community members in the scoping phase, citing housing programs in peer cities such as New York and Boston, to review significantly higher MHA payment and performance requirements. The City reviewed the potential to evaluate an alternative with markedly higher MHA requirements, in the range of a 25 percent MHA performance requirement. Based on housing market analyses, we determined that, in the Seattle market, in some cases the currently proposed MHA amounts are at or very near the maximum supportable amount. Therefore, an alternative with markedly increased MHA amounts would be likely to negatively affect real estate markets and undermine economic feasibility for many projects, in turn depressing the housing market and limiting the affordable units generated. Based on these considerations, this alternative approach was excluded from further analysis in the EIS. The analysis used to reach this conclusion is summarized below

During formulation of the structure and payment and performance requirements for MHA, stakeholders—including experts from for-profit and non-profit development companies in the Seattle real estate market—reviewed general scenarios and models and engaged in extensive deliberation of MHA amounts. Their analysis determined that MHA performance requirements of five to seven percent were amounts that could be supported without negatively impacting development feasibility. Since that time, new variants of the MHA structure were added to create tiers that includes higher requirements, up to 11 percent for some capacity increases, and beyond amounts stakeholder experts viewed as supportable.

In 2016, an independent economic analysis conducted by Community Attributes Incorporated (CAI) a third-party consultant with expertise in development economics, evaluated the proposed development capacity increases and MHA requirements and released a technical memorandum in November 2016. The analysis calculated residual land values for 23 development prototypes in a variety of zones and market areas with the MHA rates for the (M) tier, and provided information about what prices land is currently traded at in those same general areas. Based on a comparison of theoretical land values to current land values, it determined that 19 of prototypes in strong market areas and 15 in medium market areas yielded positive feasibility results with baseline construction costs. Using the proformas developed by CAI, increased MHA requirements of 25 percent performance were tested. In this test, the number of feasible prototypes dropped to nine of 23 in strong market areas and six of 22 in medium market areas. It's important to note that development conditions vary widely from site to site, and the analysis is a general guide and not a definitive measure of feasible. However, the finding that a 25 percent requirement would render most development prototypes in strong and moderately strong markets infeasible given prevailing land prices suggests that an alternative with this approach would not plausibly achieve the proposed objectives.

VARYING GEOGRAPHIC DISTRIBUTION OF MHA AFFORDABLE HOUSING PAYMENT UNITS

Alternatives 2 and 3 distribute affordable housing units generated by in lieu MHA payments, and which will be developed by or for the City's Office of Housing (OH), in locations proportionate to the area's share of anticipated citywide residential growth. An alternative was considered that would concentrate greater or lesser numbers of the MHA units generated from payment according to some other combination of variables, which could include land costs, risk of displacement or other financial and policy factors.

OH makes its locational decisions guided by a set of criteria in its Council adopted Housing Funding Policies, which consider Comprehensive Plan policies as well as factors established in MHA framework legislation. OH must compete with the private market to acquire sites for development in Seattle's real estate market. Project locations are opportunistic, because they are dependent on lands that become available for sale. These factors make the specific pattern for distribution of housing units generated by MHA payments unpredictable. It was concluded, therefore, that an alternative that hypothesized concentrations of units generated

by MHA payments in any specific urban village or geographic location for the purposes of analysis would be extremely speculative.

Any project proposed by the OH, including projects constructed with payments generated by MHA, would be subject to project-level SEPA review. This review would consider how a project's location relates to the OH's own site investment criteria and to Comprehensive Plan policies.

INCENTIVE ZONING FOR AFFORDABLE HOUSING

As noted, the City has an existing voluntary incentive zoning for affordable housing that is in place in certain areas including portions of the study area and codified in SMC Chapter 23.58.A. If enacted, MHA would replace existing incentive zoning for affordable housing. Incentive zoning is not anticipated to produce a quantity of rent and income restricted units that would meet the objective of the proposed action. However, if MHA were not enacted, the City could pursue an incentive zoning approach. The Land Use Code and zoning changes evaluated in this EIS could be applied with incentive zoning.

MORE GENERAL ANALYSIS

Implementing MHA is a non-project action that would require certain future development to include or contribute to affordable housing, and make other land use regulatory changes described in this chapter. Due to the large study area, range of conditions, and time horizon it is difficult to anticipate precise specific patterns of household and job growth that could occur. More generalized alternatives for analysis were considered, which would have estimated growth without detailed GIS and development capacity modelling, and would not have included parcel-specific zoning maps contained in Appendix H. A more general analysis would have assumed no difference between the no action and action alternatives in the minimum 20-year growth estimation of the *Seattle 2035* plan. Or, a more general analysis would have made hypothetical assumptions about growth in urban villages. Due to scoping comments requesting detailed local analysis, and to provide more exacting estimations of potential growth, such generalized methods of analysis for the alternatives were discarded.

3



AFFECTED ENVIRONMENT, SIGNIFICANT IMPACTS, AND MITIGATION MEASURES.

This chapter describes the affected environment, potential impacts, and mitigation measures for the following topics:

- Section 3.1 Housing and Socioeconomics
- Section 3.2 Land Use
- Section 3.3 Aesthetics
- Section 3.4 Transportation
- Section 3.5 Historic Resources
- Section 3.6 Biological Resources
- Section 3.7 Open Space and Recreation
- Section 3.8 Public Services and Utilities
- Section 3.9 Air Quality and Greenhouse Gas Emissions

Following a description of current conditions (affected environment) the analysis compares and contrasts the alternatives programmatically and provides mitigation measures for identified impacts. It also summarizes whether there are significant unavoidable adverse impacts.



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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.

3.1



HOUSING AND SOCIOECONOMICS.

3.1.1 AFFECTED ENVIRONMENT

This section addresses population and housing, both citywide and by neighborhood, including socioeconomic characteristics of households and housing affordability trends. It also reviews the historical context of racial segregation in Seattle. Next, it examines recent ~~historical~~ evidence of physical and economic displacement, wherein households are compelled to move from their homes involuntarily due to the termination of their lease or rising housing costs. Finally, this section evaluates whether there have been any recent historical relationships between displacement and new residential development. This review of the affected environment serves as a baseline for analyzing and comparing the impacts of the three alternatives in 3.1.2 Impacts.

POPULATION AND HOUSEHOLD CHARACTERISTICS

Residents

The Washington State Office of Financial Management (OFM) estimates that Seattle has about 686,800 residents and 325,000 households as of April 2016. Since 2010, the population of Seattle is estimated to have grown by more than 78,000, an increase of nearly 13 percent over six years (OFM 2016). During the same period, the remainder of King County grew by only seven percent.

Job Growth and In-Migration

Much of the recent population growth in Seattle can be attributed to rapid in-migration. This is consistent with the city's role as a regional employment and growth center. The American Community Survey (ACS) estimates that more than 55,500 residents moved to Seattle from outside King County during the previous

New to the FEIS

Historical Context of Racial Segregation, including associated footnotes and Exhibit 3.1–1, is a new section since issuance of the DEIS

year.¹ Among these in-migrants, 31,600 moved to Seattle from another state and 9,000 from abroad. Much of this in-migration is fueled by Seattle’s rapid job growth in recent years, particularly in the technology sector. The City estimates that 87,600 jobs were added citywide between 2010 and 2015 (City of Seattle 2016).

Historical Context of Racial Segregation

A review of historical racial segregation in Seattle provides context for discussion of current demographic patterns and trends. Before the U.S. Congress passed the Fair Housing Act in 1968, realtors and property owners could legally discriminate because of race and national origin. The Puget Sound Regional Council’s (PSRC) 2014 Fair Housing Equity Assessment summarizes historical practices that created segregation in Seattle and elsewhere in the central Puget Sound region during the last century. As PSRC notes, “As in other parts of the country, the central Puget Sound region has a history of segregation based on race, national origin, and other characteristics. Practices such as ‘red lining’ and restrictive covenants on property have had long-lasting impacts on neighborhoods.” (PSRC, 2014)

Many communities, including the International District and Central Area in Seattle, were shaped by racially restrictive covenants and redlining. According to Silva (2009), “[t]he popular use of racially restrictive covenants emerged after 1917, when the U.S. Supreme Court deemed city segregation ordinances illegal.”² However, in the aftermath of the ruling it became popular for private deeds and developer plat maps to include terms that prevented people of minority races, religions, and ethnicities from purchasing a home. Courts determined these forms of exclusion legal at the time because individuals entering into covenant agreements did so of their own volition, whereas segregation ordinances were propagated at state or municipal levels. In Seattle, these covenants were common in neighborhoods where today a large majority of the population is White. Examples include Madison Park, Queen Anne, and Magnolia (Silva, 2009).

¹ This finding is based on survey data collected between 2011 and 2015. Thus, the estimate reflects the average number of people who moved to Seattle from a location outside of King County per year during this period. These figures represent in-migration only. During the same period, residents also moved out of Seattle. For King County as a whole, the estimated yearly net migration (in-migration minus out-migration) for this period was nearly 14,901 (OFM 2016). However, the number has been increasing over time. Estimated net migration from 2015–2016 was 39,168. Estimates for residential net migration for Seattle only are not available.

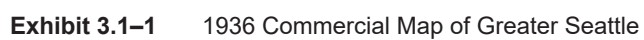
² Nevertheless, even following the Supreme Court’s ruling, the use of zoning in the United States for purposes of racial segregation persisted for several decades (Rothstein 2017).

The National Housing Act of 1934 also contributed to the problem of racial segregation. According to Silva (2009) “The Housing Act introduced the practice of “redlining,” or drawing lines on city maps delineating ideal geographic areas for bank investment and the sale of mortgages. Areas blocked off by redlining were considered risky for mortgage support, and lenders were discouraged from financing property in those areas.” This legislation resulted in intensified racial segregation. Exhibit 3.1–1 is a Seattle real estate map from 1936 that illustrates the mortgage rating areas, which assigned a rating of “definitely declining” or “hazardous” to areas of the city home to racial and ethnic minority populations such as the Central Area, Beacon Hill, and Rainier Valley.

During this time, the Federal Housing Administration (FHA) also institutionalized racism through a practice of denying mortgages based on a borrower’s race and ethnicity. Its 1938 *Underwriting Manual* included blatant racial provisions discouraging financing to certain “inharmonious racial groups” or where a change in racial occupancy could lead to instability and reduced value.

Due to these policies, racial and ethnic minority populations in Seattle typically had difficulty obtaining housing in highly rated neighborhoods and an easier time obtaining housing in the central neighborhoods, such as the Central Area, Beacon Hill, and Rainier Valley. As described in the Seattle Municipal Archives, the African American population in Seattle increased greatly between 1940 and 1960, but their growth was mainly confined to the Central Area due to a combination of restrictive covenants, redlining, and realtors’ practice of not showing houses in white neighborhoods to people of color (City of Seattle, n.d.).

Various Asian-American populations in Seattle have also experienced overt segregation. In 1886, White Seattleites rioted in opposition to an influx of Chinese workers, forcing the expulsion of some 350 Chinese men, and many others left voluntarily. (Schwantes 1982). However, immigration of Chinese population continued in the latter part of the 19th century and early 20th century. Many Chinese immigrants settled in areas south of Pioneer Square, and were later followed by immigrations of Japanese and Filipino populations. Unwelcome in other areas of the city, distinct and vibrant communities of Filipino, Chinese, and Japanese immigrants formed by the 1930’s in and around areas known today as the Chinatown/International District. In a later instance of overt segregation, the Federal Government relocated and interned many Japanese in Seattle during World War II, leading to largescale abandonment of Seattle’s “Japantown” community by Japanese populations. And the installation of Interstate 5 during the 1960’s through the International District had severe destabilizing effects on the neighborhood. Then, in 1975, Washington State participated in the resettlement of refugees from Vietnam, followed by a second wave of southeast Asian immigrants from Cambodia, Laos, and other areas of Southeast Asia. In the following years, many settled or began businesses just



west of the new I-5 in an area then characterized by the impacts of major construction and low rents, that is today known as Little Saigon.

Native American populations were also severely discriminated against in Seattle's past, and segregated to certain areas or removed from the city completely. The City of Seattle is Native land of the Coast Salish people, including the Duwamish and Suquamish Tribes. In February 1865, the Seattle Board of Trustees passed Ordinance No. 5, calling for the removal of Indians from the city. Efforts to exclude Indians from the city continued in later years, including the 1893 burning of the Duwamish winter village at the mouth of the Duwamish River (Ott, 2014).

Unlike many other American cities, Seattle never had a municipal zoning ordinance that explicitly discriminated against minority races or ethnicities. However, zoning in Seattle has played a role in segregation of minority populations. The Segregation and Integration section of the City of Seattle's 2017 Affordable Housing Assessment contains a map generated by the City of Seattle to show where racial and ethnic minority populations today live in relationship to how land is zoned in the city. The report finds that, with some exceptions, racial and ethnic minority populations disproportionately live in areas with zoning for multifamily housing or "commercial" zoning (which allows a combination of multifamily housing and commercial uses) (City of Seattle, 2017b). Due to longstanding land use patterns, this zoning is primarily located along, or otherwise in proximity to, major roadways. In general, it is more likely to provide lower-cost housing options in the existing housing stock. As seen in Exhibit 3.1–12 households with a racial or ethnic minority householder are significantly more likely to have incomes below 50 percent of the Area Median Income (AMI) compared to households with a White, non-Hispanic householder. Therefore, racial or ethnic minority populations are more likely to have been pressured economically to locate in areas of the city with lower-cost housing.

Other populations who may experience barriers to the access of housing include disabled persons. Housing that is suitable for persons with disabilities is limited and tends to be in newer buildings that charge higher than average rents. Members of the LGBTQ community also face discrimination that may affect housing options. When there is overlap by more than one of the racial, ethnic or social identities described above, intersectionality can amplify patterns and practices of discrimination.

In more recent years and at present other factors may be contributing to ongoing segregation. Issues such as credit checks, language barriers, and high move-in costs can all have disproportionate impacts on where racial and ethnic minority populations can live.

Race and Ethnicity

As the city has grown, its racial and ethnic make-up has changed. While the share of people who identify as White has remained steady at around 70 percent since the year 2000, the share of Asian persons increased from 13 percent to 14 percent of the population between 2000 and the latest ACS estimates.³ During the same period, the share of Black or African American persons decreased from about eight percent to seven percent. Persons who identified as two or more races grew slightly from five to six percent of the population during this period. Persons in other race categories—such as American Indian, Alaska Native, Pacific Islander, and other—held about the same share or declined slightly in their share of population during this period.⁴ The share of population who identified as Hispanic or Latino grew from about five percent in 2000 to 6.5 percent in the latest ACS. Seattle has also become a more international city, as about 18 percent of Seattle’s population in the latest ACS was foreign born, an increase from 17 percent in 2000. Overall, people of color living in Seattle increased from 32 percent of the population in 2000 to 34 percent in the latest ACS estimates but in the remainder of King County grew even faster.⁵ This was true particularly for people under age 18. The number of children of color increased only two percent in Seattle, compared with 64 percent in the balance of King County (City of Seattle 2016, 159).

An analysis of demographic change from 1990 to 2010 at the neighborhood level (City of Seattle 2017b) revealed the following findings:

- Loss of Black population in and around the Central District and in much of Southeast Seattle
- Increasing diversity where people of color have historically been a small share of population
- Increasing Black population shares in and around north Seattle neighborhoods and in parts of West Seattle
- Widespread increase in Hispanic/Latino population, with increasing concentrations in South Park and nearby southwest Seattle neighborhoods.
- Widespread, but not universal, increase in the share of neighborhood populations who are Asian or Pacific Islander

³ The 2011–2015 American Community Survey five-year estimates are used for the latest demographic analysis unless otherwise noted.

⁴ Given differences in how the U.S. Census asked about these questions in 1990 versus later censuses, observation about relative shares of population, trends, and Hispanic/Latino ethnicities must be made carefully.

⁵ The Census collects information on Hispanic/Latino ethnicity in a separate question from race. “People of color” encompasses Hispanics and Latinos of any race as well as people who are any race other than white alone.

Racial and Ethnic Composition of Neighborhoods

Review of demographic information shows that Seattle continues to exhibit a pattern where minority cultural and racial populations have higher concentrations in certain geographic areas of the city. Exhibit 3.1–2 shows the population in census tracts by the percentage of people of color. The share of the population who are people of color varies significantly by geographic area, with percentages of 50 percent and greater in census tracts near the Central Area, southeast Seattle, South Park, and Westwood–Highland Park.

Exhibit 3.1–3 from the 2017 Assessment of Fair Housing (AFH) shows a similar pattern comparing the share of a neighborhood's population who are people of color with the city's overall percentage share of persons of color. The AFH found that the Seattle neighborhoods can be grouped into three categories based on the percentage of residents who are people of color relative to the percentage of the city's residents who are people of color. Patterns in the first and third group of neighborhoods are generally those contributing the most to segregation levels measured in the dissimilarity index scores.

- Areas where people of color are a larger share of the population (42–89%). These areas are not typically dominated by a single racial/ethnic group but geographically are located south of the Ship Canal and include South Park, High Point, Rainier Valley, Pioneer Square, the International District, First Hill, and the Central Area. They are indicated in blue in Exhibit 3.1–3.
- Areas where people of color are a similar share of the population (28–39%). These areas include Georgetown, North Delridge, the Downtown Core and Belltown, Cascade/Eastlake, the University District, and a large group of neighborhoods in and around Seattle's north end. They are indicated in green in Exhibit 3.1–3.
- Areas where people of color are a smaller share of the population (10–27%). These include neighborhoods predominated by single-family zoning; areas nearer to shorelines and farther from interstates, highways, and arterials; and close-in neighborhoods to the northwest, north, and northeast of Lake Union, with a mix of housing densities and tenures. These areas tend to have the highest housing costs and are indicated in orange in Exhibit 3.1–3.

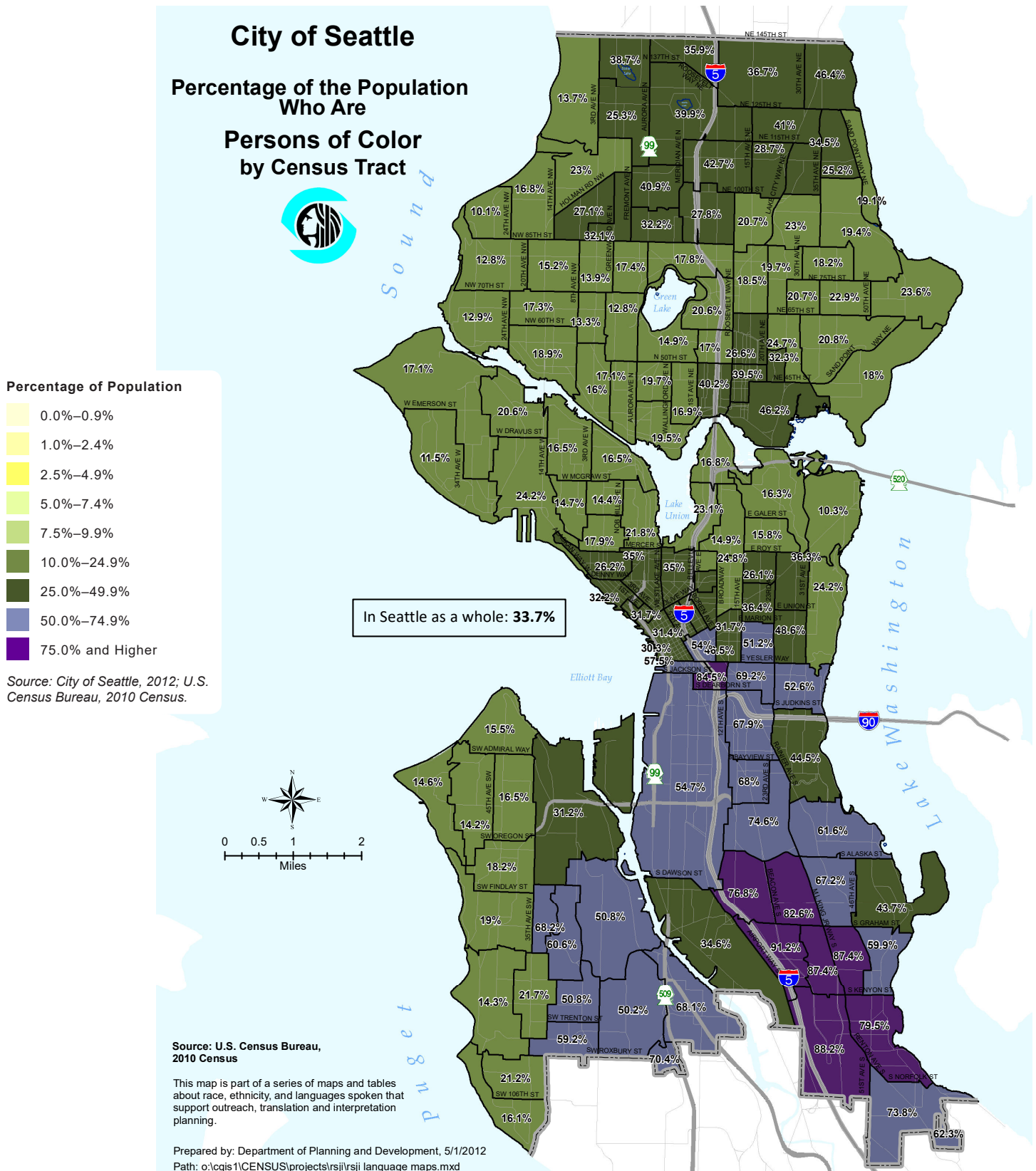


Exhibit 3.1–2 Percentage of Population Who Are Persons of Color, 2010

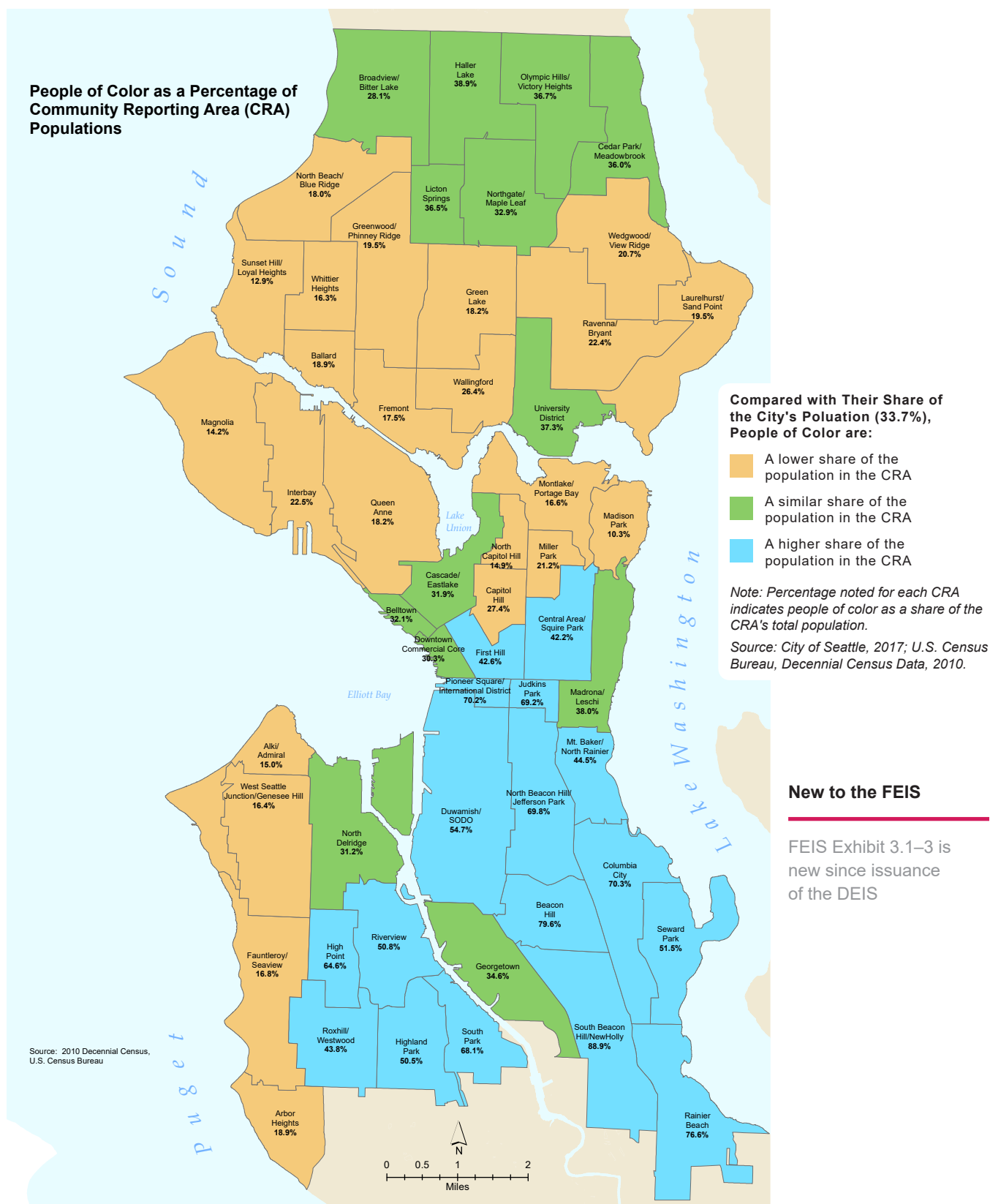


Exhibit 3.1–3 People of Color as a Percentage of Community Reporting Area (CRA) Population

As shown in Exhibit 3.1–4, Census data for limited English-speaking households shows strong concentrations along the southeast side of Seattle in Rainier Valley, further southwest in High Point and Highland Park, and north Seattle in and around the University of Washington, and in Northgate and Victory Heights. In contrast, very few households with limited English proficiency reside in areas such as Fremont that are just northwest of Lake Union and the Ship Canal. Limited English-speaking households are also a small share of the population living along the west side of the city and the Puget Sound shoreline, especially Magnolia and West Seattle. The general geographic patterns for these populations closely resembles the geographic distribution of people of color.

A potential gap in the analysis above is that data cannot disaggregate information on differing immigrant and ethnic communities in the same racial category. In some neighborhoods, demographic change could be even more pronounced if the presence of new immigrant communities, such as East African populations, were viewed as distinct from the African American community that came as part of the Great Migration and WWII. Similarly, the Asian and Pacific Islander racial category is very large, and changes for specific immigrant communities within it could vary substantially

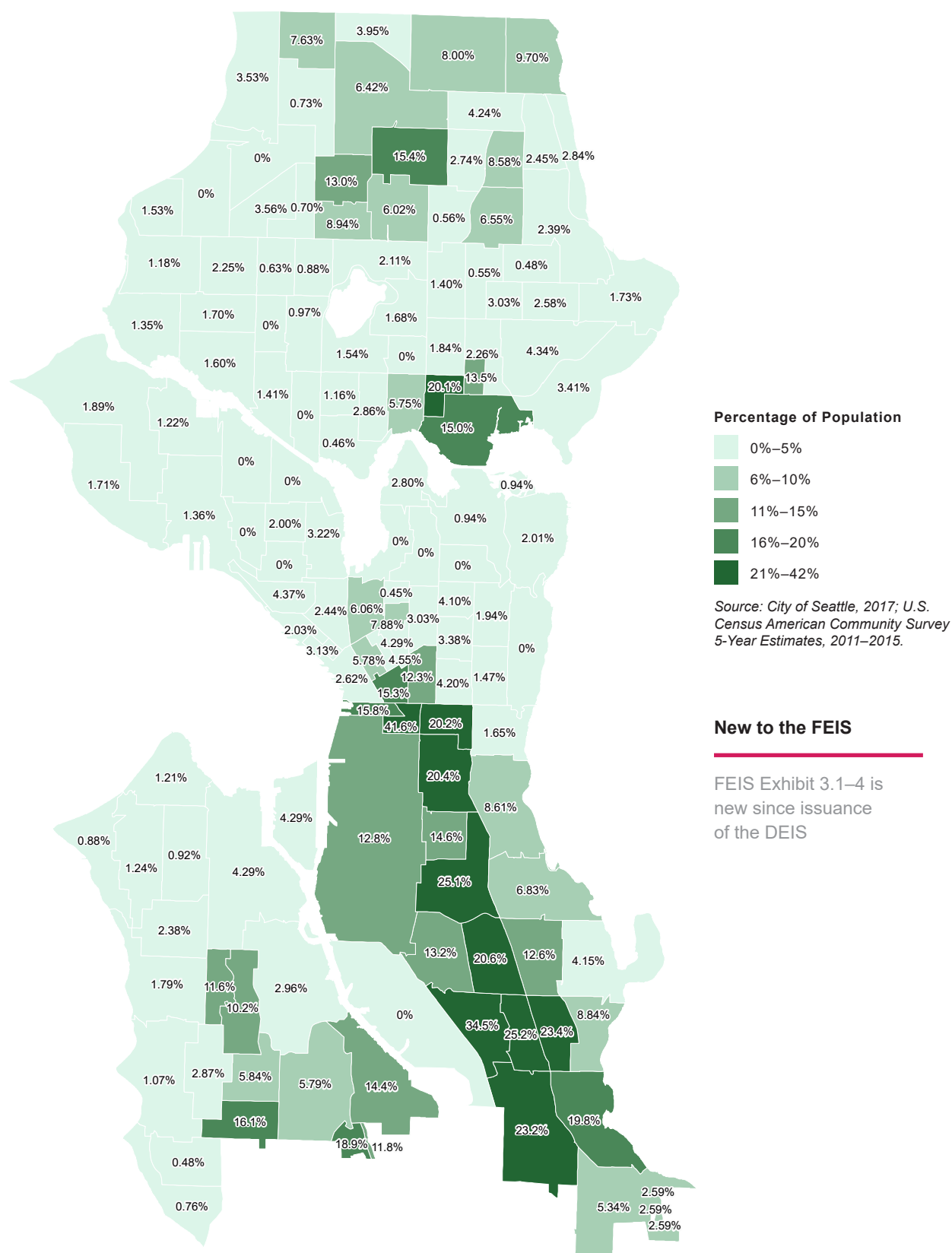


Exhibit 3.1–4 Limited English-speaking Households by Census Tract (Five-year ACS, 2011–2015)

Trends in the Racial Composition of Neighborhoods

Exhibit 3.1–5 shows changes in shares of the population by race from 1990 to 2010, as analyzed in the City’s Assessment of Fair Housing (AFH) submission to HUD in 2017. The percentage share of the population who are Black declined notably in the Central Area and nearby reporting areas. Almost all reporting areas in Seattle saw increases in the percentage of the population who are Hispanic or Latino, with the most notable increase in South Park and nearby areas of southwest Seattle. Most reporting areas saw increases in the share of populations who are Asian or Pacific Islander. All reporting areas north of the Ship Canal and in West Seattle saw reductions in the percentage share of the population by persons who are White.⁶

⁶ Exhibit 3.1–5 uses decennial Census estimates from the Brown University Longitudinal Tract Database, a database that adjusts for the change after 1990 in the way that the Census asks about race. The Seattle 2035 Growth and Equity Analysis further explores the historical change in the pattern of Seattle’s racial composition (Appendix A) using unadjusted decennial census estimates.

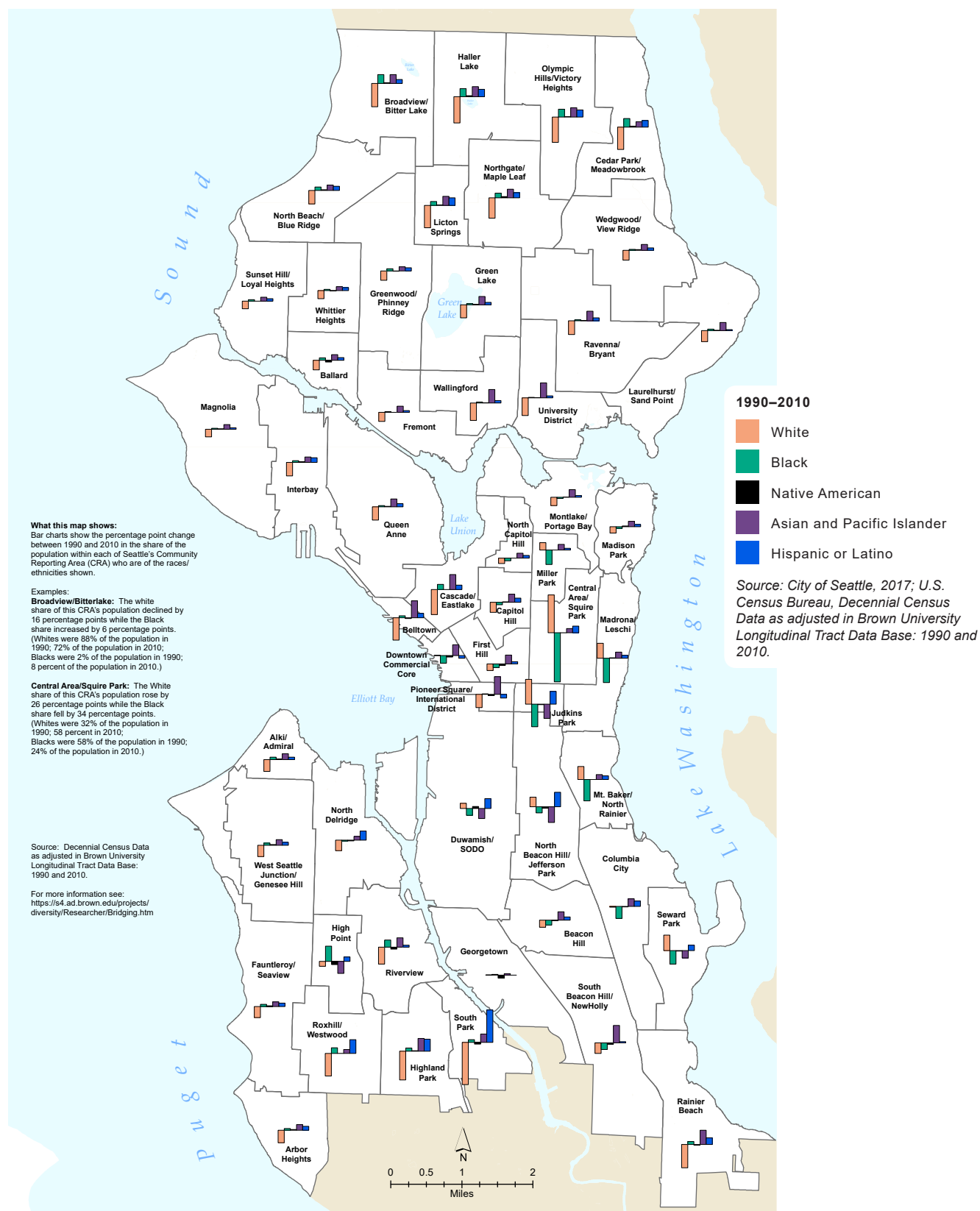


Exhibit 3.1–5 Change in Shares of Population by Race, 1990–2010

Age Profile

Exhibit 3.1–6 shows the population distribution by age and sex for all Seattle residents, Seattle residents residing in urban centers, and King County residents. Compared to the age distribution countywide, Seattle has a greater share of young adults in their 20s and 30s. In urban centers, young adults are even more prevalent. As of the 2010 Census, nearly one-half of Seattle’s population was aged 18 to 44.

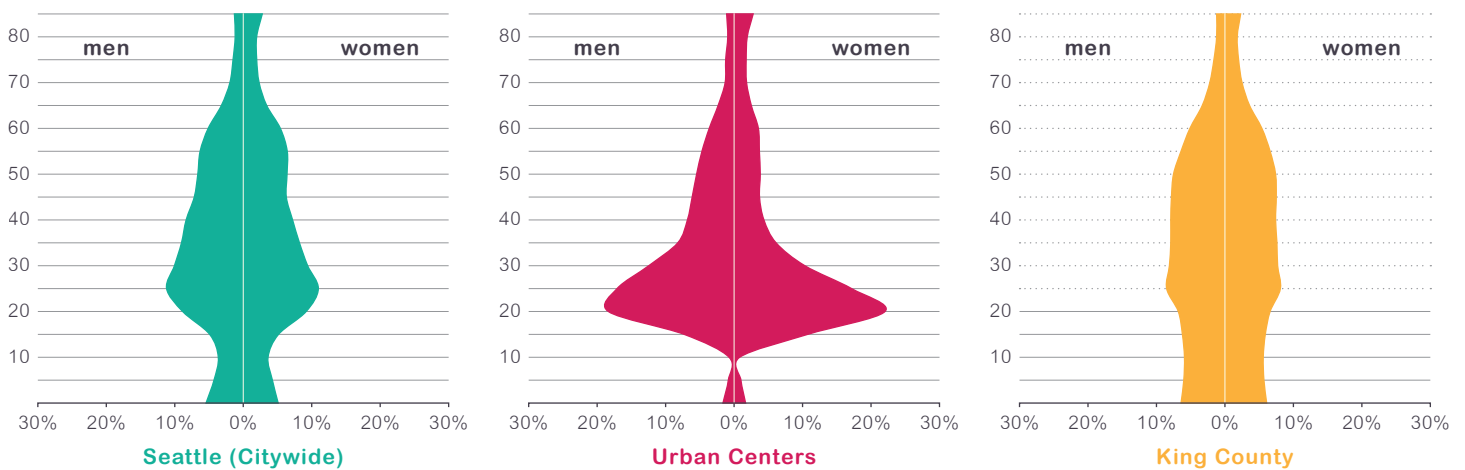


Exhibit 3.1–6 2010 Percentages of Population by Age and Sex

Source: U.S. Census 2010 Summary File 1; City of Seattle, 2016.

Household Size and Tenure

According to OFM, Seattle had about 325,000 households in 2016. Between 2010 and 2016, the city gained about 41,500 households, an nearly 15 percent increase. The average household in Seattle has 2.12 persons. This is a slight increase after a period of slow decline in household size, from 2.09 in 1990 to 2.06 in 2010. Household size varies by tenure: 2.39 for owner-occupied households and 1.89 for renter-occupied households.

Exhibit 3.1–7 shows the breakdown of all Seattle households by household size. Forty percent of all households are composed of a person living alone. Thirty-four percent of households include two people. Only a quarter of all households in Seattle have three or more people.

Between the years 2000 and 2010, the share of households citywide that are renter-occupied remained steady at around 52 percent. In the latest ACS estimates, 54 percent of households in Seattle are renter occupied. This recent trend is likely related to the rapid growth in multi-family housing during recent years, which is discussed in more detail below.

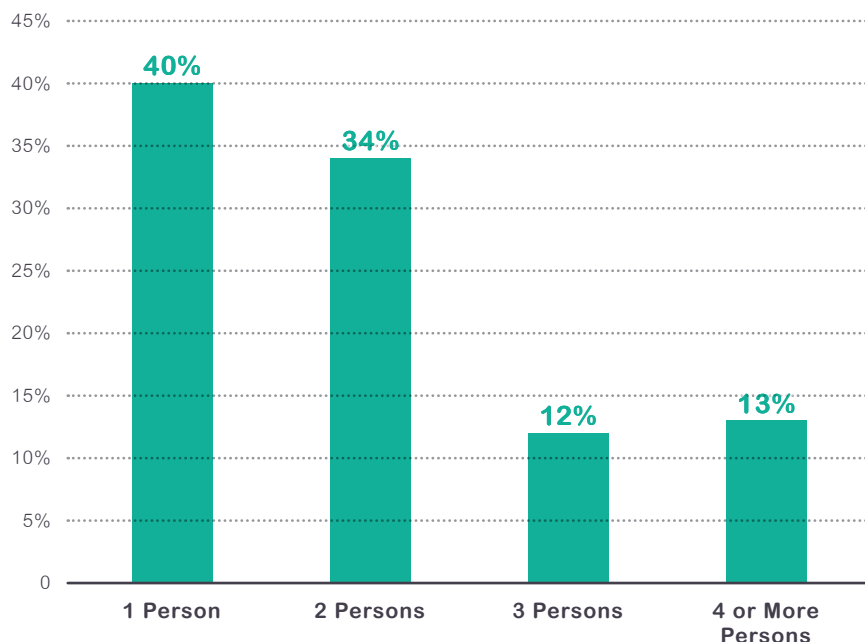


Exhibit 3.1–7 Seattle Households by Household Size

Source: U.S. Census American Community Survey 5-Year Estimates, 2011–2015; BERK, 2017.

Income and Wealth

The latest ACS estimates the median household income in Seattle to be \$70,600. This is roughly equal to the median household income of the Seattle-Tacoma-Bellevue metropolitan area: \$70,500. However, per capita income in Seattle was \$45,700, compared to \$36,900 for the region. This is due to the higher number of single-person households in Seattle compared to the region. In Seattle, family households tend to have higher incomes than non-family households: \$102,800 compared to \$50,200. This can be explained in part by the large number of non-family households that have only one member. A similar difference can be seen when comparing owner- and renter-occupied households: \$107,000 compared to \$48,000. The median owner-occupied household income was more than double that of the median renter household in Seattle.

HUD calculates area median income (AMI) based on the median family income in the metropolitan region, sets that to a four-person family, and then makes certain adjustments to calculate a set of income limits for different household sizes in each area. For the year 2016, the Seattle-Bellevue metropolitan area's AMI is \$90,300. Exhibit 3.1–8 shows income limits by household size relative to AMI.

Exhibit 3.1–8 HUD FY2016 Income Limits by Household Size in the Seattle–Bellevue, WA HUD Metro FMR Area

Household Size	PERCENT OF AREA MEDIAN INCOME (AMI)					
	30%	40%	50%	60%	70%	80%*
1 Person	\$19,000	\$25,320	\$31,650	\$37,980	\$41,145	\$48,550
2 Persons	\$21,700	\$28,920	\$36,150	\$43,380	\$46,995	\$55,450
3 Persons	\$24,400	\$32,520	\$40,650	\$48,780	\$52,845	\$62,400
4 Persons	\$27,100	\$36,120	\$45,150	\$54,180	\$58,695	\$69,300
5 Persons	\$29,300	\$39,040	\$48,800	\$58,560	\$63,440	\$74,850
6 Persons	\$31,450	\$41,920	\$52,400	\$62,880	\$68,120	\$80,400
7 Persons	\$33,650	\$44,800	\$56,000	\$67,200	\$72,800	\$85,950
8 Persons	\$35,800	\$47,680	\$59,600	\$71,520	\$77,480	\$91,500

* HUD 80% of AMI income limit capped by U.S. median family income level.

Source: HUD, 2016.

HUD obtains and publishes special tabulations from the Census Bureau to assist local communities assess housing needs. These tabulations, known as Consolidated Housing Affordability Strategy (CHAS) data, include estimates on the distribution of households by AMI-based income categories. The most recent data available that estimated the numbers of

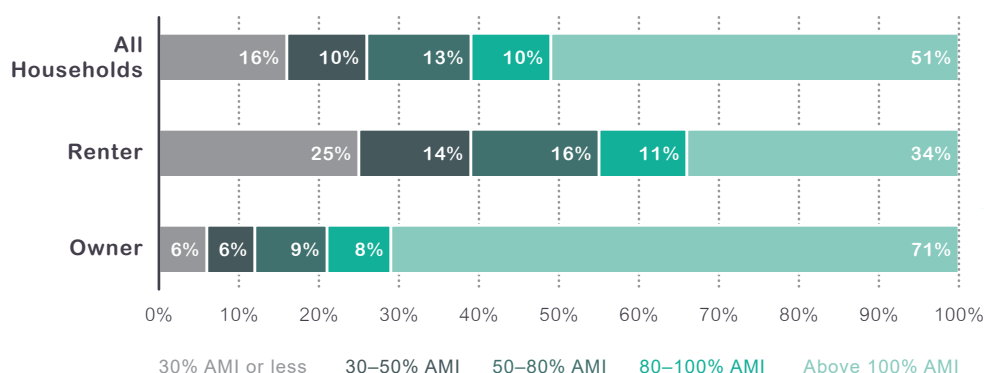


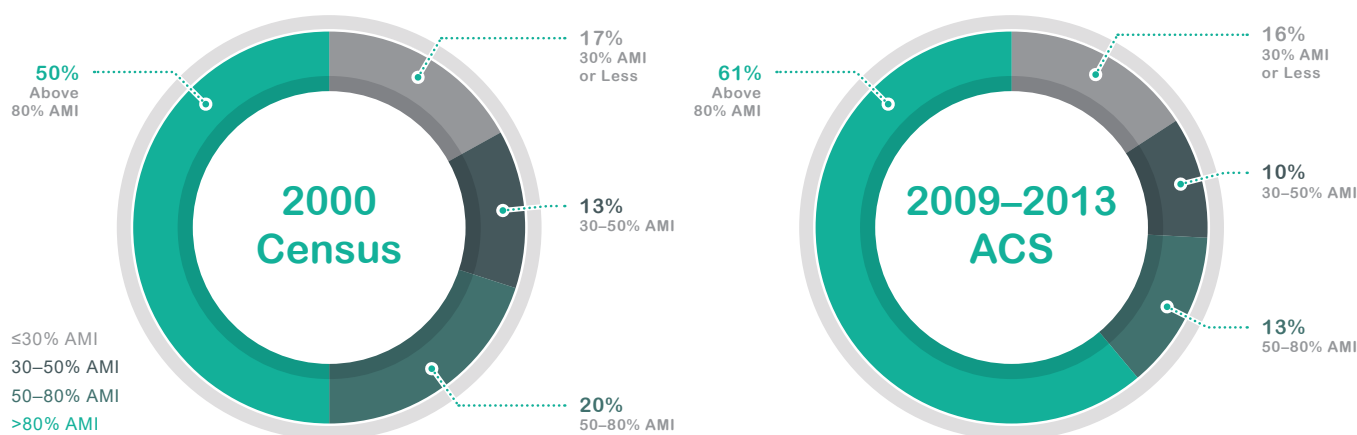
Exhibit 3.1–9
Household Income Breakdown by
Housing Tenure, 2009–2013 ACS

Source: U.S. Department of Housing and Urban Development (HUD), Consolidated Housing Affordability Strategy (CHAS) based on ACS Five-Year Estimates; BERK, 2017.

households by income level reflects data collected between 2009 and 2013. Exhibit 3.1–9 shows the distribution of households in Seattle by income level. A quarter of all renter households had incomes at or below 30 percent of AMI. Fourteen percent of renter households had incomes between 30 and 60 percent of AMI during this period. Owner-occupied households were much more likely to have incomes above 100 percent of AMI.

Household incomes have been changing over time. Exhibit 3.1–10 breaks down Seattle households by income level in 2000 and 2009–2013.⁷ During the 2009–2013 period there were considerably more higher-income households than in 2000, while the percentage of households in the moderate- and lower-middle-income categories (i.e., 30–80 percent of AMI) decreased.

Exhibit 3.1–10 Share of Total Households by Household Income Level, 2000 and 2009–2013





Source: HUD CHAS (based on U.S. Census 2000 and ACS Five-Year Estimates, 2009–2013); BERK, 2017.







⁷ The U.S. Census provides guidance on comparing 2013 ACS data to the 2000 decennial census (U.S. Census Bureau 2016). Data for both periods is associated with a margin of error due to reliance on survey data. The scale of change found in this analysis exceeds that which could be explained by margin of error alone.

Exhibit 3.1–11
Percentage of Households
with Income at or Below 60%
of AMI, 2009–2013 ACS

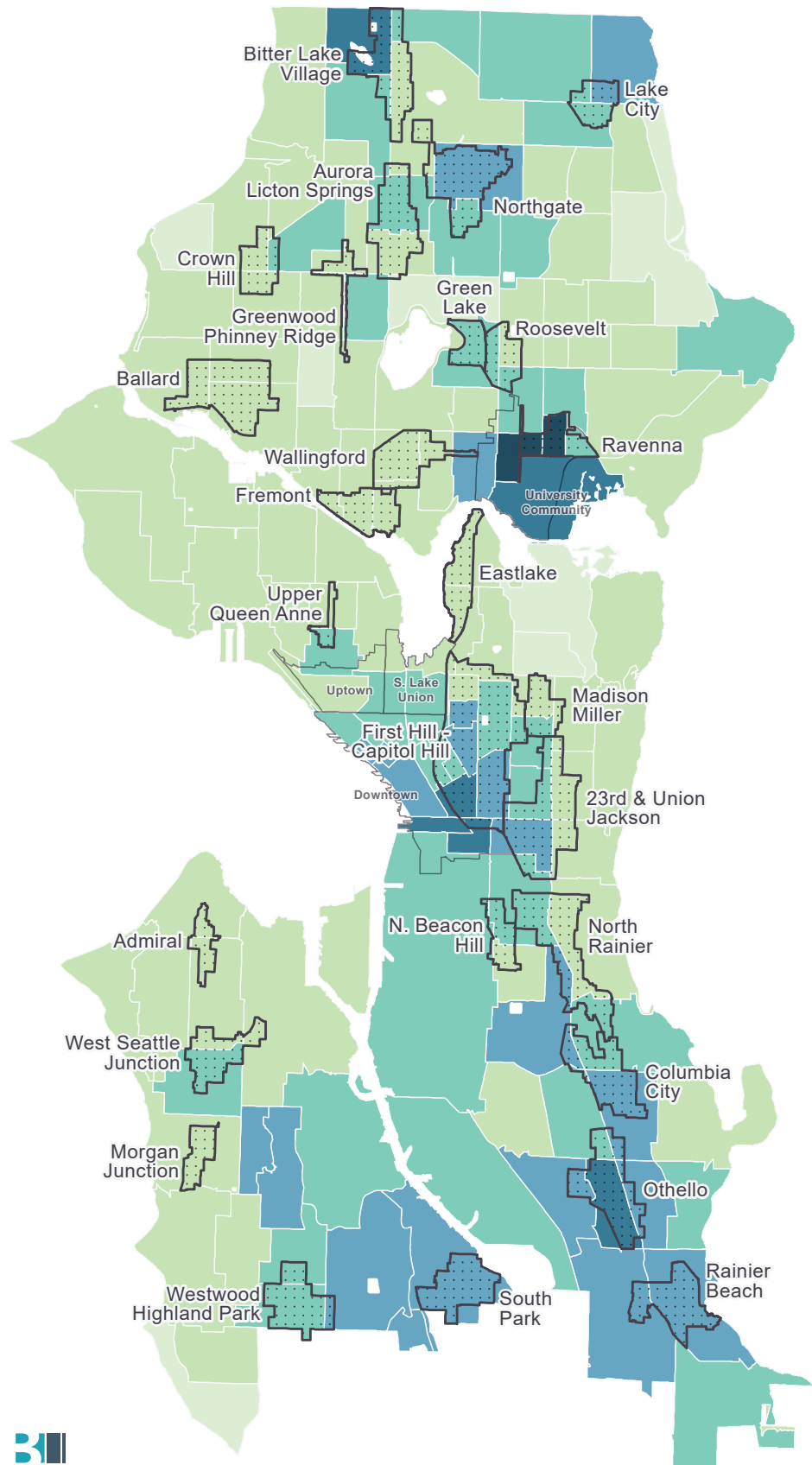
Urban Centers/Villages

-  In MHA Study Area
-  Outside MHA Study Area

**Percent of Households with
Income Below 60% AMI**

-  0% – 15%
-  16% – 30%
-  31% – 45%
-  46% – 60%
-  61% – 75%
-  > 76%

Source: HUD CHAS (based on ACS
Five-Year Estimates, 2009–2013, U.S.
Census Bureau); BERK, 2017.



The distribution of households by income level varies considerably across the city. Exhibit 3.1–11 shows the percentage of households with incomes of 60 percent of AMI or below based on five-year estimates from the 2009–2013 ACS. This percentage is highest in the University District, parts of Downtown, and several neighborhoods in the southern and northern parts of the city.

Household incomes also vary by household race and ethnicity, as shown in Exhibit 3.1–12. More than 40 percent of households with a householder of color have incomes of 50 percent of AMI or less. This compares to only 21 percent of households with a White, non-Hispanic householder. Among only households with an African American householder, 54 percent have incomes of 50 percent of AMI or less. Only 36 percent of households with a householder of color have incomes above AMI, compared to 57 percent of households with a White, non-Hispanic householder. Only 24 percent of African American households have incomes above AMI.

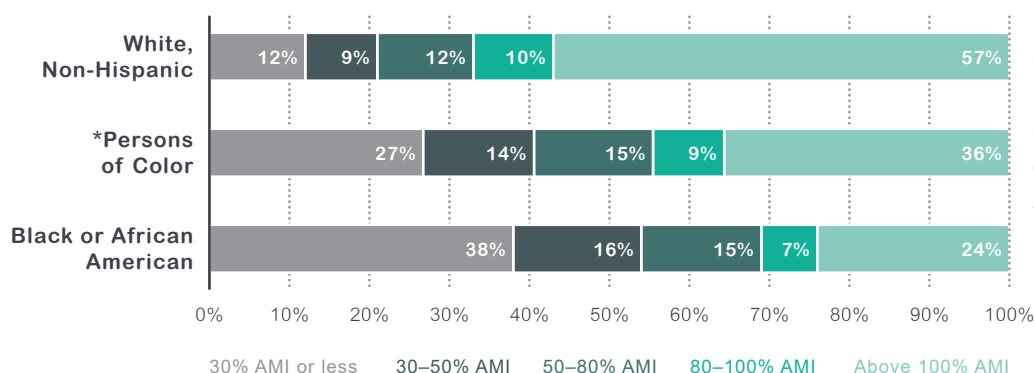


Exhibit 3.1–12
Household Income by Race/
Ethnicity of Householder,
2009–2013

**Persons of color includes households with householder who is Hispanic or Latino of any race and households with a householder who is any race other than White alone.*

Source: HUD CHAS (based on ACS Five-Year Estimates, 2009–2013); BERK, 2017.

Another indicator of economic inequality is the racial wealth divide. Data at the national level highlight how households of color, especially Black and Hispanic/Latino households, have on average substantially less wealth than White households. In 2013, the median net worth for U.S. households with a non-Hispanic White householder was \$132,483, compared to \$9,211 for Black householders and \$12,460 for Hispanic/Latino householders (U.S. Census Bureau, 2014). This racial wealth divide is widening. Over the past three decades, the average wealth of White households has grown three times faster than the average wealth of Black households. (Asante-Muhammad, Collins, Hoxie, & Nieves, 2016). Wealth also varies substantially by housing tenure. The median net worth of owner households was \$199,557, compared to \$2,208 for renter households.

Key Findings—Population and Household Characteristics

- Past racial segregation influenced where communities of color located in Seattle, and current demographics continue to reflect historic patterns of racial segregation.
- Seattle is growing rapidly due primarily to strong job growth and in-migration.
- Seattle's demographic composition is changing. More people of color are moving to neighborhoods that were once predominantly White.
- ~~-, while a~~ Areas with historically the highest shares of non-~~w~~Whites people are losing people of color rapidly.
- In Seattle, young adults in their 20s and 30s are a greater share of the population than this age group in the county as a whole. In Seattle's urban centers, young adults are even more prevalent than in the city as a whole.
- More than a quarter of all renter households have incomes of 30 percent of AMI or below.
- Compared to renters, owner-occupied households are much more likely to have high incomes.
- Since 2000, Seattle has ~~lost~~ experienced a reduction in share of low-income households earning with incomes between 30 and 80 percent of AMI ~~as a share of when compared to~~ total households citywide.
- Households with a householder of color, particularly one who is African American, are much more likely than other households to have low and very low incomes.
- Across the U.S., Black and Hispanic households have considerably less wealth, on average, than non-Hispanic White households. This gap is widening.

HOUSING INVENTORY

According to OFM, Seattle has about 338,000 housing units as of April 2016. Exhibit 3.1–13 shows the breakdown of these units by building type. About 43 percent of housing units in Seattle are single-family homes, and 48 percent are in larger apartment and condominium buildings with five or more units.

Exhibit 3.1–13 Housing Inventory by Building Type (Units in Structure), 2016

Building Type (Units in Structure)	Total Units	Percent of Total
1 (Single Family)	143,725	43%
2 (Duplex)	14,652	4%
3 or 4	16,367	5%
5 or more	163,272	48%
Mobile Homes	141	0%
Total Units	338,157	

Source: Washington State OFM Custom Data Extract, Sept. 16, 2016; BERK, 2017.

Between 2010 and 2016, the city gained nearly 30,000 net new units. About 90 percent of these net new units were in multifamily housing structures with five or more units, three percent were in duplexes, three percent were in buildings with three or four units, and four percent were single family homes (OFM 2016b). Exhibit 3.1–14 shows the distribution of housing growth through Seattle by urban village between 1995 and 2015. The great majority (77 percent) of new units occurred in urban centers and urban villages.

Exhibit 3.1–14 Housing Units in Seattle by Urban Center/Village, 1995–2015

	1995 Year-End Total Housing Units	1996–2015 Housing Units Built (Net)	% Change In Housing Units 1995–2015	2015 Year-End Total Housing Units*
Urban Centers	47,040	33,167	71%	80,322
Downtown	10,618	13,478	127%	24,347
First Hill–Capitol Hill	21,562	7,907	37%	29,619
Northgate	3,559	1,167	33%	4,535
South Lake Union	809	3,954	489%	4,536
University Community	6,583	3,168	48%	9,802
Uptown	3,909	3,493	89%	7,483
Hub Urban Villages	14,253	10,654	75%	24,505
Ballard	4,772	3,963	83%	9,168
Bitter Lake Village	2,364	1,380	58%	3,257
Fremont	2,194	1,111	51%	3,200
Lake City	1,391	1,138	82%	2,546
Mt. Baker (North Rainier)	1,568	875	56%	2,454
West Seattle Junction	1,964	2,187	111%	3,880
Residential Urban Villages	29,348	12,731	43%	42,174
23rd & Union–Jackson	3,342	1,979	59%	5,451
Admiral	847	311	37%	1,131
Aurora–Licton Springs	2,534	977	39%	3,454
Columbia City	1,794	1,367	76%	2,683
Crown Hill	1,125	174	15%	1,307
Eastlake	2,632	821	31%	3,829
Green Lake	1,512	860	57%	2,605
Greenwood–Phinney Ridge	1,244	595	48%	1,757
Madison–Miller	1,639	1,159	71%	2,781
Morgan Junction	1,196	220	18%	1,342
North Beacon Hill	1,171	215	18%	1,474
Othello	1,715	1,563	91%	2,836
Rainier Beach	1,280	113	9%	1,520
Roosevelt	1,031	573	56%	1,616
South Park	975	195	20%	1,292
Upper Queen Anne	1,363	377	28%	1,724
Wallingford	2,158	951	44%	3,222
Westwood–Highland Park	1,790	281	16%	2,150
Manufacturing/Industrial Centers	1,298	(39)	-3%	1,065
Ballard–Interbay–Northend	551	(15)	-3%	660
Greater Duwamish	747	(24)	-3%	405
Inside Centers/Villages	90,641	56,552	62%	147,001
Outside Urban Villages	170,972	16,503	10%	189,187
CITY TOTAL	261,613	73,055	28%	336,188

* To estimate the 2015 total number of housing units, City staff started with the most recent decennial Census (2010) housing unit count and added the net number new units built since that count was taken. (Net new units built is the number of newly built minus the number of units demolished, based on numbers in the SDCI permit system.) Adding the 1996–2015 permit data in the table to the 1995 total does not match the 2015 total, due to recalibrating the housing unit count from the 2010 decennial Census.

Source: City of Seattle 2016, 413.

Housing Affordability

Housing affordability is typically expressed as a measure of housing cost in relation to household income. The standard for housing affordability set by HUD is housing costs that amount to 30 percent or less of a household's gross income. Households paying more than 30 percent of their gross income for housing costs may have difficulty affording necessities such as food, clothing, transportation, and medical care and are considered to be "cost-burdened" with respect to housing. Households that pay more than 50 percent of their gross income for housing costs are considered "severely cost-burdened."

Exhibit 3.1–15 shows affordable rents for households in Seattle at different income levels. Rental housing costs include rent and basic utilities. For homeowners, costs include monthly principal, interest, taxes, and insurance; homeowner association dues; and other costs directly related to ownership of a unit.

Exhibit 3.1–15 Affordable Rents Including Utilities at 30 Percent of Household Income

Unit Size	HOUSEHOLD INCOME (PERCENT OF AMI)					
	30%	40%	50%	60%	65%	80%
0 Bedrooms	\$475	\$633	\$791	\$949	\$1,028	\$1,213
1 Bedroom	\$508	\$678	\$847	\$1,017	\$1,101	\$1,300
2 Bedrooms	\$610	\$813	\$1,016	\$1,219	\$1,321	\$1,560
3 Bedrooms	\$705	\$939	\$1,174	\$1,409	\$1,526	\$1,801
4 Bedrooms	\$786	\$1,048	\$1,310	\$1,572	\$1,703	\$2,010
5 Bedrooms	\$868	\$1,156	\$1,445	\$1,734	\$1,878	\$2,218

Source: HUD, 2016.

The most recent data about household cost burden is from the 2009–2013 ACS survey period. Exhibit 3.1–16 shows household cost burden by tenure. HUD estimates that 37 percent of all Seattle households are either cost burdened or severely cost burdened. Renter households are significantly more likely to experience cost burden than owner-occupied households. And they are nearly twice as likely to be severely cost-burdened: 20 percent of renter households are severely cost-burdened compared to 11 percent of owner households.

Exhibit 3.1–17 breaks down renter household cost burden by income category. Low- and very-low-income households are most likely to experience cost burden. 83 percent of low-income households spend

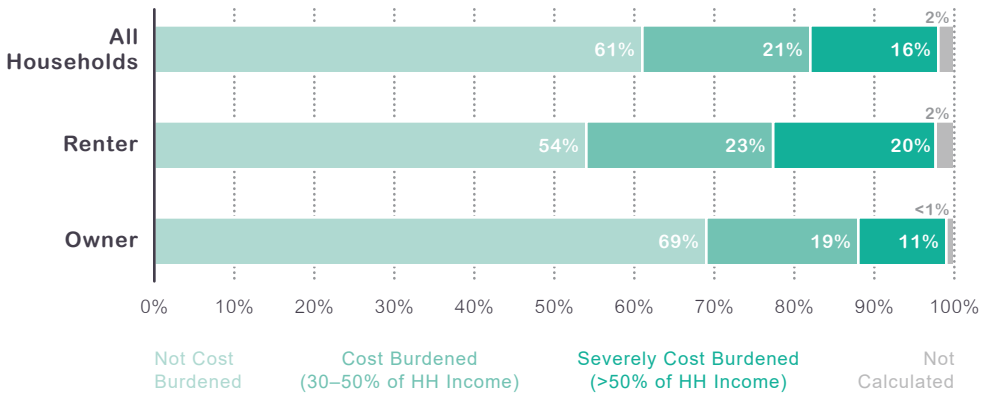


Exhibit 3.1-16
Household Cost Burden
by Tenure, 2009-2013

Note: "Not Calculated" refers to households with no or negative income.

Source: HUD CHAS (based on ACS Five-Year Estimates, 2009-2013); BERK, 2017.

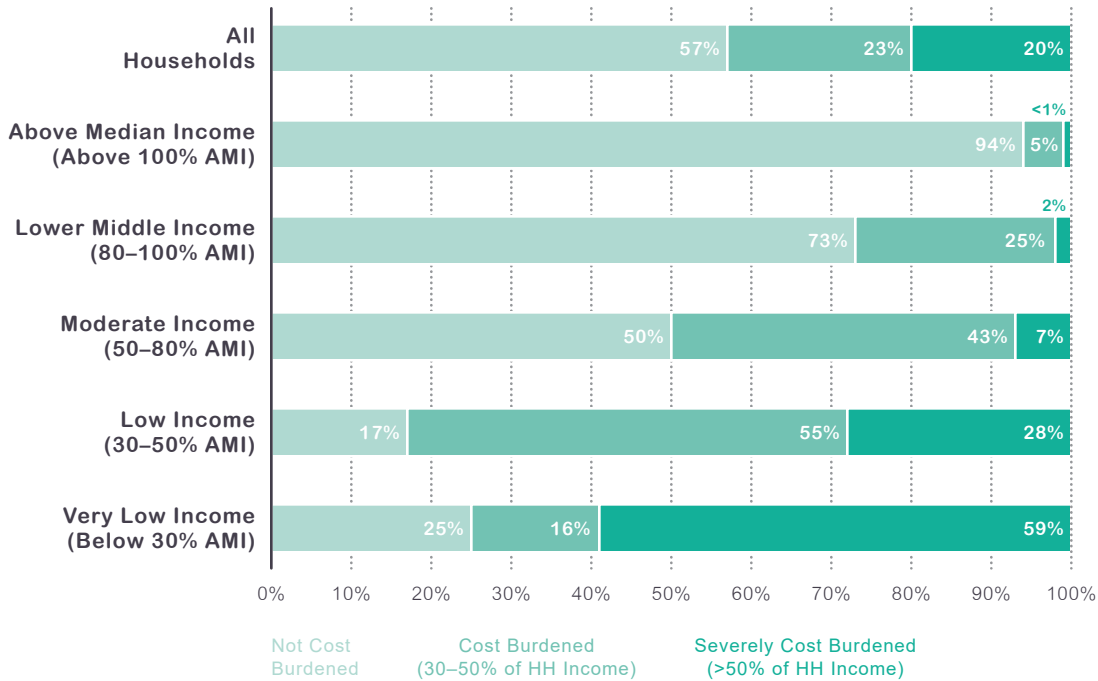


Exhibit 3.1-17
Share of Renter Households
with Cost Burden, by Income
Category

Source: HUD CHAS (based on ACS Five-Year Estimates, 2009-2013); BERK, 2017.

more than 30 percent of their income on housing while 28 percent spend more than half their income on housing. Even among households with incomes between 50 and 80 percent of AMI, nearly half experience some kind of burden.

Cost burden also varies by race. Exhibit 3.1-18 shows the percentage of all renter households in major racial and ethnic householder categories by their level of cost burden. While the percentage of households that are cost burdened is relatively high among all renter household types, households with a householder that is White alone and non-Hispanic are the least likely among all racial and ethnic groups to experience cost

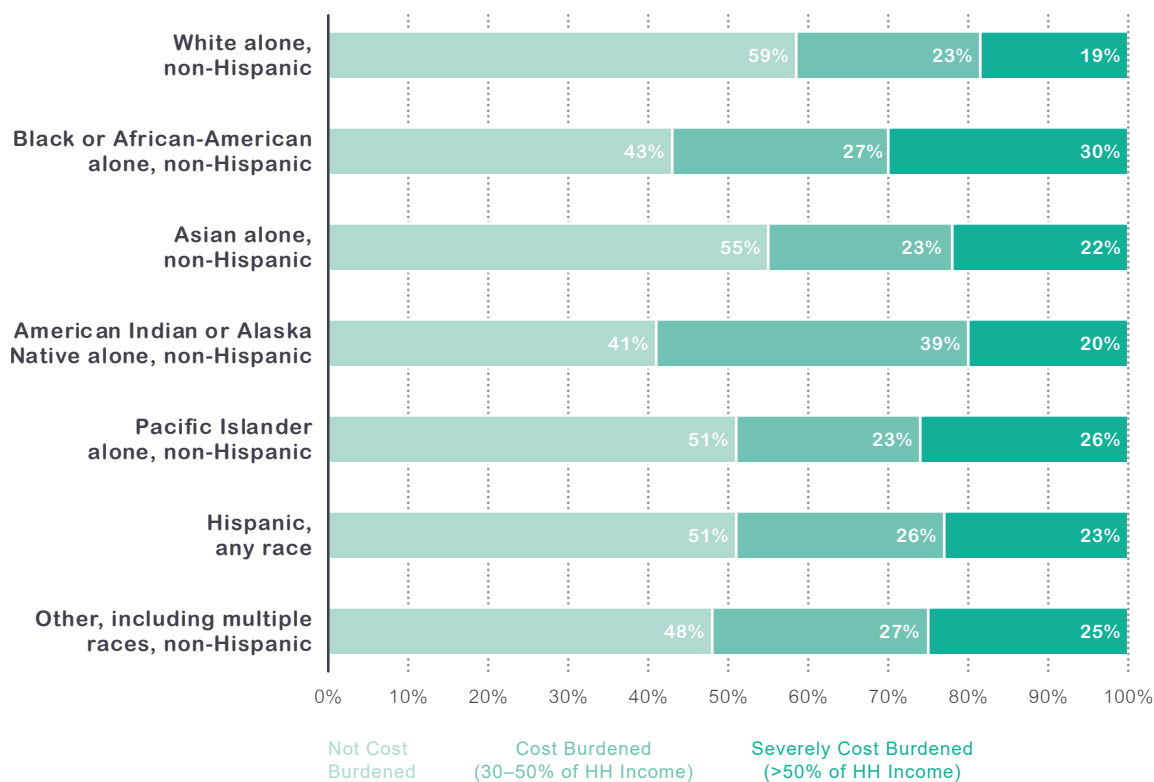


Exhibit 3.1–18
Share of Renter Households with Housing Cost Burden, by Householder Race

Source: HUD CHAS (based on ACS Five-Year Estimates, 2009–2013); City of Seattle, 2017; BERK, 2017.

New to the FEIS

FEIS Exhibit 3.1–18 is new since issuance of the DEIS

burden. Black householders are most likely to experience severe cost burden (30 percent compared to 19 percent for White non-Hispanic).

Exhibit 3.1–19 compares the share of renter households that experience housing cost burden by income level for the years 2000 and 2009–2013. The percentage of households with cost burden has risen since 2000 in all income categories. This rise in cost burden is most notable among renter households with incomes between 30 and 50 percent of AMI and between 50 and 80 percent of AMI.

Exhibit 3.1–19 Share of Total Renter Households with Housing Cost Burden, 2000, and 2009–2013

Income Category	2000	2009–2013
≤ 30% of Area Median Income	71%	75%
> 30% to ≤ 50% of Area Median Income	72%	83%
> 50% to ≤ 80% of Area Median Income	36%	50%
> 80% of Area Median Income	6%	11%

Source: HUD CHAS (based on ACS Five-Year Estimates, 2009–2013); BERK, 2017.

Exhibit 3.1–20 Share of Total Renter Households with Severe Housing Cost Burden, 1990, 2000, and 2009–2013

Income Category	1990	2000	2009–2013
≤ 30% of Area Median Income	55%	54 %	59%
> 30% to ≤ 50% of Area Median Income	21%	22%	29%
> 50% to ≤ 80% of Area Median Income	3%	4%	7%
> 80% of Area Median Income	N/A	1%	1%

Source: HUD CHAS (based on ACS Five-Year Estimates, 2009–2013); BERK, 2017.

Exhibit 3.1–20 summarizes the shares of households in each income level defined by HUD as severely cost burdened, meaning they spend more than half their income on housing. Percentages have risen in all income categories at or below 80 percent of AMI since 2000.

Rapid increases in rents are one key reason for the rise in the share of renter households that are cost burdened. Between fall 2010 and fall 2016, average monthly rents rose by 55 percent after adjusting for inflation, from \$1,104 to \$1,715. Rents rise when housing supply is insufficient to meet high demand. In Seattle, high housing demand is being driven in large by rapid job growth in Seattle and increased household preferences for in-city living.

Exhibit 3.1–21 shows inflation-adjusted rents in 2016 dollars and the rate of apartment vacancy. The relationship between housing supply and housing demand is reflected in the fact that, whenever the vacancy rate rose above five percent, inflation-adjusted rents either stabilized or declined. When vacancy rates fell below five percent, rents increased. This shows that maintaining stability in market-rate housing prices depends on sufficient housing supply, even if it does not lead to reductions in prices at the same scale of price increases that periods of housing shortage cause.

While the general relationship between vacancy rate and rents has been consistent throughout the 1997 through 2016 period for which data is available, it is also clear that the rate of increase in rents accelerated significantly starting around 2011. One explanation for this rapid increase in average rents is the prolonged period of low vacancy staring around 2010, indicating that demand for housing has outpaced housing construction over the past six years. However, despite demand outpacing supply, this was also a period of rapid housing construction. Rent for units in new apartment buildings tend to be higher than in older buildings. Exhibit 3.1–22 shows the average gross rent for one-bedroom apartments in medium to large apartment buildings in 2016. Units in

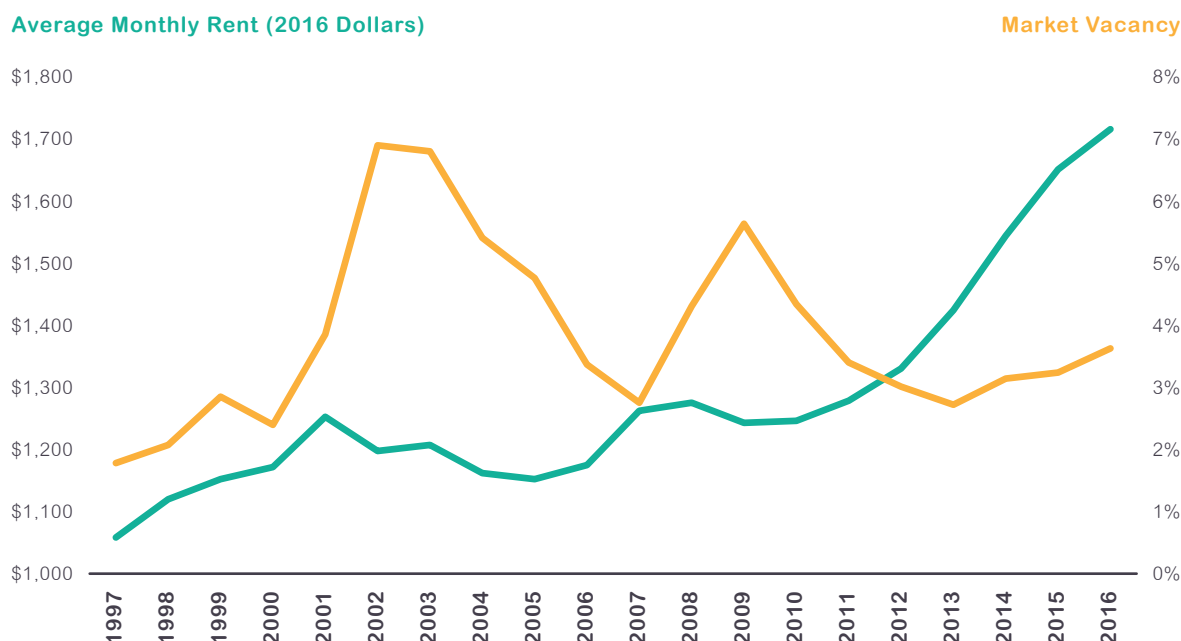


Exhibit 3.1-21 Average Monthly Rent in 2016 Dollars and Vacancy Rate in Apartment Complexes with 20+ Units, All Unit Types

Source: Dupre+Scott, 2017; BERK, 2017.

buildings built 2010 or later rent for \$2,077 per month on average. This is \$490 more per month than buildings constructed in the 1980s and 1990s, and \$760 more than buildings constructed from 1965–1979. This rapid influx of new buildings, in aggregate, can distort the apartment market by pushing up the average of all apartment rents. At the same time, the new supply reduces upward pressure on rents in the remaining housing stock.

Exhibit 3.1-22 One-Bedroom Gross Rents by Age Group Medium to Large Apartment Complexes (20+ units), Fall 2016

Period In Which Building Was Constructed	Surveyed Properties	Surveyed Units	Average Gross Rent	% Difference From Average for All 1-Br Units
1900-44	199	3,398	\$1,450	-17%
1945-64	129	3,869	\$1,374	-22%
1965-79	111	3,224	\$1,317	-25%
1980-99	177	5,826	\$1,587	-9%
2000-09	102	4,649	\$1,911	9%
2010+	165	12,659	\$2,077	19%
Total	883	33,625	\$1,752	0%

Source: Dupre+ Scott, 2017; City of Seattle, 2017; BERK, 2017.

While much of the newer rental housing in high-demand neighborhoods is currently affordable only to middle- and higher-income households, prior research indicates that new housing production can prevent or reduce negative impacts on housing affordability citywide in a general sense by reducing upward pressure on rents. Without newly constructed housing, more high-income households would compete with low- and moderate-income households for the remaining older housing stock in the market. This increased competition in turn increases upward pressure on all housing costs. Appendix I reviews prior research on the relationships between housing supply and housing costs. This review summarizes studies that quantify how constraints on housing production affect market-rate housing prices, as well as studies showing that increasing the quantity and diversity of housing stock in a high-demand housing market can reduce market-rate housing costs. These research findings suggest that housing costs in high-demand markets increase more rapidly when constraints slow the production of new housing supply.

When considering the impacts of new expensive housing on the housing market, it is also important to consider that this housing is not new forever. As shown in Exhibit 3.1–22, when housing stock ages, it gradually becomes more affordable relative to the remainder of the housing stock. Zuk and Chapple (2016) examined this process of filtering in the San Francisco Bay Area and found evidence that neighborhoods with more market-rate housing production in the 1990s had lower median rents in 2013. However, their review of previous research studies indicates that the rate of filtering is slow in a high-demand market like the Bay Area and therefore limited in its ability to provide affordable housing for low-income households. One plausible explanation for the slow rate of filtering is the fact that housing production is not keeping pace with housing demand.

Notwithstanding the positive effect on housing costs of additional housing supply referenced above, data show that additional housing supply will not fully solve the fundamental problem of insufficient affordable housing to meet the need for such housing among low-income households. While the cost of market-rate rental housing varies by age of housing stock, currently very little market-rate rental housing, whether new or old, is affordable to low- or very-low-income households. The City recently analyzed the affordability of unsubsidized rental housing based on surveys conducted by Dupre+Scott Apartment Advisors. Rental costs examined in that analysis included monthly rents and an adjustment for the cost of tenant-paid utilities (City of Seattle 2017). Exhibit 3.1–23 categorizes the rental housing stock in apartment complexes with 20 or

more units by level of affordability. This analysis finds that, citywide, only three percent of housing units in these market-rate rental buildings are affordable to households with incomes of 60 percent of AMI. Yet, nearly half of all renter households have incomes at or below 60 percent of AMI.

According to ACS, buildings with 20 or more units comprise 49 percent of all renter-occupied units in the city and 89 percent of the renter-occupied units built between 2010 and 2015. Smaller buildings with between five and 19 units account for 22 percent of renter-occupied units in the city. Most of these smaller buildings are older; only three percent were built since 2010. Only about 10 percent of renter households live in buildings with two to four units.

Survey data show that 13 percent of units in small apartment buildings with four to 19 units are affordable to households with incomes 60 percent of AMI or less. Among small multi-plexes with two to four units, 13.5 percent of all units fall in this category. The percentage share of units renting at this affordability level in smaller buildings is significantly higher than among medium to large apartment buildings (three percent).

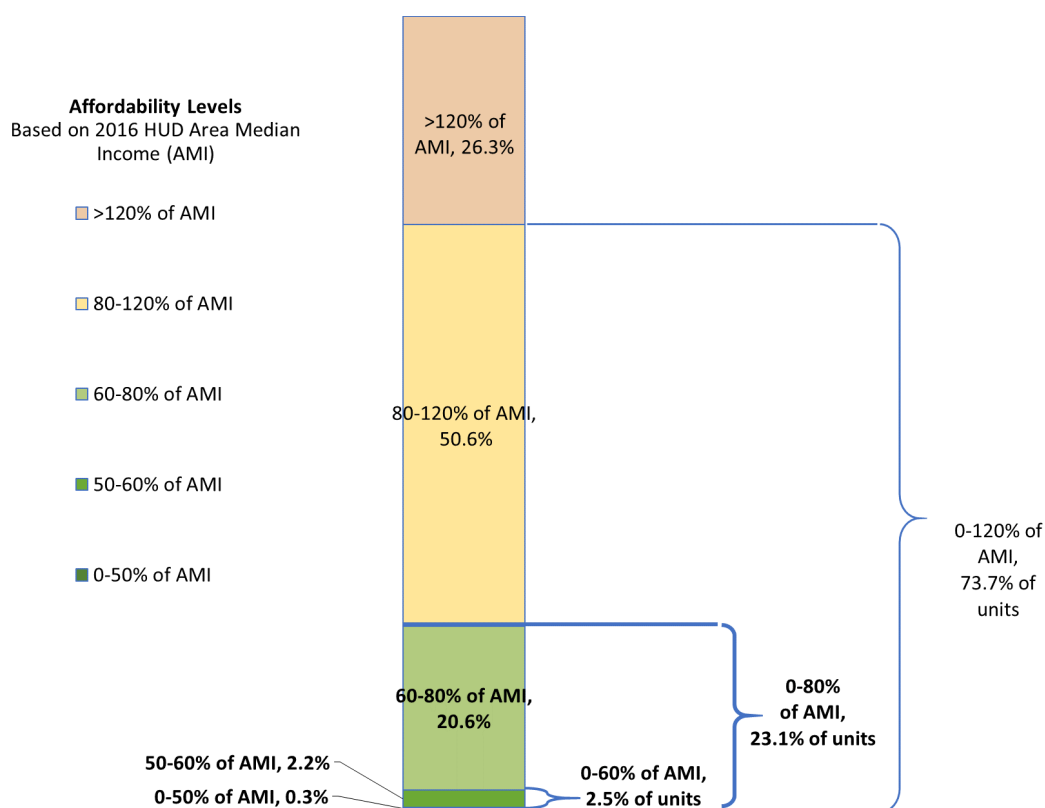


Exhibit 3.1–23 Affordability Levels of Unsubsidized Rental Units in Apartment Complexes with 20+ Units

Source: City of Seattle analysis of custom tabulations from Dupre+Scott Apartment Advisors. Based on D+S fall 2016 rent survey data.

Much of this difference comes from the fact that units in smaller buildings tend to be older, while newer construction comprises a much greater share of all units in medium to large apartment buildings.

This analysis of apartment housing costs shows that, under current conditions, very few low-income households can find unsubsidized market-rate housing (whether newly constructed or old) that is affordable to them. Additionally, many households able to find affordable housing are likely finding it in a neighborhood with lower housing costs. Exhibit 3.1–24 shows average monthly rents by unit type for 16 different market areas in Seattle. These same data are mapped in Exhibit 3.1–25. While rents differ significantly by area, they have been rising rapidly in all areas. The average annual rate of growth in average rents between 2010 and 2016 ranged between 4.8 percent in Riverton/Tukwila and 12.7 percent in Rainier Valley. Citywide, average rents have increased by 7.8 percent annually since 2010.

Exhibit 3.1–24 Average Monthly Rent by Unit Type in Apartment Complexes with 20+ Units, Fall 2016



Real Estate Market Area	All Units	Studio	1 Bed	2 Bed, 1 Bath	2 Bed, 2 Bath	3 Bed, 2 Bath	% Difference Compared to City Avg. (All Units)	Compound Avg. Annual Rate of Growth, 2010–2016 (All Units)*	Associated Urban Villages or Centers
Ballard	\$1,784	\$1,373	\$1,699	\$1,962	\$2,647	\$2,348	4%	8.1%	Ballard, Crown Hill (part)
Beacon Hill	\$1,184	\$910	\$1,181	\$1,415	\$1,580		-31%	6.3%	N. Beacon Hill, N. Rainier (part)
Belltown, Downtown, S. Lake Union	\$2,127	\$1,439	\$2,050	\$2,452	\$3,114	\$4,034	24%	6.5%	Belltown, Commercial Core, Denny Triangle, SLU, Pioneer Square
Burien	\$1,125	\$780	\$988	\$1,133	\$1,328	\$1,667	-34%	5.6%	
Capitol Hill, Eastlake	\$1,660	\$1,272	\$1,653	\$2,083	\$2,720	\$3,450	-3%	7.9%	Capitol Hill, Eastlake, Madison–Miller
Central	\$1,627	\$1,280	\$1,603	\$1,836	\$2,203	\$2,772	-5%	7.2%	12th Ave, 23rd & Union–Jackson, Chinatown-ID
First Hill	\$1,726	\$1,238	\$1,708	\$2,173	\$2,956	\$4,081	1%	9.8%	First Hill, Pike/Pine
Greenlake, Wallingford	\$1,742	\$1,295	\$1,654	\$1,874	\$2,404	\$2,395	2%	6.4%	Fremont, Greenlake, Greenwood–Phinney Ridge (part), Wallingford
Madison, Leschi	\$1,592	\$1,048	\$1,433	\$1,933	\$2,265		-7%	6.6%	
Magnolia	\$1,574	\$1,356	\$1,401	\$1,667	\$1,915	\$2,622	-8%	8.1%	
North Seattle	\$1,324	\$1,158	\$1,213	\$1,437	\$1,618	\$1,844	-23%	6.2%	Aurora–Licton Springs, Bitter Lake, Crown Hill (part), Greenwood–Phinney Ridge (part), Lake City, Northgate
Queen Anne	\$1,745	\$1,317	\$1,667	\$2,028	\$2,591	\$3,042	2%	7.4%	Upper Queen Anne, Uptown
Rainier Valley	\$1,484	\$1,388	\$1,278	\$1,496	\$2,446	\$1,218	-13%	12.7%	Columbia City, N. Rainier (part), Othello, Rainier Beach
Riverton, Tukwila	\$1,088	\$895	\$962	\$1,156	\$1,248	\$1,594	-37%	4.8%	South Park
University	\$1,482	\$1,215	\$1,397	\$1,461	\$2,312	\$2,349	-14%	6.7%	Ravenna, Roosevelt, University Campus, University District
West Seattle	\$1,543	\$1,294	\$1,460	\$1,605	\$2,158	\$2,711	-10%	7.4%	Admiral, Morgan Junction, W. Seattle Junction
White Center	\$1,317	\$981	\$1,126	\$1,313	\$1,467	\$1,635	-23%	5.6%	Westwood–Highland Park
CITY OF SEATTLE	\$1,715	\$1,305	\$1,641	\$1,863	\$2,436	\$2,715	—	7.6%	

* Growth rates not adjusted for inflation.






Source: Dupre+Scott, 2017; BERK, 2017.

Exhibit 3.1–25
Average Monthly Apartment
Rent by Market Area, Fall 2016

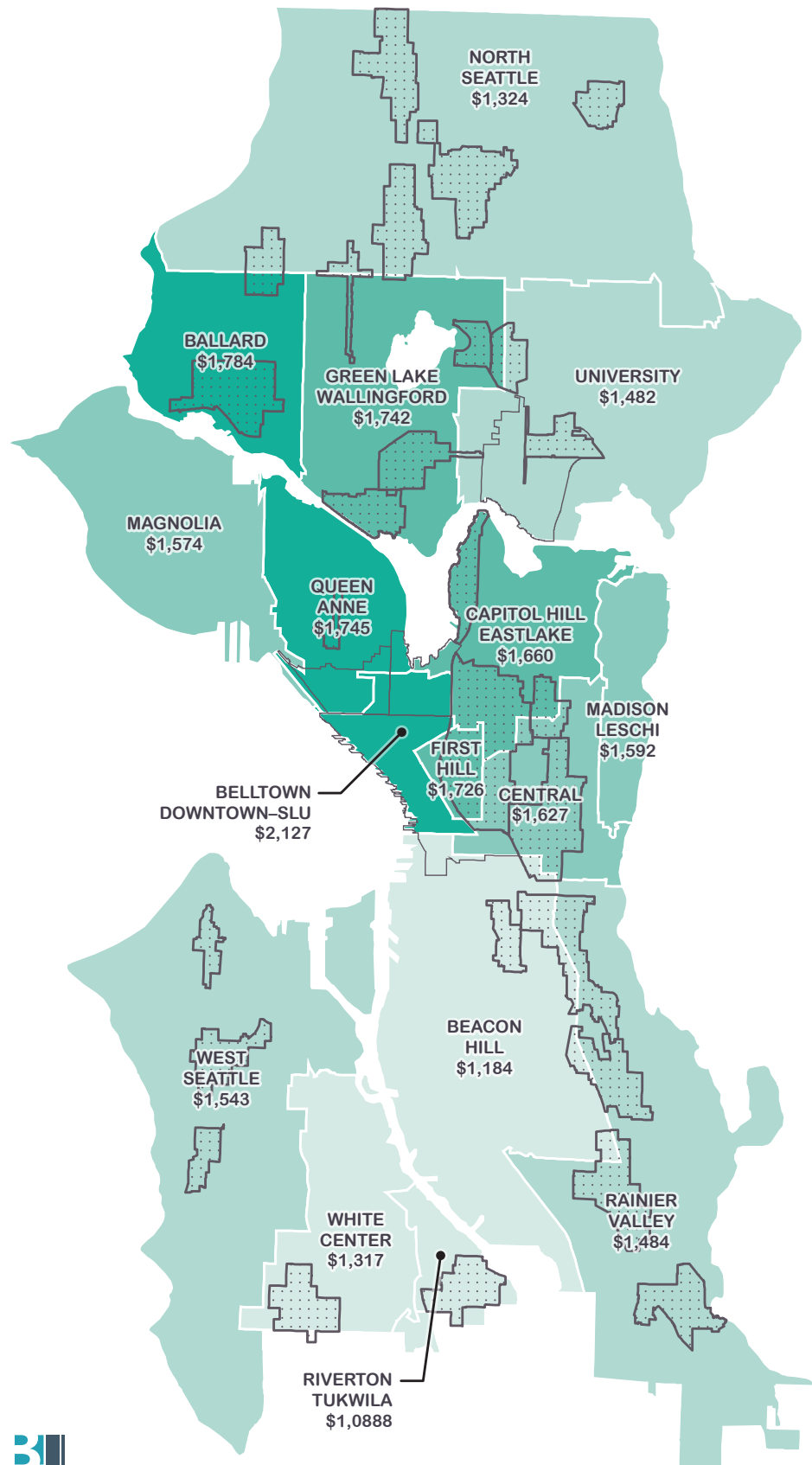
Urban Centers/Villages

-  In MHA Study Area
-  Outside MHA Study Area

**Average Monthly Rent
by Market Area**

-  \$1,088 – \$1,317
-  \$1,317 – \$1,543
-  \$1,544 – \$1,627
-  \$1,628 – \$1,742
-  \$1,743 – \$2,127

Source: Dupre+Scott, 2017;
BERK, 2017.



Key Findings—Housing Inventory

- 37 percent of all Seattle households are either cost burdened or severely cost burdened.
- 83 percent of low-income households are cost burdened.
- Renter households are significantly more likely to experience cost burden than owner-occupied households.
- The percentage of households with cost burden has risen since 2000 in all income categories, and the rise is most pronounced among renter households with incomes between 30 and 80 percent of AMI.
- Average rents have increased rapidly, by 55 percent between 2010 and 2016.
- Only three percent of market-rate apartment units in medium- to large-scale buildings are affordable with an income of 60 percent of AMI, and 13 percent of market-rate apartment units in small buildings are affordable to households with an income of 60 percent of AMI.
- Older housing stock is generally less expensive than new housing. For instance: Average rent for one bedroom apartments built in the periods 1900–44, 1945–64, and 1965–79 is 17 percent, 22 percent, and 25 percent less expensive than the citywide average, respectively.
- Average rents vary in the study area, with the highest rents found in Ballard, Green Lake / Wallingford, and Queen Anne.
- Rents have been rising in all areas of Seattle. In the city as a whole, rents have, on average, risen by 7.8 percent annually since 2010, with slowest annual growth in South Park and Westwood–Highland Park, and fastest growth in the Rainier Valley.

SUBSIDIZED HOUSING

Subsidized housing refers to housing provided to income-qualified households at below market-rate rents. These units are also commonly referred to as “rent- and income-restricted affordable housing” to clarify that the rent is legally restricted to be affordable to a household at a specified level of income, and that households must have incomes at or below the specified level to qualify for the housing. References to “affordable housing” in this chapter refer to subsidized rent- and income-restricted housing.

As of February 2017, the Seattle Office of Housing (OH) estimates there are a total of 28,000 subsidized rent-restricted units in the city, not including Multifamily Tax Exemption (MFTE) units (City of Seattle Office of Housing 2017). While market conditions for housing affordability change over time, subsidized housing is a stable source of units dedicated to providing affordable housing to low-income households. Most subsidized housing, except for MFTE, has a very long term of affordability of 50 years or greater, and when those long-term affordability covenants expire, OH reports that housing affordability covenants are usually extended. The pool of subsidized housing is likely an important factor contributing to the relatively stable share of very-low-income households in Seattle.

Seattle’s inventory of subsidized housing is owned and/or funded by various entities and programs. In many cases subsidized units are funded by multiple sources. The primary subsidized housing providers and funding source in Seattle are described below.

Seattle Housing Authority

The Seattle Housing Authority’s (SHA) low-income public housing program manages more than 6,153 public housing units in large and small apartment buildings; in multiplex and single-family housing; and in communities at New Holly, Rainier Vista, High Point, and Yesler Terrace. The Seattle Senior Housing Program has 23 apartment buildings—with at least one in every major neighborhood of the city—totaling approximately 1,000 units. These units offer affordable rent for elderly or disabled residents.

Also known as Section 8, the Housing Choice Voucher Program is a public–private partnership that provides vouchers (housing subsidies) to low-income households for use in the private rental housing market. It is

funded and regulated by the federal government. SHA administers more than 10,100 vouchers, not all of which are used within Seattle.

Among SHA households, 85 percent have very low incomes under 30 percent of area median income. 57 percent of households served are non-white.

Seattle Office of Housing

OH invests funds from the Seattle Housing Levy and other sources to create and preserve affordable homes. To date, the City has created and preserved nearly 14,000 affordable homes throughout the city. The largest source for the construction and preservation of rent- and income-restricted units comes from the Housing Levy, which has been in place since 1981. Voters renewed the Housing Levy in August 2016 and will provide \$290 million for affordable housing over seven years. Levy funds are allocated to affordable housing providers annually on a competitive basis. Funds received through incentive zoning and MHA are allocated concurrently with these Levy funds.

Of the approximately 14,000 housing units in OH's rental program, about 52 percent serve households with very low incomes (30 percent of AMI and below), about 30 percent serve low-income households (31–50 percent of AMI). Fifty-seven percent of households the OH programs serve are people of color.

Washington State Housing Finance Commission

The Washington State Housing Finance Commission (WHSFC) allocates federal low income housing tax credits (LIHTC) through two programs: 9 percent LIHTC Program and its Bond/Tax Credit Program which uses multifamily housing bonds and 4 percent tax credit financing through LIHTC. Developers may apply to either program through a competitive process.

Multifamily Tax Exemption Program

The Multifamily Tax Exemption (MFTE) program provides a property tax exemption to developers and owners of multifamily rental and for-sale residential projects. For rental properties, the property owner is excused from property tax on residential improvements in exchange for rent-restricting at least 20 percent of the units for income-qualified households during the period of exemption. Under State law, the program currently provides a 12-year exemption. The program has resulted in 7,399 rent- and income-restricted units through the 2016 reporting period.

The majority of rent restricted MFTE units serve households with income between 60 and 80 percent of AMI.

Exhibit 3.1–26 Total MFTE Units in Approved Projects (Inclusive of Market-Rate and Rent- and Income-Restricted Units), 1998–2016*

MFTE Program Period	Total Units Produced Including Market Rate Units	Rent Restricted Units
1998–2002	474	191
2002–2008	1,176	726
2008–2010	5,925	1,656
2011–2015	17,487	3,934
2016	3,518	892
Total	28,580	7,399

* Based on approved applications, inclusive of rental and for-sale units.

Source: City of Seattle, 2017.

Exhibit 3.1–27 Total Distribution of MFTE-Restricted Units by Percent of Area Median Income (Rental Only) 1998–2016*

Income Level	MFTE Restricted Units	Percent of Total
0%–60% AMI	2,055	27.1%
>60% AMI–80% AMI	4,699	63.5%
>80% AMI–90% AMI	695	9.4%
Total	7,399	100%

* Based on approved applications.

Source: City of Seattle, 2017.

Key Findings—Subsidized Housing

- There are approximately 28,000 publicly funded low-income housing units in Seattle.
- Most publicly funded units serve households with incomes 30 percent AMI and below, including 82 percent of SHA units and 52 percent of OH-supported units.
- Publicly funded housing serves a high percentage of households of color, as 57 percent of both SHA and OH supported units are occupied by people of color.
- In addition to publicly funded units, there are currently about 7,400 MFTE rent- and income-restricted units.
- 64 percent of MFTE units serve households with incomes between 60 percent and 80 percent of AMI. The percentage of households receiving housing assistance has not changed significantly in recent years.

DISPLACEMENT

In the context of housing, displacement refers to a process wherein households are compelled to move from their homes involuntarily due to the termination of their lease or rising housing costs or another factor. This is a different phenomenon than when a household voluntarily makes a choice to move from their home. There are three different kinds of displacement occurring in Seattle. Physical displacement is the result of eviction, acquisition, rehabilitation, or demolition of property, or the expiration of covenants on rent- or income-restricted housing. Economic displacement occurs when residents can no longer afford rising rents or costs of homeownership like property taxes. Cultural displacement occurs when residents are compelled to move because the people and institutions that make up their cultural community have left the area.

The City has some data related to the physical displacement of lower-income households with incomes earning up to 50 percent of AMI. Economic displacement is much more difficult to measure directly. However, analysis of census data can provide important insights and a sense of the extent of displacement that is likely occurring. No formal data currently exists to measure cultural displacement quantitatively, despite signs that it is occurring in some neighborhoods. While previous studies have examined issues like the loss of Black households over time by neighborhood in Seattle (Seattle OPCD 2016; City of Seattle

2017b), those losses could be a result of physical displacement, economic displacement, and/or other factors. The physical or economic displacement of members of a community can also precipitate the cultural displacement of other members of the same community. ~~Therefore, t~~This analysis qualitatively reviews the phenomenon of cultural displacement and considers potential cultural displacement impacts. focuses only on physical and economic displacement.

To summarize findings, we reference the Displacement Risk and Access to Opportunity typology. Developed as part of the Seattle 2035 Growth and Equity Analysis, these two composite indices combine data about demographics, economic conditions, and the built environment. The Displacement Risk Index identifies areas of Seattle where displacement of marginalized populations is more likely to occur. It combines indicators of populations less able to withstand housing cost increases or face structural barriers to finding new housing; neighborhood assets and infrastructure; redevelopment potential; and median rents. The Access to Opportunity Index evaluates disparities in certain key determinants of social, economic, and physical well-being. It includes measures related to education, economic opportunity, transit, public services, and public health. (See Chapter 2 for more discussion on these indices or Appendix A for the complete Growth and Equity Analysis.)

Physical Displacement

Various circumstances can cause physical displacement, including demolition of existing buildings to enable the construction of new buildings on the same site. Another cause is rehabilitation of existing buildings; strong demand for housing can encourage the rehabilitation of existing buildings to attract higher-income tenants. Single-family houses are also rehabilitated, expanded, or replaced with larger houses; redevelopment in these cases tends to result in more expensive units without increasing the supply of housing.

The best data available on physical displacement in Seattle comes from records of households eligible for tenant relocation assistance.⁸ Seattle's

⁸ *Not all households eligible for relocation assistance complete the TRA0 application process. Factors complicating the process to complete a TRA0 application may include language barriers or mental health. Data on the rate at which TRA0-eligible households complete the application process is not available. It should also be noted that TRA0 data does not include all instances of eviction. Therefore, eviction as a cause of physical displacement is beyond the scope of this analysis. Furthermore, no information is available regarding what portion of households receiving TRA0 are able to find other housing in the neighborhood or city. However, it is likely that many households displaced from a building also leave the neighborhood or city.*

Tenant Relocation Assistance Ordinance (TRAO) requires developers to pay relocation assistance to tenants with incomes at or below 50 percent of AMI who must move because their rental will:

- Be torn down or undergo substantial renovation
- Have its use changed (for example, from apartment to a commercial use or a nursing home)
- Have certain use restrictions removed (for example a property is no longer required to rent only to low-income tenants under a Federal program)

Between 2013 and 2016, nearly 700 households were eligible to receive assistance through TRAQ, about 175 households per year. [Appendix A Exhibit 3.1–28](#) breaks down these households by cause of displacement as well as by neighborhood category with regards to displacement risk and access to opportunity. Citywide, 391 TRAQ-eligible households were displaced due to demolition of their rental unit. This is 56 percent of all TRAQ-eligible households during the period and about 98 households per year. Areas of the city with high access to opportunity had more TRAQ-eligible households in total and more households displaced due to demolition.

Exhibit 3.1–28 Cause of Displacement Among TRAQ-Eligible Households, 2013–2016

NEIGHBORHOOD CATEGORY		CAUSE OF PHYSICAL DISPLACEMENT (TRAQ ELIGIBLE HOUSEHOLDS)				Total TRAQ-eligible
Displacement Risk	Access To Opportunity	Demolition	Renovation	Restrictions Removed	Change of Use	
High	High	127	62	57	33	279
High	Low	13	2		2	17
Low	High	204	61	25	44	334
Low	Low	47	15		6	68
Total (Citywide)		391	140	82	85	698

Source: City of Seattle, 2017; BERK, 2017.

Exhibit 3.1–29 compares TRAQ-eligible households for whom demolition was the cause of displacement to the total number of units permitted for demolition by the neighborhood's displacement risk and access to opportunity. Citywide, 17 TRAQ-eligible households were displaced due to demolition for every 100 units permitted for demolition. (In other words, approximately 17 percent of units permitted for demolition citywide had tenants with incomes at or below 50 percent of AMI.) However, this ratio varies by the neighborhood's displacement risk and access to opportunity, from 26 in areas with high displacement risk and high access to opportunity

down to just seven in areas with low displacement risk and low access to opportunity. It is notable that areas classified to have low displacement risk and high access to opportunity have a higher ratio than areas with high displacement risk and low access to opportunity. This suggests access to opportunity may be more strongly associated with the likelihood of development activity resulting in displacement than the neighborhood's displacement risk classification.

Exhibit 3.1–29 Demolitions that Result in Displacement of TRAO Eligible Households Within Income of 50% AMI or Less, 2013–2016

Displacement Risk	Access To Opportunity	TRAO-Eligible Households Due to Demolition	Units Permitted for Demolition	TRAO-Eligible Households per 100 Units Permitted for Demolition
High	High	127	492	26
High	Low	13	107	12
Low	High	204	1,075	19
Low	Low	47	683	7
Total (Citywide)		391	2,357	17

Source: City of Seattle, 2017; BERK, 2017.

TRAO records do not cover every instance of physical displacement caused by demolition of a rental unit. For example, the program does not track displacement of households with incomes greater than 50 percent of AMI. In addition, until recently the program did not have mechanisms to deter developers from economically evicting tenants prior to applying for a permit, in order to avoid the obligation to pay relocation benefits, nor did it provide additional assistance to ensure households with language or other barriers can successfully navigate the application process. Finally, this data does not reflect the physical displacement of SHA tenants who receive relocation benefits outside of the TRAO process, generally relating to the redevelopment of public housing.

Some demolitions occur in zones where the developer can replace an existing single-family home with a multi-unit structure such as townhomes or an apartment building. However, many demolitions involve the replacement of one older single-family home with a new single-family home. According to City permit data, between 2010 and 2016 29 percent of all units demolished were in Single Family zones. When excluding downtown zones, 32 percent of all units demolished were in Single Family zones, or 139 demolitions per year on average. This indicates that demand for new single-family homes accounts for nearly one-third demolitions outside downtown.

Economic Displacement

Economic displacement occurs when a household is compelled to relocate due to the economic pressures of increased housing costs. As discussed in the housing affordability section, market-rate housing costs are largely driven by the interaction of supply and demand in the regional housing market. Lower-income households living in market-rate housing are at greater risk of economic displacement when housing costs increase. This vulnerability disproportionately impacts communities of color. As shown in Exhibit 3.1–12, a disproportionate number of households in communities of color are lower-income compared to White, non-Hispanic households. This disparity is even wider for African American households. These disparities are rooted in Seattle’s history of redlining, racially restrictive covenants, and other forms of housing discrimination that contributed to racialized housing patterns and long-lasting wealth inequity due to barriers to homeownership. This history and the economic disparities that remain to this day result in greater risks of economic displacement among communities of color (Seattle OPCD 2016).

Without surveying individual households about their reason for moving, it is impossible to know exactly how many households are displaced due to the economic pressures of rising housing costs. However, using data from the Census and HUD, it is possible to determine if an area has on net gained or lost low-income households over time. Economic displacement is one possible explanation for a loss of low-income households over time. Other explanations include change in the income status of remaining households, loss of households due to household members passing away, or change in the demographic composition of the city, such as a greater share of young households with members early in their careers.

Exhibit 3.1–30 compares household estimates by income level from the 2000 Census to conditions captured in five-year estimates from the 2009–2013 ACS. During this period, Seattle gained over 28,000 households in total, an 11 percent increase. The income groups that grew the fastest were households with income above 120 percent of AMI and households with income at or below 30 percent of AMI. Households with income between 30 and 60 percent of AMI also increased in number, but at a slower rate. During this same period, Seattle lost over 12,000 households with income between 60 and 80 percent of AMI. It also lost households with income between 80 and 100 percent of AMI and between 100 and 120 percent of AMI. Overall, Seattle saw an increase in income disparity.

Exhibit 3.1–30 Change in Number of Households by Income Level, 2000 compared to 2009–2013

	CITY OF SEATTLE		REMAINDER OF KING COUNTY	
	Change	Percent Change	Change	Percent Change
Total Households	28,129	11%	166,529	48%
Household Income ≤30% AMI	8,193	22%	29,731	95%
Household Income >30% to ≤60% AMI	3,856	9%	31,832	65%
Household Income >60% to ≤80% AMI	-12,362	-38%	-3,614	-9%
Household Income >80% to ≤100% AMI	-3,487	-11%	5,562	12%
Household Income >100% to ≤120% AMI	-1,725	-7%	7,661	20%
Household Income >120% AMI	33,654	38%	95,357	67%

Source: HUD CHAS (based on U.S. Census 2000 and ACS Five-Year Estimates, 2009–2013); BERK, 2017.

The remainder of King County also saw an increase in income disparity during this same period, with even more rapid growth among households with income at or below 30 percent of AMI and households with income above AMI. However, unlike Seattle, it also experienced rapid growth among households with income between 30 to 60 percent of AMI and more moderate growth among households with income between 80 and 100 percent of AMI. Like Seattle, the remainder of King County lost households in the 60 to 80 percent of AMI range. Unlike Seattle, the remainder of King County gained households with incomes 100 to 120 percent of AMI.

Exhibit 3.1–31 breaks down these findings based on the Displacement Risk and Access to Opportunity typology. Areas with high displacement risk grew considerably faster than areas with low displacement risk. The areas of Seattle that most rapidly gained very-low-income households (below 30 percent of AMI) are characterized by high displacement risk and low access to opportunity, such as Bitter Lake and Othello. These areas also gained low-income households (30 to 60 percent of AMI) faster than the remainder of the city. Areas with high displacement risk and high access to opportunity also saw strong gains in very-low-income households. But gains among low-income households were slower in these areas. Although these areas gained lower-income households overall, some households in these areas likely experienced economic displacement.

All areas of Seattle lost households with incomes between 60 and 80 percent of AMI at a similarly rapid rate. Areas with low displacement risk

Exhibit 3.1–31 Percent Change in Number of Households by Displacement Risk and Access to Opportunity Typology, 2000 Compared to 2009–2013

	High Risk High Access	High Risk Low Access	Low Risk High Access	Low Risk Low Access	Citywide
Total Households	23%	19%	9%	6%	11%
Household Income ≤30% AMI	29%	59%	6%	20%	22%
Household Income >30% to ≤60% AMI	5%	21%	10%	7%	9%
Household Income >60% to ≤80% AMI	-31%	-40%	-38%	-41%	-38%
Household Income >80% to ≤100% AMI	5%	-11%	-12%	-15%	-11%
Household Income >100% to ≤120% AMI	11%	-18%	-7%	-11%	-7%
Household Income >120% AMI	86%	52%	34%	30%	38%

Source: HUD CHAS (based on U.S. Census 2000 and ACS Five-Year Estimates, 2009–2013); City of Seattle, 2017; BERK, 2017.

generally lost households at this income level just as quickly as those with high displacement risk. This finding also applies to differences in access to opportunity.

Areas characterized by high displacement risk and high access to opportunity, such as First Hill–Capitol Hill, Northgate, Lake City, 23rd & Union–Jackson, and Columbia City, gained households with incomes between 80 and 120 percent of AMI while areas characterized by low access to opportunity and low displacement risk saw losses in this income category. While all areas of the city added households with incomes greater than 120 percent of AMI, those with high displacement risk and high access to opportunity gained these households most rapidly.

It is clear is that income disparity in Seattle has been growing as the city gains more households at the highest and lowest ends of the income spectrum. This is consistent with findings for the remainder of King County as well as studies of income inequality nationwide (Proctor, Semega and Kollar 2016, Pew Research Center 2016). It is therefore likely that trends in Seattle are shaped, at least somewhat, by broader economic trends including the loss of middle-income jobs nationwide. In Seattle, economic displacement of low-, moderate-, and middle-income households is likely also contributing to this citywide change. However, other possible explanations exist too, and the relative contribution of economic displacement is not impossible to measure with existing data. For instance, the reduction in households with incomes between 60 and 120 percent of AMI could be due to some households changing in

income status, moving them into a higher- or lower-income category. Some households may have moved voluntarily, for instance to take a job in a different city. Some of the reduction among middle-income (80 to 120 percent of AMI) households might be explained by migration to more affordable cities elsewhere in King County, which saw gains at this income level.

There is also uncertainty about the causes of gains in the number of households at the lowest end of the income spectrum. These trends could be due to the increased availability of rent- and income-restricted housing in Seattle, which has grown steadily over time. Rent- and income-restricted units ensure housing opportunity for low-income households. As of February 2017, OH estimates 28,000 rent-restricted units in the city (City of Seattle Office of Housing 2017). Unfortunately, directly comparable and comprehensive historical data for the year 2000 is unavailable. However, some historical data is available. As noted above, between 1998 and 2016, Seattle gained 7,399 new affordable units through the MFTE program. While some have since converted to market-rate, many of these affordable units still provide housing for lower-income households.

HUD provides directly comparable historical data about the number of households that receive housing assistance from HUD programs (HUD 2017).⁹ In 2000, an estimated 12,537 Seattle households received some form of HUD housing assistance. In 2011, 14,388 households received assistance, an increase of 1,851. While reliable data about the income of these households is unavailable, nearly all HUD programs target households with incomes at or below either 30 percent of AMI or 50 percent of AMI. So, a rough estimate of the percentage of low-income households receiving assistance from HUD housing assistance programs is possible by comparing the number of assisted households to the total number of households with incomes at or below 50 percent of AMI. Based on this assumption, about 19 percent of these households received HUD assistance. Comparing HUD-assisted housing data for 2011 to household estimates by income level for the 2009–2013 period indicates the percentage has not changed citywide.

⁹ The source of this data is HUD's *Picture of Subsidized Housing*, a database that aggregates information from nearly all HUD programs that provide for subsidized housing, including those administered by local agencies. The data includes tenant-based vouchers, public housing, and privately project-based housing that receive HUD subsidies. Excluded from this data is housing assisted through HUD's HOME and CDBG programs. In 2016 this database included 20,259 households in Seattle (HUD 2017).

Exhibit 3.1–32 Change in in the Number of Households Without HUD Assistance, 2000 to 2009–2013

Household Income	High Risk High Access	High Risk Low Access	Low Risk High Access	Low Risk Low Access	Total
≤50% AMI (Total Change)	1,625	2,845	887	1,877	7,235
≤50% AMI (Percent Change)	10%	38%	4%	11%	16%

Source: HUD CHAS (based on Census 2000 and ACS Five-Year Estimates, 2009–2013); HUD, 2017; City of Seattle, 2017; BERK, 2017.

To develop a more accurate estimate of the potential scale of economic displacement in Seattle, it would be best to account for all assisted households and focus instead only on households living in market-rate units. While data limitations prevent an estimate of this number in past years, it is possible to estimate the change in number of low-income households that do not receive HUD assistance by subtracting the number of HUD-assisted households from the total number of households with income at or below 50 percent of AMI. Exhibit 3.1–32 shows the change in this count by the Displacement Risk and Access to Opportunity typology based on an analysis at the census tract level for the years 2000 and 2009–2013. In the city as a whole, tracts in all groups gained households during this period. However, areas with high displacement risk and low access to opportunity gained these households significantly faster than the remainder of the city.

What is Correlation?

Correlation is a statistical technique used to measure the strength and direction of a relationship between two variables, such as the number of new housing units added in a neighborhood and the change in number of low-income households living in that same neighborhood. This measure of strength is called a “correlation coefficient” (or “r”) with a range between -1 and 1.

An r value of 1 indicates that the two variables are perfectly related. For instance, if our analysis found that every new housing unit was associated with the gain of a low-income household, consistently in every census tract, then our calculation would reveal $r=1$. Conversely, if the analysis found every new housing unit is associated with the loss of a low-income household, then $r=-1$. In reality, variation in this relationship from one tract to the next causes r to fall somewhere between -1 and 1.

*An r value of ± 0.7 typically indicates a **strong** relationship between variables. An r value of ± 0.5 indicates a **moderate** relationship. An r value of ± 0.3 indicates a **weak** relationship. An r value under ± 0.3 has no meaningful statistical relationship.*

The purpose of a correlation analysis is not to prove that changes in one variable (such as the amount of new housing production) contribute to changes in another variable. Correlation is not causation. Rather, the purpose is to determine whether two phenomena are related. Additional analysis would be required to determine why two phenomena are or are not related or whether there is a causal relationship between two phenomena.

Note: this sidebar is new to the FEIS since issuance of the DEIS

Housing Development and Change in Low-Income Households

As Seattle grows, many residents are concerned about the potential relationships between new development and economic displacement at the neighborhood scale. Citywide, new development is critical to reduce the housing shortage and the competition for housing that increases housing costs. At the neighborhood scale, growth can also increase the number and diversity of housing choices through the creation of market-rate housing, and growth may also include the addition of rent- and income-restricted housing through subsidized housing investments. In some circumstances, this can make a neighborhood more affordable to low- and moderate-income households than it had been before. However, it is also possible that new development can contribute to economic displacement at the neighborhood scale. This can occur if new housing brings about amenities that make the neighborhood more attractive to higher-income households, driving up rents and housing prices.

While it is hard to predict the impact of new development on economic displacement at the neighborhood scale, it is possible to examine the historical relationship between housing growth and change in the number of low-income households at various income levels. Therefore, in this section we report on a statistical analysis of the correlation between new housing development and the gain or loss of households at various income levels. See the sidebar for a more detailed explanation of correlation analysis.

The analysis in this FEIS reflects several updates. After publication of the DEIS, newer data¹⁰ on household income and demographics became available from the U.S. Census Bureau and U.S. Department of Housing and Urban Development. The FEIS analysis now reflects the most recent Comprehensive Housing Affordability Strategy (CHAS) dataset, which is based on the 2010–2014 ACS.¹¹ Additionally, the FEIS explores a broader range of income levels than studied in the DEIS. This includes changes in the number of low-income (0–50 percent of AMI), moderate-income (50–80 percent of AMI), middle-income (80–120 percent of AMI), and high-income (>120 percent of AMI) households by census tract. Here we present a summary of this new analysis, which is presented in detail in Appendix M.

¹⁰ This newer data was used to update the correlation analysis only. Other ACS and CHAS data analysis presented in the DEIS have not been updated in the FEIS.

¹¹ Correlations involving these datasets rely on housing production data representing the midpoint of the five-year ranges.

For each income level, the analysis compares changes in the number of households with both overall housing production and specifically market-rate housing production. Accounting for subsidized housing production, including the number of low-income households who are provided housing in these new subsidized units, helps us understand if retention of low-income households in census tracts with substantial housing production was due to subsidized housing created in those tracts during the same period. After accounting for subsidized housing, the correlations highlight the relationship specifically between creation of market-rate housing and estimated change in the number of households living in market-rate housing. The FEIS analysis uses more complete and reliable data on subsidized housing production by census tract to do this analysis based on the Office of Housing's data on subsidized housing production and data from the Washington State Office of Financial Management (OFM).¹²

0–50 and 0–80 Percent of AMI

Exhibit 3.1–33 summarizes results of the income correlation analysis. It shows that housing production tends to have a positive relationship with changes in low-income households. Similar patterns appear when comparing new housing and changes in households with incomes 0–50 percent and 0–80 percent of AMI. For both groups, total housing production was moderately correlated with gains in low-income households (0.549 and 0.544, respectively). Census tracts with more overall housing growth were somewhat more likely to see increases in the number of households at both 0–50 percent and 0–80 percent of AMI.

When we isolate market-rate housing growth to account for subsidized housing production, we also see a positive relationship with changes in the number of low-income households living in market-rate housing (although weaker, at 0.342 and 0.370, respectively). This suggests that census tracts with more market rate housing production are slightly more likely than tracts with less market-rate housing production to see a gain of low-income households living in market-rate housing.

It is possible the relationship between housing production and change in low-income households depends upon the level of displacement risk and access to opportunity in the neighborhood. Therefore, the data

New to the FEIS

DEIS Exhibits 3.1–29 and 3.1-30, and the associated discussion of findings were moved to FEIS Appendix M

¹² *Note that subsidized housing provided through the Multi-Family Tax Exemption (MFTE) program is not included. MFTE units could be providing housing for some lower income households during the period of this analysis. MFTE units are an integrated part of market-rate housing development, with a 12-year tenure.*

Exhibit 3.1–33 Correlation Coefficients between Housing Production
and Changes in Low-Income Households

New to the FEIS

FEIS Exhibit
3.1–33 is new
since issuance
of the DEIS

Household Income	Citywide	High Risk High Access	High Risk Low Access	Low Risk High Access	Low Risk Low Access
0–50% AMI					
All Housing	0.549*	0.346*	0.589*	0.628*	0.515*
Market-rate Only**	0.342*	0.257	0.530*	0.406*	0.286
0–80% AMI					
All Housing	0.544*	0.513*	0.630*	0.581*	0.306*
Market-rate Only**	0.370*	0.389*	0.625*	0.408*	0.042
50–80% AMI					
All Housing	0.129	0.285	0.276	0.180	-0.203
Market-rate Only**	-0.006	0.077	0.555*	-0.196	-0.069
80–120% AMI					
All Housing	0.466*	0.289	0.325*	0.499*	0.496*
>80% AMI					
All Housing	0.805*	0.811*	0.263	0.897*	0.574*
>120% AMI					
All Housing	0.736*	0.776*	0.132	0.847*	0.372*

* Indicates a weak, moderate, or strong correlation. All values under ± 0.3 indicate no meaningful statistical relationship.

** The “Market-rate only” correlation analysis compares the number of new market-rate units built to an estimate of the change in the number of households living in market rate units, for each level of income. This estimate is calculated by subtracting the net change in subsidized units from the net change in households, by income level. Information about level of income served for each subsidized housing unit is not available. Therefore the 50–80% market-rate only correlations are less reliable, since many of the units are likely to be reserved for households at lower income levels and therefore our calculations likely overestimate the number of households at this level living in subsidized housing.

Source: HUD CHAS (based on Census 2000 and ACS Five-Year Estimates, 2010–2014); City of Seattle Office of Housing, 2017; OFM, 2016; BERK, 2017.

were grouped into four categories based on the Displacement Risk and Access to Opportunity typology. ~~While these scatterplots show some variation by area type, in all cases there is a weak positive correlation. As shown in Exhibit 3.1–33, the correlation coefficients vary somewhat by the Displacement Risk and Access to Opportunity typology, though all exhibit the same general pattern for both 0–50 and 0–80 percent of AMI. Whether we look at total or just market-rate housing growth, tracts with more net housing production are not associated with a loss of low-income households. In other words, census tracts with more housing production were slightly more likely to gain households with incomes at or below 50 percent of AMI. This same relationship can be found when comparing housing production to the change in number of households with income at or below 50 percent of AMI who are not assisted by HUD.~~

50–80 Percent of AMI

Exhibit 3.1–30 shows that both Seattle and King County experienced a loss in moderate income households between 2000 and 2009–2013. The relationship of housing production and households at this income level might be obscured in the 0–80 percent analysis. Therefore, Exhibit 3.1–33 includes correlation coefficients for the 50–80 percent income level. Results show that there is no statistically significant relationship (positive or negative) between housing production and change in moderate-income households at 50–80 percent of AMI. These findings apply to both total housing production as well as market-rate housing production.¹³ In other words, some tracts experiencing a loss in households at this income level had high levels of housing growth, and other tracts had almost no housing growth at all. The decline in Seattle’s moderate-income households is consistent with trends elsewhere in King County as shown in Exhibit 3.1–30. This suggests that broader economic forces could be playing a role.

80–120 Percent of AMI

Affordability of housing for middle income households that do not qualify for subsidy is also a concern. Exhibit 3.1–30 shows that Seattle lost households at this income level between 2000 and 2009–2013. The historical correlation of overall housing production and change in households with income at 80–120 percent of AMI is similar to the 0–50 and 0–80 percent of AMI levels (0.466). While many Seattle census

¹³ See the note under Exhibit 3.1–33 for a discussion of the market-rate only calculations at this income level.

tracts lost population at this income level, tracts with more housing growth were somewhat more likely to lose fewer or gain households at the 80–120 percent of AMI level.

>80 Percent of AMI and >120 Percent of AMI

Finally, the analysis also examines the correlation between housing production and gain or loss of higher income households. Exhibit 3.1–33 shows strong positive correlations between net housing production and changes in households with incomes above 80 percent (0.805) and above 120 percent of AMI (0.736). It is not surprising that census tracts with more newly constructed housing units would gain new households with middle and higher incomes, because many of the newly constructed units would tend to be occupied by households with moderate and high incomes who are in the market for housing in those neighborhoods.

Summary of Findings

To summarize, this historical analysis indicates that net new housing production has not been associated with a loss of low-income households at the census tract scale. Conversely, tracts that have received more net new housing production were more likely to see increases in both low- and middle-income households during the period of analysis. This finding applies to households with incomes at 0–50 percent, 0–80 percent, and 80–120 percent of AMI. At 50-80 percent of AMI, housing production is not correlated with changes in the number of households, perhaps in part due in part to broader economic trends related to income disparity. Overall, net new housing development is not correlated with areas experiencing a loss of low-income, moderate-income, or middle-income households. Net new housing development also correlates with areas gaining households with incomes above 80 and 120 percent of AMI.

Additionally, ~~this these~~ findings ~~applyies~~ to tracts in all displacement risk and access to opportunity typologies. While there are examples of census tracts that do not conform to ~~this these~~ general findings, they are not representative of patterns of change seen among census tracts citywide.

Another finding is that very few census tracts in high displacement risk areas experienced a loss of low-income households, and those that did lose these households didn't lose very many. On the other hand, many

census tracts with low displacement risk lost low-income households. This indicates that economic displacement can occur in all areas of the city and may not be more likely to occur in areas classified as high displacement risk.¹⁴

There are limitations to using change in the number of low-income, moderate-income, or middle-income households as a proxy for economic displacement. For instance, the most recent data available summarizing households' income relative to AMI are for the ~~2009 to 2013~~ 2010–2014 survey period. This period includes final years of the most recent economic recession. Consequently, there may be a greater number of households in low-income categories due to the temporary loss of employment. Additionally, the survey data do not fully reflect the impacts of this most recent period of rapid rent increases and housing production (2011 through 2016). Therefore, it is quite possible that the number of economically displaced low-income households has increased in recent years. However, no available evidence suggests that the general relationship between new housing production and gain/loss of low-income households has fundamentally changed during the last few years. Another limitation is the reliance on survey data which can have a large margin of error at the census tract level, particularly for smaller population groups. To help mitigate this limitation, we do not base conclusions on findings in any single census tract and instead look for patterns observed in many tracts. Finally, it is possible certain kinds of households, such as larger families, may be at greater displacement risk due to the relatively low supply of family-sized rental housing in Seattle. This analysis did not differentiate outcomes by household size or type. It is quite possible that the analysis of net change in low-income households can mask how one type of household (for instance larger households) may be replaced by others (young one or two person households).

¹⁴ It is important to note that the assessment of displacement risk level for tracts was made based on data collected at the end of this period of analysis. It may not be the case that all areas classified as high displacement risk would have been classified as high displacement risk in the year 2000 due to changing neighborhood characteristics over time.

New to the FEIS

Cultural Displacement, including associated footnotes, *Housing Development and Change in Racial and Ethnic Minority Populations*, and Exhibit 3.1–34, is a new section since issuance of the DEIS

Cultural Displacement

Cultural displacement occurs when people choose to move because their neighbors and culturally related businesses and institutions have left the area. As described in the History of Racial Segregation subsection above, people of color, immigrants and refugees have faced additional barriers to accessing housing in Seattle. Challenges to accessing housing due to segregation and discrimination often mirror challenges to accessing other opportunities, such as job and educational opportunities for these communities. As a result, social networks within racial and ethnic communities may take on a greater importance than for other populations. For communities of color, immigrants, and refugees, social cohesion can often play a bigger role in location decisions than for other populations. Since cultural anchors, gathering spaces, arts organizations, businesses, and religious institutions are not widespread in alternative locations within the region, the presence of these cultural assets can often have added importance to racial or ethnic minority households in their location decisions.

As a result, the disruption of social cohesion and community networks within racial and ethnic communities has the potential to exacerbate direct and economic displacement pressures that exist for broader populations. For example, if neighboring households or community-serving businesses within a racial or ethnic community experience direct or economic displacement, other households within the same racial or ethnic community may face increased pressure to relocate due to cultural factors. Cultural displacement can be reasonably assumed to accelerate or amplify the impacts of other displacement pressures, specifically for racial and ethnic minority populations.

Measuring cultural displacement is difficult since no systematic survey of households exists that asks why they have chosen to relocate. However, some indicators of cultural displacement can be measured at the neighborhood scale. Recall that Exhibit 3.1–5 shows that in neighborhoods including Central Area, Beacon Hill, and Columbia City the percentage shares of racial and ethnic minorities substantially declined between 1990 and 2010. It is also possible to measure the change in the population of racial and ethnic minorities over time to determine where cultural displacement may be occurring. Appendix M features an analysis of housing development and change in racial and ethnic minority populations. A summary of findings follows.

Housing Development and Change in Racial and Ethnic Minority Populations

One limitation of using change in the number of low-income households as an indicator of economic displacement is that it can overlook other changes at the neighborhood scale, including changes in racial and ethnic minority population. For example, a neighborhood that loses some households with incomes at 0–80 percent of AMI and gains others at the same income level could experience cultural change and displacement even if no aggregate change in the number of low-income households occurred. By analyzing the correlation between housing production and change in racial and ethnic minority populations, it is possible to identify whether a potential relationship between new development and cultural displacement could exist.

Exhibit 3.1–34 shows correlation coefficients measuring the relationship between new housing production and changes in population by major racial/ethnic category for the period of 2000 to 2011–2015. It shows that overall housing growth was moderately correlated with increases in the population of color¹⁵ (0.485). Tracts with more new housing tended to retain or gain people of color. However, the relationship of housing production and demographic change varies substantially by racial and ethnic group.

Exhibit 3.1–34 Correlation Coefficients between Housing Production and Changes in Population by Major Racial/Ethnic Category

Race	Citywide	High Risk High Access	High Risk Low Access	Low Risk High Access	Low Risk Low Access
Black/African American	0.190	0.197	0.480*	0.134	0.262
People of Color**	0.485*	0.480*	0.538*	0.535*	0.325*
Hispanic/Latino	0.109	0.152	-0.245	0.212	0.202
American Indian & Alaska Native	0.186	0.498*	0.301*	0.098	-0.448
Asian	0.450*	0.382*	0.466*	0.642*	-0.088
Native Hawaiian or Other Pacific Islander	-0.090	-0.138	-0.165	-0.051	-0.133
Non-Hispanic White	0.561*	0.347*	0.306*	0.712*	0.508*

* Indicates a weak, moderate, or strong correlation. All values under ± 0.3 indicate no meaningful statistical relationship.

** People who are a race other than non-Hispanic White.

Source: U.S. Census ACS Five-Year Estimates, 2011–2015; City of Seattle, 2017; BERK, 2017.

¹⁵ People with a race/ethnicity other than non-Hispanic White.

Black/African American Population

No significant correlation exists between new housing production and changes in the Black/African American population (0.190). Housing production varied widely among the census tracts that had fewer Black/African American people in 2011–2015 compared with 2000. Housing growth is not a predictor of the areas that lost Black/African American people. Similar correlation coefficients apply for all neighborhood categories according to displacement and opportunity, except for areas with high displacement risk and low access to opportunity (e.g., Othello, Rainier Beach, Bitter Lake) where the correlation was stronger between housing growth and increases in the Black/African American population (0.480). When interpreting these findings, it is important to remember that different immigrant and ethnic populations can be within the same racial category. So, for example, a neighborhood could lose U.S. born Black population while gaining new foreign-born Black population and see no net loss.

Hispanic/Latino Population

Likewise, housing production is not correlated with changes in the Hispanic/Latino population (0.109). In all displacement-opportunity categories, the correlation coefficient was between -0.245 and 0.212, suggesting that housing production is not related to changes in the Hispanic/Latino population. It is noteworthy that areas with high displacement risk and low access to opportunity had the only negative correlation coefficient for this ethnic group (-0.245) because this category includes census tracts in the South Park neighborhood where the Hispanic/Latino population grew substantially during this period while housing growth was very low. These findings demonstrate that other factors beyond housing production are more likely to be impacting demographic trends, such as emergence of a new cultural community or loss of a cultural anchor. And while factors like small business affordability and change in commercial space are not reflected in housing data, they are not entirely unrelated phenomena since new housing is frequently in mixed-use buildings that also generate new, usually higher-rent commercial space.

Other Racial and Ethnic Minority Groups

Other major racial and ethnic groups either had no correlation with housing production or a weak to moderate positive correlation. For the American Indian & Alaska Native and Native Hawaiian & Other Pacific Islander racial groups, new housing was not related to areas that gained or lost population at the citywide level; by displacement–opportunity category the correlation coefficients vary widely (-0.448 to 0.498), likely because those racial groups have fewer people overall and therefore census estimates include much larger margins of error at the census tract scale.

The most recent available data on racial and demographic composition at the neighborhood level reflect conditions between 2011 and 2015. Anecdotal information since the most recent available data gathered from community comments and stories suggests that the trend of losses of racial minority populations in the City’s historically largest share minority communities is continuing at present, and has potential to be more significant than can be demonstrated with available data (Wokoma 2017).

Non-Hispanic White Population

While population change for other racial and ethnic groups tend to show little or no correlation with housing production, changes in the non-Hispanic White population were moderately correlated with net housing production at the census tract level (0.561). A positive correlation is present in all displacement-opportunity categories, though the correlations are stronger in low displacement risk census tracts. Given the relative economic advantages of White households (see Exhibit 3.1–12 and Exhibit 3.1–18) it is expected that areas with more new housing, which tends to cost more than older housing, would correlate with gains in the White population.

Key Findings—Displacement

Physical displacement results when acquisition, rehabilitation, or demolition of property requires a household to move from their place of residence.

- An average of 98 households under 50 percent AMI were directly displaced by development activity annually, between 2013 and 2016. (This may be an underestimate for reasons noted above.)
- Based on TRAO data, about 17 households under 50 percent AMI were displaced per 100 demolitions.¹⁶
- Areas classified as having low displacement risk / high access to opportunity had a higher ratio of low-income households displaced, than areas with high displacement risk and low access to opportunity. This suggests access to opportunity may be more strongly associated with the likelihood of development activity resulting in displacement than the neighborhood's displacement risk classification.

Economic displacement occurs when residents can no longer afford escalating housing costs. While it is impossible to know exactly how many households are displaced due to the economic pressures of rising housing costs, ~~data~~ we can analyze changes in the number of lower-income households by neighborhood over time.

- Overall, Seattle has seen an increase in income disparity.
- Between 2000 and 2013, the number of high-income households (above 120 percent of AMI) and very-low-income households (below 30 percent of AMI) grew fastest.
- Seattle lost households with low- to middle-incomes (60-80 percent of AMI, 80-100 percent of AMI, and 100-120 percent of AMI). The remainder of King County lost moderate-income (60-80 percent of AMI) households more slowly, and gained middle-income households (80-120 percent of AMI).
- Areas with high displacement risk and low access to opportunity, such as Bitter Lake and Othello, were the fastest to gain very-low-income households (below 30 percent of AMI) and low-income households (30 to 60 percent of AMI), though it's unclear the extent to which this can be attributed to development of low-income housing.

¹⁶ [*See discussion on limitations of TRAO data on page 3.42.*](#)

- Areas with high displacement risk and high access to opportunity, such as First Hill–Capitol Hill, Northgate, Lake City, 23rd & Union–Jackson, and Columbia City, gained households with incomes between 80 and 120 percent of AMI, while other areas of the city saw losses.
- Overall, loss of low-income households does not correlate with areas of rapid housing development, although this data does not reflect the most recent development boom. Census tracts that experienced more net housing production were more likely to gain low-income households.
- Regardless of Displacement Risk and Access to Opportunity typology, the same relationship can be found when comparing housing production to the change in number of low-income households at the neighborhood scale.
- The creation of subsidized housing is partially responsible for the retention or gain of low-income households in areas that had more housing development.

Cultural displacement occurs when people choose to move because their neighbors and culturally related businesses and institutions have left the area.

- There are indicators that cultural displacement is occurring in Seattle in ways that are specific to racial and ethnic minority populations, and the potential for cultural displacement is heightened for these groups compared to other populations.
- No significant statistical relationship exists between housing production and changes in the population of certain racial and ethnic groups, such as Black/African American people.
- Factors other than new housing production are contributing to cultural displacement in ways that are distinct from displacement of low-income households.
- Gains in the non-Hispanic White population are correlated with net housing production, and those gains in the White population in certain neighborhoods may contribute to cultural displacement

3.1.2 IMPACTS

This section evaluates and compares the impacts that the three DEIS alternatives could cause or contribute to by the year 2035 and compares these impacts to those of the Preferred Alternative. Impacts include effects on the supply of new market-rate and income-restricted affordable housing units; how the distribution of growth could increase access to amenities and other neighborhood attributes that contribute to household success by locating housing in high opportunity areas; and the relative potential for displacement, particularly in areas of high displacement risk. For brevity, throughout this section the term “affordable units” will be used to describe rent- and income-restricted affordable housing.

IMPACTS COMMON TO ALL ALTERNATIVES

Housing Supply

The alternatives would result in varying impacts to supply of market-rate and affordable units in Seattle. Under all ~~three~~ four alternatives, the study area would have sufficient development capacity to accommodate planned levels of residential growth during the planning period, as shown in Exhibit 3.1–35. Development capacity is a theoretical calculation of the total amount of development allowed under current zoning over an indefinite time horizon (see Appendix G for detail). From this perspective, there is theoretically ample zoning capacity to accommodate the minimum amount of household growth anticipated in the Seattle 2035 Comprehensive Plan. Alternatives 2, ~~and 3,~~ and the Preferred Alternative ~~both~~ provide greater capacity for housing than Alternative 1 No Action and anticipate greater housing growth over 20 years. If very strong demand for housing in Seattle continues over the study period beyond levels anticipated in the growth estimates of the Seattle 2035 Plan, Alternatives 2, ~~and 3,~~ and the Preferred Alternative are better able to accommodate heightened demand for housing. Net new housing supply associated with the action alternatives and Preferred Alternative in 2035 is expected to be about 37 percent greater than Alternative 1.

Exhibit 3.1–35 Capacity for Housing Growth Compared to Housing Growth Estimate in Study Area

	Alternative 1 No Action	Alternative 2	Alternative 3	<u>Preferred Alternative</u>
Housing Capacity	152,329	238,222	222,302	<u>198,015</u>
Estimated Housing Growth (2015–2035)	45,361	63,070	62,858	<u>62,387</u>

Source: City of Seattle, 2017.

The alternatives also differ based on the nature of the housing capacity provided, which could lead to greater or lesser amounts of certain types of housing units. Exhibit 3.1–36 shows net capacity for housing growth by zone category, and Exhibit 3.1–37 shows a percentage breakdowns. The greatest amount of capacity in all four ~~three~~ alternatives is in the Commercial/Mixed-Use zone categories, though both DEIS action alternatives create about 35 percent greater total capacity. The Preferred Alternative includes somewhat less capacity in this category, but still 16 percent more than No Action. Most housing produced in these zone categories is in higher-density mixed-use developments, usually with retail and commercial uses at the ground floor and apartments above. Pursuant to land use policies established in the Comprehensive Plan, under all the alternatives most of the capacity for new housing would be in this type of housing. However, the action alternatives and Preferred Alternative shift some of the overall share of housing capacity into other zone categories, which may result in more variety of housing types. Both Alternative 2 and Alternative 3 more than double capacity in the Lowrise zone category, ~~increase~~ increasing the share of total capacity for housing growth in the Lowrise zone categories. The Preferred Alternative has the highest percent share in Lowrise (25 percent) among all four alternatives. The action alternatives and Preferred Alternative also provide more capacity

Exhibit 3.1–36 Net Capacity for Housing Growth by Zone Category

Zone Category	Alternative 1 No Action	Alternative 2	Alternative 3	<u>Preferred Alternative</u>
Residential Small Lot	754	3,970	4,032	<u>5,505</u>
Lowrise	20,678	49,174	42,898	<u>54,438</u>
Midrise & Highrise Residential	11,334	22,520	14,695	<u>22,648</u>
Commercial / Mixed-Use	119,563	162,558	160,677	<u>139,258</u>

Source: City of Seattle, 2017.

Exhibit 3.1–37 Percent of Total Net Capacity for Housing Growth by Zone Category

Zone Category	Alternative 1 No Action	Alternative 2	Alternative 3	<u>Preferred Alternative</u>
Residential Small Lot	0%	2%	2%	<u>2%</u>
Lowrise	14%	21%	19%	<u>25%</u>
Midrise & Highrise Residential	7%	9%	7%	<u>10%</u>
Commercial / Mixed-Use	78%	68%	72%	<u>63%</u>

Source: City of Seattle, 2017; BERK, 2017.

for housing growth in the Residential Small Lot category compared to Alternative 1 No Action. Housing types in the Lowrise and Residential Small Lot zones are more likely to be ground-related like townhouses, rowhouses, duplexes, and small single-family home structures. The action alternatives and Preferred Alternative could result in a greater share of these types of units, which are better suited to families with children and larger households compared to Alternative 1 No Action.

Commercial Development

The model used to estimate growth in each alternative includes commercial growth as well as residential growth. In zones that allow commercial uses or a mix of commercial and residential uses, the capacity for commercial development is calculated and used to estimate future job growth by urban village and throughout the study area. Where a mix of uses are allowed, the housing and job growth mix is estimated using zone-specific ratios of commercial and residential development derived from historical data. Under the action alternatives and Preferred Alternative, commercial development would generate affordable housing through MHA for commercial development. Estimating future job growth allows for calculation of the amount of affordable housing commercial development would generate through MHA-Commercial requirements. Appendix G has more detail on this methodology.

New commercial development can contribute to the need for rent and income-restricted housing. New commercial development can create new low-wage jobs, directly generating demand for housing affordable to low-income people near those jobs. New commercial development can also create new high-wage jobs, and those high-income earners can patronize other businesses that offer low-wage jobs, thereby indirectly generating demand for low-income housing. While this EIS does not quantitatively analyze the additional need for low-income housing from commercial development in each alternative, it is a consequence of commercial development and a contributing factor to the need for rent- and income-restricted housing documented in the affected environment section of this chapter.

Housing Affordability

The affordability of market-rate housing would continue to be a concern and a burden for many residents under all three DEIS alternatives and the Preferred Alternative, notwithstanding implementation of MHA. This is a result of economic forces beyond the reach of MHA. Ultimately, housing prices and rents are likely to be driven upward by demand generated by Seattle's strong job market and attractive natural and cultural amenities. Even with substantial new development capacity, Seattle's limited land area would likely continue to contribute to upward pressure on housing costs. Low vacancy rates and tight rental housing inventory contribute to higher rents, especially when demand is fueled by a highly educated, high-wage workforce. However, compared to Alternative 1 No Action, the action alternatives, and Preferred Alternative both provide more development capacity and about 37 percent greater expected housing supply. This additional capacity and supply is likely to reduce upward pressure on rents and housing prices. While this is likely to improve housing affordability at all income levels, the market is not likely to provide housing affordable to those with incomes earning below 60 percent of AMI under any alternative. As noted in Exhibit 3.1–23, most market-rate housing of any age is currently unaffordable to low- and very-low-income households (60 percent of AMI and below). More market-rate housing could reduce the competition for scarce housing among moderate-, middle-, and upper-income households, potentially making more housing available at affordable prices for moderate- and middle-income households, compared to Alternative 1 No Action, though insufficient affordable housing to meet the need for such housing among low-income households would persist. This impact of the action alternatives and Preferred Alternative is notable given the finding in Exhibit 3.1–30 that income disparity is increasing in Seattle and that the city has lost households in the moderate and middle-income levels (60–120 percent of AMI) in recent years.

The distribution of development outlined in the alternatives would also influence cost and affordability in other ways:

- **Land value:** The initial land cost for developers contributes to the total cost of each housing unit. Land values vary across the city, with the highest values found downtown and generally decreasing outward. However, land values are also affected by zoning and access to amenities. Zoning changes under the action alternatives and Preferred Alternative that increase allowed floor area ratio and density of development have potential to reduce land costs per unit.
- **Proximity to transportation and services:** Areas with the greatest proximity to neighborhood amenities, jobs, and transportation tend to

have higher land values and relatively higher housing costs. However, proximity to transit and services also provides households more transportation options that can decrease household spending on transportation.

- Construction costs:** The cost of construction influences sale and rental prices. Under all alternatives, building material costs would be roughly equal across the city, but the type of construction would not. Generally, taller buildings with steel framing are more expensive to build per square foot than shorter, wood-framed structures. However, this expense can be partially offset by lower land costs per unit since taller buildings allow for more units on the same area of land. Compared to Alternative 1 No Action, both action alternatives and the Preferred Alternative more than double the amount of land area zoned to allow building heights greater than 85 feet (the typical maximum allowed for wood frame construction). Alternative 2 includes about 10 percent more land area zoned for buildings greater than 85 feet compared to Alternative 3. Both action alternatives and the Preferred Alternative also increase the amount of land zoned for more cost-effective wood frame construction, such as Lowrise and Residential Small Lot, as shown in Exhibit 3.1–36.
- Property Tax:** Property tax increases can affect housing affordability for homeowners by contributing to housing cost burden. Increases in property tax are driven by two factors: new or increased taxes approved by local governments to fund public services, and increasing value of a home that is reflected in a higher assessed value. Homeowners benefit from increased value of their home or land because of an equity increase. However, for homeowners without the intent or ability to access increased equity by selling or refinancing, an increase in home value can be experienced as an impact due to the increased amount of annual tax due. Seniors on fixed incomes and homeowners with low credit scores are groups who may experience increasing home value as an impact. Since the primary driver of home values is high regional demand for housing, the impacts of property tax increases are expected to be similar under all alternatives.

Action Alternatives 2, 3 and the Preferred Alternative could lead to an incremental impact on housing affordability due to property tax increases in areas where zoning is changed to allow new types of development, such as multi-family in an area previously zoned single family. Market value for tax assessment is determined by analyzing recent sales of comparable properties in the same area. If purchasers are willing to pay more for land due to the ability to develop additional

housing or floor area, higher tax assessments in the area could result. The market dynamics of such a change are difficult to predict and depend on many factors including market strength of an area, and willingness of homeowners to sell. The cost of the MHA affordable housing requirement will also be accounted for in purchasers' willingness to pay and may reduce land values. There is potential for incremental cost burden for homeowners due to increased assessed property value in rezone areas, however this is not considered a significant impact because the economic dynamics are unpredictable and the increased property value also accrues economic benefits to the homeowner.

New Income-Restricted Affordable Unit Production

For low-income households, the most significant and positive impact on housing affordability will be through the production of new affordable units through MHA¹⁷ or the existing Incentive Zoning (IZ) program. The City estimated the number of new affordable units that would be generated under each alternative as well as the total number expected to be built within the study area. The word “generated” describes MHA or IZ performance units (i.e., those built on- or off-site in new market-rate buildings in the study area) and units funded with MHA or IZ payments generated by new development in the study area. The number of affordable units generated under each action alternative is the direct result of MHA implementation in the study area.

However, 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 neighborhoods would also fund affordable units in the study area under all ~~three~~ four alternatives. Therefore, this analysis also estimates the total number of new affordable units built in the study area under each alternative, including those generated by growth outside the study areas.

Exhibit 3.1–38 shows the total new affordable units expected to be generated from development in the study area and those expected to be built in the study area. While all alternatives would generate some new rent- and income-restricted units, the action alternatives and Preferred Alternative would generate about 28 times more rent- and income-

¹⁷ As described in Chapter 2, MHA includes two programs: MHA-R for residential development, and MHA-C for commercial development. Under the action alternatives and Preferred Alternative, both residential and commercial development would generate new affordable housing. See Appendix G for details.

Exhibit 3.1–38 Estimated New MHA Affordable Housing Units: Generated by Growth in the Study Area and Total Built in the Study Area, 20 Years

	New Affordable Units Generated by Growth in the Study Area	Total New Affordable Units Generated by Growth Citywide and Built in Study Area
Alternative 1 No Action	205	3,155
Alternative 2	5,717	7,513
Alternative 3	5,582	7,415
<u>Preferred Alternative</u>	<u>5,633</u>	<u>7,418</u>

Source: City of Seattle, 2017; BERK, 2017.

restricted units. Considering all affordable units built in the study area, the action alternatives and Preferred Alternative are expected to result in 135–138 percent more rent- and income-restricted housing built in the study area compared to Alternative 1 No Action.

Exhibit 3.1–38 ~~shows the estimated number of affordable units generated and built in the study area through MHA and IZ.~~ It also shows the estimated number of affordable units generated by growth citywide and built in the study area. For Alternative 1, the only affordable units generated by growth in the study area would come from the existing IZ program. The action alternatives and Preferred Alternative implement MHA in the study area, resulting in a large increase in the number of units generated by growth in the study area. These units generated include both performance units (those built on- or off-site in new market-rate buildings) and payment units. For analysis purposes, we assume that the distribution of payment units to each urban village is proportional to that urban village's share of the 20-year citywide residential growth estimate in each EIS alternative. More payment units are expected in the action alternatives and Preferred Alternative because more MHA payment funds would be collected if MHA is implemented in the study area. Alternative 1 No Action assumes MHA is implemented only in the Downtown/South Lake Union, University District, and Uptown subareas (see Chapter 2 for details). Alternative 2 is expected to result in 7,513 affordable units, the greatest amount of new affordable housing in the study area. This is 4,370 more affordable units than expected in Alternative 1 No Action. The total for Alternative 3 is just 98 units less than Alternative 2. The total for the Preferred Alternative is 7,418, or about the same as Alternative 3.

Exhibit 3.1–39 shows affordable housing units built in the study area through the performance and payment options with breakdowns by urban village and Displacement Risk and Access to Opportunity typology. The purpose of this exhibit is to provide rough estimates of the total

Exhibit 3.1–39 Estimated New Affordable Units Built by Urban Village and Displacement Risk and Access to Opportunity Typology, 20 Years

	PERFORMANCE UNITS BUILT				PAYMENT UNITS BUILT				TOTAL AFFORDABLE UNITS BUILT			
	Alt. 1	Alt. 2	Alt. 3	Pref.	Alt. 1	Alt. 2	Alt. 3	Pref.	Alt. 1	Alt. 2	Alt. 3	Pref.
High Displacement Risk & Low Access to Opportunity												
Rainier Beach	0	16	13	<u>15</u>	34	67	59	<u>63</u>	34	83	72	<u>77</u>
Othello	0	25	12	<u>13</u>	61	134	104	<u>106</u>	61	158	116	<u>120</u>
Westwood-Highland Park	0	27	18	<u>22</u>	40	92	77	<u>85</u>	40	119	94	<u>107</u>
South Park	0	16	13	<u>12</u>	27	63	53	<u>55</u>	27	80	67	<u>68</u>
Bitter Lake Village	0	31	30	<u>30</u>	88	149	146	<u>148</u>	88	179	175	<u>177</u>
Subtotal	0	115	86	<u>92</u>	250	505	439	<u>457</u>	250	620	525	<u>549</u>
Low Displacement Risk & High Access to Opportunity												
Green Lake	0	14	33	<u>28</u>	40	77	118	<u>107</u>	40	91	152	<u>135</u>
Roosevelt	15	1	12	<u>9</u>	58	97	123	<u>118</u>	73	98	135	<u>126</u>
Wallingford	0	38	69	<u>64</u>	67	137	201	<u>192</u>	67	175	270	<u>256</u>
Upper Queen Anne	0	16	20	<u>20</u>	34	58	62	<u>63</u>	34	74	83	<u>84</u>
Fremont	0	27	54	<u>49</u>	88	155	199	<u>197</u>	88	182	253	<u>246</u>
Ballard	0	107	123	<u>117</u>	270	536	564	<u>563</u>	270	644	687	<u>680</u>
Madison-Miller	0	18	32	<u>34</u>	54	115	144	<u>151</u>	54	133	177	<u>185</u>
Greenwood-Phinney Ridge	34	13	14	<u>14</u>	34	59	59	<u>60</u>	68	72	73	<u>74</u>
Eastlake	0	13	34	<u>20</u>	54	99	144	<u>109</u>	54	112	178	<u>129</u>
West Seattle Junction	0	6	10	<u>9</u>	20	37	45	<u>43</u>	20	42	56	<u>52</u>
Admiral	16	63	77	<u>67</u>	155	298	325	<u>308</u>	172	361	402	<u>376</u>
Crown Hill	0	29	63	<u>47</u>	47	111	173	<u>143</u>	47	140	236	<u>190</u>
Ravenna (2)	0	45	42	<u>46</u>	92	167	159	<u>169</u>	92	212	201	<u>215</u>
Subtotal	65	390	584	<u>523</u>	1,014	1,947	2,319	<u>2,224</u>	1,079	2,337	2,903	<u>2,746</u>
High Displacement Risk & High Access to Opportunity												
Columbia City	0	23	17	<u>20</u>	54	118	102	<u>110</u>	54	141	119	<u>130</u>
Lake City	0	23	21	<u>21</u>	67	113	111	<u>113</u>	67	137	133	<u>134</u>
Northgate	0	104	101	<u>100</u>	202	398	387	<u>392</u>	202	502	488	<u>492</u>
First Hill-Capitol Hill	0	258	115	<u>155</u>	405	1,009	704	<u>797</u>	405	1,267	819	<u>952</u>
North Beacon Hill	14	17	10	<u>14</u>	27	70	53	<u>64</u>	41	87	63	<u>78</u>
North Rainier	4	31	26	<u>25</u>	67	135	123	<u>123</u>	72	166	149	<u>148</u>
23rd & Union-Jackson	0	71	48	<u>44</u>	108	262	213	<u>214</u>	108	333	261	<u>258</u>
Subtotal	18	528	339	<u>380</u>	931	2,105	1,693	<u>1,812</u>	949	2,633	2,031	<u>2,192</u>
Low Displacement Risk & Low Access to Opportunity												
Aurora-Liction Springs	0	30	36	<u>32</u>	67	119	125	<u>122</u>	67	149	161	<u>154</u>
Morgan Junction	0	24	40	<u>28</u>	27	73	105	<u>84</u>	27	97	145	<u>111</u>
Subtotal	0	53	76	<u>60</u>	94	193	230	<u>206</u>	94	246	307	<u>266</u>
Outside Villages	12	284	271	<u>270</u>	771	1,393	1,377	<u>1,396</u>	783	1,677	1,649	<u>1,665</u>
Study Area Total	83	1,371	1,356	<u>1,325</u>	3,060	6,142	6,058	<u>6,094</u>	3,155	7,513	7,415	<u>7,418</u>

For Alternative 1, these numbers reflect affordable homes from MHA payment in areas outside of the study area and Incentive Zoning (IZ) under existing regulations in the study area. MHA estimates assume that MHA payments are allocated proportional to individual areas based on their share of citywide housing growth.

Source: City of Seattle, 2017; BERK, 2017.

quantity of new affordable housing that could be created in each urban village, including affordable housing funded from development outside the study area. Performance units are those built on-site in new market-rate buildings. For Alternative 1 No Action, performance units would be created through the existing IZ program; for the action alternatives, performance units would be created through MHA. Payment units would be built using funds from MHA in all ~~three~~ four alternatives, and additionally funds from commercial development under the existing IZ program in Alternative 1 No Action. For Alternative 1 No Action, payment units would be created using MHA payment funds generated from development in Downtown, South Lake Union, and the U District; for the action alternatives, payment units would be created using funds from development in and outside the study area. As indicated in the discussion of Exhibit 3.1–38, payment units are assumed to be distributed proportionally to urban villages based on their share of citywide growth and are not directly related to the amount of payments generated by development in the urban village.¹⁸

To demonstrate the measurable benefit of rent-restricted housing for low-income households, Exhibit 3.1–40 compares 2016 average market rents by apartment type to rents for MHA units. MHA unit rents are set by HUD based on a 60 percent of AMI household in the Seattle region.¹⁹ The savings vary considerably by unit type. An MHA studio would rent for \$356 less than the average market-rate studio, a 27 percent savings. However, a three-bedroom MHA unit would rent for about \$1,300 less than a market-rate unit, a 48 percent savings.

Exhibit 3.1–40 Market-Rate and MHA Rent Comparison of Costs

Apartment Type	Average Market Rent (Citywide)	MHA Affordable Rent	Monthly Savings if Living in an MHA Affordable Unit	% Savings Compared to Average Market Rate
Studio	\$1,305	\$949	\$356	27%
1 Bedroom	\$1,641	\$1,017	\$624	38%
2 Bedrooms, 1 Bath	\$1,863	\$1,219	\$644	35%
3 Bedrooms	\$2,715	\$1,409	\$1,306	48%

Source: Dupre+Scott, 2017; HUD, 2016; BERK, 2017.

¹⁸ Accordingly, the model assumes that the subareas outside the study area like Downtown/South Lake Union would generate the same amount of MHA payments under all alternatives, but the number of MHA affordable units built in these subareas would vary across alternatives because total MHA payments citywide and total residential growth by urban village both vary across ~~alternatives~~ alternatives.

¹⁹ MHA can also create small rental units at 40 percent of AMI and ownership units at 80 percent of AMI, but the majority are expected to be rental units at 60 percent of AMI.

Displacement

This section evaluates the potential for displacement associated with the new housing and commercial growth expected to occur under each alternative during the planning period, 2015–2035. The first part estimates the number of demolished units that could occur as a result of redevelopment activity. The second part estimates physical displacement associated with demolished units. Next, we estimate other forms of physical displacement not expected to vary by alternative. Finally, we discuss potential economic, cultural, and commercial displacement impacts.

Demolition

As discussed in 3.1.1 Affected Environment, rental and owner-occupied housing units are demolished each year in Seattle as older homes are replaced by newer buildings. Most future growth in the city, under any of the alternatives including Alternative 1 No Action, will involve redevelopment of sites with existing housing and commercial buildings; existing residents and businesses in these buildings will be displaced. Increasing growth in particular zones or urban villages can result in the redevelopment of more sites, increasing potential demolition.

Some, but not all, demolitions result in the displacement of low-income households. This section estimates total demolitions in the study area by the Displacement Risk and Access to Opportunity typology and compares them to net new and affordable unit production. The following section draws on historical trends to estimate the number of physically displaced low-income households as a result of demolition.

Demolitions associated with each alternative fall into three categories. First, there are demolitions for which permits have been issued by the City up to 2015, some of which have occurred. These demolitions have occurred or will occur under all alternatives and are associated with approved building permits that are therefore not subject to MHA requirements. The number of demolitions in this category reflects the rapid pace of growth in recent years and permits in the pipeline.

Second, there are demolitions associated with growth that has not yet been permitted. Estimating the number of demolitions in this category is more difficult. Two different methods are used to provide a range of possible outcomes:

- **Parcel allocation model:** This demolition estimate comes from a redevelopment model that allocates future growth to specific parcels

identified as redevelopable. The number of existing housing units on those parcels is the estimate of demolished units resulting from growth in those urban villages. This method was used to evaluate the three DEIS alternatives.

- **Historical growth trends:** This demolition estimate reflects the historical ratio of net new housing units to demolished units based on actual permit data from 2010–2016 for each zone in Seattle.

Predicting exactly where and when redevelopment will occur is impossible. Including both estimates provides context. The parcel allocation model is based on a detailed parcel-scale analysis; however, it makes assumptions about which parcels are likely to be available for redevelopment. The historical trends method reflects actual recent development trends citywide, but it ignores current conditions in each neighborhood as well as changes in development capacity under the action alternatives. For a more detailed discussion of these methods, see Appendix G.

The third category of demolitions are those expected to occur in Single Family zones with no net gain in housing production. In recent years, 32 percent of demolished units in Seattle outside of downtown have been in Single Family zones, wherein an existing single-family home is replaced by a new single-family home. Both action alternatives rezone areas currently zoned Single Family. An accurate comparison of alternatives must also estimate the number of demolitions that would occur in these single-family areas under Alternative 1 No Action. Between 2007 and 2016, an average of 10.4 demolitions occurred in the proposed rezone areas per year. This analysis assumes that this rate of demolitions would continue under Alternative 1 No Action until 2035. For more detail, see Appendix G.

Exhibit 3.1–41 estimates the number of units that may be demolished in the study area under each alternative between 2015 and 2035 compared to net new units ~~built: market-rate and MFTE,²⁰ and affordable units produced through either IZ or MHA.~~ According to estimates generated using the parcel allocation model, the action alternatives are expected to result in fewer demolitions than Alternative 1 No Action. This is due in part to the expected number of demolitions in Single Family zones that would result in no net gain in housing. However, the historical trends estimates indicate that both action alternatives and Preferred Alternative would result in slightly more demolitions in the study area than Alternative 1 No Action. The rightmost column shows the ratio of net new units to demolished units. This ratio is higher in the action alternatives

²⁰ The Multifamily Tax Exemption (MFTE) program is described in under Mitigation Measures in 3.1.3 Mitigation Measures.

Exhibit 3.1–41 New Housing Growth Compared to Demolished Units, 2015–2035

AREA TYPOLOGY		DEMOLISHED UNITS				
Displacement Risk	Access to Opportunity	Net New Units Built	Already Permitted	Additional (Parcel Allocation Model Estimates)	Additional (Historical Trends Estimates)	Ratio of Net New to Demolished Units*
Alternative 1 No Action						
High	High	13,800	461	229	715	10
Low	High	15,028	319	719	810	11
High	Low	3,700	63	217	401	6
Low	Low	1,400	33	227	292	3
Outside Urban Villages		11,433	358	246	680	9
Total in Study Area		45,361	1,234	1,638	2,898	10
Alternative 2						
High	High	21,925	461	366	1,037	14
Low	High	19,839	319	828	920	16
High	Low	5,143	63	60	288	14
Low	Low	1,963	33	98	121	13
Outside Urban Villages		14,199	358	68	665	14
Total in Study Area		63,070	1,234	1,420	3,030	14
Alternative 3						
High	High	17,899	461	90	777	14
Low	High	23,880	319	1,271	1,188	15
High	Low	4,520	63	82	248	14
Low	Low	2,373	33	122	149	13
Outside Urban Villages		14,186	358	17	661	14
Total in Study Area		62,858	1,234	1,582	3,023	14
Preferred Alternative						
High	High	18,885	461	Demolition estimate expected to be within the range of Alternatives 2 and 3.**	841	16
Low	High	22,592	319		1,098	17
High	Low	4,644	63		255	16
Low	Low	2,088	33		129	14
Outside Urban Villages		14,179	358		657	15
Total in Study Area		62,387	1,234		2,980	16

* Notes: Estimates of additional demolished units were developed using two different methods described in Appendix G. Ratio of net new to demolished units is based on the already permitted demolitions plus the historical trends estimate of additional demolitions.

** The Preferred Alternative includes growth estimates by urban village are (with a few minor exceptions) within the range of growth expected in Alternatives 2 and 3. Similarly, the zoning and built capacity changes are also (with a few minor exceptions) within the range of those in Alternatives 2 and 3. Therefore the amount of demolition expected in the Preferred Alternative is also expected to be within the range of Alternatives 2 and 3.

Source: City of Seattle, 2017; BERK, 2017.

compared to Alternative 1 No Action. This means each unit demolished would result in more new housing under the action alternatives than under Alternative 1 No Action. The Preferred Alternative ratio of net new units to demolished units is higher still than the DEIS action alternatives. Similarly, when compared to the estimates of new affordable housing generated in the study are (Exhibit 3.1–38) the The action alternatives and Preferred Alternative are also expected to provide significantly more new affordable housing units than the number of units to be demolished.

The demolition estimates presented above are for a 20-year timespan. Per year, Alternative 1 No Action is expected to result in between 82 and 145 demolished units within in study area beyond what is already permitted. Alternative 2 is expected to result in between 71 and 151 demolished units per year. Alternative 3 is expected to result in between 79 and 151 demolished units.

Physical Displacement of Low-Income Households Due to Demolitions

As noted above, some but not all housing units estimated to be demolished by the year 2035 are likely to result in the physical displacement of low-income households. Drawing upon the TRA0 analysis in 3.1.1 Affected Environment, we estimate the number of low-income households who could be displaced due to demolitions. Exhibit 3.1–29 presents the ratio of TRA0-eligible households with demolition as reason for displacement to total permitted demolitions by Displacement Risk and Access to Opportunity typology. Exhibit 3.1–42 uses these same ratios and the demolition estimates presented above to estimate physically displaced households with incomes at or below 50 percent of AMI between 2015 and 2035. This table focuses solely on displacement associated with estimated demolitions not already permitted by the City. Already-permitted demolitions do not differ among the alternatives and would not be subject to MHA under any alternative. Removing them from this analysis also allows for better comparison to affordable unit production. As noted in the analysis of TRA0 data, these numbers do not reflect displacement of households with incomes above 50 percent of AMI or households who should have received TRA0 but did not for various reasons.

The historical trends estimates for both action alternatives and the Preferred Alternative would result in more low-income households experiencing physical displacement than Alternative 1 No Action. This is consistent with the expected number of demolished units in each alternative. However, in all ~~three~~ four alternatives, the number of new affordable units built would exceed the number of displaced low-income

Exhibit 3.1–42 Estimated Physically Displaced Low-Income Households Due to Demolitions
Compared to Affordable Units Built, 2015–2035

**DISPLACED HOUSEHOLDS ≤50%
OF AMI DUE TO DEMOLITIONS
NOT ALREADY PERMITTED**
AREA TYPOLOGY

Displacement Risk	Access to Opportunity	Assumed % of Demolished Units Resulting in Displacement*	Parcel Allocation Model Estimate	Historical Trend Estimate	New Affordable Units Built IZ or MHA	Ratio of Affordable Units to Displaced Households ≤50% of AMI
Alternative 1 No Action						
High	High	26%	59	185	949	5
Low	High	19%	136	154	1,079	7
High	Low	12%	26	49	250	5
Low	Low	7%	16	20	94	5
Outside Urban Villages		17%	41	113	783	7
Total in Study Area			278	520	3,155	6
Alternative 2						
High	High	26%	94	268	2,633	10
Low	High	19%	157	175	2,337	13
High	Low	12%	7	35	620	18
Low	Low	7%	7	8	246	29
Outside Urban Villages		17%	11	110	1,677	15
Total in Study Area			277	596	7,513	13
Alternative 3						
High	High	26%	23	201	2,031	10
Low	High	19%	241	225	2,903	13
High	Low	12%	10	30	525	17
Low	Low	7%	8	10	307	30
Outside Urban Villages		17%	3	110	1,649	15
Total in Study Area			286	576	7,415	13
Preferred Alternative						
<u>High</u>	<u>High</u>	<u>26%</u>	<u>Displacement estimate expected to be within the range of Alternatives 2 and 3.**</u>	<u>217</u>	<u>2,192</u>	<u>10</u>
<u>Low</u>	<u>High</u>	<u>19%</u>		<u>208</u>	<u>2,746</u>	<u>13</u>
<u>High</u>	<u>Low</u>	<u>12%</u>		<u>31</u>	<u>549</u>	<u>18</u>
<u>Low</u>	<u>Low</u>	<u>7%</u>		<u>9</u>	<u>266</u>	<u>30</u>
Outside Urban Villages		17%		109	1,665	15
Total in Study Area				574	7,418	13

* Notes: Assumed percentage of demolitions is based on historical ratio of TRAO eligible households with demolition as the reason for displacement compared to total demolitions, by area category of city. Displaced household estimates are based on low and high estimated of demolitions, by area category, exclusive of demolitions already permitted to occur. Ratio of affordable units to displaced households is based on the high estimate of displaced households.

** See note under Exhibit 3.1–41.

Source: City of Seattle, 2017; BERK, 2017.

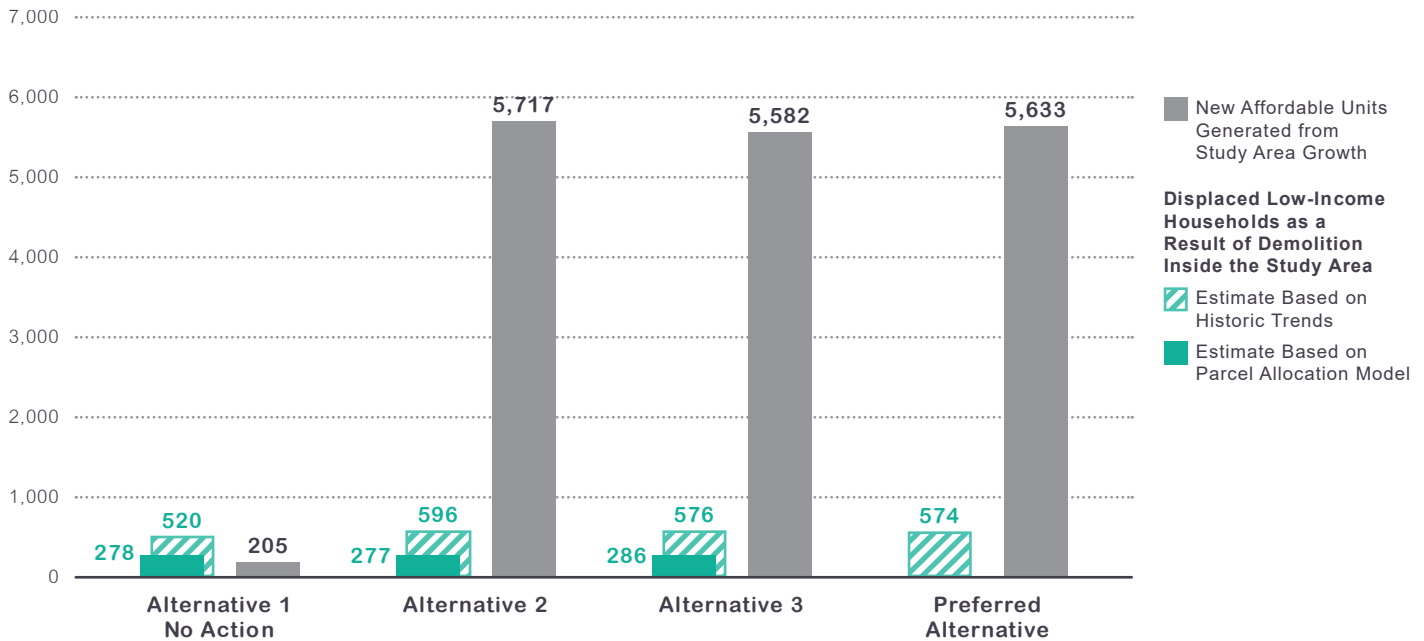


Exhibit 3.1–43 New MHA and IZ Affordable Units Generated Compared to Displaced Low-Income Households due to Demolition in the Study Area

Notes: All estimates are for the period 2017–2035. Displacement estimates exclude those related to units already permitted for demolition. Displacement estimated based on parcel allocation model is not available for Preferred Alternative. But estimate would be expected to be within the range of Alternatives 2 and 3.

Source: City of Seattle, 2017; BERK, 2017.

households by a large margin. The rightmost column shows the ratio of new affordable units to the higher historical trend estimate of displaced low-income households. It shows that the action alternatives and Preferred Alternative would provide 13 new affordable housing units in the study area for each low-income household displaced. Alternative 1 No Action provides six new affordable units per displaced low-income household.

The comparison of estimated physically displaced-low income households to new affordable units built in Exhibit 3.1–42 provides a sense of impacts as they may be experienced at the neighborhood scale. Another way to evaluate impacts is to compare the same displacement estimates to the total impact of the alternatives on affordable housing production citywide. Exhibit 3.1–43 visualizes this comparison. This chart includes the number of new affordable units generated from growth inside the study area. Alternative 1 No Action is expected to generate significantly less new affordable housing in the study area than either estimate of displaced low-income households. Both action alternatives and the Preferred Alternative are expected to generate nearly 10 times more new affordable housing than the higher historical trends estimate of displaced low-income households.

Other Forms of Physical Displacement

As noted above, demolition is only one cause of physical displacement. For instance, property owners may terminate or discontinue the lease of renters in order to renovate an existing unit or change the use of the unit. The alternatives are not expected to have any difference in impacts to these kinds of displacement. However, these kinds of displacement are expected to continue in the future.

As shown previously in Exhibit 3.1–28, TRAO data provides some limited insight into the extent of these kinds of displacement. Additional analysis of TRAO records of displacement that occurred within the study area between 2013 through 2016 indicates that an average of 33 households with income 50 percent of AMI or below are displaced per year for these two reasons. But the number has been increasing over this short period of time. In 2016, 93 low-income households were displaced for these reasons. Nearly all were associated with renovation/rehabilitation permits.

Exhibit 3.1–44 shows the cumulative expected physical displacement of low-income households (income 50 percent of AMI or less) expected during the 20-year planning period, inclusive of displacement due to demolition, renovation, or change of use. The exhibit also includes displacement due to demolitions that are already permitted. The result is a more conservative estimate of physical displacement of low-income households. The total number of low-income households displaced for these reasons is slightly higher under the action alternatives and Preferred Alternative when using the historical trend estimate of demolitions. However, the total amount is still substantially less than the number of new affordable units expected to be generated during the same time period.

Economic Displacement

The impacts of the ~~three~~ four alternatives on economic displacement are difficult to quantify. However, previous academic research as well as analysis findings discussed in 3.1.1 Affected Environment are relevant to an evaluation of potential impacts. The review of the academic research literature in Appendix I suggests that the increased housing supply provided in Alternatives 2, ~~and 3,~~ and the Preferred Alternative is likely to reduce upward pressure on market-rate housing costs and reduce economic displacement in the city and region overall when compared to Alternative 1 No Action. This research finding is supported by the

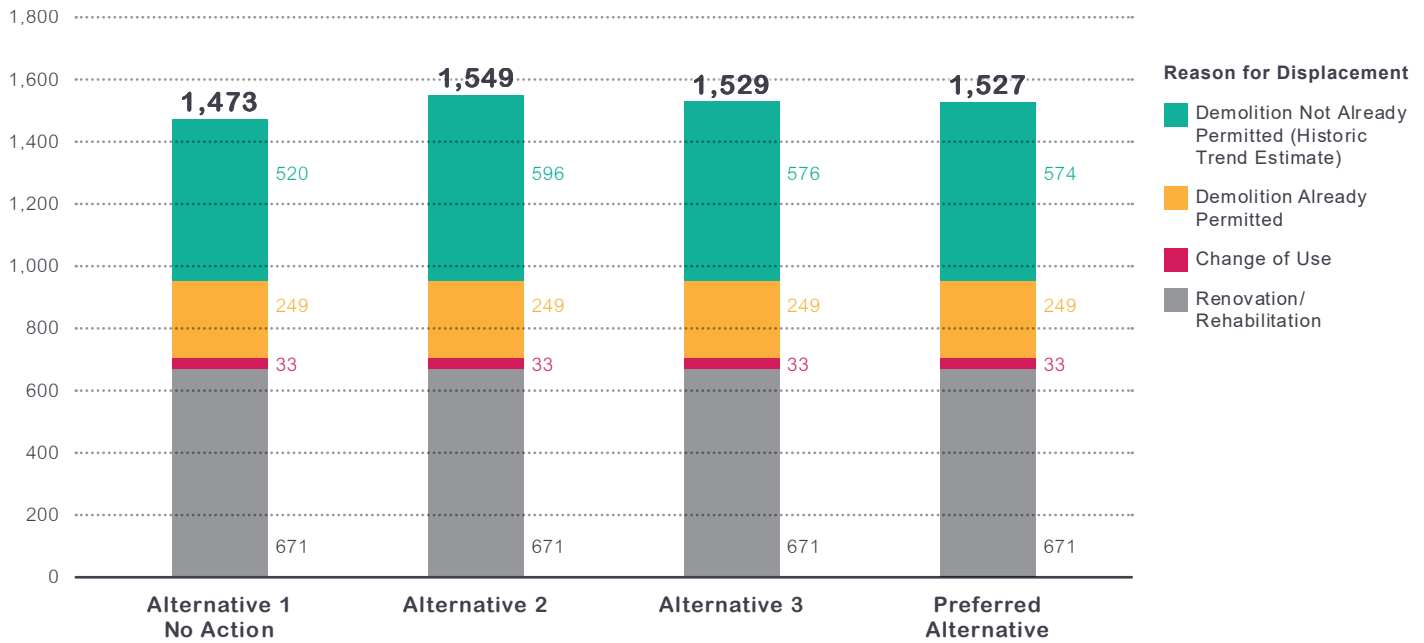


Exhibit 3.1–44 Cumulative Estimate of Household 50% of AMI or Less Displaced Due to Demolition, Renovation, or Change of Use, 2015–2035

Source: City of Seattle, 2017; BERK, 2017.

historical analysis of average apartment rents in Seattle shown in Exhibit 3.1–21, which shows that rents stabilize or decline during periods of high vacancy and increase during periods of low vacancy. The findings in the academic research are also supported by the historical analysis of evidence of potential economic displacement shown in Exhibit 3.1–33, which finds that Seattle neighborhoods with more total housing production were somewhat more likely to see gains in low-income households. This same relationship is found among census tracts in all Displacement Risk and Access to Opportunity categories, and it is also found after accounting for change in households that receive federal housing assistance subsidized housing production during the same period. However, not all tracts show outcomes conforming to this general pattern.

Prior research has also found that the provision of subsidized housing is associated with a decrease in displacement (Zuk and Chapple 2016). This finding suggests that Alternatives 2, and 3, and the Preferred Alternative, which generate substantially more income-restricted affordable units, will reduce future economic displacement compared to Alternative 1 No Action.

Prior research reviewed in Appendix I also indicates that neighborhoods with greater variety of housing types are more likely to provide housing affordable to low-income households. The increased capacity for development in Lowrise and Residential Small Lot zones in Alternatives 2 and 3 has the potential to increase the diversity of housing types in neighborhoods throughout the study area, providing more housing options for more kinds of households. This too has potential to decrease economic displacement pressures.

Impacts at the neighborhood scale could vary from expected impacts for the city as a whole. New development can come with or precipitate amenities that increase demand for housing in a particular neighborhood, potentially increasing housing costs and increasing localized economic displacement. For this reason, there is potential that localized economic displacement pressures could vary by alternative.

Cultural Displacement

Evaluating the potential impacts of the alternatives on cultural displacement is difficult, but reviewing the dynamics of cultural displacement can provide information about potential impacts. ~~However,~~ eCultural displacement is often precipitated by, and related to, physical and economic displacement. The findings outlined above for direct and economic displacement are also relevant to understanding the potential impacts on cultural displacement.

New development may have direct impacts on existing cultural institutions and businesses through demolition of commercial buildings. ~~But it can also increase the supply of commercial space. This additional supply would be expected to reduce competition for commercial space and the associated upward pressure on rents. This could have the impact of reducing the potential for the economic displacement of existing cultural intuitions and businesses.~~

Commercial Displacement

While this chapter focuses on residential displacement, it is important to note that businesses, institutions, and cultural anchors are also susceptible to displacement due to market pressures. Commercial displacement (including displacement of institutions and cultural facilities) is harder to quantify than residential displacement. Like a household, a business or gathering place can be physically displaced due to demolition. But while we know the number of housing units on

a given parcel, data about the number, type, or other characteristics of businesses spaces across all redevelopment parcels citywide is not available. Small businesses and cultural gathering places are also vulnerable to economic displacement and may be pressured to relocate when rents increase. Yet this is hard to predict because, like households whose income may fluctuate, struggling businesses may also need to relocate even if rents haven't changed.

Physical and economic displacement of households can also precipitate commercial displacement. This is especially true in cultural racial and ethnic minority communities ~~and communities of color~~ where culturally related businesses may struggle if their customer base can no longer afford to live in the neighborhood. Likewise, as discussed in 3.1.1 Affected Environment, displacement of small businesses, religious, and community gathering places, and other cultural institutions ~~displacement~~ can also further destabilize communities of marginalized populations, particularly racial and ethnic minorities.

Distinct from direct and economic displacement analyzed above, there are several ways cultural displacement, can be linked to greater amounts of housing or job growth.

- **Sensitivity to loss of culturally significant businesses or institutions:** As discussed in 3.1.1 Affected Environment, households in racial and ethnic minority communities may place a greater emphasis on the presence of cultural institutions and businesses in their location decision. Participating in the normal marketplace requires explicit cultural sacrifices. For example, people who intend to keep strictly halal or kosher would face limitations to social participation without the presence of cultural businesses. Therefore, loss of even a single cultural business or community institution can magnify cultural displacement impact because of an increased likelihood of subsequent household relocation decisions.
- **Changes in mores and norms:** Introduction of more households or employees in a neighborhood due to development—even when the development causes no direct physical displacement—may disrupt social cohesion of racial and minority communities and contribute to cultural displacement. New residents, employees, and business operators in new developments may have different expectations with regard to noise, aesthetics, language, and other aspects of everyday life. When the presence of new residents changes these mores and norms, existing racial and ethnic minority communities

may feel pressure to relocate. They may also be explicitly threatened by newcomers and the resultant power exchanges (O'Neil, 2017). Frequently these types of interactions are underlined with implicit threats of police or code enforcement actions.

- **Loss of place value:** When members of ethnic and cultural minority communities relocate, the loss of place value is greater than for other communities. Limited alternative locations exist in the region where the cultural businesses, institutions, and culturally significant social supports are present. Therefore, greater social cost results when ethnic and cultural communities relocate than for relocation of mainstream cultural households.

While limited data availability and the complexity of these phenomena make them very difficult to quantify, we can consider the relative likelihood of cultural displacement of racial and ethnic and minority communities that could occur under the alternatives by simply comparing the amount of new residential and commercial development in the areas of the city with highest shares of ethnic and racial minority populations. This assumes that cultural displacement of racial and ethnic minorities is more likely in these neighborhoods due to threat of direct displacement of minority-owned businesses or cultural institutions, and that this threat is independent of direct or economic displacement. The Assessment of Fair Housing (City of Seattle, 2017b) identifies census tracts with sizable shares of multiple racial/ethnic groups, including foreign-born populations as a percentage share of the population. Eight urban villages within those areas are shown in Exhibit 3.1–45 along with growth expected under each alternative. residential displacement is a helpful for proxy for understanding where commercial displacement might be more likely.

Comparing the total amounts of housing and job growth shows that every action alternative would result in more housing and job growth in urban villages with high percentage shares of racial and ethnic minority populations, and therefore the action alternatives are likely to cause relatively more cultural displacement of racial and ethnic minority populations than Alternative 1 No Action. Of the action alternatives, Alternative 2 would have the most growth in these communities and therefore slightly higher likelihood of cultural displacement than Alternative 3 or the Preferred Alternative. The Preferred Alternative would result in an amount of housing growth between Alternatives 2 and 3, and about the same number of new jobs as Alternative 3.

Exhibit 3.1–45 Total 20-Year Housing Growth Urban Villages with High Percentage Share Racial and Ethnic Minority Populations

Urban Village	HOUSING				JOBS			
	Alt. 1	Alt. 2	Alt. 3	Pref.	Alt. 1	Alt. 2	Alt. 3	Pref.
Rainier Beach	500	681	607	653	500	568	542	559
Othello	900	1,361	1,072	1,186	800	832	829	848
Westwood–Highland Park	600	939	790	865	100	114	105	113
South Park	400	646	550	462	300	313	313	313
Columbia City	800	1,205	1,049	1,217	800	903	870	896
North Beacon Hill	400	712	544	683	300	312	309	330
North Rainier	1,000	1,378	1,267	1,303	3,100	3,609	3,600	3,542
23rd & Union–Jackson	1,600	2,668	2,195	2,272	1,000	1,132	1,132	1,103
Total	6,200	9,590	8,074	8,641	6,900	7,783	7,700	7,704

Source: City of Seattle, 2017.

New to the FEIS

FEIS Exhibit 3.1–45 is new since issuance of the DEIS

Note that under all alternatives housing and job growth is expected to occur over the 20-year period, and some cultural displacement of ethnic and cultural minority communities could result. The action alternatives result in a relatively small increment of growth in these communities compared to No Action. 72 percent of the Preferred Alternative's residential growth would occur over the 20-year period under Alternative 1 No Action, and 90 percent of the Preferred Alternative's job growth would occur under Alternative 1 No Action.

There is also the possibility that increased commercial development in an area could reduce competition for commercial space and associated upward pressure on rents. This could have the impact of reducing the potential for economic displacement of existing cultural institutions and businesses. Furthermore, Affordable housing developments supported by MHA may have a commercial component in mixed use development which could also provide space for local businesses. From this perspective, the relationship between growth and cultural displacement can vary and is context dependent.

Key Findings—Impacts Common to All Alternatives

Housing Supply

- All ~~three~~ four alternatives have sufficient capacity to accommodate planned growth. 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 provide greater housing capacity and supply lowrise, midrise and residential small lot housing. They also provide a greater share of total housing supply in these housing categories, which has potential to diversify the supply of new housing. The Preferred Alternative provides even greater supply in these categories, and had the greatest potential to provide for a diversity of housing options.

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 rent- and income-restricted units in the study area, the action alternatives and Preferred Alternative would generate about 28 times more rent- and income-restricted units than Alternative 1 No Action.
- Considering the distribution of total citywide MHA payments, including from development outside the study area, the action alternatives and Preferred Alternative would result in about 135 to 138 percent more rent- and income-restricted units built in the study area compared to Alternative 1 No Action.
- MHA affordable units would provide benefits to low-income households in the form of savings of 27-48 percent from the current average market price for rental housing.
- 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.
- In Alternatives 2 and 3 and the Preferred Alternative, about 10 rent- and income-restricted units would be generated from growth in the study area for every low-income household (under 50 percent of AMI) physically displaced due to demolition. Alternative 1 No Action would generate far fewer affordable units than Alternatives 2 and 3—and fewer affordable units than low-income households physically displaced due to demolition.
- Based on assumptions about the distribution of affordable units funded using citywide MHA payments, including from development outside the study area, about 13 new affordable units would be built in the study area in Alternatives 2 and 3 and the Preferred Alternative, for every low-income household (under 50 percent of AMI) physically displaced due to demolition, compared to six under Alternative 1 No Action.
- 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.
- 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.

IMPACTS OF ALTERNATIVE 1 NO ACTION

Housing Supply

Maintaining current zoning, maximum height limits, and maximum FAR limits in the study area would provide enough theoretical capacity for household growth in the study area to accommodate population projected in Seattle 2035. This alternative is expected to result in 45,361 net new housing units, about 37 percent less than the action alternatives.

Affordable Housing

Housing affordability challenges in Seattle are likely to persist, particularly for low- and moderate-income households. Alternative 1 No Action would not implement MHA in the study area and would result in substantially less affordable housing than the action alternatives. Alternative 1 is expected to add 3,155 new affordable units located throughout the study area as a result of MHA payments generated from development outside the study area and the existing IZ program. This is about 58 percent less new affordable housing than Alternative 2 and 57 percent less than Alternative 3.

Displacement

Physical displacement of between 278 and 520 low-income households could occur in the study area due to the demolition of existing housing units to provide for expected redevelopment. The lower estimate is slightly higher than expected under the action alternatives, while the high estimate is slightly lower than expected under the Action Alternatives. While all alternatives are expected to result in similar amount of displacement, Alternative 1 No Action would result in substantially fewer new affordable units and less market-rate housing supply per displaced household. Additionally, the smaller growth in housing supply compared to the action alternatives could result in greater upward pressure on housing costs and additional economic displacement under Alternative 1 No Action.

The smaller amount of total growth expected in Alternative 1 No Action, particularly in urban villages with high percentage share of racial and ethnic minority populations, has potential to result in less cultural displacement pressure than the action alternatives and Preferred Alternative.

IMPACTS OF ALTERNATIVE 2

Housing Supply

Alternative 2 would increase capacity for new housing growth compared to Alternative 1 No Action. This alternative is expected to result in 63,070 net new housing units, 39 percent more than expected under Alternative 1 No Action and roughly the same as Alternative 3. It also provides the greatest capacity for low-rise and residential small lot housing, and therefore has the greatest potential to provide for additional family-sized housing supply.

As shown in Exhibit 3.1–46, the greatest share of new housing growth (21,925 units, or about 35 percent) is expected in areas with high displacement risk and high access to opportunity. Slightly less housing growth (19,839 units, about 32 percent) would be in areas with low displacement risk and high access to opportunity. Compared to Alternative 3, Alternative 2 would have about 14 percent more total housing units in high displacement risk and low access to opportunity areas like Rainier Beach, Othello, and Westwood–Highland Park. Conversely, Alternative 2 would have about 17 percent less total new housing in areas with low displacement risk and high access to opportunity like Green Lake, Wallingford, and Madison–Miller. Average housing prices in these areas tend to be among the city’s highest, and therefore they are places where additional market-rate housing could moderate high competition for housing for moderate- and high-income households.

Exhibit 3.1–46 Estimated Total Net New Housing Units by Alternative

	Alternative 1 No Action	Alternative 2	Alternative 3	<u>Preferred Alternative</u>
High Displacement Risk & High Access to Opportunity	13,800	21,925	17,899	<u>18,885</u>
Low Displacement Risk & High Access to Opportunity	15,028	19,839	23,880	<u>22,562</u>
High Displacement Risk & Low Access to Opportunity	3,700	5,143	4,520	<u>4,644</u>
Low Displacement Risk & Low Access to Opportunity	1,400	1,963	2,373	<u>2,088</u>
Outside Urban Villages	11,433	14,199	14,186	<u>14,179</u>
Total in Study Area	45,361	63,070	62,858	<u>62,387</u>

Source: City of Seattle, 2017.

Housing Affordability

Increasing housing supply has the potential to reduce upward pressure on housing costs and moderate continued increases in average market rents. However, housing affordability challenges are expected to persist, particularly for low- and moderate-income households.

Alternative 2 would implement MHA in the study area, linking new development to the production of new affordable units. This would contribute to the production of 7,513 new affordable units, about 4,358 more affordable units in Alternative 1 No Action, an increase of 138 percent. Total production of affordable units would be just slightly higher than Alternative 3, 98 additional units.

Similar to the differences in the distribution of total new housing supply, 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 2.²¹ This would increase the number of low-income households able to find affordable housing in areas with high displacement risk areas 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 areas like Green Lake,

Exhibit 3.1–47 Estimated Total MHA and IZ Affordable Housing Units by Displacement Risk and Access to Opportunity

	Alternative 1 No Action	Alternative 2	Alternative 3	Preferred Alternative
High Displacement Risk & High Access to Opportunity	949	2,633	2,031	<u>2,192</u>
Low Displacement Risk & High Access to Opportunity	1,079	2,337	2,903	<u>2,746</u>
High Displacement Risk & Low Access to Opportunity	250	620	525	<u>549</u>
Low Displacement Risk & Low Access to Opportunity	94	246	307	<u>266</u>
Outside Urban Villages	783	1,677	1,649	<u>1,665</u>

Source: City of Seattle, 2017.

²¹ As noted in Chapter 2, the distribution of affordable units from MHA payment are more difficult to predict. The alternatives assume that MHA payment units will be distributed according to each urban village's share of total citywide residential growth.

Wallingford, Madison–Miller, and Ballard. This would result in fewer affordable housing opportunities in neighborhoods where housing costs are among the city's highest and access to opportunity is high.

Displacement

Alternative 2 is expected to result in the physical displacement of between 277 and 596 low-income households due to demolition of housing units that is not already permitted. The higher estimate is about 15 percent greater than expected under Alternative 1, but the lower estimate is slightly lower than expected under Alternative 1 No Action. 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 more displacement in areas with high displacement risk.

Compared to Alternative 1 No Action, the additional housing supply in Alternative 2 is expected to reduce upward pressure on market-rate housing costs. Alternative 2 would also generate significantly more income-restricted affordable housing than Alternative 1 No Action. As a result, Alternative 2 is expected to reduce economic displacement compared to Alternative 1 No Action.

To summarize, throughout the city as a whole, there is little difference between Alternative 2 and Alternative 3 in the amount of expected physical displacement of low-income households. Alternative 2 focuses more growth in urban villages with high displacement risk and high access to opportunity. The 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.

IMPACTS OF ALTERNATIVE 3

Housing Supply

Alternative 3 would increase capacity for new housing growth compared to Alternative 1 No Action. Alternative 3 is expected to result in 62,858 net new housing units, 39 percent more than expected in Alternative 1 No Action and roughly the same as Alternative 2. The greatest share of new housing growth (about 38 percent) would occur in areas with low displacement risk and high access to opportunity like Green Lake, Wallingford, Madison–Miller, and Ballard. As noted above, Alternative 3 would yield more total housing than Alternative 2 in these areas. Given the strong housing demand in these neighborhoods, additional housing could result in more housing opportunities and less upward pressure on housing costs in these areas.

In Alternative 3, about 29 percent of housing growth would occur in areas with high displacement risk and high access to opportunity, such as First Hill–Capitol Hill, North Beacon Hill, and Northgate. This is more than 4,000 fewer total housing units in these areas compared to Alternative 2. Additional housing supply in these neighborhoods could have positive effects because it could reduce competition for market-rate housing, particularly among households in the middle- and upper-income groups. Alternative 3 provides less new housing supply in these areas that could moderate upward pressure on housing costs than expected under Alternative 2. This expected outcome is a result of an intentional guiding of additional growth capacity to urban villages with low displacement risk.

Compared to Alternative 2, Alternative 3 would yield more than 600 fewer total housing units in urban villages with high displacement risk and low access to opportunity, such as Rainier Beach, Othello, and South Park.

Housing Affordability

Increasing housing supply has the potential to help reduce upward pressure on housing costs and moderate increases in average market rents. However, housing affordability challenges are expected to persist, particularly for low and moderate income households.

Alternative 3 would implement MHA in the study area, linking all new development in the study area to the production of new affordable units. This is expected to contribute to the production of 7,415 new affordable units, or 4,260 more affordable units than expected in Alternative 1 No

Action, an increase of 135 percent. Total production of affordable units in Alternative 3 would be 98 units fewer than 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, based on assumed distribution based on an urban village’s share of citywide residential growth.²² 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.

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 Northgate, compared to Alternative 2. Income-restricted affordable housing in these locations would have a positive housing impact because it makes housing available to low-income households in areas with high access to opportunity but where housing costs are increasing. Many of these neighborhoods also have historically high percentages of people of color. It may be concluded, therefore, that Alternative 3 provides weaker affordable housing benefits to low-income households in high displacement risk and high access to opportunity areas than Alternative 2.

Displacement

Alternative 3 is expected to result in the physical displacement of between 286 and 576 low income households due to demolition of housing units that is not already permitted. The higher estimate is about 11 percent greater than expected under Alternative 1, but the lower estimate is slightly lower than expected under Alternative 1. As noted above, Alternative 3 is expected to result in a similar total number of physically displaced low income households as is expected in Alternative 2. By focusing less growth in areas with high displacement risk and high access to opportunity, Alternative 3 is expected to result in less physical displacement of low-income households in these areas. As noted above, this is an expected outcome of intentional guiding of additional growth capacity, and therefore expected housing growth, to urban villages with low displacement risk.

²² As noted in Chapter 2, the distribution of affordable units from MHA payment are more difficult to predict. The alternatives assume that MHA payment units will be distributed according to each urban village’s share of total citywide residential growth.

The greater housing supply compared to Alternative 1 is expected to reduce upward pressure on market-rate housing costs and therefore also reduce pressures that cause economic displacement. Likewise, the greater supply of new affordable units is also expected to reduce the economic displacement of low-income households compared to Alternative 1.

To summarize, throughout the city as a whole there is little difference between Alternative 3 and Alternative 2 in the amount of expected physical displacement of low-income households. Alternative 3 focuses less growth in urban villages with high displacement risk and high access to opportunity. 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.

IMPACTS OF THE PREFERRED ALTERNATIVE

Housing Supply

The Preferred Alternative would increase capacity for new housing growth compared to Alternative 1 No Action. It is expected to result in 62,387 net new housing units, 38 percent more than expected in Alternative 1 No Action and just one percent less than Alternatives 2 and 3. The greatest share of new housing growth (about 36 percent) would occur in areas with low displacement risk and high access to opportunity like Green Lake, Wallingford, Madison–Miller, and Ballard. This is slightly lower than Alternative 3 and higher than Alternative 2 or Alternative 1 No Action. Given the strong housing demand in these neighborhoods, additional housing could result in more housing opportunities and less upward pressure on housing costs in these areas.

In the Preferred Alternative, about 30 percent of housing growth would occur in areas with high displacement risk and high access to opportunity, such as First Hill–Capitol Hill, North Beacon Hill, and Northgate. This is about 3,000 fewer total housing units in these areas compared to Alternative 2 and about 1,000 more than Alternative 3. Additional housing supply in these neighborhoods could have positive effects because it could reduce competition for market-rate housing, particularly among households in the middle- and upper-income groups. The Preferred Alternative provides less new housing supply in these areas that could moderate upward pressure on housing costs than expected under

New to the FEIS

Impacts of the Preferred Alternative is a new section since issuance of the DEIS

Alternative 2. This expected outcome is a result of moderating growth capacity increases in urban villages with high displacement risk.

Compared to Alternative 2, the Preferred Alternative would yield about 500 fewer total housing units in urban villages with high displacement risk and low access to opportunity, such as Rainier Beach, Othello, and South Park. Compared to Alternative 3, the Preferred Alternative would yield about 100 more units in these areas.

Finally, the Preferred Alternative includes greater capacity in residential small lot and lowrise zones than any of the other alternatives. As a result, it has the greatest potential among the alternatives to support greater housing diversity, including family-sized housing formats such as townhomes and small lot single family homes.

Housing Affordability

Increasing housing supply has the potential to help reduce upward pressure on housing costs and moderate increases in average market rents. However, housing affordability challenges are expected to persist, particularly for low and moderate income households.

The Preferred Alternative would implement MHA in the study area, linking all new development in the study area to the production of new affordable units. This is expected to contribute to the production of 7,418 new affordable units, about the same as Alternative 3 and 95 units less than Alternative 2. The Preferred Alternative is expected to contribute about 4,260 more affordable units than expected in Alternative 1 No Action.

Displacement

The Preferred Alternative is expected to result in about the same range of low-income household physical displacement impacts as Alternative 2 and Alternative 3 due to demolition of housing units that is not already permitted. The higher estimate is about 10 percent greater than expected under Alternative 1. The lower estimate of physical displacement is expected to be within the range of Alternatives 2 and 3, which are both lower than Alternative 1 No Action.

By focusing less growth in areas with high displacement risk and high access to opportunity, the Preferred Alternative is expected to result in less physical displacement of low-income households in these areas than would be the case under Alternative 2, and just slightly higher than Alternative 3. As noted above, this is an expected outcome of moderating growth capacity within urban villages that have higher displacement risk.

The greater housing supply compared to Alternative 1 is expected to reduce upward pressure on market-rate housing costs and therefore also reduce pressures that cause economic displacement. Likewise, the greater supply of new affordable units is also expected to reduce the economic displacement of low-income households compared to Alternative 1.

While the Preferred Alternative is expected to reduce economic displacement pressures, there is some potential that it could increase cultural displacement pressures in some urban villages, as discussed previously. Within urban villages at highest risk of cultural displacement, the Preferred Alternative will yield less new housing growth than Alternative 2, and would be expected to have relatively lower cultural displacement impacts.

3.1.3 MITIGATION MEASURES

Under all alternatives, including Alternative 1 No Action, housing affordability and displacement would continue to be significant concerns.

INCORPORATED PLAN FEATURES

MHA requires the production of new affordable housing for households with incomes at or below 60 percent of AMI, mitigating to some extent the impacts of commercial and market-rate residential development in creating a need for affordable housing. By implementing MHA in the study area while increasing development capacity, the action alternatives both provide increased housing supply generally and additional affordable housing, neither of which would occur under Alternative 1 No Action. The differences in affordable housing production are detailed in 3.1.2 Impacts.

The Preferred Alternative moderates development capacity increases in urban villages with high displacement risk. These urban villages have high overlap with areas of the city that have relatively higher percentages of racial and ethnic minority populations. Moderating growth capacity in these areas mitigates the potential for cultural displacement of racial and ethnic minority populations.

ADDITIONAL STRATEGIES FOR PROVIDING AFFORDABLE HOUSING BEYOND THE PROPOSAL

Affirmatively Further Fair Housing

OH makes investment decisions for the use of housing funds, including potential MHA funds, based on several criteria. One of the criteria is affirmatively furthering fair housing. This strategy specifically addresses the needs of communities of color and other disadvantaged populations. In addition to increasing housing choice by strategically locating new affordable housing, Office of Housing will also work with private owners to ensure that affordable units are affirmatively marketed to those with higher barriers to accessing housing.

Affordable Housing Funding Programs

Apart from MHA, several additional sources fund preservation and creation of affordable housing in Seattle. The Federal low-income

housing tax credit (LIHTC) program is the primary source of funding for low-income housing development in Washington State. Locally, the City uses voter-approved Housing Levy funds and contributions from developers through the existing Incentive Zoning program. The City has funded more than 13,000 units since 1981 through its Rental Production and Preservation Program. In August 2016, Seattle voters approved a new Housing Levy that will raise \$290 million over seven years. Other programs funded by the current Seattle Housing Levy include:

- Acquisition and Preservation Program: Short-term funding to permit strategic acquisition of property for low-income housing preservation and development
- Operating and Maintenance Program: annual operating and maintenance subsidies for buildings housing extremely low income and formerly homeless residents
- Homeownership Program: low-interest deferred loans to first-time homebuyers and development subsidies for long-term resale restricted ownership housing
- Homelessness Prevention and Housing Stability Program: combination of housing stabilization support services and financial assistance to serve those who are homeless or at risk of homelessness

~~Regional Equitable Development Initiative (REDI) Fund~~

In response to the significant investments being made in transit, the public-private Regional Equitable Development Initiative (REDI) Fund was created to help finance the acquisition of property along transit corridors to preserve the affordability of future housing and community facilities. The City participates in the REDI Fund, which uses public funds to leverage private investment, making a total of \$21 million available across the region.

Multifamily Tax Exemption Program (MFTE)

In October 2015, the Seattle City Council passed Ordinance 118505 renewing and expanding the Multifamily Tax Exemption (MFTE) program. MFTE incentivizes builders to rent- and income-restrict 20 percent of housing units in new multifamily structures. In exchange for on-site

affordability, the City provides a partial property tax exemption for up to 12 years. This program is available in all multifamily areas throughout the city.

At least 20 percent of units in buildings containing the minimum number of dwelling units with two or more bedrooms, and 25 percent of units in buildings not containing the minimum number of two-bedroom units, must be affordable and rented to households up to following income levels:

- 40 percent of AMI for congregate residences or small efficiency dwelling units
- 65 percent of AMI for studio units
- 75 percent of AMI for one-bedroom units
- 85 percent of AMI to two-bedroom units
- 90 percent of AMI for three-bedroom and larger units

All ~~three~~ four alternatives in this proposal are expected to see growth in the number of affordable units incentivized through the MFTE program. Between 2011 and 2015, approximately 17 percent of all new units in multifamily buildings built in Seattle between 2011 and 2015 were rent-restricted through this program. It is expected that this program will continue to produce units in all ~~three~~ four alternatives.

Incentive Zoning

The City has a voluntary Incentive Zoning program that allows participating developers to achieve floor area beyond base density or height in their projects in selected zones and neighborhoods by either providing a modest number of affordable units onsite or by contributing to the City's housing development capital fund. Once MHA is implemented, incentive zoning affordable housing requirements will automatically be satisfied through compliance with MHA, where applicable. Non-housing Incentive Zoning benefits such as open space, childcare, and transfer of development rights remain unchanged with MHA.

The development capacity increases in the action alternatives evaluated above could be implemented with Incentive Zoning if implementation of MHA did not occur. Affordable housing constructed would be considerably less than the under the action alternatives.

Other Potential New Resources for Affordable Housing

The City, in partnership with other cities, nonprofit housing providers, unions, and advocates, could explore new financial tools to incentivize the preservation of existing rental homes if property owners set aside units in their buildings for low-income tenants.

There is precedent in other high-cost areas, like Silicon Valley, for cities to partner with major employers on affordable housing. The City could further develop partnerships with major local employers to encourage employer-based solutions to expand housing choices close to job centers.

If some combination of the strategies for potential new resources described above are further developed during the planning period, additional mitigation that helps meet affordable housing needs could be achieved.

New to the FEIS

Other Potential New Resources for Affordable Housing summarizes potential new resources under a single heading—this section replaces the following sections from the DEIS: *Property Tax Exemption with Goal of Preserving Apartment Buildings*, *Local Voluntary Employers Fund*, and *Real Estate Excise Tax for Affordable Housing*

ADDITIONAL ANTI-DISPLACEMENT MEASURES

Strengthened Tenant Protections

In August 2016, the City Council passed Ordinance 118755 banning discrimination against prospective tenants who use alternative forms of income to pay rent, such as social security, disability, child support, or unemployment. This expanded existing protections for tenants paying for housing with federal Section 8 vouchers.

Tenant Relocation Assistance

The Tenant Relocation Assistance Ordinance is designed to help partially mitigate the impacts of physical displacement by requiring developers to pay relocation assistance to tenants with incomes at or below 50 percent of AMI who must move because their rental will:

- Be torn down or undergo substantial renovation
- Have its use changed (for example, from apartment to a commercial use or a nursing home)
- Have certain use restrictions removed (for example a property is no longer required to rent only to low-income tenants under a federal program)

Strengthen Tenant Relocation Assistance Ordinance

Due to high housing costs, displaced lower-income tenants have difficulty finding replacement housing in Seattle. The TRAO program currently provides a payment of \$3,255 to renter households with incomes at earning 50 percent of AMI or less to help them secure new housing. The City could increase the effectiveness of the TRAO program by:

- Providing assistance to tenants with language barriers or those suffering from mental illness or cognitive disabilities.
- Revising the definition of “tenant household.” Under the existing definition, all low-income tenants on a lease are treated as members of one household and granted only one quota of relocation assistance, even if they are roommates who do not intend to seek housing together again.
- Seek authorization in State law to increase the eligibility level for TRAO payments from 50 percent of AMI to 80 percent of AMI.

Seattle Equitable Development Initiative

In 2016, the Office of Planning and Community Development created the Equitable Development Initiative (EDI), a set of strategies that emerged from the Growth and Equity Report, part of the Seattle 2035 Comprehensive Plan update. The EDI involves many different City departments coordinating to address equity in our underserved communities and displacement as Seattle grows. Various EDI strategies are intended to:

- Advance economic mobility and opportunity
- Prevent residential, commercial, and cultural displacement
- Build on local cultural assets
- Promote transportation mobility and connectivity
- Develop healthy and safe neighborhoods

Other Cultural Displacement Mitigation

Since the potential for cultural displacement of racial and ethnic minority populations is higher for action alternatives, additional mitigation measures may be required. Actions that support the retention of existing cultural businesses or institutions, and actions that would support the creation of new cultural businesses or institutions that support social cohesion in minority racial and ethnic communities may be effective mitigation. Several examples of potential actions, in addition to the Equitable Development Initiative, follow:

- New funding sources could be combined with affordable housing programs administered by Office of Housing to support ground-floor commercial space for culturally significant businesses or cultural institution tenants. In several zones, development regulations require active ground-floor uses such as commercial or institutional uses. New resources could enable OH to partner with non-profit affordable housing providers to include culturally significant businesses or institutions on the ground floor of OH supported housing developments.
- In May 2017, the City of Seattle's Office of Arts and Culture released the report "30 Ideas for the Creation, Activation, and Preservation of Cultural Space," or the CAP report. Implementing strategies in the CAP report could mitigate potential cultural displacement.
- The Office of Economic Development has various programs to support small businesses including racial and ethnic minority small businesses. These include the Only in Seattle grant program, and technical assistance to small business owners. Increased annual allocations for these programs could mitigate cultural displacement.
- New development regulations could be created that require or incentivize a portion of ground floor commercial space to include smaller-sized retail spaces. Smaller retail spaces are more likely to meet the needs of small businesses, including businesses serving racial and ethnic minority populations.

New to the FEIS

Other Cultural Displacement Mitigation is a new section since issuance of the DEIS

3.1.4 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Implementing MHA cannot meet the entire need for affordable housing. Seattle will continue to face housing affordability challenges. The Seattle 2035 Comprehensive Plan Final EIS found a significant unavoidable adverse impact in the area of housing, stating that Seattle would continue to face a housing affordability challenge under all alternatives studied. The HALA Advisory Committee set a goal of adding or preserving 50,000 housing units by 2025, including 20,000 rent or income-restricted housing units. Implementing MHA in the study area would contribute significantly to meeting this citywide goal by resulting in the generation of more than 5,500 rent- and income-restricted housing units from development in the study area over 20 years. 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 the 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.

MHA has been constructed so that the additional capacity provided through zoning changes can support the additional costs borne by developers for affordable housing. While the City's research and economic studies indicate that program costs are reasonable, developers may experience some financial impact. Whether such costs are absorbed by developers or passed along to users will depend on complex circumstances that vary with individual circumstances and cannot be estimated. These types of financial economic impacts are not elements of environmental review under SEPA.

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.

3.2



LAND USE.

This section focuses on land use patterns and the implications for land use compatibility that may occur if the City adopts the zoning changes described under each alternative.

3.2.1 AFFECTED ENVIRONMENT

This section addresses land use patterns and development compatibility citywide and in Seattle's urban villages. This review provides a baseline for analyzing the impacts of the alternatives for implementing MHA. Although this affected environment discussion covers the whole city, the impacts and mitigation analyses apply only to the study area. Exhibit 2–1 in Chapter 2 is a map of the study area.

The Seattle 2035 Comprehensive Plan EIS described land use conditions in Seattle. This chapter relies primarily on the background information contained in that document. While some changes to existing land use have likely occurred since publication of that EIS, overall land use patterns in Seattle have not changed significantly. The following sections describe future land use as envisioned in the Seattle 2035 Comprehensive Plan and generalized current land use patterns; for a detailed quantitative description of land uses in Seattle, please refer to the Comprehensive Plan EIS.

FUTURE LAND USE AND ZONING

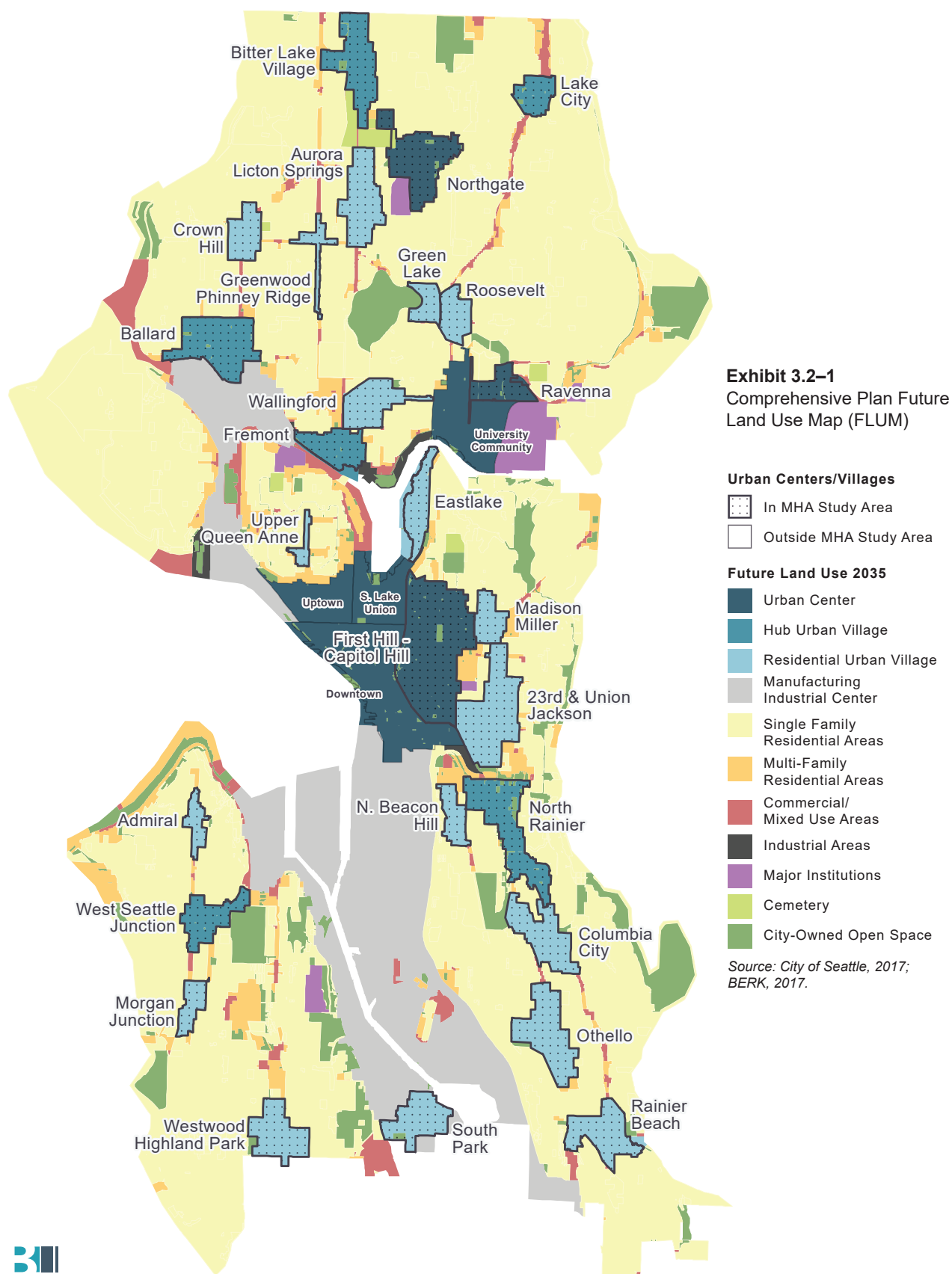
Seattle 2035 Comprehensive Plan Update

In 2016, the City completed a major update to its Comprehensive Plan, adopting a new 20-year plan to guide growth through the year 2035. Seattle 2035 renewed the City's commitment to the urban village strategy, originally established in 1994 as part of the City's first Comprehensive Plan under the state

Growth Management Act. Several goals and policies from the recently adopted Seattle 2035 Plan assist evaluation of the proposed action to implement MHA:

- Land Use Goal 1 from the Seattle 2035 Plan is to “Achieve a development pattern consistent with the urban village strategy, concentrating most new housing and employment in urban centers and villages, while also allowing some infill development compatible with the established context in areas outside centers and villages.” (LU G1)
- Urban Center, Hub Urban Village, and Residential Urban Village were established as Future Land Use designations on the Future Land Use Map (FLUM) (Exhibit 3.2–1). Prior to this, the FLUM indicated other use-specific designations (e.g., Single Family, Multifamily) in urban centers and urban villages.
- Seattle 2035 renewed the policy commitment for urban centers and urban villages to flourish as compact mixed-use neighborhoods designed to accommodate most of Seattle’s new jobs and housing. (GS 1.2)
- Land use policies for Urban Center and Urban Village designations were updated to promote a variety of housing types and affordable rent levels. (GS 1.13, LU G2)
- Seattle 2035 considered expansions of certain urban villages with very good transit service. The Plan includes new land use policies that support aligning urban village boundaries generally with a 10-minute walk of light rail and other very good transit. (GS 1.12)

As shown in Exhibit 3.2–1, the Comprehensive Plan’s Future Land Use Map (FLUM) identifies land use designations intended to guide growth and development across the city. The proposed Action Alternatives would modify the Future Land Use map to include more land in certain Hub and Residential Urban Villages within a 10-minute walk of light rail or very good transit service. (See Chapter 2). An overview of the intent for each FLUM designation is below.



Urban Centers

These densest neighborhoods in the city are both regional centers and neighborhoods that provide a diverse mix of uses, housing, and employment opportunities.

Urban Centers and Villages

Urban Centers

The Seattle 2035 FLUM has a single designation for all land in the six urban centers, indicating a wide variety of land uses are appropriate in urban centers. Urban centers are designated regionally by the King County Countywide Planning Policies and locally by the Seattle Comprehensive Plan. First Hill–Capitol Hill, Northgate, and the Ravenna portion of the University Community¹ are the only parts of the study area in urban centers.

Comprehensive Plan policies (GS 2.1) call for a variety of uses and the highest densities of both housing and employment in Seattle’s urban centers, consistent with their role in the regional growth strategy. The Comprehensive Plan states that in urban centers zoning should allow for a diverse mix of commercial and residential activities. (Growth Strategy Figure 2).

Urban Villages

Hub Urban Villages

The FLUM also has a single designation for all land in hub urban villages, indicating the wide variety of land uses appropriate in hub urban villages. Seattle’s six hub urban villages are in the study area. The Comprehensive Plan states that in hub urban villages zoning should allow a range of uses, including a variety of housing types and commercial and retail services that serve a local, citywide, or regional market, generally at a lower scale than in urban centers. In hub urban villages, the Comprehensive Plan’s growth accommodation criteria call for zoning that allows at least 15 dwelling units per gross acre.

Residential Urban Villages

Like urban centers and hub urban villages, the FLUM has a single designation for all land in residential urban villages. All 18 of the Seattle’s residential urban villages are in the study area. The Comprehensive Plan Zoning and Use guideline for residential urban villages calls for zoning that emphasizes residential uses while allowing for commercial and retail services for the urban village and surrounding area, generally at

Hub Urban Villages

Communities that provide a balance of housing and employment, generally at lower densities than urban centers. These areas provide a locus of goods, services, and employment to communities that are not close to urban centers.

Residential Urban Villages

Provide a locus of goods & services for residents & surrounding communities but may not provide a concentration of employment.

¹ The University Community Urban Center is often colloquially called the University District but in fact comprises the U District business area, the University of Washington campus, and residential and commercial areas north and east of the campus.

a lower scale than in hub urban villages. According to the Plan's growth accommodation criteria, zoning in residential urban villages should allow at least 12 dwelling units per gross acre.

Other Future Land Use Designations

The FLUM includes several other designations to indicate the planned pattern of future land use for areas outside urban centers and urban villages. Manufacturing and Industrial Centers are not included in the study area, and Parks and Open Space are addressed in Section 3.7 Open Space and Recreation of this EIS. The action proposes no changes to areas designated for Major Institution or Industrial land use. Minor changes to land with the following designations are a part of the proposed Action Alternatives in instances where urban villages are expanded.

Single Family Residential

The most extensive single FLUM designation is Single Family Residential, accounting for more than half of Seattle's total land area. The goal for single family areas (LU G7) is to provide opportunities for detached single-family and other compatible housing options that have low height, bulk, and scale in order to serve a broad array of households and incomes and to maintain an intensity of development appropriate for areas with limited access to services, infrastructure constraints, or fragile environmental conditions or that are otherwise not conducive to more intensive development. The only areas with this designation in the study area are those currently, or proposed as part of the action to be within urban villages.

Multifamily Residential

The land use goal (LU G8) for Multifamily Residential areas is to allow a variety of housing types and densities that is suitable for a broad array of households and income levels, and that promotes walking and transit use near employment concentrations, residential services, and amenities. The study area includes land with this designation where multifamily zoning exists outside urban villages.

Commercial / Mixed-Use

The land use goal (LU G9) for the Commercial / Mixed-Use designation is to create and maintain successful commercial/mixed-use areas that provide a focus for the surrounding neighborhood and that encourage new businesses, provide stability and expansion opportunities for

existing businesses, and promote neighborhood vitality, while also accommodating residential development in livable environments. The study area includes land with this designation where Commercial or Neighborhood Commercial zoning exists outside urban villages.

CURRENT LAND USE

City of Seattle

Seattle is about 83 square miles (53,182 acres) in area. The largest land use category, Single Family Residential, comprises about half of current land use in the city. Major institutions and public facilities and utilities account for about one tenth of Seattle's land use. Vacant land, parks and open space, commercial/mixed-use, and multifamily land uses each comprise another tenth of the city's land area (see Exhibit 3.2–2).

The highest concentrations of commercial and mixed-use development are found in Seattle's six designated urban centers, and particularly the four urban centers that constitute the "center city" (Downtown, First Hill-Capitol Hill, South Lake Union, and Uptown). Other urban villages and smaller nodes of development around the city also contain varying levels of commercial and mixed-use development.

Single-family residential neighborhoods fill the intervening areas, along with parks, open space, and major institutional uses. Industrial development predominates in the Greater Duwamish Manufacturing/Industrial Center (MIC) in south central Seattle and the Ballard-Interbay-Northend MIC, located northwest of Downtown. Exhibit 3.2–2 shows existing land use distribution across the city.

Urban Centers and Urban Villages

As discussed in Future Land Use above, the Growth Strategy Element of the Seattle 2035 Comprehensive Plan establishes an approach for accommodating Seattle's future growth by guiding new development to designated urban villages to, in part, maximize efficient use of infrastructure and services. The City distinguishes urban centers, hub urban villages, and residential urban villages, with varying functions and intended purposes. The following summary of existing land uses and zoning designations in urban villages provides a baseline for the analysis.

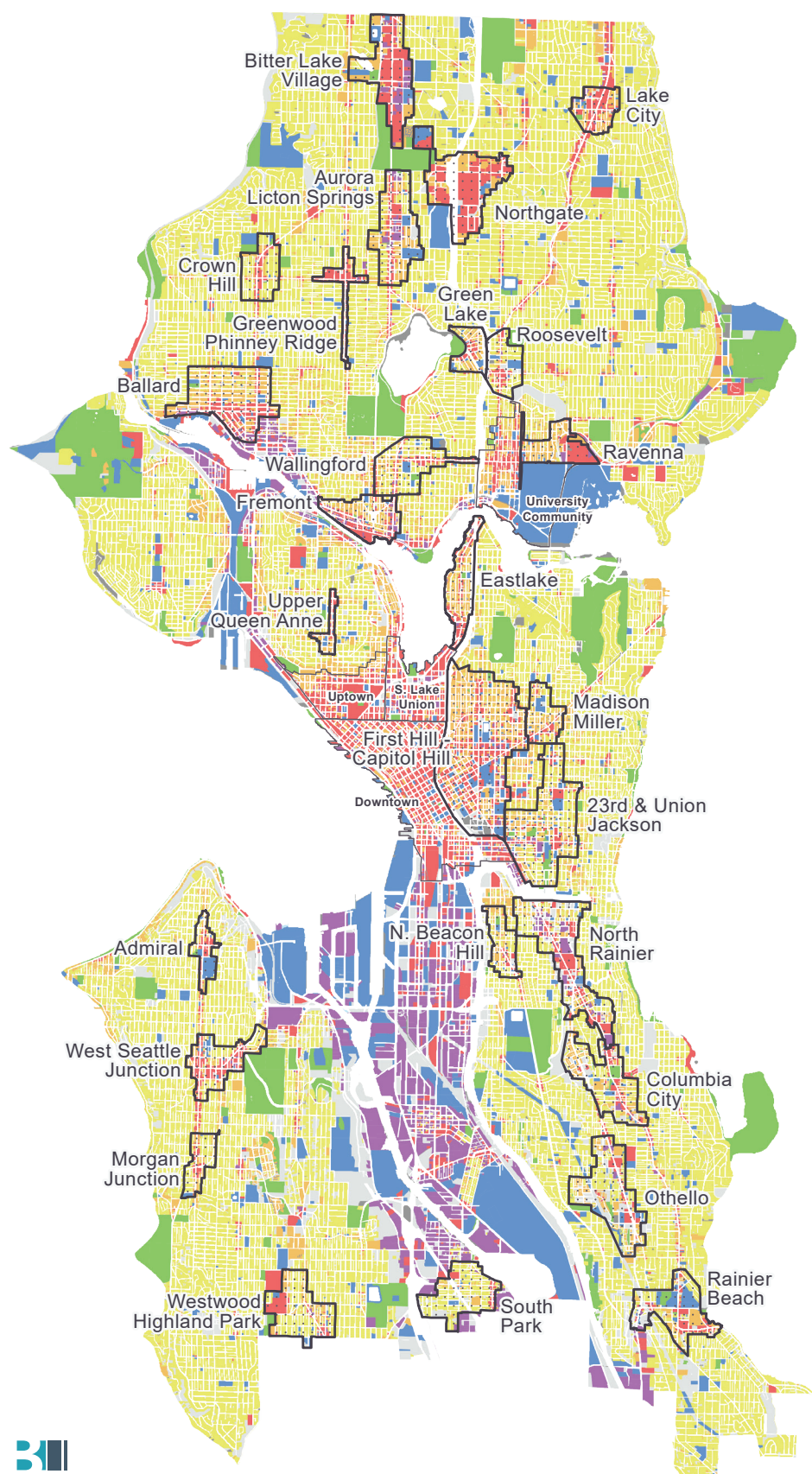


Exhibit 3.2-2
Existing Land Use Categories

Urban Centers/Villages

- In MHA Study Area
- Outside MHA Study Area

Existing Land Use

- Commercial/Mixed Use
- Industrial
- Single Family
- Major Institution and Public Facilities/Utilities
- Multi-Family
- Parks/Open Space/Cemeteries
- Reservoirs/Water Bodies
- Vacant
- Unknown

Source: City of Seattle, 2017;
BERK, 2017.

Urban Centers

Seattle's six designated **urban centers** are characterized by their focus on employment. Commercial and mixed-use development (which integrates residential and commercial uses) account for almost half of current land use in urban centers. In urban centers, single-use residential development is primarily multifamily, and single-family residential accounts for very little land. In general, almost half of an urban center's land is commercial/mixed-use, one-fifth single-use multifamily residential, one-fifth major institution or public facility, and a small amount industrial. But each of Seattle's urban centers has its own unique character and mix of uses. For example, both Downtown and First Hill-Capitol Hill share the density, development intensity, and mixed-use character that typify urban centers, but Downtown is more heavily commercial. By contrast, the University District contains a mix of commercial, residential, and industrial uses but is distinguished by the University of Washington campus and contains more public facility and institutional uses than other urban centers.

Overall, about 60 percent of zoning in urban centers allows commercial/mixed-use development and one-quarter allows multifamily residential. On average, open space, industrial, and single-family residential land use designations each comprise two percent or less of the land area in urban centers.

Urban Villages

Seattle's six **hub urban villages** account for about 1,232 acres of land in Seattle (3.2 percent). On average, about one-third of land use in hub urban villages is commercial/mixed-use (commercial integrated with residential uses), one-quarter single-use multifamily residential, about one-sixth single-family residential, and about one-quarter is a mix of other use categories (industrial, institutional, vacant land, open space). The specific land use mix varies in each hub urban village. Commercial/mixed-use land varies from more than 20 percent of land use in North Rainier to about 47 percent in Bitter Lake. Multifamily residential ranges from more than ten percent of land in North Rainier to around 40 percent of land in Ballard. Single-family residential use ranges from just 5 percent of land use in Bitter Lake and Lake City, to over one-quarter of land in North Rainier and West Seattle Junction.

In the six hub urban villages, the zoning composition averages half commercial/mixed-use zones and one-third multifamily residential zones. But there is considerable variation. For example, commercial/mixed-use zoning ranges from one-third of land area in Ballard to more than

two-thirds of land area in Bitter Lake. Conversely, multifamily zoning ranges from less one fifth of land area in Bitter Lake to more than half in Ballard. Ballard and Fremont contain no single-family residential zoning, while single family zoning occupies one-quarter of land area in the West Seattle Junction.

Seattle's 18 **residential urban villages** account for 2,631 acres of land (6.8 percent) in Seattle. Compared to hub urban villages, residential urban villages tend to have more land in single-family and multifamily residential use. Residential urban villages also exhibit a range of variation among their land use patterns. Commercial/mixed-use accounts for less than 10 percent of land use in South Park but accounts for more than 60 percent of land use in Greenwood-Phinney Ridge. Single family residential makes up more than 60 percent of land use in South Park but less than five percent of land use in Upper Queen Anne.

Zoning in residential urban villages tends to balance commercial/mixed use, multifamily residential, and single family residential development. Like hub urban villages, the particular zoning mix varies in residential urban villages. Commercial/mixed-use zoning ranges from about 10 percent of land area in South Park to 90 percent in Greenwood-Phinney Ridge. Multifamily residential zoning ranges from about 10 percent in South Park to more than 60 percent in Green Lake. Single-family residential zoning ranges from one percent in Greenwood-Phinney Ridge to more than 60 percent in Crown Hill.

RELEVANT POLICIES AND CODES

Comprehensive Plan Policies

The Land Use Element of the Seattle 2035 Comprehensive Plan sets goals and policies to implement the urban village strategy. Specifically, it includes policies governing changes in zoning for residential areas and infill development.

- **Policy LU 1.3** Provide for a wide range in the scale and density permitted for multifamily residential, commercial, and mixed-use projects to generally achieve the following overall density and scale characteristics, consistent, at a minimum, with the guidelines in Growth Strategy Figure 1:
 - » In urban centers, a moderate to high-density and scale of development
 - » In hub urban villages, a moderate density and scale of development

- » In residential urban villages, a low to moderate density and scale of development
- » Consider higher densities and scales of development in areas near light rail stations
- **Policy LU 1.4** Provide a gradual transition in building height and scale inside urban centers and urban villages where they border lower-scale residential areas.
- **Policy LU 2.7** Review future legislative rezones to determine if they pose a risk of increasing the displacement of residents, especially marginalized populations, and the businesses and institutions that serve them.
- **Policy LU 7.3** Consider allowing redevelopment or infill development of single-family areas inside urban centers and villages, where new development would maintain the low height and bulk that characterize the single-family area, while allowing a wider range of housing types such as detached accessory units, cottage developments or small duplexes or triplexes.
- **Policy LU 8.4** Establish evaluation criteria for rezoning land to multifamily designations that support the urban village strategy, create desirable multifamily residential neighborhoods, maintain compatible scale, respect views, enhance the streetscape and pedestrian environment, and achieve an efficient use of the land without major impact on the natural environment.
- **Policy LU 8.13** Use highrise multifamily zoning designations only in urban centers, where the mix of activities offers convenient access to regional transit and to a full range of residential services and amenities, as well as to jobs.

Land Use Code Provisions

MHA implementation would involve zoning map amendments in the study area and zoning code amendments to development regulations. The proposal includes rezoning of some areas currently zoned for single-family residential use. As a part of the action to implement single family rezones in urban villages, the proposal includes targeted amendments to the Land Use Code rezone criteria for single-family parcels (Section 23.34.010 of the SMC). Appendix F contains a summary of these proposed text amendments.

3.2.2 IMPACTS

The following land use impact analysis evaluates each of the alternatives with respect to land use patterns, compatibility, and compliance with adopted land use plans, policies, and regulations.

IMPACTS COMMON TO ALL ALTERNATIVES

Under all alternatives, Seattle would likely experience housing and employment growth over the long term, consistent with the estimates identified in Chapter 2. Increases in households and jobs may result from expected growth as anticipated in the Comprehensive Plan and/or additional incremental growth from zoning changes to implement MHA. As described in Chapter 2, each alternative would distribute future residential and commercial development capacity to different areas of the city according to existing or proposed land use regulations. Under all alternatives, most future growth would occur in urban centers and urban villages. Because Alternative 1 No Action would not implement MHA or modify existing land use regulations, the following discussion pertains only 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-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 in particular locations.
- Significant land use impacts would usually 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.
- Denser and more intensive growth would occur in existing multifamily and commercial zones outside urban villages. In some locations,

depending on the alternative, these changes would have fewer land use impacts since increases in maximum height limits would be small, resulting in only minor impacts. In other areas, the changes could be moderate or significant, depending on the location and specific change in zoning proposed by the alternative.

- More affordable housing units would be built.
- A greater variety of housing types would occur in the city'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 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 MHA tier increases, but there is variation in the impacts depending on the specific zoning change and location. (See Chapter 2 and Section 3.3 Aesthetics for description of MHA tiers.)

The alternatives primarily differ in the distribution of zone changes and the resulting incremental intensification of new development that could lead to land use impacts. To establish a framework to further distinguish potential land use impacts, we can consider three types of land use impact:

- **Intensification of use:** Land use impacts may occur when zoning changes would allow different activities and functions to take place. For example, this could occur in an area with residential zoning that is rezoned to allow commercial activities such as retail or offices. Changing the uses allowed in an area can have a land use impact since certain new activities can conflict with established functions. Impacts related to intensification of use can include noise, increased pedestrian and vehicle traffic, parking constraints, longer hours of activity, industrial and other urban noises, air quality, and increased light and glare from buildings. Greater impacts from construction including noise could be associated with intensification of land use, if construction of different types of buildings not previously allowed in the area would increase duration of construction activity. Intensification of use could also have impacts associated with a loss of tree canopy or other vegetation. This analysis considers the following broad land use categories that pertain to the study area: Single Family, Multifamily, and Commercial/Mixed-Use. Alternatives 2 and 3 and the Preferred Alternative change the distribution of land use among these categories, which may create an impact in certain circumstances.
- **Density increase:** Land use impacts may occur from an increase in the allowed density of activity allowed on a site. This analysis focuses on residential density, since the primary purpose of the proposal

is to provide more affordable housing. Rezoning to commercial or mixed-use zones could result in greater commercial density in some locations. Residential density increases occur when density limits in the Land Use Code are changed or removed such that a property of a given size could have more housing units. In the proposal, land use code density limit reduction or removal pertains primarily to areas with Single Family Residential and Lowrise multifamily zoning, since Midrise, Highrise, and Commercial zones do not have codified density limits. However, in addition to removal or reduction of land use code density limits, increased density can also result from increases to allowed building height or floor area, since the same site would be allowed to contain more housing or commercial space. Impacts related to density increases can include noise, increased pedestrian and vehicle traffic, and parking constraints.

- **Scale change:** Land use impacts may occur from increasing the scale of buildings that can be built in an area. Zoning changes that increase maximum height or floor area ratio (FAR) limits or modify required setbacks could result in scale changes that create land use impacts. Small or incremental changes in building scale may not be a significant adverse land use impact per se, depending on context and degree. For example, an increase in the height of midrise buildings from four to five stories, with the same uses, general configurations, and building footprint, would not typically require an adverse land use impact finding, although aesthetic impacts could be possible. Such a building would likely be able to fit similarly into the land use pattern with or without the change. (Section 3.3 Aesthetics evaluates potential aesthetic impacts of small-scale changes.)

However, large-scale changes that alter building form in a more fundamental manner could create land use impacts. For example, introducing a 240-foot-tall residential tower in an area of two- to three-story lowrise multifamily structures could have a land use impact, as the tower would occupy the land in a completely different configuration than the lowrise structures. Scale impacts could include view blockage, decreased access to light and air at ground level, and reductions in privacy, and increases in light and glare. Greater impacts from construction including noise could also be associated with scale change, if construction of larger buildings than previously permitted would increase duration of construction activity. Construction of taller or bulkier structures could also impact existing solar panels on neighboring structures. Allowance for taller buildings, particularly to the south of existing solar panels could reduce the utility of neighboring solar panels by shading them for longer periods of the day.

This analysis considers four broad scale categories and identifies potential land use impacts when zoning is changed between categories.

- » **Single Family:** all Single Family Residential zones and Residential Small Lot for this purpose
- » **Lowrise:** including all LR zones
- » **Midrise:** MR zones and C, NC, and SM zones with height limits up to 75 feet
- » **Highrise:** HR zones and C, NC, and SM zones with height limits greater than 75 feet

Where more than one type of land use impact is present due to a proposed change, the land use impact would be more severe than if only one of the above impacts are present. As described in Chapter 2 and Section 3.3 Aesthetics, the MHA (M), (M1), and (M2) rezone suffixes are one way to approximate the magnitude of an MHA zone change. Distribution of these suffixes is summarized later in this Chapter, and in detail in the Aesthetics chapter, but as discussed above not every zoning change within an (M), (M1), or (M2) tier would have the same land use impacts. Therefore, a more nuanced metric is needed to identify land use impacts. The tables below identify the individual zoning changes within MHA tiers and their potential land use impact. Quantification of the specific amount of land affected by each zoning change can be found in Chapter 2 and Appendix H.

Exhibit 3.2–3 shows that most (M) tier zoning changes would have one type of land use impact, in the form of a density increase. The degree of land use impacts from the (M) tier zoning changes as minor, moderate or significant is described below in the Impacts Thresholds subsection.

As seen in Exhibit 3.2–4 most, but not all, of the (M1) tier zoning changes would have more than one type of land use impact. The most severe land use impacts would be in areas currently zoned single family that are rezoned to LR2, in which case there is potential for density, use and scale impacts. Changes from certain Lowrise zones to Neighborhood Commercial zones also have greater potential impacts, since density, use, and scale impacts would result. Changes from the Lowrise 1 zone to other Lowrise zones could result in minor or moderate density impacts. The degree of land use impacts from (M1) tier zoning changes as minor, moderate or significant is described below in the Impacts Thresholds subsection.

All (M2) tier zoning changes would have two or more types of land use impacts (Exhibit 3.2–5). Areas currently zoned single family, and lowrise areas that would be rezoned to NC would have the most severe impacts, as density, use, and scale impacts could occur.

Exhibit 3.2–3 Land Use Impacts by Zone Change, (M) Tier Zoning Increases

Zone Change	Type of Land Use Impact
Single Family → Residential Small Lot (RSL)	<ul style="list-style-type: none"> • Density: Proposal would allow an increase in density of households. • Use: No change in allowed use from residential. • Scale: Despite smaller front and rear yard setbacks, RSL retains the same height limit and introduces an FAR limit. RSL buildings would not alter the land use pattern and do not present a scale impact.
Lowrise 1 → Lowrise 1 (M) Lowrise 1 → Lowrise 2 (M)	<ul style="list-style-type: none"> • Density: The current density limit in the LR1 zone would be removed, allowing greater residential density, but height limits would remain the same or similar. • Use: No change in allowed use from residential. • Scale: None
Lowrise 2 → Lowrise 2 (M) Lowrise 3 → Lowrise 3 (M)	<ul style="list-style-type: none"> • Density: While these zones would have no maximum density limits*, development standard changes will increase likelihood that projects achieve higher densities. However, height limits and FAR requirements would be similar to existing regulations. • Use: No change in allowed uses. • Scale: None
Midrise → Midrise (M) Highrise → Highrise (M)	<ul style="list-style-type: none"> • Density: No maximum density limits, but height limits would increase slightly <u>in MR, and substantially in HR under the preferred alternative.</u> • Use: No change in allowed use from residential. • Scale: None
NC30 → NC-40 (M) NC-30 → NC-55 (M) NC-40 → NC-55 (M) NC-65 → NC-75 (M) SM-65 → SM-75 (M) IC-45 → IC-65 (M)	<ul style="list-style-type: none"> • Density: While these zones would have no maximum density limits, development standard changes will increase likelihood that projects achieve higher densities. However, height limits and FAR requirements would be similar to existing regulations. • Use: None • Scale: None
NC-85 → NC-95 (M) NC-125 → NC-145 (M) NC-160 → NC-200 SM-D 40-85 → SM-D 95 (M)	<ul style="list-style-type: none"> • Density: While these zones would have no maximum density limits, development standard changes will increase likelihood that projects achieve higher densities. However, height limits and FAR requirements would be similar to existing regulations. • Use: None • Scale: Larger height limit increases at the higher end of the NC zones (above NC-125) could be great enough to create a scale changes impact, depending on location and surrounding conditions. A detailed analysis of height and scale impacts is presented in Section 3.3 Aesthetics.

* Comparison is between the most intensive allowed housing type in the LR zone, apartments, for which there is no density limit under existing and proposed LR2 and LR3 zoning.

Source: City of Seattle, 2017; BERK, 2017.

In general, the potential for land use impacts and the severity of land use impacts tends to increase as the MHA tier increases, but the degree of impact varies depending on the specific zoning change, as well as on the surrounding zoning and uses. The degree of land use impacts of different zoning changes as minor, moderate or significant is described below in the Impacts Thresholds subsection. The distribution of land use impacts is discussed in the impacts of the Action Alternatives below.

Exhibit 3.2–4 Land Use Impacts by Zone Change, (M1) Tier Zoning Increases

Zone Change	Type of Land Use Impact
Single Family → LR1 (M1) Single Family → LR2 (M1)	<ul style="list-style-type: none"> • Density: Allows an increase in density of households. • Use: Potential to change land use from single family to multifamily. • Scale: Potential to change scale from single family to lowrise, though height limits would be the same, or similar.
Lowrise 1 → Lowrise 3 (M1)	<ul style="list-style-type: none"> • Density: The current density limit in the LR1 zone would be removed resulting in potential for greater residential density through increases to height and FAR. However, height limits and FAR requirements would be similar to existing regulations. • Use: None • Scale: None
Lowrise 2 → Lowrise 3 (M1)	<ul style="list-style-type: none"> • Density: No maximum density limits, but height limits would increase slightly. • Use: No change in allowed use from residential. • Scale: None
Lowrise 2 → NC-40 (M1) Lowrise 2 → NC-55 (M1)	<ul style="list-style-type: none"> • Density: Height increase combined with greater allowed lot coverage would result in moderate to significant increase in density. • Use: Change allowed land use to allow commercial. • Scale: Change in scale from lowrise to midrise. Potential that neighborhood commercial buildings could be arranged to occupy site in a more intensive manner.
Lowrise 3 → Midrise (M1)	<ul style="list-style-type: none"> • Density: Moderate increase in height limit and FAR would result in increased density. • Use: None • Scale: Change of scale from lowrise to midrise.
Lowrise 3 → NC-75 (M1)	<ul style="list-style-type: none"> • Density: Moderate increase in height limit and FAR would result in increased density. • Use: Change to allow commercial land use. • Scale: Change of scale from lowrise to midrise.
C/NC-40 → NC-75 (M1) NC-40 → SM-85 (M1)	<ul style="list-style-type: none"> • Density: No maximum density limits, but height limits would increase more than 30 feet, resulting in density impacts. • Use: No change in allowed use from commercial. • Scale: Both allow midrise buildings, none.
NC-65 → NC-145 (M1) NC-85 → NC-145 (M1) NC-40 → SM-95 (M1) NC-40 → SM-125 (M1)	<ul style="list-style-type: none"> • Density: Increased density resulting from increased FAR in new zones and substantial height increases (50 feet or more), which could result in density impacts, depending on location and surrounding conditions. • Use: None • Scale: Change of scale from midrise to highrise.
NC-125 → SM-240 (M1)	<ul style="list-style-type: none"> • Density: Increased density resulting from increased height limit and FAR in new zone. • Use: None • Scale: While both height limits are highrises, the magnitude of the height increase constitutes a change in scale.

Source: City of Seattle, 2017; BERK, 2017.

Exhibit 3.2–5 Land Use Impacts by Zone Change, (M2) Tier Zoning Increases

Zone Change	Type of Land Use Impact
Single Family → LR3 (M2) Single Family → NC-40 (M2) Single Family → NC-55 (M2) Single Family → NC-75 (M2) Single Family → SM-75 (M2) Single Family → SM-95 (M2)	<ul style="list-style-type: none"> • Density: Allows an increase in density of households. • Use: Change land use from single family to multifamily and commercial. • Scale: Potential to change scale from single family to lowrise, midrise, and highrise.
Lowrise 1 → Midrise (M2)	<ul style="list-style-type: none"> • Density: Allows an increase in density of households. • Use: None • Scale: Change scale from lowrise to midrise.
Lowrise 2 → Midrise (M2)	<ul style="list-style-type: none"> • Density: Increase in density resulting from increased FAR. • Use: None • Scale change: Change scale from lowrise to midrise.
Lowrise 2 → NC-75 (M2)	<ul style="list-style-type: none"> • Density: Increase in density resulting from increased FAR.
Lowrise 2 → NC-95 (M2)	<ul style="list-style-type: none"> • Use: Change allowed land use to allow commercial. • Scale: Change in scale from lowrise to midrise.

Source: City of Seattle, 2017; BERK, 2017.

IMPACTS THRESHOLDS

As discussed in greater detail in the previous section, land use impacts due to changes in zoning can be a variety of different types. In addition, depending on existing conditions at a specific location, the land use impact due to any particular zoning change may have greater or lesser impact. In general, the impact analysis categorizes the degree of impacts to land use patterns and compatibility as follows:

- **Minor Impact:** Rezones or proposed changes to zoning regulations would result in a similar level of intensity as allowed under existing zoning, and the list of permitted land uses would be similar to current zoning. (M) tier rezones, as described above and in Chapter 2, would be in this category in nearly all cases. However, some moderate impacts could occur in certain (M) tier rezone areas, in specific locations, depending on proposed height limit increases, the existing land use pattern, presence or absence of transition to lower scale areas, and existing conditions in specific locations.
- **Moderate Impact:** Rezones or proposed changes to zoning regulations would result in an increase in development intensity (height, density, or FAR), but permitted land uses would remain similar to those allowed under current zoning. Most (M1) tier rezones would be in this category, along with some (M) tier rezones as noted above. Depending on the zones proposed and on the proposed height limit increases, along with the existing land use pattern, and existing

conditions in specific locations, some (M1) tier rezones may result in significant impacts as discussed below.

- **Significant Impact:** Rezones or proposed changes to zoning regulations would result in a substantial increase in development intensity (allowed density or building height), and the proposed zoning would permit new land uses not allowed under current zoning (e.g., rezoning a single-family residential area to allow commercial uses). This category would include all (M2) tier rezones and any (M1) tier rezones that fit the description above.

The location specific factors that could lead to a greater degree of land use impact in a particular zone change could include:

- Proximity of a low-intensity use, such as Residential Small Lot, to a more intensive use, such as industry or high-intensity commercial (e.g., along a zone or urban village boundary);
- Lack of height or scale transition between zones allowing similar uses, but substantially different heights or scales;
- Proximity of a high-intensity use or zone to a public open space, such as a park.
- Introduction of higher-intensity uses or building forms into an area of consistent, established architectural character and urban form, such as a historic district.

The locations of (M), (M1), and (M2) tier rezones by alternative are shown in Exhibit 3.3–23, ~~and~~ Exhibit 3.3–25, and Exhibit 3.3–27 in Section 3.3 Aesthetics.

Impacts in Single Family Zoned Areas

As noted in the tables above, regardless of MHA tier, the greatest potential for significant adverse land use impact occurs in Single Family areas rezoned to higher intensities. These zoning changes would occur where single family zoning is present in existing or expanded urban villages. Urban villages with greater quantities of existing single family zones could experience more local land use impacts than urban villages with little single family zoning.

Impacts in Urban Village Boundary Expansion Areas

Most land in urban village expansion areas is currently zoned Single Family, and areas outside of existing villages have not been designated on the FLUM to receive focused housing and employment prior to this proposal. Therefore, areas with larger urban village boundary expansions will have greater potential for land use impacts. Land use impacts of urban village boundary expansions are also evaluated in the Seattle 2035 Comprehensive Plan EIS. Specific discussion of urban village boundary expansion areas is included below under discussion of Impacts of individual Alternatives as well as in Chapter 2 of this EIS.

Other Potential Land Use Issues

The following other issues contribute to potential land use impacts and are common to all alternatives:

- **Edges.** Where potential land use impacts are identified, the potential impact is not necessarily limited to the land within the rezone area. There is potential for conflicts and changes in character at the zone edge transition as well. Land use impacts in use, scale, or density changes could occur in transitions to single family locations outside the zone change. However, Comprehensive Plan 2035 Land Use Policy 1.4 provides for a range in scale and density permitted in multifamily, commercial, and mixed use projects in order to achieve moderate to high density and scale in urban centers, moderate density and scale in urban villages, and low to moderate density and scale in urban villages. In locations where land rezoned from greater intensity abuts or transitions to lower-intensity areas and uses, some spillover or proximity impacts may occur, including noise, increased pedestrian and vehicle traffic, competition for on-street parking, and changes to building form. Compatibility issues and minor conflicts such as these are common in any growing city, however. Depending on the alternative, the level of impact will vary from location to location.
- **Pressure for Further Zone Changes.** Zoning changes can create pressure for further rezoning of areas in proximity, although this would be controlled by Comprehensive Plan policy and zoning standards.
- **Changes from Commercial (C) to Neighborhood Commercial (NC).** Alternatives 2 and 3 include changes in zoning designation in urban villages from Commercial to Neighborhood Commercial zones. Since this change would not introduce a greater range of commercial uses, these changes are not considered to have adverse

land use impacts. The primary difference concerns building design and limitations on certain auto-oriented activities. Changing from C to NC does not affect scale or density, as long as the height designation is the same, but it may result in the creation of non-conforming uses and structures that would put limitations on the changes owners could make to their properties.

- **Incremental Development.** Development is expected to occur over time, and is not anticipated to occupy all sites, or even a majority of sites within a given neighborhood or area during the 20-year horizon addressed in this EIS. This chapter discusses impacts related to changes in zoning, but zone changes alone do not cause development. The incremental pattern of infill development would moderate the impact on land use.
- **Rate and Pattern of Growth.** The City anticipates that housing growth will occur relatively evenly over the course of the 20-year planning horizon and estimates where growth will occur. However, the locations and rates of growth could vary among individual urban villages in unanticipated ways. If a faster or concentrated pattern of growth unfolds in a specific area, greater land use impacts could occur.
- **Topography.** Steep topography can magnify land use change effects, particularly those related to scale. For example, a taller structure at the top of the hill can appear more prominent when viewed from lower on the hill. Taller structures on the downhill side of a slope can have greater potential to block views from locations further up the slope.
- **Block Pattern and Access.** Platted block patterns and access routes can influence land use impacts. For example, sites with alley access or where access is available from a side street may moderate use and density impacts by facilitating a wider variety of access routes to a site.

IMPACTS OF ALTERNATIVE 1 NO ACTION

Alternative 1 No Action is based on the growth strategy of the Seattle 2035 Comprehensive Plan and assumes that MHA would not be implemented in the study area. No area-wide zoning changes or affordable housing requirements would take place.

Most growth would occur in an intensive, urban mixed-use land use pattern within existing urban village boundaries. No urban village boundary expansions would occur. In particular, under current growth strategy policies, growth would be guided to those urban villages with light rail stations and very good transit service. Urban centers would continue to see primarily midrise and highrise development, while growth in urban villages would be a mix of lowrise and midrise development.

In the study area, land use patterns outside urban villages would not change significantly, and any change would be consistent with the Comprehensive Plan policies.

IMPACTS OF ALTERNATIVE 2

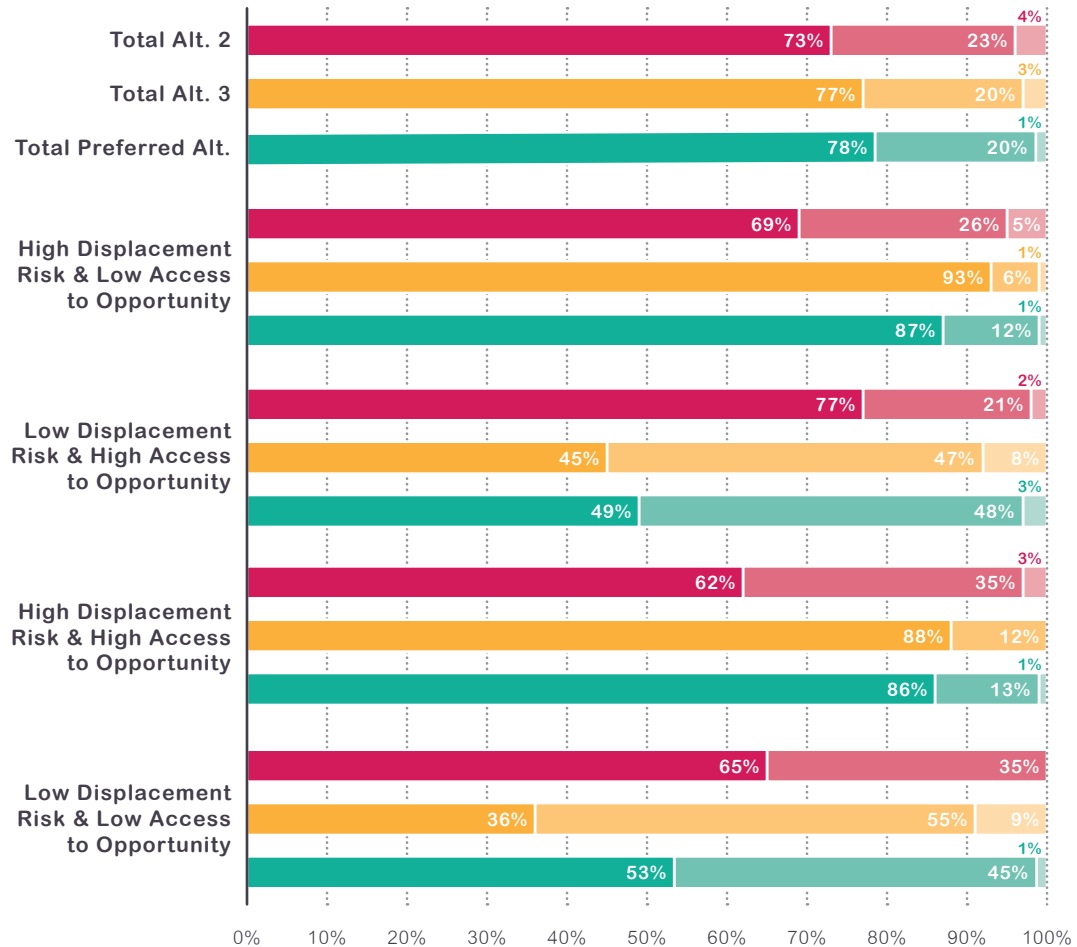
Alternative 2 would rezone areas in urban villages and other multifamily and commercial areas to implement MHA. Increases in development capacity would generally be proportional to each area's Seattle 2035 20-year growth estimates and would result in more intense land use in affected areas and some changes in building height, bulk, and form. Alternative 2 is based on the growth strategy outlined in the Seattle 2035 Comprehensive Plan, which concentrates land use changes in these same areas. However, the boundaries of some urban villages would expand and would incorporate and rezone some areas currently zoned single-family residential to allow smaller lots and multifamily housing. Compared to No Action, this would result in more pronounced land use changes in the form of changes to use, density, and building scale. These expansion areas are targeted in areas within a 5 to 10 minute walkshed of frequent transit stations. More information on, and maps of, the locations of these expansion areas can be found in Chapter 2 of this EIS and in the Seattle 2035 Comprehensive Plan 2035 EIS.

As noted in Chapter 2, the proposed (M1) and (M2) capacity increases are targeted and limited. Exhibit 3.2–6 shows the distribution of (M), (M1), and (M2) zoning changes for the study area overall and by neighborhood displacement risk and access to opportunity category.

Exhibit 3.2–6

Location of MHA Tiers in Alternative 2 and 3

Source: City of Seattle, 2017; BERK, 2017.



New to the FEIS

Alternative 2: M M1 M2 Preferred Alternative M M1 M2
Alternative 3: M M1 M2

FEIS Exhibit 3.2–6 now includes the Preferred Alternative since issuance of the DEIS

For Alternative 2 as a whole, 73 percent of the zoning changes are in the (M) tier, 23 percent are (M1), and 4 percent are (M2).

Overall, the land use pattern would be similar to Alternative 1, with some urban village boundary modifications and an incremental increase in the intensity and density of development in certain areas. Land use change would be greatest in rezoned single-family residential areas. Less change would occur in areas currently characterized by denser mixed-use development that receive an incremental increase in capacity.

Impacts to Urban Villages and Expansion Areas

The City's Growth and Equity Analysis includes an equitable development typology that categorizes urban villages according to displacement risk and access to opportunity. As described in Chapter 2, Alternative 2 would not explicitly consider risk of displacement or access to opportunity when distributing capacity increases to various urban villages. The analysis below describes the impacts on individual villages (and their expansion areas, where applicable), grouped by the equitable development typologies. Urban villages with frequent transit stations studied for expansion in the Seattle 2035 Comprehensive Plan would receive an urban village expansion reflective of a 10-minute walkshed from the frequent transit stations, as described in Chapter 2.

Refer to Chapter 2 and Appendix H for maps of specific proposed zoning changes in each urban village and the study area. Refer to the Comprehensive Plan Environmental Impact Statement for additional information about land use patterns in Urban Village expansion areas.

Urban Villages with High Displacement Risk and Low Access to Opportunity

For some areas with high displacement risk and low access to opportunity, density and height increases would lead to land use impacts as existing buildings are replaced with larger developments. Compared to Alternative 3, urban villages in this group would have a higher percentage of lands in the (M1) and (M2) Tiers where land use impacts are more likely (31 percent compared to 11 percent).

Specific high displacement risk/low access to opportunity areas with potential for land use impacts in Alternative 2 are described below. While not every potential land use impact is described in detail, the descriptions focus on significant impact, or the greatest potential for significant or moderate impact.

Rainier Beach. Areas in close proximity to the Rainier Beach light rail station would experience a variety of land use impacts, including significant impacts. Directly adjacent to the station, height limits would increase more than 45 feet, changing potential scale of development, and changing use to allow commercial. Existing Single family areas to the north and west of the station would be changed to multifamily zones with potential for density, scale and use impacts. Under Alternative 2, these impacts would also apply to 70 acres of expansion area, which is greater

than the 16 acres of expansion in Alternative 3. A new transition condition of Lowrise multifamily zoning at the edge of the urban village near Single Family zoned areas outside the urban village, would be created.

Othello. Existing single-family areas near the Othello light rail station would be changed to Lowrise multifamily presenting potential for density, use, and scale impacts, creating moderate impacts and significant impacts in some blocks being rezoned to Lowrise 3. Some commercially zoned lands along MLK Jr. Way S. would also have potential for scale increase impacts. Othello would potentially experience impacts across a greater geography as the expansion area would include 193 acres. Currently, this expansion area is predominantly single family and would likely see increases in density without creating an impact on scale. A new transition condition would be created for Residential Small Lot at the edges of the urban villages adjacent to Single Family zoned areas outside the urban village, with a few blocks of Lowrise zoning adjacent to single family including along 44th Ave. S, and S. Eddy St.

Westwood-Highland Park. Existing single family zones in several transitional areas at blocks behind existing commercial zones would be rezoned to multifamily, creating potential for use, scale, and density impacts, that would create moderate, and some significant land use impact. This would occur along streets including 20th, 25th and 26th Ave. SW, and in the blocks in the center of the urban village between SW Cloverdale St. and SW Barton St. The site of the Westwood Village shopping center would be of a different scale if redeveloped under proposed regulations.

South Park. Moderate land use impacts could result in areas rezoned from Single Family to Lowrise, to the north and south of existing multifamily areas flanking S. Cloverdale St. Blocks along S. Sullivan St., S. Thistle St., and S. Donovan St., would experience impacts associated with a change from single family to Lowrise. The majority of the village would see no major impacts to scale however, with the potential for no more than 15 feet of height increases along the S Cloverdale St. arterial roadway.

Bitter Lake. Several blocks with existing multifamily housing and low-scale commercial uses along Linden Ave N., could be changed to a greater scale resulting in moderate land use impacts. A few blocks of single family zoning at the edges of the north portion of the village along Stone Ave. N. and Fremont Ave. N. would be changed to Lowrise multifamily creating moderate land use impact. These changes to Lowrise would also decrease the amount of transition to Single Family zoned areas at the edge of urban village.

Impacts in these urban villages under Alternative 2 would include greater density and building heights and changes to physical form as uses and building types change. Urban villages in this group would have moderate and some significant land use impacts in Alternative 2.

Urban Villages with Low Displacement Risk and High Access to Opportunity

Additional growth in urban villages with low displacement risk and high access to opportunity would lead to density and height increases as existing buildings are replaced with larger developments. Compared to Alternative 3, urban villages in this group would have a much lower percentage of lands in the (M1) and (M2) Tiers, where severe land use impacts are more likely (23 percent compared to 55 percent).

Specific areas with potential for land use impacts in Alternative 2 are summarized below. While not every potential land use impact is described in detail, the descriptions focus on significant impacts, or the greatest potential for significant or moderate impact.

Roosevelt. Several blocks of existing single family zoning in transition areas at the edges of existing neighborhood commercial corridors would be changed to lowrise multifamily, resulting in moderate land use impact. A 4 acre expansion area between 14th and 15th Ave. NE within one block of NE 65th St. would experience minor land use impacts. The impacts would be similar to those in existing single family zoned areas inside the current urban village boundaries, that would be rezoned from Single Family to Residential Small Lot.

Wallingford. Blocks of existing single family zoning in transition areas at the edges of neighborhood commercial corridors would be changed to lowrise multifamily resulting in some moderate land use impacts. Impacted locations include the south frontage of N. 47th St., the west frontage of Meridian Ave. N., the east frontage of Midvale Ave. N., and the west frontage of Interlake Ave. N. Much of the residential portion of the village would have no changes to scale, and height increases would be no more than 15 feet along Stoneway Ave. N. and N 45th St.

Ballard. In the urban village boundary expansion at the east edge of the village, existing single family zoned areas would change to Neighborhood Commercial and multifamily along NW Market St. and adjacent blocks, creating potential for use, and density impacts, resulting in moderate impacts. The expansion area of 35 acres would see a predominantly single family residential area remain in residential use

in the Residential Small Lot zone, allowing an increase to density. The Residential Small Lot zone would provide a transition to Single Family Zoned areas outside of the urban village.

Madison–Miller. A few blocks of existing single family zoning near the community center along 19th Ave. E. south of Harrison St., and along 22nd Ave. E between E. John St. and E. Thomas St. would be changed to multifamily resulting in moderate impact. The city's only existing area of RSL zoning would be changed to a Lowrise multifamily zone. Impacts on scale of up to 15 feet could occur in much of the village in existing neighborhood commercial and multifamily zones.

Admiral. Approximately one block to the northwest of the 45th Ave. SW and SW Lander St. intersection, with existing single family zoning that is in a transition nearby existing neighborhood commercial and lowrise zoning, would be changed to lowrise multifamily resulting in moderate land use impact. Other potential impacts include additional density in residential areas and height increases of up to 15 feet in northern parts of the village.

West Seattle Junction. Areas of existing single family zoning at the edges of existing commercial and multifamily zones would be changed to lowrise multifamily, resulting in moderate land use impact. Much of the village would potentially experience minor or moderate impacts to scale with height increases of up to 15 feet. A 24-acre expansion area would see single family residential areas increase in density without a change in the residential use. One portion of the urban village expansion at the southeast of the village would be rezoned to Lowrise, however this area is almost completely bounded by an existing senior housing complex and lowrise and neighborhood commercial zoned lands, which mitigate potential transitions conflicts.

Crown Hill. Areas of existing single family zoning at the edges of existing commercial and multifamily zones along the 15th Ave. NW and NW 85th St. roadway corridors, would be changed to lowrise multifamily, creating moderate land use impact. Crown Hill would have an 80-acre urban village boundary expansion under Alternative 2 that would result in increases to density in areas to the west, south, and east of the current village boundaries. All of the urban village boundary expansion would be rezoned to RSL, except existing areas of multi-family or commercially zoned lands, resulting in minor land use impact.

Overall, Alternative 2 falls between No Action and Alternative 3 in terms of land use impacts in this category of urban villages. Most land use impacts are minor, with some moderate land use impacts.

Urban Villages with High Displacement Risk and High Access to Opportunity

Additional growth in urban villages with high displacement risk and high access to opportunity would lead to density and height increases as existing buildings would be replaced with larger developments. The land use pattern would become more urban and include more multifamily and mixed-use development. Compared to Alternative 3, urban villages in this group would have a higher percentage of lands in the (M1) and (M2) Tiers, where land use impacts are more likely (38 percent compared to 12 percent).

Specific areas with potential for land use impacts in Alternative 2 are described below. While not every potential land use impact is described in detail, the descriptions focus on significant impacts, or the greatest potential for significant or moderate impact.

Columbia City. Areas of existing single family zoning at the edges of existing commercial and multifamily zones would be changed to lowrise multifamily, primarily in locations between Rainier Ave. S, and MLK Jr. Way S. creating moderate land use impacts, and reducing scale transition at the north part of the urban village along S. Columbian Way. Blocks fronting onto S. Edmunds St. to the east of light rail, and several other blocks at the periphery of existing commercial areas, would be changed to lowrise with a Residential Commercial (RC) designation allowing for small scale commercial uses. This change create land use impact, but the degree is reduced to moderate by the RC commercial space size limitations. Columbia City's expansion area under Alternative 2 would cover 23 acres, which is a small percentage of the total urban village area, and would be likely to experience density, intensification of use, and scale impacts, resulting in moderate impact. Transition conflicts are mitigated in most of the urban village expansion by the presence of a greenbelt and rising topography to the west of the village expansion.

Lake City. Several areas of existing commercial zoning, on large parcels in low intensity commercial use with existing surface parking lots, would be changed to allow highrise scale development, introducing scale impacts that result in moderate land use impact. There is potential for significant impact in these blocks proposed for tower scale development, that are located around the existing neighborhood core along Lake City Way.

First Hill-Capitol Hill. A swath of land in north Capitol Hill currently characterized by multifamily housing and zoned LR3, would be changed to Midrise, introducing potential scale impacts, resulting in moderate land use

impact. The area is generally bounded by E. Aloha St. and E. Roy St. at the north, and the midblock north of E. Pine St. at the south. Scale impacts would also occur in the First Hill area on the southwest side of the village, but would be minor in nature due to the already tall zoning envelopes in this area.

North Beacon Hill. Areas of existing single family zoning at the edges of existing commercial and multifamily zones in the Beacon Ave. N corridor would be changed to multifamily, resulting in moderate land use impact and some significant land use impacts. Blocks between 17th Ave. S., and 18th Ave S. to the east of Beacon Ave., and blocks between S. McLellan St. and S. Steven St. west of Beacon Ave. would be changed from single family to Lowrise 3 resulting in significant land use impact. Several blocks of single family zoning adjacent to Jefferson Park would also be changed to multifamily resulting in a moderate impact. Overall, scale impacts would mostly be limited to a 15 feet increase in height. North Beacon Hill's expansion area under Alternative 2 would be 83 acres in size and would include both (M) and (M1). The expansion area along Beacon Avenue and Spokane Street would have potential height increases of up to 15 feet. Single family residential areas within the expansion area would have impacts associated with increased density without experiencing impacts related to scale or change of use. Where the urban village expands, a transition to single family areas is generally provided with a RSL zone.

North Rainier. Areas with a mix of existing multifamily and commercial zoning and uses to the south of the future light rail station, would have increases allowing greater intensity of use, and scale, creating moderate land use impacts. Changes in this area have potential for significant land use impact considering the close proximity of increased residential uses to heavy vehicle noise and traffic near I-90. Additionally, areas of existing single family zoning at the edges of existing commercial and multifamily zones would be changed to lowrise multifamily, resulting in moderate impacts. North Rainier would gain an additional 38 acres under Alternative 2's expansion area. These areas would see between 0 and 30 feet in height increases and would have both (M) and (M1) changes. The urban village expansion area at the east of the village in the vicinity of 30th Ave. S would change zoning from single family to Lowrise 1, which would have moderate land use impact, with potential for significant impact due to an existing condition of established, consistent architectural and urban form context of homes near the Olmsted Boulevard.

23rd & Union-Jackson. Areas with a mix of existing multifamily and commercial zoning and uses to the north of the future light rail station, would have increases allowing greater intensity of use, and scale,

resulting in moderate land use impact. Changes in this area have potential for significant land use impact considering the close proximity of increased residential uses to heavy vehicle noise and traffic near I-90. Additionally, areas of existing single family zoning at the edges of existing commercial and multifamily zones would be changed to lowrise multifamily throughout the urban village, resulting in moderate impact. The urban village boundary would expand towards the future light rail station to a greater degree than in Alternative 3, and in this location would apply more Lowrise 3 and Lowrise 2 designation (instead of Lowrise 1). The 23rd & Union-Jackson expansion area would include the area to the south of the current boundary near Interstate 90. The expansion area would predominantly see (M1) changes, and increased height impacts would be between 5 and 30 feet. Where Lowrise zoning is added at the edge of the urban village transitions to Single Family zoned areas would be reduced including along E. Alder St., and 20th, 21st and 25th Ave.

Northgate. A few large blocks between NE 97th Place and NE 103rd Street west of 4th Ave. NE, already in neighborhood commercial zones, adjacent to the future Northgate light rail station would see height limits substantially increased to allow towers, creating a scale change to a degree that would create moderate, to potentially significant land use impact depending on design choices and building configuration when new development takes place. In a location west of I-5, west of Meridian Ave. N one block of land would be changed to add land to the urban village in an areas of existing multi-family and commercial use, creating a moderate impact, and reducing the transition to adjacent single family zoned areas. One block of single family zoning that contains several homes on large lots on the west half of the block on Wallingford Ave. N. between NE 103rd St. and NE 105th St. would be changed to LR2 creating potential for moderate to significant land use impacts.

Urban Villages with Low Displacement Risk and Low Access to Opportunity

For areas with low displacement risk and low access to opportunity, density and height increases would lead to impacts on land use patterns as existing buildings are gradually replaced with newer and larger developments. Both urban villages in this category, Aurora-Licton Springs and Morgan Junction, would have more density increases than under Alternative 1 and less density increases than under Alternative 3. Height limit increases in both urban villages would be greater than Alternative 1 and similar to Alternative 3. The land use pattern would result in more density and changes to the physical form of single-family residential areas than both Alternatives 1 and 3.

Specific urban villages with potential for land use impact are described below. While not every potential land use impact is described in detail, the descriptions focus on significant impacts, or the greatest potential for significant or moderate impact.

Morgan Junction. Areas of existing single family zoning at the edges of existing commercial and multifamily zones at the periphery of the neighborhood business district, would be changed to multifamily, with potential for scale, use, and density impacts, that would result in moderate land use impact. These include blocks between SW Graham St., and SW Raymond St., a block north of Fauntleroy Way SW, and a block along 44th Ave. SW to the north of SW Holly St. Transitions to single family areas outside of the urban village would be provided with the RSL zone.

Aurora-Licton Springs. Areas of existing single family zoning at the edges of existing commercial and neighborhood commercial zones in the Aurora Ave. N corridor would be changed to lowrise multifamily, with potential for scale, use and density impacts, creating moderate land use impact. Existing Commercially zoned lands in the Aurora Ave. corridor would be redesignated to Neighborhood Commercial to encourage a more pedestrian friendly environment, a change that does not render an adverse land use impact. Transitions to single family areas outside of the urban village would be provided with the RSL zone.

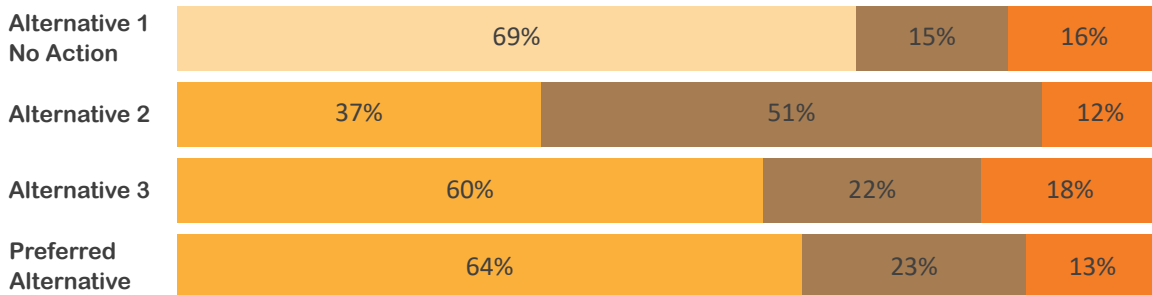
Overall Impacts to Villages and Expansion Areas

Alternative 2 would not explicitly consider risk of displacement or access to opportunity when distributing capacity increases to various urban villages. Some villages would experience greater impacts related to density, scale, and intensification of land use than others. Under this alternative the villages with the greatest land use and density impacts include Roosevelt, First-Hill Capital Hill, 23rd & Union-Jackson, North Beacon Hill, North Rainier, Columbia City, Othello, and Rainier Beach. Under this alternative, urban Villages with the greatest impacts to scale would be include First Hill-Capitol Hill, North Rainier, Rainier Beach, Westwood Highland Park, Northgate, and Lake City.

Distribution of Zoned Land Use

Another way to compare and summarize the land use impacts of the Alternatives is to consider the percentages of land zoned for different uses, as seen in Exhibit 3.2–7. For the purposes of this analysis Residential Small Lot (RSL) zones are broken out from Single Family zones due to some differences in character, although RSL is technically a single family land use and zone.

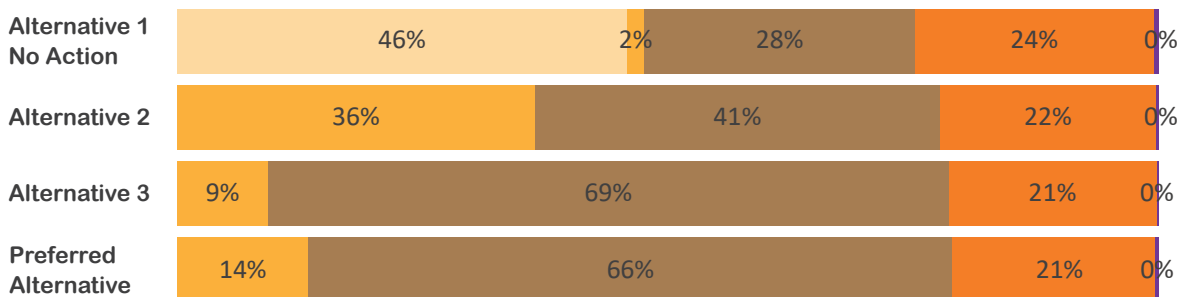
High Displacement Risk & Low Access to Opportunity



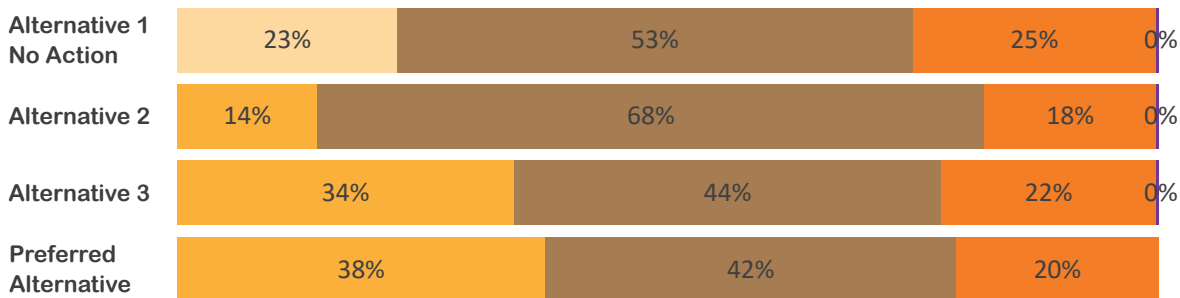
New to the FEIS

FEIS Exhibit 3.2–7 now includes the Preferred Alternative since issuance of the DEIS

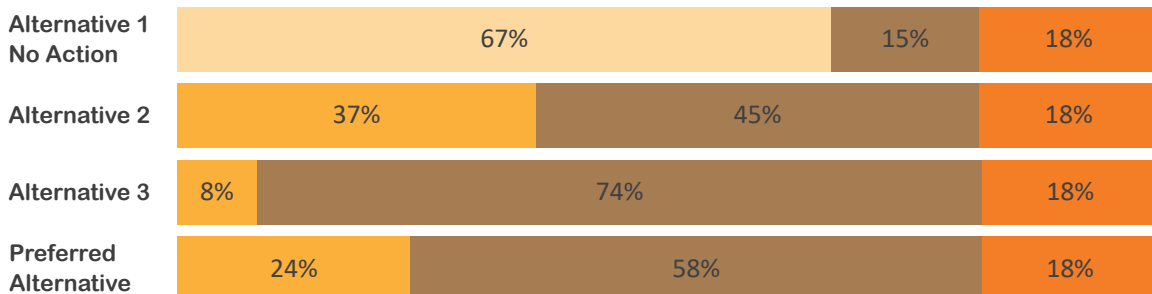
Low Displacement Risk & High Access to Opportunity



High Displacement Risk & High Access to Opportunity



Low Displacement Risk & Low Access to Opportunity



Single Family Residential Small Lot Multifamily Commercial/Mixed-Use Industrial

Exhibit 3.2–7 Percentage of Zoned Land Use

Source: City of Seattle, 2017; BERK, 2017.

Exhibit 3.2–7 shows that in Alternative 2, compared to No Action there is a shift in zoned land use away from Single Family to other land uses, as Single Family zones within urban villages are replaced. Greater percentage of multifamily zoned lands result in the urban villages regardless of the displacement risk and access to opportunity. In Alternative 2, compared to No Action the percentage of land in commercial / mixed use remains about the same or decreases slightly. Decreases in commercial mixed use are explained by urban village expansions where RSL or multifamily zoned lands are added.

For high displacement risk and Low Opportunity areas (Rainier Beach, Othello etc.) Alternative 2 would result in a greater share of multifamily zoned lands than Alternative 3, and a smaller percentage of RSL zoned lands.

For low displacement risk and High Opportunity areas (Wallingford, Fremont, Green Lake-Roosevelt etc.) Alternative 2 would result in smaller percentage of multifamily zoned lands than Alternative 3, and a larger percentage of RSL zoned lands.

Consistency with Policies and Codes

Rezoning to implement MHA under Alternative 2 would be generally consistent with Comprehensive Plan policies and Land Use Code requirements. With few exceptions, the areas currently zoned Single Family 5000, Single Family 7200, and Residential Small Lot proposed for rezoning under Alternative 2 are either in existing urban villages and designated as Residential Urban Village or Hub Urban Village on the FLUM or are in proposed urban village expansion areas. As a part of the proposal, certain land use code rezone criteria would be modified to maintain consistency between proposed changes to single family zones in urban villages and the criteria.

Two locations, outside the Westwood Highland Park and Rainier Beach urban villages may not meet all current criteria in the Land Use Code for rezoning of single family parcels to more intensive zones. These areas are proposed as part of MHA to increase immediate affordable housing investment opportunities on sites in public ownership, or ownership by a non-profit affordable housing provider.

IMPACTS OF ALTERNATIVE 3

Under Alternative 3, the study area land use pattern would generally align with the distribution of growth anticipated in the Seattle 2035 Comprehensive Plan. Like Alternative 2, some areas would be encouraged to develop with incrementally more density and scale than under Alternative 1 No Action. In Alternative 3 changes in development capacity consider the equitable development typology identified in the Growth and Equity Analysis when assigning the zone changes. The areas receiving relatively larger capacity increases, and also experience greater land use change, are those urban villages and expansion areas identified as having low displacement risk and high access to opportunity. In these locations, the production of more housing and MHA affordable housing in particular could reduce displacement impacts and could have positive impacts of improving access to opportunity for people of diverse socioeconomic backgrounds. Please see the discussion in Section 3.1 Housing and Socioeconomics.

Exhibit 3.2–6 shows the breakdown of MHA tiers for the overall study area under Alternative 3 and for urban villages categorized according to the displacement risk and access to opportunity typology. Potential land use impacts to locations in these categories are discussed in more detail below.

Impacts to Urban Villages

Under Alternative 3, decisions about where to focus capacity increases, and the extent of capacity increases, which could result in land of changes, would be guided by consideration of the risk of displacement and access to opportunity of individual urban villages. The analysis below describes the impacts on individual villages (and their expansion areas, where applicable), grouped by the equitable development typologies. All urban villages with a frequent transit station studied for urban village expansion as a part of the Seattle 2035 Comprehensive Plan would receive an urban village expansion reflective of a 5-10 minute walkshed from the frequent transit stations.

Urban Villages with High Displacement Risk and Low Access to Opportunity

Under Alternative 3, areas with low access to opportunity and a high displacement risk would be considered for incremental capacity increases compared to Alternative 1 (i.e., Seattle 2035 Comprehensive Plan). Most development capacity increases would be (M) tier rezones

(93 percent) and there would be limited (M1) tier rezones (7 percent). No (M2) rezones would be implemented in the urban villages in this category, which include Rainier Beach, Othello, Westwood-Highland Park, South Park, and Bitter Lake. As a result, compared to Alternative 2, urban villages in this group would have much lower amounts of lands in the (M1) and (M2) tiers where land use impacts are more likely.

Urban Village expansions for these same urban villages would be smaller than under Alternative 2. Boundary expansions would approximate five-minute walksheds from frequent transit stations, compared with 10-minute walkshed under Alternative 2. Urban village expansions under Alternative 3 would promote a relatively more compact pattern of land use intensity around transit nodes compared to Alternative 2.

Specific areas with potential for land use impact in Alternative 3 are described below. While not every potential land use impact is described in detail, the descriptions focus on significant impacts, or the greatest potential for significant or moderate impact.

Rainier Beach. In a few blocks directly adjacent to the Rainier Beach light rail station, height limit would increase, changing potential scale of development, and several limited existing Single family areas to the north and west of the station, would become multifamily zones with potential for density, scale, and use impacts. These changes would result in moderate land use impact. The extent of these changes is more localized to the light rail station than in alternative 2. Rainier Beach would have a 16 acre expansion on the west side of the current village boundary, wherein single family areas would have minor land use impacts due to density increases under the (M) Tier changes. In most cases a transition to single family areas is provided with the RSL zone. At the south of the urban village some Lowrise would be located at the edge, however it would be adjacent to a band of rugged hillside lands that would mitigate transition conflicts.

Westwood-Highland Park. A few blocks of existing single family zones in transitional areas behind existing commercial zones would be rezoned to multifamily, creating potential for use, scale, and density impacts, resulting in moderate land use impact. The extent of these changes is more limited than in alternative 2, and is found in two locations along 18th Ave. SW and 28th Ave. SW. The changes to scale in these two locations would be consistent between Alternatives 2 and 3.

South Park. Several blocks would be rezoned from Single Family to Lowrise north and south of existing multifamily areas flanking S Cloverdale St. These changes are more limited than in Alternative 2,

located along the south frontage of S. Sullivan St. and along S. Donovan St. A large portion of South Park would have no zoning changes and no MHA implementation under Alternative 3, retaining existing Single Family zoning. As with Alternative 2, some changes to scale in the range of 5 to 15 feet would occur along S Cloverdale St.

Urban Villages with Low Displacement Risk and High Access to Opportunity

Urban villages with low displacement risk and high access to opportunity would experience development capacity increases through zoning changes and boundary expansions to approximate 10-minute walksheds from transit nodes. In Alternative 3, most urban villages with low displacement risk and high access to opportunity have at least some blocks with (M2) tier rezones. Compared to Alternative 2, land use changes in these neighborhoods would be relatively greater, with larger increases in intensity and potentially greater conflicts. The nature of potential impacts is discussed above, and in Section 3.3 Aesthetics pertaining to aesthetics and development character. Compared to Alternative 2, urban villages in this group would have a much higher percentage of land in the (M1) and (M2) tiers, where land use impacts are more likely (55 percent compared to 23 percent).

Specific areas with potential for land use impacts in Alternative 3 are described below. While not every potential land use impact is described in detail, the descriptions focus on significant impacts, or the greatest potential for significant or moderate impact.

Green Lake. Several areas of existing single family zones in transitional areas behind existing commercial zones would be rezoned to multifamily, creating potential for use, scale, and density impacts, resulting in moderate impact. A swath of land at the east of the village would be changed from Lowrise multifamily to midrise multifamily creating potential for scale impacts, and moderate land use impact. However, a high percentage of lands in the area are already developed with relatively dense multifamily housing, which would mitigate context and scale impacts of additional multifamily housing in the area. Allowed height increases between 5 to 15 feet would be allowed for a large portion of the village.

Roosevelt. All areas of existing single family zoning within the urban village would be changed to varied Lowrise multifamily zones, creating potential for use, density and scale impacts, resulting in moderate and some significant land use impacts. These areas are at the periphery of the commercial core extending to the village boundary. In areas including

blocks north of Ravenna Park and blocks north of Roosevelt High School, zoning changes to Lowrise 1 and 2 zones have potential for significant land use impact due to the existing condition of consistent, established architectural and urban form character. One area of existing single family zoning in the vicinity of the large Calvary Baptist church structure would be changed to Lowrise 3 creating potential for significant impact, although the impact of this specific change is moderated by the presence of the existing church structure and other recent development in the immediate area.

The urban village boundary would be expanded east of 15th Ave NE, where several blocks of existing single family zoning abutting 15th Ave. NE and NE 65th St. would be changed to Lowrise multifamily, creating potential for scale, density and use impacts that result in moderate impact. Currently these areas are predominantly single family and would see impacts to density, with the (M1) areas potentially experiencing intensification of use as well as scale impacts. However, the pattern of existing commercial and multifamily structures fronting NE65th St. to both the east and west of the proposed expansion area mitigate potential use incompatibility at this location. In total, Roosevelt's urban village boundary expansion would be 17 acres, and would have a mix of (M) and (M1) Tiers applied. Proposed RSL areas extend several additional blocks further compared to Alternative 2, and would provide transition to single family zoned areas outside of the village.

Wallingford. All areas of existing single family zoning within the urban village would be changed to varied Lowrise multifamily zones, creating potential for use, density and scale impacts, resulting in moderate and some significant impacts. Changes from Single Family to the LR2 and LR3 zone would occur at transitions behind existing neighborhood commercial zones. The area between Stone Way North and Aurora Ave North would have a high concentration of such changes. While this area is already characterized by a mix of small multifamily, and single family structures, the proposal would create potential for focused significant land use impacts here. Lowrise 2 and Lowrise 3 zoning would be located along the frontages of Midvale Ave. N., which has a narrow right of way, which could increase the severity of a major land use change due to complications for vehicle circulation to markedly larger scale buildings. Lowrise 2 zoning is proposed for the frontages of Woodland Park Ave. N., which has a much wider right of way, which could better accommodate increased circulation demands associated with greater density. A triangular area bounded at the northwest by Green Lake Way would be changed from single family zoning to Lowrise 3 creating significant land use impacts, although the potential for impact is mitigated

to some degree by close proximity to mixed commercial uses. Transitions would be reduced at all edges of the urban villages as Lowrise 1, 2, and 3 zones would be located across street right of ways from adjacent single family zoned lands.

Ballard. In the urban village boundary expansion at the east edge of the village, existing single family zoned areas would change to Neighborhood Commercial and multifamily along NW Market St and adjacent blocks, creating potential use and density impacts, that would result in moderate impact. The expansion is larger in Alternative 3 and includes more Lowrise multifamily instead of RSL, resulting in moderate land use impact in a larger area of existing single family zoning. Ballard's expansion area under Alternative 3 would be 48 acres in size and would result in a variety of impacts as a result of the application of all three MHA Tiers. The greatest impacts would be concentrated along NW Market St. However, high intensity mixed used along Market St. to the west, and other multifamily uses along Market St. to the east, would mitigate use and scale impacts in the location. Heights would be allowed to increase between 5 and 30 feet in the expansion area. Existing Lowrise zoned lands along NW 60th St. and the vicinity would be increased to a higher density Lowrise zone creating moderate land use impact.

Madison–Miller. All existing single family zoning in the urban village near the community center would change to multifamily, creating potential for use, scale, and density impacts, resulting in moderate and some significant land use impacts. The extent of the change to multifamily is greater than in Alternative 2. An existing condition of consistent, established architectural and urban form character present in blocks along 18th, 19th, and 22nd Ave. E, heighten the potential for significant land use impact. The area between E. John St. and E. Thomas St., and 21st and 23rd Ave. E. would be changed from Single Family zoning to Lowrise 3 creating significant impact. Additionally, multifamily zoning would replace the city's only existing area of RSL zoning.

Eastlake. The zoning of several blocks west of Interstate 5 would change from Lowrise 3 to Midrise, creating the potential for a scale change impact, resulting in a moderate impact. The severity of this change could be increased due to the potential location of increased residential density in proximity to high amounts of noise and traffic on the nearby I-5 freeway. Height limit increases of up to 15 feet would occur in a majority of the village. The extent of the intensification of use and density impacts would be greater than under Alternative 2. An area of Lowrise 2 zoning east of Yale Ave. would be proposed for Lowrise 3 zoning. Impacts of the

resulting height increase from this change could be heightened due to the topography that slopes down towards Lake Union.

Admiral. All blocks of existing single family zoning within the urban village in transition areas between existing neighborhood commercial zones and the edges of the village, would be changed to Lowrise multifamily, creating potential for density, scale, and use impacts, resulting in moderate and some significant impacts. The share of multifamily, rather than RSL, is greater in Alternative 3. One block located to the northwest of the 45th Ave. SW and SW Lander St. intersection, with existing single family zoning that is in a transition area to existing neighborhood commercial and lowrise zoning, would be changed to Lowrise 3 zoning, creating potential for significant impact. However, since the site is not currently in single family residential use, impacts of denser multifamily development there may have less intense land use impacts than other examples of this zoning change. Transitions to single family areas at all edges of the urban village would be reduced, as more Lowrise zoning would be located adjacent to single family zoned areas.

West Seattle Junction. All areas of existing single family zoning within the urban village would be changed to varied Lowrise multifamily zones, creating potential for use, density and scale impacts, resulting in moderate and some significant impacts. These areas surround the commercial core extending to the urban village boundary, which would expand south and east to a greater degree than in Alternative 2. Several blocks of existing single family zoning would change to Lowrise multifamily, creating potential for scale, density and use impacts. The 47-acre expansion area in Alternative 3 would include both (M) and (M1) Tier changes and would result in height impacts of zero to 15 feet. A band of single family zoning on the east frontage of 32nd Ave. SW, and a several blocks between SW Edmunds St. and SW Hudson St., would change to Lowrise 3 zoning resulting in significant land use impact. Transitions to single family areas at all edges of the urban village would be reduced, as more Lowrise zoning would be located adjacent to single family zoned areas.

Crown Hill. Commercial zones along 15th Ave NW would have height increases, and the depth of the commercial zones would be extended to the east and west of the corridor where existing zoning is single family. Where commercial zones are extended, density, use, and scale impacts could occur, creating significant land use impact. The potential for use impact is notable here, as commercial uses would be allowed to abut streets with existing residential character and use patterns. Additionally, all areas of existing single family zoning in the urban village would be changed to various Lowrise multifamily zones, creating potential for use,

density and scale impacts. The urban village boundary would expand to a full 10-minute walkshed, and most land in the expansion would be RSL, with potential for density impacts only. The Crown Hill expansion area under Alternative 3 would be 84 acres in size and would include density changes in the residential areas. More intense impacts, including significant impacts, would occur along 16th Ave NW. and Mary Ave. NW. There would be few changes to scale in the expansion area, except for the area within one block of 15th Ave NW south of NW 80th St.

Urban Villages with High Displacement Risk and High Access to Opportunity

To avoid catalyzing displacement in areas with high displacement risk and high access to opportunity, this category of urban villages would receive more moderate development capacity increases compared to Alternative 2. Only one urban village in this category would include any tier (M2) rezones, and the remaining villages would primarily implement tier (M) rezones. Changes to land use patterns would resemble those discussed for urban villages with low displacement risk and high access to opportunity. Compared to Alternative 2, urban villages in this group would have a much lower percentage of land in the (M1) and (M2) tiers, where land use impacts are more likely (12 percent compared to 38 percent).

The expansion areas for these urban villages with transit nodes would approximate a walkshed of five minutes or less; the more compact area would result in reduced potential geographic extent of change and potentially fewer conflicts at the boundaries of surrounding residential areas outside of these urban villages.

Specific urban village with potential for land use impact in Alternative 3 are described below. While not every potential land use impact is described in detail, the descriptions focus on significant impacts, or the greatest potential for significant or moderate impact. Columbia City: Several blocks close to the Columbia City light rail station with Single Family zoning would become multifamily zones with potential density, scale, and use impacts, resulting in moderate impact. These changes are more concentrated near the light rail station than in Alternative 2. Blocks fronting S Edmunds St east of the light rail station and several blocks adjacent to existing commercial areas would change to Lowrise with a Residential Commercial (RC) designation allowing for small-scale commercial uses. This creates potential use impacts, but the degree is moderated by the size limitations for commercial spaces in RC zones.

North Beacon Hill. Single-family areas at the edges of existing commercial and multifamily zones in the Beacon Ave corridor would

become multifamily, creating potential for use, scale, and density impacts, resulting in moderate impact. The urban village boundary expansion is much smaller than Alternative 2 and would primarily include RSL zoning, with potential for density impacts only. The Alternative 3 expansion area in North Beacon Hill would include 22 acres at the southern end of the village, including areas along Beacon Ave. There would be no impacts to scale in the expansion area apart from up to 15 feet of height increase along Beacon Ave. Transition to single family areas at the edge of the urban village would be provided with the RSL zone in most instances.

North Rainier. A few blocks with a mix of existing multifamily and commercial zoning and uses south of the future light rail station would have zoning changes allowing greater intensity of use and scale, resulting in some moderate impacts. Existing single-family areas at the edges of existing commercial and multifamily zones would become lowrise multifamily. The extent of the changes to intensity of use are more limited than in alternative 2 while the changes to scale are comparable. A small urban village boundary expansion of about three half-blocks would be located at the east of the village, and would result in minor impacts, since it would be a RSL zone that provides transition to adjacent single family areas.

23rd & Union-Jackson. A few areas of existing single family zoning at the edges of existing commercial and multifamily zones would be changed to Lowrise multifamily, creating potential use, scale, and density impacts, resulting in moderate impacts. However, most existing single family areas in this urban village would become RSL with potential for changes to density only, resulting in minor impacts. An expansion area of 18 acres under Alternative 3 would primarily encompass the area that overlaps with Interstate 90 right of way to the south of the current village boundaries. Developable areas within the expansion area would have scale impacts of up to 30 feet.

Urban Villages with Low Access to Opportunity and Low Displacement Risk

Under Alternative 3, areas with low displacement risk and low access to opportunity would receive moderate development capacity increases through rezones. The urban village boundary expansions would include the full ten-minute watershed expansions from frequent travel nodes, as with Alternative 2. These expansions would result in larger areas in which land use would intensify. In these urban villages, the expansion areas would redevelop with incrementally greater height and density.

Specific areas with potential for land use impacts in Alternative 3 are described below. While not every potential land use impact is described in detail, the descriptions focus on significant impacts, or the greatest potential for significant or moderate impact.

Morgan Junction. Tier (M2) rezones would occur in the center of Morgan Junction, where height limit increases in the business district could create a scale impact, and result in significant land use impact. Few existing structure in the business district are more than 2-3 stories tall. Existing single-family areas at the edges of existing commercial and multifamily zones surrounding the neighborhood business district would become Lowrise multifamily, with potential for scale, use, and density impacts, resulting in moderate and some significant land use impacts. The application of multifamily zoning instead of RSL is more widespread in Alternative 3, creating potential for more severe land use impacts. Blocks including a block north of Fauntleroy Way SW, and a block along 44th Ave. SW to the north of SW Holly St. would be changed from single family to Lowrise 3 creating a significant land use impact. Transitions to single family areas at the edges of the village would be reduced in several locations where Lowrise 1 or 2 zones would be located adjacent to single family zoned areas.

Aurora-Licton Springs. Areas of existing single-family zoning at the edges of existing commercial and neighborhood commercial zones in the Aurora Ave N corridor would become Lowrise multifamily, with potential for scale, use, and density impacts, resulting in moderate land use impacts. In Alternative 3, Lowrise zones would extend to the urban village boundaries. This would reduce transitions to single family zoned areas outside of the urban village. Existing land with Commercial zoning in the Aurora Ave corridor would be redesignated Neighborhood Commercial to encourage a more pedestrian-friendly environment, a change unlikely to cause adverse land use impacts.

Overall Impacts to Villages and Expansion Areas

In Alternative 3 changes in development capacity would be made based on the neighborhood typologies identified in the Growth and Equity Analysis. The villages and expansion areas receiving relatively larger capacity increases, and also experiencing greater land use change, are those urban villages and expansion areas identified as having low displacement risk and high access to opportunity.

Villages with high displacement risk and low access to opportunity would experience relatively less land use impacts than other villages under Alternative 3, and overall fewer land use impacts than under Alternative 2.

Distribution of Zoned Land Use

Exhibit 3.2–7 shows that, like Alternative 2, zoning in Alternative 3 would shift land use from Single Family to other land uses, as Single Family zones in urban villages are changed to multifamily or commercial zones. Urban villages would have more multifamily-zoned land regardless of the levels of displacement risk and access to opportunity. In Alternative 3, compared to No Action the percentage of land in commercial / mixed use remains about the same or decreases slightly. Decreases in commercial mixed use are explained by urban village expansions where RSL or multifamily zoned lands are added.

For high displacement risk and Low Opportunity areas (Rainier Beach, Othello etc.) Alternative 3 would result in a lower share of multifamily zoned lands than Alternative 2, and a higher percentage of RSL zoned lands.

For low displacement risk and High Opportunity areas (Wallingford, Fremont, Green Lake-Roosevelt etc.) Alternative 3 would result in a significantly larger percentage of multifamily zoned lands (69 percent) than Alternative 2 (41 percent), and the percentage of RSL zoned lands would be relatively small (9 percent).

Consistency with Policies and Codes

Like Alternative 2, rezones to implement MHA under Alternative 3 would be generally consistent with Comprehensive Plan policies and Seattle Land Use Code requirements. Most areas currently zoned Single Family 5000, Single Family 7200, and Residential Small Lot proposed for rezoning under Alternative 3 are in urban villages and designated as Residential Urban Village or Hub Urban Village on the comprehensive plan Future Land Use Map or are in proposed urban village expansion areas.

Three specific locations outside the Westwood–Highland Park, Ballard, and Roosevelt Urban Villages may not meet all current criteria in the Land Use Code for rezones of single-family land to more intensive zones. Some of these areas are proposed as part of MHA to further immediate affordable housing investment opportunities on sites in public ownership, or ownership by a non-profit affordable housing provider. In the Wedgewood area west of the Roosevelt urban village, the land use change would support a more active pedestrian friendly environment, as articulated by community members as a preference for the area.

IMPACTS OF THE PREFERRED ALTERNATIVE

Under the Preferred Alternative, the study area land use pattern would generally align with the distribution of growth anticipated in the Seattle 2035 Comprehensive Plan. Like Alternatives 2 and 3, some areas would be encouraged to develop with incrementally more density and scale than under Alternative 1 No Action. As seen in Exhibit 3.2–6 a similar amount of land in the study area would have (M) tier capacity increases in the Preferred Alternative, 78 percent, compared to 73 percent, and 77 percent for Alternatives 2 and 3 respectively. (M) tier increases are the smallest increment proposed and are expected to cause the lowest relative land use impacts.

Similar to Alternative 3, changes in development capacity under the Preferred Alternative would consider the equitable development typology identified in the Growth and Equity Analysis when assigning the zone changes. Relatively greater capacity increases are assigned to urban villages identified to have high opportunity and low displacement risk. As seen in Exhibit 3.2–6, for these urban villages, 51 percent of land would have an (M1) or (M2) MHA tier under the Preferred Alternative, compared to 22 percent in Alternative 2 and 55 percent in Alternative 3. Since capacity increases with an (M1) or (M2) tier have greater potential for moderate or significant land use impacts, urban villages in this low displacement risk / high access to opportunity group would likely have greater land use impacts under the Preferred Alternative. However, within this group of urban villages the quantity of land with (M2) tier capacity increases would be smaller in the Preferred Alternative, 3 percent, than in Alternative 3, 8 percent. This is a result of a reduction of the most-intensive land use changes in portions of some urban villages compared to Alternative 3—including Wallingford, Ballard, Roosevelt and the West Seattle Junction—particularly in existing single family zoned areas.

The Preferred Alternative also focuses relatively more intensive changes to land use in areas proximate to frequent transit stations or nodes. Examples include areas proximate to planned and existing light rail stations in Northgate, Rainier Beach and Columbia City. Land use patterns in blocks immediately surrounding those transit facilities would be expected to change notably over the 20-year timeframe, and moderate or significant land use impacts could occur in these locations.

The Preferred Alternative would direct development capacity increases away from sensitive environmental resources. Locations that would be subject to air quality impacts have the minimum capacity increase necessary to implement MHA under the Preferred Alternative. These

New to the FEIS

Impacts of the Preferred Alternative is a new section since issuance of the DEIS

locations include blocks in proximity to the I-90 freeway in the 23rd & Union–Jackson Urban Village and the North Rainier Urban Village, and certain blocks adjacent to I-5 in the Roosevelt and Green Lake Urban Villages. Land use impacts in these locations would be lower in the Preferred Alternative than in Alternative 3.

The Preferred Alternative would expand the boundaries of urban villages with frequent transit service that were studied for boundary expansion as a part of the Seattle 2035 Comprehensive Plan, to encompass a 10- minute walkshed. Existing single family areas at the outer edges of urban villages with proposed expansion—including Rainier Beach, North Beacon Hill, Othello, and 23rd & Union–Jackson—would experience land use impacts similar to those of Alternative 2. Land use would become denser with more varied housing types, which could result in moderate land use impacts.

Impacts to Urban Villages

Potential land use impacts to urban villages in the displacement risk / access to opportunity categories are discussed in more detail below. The analysis describes potential land use impacts to individual villages (and their expansion areas, where applicable). In general, land use impacts of the Preferred Alternative are within the range studied in Alternative 2 and 3. In some cases, impacts discussed below are described relative to discussion of land use impacts of Alternative 2 or 3.

Urban Villages with High Displacement Risk and Low Access to Opportunity

Under the Preferred Alternative, areas with low access to opportunity and a high displacement risk would be considered for relatively smaller capacity increases compared to Alternative 2. Development capacity increases would primarily be (M) tier rezones (87 percent). Limited (M1) tier rezones (12 percent) and (M2) rezones (1 percent) would be implemented in the urban villages in this category and would be restricted to areas within a 5-minute walk of frequent transit nodes, with few exceptions. This category includes Rainier Beach, Othello, Westwood-Highland Park, South Park, and Bitter Lake. As a result, moderate or significant land use impacts in this group would likely be confined to locations that are closest to a transit station or node.

Urban Village expansions for these urban villages would be generally similar to Alternative 2 and larger than Alternative 3. Boundary expansions would approximate ten-minute walksheds from frequent

transit stations. Beyond a five-minute walk from the high-frequency transit nodes, however, MHA capacity increases would be limited to the minimum necessary to implement MHA (M tier). This would lead to land use impacts in areas of current single family zoning that are more extensive than Alternative 3, but the land use impacts would be minor or moderate in nature. In these outer portions of urban villages, scale and use patterns under proposed zoning would generally be compatible with the existing single family context.

Specific areas with potential for land use impact under the Preferred Alternative are described below. While not every potential land use impact is described in detail, the descriptions focus on significant impacts, or the greatest potential for significant or moderate impact.

Rainier Beach. In the area adjacent to and east of the Rainier Beach light rail station, the Preferred Alternative would rezone blocks closest to the station along MLK Jr. Way S. to SM-RB 125 (M1) with a 125' height limit, while several blocks to the east along S. Henderson St. would be rezoned to SM-RB 85 (M) with an 85' height limit, and blocks to the west of the immediate station area would be rezoned to SM-RB 55 (M) with a 55' height limit. This represents a greater increase in building height and allowed development intensity in this area than either Alternative 2 or Alternative 3, resulting in moderate to significant land use impacts. However, the Preferred Alternative would implement new development standards in the SM zone to mitigate impacts associated with increased development intensity. For example, the new SM zone standards include an incentive structure for an increment of buildable floor area that is only achievable if new structures include employment-generating uses consistent with the Rainier Beach urban design framework planning process. Standards also include building setbacks that are specific to the local street network.

The Preferred Alternative would expand the Rainier Beach urban village boundary in a similar manner as Alternative 2, but it would add an additional 15 acres to the northwest corner of the village. In this area, single family properties would experience minor land use impacts due to density increases under the nearby (M) Tier changes.

Westwood-Highland Park. Similar to Alternative 3, a few blocks of existing single family zones in transitional areas behind existing commercial zones would be rezoned to multifamily, creating potential for moderate impacts due to changes in use, scale, and density. Changes in this village are more localized than under Alternative 2, but of greater

intensity than Alternative 3, though overall changes to scale would be similar in all action alternatives.

South Park. The Preferred Alternative would implement only (M) Tier changes in the South Park urban village, rezoning areas of existing Single Family zoning to Residential Small Lot (RSL) only, and increasing potential heights in existing Lowrise and Neighborhood Commercial zones by no greater than one additional story. These changes are generally of lower intensity than either of the other action alternatives. There would be no changes to allowed uses, and the scale of development would be similar to the existing context. Impacts would not be significant.

Othello. A few blocks of existing single-family areas near the Othello light rail station would be changed to Lowrise 1 multifamily presenting potential for density use, and scale impacts, creating moderate impacts. Some commercially zoned lands along MLK Jr. Way S. would also have potential for scale increase impacts. Under the Preferred Alternative Othello would potentially experience impacts across a larger geography, similar to Alternative 2. However, the land use impact due to the urban village expansion would be less than Alternative 2 because the change of single family zoned area would be to RSL (not Lowrise zoning). A new transition condition would be created for Residential Small Lot at the edges of the urban villages adjacent to Single Family zoned areas outside the urban village. Under the Preferred Alternative the Othello urban village boundary would not be expanded to a walkshed around the future Graham St. light rail station.

Bitter Lake. Land use impacts would be similar to Alternative 3, as potential scale and uses in new development would not exceed that of Alternative 3. Several large blocks of existing Commercial-2 (C2) zoning in the Aurora Ave. corridor would be changed to Commercial-1 (C1) zoning. The effect would be to allow housing where it is currently not permitted, and to limit certain high intensity commercial and light industrial uses. Some moderate land use impact could result due to incompatibilities of housing locating near existing commercial uses.

Urban Villages with Low Displacement Risk and High Access to Opportunity

Similar to Alternative 2, urban villages with low displacement risk and high access to opportunity would experience development capacity increases through zoning changes and boundary expansions to encompass approximate 10-minute walksheds from transit nodes. Most

urban villages with low displacement risk and high access to opportunity have at least some blocks with (M2) tier rezones, as well as large amounts of (M1) tier rezones.

Specific areas with a potential for land use impacts under the Preferred Alternative are described below. While not every potential land use impact is described in detail, the descriptions focus on significant impacts, or the greatest potential for significant or moderate impact.

Green Lake. Changes in Green Lake would reflect a blend of Alternatives 2 and 3, resulting in existing single family zones in transitional areas being rezoned to multifamily and increased height limits permitted in existing Lowrise and Neighborhood Commercial zones. These would create the potential for moderate use, scale, and density impacts in the range of Alternatives 2 and 3, resulting in moderate impact.

Roosevelt. Similar to Alternative 3, much of the existing single family zoning within the urban village would be changed to varied Lowrise multifamily zones, creating a potential for use, density and scale impacts, and resulting in moderate and some significant land use impacts. However, the Preferred Alternative would convert some single family zones near the edges of the village to Residential Small Lot zoning, which would provide a more gradual transition to areas outside the village and reduce impacts to areas north of Ravenna Park or Roosevelt High School, which have established urban forms and architectural character. The largest development capacity increases would be located in the western central portion of the village, near the future light rail station.

The urban village boundary would be expanded east of 15th Ave NE in a manner similar to Alternative 3, except that the village expansion would not extend east of 17th Ave NE. Several blocks of existing single family zoning abutting 15th Ave. NE and NE 65th St. in this area would be changed to a mix of Residential Small Lot and Lowrise multifamily, creating potential for scale, density and use impacts that result in moderate impact. Currently these areas are predominantly single family housing and would see impacts to density, with the (M1) areas potentially experiencing intensification of use as well as scale impacts. However, the pattern of existing commercial and multifamily structures fronting NE 65th St. to both the east and west of the proposed expansion area would mitigate potential use incompatibility at this location.

Wallingford. Similar to Alternative 3, all areas of existing single family zoning within the urban village would be changed to Lowrise multifamily zones, but in the Preferred Alternative most of these would be LR1 zones. The changes to LR1 would create potential for use and density impacts, which could result in moderate land use impacts. The impacts would be similar in nature to those described under Alternative 3 though reduced in magnitude due to the lower-intensity zoning proposed, notably in the area between Stone Way N. and Aurora Ave. N. Several blocks of existing single family zoning at the edges of existing multifamily or commercially zoned areas, or in proximity to open space resources, would be changed to LR2, resulting in the potential for some significant impacts. Under the Preferred Alternative, one area of existing Lowrise zoning that fronts onto N. 45th St. in the vicinity of Interlake Ave. N, would be changed to NC-55 zoning, resulting in a potential change of use impact. Since the remainder of the corridor is already a mix of uses, this change is considered a minor impact.

Ballard. Impacts of the Preferred Alternative in Ballard are anticipated to be similar to those under Alternative 3, with some minor exceptions. The Preferred Alternative would focus greater development capacity increases in the area around the intersection of 15th Ave NW and NW Market St. and along the eastern edge of the village, while slightly reducing the scale of capacity increases in the western part of the village. In the urban village boundary expansion at the east edge of the village, existing single family zoned areas would change to Neighborhood Commercial and multifamily along NW Market St and adjacent blocks, creating potential use and density impacts, that would result in moderate impact. The expansion area is the same as Alternative 3, but rezones in the expansion area south of NW Market St. consist of a greater amount of LR1 zoning and less LR2 and LR3. Similar to Alternative 3, the greatest impacts in Ballard would be concentrated along NW Market St. However, an existing pattern of compatible high intensity mixed uses along Market St. to the west, and other multi- family uses along Market St. to the east, would mitigate use and scale impacts in this location. Heights would be allowed to increase between 5 and 25 feet in the expansion area.

Madison–Miller. Similar to Alternatives 2 and 3, all existing single family zoning in the urban village would change to Lowrise multifamily or Residential Small Lot zoning under the Preferred Alternative, creating potential for use, scale, and density impacts, resulting in moderate land use impacts. The extent of the change to multifamily under the Preferred Alternative is greater than Alternative 2, but reduced in comparison

to Alternative 3. In particular, areas to the north and west of the Miller Community Center would have RSL zoning and would experience reduced land use impacts compared to Alternative 3. Blocks fronting on 19th Ave. east would have potential for greater land use impact than Alternative 2 or 3, where an area of Midrise zoning is proposed in a location of existing multifamily housing. Resulting scale and density impacts would create a moderate land use impact. Several moderate to potentially significant land use impacts could occur in an area of existing single family zoning that would be changed to LR3 fronting 19th Ave. E across the street from Miller Playfield.

Eastlake. Under the Preferred Alternative, development capacity increases in Eastlake would focus mostly in the commercial corridor between Eastlake Ave. E and Yale Ave. E, where the intensity of Neighborhood Commercial zoning would be greater than Alternative 2 or Alternative 3. Land use impacts would be minor to moderate due to greater allowed height for new structures. An area of existing Lowrise 2 zoning between Yale Ave. E. and Minor Ave. E. would also be increased to LR3 as in Alternative 2 and have potential moderate impacts due to the increased allowed height and density. In other areas of the urban village capacity increases and land use impacts would be less than under Alternative 3 and similar to Alternative 2, resulting in a minor to moderate impact. This includes existing multi-family lands to the west of I-5 that could be affected by air quality impacts, and would have the minimum capacity increase needed to implement MHA.

Fremont. Land Use impacts under the Preferred Alternative would be similar to those described for Alternative 3, do not exceed the scale or intensity of Alternative 3, and are lower than Alternative 3 in some locations. In the Preferred Alternative, several blocks along Stone Way Ave. N., between N. 36th St. and N 39th St., would be changed from a Commercial (C) zoning designation to a Neighborhood Commercial (NC) zoning designation, with the same 75' height limit as in Alternative 3. The effect would be to encourage development with a more pedestrian-friendly character; the type of expected development would be compatible with existing conditions in the area and the change is not considered a significant land use impact.

Upper Queen Anne. Land Use impacts under the Preferred Alternative would be similar to Alternative 3, with limited exceptions. The extent of proposed NC-75 zoning near the intersection of Queen Anne Ave. N and W Galer St. would be extended one parcel to the east, and could create increased scale and density impacts. However, the location of existing multifamily zoning would provide a transition. Moderate land use impacts

on single family zones adjacent to the urban village could occur where height increases could allow for buildings that would increase shadowing onto adjacent single family areas, or increase density and activity in close proximity to single family homes. Areas affected in this way would include parcels to the north of the W. Galer St. corridor and south of Crockett St. near to the urban village.

Greenwood-Phinney Ridge. Land Use impacts under the Preferred Alternative would be similar to Alternative 3, with limited exceptions. The extent of proposed NC-75 zoning in the N 85th St. corridor west of Greenwood Ave. would be extended, and could create increased scale and density impacts. However, the location of exiting neighborhood commercial zoning would provide a transition to other lower scale areas. Moderate land use impacts on single family zones adjacent to the urban village could occur where height increases could allow for buildings that would increase shadowing onto adjacent single family areas, or create increased density or activity in close proximity to single family homes.

Ravenna. Land Use impacts under the Preferred Alternative would be similar to Alternative 2. An area is proposed for Neighborhood Commercial zoning with a 75' height limit between 25th Ave. NE and the Burke Gilman Trail, creating potential for intensification of use, and scale impacts. Moderate land use impacts could result, however, topographical separation from lower-scaled areas to the west and compatibility with other high-intensity commercial retail uses across 25th Ave. NE would be expected to lessen potential land use impacts.

Admiral. Impacts in Admiral under the Preferred Alternative would fall within the range of Alternatives 2 and 3. In general, the pattern of development capacity increases would be similar to Alternative 3, though upzones of some Neighborhood Commercial areas near the intersection of SW Admiral Way and California Ave SW would feature allowed heights of 75', similar to Alternative 2. Although minor to moderate land use impacts could result, the presence of other multifamily and commercial zones at the edges of this node would diminish potential land use incompatibility. Existing single family areas in the northwest of the urban village would be rezoned to RSL instead of Lowrise. This would result in potential density, use and scale impacts, which could result in minor land use impact.

West Seattle Junction. Zoning changes under the Preferred Alternative would be similar to the pattern described for Alternative 3, though reduced in intensity. Unlike Alternative 3, not all existing single family zoning within the urban village would be changed to varied Lowrise

multifamily zones; some areas in the north and northeast of the urban village, further from existing transit service, would be rezoned to RSL resulting in minor land use impacts that are less than Alternative 3. Some single family areas close to the neighborhood's commercial core proposed to be rezoned to LR3 in Alternative 3 (SW Edmunds St. vicinity) would be rezoned to LR2. And other existing single family areas at the edges of existing commercial and mixed use zones proposed for LR2 in Alternative 3, would be rezoned to LR1 in the Preferred Alternative. Density, use and scale impacts would still result in moderate or greater land use impacts, but the degree would be less than Alternative 3.

The urban village expansion area would nearly match the boundary under Alternative 2, which is smaller than under Alternative 3. The Preferred Alternative would include a block west of California Ave SW and south of SW Dawson St in the expansion area as in Alternative 3. Overall, the expansion area would include both (M) and (M1) Tier changes and would result in allowed height increases of zero to 25 feet. Single family areas outside of the urban village would be most affected near the Neighborhood Commercial areas at the west edge of the village, which would allow heights of 55 feet and 75 feet.

Crown Hill. Land use patterns under the Preferred Alternative would be similar to Alternative 3, though overall intensity would be reduced, a result of the Preferred Alternative including fewer (M1) and (M2) tier rezones in this village. Commercial zones along 15th Ave NW would have height increases, with larger increases in the (M1) tier focused in blocks to the north and south of the intersection of NW 85th St. on several of the urban villages larger existing commercial land parcels. In only one portion of a block fronting Mary Ave NW the depth of the commercial zones would be extended to the east of the commercial corridor where existing zoning is Lowrise multifamily. Where commercial zones are extended, density, use, and scale impacts could occur, creating significant land use impact. Several areas of existing single family zoning in the urban village would be changed to various Lowrise multifamily zones, in a pattern that would provide a graduated transition in scale from the 15th Ave. NW corridor. Potential for use, density and scale impacts, resulting in moderate land use impacts would result. Existing single family zoned blocks at the periphery of the urban village proposed under Alternative 3 to be rezoned to LR1 would instead be rezoned to RSL. These areas could experience minor land use impacts, although RSL infill development would be of a compatible scale to the existing context of single family homes in the area. The urban village boundary expansion would be reduced under the Preferred Alternative

to exclude an area north of NW 85th St and west of 19th Ave NW. This expansion area would be smaller than both Alternatives 2 and 3.

Urban Villages with High Displacement Risk and High Access to Opportunity

To avoid catalyzing displacement in areas with high displacement risk and high access to opportunity, this category of urban villages would receive more moderate development capacity increases compared to those with lower risk of displacement. Development capacity increases would generally consist of (M) tier rezones throughout each urban village, with targeted (M1) and (M2) tier rezones within a 5-minute walk of frequent transit nodes.

As described in Chapter 2, the expansion areas for these urban villages under the Preferred Alternative would approximate a walkshed of ten minutes, though the most intense development capacity increases would be directed to a 5-minute walkshed from transit, resulting in fewer conflicts at the boundaries of surrounding residential areas outside of these urban villages, similar to Alternative 3.

Specific urban villages with potential for land use impacts are described below. The descriptions focus on potential significant or moderate impacts.

Columbia City. The Preferred Alternative would result in a zoning pattern characterized by less density and a reduced scale of new buildings compared to Alternative 2, but generally greater than Alternative 3. Land use impacts of the preferred Alternative are expected to be less than under Alternative 2. The largest impacts could occur on several blocks close to the Columbia City light rail station where existing Single Family zoning would become multifamily zones; increases in density, scale, and changes in use could result in moderate impacts. These same areas would be rezoned to LR2 and LR3 under Alternative 2 and would be a mix of LR1 and RSL under Alternative 3; the Preferred Alternative would create a mix of LR1 and LR2 zoning in these locations. Blocks fronting S Edmunds St east of the light rail station and several blocks adjacent to existing commercial areas would change to Lowrise with a Residential Commercial (RC) designation allowing for small-scale commercial uses. This change would create potential conflict between uses of different intensity, but the degree of impact would be moderated by the size limitations for commercial spaces in RC zones. A portion of the block fronting 35th Ave. S. near S. Oregon St. is proposed to change

from single family to LR1 within the (M1) MHA tier, even though it is just outside of the 5-minute walkshed from light rail.

North Beacon Hill. Similar to Alternative 3, single-family areas at the edges of existing commercial and multifamily zones in the Beacon Ave corridor would become multifamily, creating potential for conflicts of use, scale, and density, which could result in moderate to significant impacts. The degree of development capacity increases surrounding the Beacon Hill light rail station would be more similar to Alternative 2, converting single family zones to a mix of RSL and Lowrise zones, which could result in moderate to significant land use impacts.

The urban village boundary expansion under the Preferred Alternative would be the same as under Alternative 2, and similar to Alternative 2, the neighborhood commercial areas along Beacon Avenue would have potential height increases of up to 15 feet. Approximately 5 blocks adjacent to Jefferson Park at the south edge of the urban village are proposed for rezone from single family to Lowrise 1, creating a potential for conflicts in scale, density and use impacts that could result in a moderate impact. However, access via nearby arterial roadways and compatibility with other nearby areas of multifamily housing would reduce any potential impact. This area is proposed for LR1 (M1) even though it is outside of the 5-minute walk to light rail.

Northgate. The Preferred Alternative would create a new Seattle Mixed Northgate (SM-NG) zone, which would be applied in the area adjacent to and in blocks south of the future Northgate light rail station. The SM-NG zone would allow for a broad mix of commercial and residential uses including offices, retail, and housing and would include a variety of location-specific development standards to encourage a harmonious configuration of buildings and uses on the sites near light rail.

The existing site of the King-County-owned transit center would be rezoned to SM-NG-240 (M1) and have a maximum FAR of 7.0 and maximum height of 240 feet. Blocks to the South bounded by NE 100th St. and NE 97th St., and Interstate 5 and 47th Ave. NE would be rezoned to SM-NG-145 (M), and have a maximum FAR of 7.0 and maximum height of 145 feet.

North Rainier. Development capacity increases in North Rainier would be focused primarily near the site of the light rail station. Overall, potential development intensity in this village would be less than Alternative 2. The extent of more intensive rezones in the northern portion of the village would be reduced, limiting (M1) and (M2) changes

to areas further south to provide a greater buffer between new development and I-90, thereby addressing noise impacts and air quality impacts identified for Alternative 2. The degree of the capacity increases in existing single family areas at the edges of commercial zones is more limited than under Alternative 2, as more RSL zones are proposed compared to Alternative 2. Minor to moderate land use impacts would result in those areas. Several blocks of existing Commercial (C) zoning along Rainier Ave. S. would be rezoned to Neighborhood Commercial (NC), which would encourage more pedestrian-oriented uses in new development and limit certain auto-oriented uses. This change is not expected to create a greater land use impact. The urban village boundary expansion would generally match Alternative 2, with the exception of the area east of 31st Ave S, which would be excluded.

23rd & Union-Jackson. The Preferred Alternative and land use impacts would be very similar to Alternative 3. However, existing single family zoning at the edges of existing commercial and multifamily zones would be changed to RSL instead of Lowrise multifamily, as proposed in Alternative 3, and would reduce potential impacts related to changes in use, scale, and density. In these locations minor land use impacts would result. The largest development capacity increases would be in the form of increase heights in Neighborhood Commercial and existing LR2 and LR3 zoned areas located in the central and southwestern portions of the village; these areas would include some rezones to Midrise multifamily and one area at the southwestern edge of the village would be rezoned from Industrial Commercial (65 feet) to Neighborhood Commercial with heights up to 75 feet, an increase over Alternative 3. The change to Neighborhood Commercial would not result in greater land use impacts for the area, as the NC zone would encourage more pedestrian-oriented uses that would be more compatible with nearby residential development.

The urban village expansion area would cover the same area as under Alternative 2. Development capacity increases within the expansion area would increase allowable heights by up to 15 feet, a reduction relative to both Alternatives 2 and 3 that would result in minor to moderate land use impacts.

First Hill–Capitol Hill. The Preferred Alternative would focus relatively greater capacity increases near the Capitol Hill light rail station compared to other action alternatives. The degree of change and land use impact would be less than for Alternative 2. Several blocks to the west of the light rail station that are existing LR zones that would be rezoned to Midrise (MR). Potential density and scale conflicts from

new development there could result in moderate land use impacts. Also to the west of light rail, portions of two blocks fronting E. John St. would be changed from existing LR multifamily zoning to Neighborhood Commercial zones, creating potential for use, scale and density impacts. An area of existing NC zoning along 12th Ave. would have a height limit increase from 40' to 75' creating potential for scale and density impacts. Existing buildout of dense multi-family housing in areas west of light rail would lessen the potential for land use impacts. In First Hill proposed changes to the HR zone development standards would allow for taller more slender tower development than existing regulations. Minor land use impacts are expected, and related aesthetic impacts are discussed in Section 3.3 Aesthetics.

Lake City. The scale of capacity increases and land use impacts would be less than Alternative 2, and all proposed MHA zoning changes would be within the (M) tier. Only an incremental change to allowed height would be applied and minor land use impacts would result.

Urban Villages with Low Access to Opportunity and Low Displacement Risk

Under the Preferred Alternative, areas with low displacement risk and low access to opportunity would receive moderate development capacity increases through a mix of (M) and (M1) tier rezones, with very limited (M2) tier rezones.

Specific areas with potential for land use impacts under the Preferred Alternative are described below. The descriptions focus on the potential for significant or moderate impacts.

Morgan Junction. Land use impacts from the Preferred Alternative overall would be within the range of Alternatives 2 and 3. Single family areas around the central commercial node would be rezoned to a mix of Lowrise multifamily zones and RSL; the change would, create a potential for moderate to significant land use impacts,. An area northeast of the commercial district, where a limited area of single family zoning would be rezoned to LR3; the large changes in scale and density could result in significant impacts. Several blocks, including a block along 44th Ave. SW to the north of SW Holly St., would be changed from single family to Lowrise 2 and would result in a moderate land use impact. Transitions to single family areas at the edges of the village would be provided in multiple locations where proposed Lowrise 1 zones and Residential Small Lot zones with the same height limit as the single family zone, would be located adjacent to single family zoned areas. A pedestrian

designation would be added to the zoning designations within the commercial business district.

In contrast to Alternative 3, the Preferred Alternative would apply only tier (M) rezones in Neighborhood Commercial core of Morgan Junction. Height limit increases in the business district would range from 10 to 25 feet, creating moderate scale impacts similar to Alternative 2.

Aurora-Licton Springs. Land use impacts from the Preferred Alternative would be within the range of Alternatives 2 and 3. Areas of existing single-family zoning at the edges of existing commercial and neighborhood commercial zones in the Aurora Ave N corridor would become a mix of Lowrise multifamily and RSL zones, compared to all Lowrise zoning under Alternative 3. In locations at the edges of the urban village, a transition to single family areas outside of the urban village would be provided since Lowrise 1 and RSL zones would have the same height limit as the single family zone, the potential for increased density could result in moderate land use impacts in these locations. The Neighborhood Commercial core between N 100th St and N 105th St would experience height increases between 15 and 35 feet; this would be greater than Alternative 2 but less than Alternative 3. Similar to Alternatives 2 and 3, existing land with Commercial zoning in the Aurora Ave corridor would be redesignated Neighborhood Commercial to encourage a more pedestrian-friendly environment; this change would be unlikely to cause adverse land use impacts.

Overall Impacts to Villages and Expansion Areas

Similar to Alternative 3, changes in development capacity would be made based on the neighborhood typologies identified in the Growth and Equity Analysis, combined with consideration of the presence of frequent transit nodes, environmental constraints, and property ownership by non-profit affordable housing entities. While all villages would receive expansion areas reflecting a 10-minute walkshed from transit, similar to Alternative 2, the Preferred Alternative would direct development capacity increases to those urban villages and expansion areas identified as having low displacement risk and high access to opportunity. Development capacity increases in urban villages with higher displacement risk would be concentrated within a 5-minute walk of frequent transit and on properties owned by non-profit affordable housing organizations.

Distribution of Zoned Land Use

Like Alternative 2 and Alternative 3, the Preferred Alternative would shift land use from Single Family to other land uses, as Single Family zones in urban villages are changed to multifamily or commercial zones, as seen in Exhibit 3.2–7. Changes in the distribution of zoned land use is similar to Alternative 3.

Consistency with Policies and Codes

Like Alternatives 2 and 3, rezones to implement MHA under the Preferred Alternative would be generally consistent with Comprehensive Plan policies and Seattle Land Use Code requirements. Except for one parcel in public ownership, all the areas currently zoned Single Family 5000, Single Family 7200, and Residential Small Lot that are proposed for rezoning are in urban villages and designated as Residential Urban Village or Hub Urban Village on the comprehensive plan Future Land Use Map or are in proposed urban village expansion areas.

3.2.3 MITIGATION MEASURES

INCORPORATED PLAN FEATURES

The Impacts section provides a description of land use impacts, only some of which considered to be significant adverse impacts in the context of Seattle's urban setting. Adopted regulations and commitments include the implementation of land use policies and zoning patterns that consider the potential for land use incompatibilities and avoid them through use of transitions in intensity, use restrictions, and/or avoiding proximity of certain kinds of zones. These measures are already implemented through the Land Use Code (Title 23) in general, through the adopted MHA framework (SMC 23.58.B and 23.58.C), SEPA rules and policies (Title 25), and Design Review (SMC 23.41)

The Action Alternatives include the following features intended to reduce adverse impacts associated with MHA implementation:

- The production of more low-income housing would allow more people including low-income households to live in areas with high access to opportunity.
- Changes in intensity permitted by MHA rezones are generally minor to moderate in degree. Although some changes to land use would occur in rezoned areas, most would not be considered significant

when viewed in the context of existing land use patterns and the city's planned growth. Anticipated changes are generally consistent with the Seattle 2035 Comprehensive Plan.

- Expanding urban village boundaries near high-frequency transit and increased housing capacity in these areas would allow more households (both low-income households and those living in market-rate housing) to live near areas with good transit service, improving mobility, reducing additional demand for single-occupancy vehicles, and mitigating against the consequences associated with locating low density development (and thus less residents) near opportunities for transit ridership.
- 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 scale and intensity.
- Adoption of MHA would implement the goals and policies of the Comprehensive Plan, specifically Land Use Policies 1.3 and 1.4. The proposal would increase housing development capacity and provide greater access to affordable housing and services. The action alternatives would also amend development regulations to require transitions between higher intensity and lower intensity zones, specifically through design features, such as upper-story setbacks, increased ground-level setbacks adjacent to residential zones (NC zones), and limits on lot coverage (MR zones). These requirements are further discussed in Section 3.3 Aesthetics.
- In October of 2017, 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 5 years of the ordinance date. The lowered threshold will mitigate land use impact for existing single family zones where MHA is implemented. See also Section 3.3 Aesthetics.

Additionally, the Preferred Alternative would include the following mitigation features:

- Location specific development standards in new Seattle Mixed Northgate (SM-NG) and Seattle Mixed Rainier Beach (SM-RB) station areas would support community-preferred land use patterns at these locations. Standards include required publicly accessible open space, and streetscape improvement standards in Northgate; and incentives for employment-generating uses, and specific setback standards in Rainier Beach.

- Family-sized housing requirement in the LR1 zone. All multifamily developments would be required to provide one family-sized housing unit for every four small housing units. (See also Appendix F).
- 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.
- New tree planting requirement in the Residential Small Lot (RSL) zone. The tree planting requirement is based on a scoring system that requires a minimum number of caliper inches of tree based on the lot size. The requirement provides greater weight for the planting of large tree species.
- Maximum dwelling unit size of 2,200 square feet in the RSL zone. The requirement will encourage infill structures in a scale similar to older stock of single family homes.
- New side-facade modulation and privacy standards in the Lowrise multi-family 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 standards and development regulations and is compatible with surrounding land uses.

OTHER POSSIBLE MITIGATION MEASURES

The following tools are available if the City wishes to proactively mitigate identified land use impacts in the study area:

- Amend zoning regulations in urban villages to explicitly address transitions to surrounding areas, particularly single-family residential areas adjacent to urban village boundaries. Options include transitional height limits, and particular setbacks that would apply to parcels that are adjacent to urban village boundaries. Design standards, as described in the Mitigation Measures section of Section 3.3 Aesthetics may provide mitigation.
- 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. Examples include limiting commercial uses on certain street frontages when changing use from non-commercial

to commercial, or increasing setback requirements to match certain established neighborhood context.

- Address potential land use impacts as part of neighborhood-level planning efforts. This could include measures to address transitions and density and it could include planning for and making investments in livability improvements, such as open space or streetscape improvements near areas of land use impact.
- Create a new development standard to require or incentivize the inclusion of small businesses spaces in neighborhood commercial zones or pedestrian designated zones. Consider combining the standard with other supports for small businesses in neighborhood business districts.
- ~~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.~~

3.2.4 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Under all ~~three~~ alternatives, including No Action, Seattle would experience housing and job growth, much of it 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 characterize ~~rise to the level of a~~ significant land use impacts, and would be an unavoidable consequence of implementing 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.

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.

3.3



AESTHETICS.

This section focuses on potential changes to physical land use patterns, height, bulk and scale of potential development and implications for land use compatibility that could occur if the City implements MHA rezones.

3.3.1 AFFECTED ENVIRONMENT

This section addresses the existing development character and urban form in Seattle, including building height, bulk, and scale. The section also describes the existing regulations that influence the aesthetics of new development. This review provides a baseline for analyzing the impacts of the alternatives citywide and in urban villages.

DEVELOPMENT, HEIGHT, SCALE, AND CHARACTER

As described in Section 3.2 Land Use, Future Land Use Map (FLUM) designations, zoning, and development regulations govern development in Seattle. Development regulations determine permitted uses and the physical form new buildings, including height and setbacks, which influences urban character. This section describes existing regulations that influence the design and scale of urban development and the City's Design Review process.

City of Seattle

The height, bulk, scale, and character of development vary considerably across Seattle. Seattle's zoning regulations include limits on building height, density, floor area ratio (FAR), and lot coverage and minimum setbacks. These qualities all contribute to the overall intensity of development in a given location.

Development intensity describes the extent to which a site is used and the magnitude of development; even among similar land uses, intensity can vary based on design factors. Building height and FAR limits are two important regulations that directly influence how intense a development appears. FAR is the ratio of a building's floor area to the size of its lot. For most Seattle zones, the City has established both a maximum allowed height and a maximum allowed FAR. The relationship between building height and FAR serves as a shorthand for assessing the "bulkiness" of a building. For example, a tall building with a low FAR will occupy less of its building site and appear less "bulky" (although taller) than a relatively short building with a higher FAR, even though both may contain the same volume. Which form is preferable or perceived as more attractive is partly subjective but also depends on the surrounding context. Taller buildings are a common development form that use urban land more efficiently.

Exhibit 3.3–1 identifies maximum allowed building heights in Seattle, providing a general representation of where higher development intensities are allowed under current development regulations. Buildings in most of Seattle are limited to relatively low heights (30–40 feet) and considered lowrise development. Midrise development (roughly 4–7 stories in height) and highrise development is allowed primarily in urban centers and urban villages.

Urban Centers, Urban Villages, and Manufacturing/Industrial Centers

Urban Centers

Exhibit 3.3–1 shows that Downtown and South Lake Union have greater maximum building heights than the other four urban centers. Maximum heights in Downtown are up to 440 feet in north Downtown and unlimited in the commercial core. Maximum FAR is generally less 3.0 in Belltown and along the waterfront but 20.0 in the commercial core. Portions of Pioneer Square have comparatively low height limits but no limit on FAR. In South Lake Union, maximum heights range from 55 to 440 feet, and maximum FAR limits reach 7.0.

Zoning in the First Hill–Capitol Hill, University District, Northgate, and Uptown Urban Centers allows less intensive development. Maximum heights are predominantly 160 feet or lower, and the maximum allowed FAR ranges from 3.0 to 8.0. The Highrise Multifamily zone in First Hill–Capitol Hill allows buildings up to 300 feet in height.

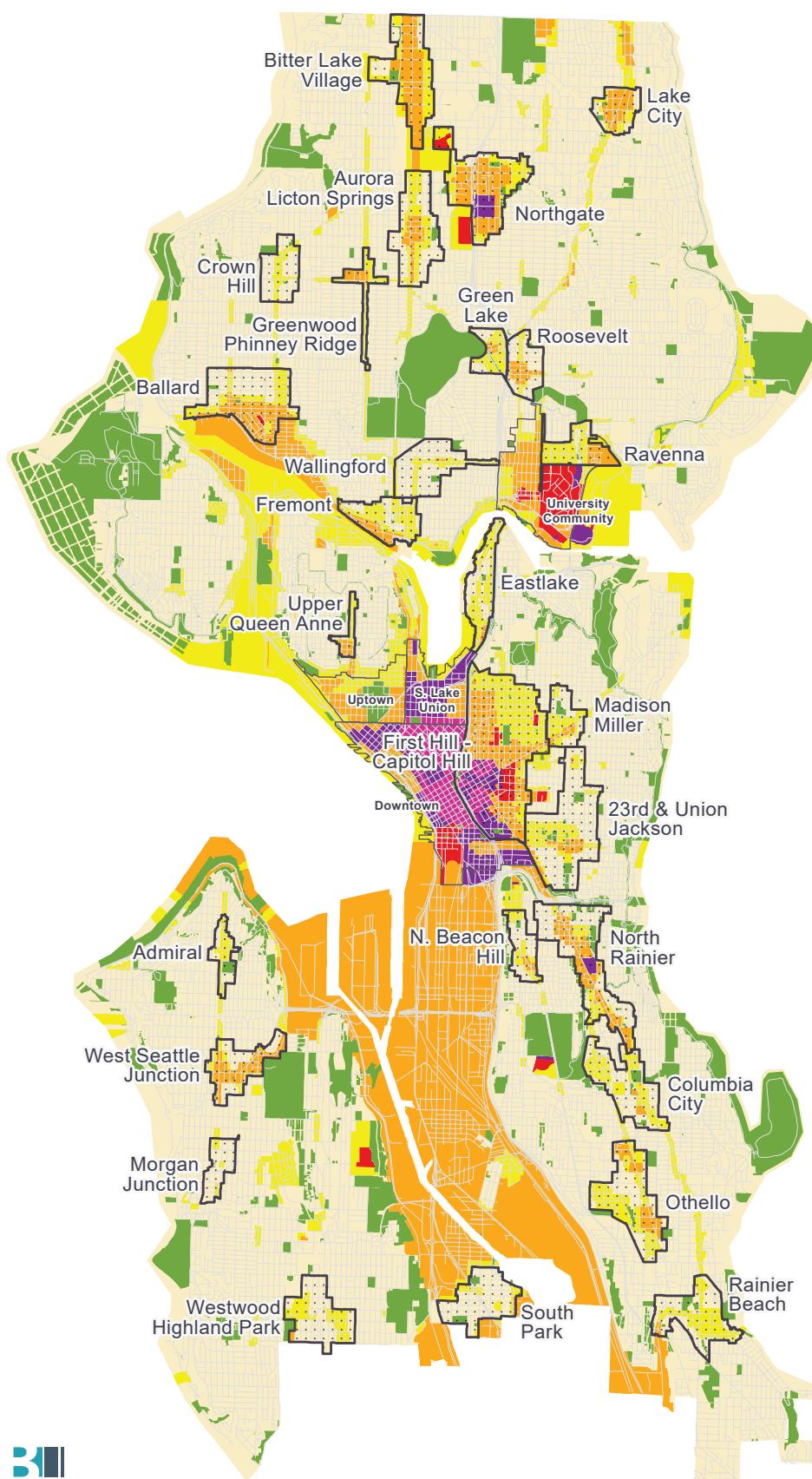


Exhibit 3.3-1
Citywide Allowed Height

Urban Centers/Villages

- In MHA Study Area
- Outside MHA Study Area

Maximum Zoning Heights (Feet)

- ≤ 30
- 31 – 50
- 51 – 85
- 86 – 120
- 121 – 240
- > 240

Source: City of Seattle, 2017; BERK, 2017.

Urban Villages

Many urban villages are predominantly residential in terms of land use and character and organized around a compact commercial/mixed-use node or corridor. The size, mix, and intensity of buildings in these nodes vary among different categories of urban villages. As shown in Exhibit 3.3–1, maximum height limits inside and immediately surrounding urban villages are often similar. But there are exceptions. In Bitter Lake, Lake City, and Greenwood–Phinney Ridge, for example, zoning is predominantly commercial, mixed-use, and multifamily residential where maximum FAR limits are 3.0 or greater.

URBAN FORM

The study area is extensive, encompassing more than 3,000 acres in locations throughout Seattle. Because physical form varies widely across this area, a comprehensive summary is not possible. However, since the proposed action primarily concerns infill development of new buildings in already-developed neighborhoods, documenting common built form conditions provides a baseline for analyzing the proposal's aesthetic impacts. The following examples describe common physical forms that exist in locations the proposal would affect.



Exhibit 3.3–2 Established Single Family Housing Areas

Established single-family areas are common in portions of the study area currently zoned Single Family Residential in urban villages and in proposed urban village expansion areas. Most single-family areas in Seattle have an established pattern of single-family homes, and the ages of the existing housing stock often spans several decades. A typical block often has many homes with an age of 50 years or older. Single-family areas also exhibit a range of home sizes, with many older one- and two-story homes smaller than allowed zoning envelope for new single-family development. Front yards with setbacks of 10–15 feet, often planted with grass or other vegetation, characterize many single-family area.



Exhibit 3.3–3 New Infill Single Family Housing

Existing regulations allow construction of new single-family homes in established single-family areas in the study area. New single-family homes often replace existing older single-family homes, and many exceed the scale of older homes nearby. Compared to older housing stock, modern designs with markedly different architectural characteristics typify many new single-family homes. The City does not require new single-family development to go through Design Review. Infill single-family home development would continue under existing regulations with or without implementation of the proposed action.



Exhibit 3.3–4 Lowrise Multifamily Infill Housing Areas

The study area includes lowrise multifamily areas in urban villages and elsewhere. Due to a mix of existing single-family homes, older multifamily structures, and recently built small multifamily structures characterized these areas, various building heights, scales, and architectural styles characterize these areas. Townhouse development exhibiting neo-craftsman designs was common in the 1990s. Following changes to multifamily development standards in 2010, infill lowrise multifamily housing commonly included townhouses, rowhouses, and small apartment buildings. Recently, development in Lowrise zones has trended towards modern, geometrical styles. Most buildings in these areas are three stories or less.

Exhibit 3.3–5 Mixed Use Commercial Corridors

Most urban villages in the study area include mixed-use commercial corridors, often at the center of an urban village coinciding with a neighborhood business district. Mixed-use commercial corridors also exist along major roadways in urban villages and elsewhere.

Various old and new structures characterize mixed-use commercial corridors. Many structures built in the 1980s and earlier are one-story. Many commercial structures built before the 1950s feature storefronts built to the sidewalk edge, with display windows and pedestrian-oriented entrances.

The study area also includes structures oriented to automobiles with street-facing parking lots and other auto-oriented features. These structures were common in the 1950s through the 1970s.

Development of four- to seven-story buildings has predominated in mixed-use corridors since 1990. These buildings typically include several stories of housing above one story of street-facing commercial uses.

A few corridors in the study area have a consistent pattern of recent mixed-use development for several blocks along both sides of an arterial roadway.



DESIGN REVIEW

Seattle's Design Review Program evaluates the appearance of new buildings and their relationship to adjacent sites. The program reviews most new multifamily, commercial and mixed used development projects in Seattle. Design Review of larger proposed development is conducted primarily by Seattle Department of Construction and Inspections (SDCI) planners with recommendations from neighborhood-based citizen-volunteer boards and public input. Design Review considers issues such as:

- Building and site design, including exterior materials, open space, and landscaping.
- The proposal's relationship to adjacent building, open space, and the street frontage.
- The proposal's relationship to unusual aspects of the site, like views or slopes.
- Pedestrian and vehicular access.

Large proposals required to undergo Design Review must receive a Design Review Board recommendation showing that it meets Design Review guidelines before approval for a Master Use Permit (MUP) and a building permit. For smaller projects, SDCI planners review the proposal

Exhibit 3.3–6 Thresholds for Design Review

ZONE	THRESHOLD WHEN DESIGN REVIEW IS REQUIRED
Design Review Board	
Lowrise 3 (LR3)	More than 8 dwelling units
Midrise (MR) & Highrise (HR)	More than 20 dwelling units
Neighborhood Commercial (NC1, NC2, NC3)	More than 4 dwelling units or 4,000 ft ² of nonresidential gross floor area
Commercial (C1, C2)	More than 4 dwelling units or 12,000 ft ² of nonresidential gross floor area, located on a lot in an urban center or urban village, or on a lot that abuts or is across a street or alley from a lot zoned single family, or on a lot located in the area bounded by: NE 95th St, NE 145th St, 15th Ave NE, and Lake Washington
All zones Congregate residences and residential uses in which more than 50% of dwelling units are small efficiency dwelling units.	Developments containing 20,000 ft ² or more of gross floor
Streamlined Administrative Design Review (SDR)	
All Zones	Development with three (3) or more Townhouse units
All Multi-family and Commercial Zones	If removal of an exceptional tree is proposed and the project falls below Design Review thresholds
All zones Congregate residences and residential uses in which more than 50% of dwelling units are small efficiency dwelling units.	Developments of at least 5,000 but less than 12,000 ft ² of gross floor area
Administrative Design Review (ADR)	
All zones Congregate residences and residential uses in which more than 50% of dwelling units are small efficiency dwelling units.	Developments containing at least 12,000 but less than 20,000 ft ² of gross floor

Source: BERK, 2017.

to ensure that it meets the Design Review guidelines before approving a MUP and a building permit. Design Review thus ensures aesthetic considerations are addressed at the time new buildings are permitted.

Currently, different thresholds of development trigger three types of design review, as summarized in Exhibit 3.3–6 above. Design Review will continue to be required with or without the proposed action.

However, SDCI is in the process of amending the Design Review process in response to a recommendation in the 2015 HALA Action Plan: In October of 2017, City Council passed Ordinance 125429 making amendments to the design review program. The amendments SDCI is considering would set thresholds for Design Review based on a project's gross floor area, rather than the number of residential units proposed. Compared to current regulations, the new regulations would result in slightly lower thresholds in Midrise, Highrise, and some Commercial zones and higher thresholds in Lowrise zones.

New to the FEIS

FEIS Exhibit 3.3–7 is
new since issuance
of the DEIS

~~As of this writing, the proposed amendments~~ The design review process improvements will become effective in July of 2018. have not been approved, but it is possible that future planned development in the study area would take place under the revised Design Review process. Design Review thresholds as amended by Ordinance 12549 are summarized in Exhibit 3.3–7.

Exhibit 3.3–7 Thresholds for Design Review

GENERALIZED ZONES	THRESHOLDS	TYPE OF DR
Site Contain Complex Characteristics (Context, Scale, or Special Features)		
Multifamily and Commercial Zones Outside of Downtown (LR, MR, HR, NC, C, SM)	Less than 8,000	No design review (1) (2)
	At least 8,000 but less than 35,000	Administrative design review
	35,000 or greater	Full design review
Site Does not Contain Complex Characteristics		
Multifamily and Commercial Zones Outside of Downtown (LR, MR, HR, NC, C, SM)	Less than 8,000	No design review (1) (2)
	At least 8,000 but less than 15,000	Streamlined design review
	At least 15,000 but less than 35,000	Administrative design review
	35,000 or greater	Full design review
Specific Uses		
Living Building Pilot Program	Any	Full
Affordable Housing	Any	Administrative
K-12 Schools and Religious Facilities	Any	None

(1) Development of at least 5,000 square feet but less than 8,000 square feet is subject to streamlined design review, if the lot was rezoned from a Single-family zone to a Lowrise 1 (LR1) or Lowrise 2 (LR2) zone within 5 years of the design review process improvements.

(2) Development of at least 5,000 square feet but less than 8,000 square feet is subject to administrative design review, if the lot was rezoned from a Single-family zone to a Lowrise 3 (LR3) zone, or any Midrise (MR), Highrise (HR), or Commercial (C/NC) zone within 5 years of the design review process improvements.

Source: BERK, 2017.

~~Currently~~Previously, new development in portions of the study area proposed for ~~Residential Small Lot~~, Lowrise 1, or Lowrise 2 zoning in the Action Alternatives would not be required to undergo Design Review unless the development exceeds the thresholds described in Exhibit 3.3–6. Under the new design review thresholds, developments over 8,000 square feet in those zones would be required to undergo design review. However, development projects containing more than 5,000 square feet that are rezoned from single family within 5 years of the design review process improvements would be required to undergo design review. This measure is related to MHA, as it would extend design review to lower project sizes for any areas rezoned from single family in order to implement MHA. Other relevant aspects of the design review process improvements include additional requirements for developers to conduct

early community engagement with stakeholders about project proposals.
The new Design Review thresholds are considered in the analysis of
potential impacts in this FEIS.

DESIGN GUIDELINES

The Design Review process evaluates new development according to citywide and neighborhood design guidelines. SDCI planners evaluate proposals for consistency with Design Review guidelines adopted by the City Council. The citywide design guidelines apply to all projects subject to Design Review everywhere but Downtown, which has its own guidelines. Many Seattle neighborhoods also have neighborhood design guidelines, which work in tandem with the citywide guidelines. Applicants with projects located in such a neighborhood must consult both citywide and neighborhood design guidelines in the development and review of the project design. If conflicting, neighborhood-specific guidelines supersede citywide guidelines. Neighborhood-specific guidelines identify priority design issues and seek to ensure that new development is compatible with specific local neighborhood character. 14 of the 27 urban villages in the study area have adopted neighborhood design guidelines as shown in Exhibit 3.3–8 at right.

Exhibit 3.3–8 Urban Villages with Neighborhood Design Guidelines

Urban Village	Neighborhood Design Guidelines	Urban Village	Neighborhood Design Guidelines
23rd & Union-Jackson	No	Morgan Junction	Yes
Admiral	Yes	North Beacon Hill	Yes
Aurora-Licton Springs	No	North Rainier	No
Ballard	Yes	Northgate	Yes
Bitter Lake Village	No	Othello	Yes
Columbia City	No (guidelines apply in the Historic District)	Rainier Beach	No
Crown Hill	No	Ravenna	No
Eastlake	No	Roosevelt	Yes
First Hill-Capitol Hill	Yes—Capitol Hill, Pike/Pine No—First Hill	South Park	No
Fremont	No	Upper Queen Anne	Yes
Green Lake	Yes	Wallingford	Yes
Greenwood-Phinney Ridge	Yes	West Seattle Junction	Yes
Lake City	Yes	Westwood-Highland Park	No
Madison-Miller	No		

Source: BERK, 2017.

PROTECTED VIEWS

Seattle's Comprehensive Plan and Land Use Code establish policies and regulations for the protection of public views of important landmarks and natural features, views from specific designated viewpoints in the city, and scenic qualities along mapped scenic routes. The following sections provide an overview of relevant policies and regulations.

Comprehensive Plan Goals and Policies

The Land Use Element of the Comprehensive Plan establishes the importance of public view preservation:

Policy LU 5.15 Address view protection through:

- Zoning that considers views, with special emphasis on shoreline views;
- Development standards that help to reduce impacts on views, including height, bulk, scale, and view corridor provisions, as well as design review guidelines; and
- Environmental policies that protect specified public views, including views of mountains, major bodies of water, designated landmarks, and the Downtown skyline.

The Land Use Element also encourages the protection of views through policies related to building height limits, minimization of building bulk and the creation of access to views and waterways.

Seattle Municipal Code

Seattle Municipal Code (SMC) 25.05.675.P.2 establishes environmental review policies for public view protection, specifically:

“ It is the City's policy to protect public views of significant natural and human-made features: Mount Rainier, the Olympic and Cascade Mountains, the downtown skyline, and major bodies of water including Puget Sound, Lake Washington, Lake Union and the Ship Canal, from public places consisting of... [a lengthy list of] specified viewpoints, parks, scenic routes, and view corridors... ”

In Downtown, upper-level building setbacks are required for new buildings to protect view corridors along the following streets (SMC 23.49.024):

- Broad St, Clay St, Vine St, Wall St, Battery St, and Bell St west of 1st Ave.
- University St, Seneca St, Spring St, Madison St, and Marion St west of 3rd Ave.

While the Comprehensive Plan and SMC establish the importance of public view corridors and public view preservation, development regulations don't set precise requirements for individual development projects. Protection of public views is deferred to consideration during project reviews and the Design Review process. Attachment 1 to SMC 25.05.675 lists the public views that should be considered for protection during project level review under SEPA. Many of the identified sites are within the study area. Similar consideration of the public view would be given under all alternatives. The Comprehensive Plan and land use code do not establish protection for private views, though the Design Review process may consider impacts to private views.

3.3.2 IMPACTS

This section describes the potential impacts of the ~~three~~ alternatives to aesthetic character in the study area. The ~~Draft~~ EIS recognizes that the evaluation of aesthetic impacts is subjective and can vary depending on an individual's perspectives and preferences. Given the large scale of the study area, impacts to aesthetics and urban design are primarily discussed in a qualitative and generalized manner. Because MHA is a broadly defined, citywide program, this EIS does not provide a detailed or site-specific analysis of aesthetic impacts at any specific location; ~~because~~ the exact form of a given development cannot be accurately predicted and; any such analysis would be speculative. Rather, the EIS assesses aesthetic impacts of the proposed action based on anticipated changes to building form, as described in the MHA Urban Design and Neighborhood Character Study (Appendix F). This chapter also illustrates the building types allowed in the study area and potential changes to building form based on the proposed MHA development regulations. Potential changes are described using graphic examples that are intended to reflect a variety of prototypical rezoning/redevelopment situations that occur in the context of a generalized city

neighborhood/block. An example would be redevelopment of an LR1 zoned parcel in an existing single family neighborhood. These prototypes are not specific to any individual neighborhood or urban center, but rather represent situations that could occur in many neighborhoods in the city as a result of rezoning and future redevelopment. Representative urban villages that reflect each prototypical redevelopment situation are identified in the analysis.

The next subsection discusses the potential impacts common to all alternatives relative to the MHA program elements described in Chapter 2 (i.e., (M), (M1), and (M2) zoning changes, urban village expansions, and changes to development regulations). It includes illustrative models of changes in building form. A subsequent discussion of impacts specific to each alternative addresses the geographic distribution of impacts across the study area and how each alternative would affect the aesthetic character of individual urban villages. The analysis also highlights potential impacts to urban villages according to the displacement risk and access to opportunity categories.

IMPACTS COMMON TO ALL ALTERNATIVES

All the 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. As Alternative 1 No Action would not implement MHA and would not modify existing development regulations, the following discussion pertains only to Alternatives 2 and 3.

MHA implementation under Alternatives 2 and 3 would increase development capacity in the study area, resulting in an incremental increase in the scale and intensity of development. The increase varies by urban village and by alternative. The effects of this increase on development character; building height, bulk, and scale; and views are

discussed below. As described in Chapter 2, MHA implementation would include changes to zoning, development regulations, and the Future Land Use Map:

- **(M), (M1), (M2) Suffix Zoning Changes:** Zoning changes to create additional development capacity under MHA are classified into three categories based on the magnitude of the zoning change:
 - » (M) suffix: Applies when a zone changes to a zone in the same category.
 - » (M1) suffix: Applies when a zone changes to a zone in the next highest category.
 - » (M2) suffix: Applies when a zone changes to a zone two or more categories higher.
- **Urban Village Expansions:** Both action alternatives would expand certain urban village boundaries, as studied in the Seattle 2035 Comprehensive Plan EIS. The expansions would reflect 5- to 10-minute walksheds from frequent transit stations and would vary by alternative.
- **Development Regulation Amendments:** As described in Chapter 2, both action alternatives would amend the Land Use Code to increase maximum height limits and FAR limits for Lowrise (LR), Midrise (MR), and Highrise (HR) Multifamily zones, as well as Commercial (C), Neighborhood Commercial (NC), and Industrial Commercial (IC) zones. Height and FAR limits in the Seattle Mixed (SM) zones in the North Rainier Urban Village and near W Dravus St would also increase. Exhibit 3.3–9 summarizes Land Use Code amendments under the action alternatives, as described in the MHA Urban Design and Neighborhood Character Study and elsewhere in Appendix F.

Zone Categories

Category 1: Single Family, Residential Small Lot

Category 2: Lowrise 1, Lowrise 2

Category 3: Lowrise 3, Neighborhood Commercial 40, Neighborhood Commercial 55

Category 4: Zones with height limits greater than 55' and equal to or less than 95'

Category 5: Zones with heights greater than 95' (requires individual assessment)

Exhibit 3.3–9 Land Use Code Amendments, Alternatives 2 and 3

Zone	Land Use Code Amendments (Alternatives 2 and 3)
Lowrise 1 (LR1)	<ul style="list-style-type: none"> • Remove density limit • Implement family-sized unit requirement. • Increase maximum FAR by 0.1–0.3 depending on building type. • Implement a side façade modulation requirement.
Lowrise 2 (LR2)	<ul style="list-style-type: none"> • Increase height limit from 30 feet to 40 feet. • Increase maximum FAR by 0.1–0.2 depending on building type. • Require an upper-story setback above 30 feet. • Implement a side façade modulation requirement.
Lowrise 3 (LR3)	<ul style="list-style-type: none"> • Increase height limit from 40 feet to 50 feet. • Increase maximum FAR by 0.2–0.3 depending on building type. • Require a 12-foot upper-story setback above 40 feet. • Implement a side façade modulation requirement.
Midrise (MR)	<ul style="list-style-type: none"> • Increase height limit from 60 feet (75 with bonus) to 80 feet. • Increase maximum FAR from 3.2 (4.25 with bonus) to 4.5. • Require upper-story setbacks above 70 feet (15-foot front and 5-foot sides). • Limit building depth to 80 percent of lot depth.
Highrise (HR)	<ul style="list-style-type: none"> • Increase height limit from 300 feet to 340 feet. • Increase maximum FAR (with bonuses): <ul style="list-style-type: none"> » For buildings 240 feet tall or less, increase FAR from 13 to 14. » For building taller than 240 feet, increase FAR from 14 to 15.
Neighborhood Commercial (NC)	<ul style="list-style-type: none"> • NC-30: <ul style="list-style-type: none"> » Increase height limit from 30 feet to 40 feet. » Increase maximum FAR from 2.5 to 3.0 and remove single-use limit. • NC-40: <ul style="list-style-type: none"> » Increase height limit from 40 feet to 55 feet. » Increase maximum FAR from 3.25 to 3.75 and remove single-use limit. » Implement upper story setback above 45 feet. » Implement façade modulation requirement. • NC-65: <ul style="list-style-type: none"> » Increase height limit from 65 feet to 75 feet. » Increase maximum FAR from 4.75 to 5.5 and remove single-use limit. » Implement an upper story setback above 55 feet. » Implement a massing break at 240 feet of width. » Require façade modulation. • NC-85: <ul style="list-style-type: none"> » Increase height limit from 85 feet to 95 feet. » Increase maximum FAR from 6.0 to 7.0 and remove single use limit. » Implement upper story setback above 75 feet. » Implement a massing break at 240 feet of width. » Require façade modulation. • NC-125: <ul style="list-style-type: none"> » Increase height limit from 125 feet to 145 feet. » Increase maximum FAR for single uses from 5.0 to 6.0 and for all uses from 6.0 to 7.0. • NC-160: <ul style="list-style-type: none"> » Increase height limit from 160 feet to 200 feet. » Increase maximum FAR for single uses from 5.0 to 6.5 and for all uses from 7.0 to 8.25

Source: City of Seattle, 2017; BERK, 2017.

Continued on following page

Exhibit 3.3–9 ~~Action Alternative~~ Land Use Code Amendments, Alternatives 2 and 3 (cont.)

Zone	Land Use Code Amendments (Alternatives 2 and 3)
Seattle Mixed (SM)	<p>North Rainier Zones (SM-NR)</p> <ul style="list-style-type: none"> • SM-NR 65: <ul style="list-style-type: none"> » Increase height limit from 65 feet to 75 feet. » Increase maximum FAR from 5.0 to 5.25. • SM-NR 55/75: <ul style="list-style-type: none"> » Increase residential height limit (with bonus) from 75 feet to 85 feet. • SM-NR 85: <ul style="list-style-type: none"> » Increase height limit from 85 feet to 95 feet. » Increase maximum FAR from 6.0 to 6.25. • SM-NR 125: <ul style="list-style-type: none"> » Increase height limit from 125 feet to 145 feet. » Increase maximum FAR from 8.0 to 8.25. <p>Dravus Zone (SM-D)</p> <ul style="list-style-type: none"> • SM-D 40-85: <ul style="list-style-type: none"> » Increase maximum height (with bonus) from 85 feet to 95 feet.

Source: City of Seattle, 2017; BERK, 2017.

Development, Height, Scale and Character

Under Alternatives 2 and 3, MHA zoning changes would increase maximum height limits and allow larger, more visually prominent building forms and greater development intensity. The aesthetic impact of taller and larger buildings can vary substantially depending on an area's existing character, the magnitude of change compared to existing limits, and location relative to other development and sensitive resources, such as parks and public open space. In areas where MHA implementation would allow development to cover greater portions of a lot, potential loss of vegetation or trees could have an aesthetic impact.

Since they approximate the magnitude of an MHA zone change, the (M), (M1), and (M2) tiers are useful for describing how the zone changes could potentially affect development character, intensity, and building scale study area.

(M) Tier Zoning Changes

As described in Chapter 2, zones with an (M) suffix would remain in the same zoning category. (M) zoning changes would result in a similar level of development intensity as the current zoning, in most cases allowing one additional story in new buildings compared to what existing regulations allow.

Where (M) zoning changes occur in existing Lowrise 2, Lowrise 3, Commercial, and Neighborhood Commercial zones, a one-story increase in the height limit would apply and FAR increases would enable additional floor area to occupy the additional height. The proposal wouldn't reduce existing setback requirements and design standards in these areas. Therefore, the primary effect would be taller buildings with the same footprint existing regulations allow.

The height limit would not change for (M) zoning changes in existing Lowrise 1 zones. The proposal would result in only minor increases in the bulk and scale of new buildings. An increase of 0.1–0.2 in the maximum FAR limit could result in some additional floor area compared to existing regulations. But since existing setback and design standards would remain, Lowrise 1 (M) zones would have only minor aesthetic impacts.

In Single Family zones, (M) zoning changes apply only for rezones to Residential Small Lot (RSL). The same maximum height limit would apply to new homes in RSL as existing Single Family zones. However, new homes could be built closer to lot lines and could generally cover 15 percentage points more of a lot's area compared to development under existing regulations.¹ A smaller front yard setback requirement would enable new structures to be closer to the street than the typical pattern in established single-family areas. However, the proposed FAR limit of 0.75 would limit the overall quantity of floor area that could be built on a typical lot to roughly the same amount as could be built under existing regulations for development in Single Family zones. The primary aesthetic impacts would be smaller yards between structures, a reduction in separation from neighboring structures, and a break from the established pattern of front yards on typical streets in single-family areas. Exhibit 3.3–11 shows a conceptual model of RSL infill development associated with an (M) zoning change in an existing single-family neighborhood.

In some higher-intensity zones, height increases associated with (M) zoning changes exceed a single story (30 feet or more). Multi-story height increases occur only where existing regulations already allow tall buildings, thereby making less severe the aesthetic and visual impact of greater height increases. One such development capacity increase would occur in the Highrise Residential (HR) zone. In this FEIS, development

¹ Maximum lot coverage in Single Family zones is 35 percent of lot area for lots 5,000 square feet and larger and 15 percent of lot area plus 1,000 square feet for lots under 5,000 square feet.

standards are proposed for (M) tier capacity increases that are intended to improve urban design outcomes at the time of MHA implementation. The proposed changes would encourage taller tower developments with more slender profiles, instead of bulky, multi-tower developments on large sites. The sections on alternative-specific impacts describe the geographic distribution of these larger height increases.

(M) zoning changes represent the least-impactful tier of MHA rezones, but they still have the potential to affect neighborhood character by allowing taller and larger buildings, changes in building typology, and changes to lot coverage limits and required setbacks. Regardless of change to height limits, the primary aesthetic effect of (M) zoning changes would be increased building bulk and visual prominence due to changes in allowed building forms.

(M1) Tier Zoning Changes

As described in Chapter 2, (M1) zoning changes move lands to a zone in the next highest zoning category. This would result in an increase in development intensity beyond what existing development regulations allow. Similar to (M) zoning changes, (M1) zoning changes may include increased maximum height, FAR, and density limits. In most cases, (M1) zoning changes would result in height limit increases of two additional stories compared to what existing regulations allow, in similar types of buildings and similar footprints.

(M1) zoning changes in existing Lowrise 2, Lowrise 3, Commercial, and Neighborhood Commercial zones with 30- and 40-foot height limits would result in increases of about two stories beyond what current zoning allows. FAR limit increases would enable additional floor area to occupy this extra height. In these areas, existing setback requirements and design standards would remain. The primary effect would be taller buildings that occupy the same general footprint as existing regulations allow.

In higher-intensity zones, including the Midrise zone Commercial and Neighborhood Commercial zones with height limits of 65 feet or more, (M1) zoning changes could result in height increases of 35 feet or more. The sections on alternative-specific impacts describe the geographic distribution of these larger height increases.

(M1) zoning changes in existing Lowrise 1 zone would allow buildings two stories taller than existing regulations allow and would likely result in buildings of a different format. Instead of rowhouses and townhouses

with individual unit entries, the (M1) capacity increase would likely result in apartment buildings with stacked units or, if new zoning allowed, mixed-use commercial structures. An aesthetic change in the predominant building form for infill development could occur.

In Single Family zones, (M1) zoning changes apply for rezones to Lowrise 1 and Lowrise 2. In these areas, infill development would likely take on a different character and format than the established context. New development would likely be a mix of attached rowhouses and townhouses or small multi-unit apartment structures instead of detached single-family homes. Front and rear setbacks in new development would be smaller than many existing buildings. Yards would be smaller than on many existing single-family lots, and some structures could be closer together than existing regulations allow.

(M1) zoning changes would increase building bulk and visual prominence due to greater height, and in some cases more intense building forms allowed by the new zoning. These changes would potentially include smaller building setbacks and more visually prominent building forms, which could reduce the amount of direct sunlight reaching ground level in public rights-of-way and other locations near infill development. Exhibit 3.3–13 and Exhibit 3.3–14 show a conceptual model of an (M1) zoning change from Single Family to Lowrise 1 that results in taller buildings, greater lot coverage, and increased visual bulk.

The City could apply additional design standards, such as upper-story setbacks and façade modulation, in areas with (M1) zoning changes to mitigate the effects of increased height and bulk on neighborhood character. Compatibility impacts could specifically arise where (M1) zoning is adjacent to lower-intensity zones. Design standards, such as increased setbacks for properties on the edges of (M1) zones or graduated height limits or setbacks, could soften abrupt transitions between zones. 3.3.3 Mitigation Measures describes these recommendations.

(M2) Tier Zoning Changes

As described in Chapter 2, the (M2) suffix applies to zones that change to a zone two or more categories higher. (M2) zoning changes represent the greatest level of change from what existing development regulations allow. They would result in increased height and bulk, changes to street-level pedestrian experience, and in many cases different building types. Exhibit 3.3–18 shows a conceptual model of infill development in an existing Single Family zone that becomes a Lowrise 3 (M2) zone.

As shown in Exhibit 3.3–15 and Exhibit 3.3–16, the intensity of potential changes to development character in an area with an (M2) zoning change would exceed (M) and (M1) zones. (M2) zones would allow buildings with three or more additional stories compared to what existing regulations allow. (M2) zoning changes would enable new development types that could differ from existing development and could mark a transition to a different neighborhood character where applied. Examples include the allowance of commercial street frontages in areas until now zoned only for residential uses. Where an (M2) zoning change applies in a single-family area, new infill development would differ markedly in scale and form compared to existing buildings. Like (M) and (M1) zones, impacts associated with (M2) zoning changes would be increased building height, greater visual bulk, and reduced access to light and air at ground level. (M2) zones occur in limited locations in the action alternatives. The sections on alternative-specific impacts discuss their geographic distribution.

Similar to (M1) zoning changes, measures to mitigate effects of increase height and bulk on neighborhood character and the pedestrian environment in (M2) zones could include revised design standards, such as upper-story setbacks and façade and roof form modulation. Compatibility issues could particularly occur where (M2) zoning is adjacent to lower-intensity zones. Design standards, such as increased setbacks for properties on the edges of (M2) zones or graduated height limits, could address conflicts in building scale where (M2) zones contrast with and transition to lower-intensity development. 3.3.3 Mitigation Measures describes these recommendations.

In Exhibit 3.3–10 through Exhibit 3.3–22, white buildings indicate existing context structures built under current zoning or regulations predating current zoning. Buildings in blue are new single-family structures built under existing regulations for Single Family zones. Buildings in gold are hypothetical buildings built under the proposed regulations.

Exhibit 3.3–10
Infill Development
in Single Family
Zone Under Existing
Regulations, No Action
Source: City of Seattle, 2017.



Exhibit 3.3–10, Exhibit 3.3–11, and Exhibit 3.3–12 show a scenario in an urban village where existing Single Family zoning becomes Residential Small Lot (RSL).

The graphics show a No Action scenario of infill single-family development over a 20-year period (Exhibit 3.3–10). This compares with a scenario of infill development over a 20-year period with RSL housing types (Exhibit 3.3–11) in a distributed pattern. The third image (Exhibit 3.3–12) shows a pattern where a high concentration of infill development of RSL housing types is added in a single area in the block.

As illustrated in Exhibit 3.3–10 through Exhibit 3.3–12, the (M) Tier infill development in this example introduces building forms with moderately greater mass and bulk than the existing development pattern, with the same height limit between the No Action and Action alternatives. The result is a slightly more urban character with buildings located closer to the street and slightly less space between pedestrians and the RSL homes.



Residential Small Lot (M)

Exhibit 3.3–11
Infill Development
of Residential Small
Lot (RSL) Housing in
Single Family Context,
(M) Zoning Change

Source: City of Seattle, 2017.



Residential Small Lot (M)

Exhibit 3.3–12
Infill Development
of Residential Small
Lot (RSL) Housing
in Single Family
Context, (M) Zoning
Change—Concentrated
Development Pattern

Source: City of Seattle, 2017.

Relevant urban villages include:

All urban villages with
proposed RSL zoning.

Exhibit 3.3–13 and Exhibit 3.3–14 show a scenario in an urban village with existing Single Family zoning that becomes Lowrise 1 (M1) on one side of the street. The other side is an existing Lowrise 2 zone that receives a standard (M) zoning change and becomes Lowrise 2 (M) with the proposed Land Use Code regulations.

The images illustrate the proposed Lowrise 1 (M1) zoning in an existing single-family context and the relationship of proposed Lowrise 2 (M) zoning to existing single-family structures and infill Lowrise 1 structures across the street.

Aesthetic impacts include the smaller setbacks at the street edge in the Lowrise (M1) zone. Greater lot coverage and smaller side and rear setbacks result in some bulk and scale impacts where infill Lowrise 1 structures are adjacent to existing single-family homes. Impacts could include reduction in privacy for some property owners. Although height limits do not change, aesthetic impacts of the (M1) increase are noticeable in areas zoned for low-intensity uses, such as existing single-family zones.

In the Lowrise 2 (M) example seen in Exhibit 3.3–13 and Exhibit 3.3–14, the primary aesthetic impact is the presence of one additional story compared to existing regulations. Here, the height limit increases from 30 feet to 40 feet, allowing four-story rather than three-story buildings. An upper-level setback, proposed as part of the Lowrise 2 zone changes, mitigates the appearance at street level of additional bulk.

Application of design standards, such as upper-level setbacks, side façade modulation requirements, and privacy standards, in Lowrise zones with (M) and (M1) suffixes would mitigate the effects of increased height and bulk on neighborhood character and the pedestrian environment. 3.3.3 Mitigation Measures describes these recommendations.



Exhibit 3.3–13
Lorise 1 (M1) and
Lorise 2 (M) Infill
Development

Source: City of Seattle, 2017.



Exhibit 3.3–14
Lorise 1 (M1) and
Lorise 2 (M) Infill
Development

Source: City of Seattle, 2017.

Relevant urban villages include:

Columbia City, Fremont, North
Rainier, 23rd & Union–Jackson,
Morgan Junction, and Wallingford.

Exhibit 3.3–15 and Exhibit 3.3–16 show a scenario in an urban village with existing Single Family zoning. On one side of the street the zoning is changed to Lowrise 3 with an (M2) suffix. Zoning on the other side of the street zoning becomes Lowrise 2 with an (M1) suffix.

Exhibit 3.3–15 shows infill development over a 20-year period with lowrise housing types in a distributed pattern. Exhibit 3.3–16 shows a high concentration of lowrise infill development.

In the (M2) area, height limits increase to 50 feet, allowing buildings two stories taller than the existing single-family context. Apartment buildings with stacked units and single building entries, as opposed to detached single-family homes, would mark a change in character from the existing built form. Smaller front and rear setbacks would reduce the amount of yard space compared to development under existing single-family regulations. The street would become more urban in character as the neighborhood experiences new infill buildings.

Application of design standards, such as upper-level setbacks, side façade modulation requirements, and privacy standards, in Lowrise zones with (M) and (M1) suffixes would mitigate the effects of increased height and bulk on neighborhood character and the pedestrian environment. 3.3.3 Mitigation Measures describes these recommendations.



Exhibit 3.3–15
Lowrise 2 (M1) and
Lowrise 3 (M2) Infill
Development

Source: City of Seattle, 2017.



Exhibit 3.3–16
Lowrise 2 (M1) and
Lowrise 3 (M2) Infill
Development—
Concentrated
Development Pattern

Source: City of Seattle, 2017.

Relevant urban villages include:

Columbia City, Crown Hill, Roosevelt,
North Beacon Hill, Othello, Rainier
Beach, West Seattle Junction,
Admiral, Aurora–Licton Springs,
North Rainier, 23rd & Union–Jackson,
Madison–Miller, Morgan Junction,
Wallingford, Westwood–Highland Park.

Exhibit 3.3–17 and Exhibit 3.3–18 display an area adjacent to a public open space in an urban village with existing Single Family zoning that becomes Lowrise 2 (M1). The graphics show a No Action scenario of infill single-family development over a 20-year period. This compares to a scenario of infill development over a 20-year period with Lowrise 2 housing types. The illustration shows relationships of new infill development to the open space including the potential extent of shadowing. The scenario depicts a 5:00 p.m. condition on an equinox for the purposes of evaluating the extent of shadows across the right-of-way.

The impacts of the proposed Lowrise 2 (M1) change are the potential for a building with one more story than existing regulations allow and buildings located closer to the front lot line compared to existing single-family homes. Shadows from buildings reach the open space's edge under the No Action and Action scenarios. Some increase in the amount of shadowing is evident. However, due to the width of the right-of-way the longer shadows extend only a short distance into the public space.

A street-facing upper-story setback aids in reducing the amount of additional shadowing of the adjacent open space. 3.3.3 Mitigation Measures describes these recommendations.



Exhibit 3.3–17
Single Family Infill
Development Adjacent
to a Public Open
Space, No Action

Source: City of Seattle, 2017.



Exhibit 3.3–18
Lowrise 2 (M1) Infill
Development Adjacent
to a Public Open Space

Source: City of Seattle, 2017.

Relevant urban villages include:

Crown Hill, Roosevelt, North
Beacon Hill, Othello, Rainier Beach,
Admiral, Aurora–Licton Springs,
North Rainier, 23rd & Union–
Jackson, Madison–Miller, Morgan
Junction, South Park, Wallingford.

Exhibit 3.3–19 and Exhibit 3.3–20 illustrate a scenario of existing Neighborhood Commercial 40 zoning with a proposed zoning change to NC-55 with an (M) MHA tier capacity increase. The scenario depicts a transition, as the rear of the neighborhood commercial zone, across the street, is an area of existing single family zoned land that has a proposed zoning change to a Lowrise 1 zone with an (M1) MHA tier. Exhibit 3.3–19 shows a No Action scenario for comparison.

This scenario shows the scale relationships of a neighborhood commercial area along an arterial roadway transitioning to a residential area a block off of the arterial roadway. The No Action image shows the relationship of NC-40 existing development to the adjacent single family zoned neighborhood under existing regulations. The other images show the relationship of infill development under proposed NC-55 zoning to the residential neighborhood with proposed new LR1 zoning. Some new infill development under the proposed LR1 zone is shown over the 20-year period alongside single family homes that remain in place.

The primary impact of the (M) Tier capacity increase to NC-55 is the increased height, which allows for the presence of a 5 story building across the street from the residential zone. The additional story contributes to greater visual bulk and has some reduction to the amount of light and air at ground level.

Targeted application of design standards, such as upper-story setbacks and façade modulation (included in Exhibit 3.3–20), may be necessary in transition areas to mitigate the effects of increased height and bulk on neighborhood character and the pedestrian environment.



Exhibit 3.3–19
Transition Area,
No Action

Source: City of Seattle, 2017.



Exhibit 3.3–20
Transition Area,
Lowrise 1 (M1)
and Neighborhood
Commercial (M)
Infill Development

Source: City of Seattle, 2017.

Relevant urban villages are:

Areas with transitions between Neighborhood Commercial zones on mixed use corridors, to residential areas. These include: Upper Queen Anne, North Beacon Hill, Wallingford, Morgan Junction, West Seattle Junction, Crown Hill, Greenwood Phinney-Ridge, and Westwood-Highland Park.

Exhibit 3.3–21 and Exhibit 3.3–22 show a mixed-use corridor with existing Neighborhood Commercial 40 zoning along an arterial road. Exhibit 3.3–21 depicts No Action. Exhibit 3.3–22 illustrates an (M) zoning change on one side of the street to Neighborhood Commercial 55. The other side becomes Neighborhood Commercial 75 with an (M1) suffix. Both scenarios depict potential infill development under the applicable zoning regulations over a 20-year period.

The images display scale relationships of infill development under proposed regulations compared to both existing structures and development that could occur under existing regulations.

The increased building height of both the (M) and (M1) zoning changes would increase visual bulk and reduce access to light and air at street level. Under the action scenario, the street has a more urban character, with a continuous street wall five to six stories tall. From the perspective of pedestrians in the public realm, this results in a different experience and a greater sense of enclosure by buildings.

In both the (M) and (M1) zones, the upper-story setbacks mitigate the appearance of bulk to the building's upper stories as viewed from street level. Façade modulation requirements add variety to the buildings' façades. These design standards may be necessary to mitigate the effects of increased height and bulk on neighborhood character and the pedestrian environment in mixed-use corridors and neighborhood business districts.



Exhibit 3.3–21
Neighborhood
Commercial Zoning,
No Action

Source: City of Seattle, 2017.



Exhibit 3.3–22
Neighborhood
Commercial (M) and
(M1) Infill Development

Source: City of Seattle, 2017.

Relevant urban villages include:

All urban villages with NC-40 or NC-65 zoning.

Urban Village Expansion Areas

The Seattle 2035 Comprehensive Plan EIS (May 2016) analyzed the potential aesthetic and urban design impacts associated with expanding the boundaries of certain urban villages to reflect walksheds around high-frequency transit stations, though no urban village expansions were adopted as part of the Comprehensive Plan update. As described in the Comprehensive Plan EIS, most development in the proposed urban village expansion areas is a much lower-intensity than in the urban villages themselves. Much of these peripheral areas is zoned Single Family, and building height limits are generally lower than inside urban villages.

Because expansion areas are at the edges of urban villages, they would likely function as transitional areas, forming a buffer between the most intense development in the urban village and the low-intensity neighborhoods surrounding it. However, expanding urban villages would, over time, lead to the conversion of existing development to higher-intensity uses, development of taller buildings, and establishment of a more urban character in the expansion areas, compared with existing conditions. This conversion would include the gradual introduction of taller, more prominent buildings with potentially greater site coverage than existing development. Since development tends to be incremental, temporary conflicts of height and scale may arise between older and newer buildings as properties convert to more intense uses at different times.

The location and extent of urban village expansions would vary by alternative, and impacts associated with specific urban village expansion areas are described in the sections on alternatives-specific impacts.

Development Regulation Amendments

As described in Chapter 2 and summarized in Exhibit 3.3–9, both action alternatives would amend the Land Use Code to create additional capacity in Lowrise, Midrise, Highrise, Neighborhood Commercial, Commercial, and Seattle Mixed zones. These capacity increases would result from a combination of increased height, FAR, and density limits. Under Alternative 2, the amended development regulations would apply to approximately 2,286 acres of the study area, slightly less than the Alternative 3, which would apply the amended development regulations to approximately 2,416 acres.

In both action alternatives, these Land Use Code amendments would increase building height and bulk beyond current conditions, which could

alter the character of development in large portions of the study area. The aesthetic impacts of these amendments are described in the description of the (M), (M1), and (M2) zoning changes and in the exhibits above.

View Obstruction and Shading Effects

Under both action alternatives, MHA implementation would result in localized increases in building height and bulk and increased development intensity relative to existing conditions in the study area. Increased height and bulk can interfere with protected view corridors and scenic routes and with private views. Private views are not protected to the same extent as public view corridors, but the Design Review process can consider impacts to them.

Increased building height and bulk in the study area can also increase shading effects on public spaces and private property. Large height limit increases have the potential to generate significant shading effects on the street-level pedestrian environment, especially if several buildings redevelop along a particular street. Taller buildings in transition areas can also potentially shade shorter buildings and properties in adjacent lower-intensity zones. View and shading impacts associated with height increases vary in location under each alternative and are further discussed in the alternative-specific impacts sections.

IMPACTS OF ALTERNATIVE 1 NO ACTION

Under Alternative 1 No Action, MHA would not be implemented. Residential and commercial development consistent with the adopted comprehensive plan would occur over the 20-year planning period, leading to increased development compared to existing conditions, as analyzed in the Seattle 2035 Comprehensive Plan Final EIS. No zoning changes or urban village expansions associated with MHA would occur, and Alternative 1 would not result in any significant aesthetic impacts beyond those analyzed in the Comprehensive Plan EIS.

IMPACTS OF ALTERNATIVE 2

As described in Chapter 2, Alternative 2 would implement MHA, directing most future growth to urban villages, primarily to areas currently zoned for commercial and multifamily development. Alternative 2 would also include expand certain urban village to reflect a 10-minute walkshed around high-frequency transit nodes.

Development Character, Height, and Scale

Impacts to development character, height, and scale under Alternative 2 would resemble those described under Impacts Common to All Alternatives. The following sections describe the distribution of those impacts across the Study Area under Alternative 2.

(M), (M1), and (M2) Zoning Changes

Exhibit 3.3–23 shows the extent and distribution of (M), (M1), and (M2) zoning changes in the study area under Alternative 2. As described in Chapter 2, (M) zoning changes cover the largest portion of the study area: 73 percent of all lands where MHA would be implemented. (M1) and (M2) zoning are concentrated in localized areas. In Alternative 2, 23 percent of lands proposed for MHA have (M1) zoning and only four percent (M2). As described under Impacts Common to All Alternatives, (M1) and (M2) zoning changes generally represent greater changes to building character and bulk than (M) zoning changes due to changes in allowed building types.

(M2) Zoning Changes. Under Alternative 2 the largest areas of (M2) zoning occur in several urban villages in southeast Seattle near existing light rail stations, near the future light rail station between North Rainier and 23rd & Union–Jackson, and near future light rail stations in Roosevelt and Ballard. The largest single area of (M2) zoning would be in the eastern edge of the Othello Urban Village, which roughly corresponds to the proposed urban village expansion area, which is illustrated in Exhibit 2–18.

In Alternative 2 many of the larger areas of (M2) increases, are in areas with high displacement risk and low access to opportunity. Therefore, compared to Alternative 3, more of the localized aesthetic impacts associated with (M2) could be seen in areas with high displacement risk and low access to opportunity. Fewer areas of localized (M2) aesthetic impacts and changes to character would occur in areas with low displacement risk and high access to opportunity. (See also Chapter 2).

(M1) Zoning Changes. Under Alternative 2 several of the largest areas of (M1) zoning are located in urban villages near the center of the city in First Hill–Capitol Hill, Madison–Miller, and between North Rainier and 23rd & Union–Jackson. The largest single area of (M1) is in north Capitol Hill, where a large swath of land currently zoned Lowrise 3 would be changed to Midrise, enabling a roughly three-story height increase in a neighborhood already predominantly characterized by multifamily housing. Southeast and southwest Seattle urban villages would have

sizeable areas of (M1) zoning, including Westwood–Highland Park, South Park, Rainier Beach, Othello, and Columbia City, and West Seattle Junction.


In Alternative 2, many larger areas of (M1) zoning also exists where displacement risk is high and access to opportunity is low. Therefore, compared to Alternative 3, more of the localized aesthetic impacts associated with (M1) zoning changes would occur in areas with high displacement risk and low access to opportunity areas. Fewer areas of the (M1) aesthetic impacts and changes to character would be present in areas with low displacement risk and high access to opportunity.

Height Increases






Increases in the maximum height limit are another way to evaluate the degree of aesthetic impact that could occur. Exhibit 3.3–24 shows the distribution of height increases in the study area due to zoning changes and Land Use Code amendments under Alternative 2. A few localized areas would have large increases in allowed building height of 65 feet or more. The largest height increases under Alternative 2 would occur in Lake City and Northgate. As shown in Exhibit 3.3–22, Alternative 2 would include an 80-foot height increase in Lake City from Neighborhood Commercial 65 to Neighborhood Commercial 145. The location is characterized by existing automobile dealerships on several large parcels. In Northgate, Alternative 2 would include a 115-foot height increase from Neighborhood Commercial 125 to Neighborhood Commercial 240 directly adjacent to the future light rail station on the site of the King County transit center, which has potential for future transit oriented development. Both areas are already heavily urbanized, and surrounding zoning already allows heights in the range of 65–85 feet (Lake City) and 85–125 feet (Northgate). However, the magnitude of these proposed height increases would result in development with high visual prominence that would be much taller than existing buildings. As a designated urban center, Northgate is appropriate for the most intensive development.

First Hill–Capitol Hill also includes height increases greater than 30 feet, specifically the previously mentioned (M2) area of north Capitol Hill and the Highrise zone in First Hill, where existing the existing height limit of 300 feet would increase to 340 feet. Since the Highrise zone already allows for tall structures, allowing 40 additional feet would have minor bulk and scale impacts compared to this magnitude of height increase in other zones.




Exhibit 3.3–23
Locations of (M), (M1), and (M2)
Zoning Changes—Alternative 2

 Potential Expansion
Areas, Alternative 2

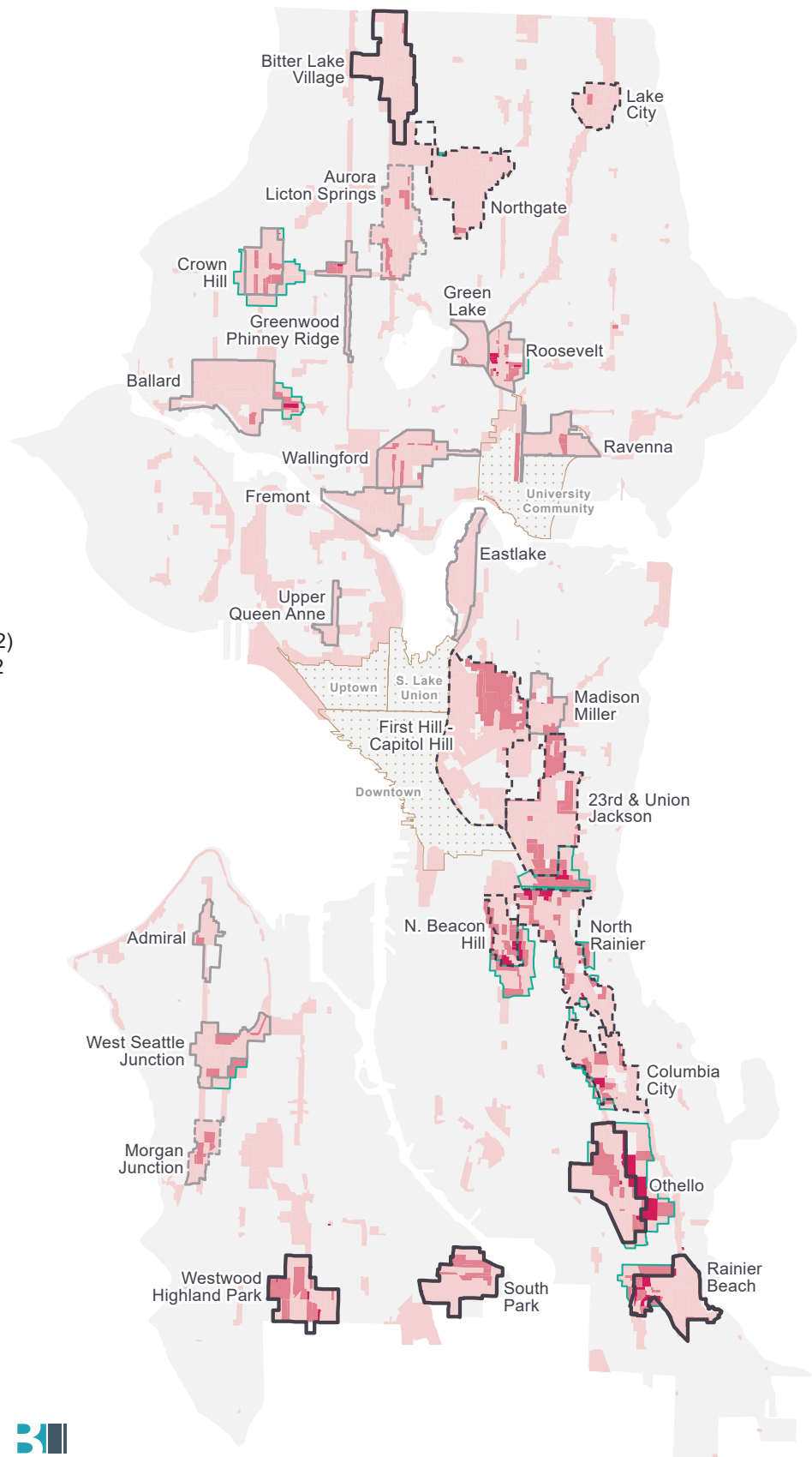
**Urban Centers/Villages,
Displacement Risk and
Access to Opportunity**

-  High Risk, Low Access
-  High Risk, High Access
-  Low Risk, High Access
-  Low Risk, Low Access
-  Outside MHA Study Area

MHA Tier

-  (M)
-  (M1)
-  (M2)

Source: City of Seattle, 2017; BERK, 2017.



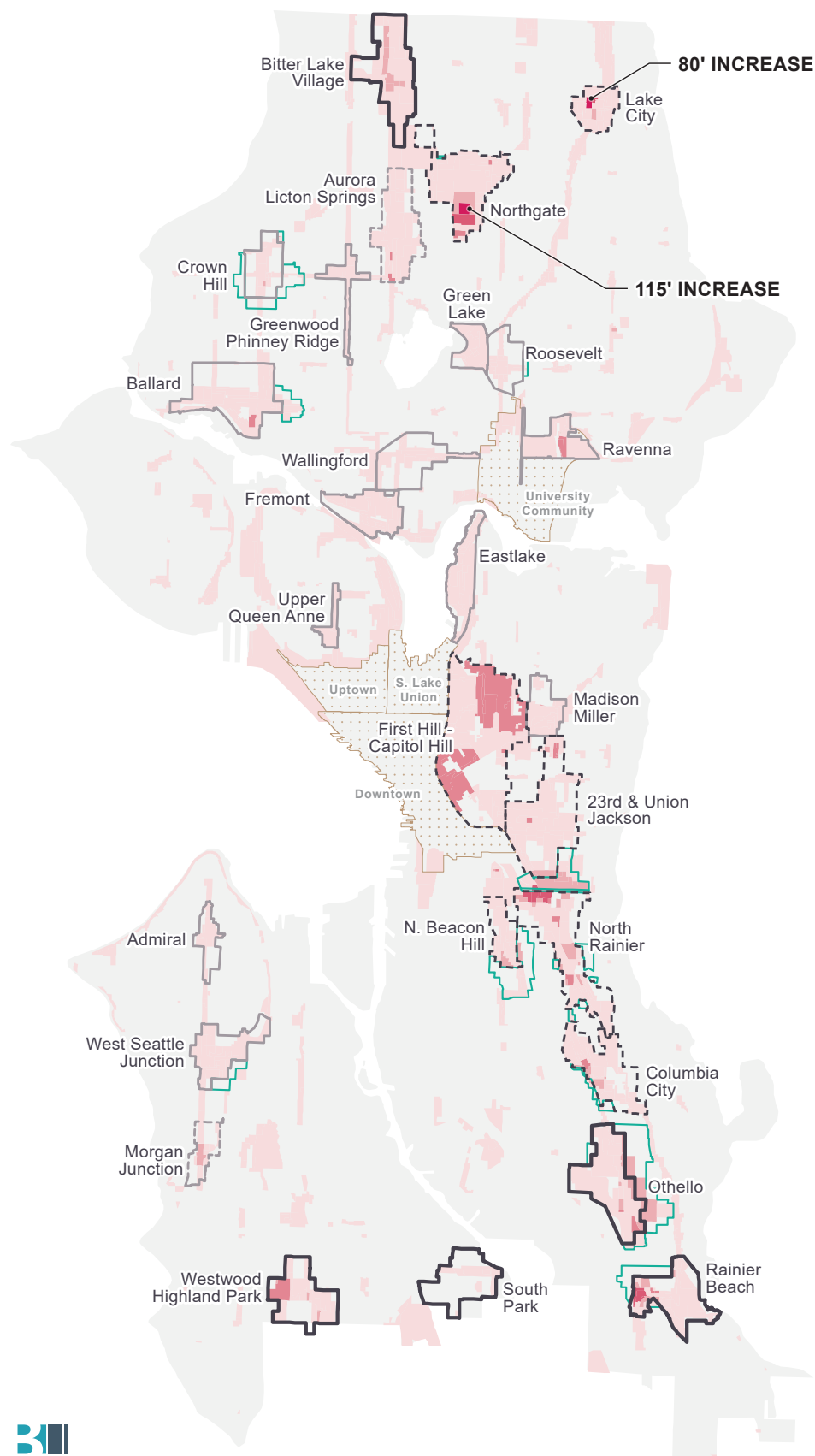
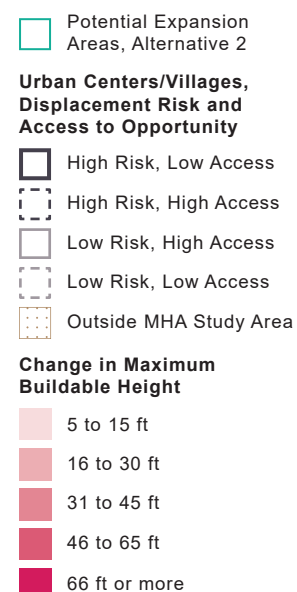


Exhibit 3.3–24
MHA Height Limit
Changes—Alternative 2



Source: City of Seattle, 2017; BERK, 2017.

Other areas with height increases of three or more stories include North Rainier near the future light rail station, Westwood–Highland Park on the site of the Westwood Village shopping mall, and Rainier Beach adjacent to the light rail station.

Compared to Alternative 3, Alternative 2 distributes the greatest building height increases primarily to urban villages that are already densely developed, such as First Hill–Capitol Hill, Lake City, and Northgate, though height increases beyond 30 feet would also occur in small areas of North Rainier and Rainier Beach. Accordingly, Alternative 2 includes height increases of greater magnitude than Alternative 3, but they occur in a smaller area.

Concentrating large height increases in this small number of locations limits the geographic extent of impacts related to the presence of taller buildings, but results in large localized changes in height, bulk, and scale. Applying design standards and other mitigation measures could limit the effects of these height increases. In areas with very large height increases, such as Northgate and Lake City, the Design Review process can mitigate potential scale and aesthetic impacts on surrounding development.

Urban Village Expansion Areas

As described under Impacts Common to All Alternatives, proposed expansion of urban villages would introduce increased height and bulk as lower-intensity development transitions to the higher-intensity building types typical of urban villages. Alternative 2 features larger expansions of certain urban villages than Alternative 3, thereby extending these aesthetic impacts across a larger area. Some of the largest urban village expansion areas are Crown Hill, North Rainier, North Beacon Hill, and Othello. Othello, North Beacon Hill, and North Rainier are all classified as having a high risk of displacement; larger urban village expansions in these locations could potentially accelerate changes in land use and building type.

View Obstruction and Shading Effects

As described above, Alternative 2 distributes the greatest building height increases to densely developed urban villages, where development intensity and building height are already high. These height increases are greater in magnitude than Alternative 3, occur in a smaller area, and are more likely to result in significant localized shading of adjacent properties or obstruction of protected views. The precise nature and degree of

potential impacts in these locations would depend on site-specific site characteristics and the designs of individual construction projects. As applicable, project-level design review during the permit application process would include evaluation of views and shading impacts, and provide an opportunity to define site-specific mitigation.

IMPACTS OF ALTERNATIVE 3

Like Alternative 2, Alternative 3 would implement MHA, directing most future growth to urban villages, primarily to areas currently zoned for commercial and multifamily development. Alternative 3 also includes explicit consideration of each urban village's classification in the displacement risk and access to opportunity typology. Alternative 3 would expand certain urban villages to approximate a mix of 10-minute and 5-minute walksheds from frequent transit service nodes, with the extent expansion area based on the urban village's classification in the displacement risk and access to opportunity typology.

Development Character, Height, and Scale

Impacts to development character, height, and scale under Alternative 3 would resemble those described under Impacts Common to All Alternatives. The following sections describe the distribution of those impacts across the study area under Alternative 3.

(M), (M1), and (M2) Zoning Changes

Exhibit 3.3–25 shows the extent and distribution of (M), (M1), and (M2) Tier rezones in the study area under Alternative 3. As described in Chapter 2, (M) zoning changes cover the largest portion of the study area: 77 percent of all lands proposed for MHA. (M1) and (M2) Tier rezones are concentrated in localized areas. In Alternative 2, 20 percent of lands proposed for MHA have (M1) zoning changes and only three percent (M2). As described under Impacts Common to All Alternatives, (M1) and (M2) zoning changes generally represent greater changes to building character, bulk and scale than (M) zoning changes due to changes in allowed building types.

(M2) Zoning Changes. In Alternative 3 (M2) zoning changes are concentrated in Fremont, Wallingford, Ballard, Roosevelt, Crown Hill, West Seattle Junction, Admiral, and Morgan Junction. The largest contiguous areas of (M2) zoning is in Roosevelt, Wallingford, and Fremont. (M2) zoning in Wallingford and Fremont is primarily between Aurora Ave N and Stone Way N, along streets including Midvale Ave

N and Woodland Park Ave N. A mix of existing single-family and small multifamily buildings characterize these areas, and MHA implementation could result in construction of larger multifamily structures and different buildings types. Morgan Junction would also have this condition under Alternative 3.

In Alternative 3 many of the larger areas of (M2) zoning occur where displacement risk is low and access to opportunity is high. Therefore, compared to Alternative 2, more of the localized aesthetic impacts associated with (M2) zoning changes would occur in areas with low displacement risk and high access to opportunity. Fewer areas of localized (M2) aesthetic impacts and changes to character would occur in areas with high displacement risk and low access to opportunity areas, particularly the urban villages in southeast Seattle. (See also Chapter 2).

(M1) Zoning Changes. Under Alternative 3, several of the largest areas of (M1) zoning changes are in urban villages north of the Ship Canal, including Crown Hill, Wallingford, Fremont, Ballard, Roosevelt, Green Lake, and in West Seattle Junction, Morgan Junction, and Admiral in West Seattle. Many (M1) areas are instances Single Family zones in urban villages or expansion areas that would change to allow multifamily housing. In Alternative 3 many of the larger areas of (M1) increases are also in areas with low displacement risk and high access to opportunity. Therefore, compared to Alternative 2, more of the localized aesthetic impacts associated with (M1) would occur where displacement risk is low and access to opportunity is high. Fewer (M1) aesthetic impacts and changes to character would occur in areas with high displacement risk and low opportunity areas. (See also Chapter 2).

Alternative 3 also features substantial (M1) and (M2) areas in the study area's two urban villages with low displacement risk and low access to opportunity: Morgan Junction and Aurora–Licton Springs. These urban villages would experience greater aesthetic impacts under Alternative 3 compared to Alternative 2.

Height Increases

Exhibit 3.3–26 shows the distribution of height increases in the study area due to zoning changes and Land Use Code amendments under Alternative 3. The greatest increases in allowed building height would occur in Crown Hill, Aurora–Licton Springs, Green Lake, Fremont, Eastlake, First Hill–Capitol Hill, Admiral, and Morgan Junction. Overall, height limit increases would be lower under Alternative 3 than under

Alternative 2; the greatest height increase under Alternative 3 would be 65 feet, compared with 115 feet under Alternative 2.

In contrast to Alternative 2, Alternative 3 does not include major building height increases in several localized areas. Also unlike Alternative 2, the urban villages receiving the greatest height increases have generally lower risk of displacement than those affected under Alternative 2. Crown Hill, Green Lake, Fremont, Eastlake, and Admiral are classified as having low displacement risk and high access to opportunity; First Hill–Capitol Hill is classified as an area with high displacement risk and high access to opportunity; and Aurora–Licton Springs has low displacement risk and low access to opportunity.

Urban Village Expansion Areas

As described under Impacts Common to All Alternatives, expansion of urban villages would introduce increased height and bulk and different building forms in single family areas, as lower-intensity development transitions to higher-intensity building types typical of urban villages. Alternative 3 would expand certain urban villages to reflect a mix of 5- and 10-minute walksheds around frequent transit. As described in Chapter 2, urban villages classified as having a high risk of displacement would have expansion areas consistent with 5-minute walksheds from transit nodes; urban villages classified as having low risk of displacement would have full 10-minute walkshed expansion areas. As a result, Alternative 3 would extend the aesthetic impacts of urban village expansion to a smaller area than Alternative 2.

View Obstruction and Shading Effects

As described above, Alternative 3 distributes moderate building height increases across the urban villages of the study area, and avoids a few very large height increases in the concentrated areas as seen in Alternative 2. The precise nature and degree of potential impacts in locations with height increases would depend on specific site characteristics and the designs of individual construction projects. As applicable, project-level design review during the permit application process would include evaluations of views and shading impacts and provide an opportunity to define site-specific mitigation.

Exhibit 3.3–25
Locations of (M), (M1), and (M2)
Zoning Changes—Alternative 3

Potential Expansion
Areas, Alternative 3

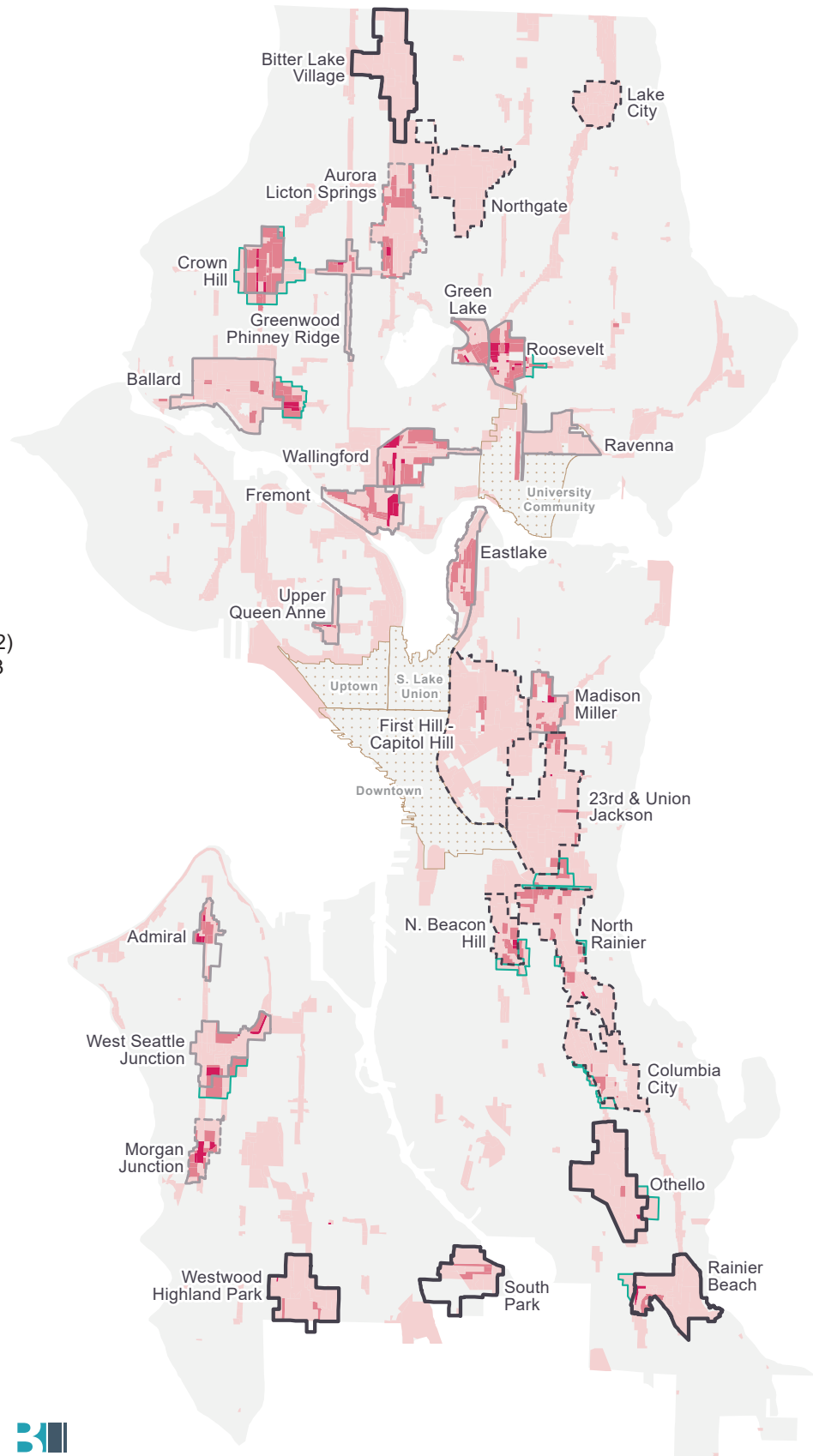
**Urban Centers/Villages,
Displacement Risk and
Access to Opportunity**

- High Risk, Low Access
- High Risk, High Access
- Low Risk, High Access
- Low Risk, Low Access
- Outside MHA Study Area

MHA Tier

- (M)
- (M1)
- (M2)

Source: City of Seattle, 2017; BERK, 2017.



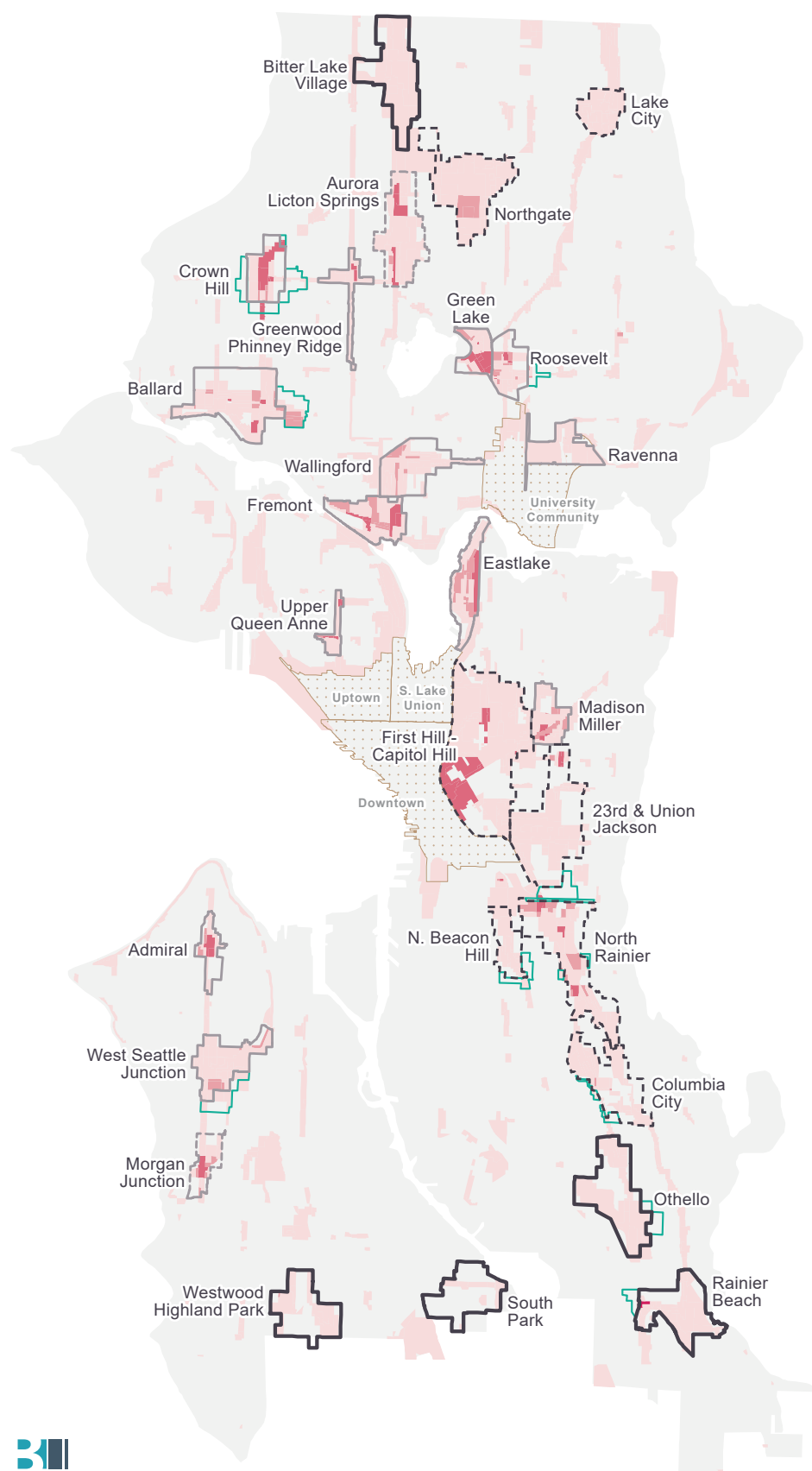


Exhibit 3.3–26
MHA Height Limit
Changes—Alternative 3

Potential Expansion
Areas, Alternative 3

**Urban Centers/Villages,
Displacement Risk and
Access to Opportunity**

- High Risk, Low Access
- High Risk, High Access
- Low Risk, High Access
- Low Risk, Low Access
- Outside MHA Study Area

**Change in Maximum
Buildable Height**

- 5 to 15 ft
- 16 to 30 ft
- 31 to 45 ft
- 46 to 65 ft

Source: City of Seattle, 2017; BERK, 2017.

New to the FEIS

Impacts of the Preferred Alternative, including Exhibit 3.3–27, Exhibit 3.3–28, Exhibit 3.3–29, and Exhibit 3.3–30, is a new section since issuance of the DEIS

IMPACTS OF THE PREFERRED ALTERNATIVE

The Preferred Alternative would implement MHA, directing most future growth to urban villages, primarily to areas currently zoned for commercial and multifamily development. Like Alternative 3, the Preferred Alternative would implement MHA with distinctions for each urban village's classification in the displacement risk and access to opportunity typology and would focus development capacity increases in areas with access to high-frequency transit service. As described in Chapter 2, the Preferred Alternative would include urban village expansion areas that approximate a 10-minute walkshed from frequent transit service nodes.

Development Character, Height, and Scale

Impacts to development character, height, and scale under the Preferred Alternative would resemble those described under Impacts Common to All Alternatives, with some exceptions. The Preferred Alternative would implement some additional revisions to the land use code, specifically in the Highrise Residential (HR) zone, and the Residential Small Lot (RSL) zone.

In the Preferred Alternative, development standards in the HR zone would:

- Increase height limit in the HR zone from 300 feet to 440 feet;
- Remove the tiered FAR limit in the HR zone; and
- Increase the maximum FAR in the HR zone from 14 to 15, the same amount as under Alternative 2 and 3 in the DEIS.

In the Preferred Alternative, development standards in the RSL zone would:

- Establish a new maximum dwelling unit size for any single dwelling unit, including any floor area in an attached accessory dwelling unit of 2,200 square feet;
- Establish a new tree planting requirement for new development.

These changes to the land use code would result in different impacts in the HR zone and RSL zone under the Preferred Alternative compared to Alternatives 2 or 3.

The following sections describe the distribution of aesthetic impacts across the study area under the Preferred Alternative.

(M), (M1), and (M2) Zoning Changes

Exhibit 3.3–27 shows the extent and distribution of (M), (M1), and (M2) Tier rezones in the study area under the Preferred Alternative. As described in Chapter 2, (M) zoning changes cover the largest portion

of the study area: 78 percent of all lands proposed for MHA. (M1) and (M2) Tier rezones are concentrated in localized areas, specifically in urban villages served by high-frequency transit. Under the Preferred Alternative, 20 percent of lands proposed for MHA rezones would have (M1) zoning changes, similar to Alternative 3, and only about one percent of land proposed for MHA rezones would experience (M2) tier rezones, which is the lowest of any of the action alternatives.

(M2) Zoning Changes. Under the Preferred Alternative, the largest concentrations of (M2) zoning would occur in Roosevelt, North Beacon Hill, Wallingford, Morgan Junction, and Admiral. Smaller areas of (M2) zoning would also be present in the northern portion of North Rainier near the future I-90 light rail station, in Othello and Rainier Beach along the MLK Boulevard transit corridor, in Eastlake along Eastlake Ave E, in Greenwood near Greenwood Ave N and NW 85th St, and in the northwest portion of Madison-Miller along 19th Ave E. As with the other action alternatives, a mix of existing single-family, multifamily, and neighborhood-scale commercial buildings characterize these areas, and MHA implementation could result in construction of larger multifamily structures and different buildings types.

Similar to Alternative 3, the Preferred Alternative is designed to concentrate most areas of (M2) zoning where displacement risk is low and access to opportunity is high. In urban villages where displacement risk is higher, (M2) zoning is concentrated within a 5-minute walk of a major transit node.

(M1) Zoning Changes. Similar to Alternative 3, several of the largest areas of (M1) zoning changes are in urban villages north of the Ship Canal, including Crown Hill, Wallingford, Fremont, Roosevelt, and Aurora-Licton Springs. Substantial (M1) rezoning would also occur in West Seattle Junction, Westwood-Highland Park, Columbia City, North Beacon Hill, and First Hill-Capitol Hill. Approximately 48 percent of (M1) zoning would occur in areas with low risk of displacement and high access to opportunity; this amount is 1 percent greater than Alternative 3 and 27 percent greater than Alternative 2.

The Preferred Alternative also proposes substantial (M1) areas in the study area's two urban villages with low displacement risk and low access to opportunity: Morgan Junction and Aurora-Licton Springs, though a lesser amount than Alternative 3. These urban villages would experience more extensive aesthetic change under the Preferred Alternative than under Alternative 2, but less than under Alternative 3.

Exhibit 3.3–27
Locations of (M), (M1), and
(M2) Zoning Changes—
Preferred Alternative

Potential Expansion
Areas, Preferred Alt.

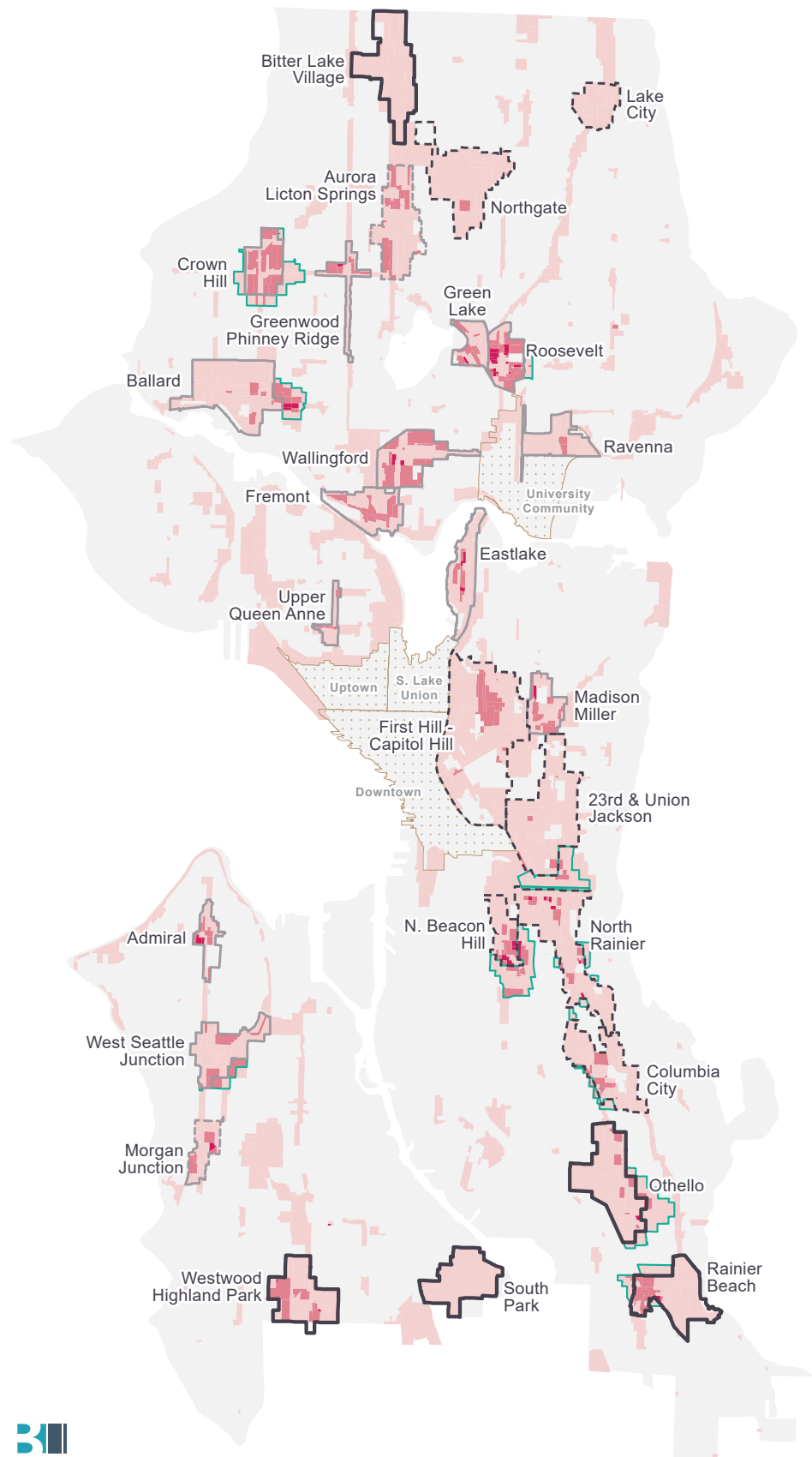
**Urban Centers/Villages,
Displacement Risk and
Access to Opportunity**

- High Risk, Low Access
- High Risk, High Access
- Low Risk, High Access
- Low Risk, Low Access
- Outside MHA Study Area

MHA Tier

- (M)
- (M1)
- (M2)

Source: City of Seattle, 2017; BERK,
2017.



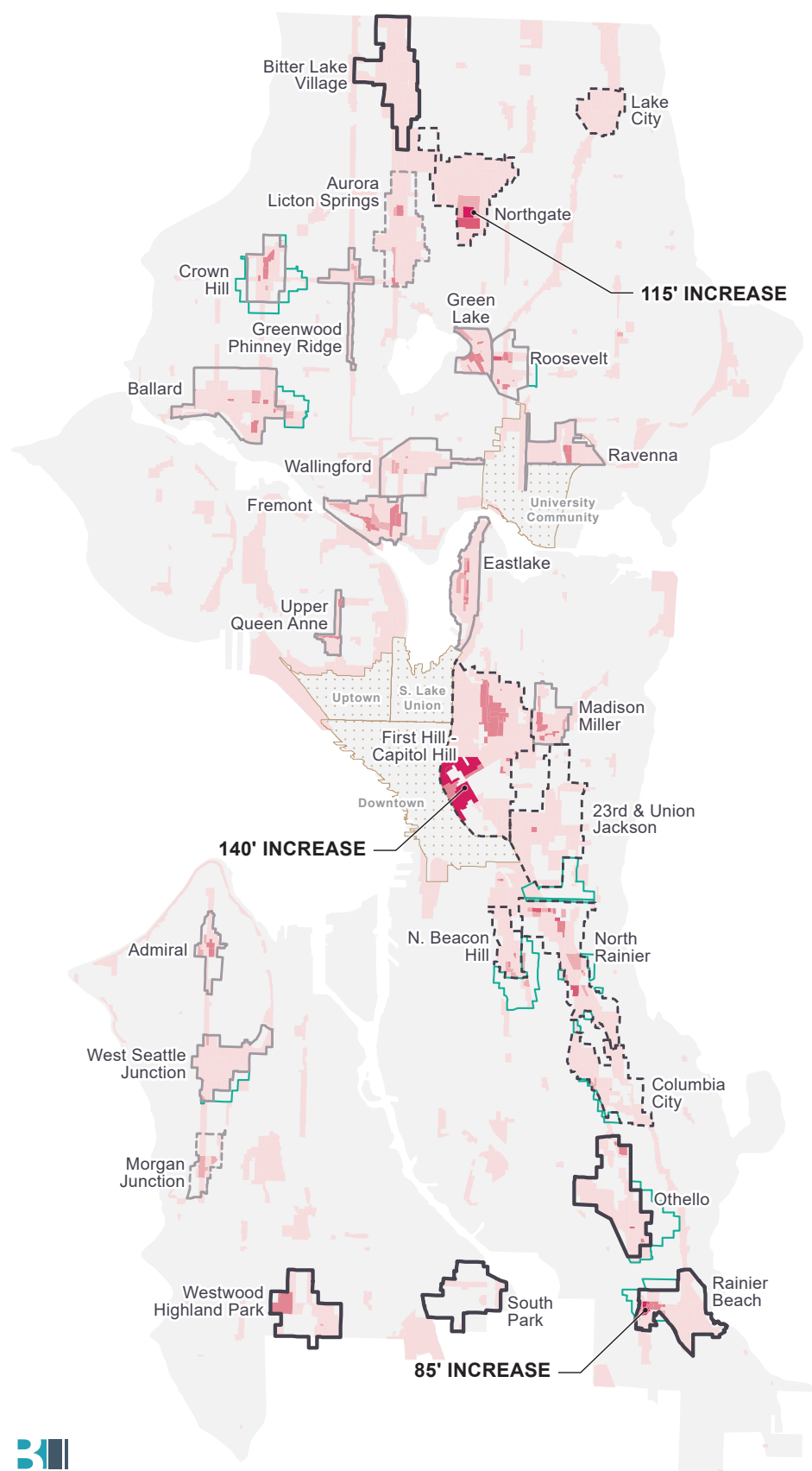


Exhibit 3.3–28
MHA Height Limit Changes—
Preferred Alternative

Potential Expansion
Areas, Preferred Alt.

**Urban Centers/Villages,
Displacement Risk and
Access to Opportunity**

- High Risk, Low Access
- High Risk, High Access
- Low Risk, High Access
- Low Risk, Low Access
- Outside MHA Study Area

**Change in Maximum
Buildable Height**

- 5 to 15 ft
- 16 to 30 ft
- 31 to 45 ft
- 46 to 65 ft
- 66 ft or more

Source: City of Seattle, 2017; BERK, 2017.

Height Increases

Exhibit 3.3–28 shows the distribution of height increases in the study area due to zoning changes and Land Use Code amendments under the Preferred Alternative. The greatest increases in allowed building height would occur in First Hill-Capitol Hill, Northgate, and Rainier Beach. Overall, greater increases in height limits would be concentrated in fewer locations compared to Alternatives 2 or 3, though the magnitude of these concentrated increases would be greater. The greatest height increases under the Preferred Alternative would be 140 feet (First Hill), 115 feet (Northgate) and 85 feet (Rainier Beach); the greatest height increases under Alternatives 2 and 3 would be 115 feet and 65 feet, respectively.

While these height increases are substantial, concentrating them in fewer locations would localize the impacts and allow for reduced height increases across the other urban villages. The locations targeted for large height increases under the Preferred Alternative are planned to be or are currently served by high-frequency transit. However, two of the most affected villages (Northgate and First Hill) are classified as having high risk of displacement and high access to opportunity. The third, Rainier Beach, is classified as having high displacement risk and low access to opportunity. The Preferred Alternative, however, would also create two new zones: Seattle Mixed—Northgate (SM-NG) and Seattle Mixed—Rainier Beach (SM-RB). Both of these new zones would include development regulations that encourage development near light rail to incorporate features identified as high priority during local community planning efforts in these areas.

The largest proposed height increase under the Preferred Alternative is associated with additional land use code changes proposed to the HR zone, described at the beginning of this section. The Preferred Alternative would increase the maximum height in the HR zone from 300 feet to 440 feet, 100 feet taller than would be allowed under Alternative 2 or Alternative 3, and would increase the maximum FAR from 14 to 15, which is the same FAR increase as Alternative 2 and 3. As described in Impacts Common to All Alternatives, increased building height can lead to significant aesthetic impacts on adjacent development and neighborhood character. Exhibit 3.3–29 and Exhibit 3.3–30 show examples of potential infill development in the Highrise multifamily (HR) zone under the standards proposed in the Preferred Alternative.

The First Hill urban village is currently the only area where the HR zone is applied, and would therefore also be the only location where MHA

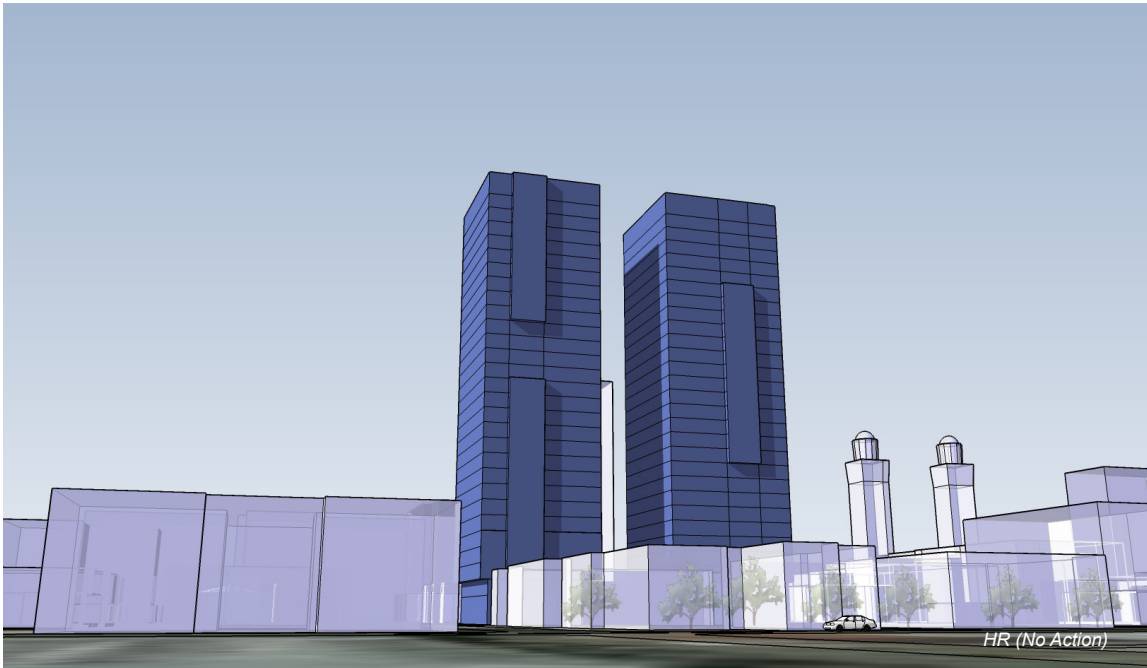


Exhibit 3.3–29
Highrise Residential
Zoning, No Action

Source: City of Seattle, 2017.

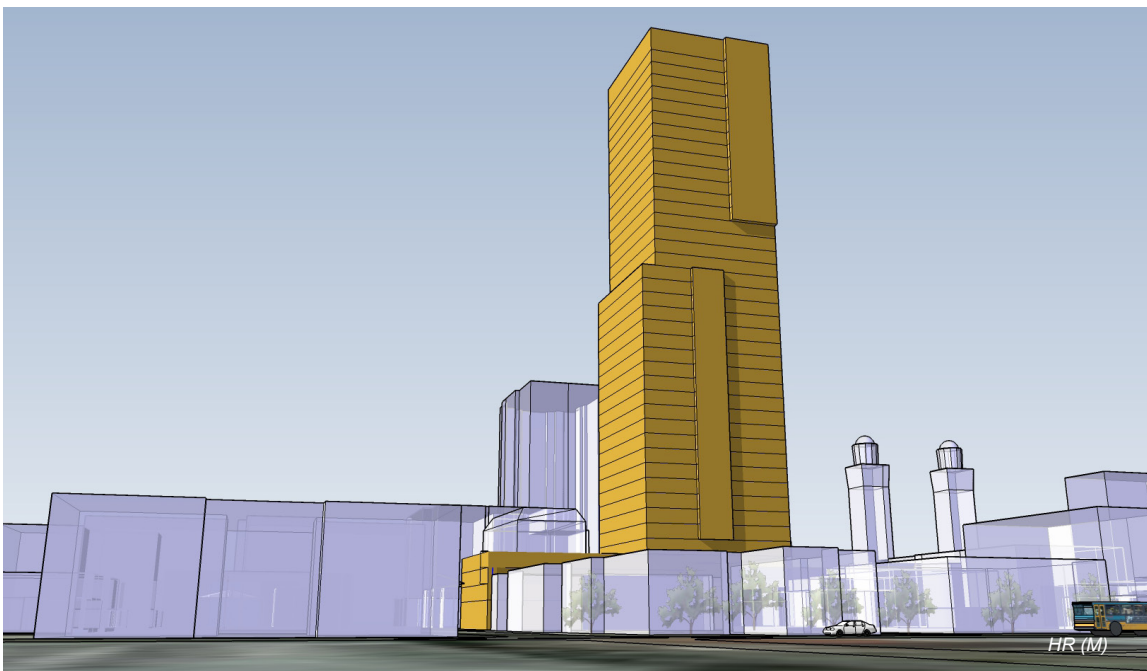


Exhibit 3.3–30
Highrise Residential
(M) Infill Development

Source: City of Seattle, 2017.

Relevant urban villages include:

First Hill-Capitol Hill.

implementation in the HR zone would have an effect. Exhibit 3.3–29 shows potential infill development under existing regulations on a typical half-block site in First Hill, which would likely yield a two-tower development to maximize allowable floor area under the existing FAR limit of 14.0 and the current height limit of 300 feet. The two towers would be 28-stories/-300-foot tall towers on a single podium structure. Proposed MHA implementation under the Preferred Alternative would increase the allowed FAR in the MHA zone to 15, and increase the allowed height limit to 440 feet. The likely result, illustrated in Exhibit 3.3–30 would be a single 41-story tower that is 440 feet tall. Maximum floor plates under existing regulations are 12,000 square feet on average, compared to 10,000 square feet on average under the MHA Preferred Alternative scenario.

The Preferred Alternative would include several features to mitigate potential bulk and scale impacts resulting from increased heights in the HR zone. These include reduced limits on average and maximum floor plate sizes, which would result in more slender towers than under existing regulations. Proposed HR standards would also include a 60 percent limit on site coverage for portions of a structure over 45 feet in height. Maximum façade width for towers would also be reduced from 150 feet to 130 feet to reduce the bulk and scale of towers.

Residential Small Lot (RSL) Development Standards

Under the Preferred Alternative, the RSL zone would include new development standards applying a maximum 2,200 square-foot single dwelling unit size, and a new tree planting requirement. The expected aesthetic effect of the maximum dwelling unit size would be to produce more moderately sized single-unit structures than would occur in the zone without the limit. While it would still be possible for multiple units to be attached, resulting in buildings larger in total area than 2,200 square feet, it is expected that the development standard would reduce structure sizes for popular free-standing single-unit home structures compared to Alternative 2 and 3. The scale of such structures would be more consistent with a context of smaller-scale single family homes that are present in some areas the RSL zone would be implemented. The addition of a tree planting requirement on the site of RSL development would have the effect of providing more vegetative screening than would occur without the requirement. Due to these features, there are expected to be relatively fewer adverse aesthetic impacts in locations where the RSL zone is implemented under the Preferred Alternative compared to Alternative 2 or 3.

Urban Village Expansion Areas

As described under Impacts Common to All Alternatives, expansion of urban villages would introduce increased height and bulk and different building forms in existing single family areas, as lower-intensity development transitions to higher-intensity building types typical of urban villages. Alternative 3 would expand certain urban villages to reflect a mix of 5- and 10-minute walksheds around frequent transit. As described in Chapter 2, urban villages classified as having a high risk of displacement would have expansion areas consistent with 5-minute walksheds from transit nodes; urban villages classified as having low risk of displacement would have full 10-minute walkshed expansion areas. As a result, Alternative 3 would limit the aesthetic impacts of urban village expansion to a smaller area compared to Alternative 2.

View Obstruction and Shading Effects

Similar to the other action Alternatives, the precise nature and degree of potential impacts to protected views in locations with height increases would depend on specific site characteristics and the designs of individual construction projects. In addition, the increased heights allowed in the HR zone could significantly increase shading conditions on adjacent sites at certain times of day. However, the single tower structures promoted under the Preferred Alternative (Exhibit 3.3–30) could provide increased access to light and air due to the reduced bulk of a single tower compared with two towers. The single tower structure could also have equal or lesser impacts on view blockage from within other adjacent and nearby structures, because building mass would cover less of the site footprint at heights above the 45-foot podium. However, the increased height could have a greater impact on views in areas outside the immediate vicinity of the building. Taller structures are visible from greater distances, and the addition of 440-foot tall buildings in a hilltop area could alter the skyline composition, which would be perceptible from locations outside the First Hill neighborhood.

As applicable, project-level design review during the permit application process would include evaluations of views and shading impacts and provide an opportunity to define site-specific mitigation.

3.3.3 MITIGATION MEASURES

INCORPORATED PLAN FEATURES

The Action Alternatives include features intended to reduce the negative effects associated with increased development intensity, including the following proposed Land Use Code amendments:

- Requirements for upper-level setbacks in the amended Lowrise 2, Lowrise 3, Midrise, and Highrise zones;
- Requirements for upper-level setbacks in the new NC-55, NC-75, and NC-95 zones;
- Requirements for significant building modulation for building façades wider than 250 feet in Commercial and Neighborhood Commercial zones;
- Limiting building depth in MR zones to 80 percent of the lot depth;
- Implementation of side façade design standards in Lowrise 1, Lowrise 2, and Lowrise 3 zones—the standards would address the placement of windows on side façades to increase privacy and would require side façade modulation or color/material variation; ~~and~~
- Implementation of increased side and rear upper level setbacks in Neighborhood Commercial zones if adjacent to a residential zone;
- Modification of green factor landscaping requirements to place greater emphasis on ground-level landscaping and vegetation adjacent to public rights-of-way; and
- A lower design review threshold for a period of 5-years, to require design review for structures with 5,000 or more square feet, if the area is rezoned from single family.
- **Preferred Alternative:** Area-specific design standards within the new Seattle Mixed—Northgate (SM-NG) and Seattle Mixed—Rainier Beach (SM-RB) zones that are adjacent to existing or future light rail stations.
- **Preferred Alternative:** 2,200 square-foot maximum dwelling unit size limit in the RSL zone.
- **Preferred Alternative:** Tree planting requirement in the RSL zone using a point system that prioritizes preservation of existing trees and planting of large tree species.

REGULATIONS AND COMMITMENTS

- SMC 25.05.675.P establishes policies for the protection of public views, including views of major man-made and natural landmarks from specified public parks, viewpoints and scenic routes;
- SMC 25.05.675.Q establishes policies to protect open spaces from shading and shadow effects caused by development and preserve access to light and air; and
- Chapter 23.41 of the SMC establishes citywide requirements for Design Review.

OTHER POTENTIAL MITIGATION MEASURES

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

Development Character, Height, and Scale

- For high-rise tower-style development, locate the tallest portions of the building to reduce scale impacts relative to the most sensitive edges of the property. Applying lower height limits for the “pedestal” or “podium” portion of the building could 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 connections to break up the bulk of buildings and reduce the occurrence of monolithic building forms;
- Through the Design Review process, promote slimmer building forms that minimize blockage of light and views; and
- Through the Design Review process, include streetscape improvements to create a streetscape with universal design that is welcoming to pedestrians, cyclists, and all users of the public realm.

Modifications to Design Review

As discussed in 3.3.1 Affected Environment, design review is required for certain types of development according to codified thresholds. ~~Aesthetic impacts could be mitigated by modifying design review thresholds to require design review for more types of development in the study area in locations that would be impacted by the proposal. For example, design review could be required for new multi-family developments in areas rezoned from single family, and in urban village expansion areas. The~~ design review process improvements adopted by City Council in October

of 2017 are an integrated part of this proposal, and include measures specifically intended to mitigate potential aesthetic impacts of MHA implementation in areas rezoned from single family zones.

Neighborhood Design Guidelines

As discussed in 3.3.1 Affected Environment, some but not all urban villages that the proposal would affect have neighborhood design guidelines. Working with neighborhood groups to create and codify neighborhood design guidelines could mitigate localized aesthetic impacts for urban villages that do not currently have them.

View Obstruction and Shading Effects

- Citywide, require preservation or replacement of existing streetscape vegetation along designated scenic routes to preserve and/or improve visual character; and
- Through the design review and/or site-level SEPA review process for proposed projects, require detailed shading/shadow and view studies for new development in areas where the proposed MHA height limit increase is 30 feet or more to protect streetscapes and public open spaces from excessive shading.

3.3.4 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, including the conversion of lower-intensity uses to higher-intensity uses as allowed by zoning. This transition is an unavoidable and expected characteristic of urban population and employment growth. The Action Alternatives would further this trend by creating additional development capacity, which could accelerate the development of taller, more intense buildings in the study area.

However, as described in 3.3.3 Mitigation Measures, 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, and the mitigation measures recommended in this EIS, 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.

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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.

3.4



TRANSPORTATION.

This chapter presents a multimodal transportation analysis prepared to evaluate the potential impacts of implementing the range of land use alternatives under consideration. This chapter of the FEIS presents existing transportation conditions within the City of Seattle, as well as future transportation conditions under three alternatives as found in the Draft EIS (DEIS), plus updates and new information describing the Preferred Alternative. 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. ~~—one no action alternative representing a continuation of the City's adopted land use plan and two action alternatives reflecting increases in the amount of growth accommodated over the next twenty years as a result of the proposed legislation.~~ Significant transportation impacts and potential mitigation strategies are identified for each future action alternative based on the policies and recommendations established in local plans.

3.4.1 AFFECTED ENVIRONMENT

This section describes the existing transportation conditions in Seattle. Information is provided on a citywide basis as well as for eight defined areas (or "EIS analysis sectors") as shown in Exhibit 3.4–1 on the following page, including Northwest Seattle, Northeast Seattle, Queen Anne/Magnolia, Downtown/Lake Union, Capitol Hill/Central District, West Seattle, Duwamish and Southeast Seattle.

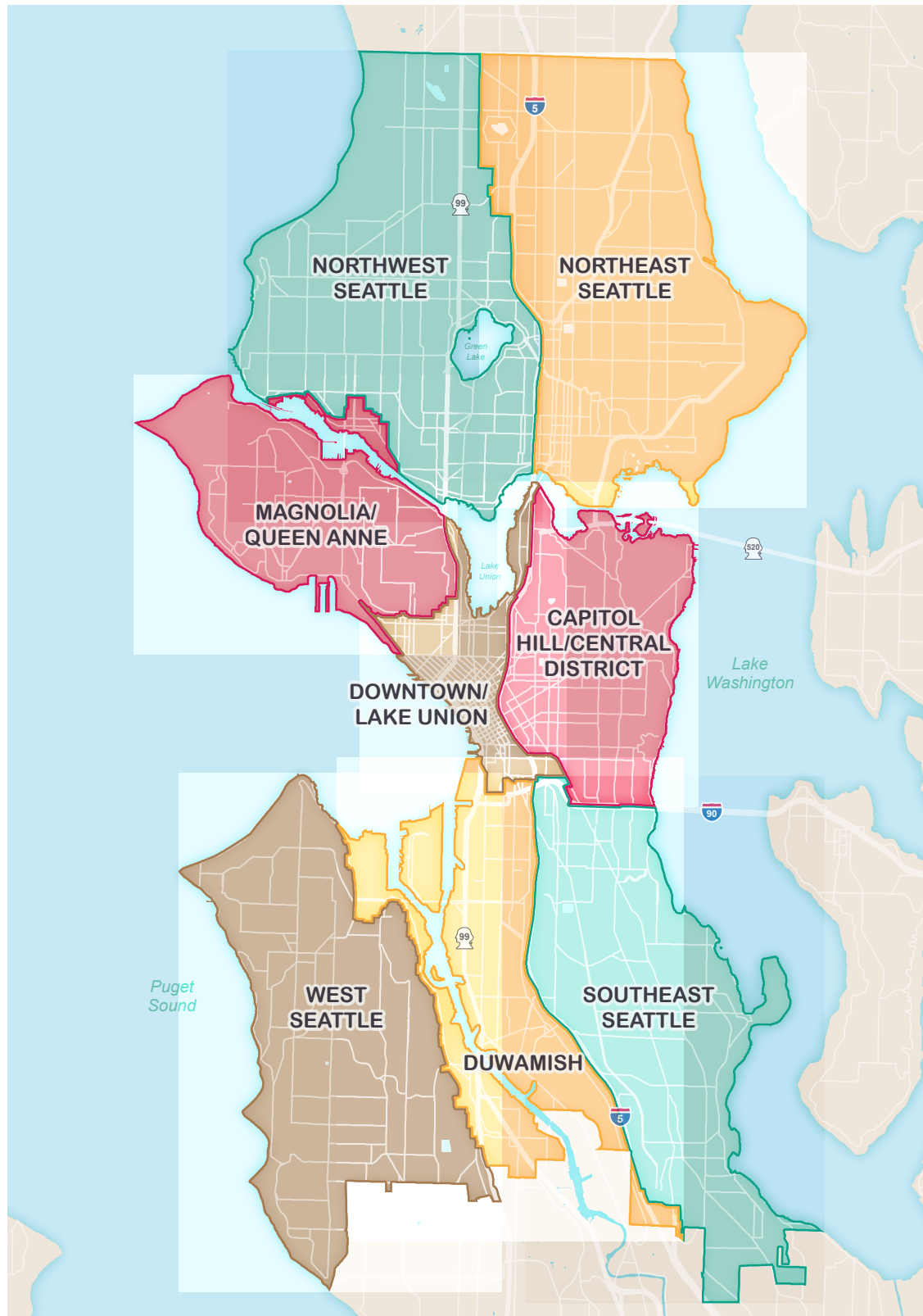


Exhibit 3.4–1 EIS Analysis Sectors

Source: City of Seattle, 2017; Fehr & Peers, 2017.

EXISTING TRANSPORTATION NETWORK

This section describes the existing transportation network in Seattle for all modes, including pedestrians, bicycles, transit, autos and freight.

Pedestrian Network

The Seattle pedestrian network is composed of sidewalks, crosswalks, staircases, pedestrian bridges, curb ramps and trails. Most urban centers and urban villages have well-connected sidewalk networks. The 2017 *Seattle Pedestrian Master Plan* (PMP) states that there are approximately 5,500 marked crosswalks, 33,600 blockfaces of sidewalks, and 27,300 curb ramps in Seattle (SDOT 2017a, 25). However, 26 percent of the blockfaces in the city are missing sidewalks (SDOT 2017a, 62). These locations are mostly found in the Northwest and Northeast Seattle sectors north of NE 85th Street, near the southwest city boundaries in the West Seattle Sector, in sections of the Duwamish Sector and the edges of the Southeast Seattle Sector.

The PMP designates a Priority Investment Network to prioritize the City's efforts on the locations most in need. The network is focused on key pedestrian connections to schools and frequent transit stops. Exhibit 3.4–2 through Exhibit 3.4–7 show the Priority Investment Network throughout the city. The City has made steady progress on pedestrian improvements through the Bridging the Gap levy. From 2007 to 2015, there have been 118 new blocks of sidewalk constructed, 122 curb ramps constructed, 50 stairways rehabilitated, 5,766 crosswalks remarked, and crossing improvements at 266 locations among other improvements (SDOT 2015, 6).

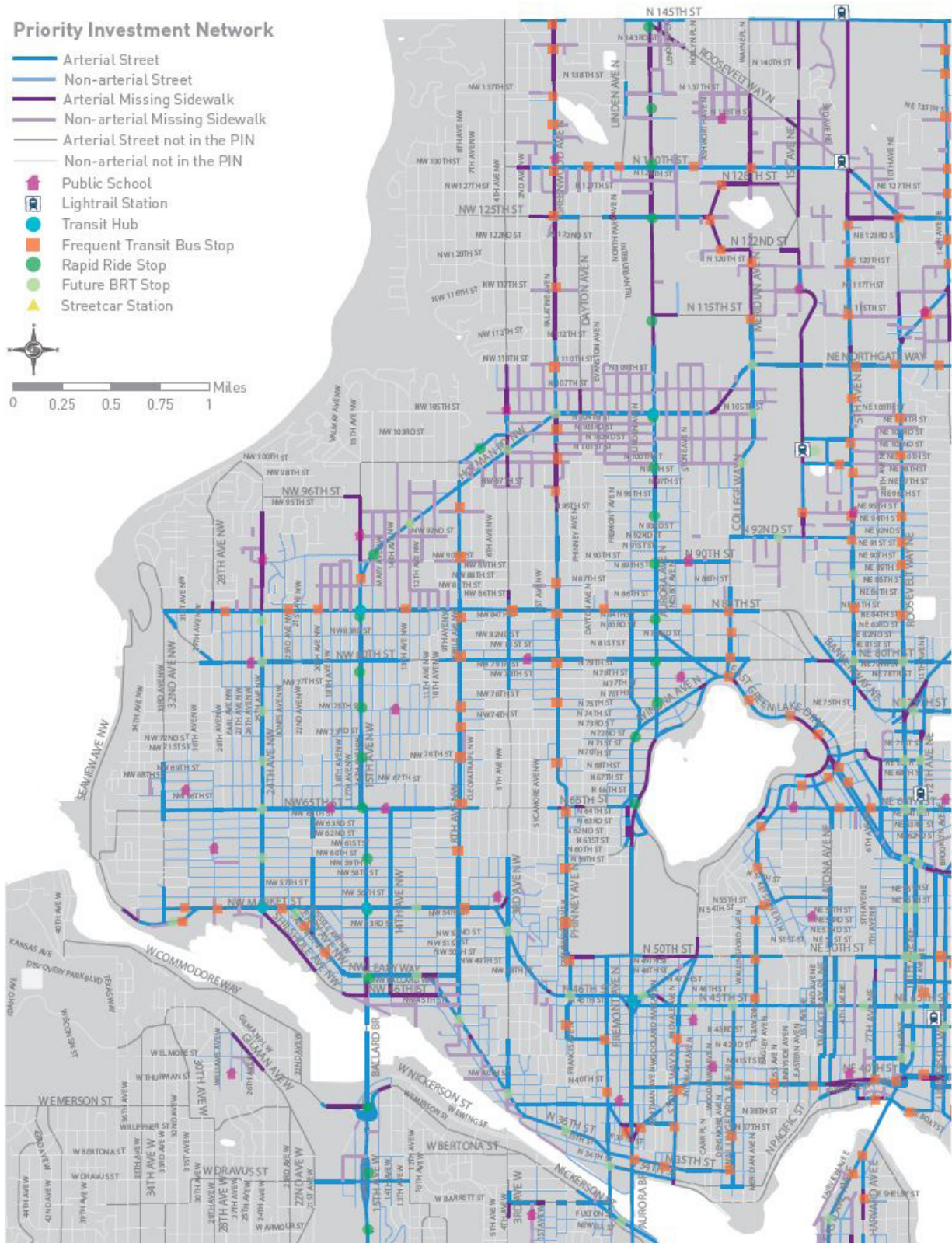


Exhibit 3.4-2 Pedestrian Master Plan Priority Investment Network, Northwest Seattle

Source: City of Seattle, 2017.

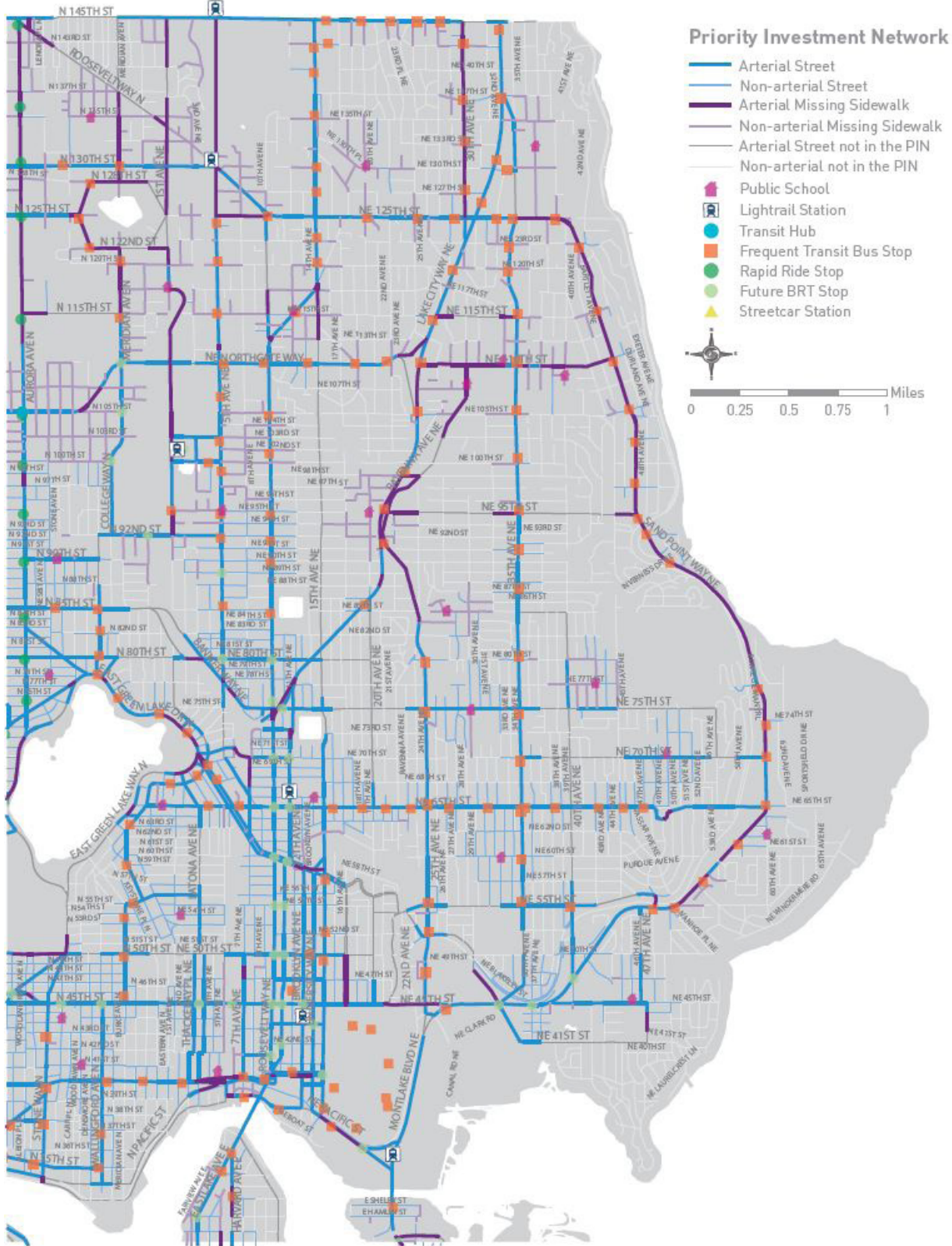


Exhibit 3.4–3 Pedestrian Master Plan Priority Investment Network, Northeast Seattle

Source: City of Seattle, 2017.

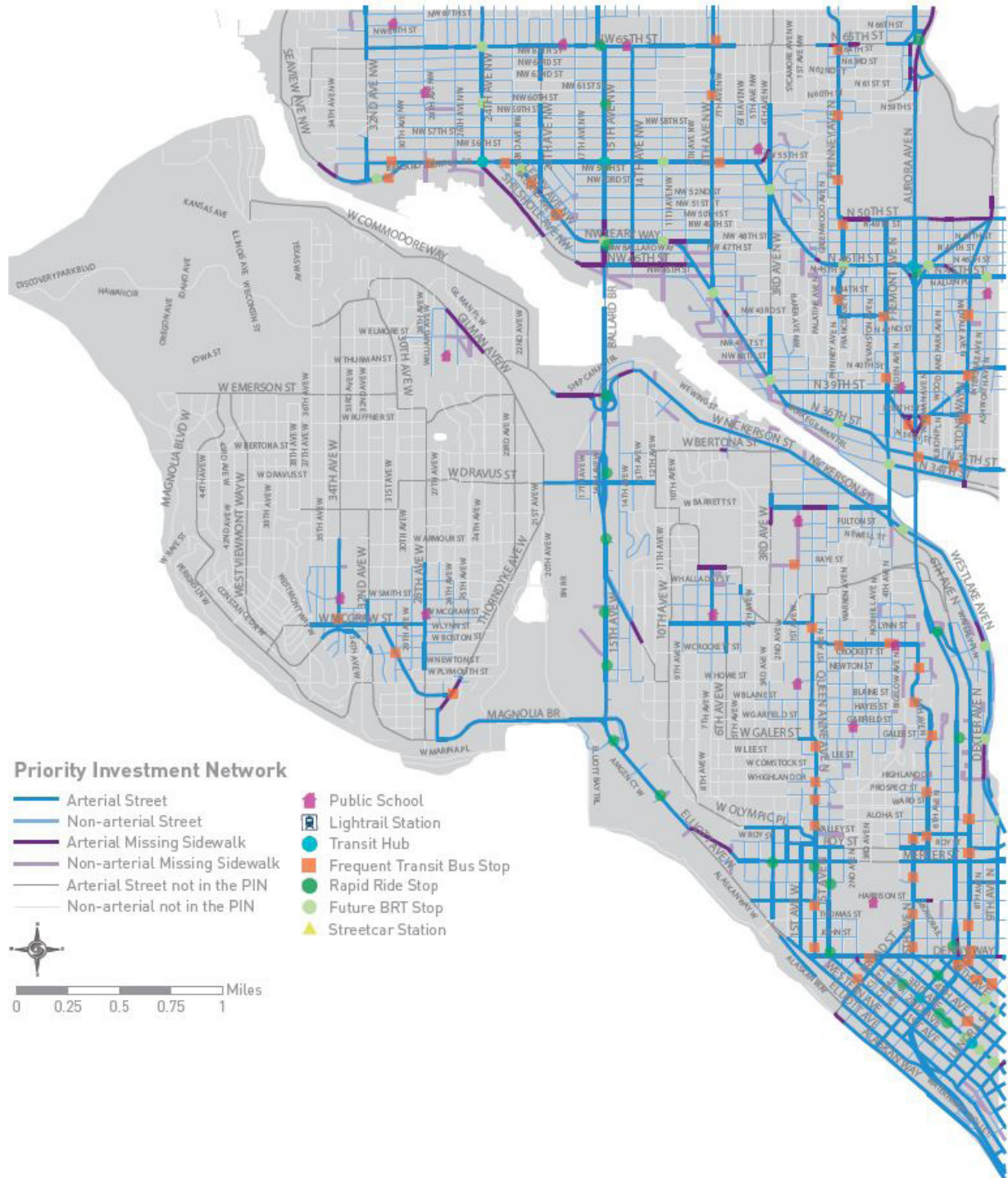


Exhibit 3.4-4 Pedestrian Master Plan Priority Investment Network, West Central Seattle

Source: City of Seattle, 2017.

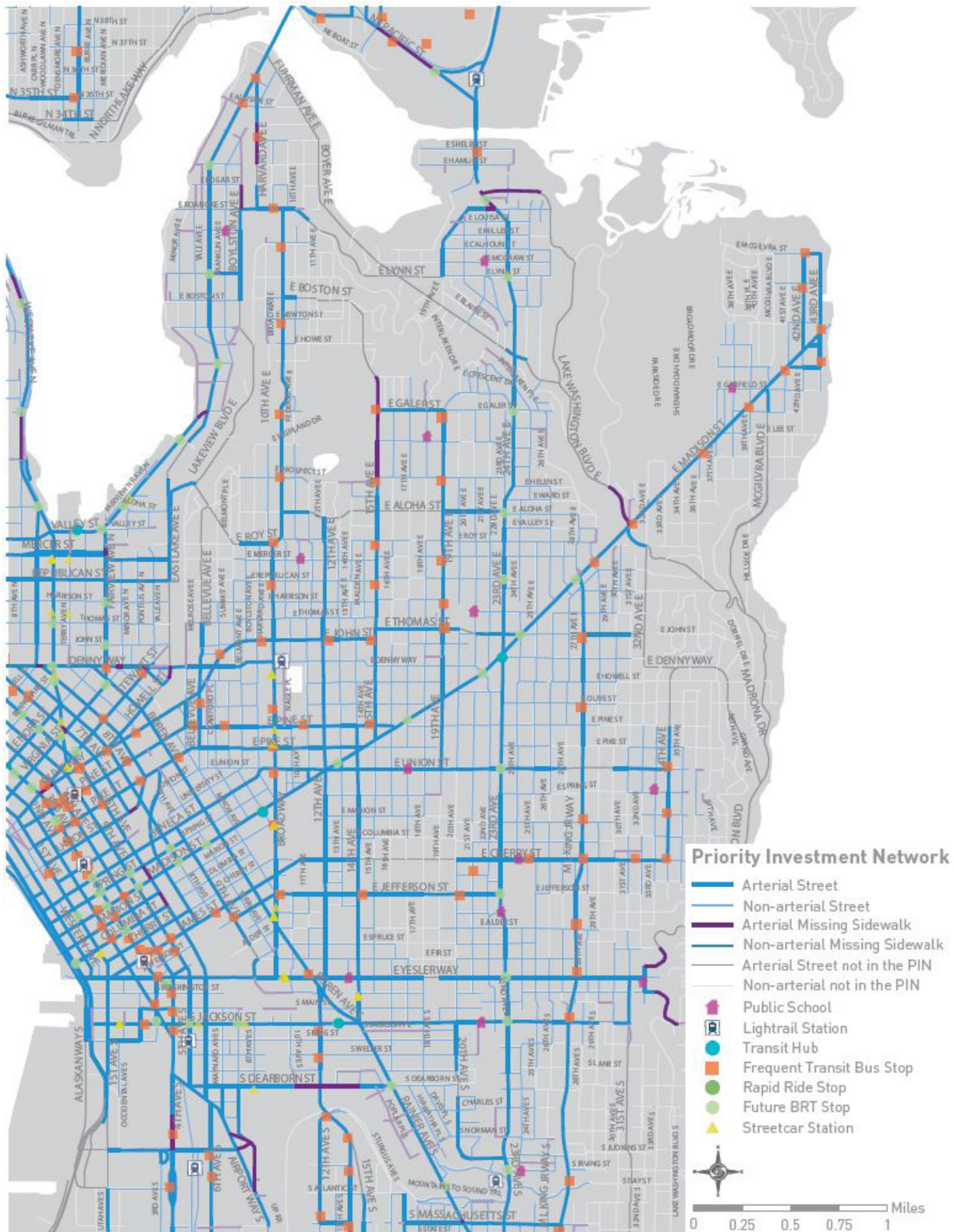


Exhibit 3.4–5 Pedestrian Master Plan Priority Investment Network, East Central Seattle

Source: City of Seattle, 2017.

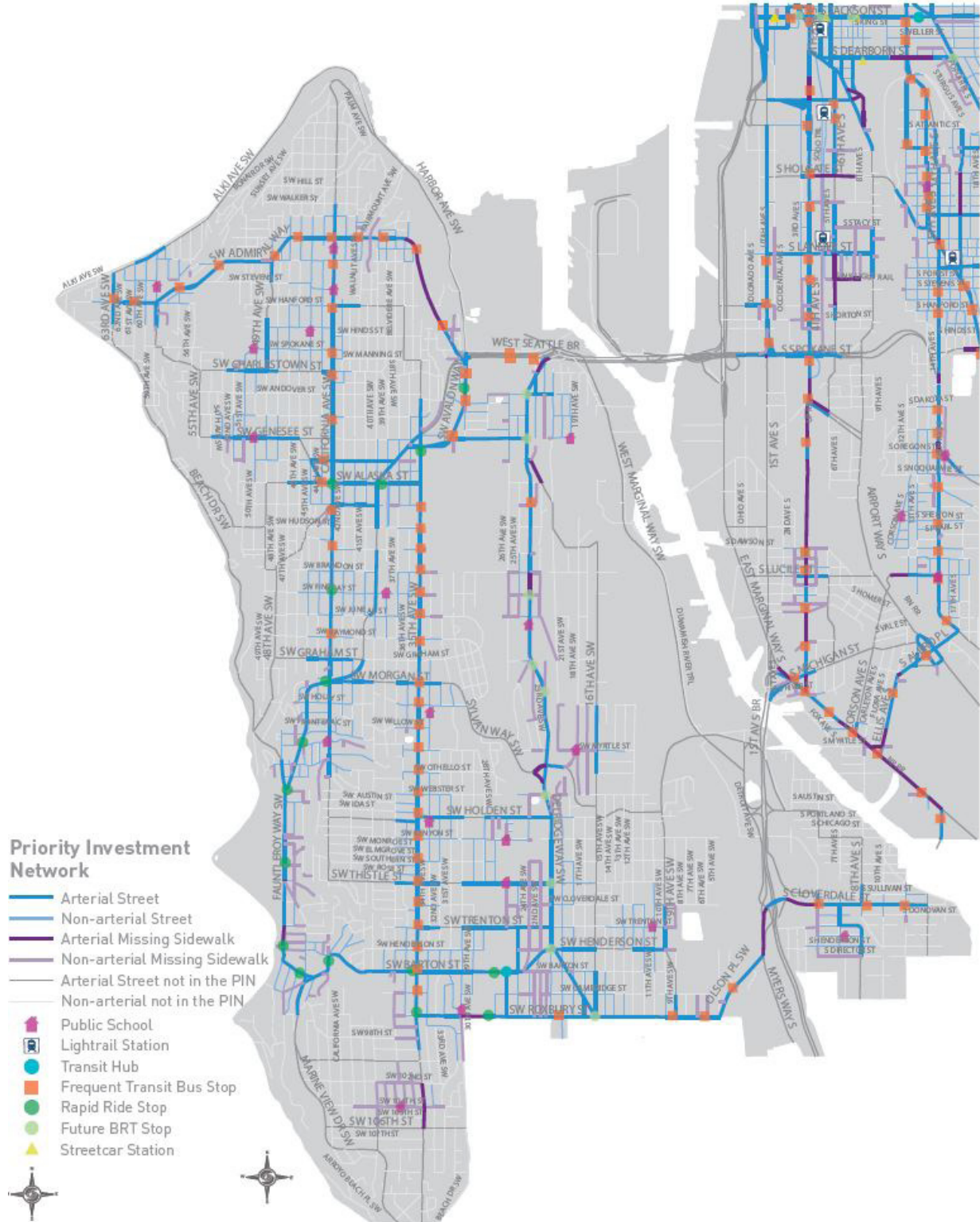


Exhibit 3.4-6 Pedestrian Master Plan Priority Investment Network, Southwest Seattle

Source: City of Seattle, 2017.

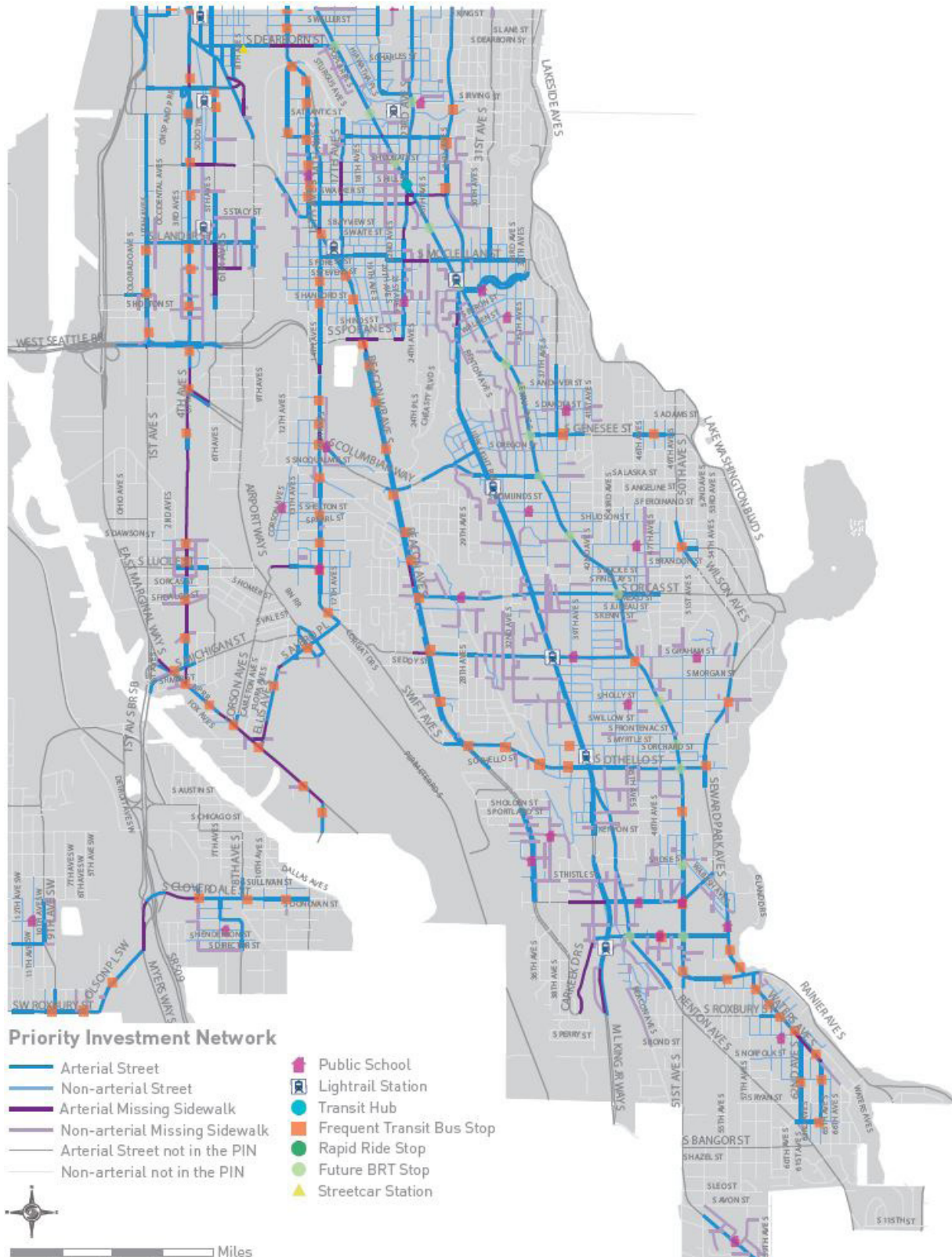


Exhibit 3.4-7 Pedestrian Master Plan Priority Investment Network, Southeast Seattle

Source: City of Seattle, 2017.

Bicycle Network

Seattle's bicycle facilities consist of off-street facilities such as multi-use trails, cycle tracks—protected bicycle lanes, physically separated (raised or with an on-street barrier), neighborhood greenways, bicycle and climbing lanes, shared street bicycle facilities or “sharrows”, and signed routes. Exhibit 3.4–88 shows existing bicycle facilities; the planned network is shown in Exhibit 3.4–9 through Exhibit 3.4–14.

Bicycle facilities are spread throughout the city and are more prevalent in urban centers such as Downtown, First/Capitol Hill, the University District, South Lake Union, and Uptown (also known as Lower Queen Anne). Trails are generally along the water (Lake Washington, Ship Canal, Puget Sound), while neighborhood greenways are in more residential locations of the Northwest, Northeast, Southeast and West Seattle sectors. Locations of gaps in the bicycle network are identified throughout Seattle in the *Bicycle Master Plan*, which recommends over 400 miles of new bicycle facilities and connections by 2030.

The City collects bicycle counts three times a year at 50 locations in Seattle. The highest bicycle count locations are at ship canal crossings, and in the South Lake Union, Capitol Hill, and the Downtown neighborhoods. Over the past six years, the data has generally shown steadily climbing numbers of bicycle riders, although the 2016 count showed a decline. However, this data is thought to be anomalous due to data errors and weather conditions on the days of the 2016 counts.

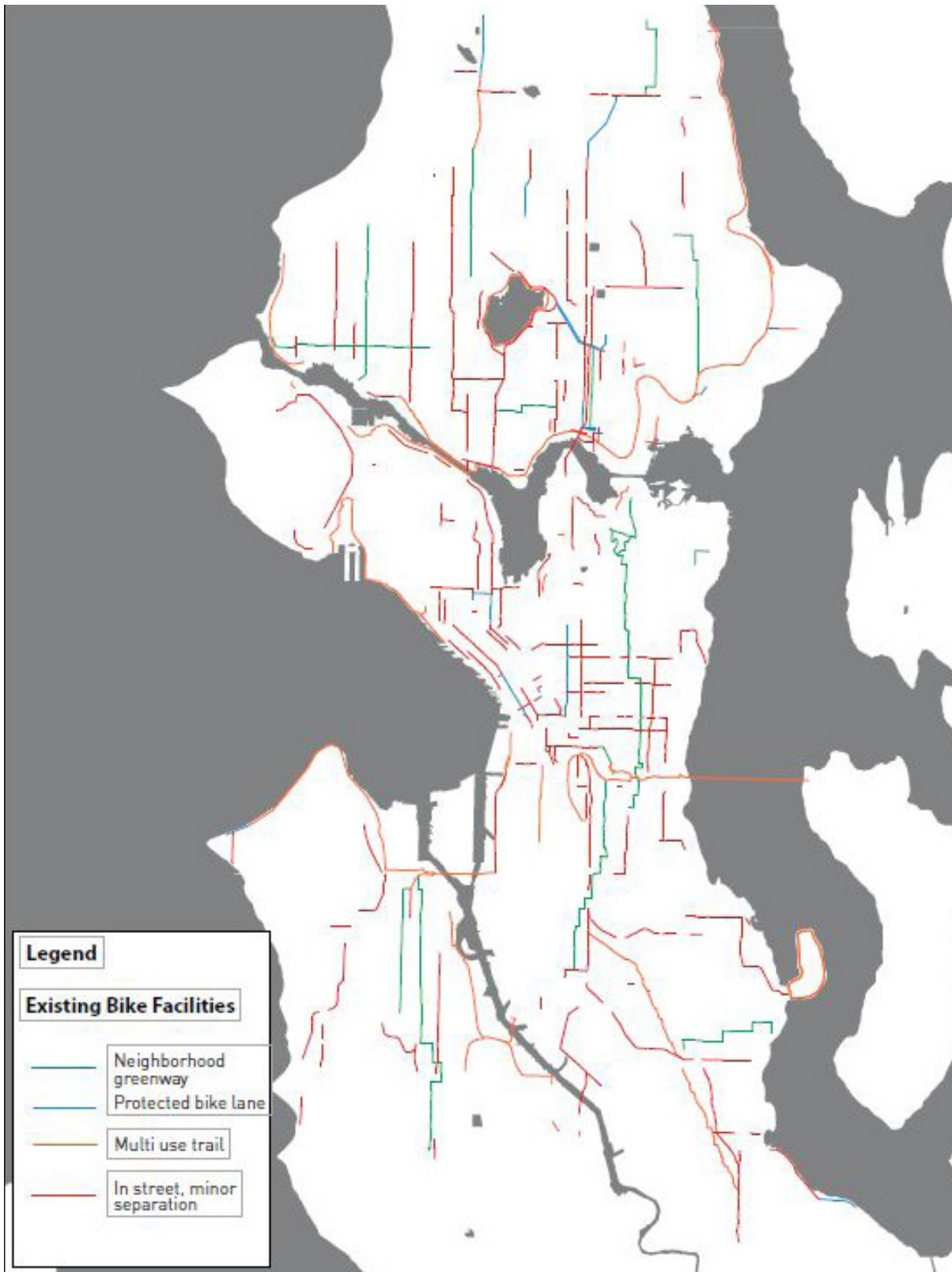


Exhibit 3.4–8 Existing Bicycle Facilities

Source: City of Seattle, 2017.

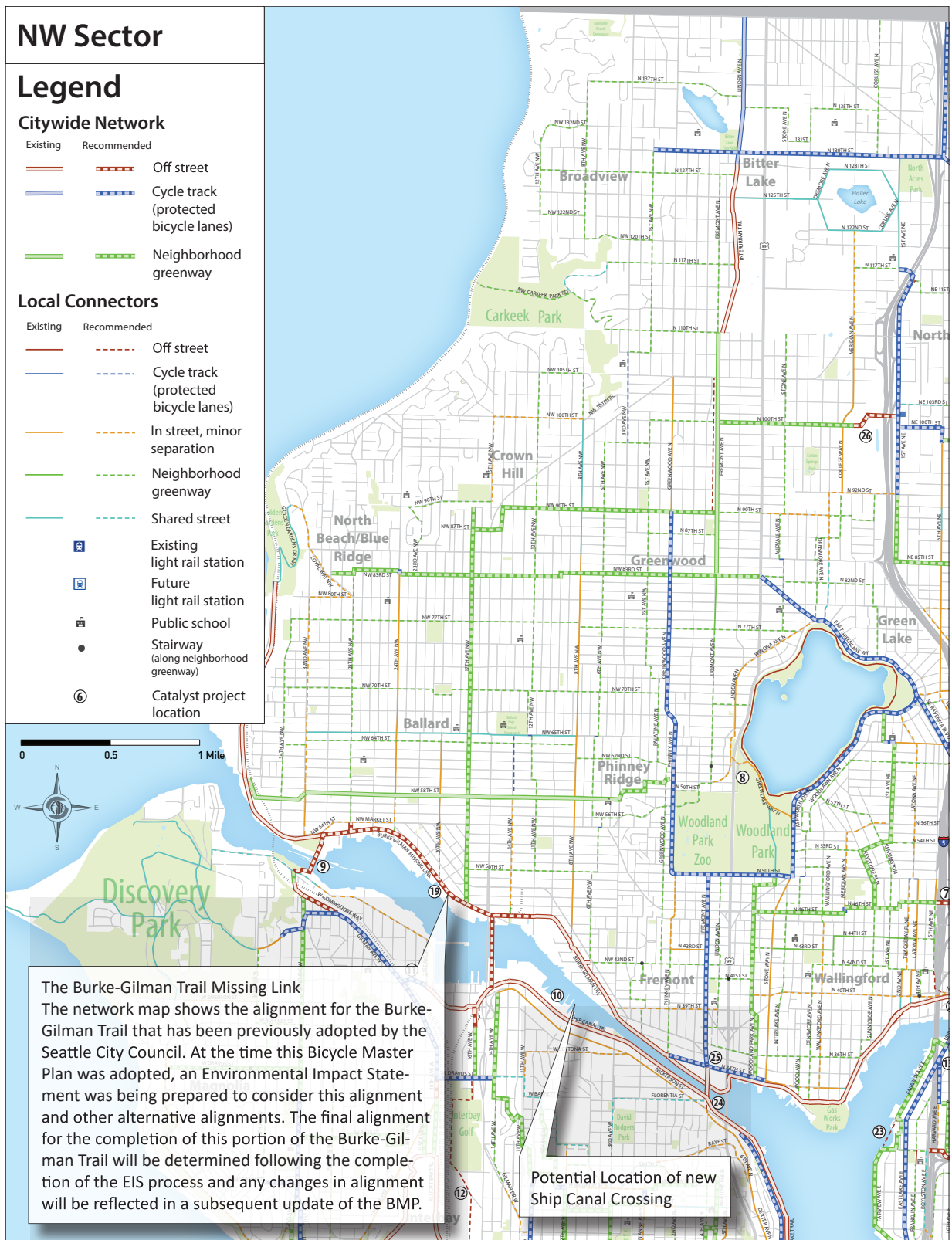


Exhibit 3.4–9 Planned Bicycle Network, Northwest Seattle

Source: City of Seattle, 2017.

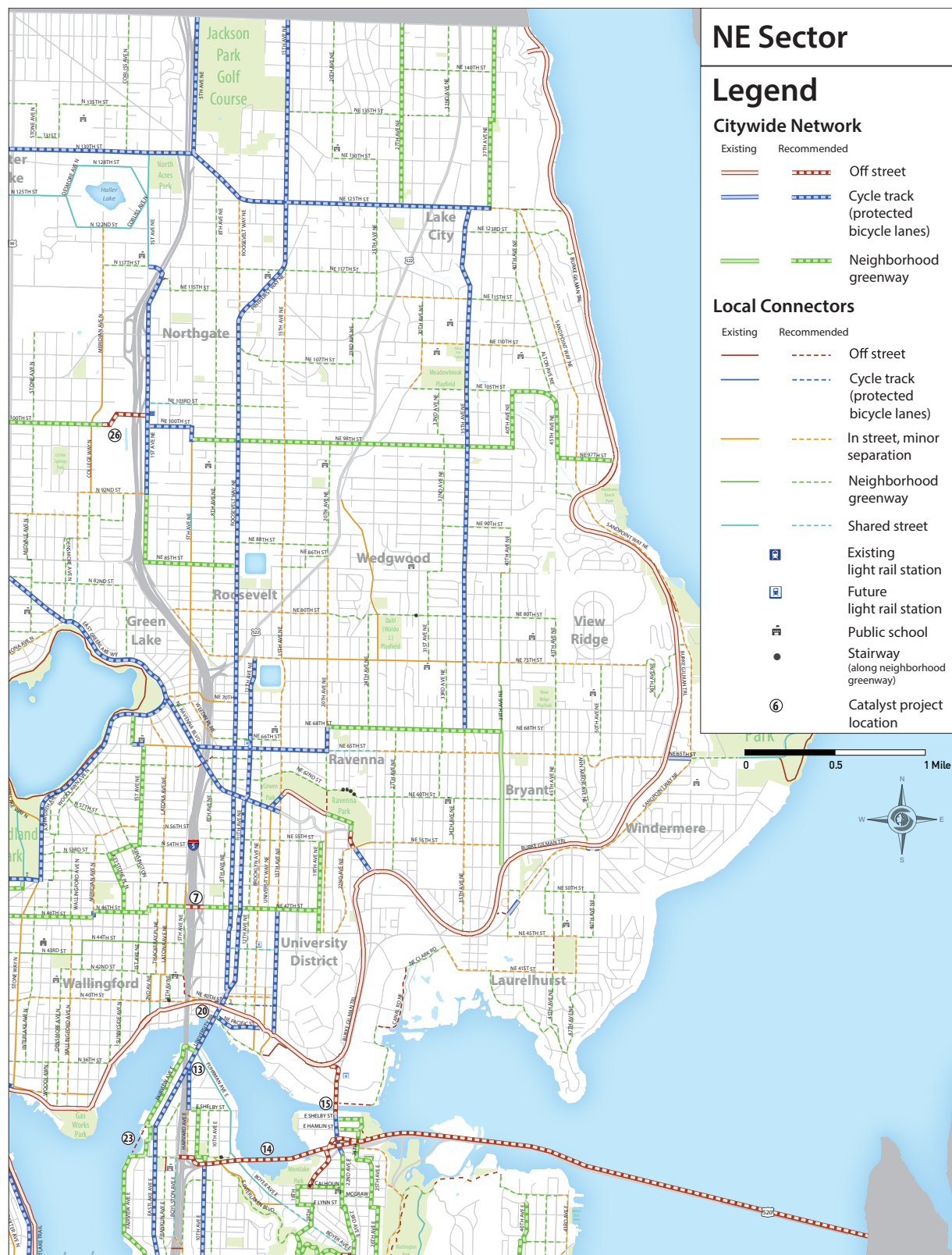


Exhibit 3.4–10 Planned Bicycle Network, Northeast Seattle

Source: City of Seattle, 2017.

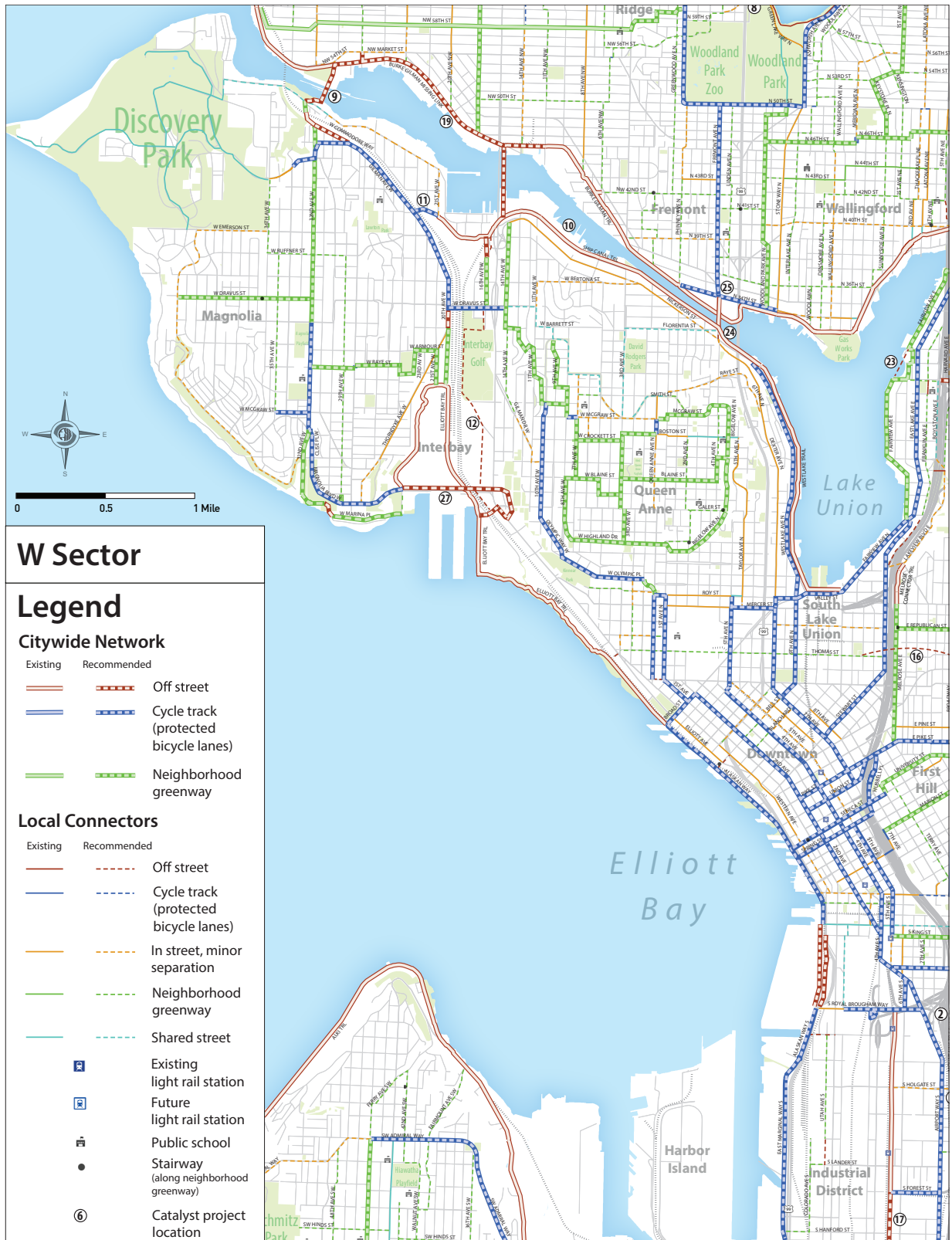


Exhibit 3.4–11 Planned Bicycle Network, West Central Seattle

Source: City of Seattle, 2017.



Exhibit 3.4–12 Planned Bicycle Network, East Central Seattle

Source: City of Seattle, 2017.



Exhibit 3.4–13 Planned Bicycle Network, Southwest Seattle

Source: City of Seattle, 2017.

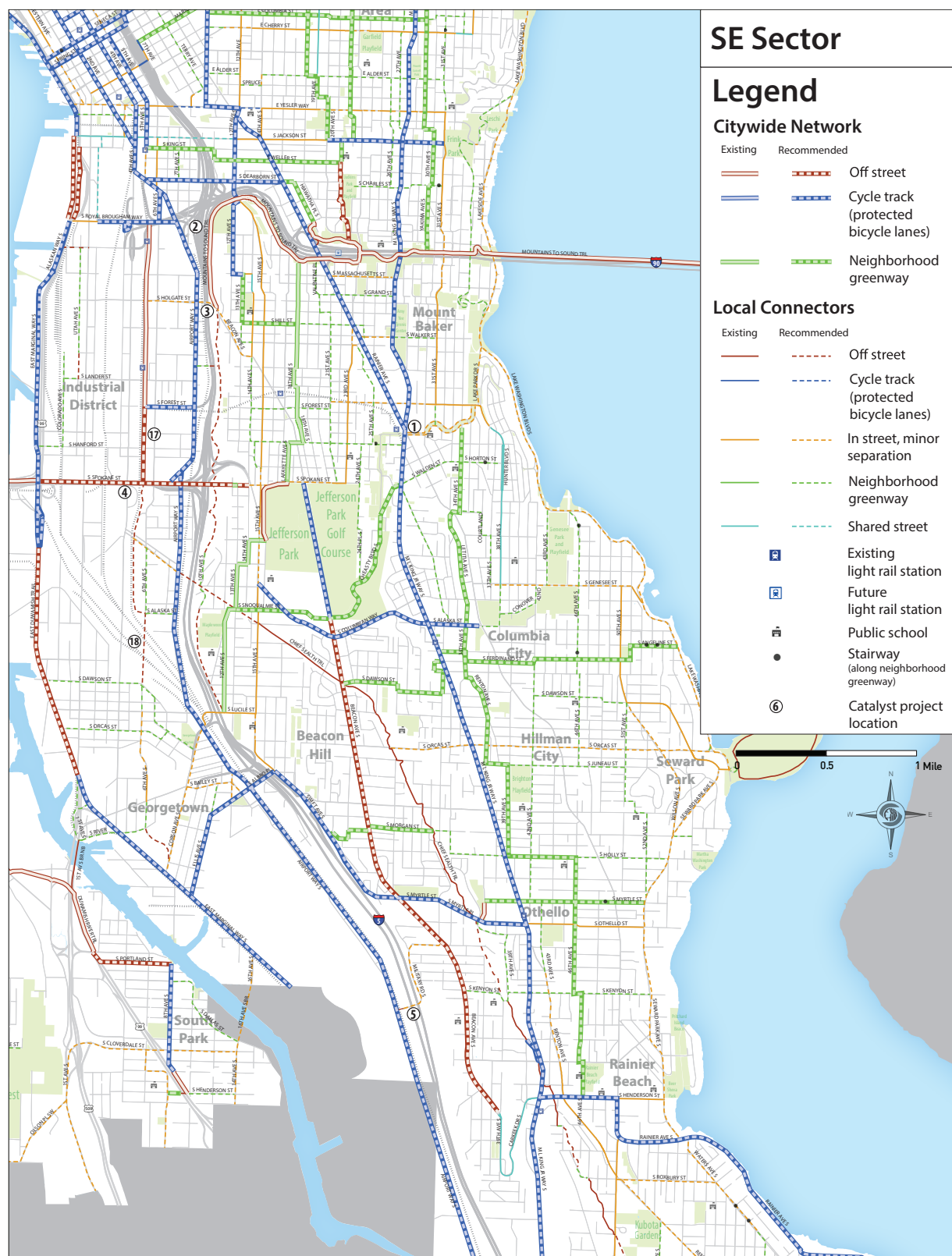


Exhibit 3.4–14 Planned Bicycle Network, Southeast Seattle

Source: City of Seattle, 2017.

Transit Services

Seattle's public transit services are provided by King County Metro, Sound Transit, Community Transit, and the City of Seattle. Transit data shows that there were 332,000 daily transit boardings in Seattle in 2016.¹ According to American Community Survey data, transit mode share for commute trips in Seattle has risen from 16 percent in 2005 to 21 percent in 2015. In the urban core of the city, transit ridership is substantially higher. In 2016, the mode share of workers who arrived to Seattle's center city core on weekdays between 6 AM and 9 AM by public transit was 47 percent. The transit mode share for the center city core has steadily risen since 2010 when it was 42 percent. The share of workers who drove alone to center city was 30 percent, down from 35 percent in 2010 (Commute Seattle 2017, 8).

- King County Metro operates a fixed route bus system that also includes "RapidRide," a separately-branded set of frequent transit routes in West Seattle, Ballard, North Seattle, and Downtown.
- Sound Transit Express and Community Transit operate buses that provide service from outside the City of Seattle.
- Rail transit services include Sound Transit Link Light Rail, City-operated streetcars in South Lake Union and First Hill, the monorail between Downtown and Seattle Center and the Sound Transit Sounder Commuter Train that provides service between Lakewood, Seattle and Everett during peak hours.

In 2016, the City amended its *Transit Master Plan* (TMP), which outlines the transit facilities, services and programs needed over the next 20 years to accommodate anticipated growth in Seattle. The City has designated ten High Capacity Transit (HCT) Corridors and eight Priority Bus Corridors, along with Link light rail and the street car system (see Exhibit 3.4–15). The plan recommends investments into seven HCT corridors to become new bus rapid transit (BRT) lines. These corridors are prioritized for capital investments to ensure mobility within Seattle, one of the key objectives outlined in the TMP. Another goal is to provide frequent transit service on these corridors to create and expand the Frequent Transit Network (a map of which may be found in the Seattle 2035 Comprehensive Plan). The Frequent Transit Network is composed of transit corridors that have, or are recommended for, frequent transit

¹ This daily transit boarding total includes King County Metro, Sound Transit and Community Transit routes. It does not include Pierce Transit routes.



Exhibit 3.4–15 Transit Master Plan, Priority Transit Corridors for Capital Investments

Source: City of Seattle, 2016.

service. This level of service is defined to encompass routes with average service frequency of 15 minutes or better for at least 18 hours per day, with service seven days per week (SDOT 2016b, 4-4).

Roadway Network

The City of Seattle includes roughly 1,550 lane-miles of arterial streets, 2,410 lane-miles of non-arterial streets, 117 bridges and 1,080 signalized intersections (City of Seattle 2017, 182). Much of Seattle's transportation network is constrained by the waterways within and around the city. The Ship Canal divides north Seattle from the rest of the city, with only six crossing points: the Ballard Bridge, the Fremont Bridge, State Route (SR) 99, Interstate 5 (I-5), the University Bridge and the Montlake Bridge. Likewise, West Seattle is separated from the rest of the city by the Duwamish Waterway, and is accessed via the West Seattle Bridge, Spokane Street Bridge, the First Avenue S Bridge and the South Park Bridge.

I-5 runs north-south throughout the city, serving both local and regional travelers. SR 99 also runs north-south through the city and tends to serve more locally focused trips. To the east, there are two bridges across Lake Washington: SR 520 and Interstate 90 (I-90). Other key state routes within the city include SR 522 connecting to the northeast and SR 509 connecting south to Sea-Tac Airport. City arterials generally follow a grid pattern. The City has designated a major truck street network throughout the city that carries a substantial amount of freight traffic. The state routes, interstates and major arterials linking major freight destinations are part of this network.

Parking

The City of Seattle regulates parking within its right-of-way by issuing on-street permits, charging by the hour, setting time limits and defining load zones. The city regularly assesses the performance of its parking management programs to manage changing demand patterns.

Restricted Parking Zone (RPZ) Program

Seattle designates certain areas as Restricted Parking Zones (RPZ), as shown in Exhibit 3.4–16. These zones have time-limited parking available to the public. Residents with eligible addresses can apply for a permit to use the curb parking in their neighborhood without time limits. The aim is to balance the parking needs of the public and the residents and ease parking congestion in certain locations. There are 31 zones

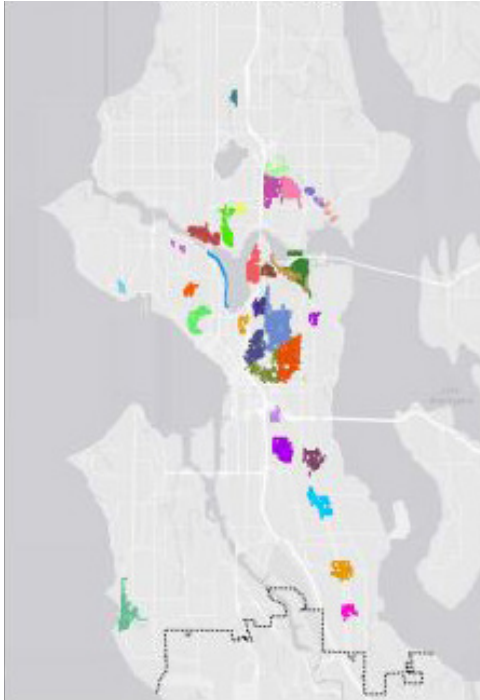


Exhibit 3.4–16
Restricted Parking Zones
Source: City of Seattle, 2017.

in Seattle, with an additional two zones during University of Washington Husky game days. Seattle is currently evaluating potential changes to the RPZ program to better manage on-street parking supply; however, no changes have been identified at the time of this EIS publication.

On-Street Paid Parking

On-street paid parking is located in most Seattle urban centers (except for the Northgate area) and in select smaller locations near commercial business areas such as the Ballard, Fremont, and Roosevelt neighborhoods. The City manages approximately 12,000 paid on-street spaces in 20 business districts. Through Seattle's Performance-Based Parking Program, on-street parking rates are adjusted in neighborhoods to reach a target parking occupancy. The Seattle Department of Transportation regularly collects citywide parking utilization data to implement the Performance-Based Parking Program, established by Seattle Municipal Code 11.16.121 that states, in part:

“ The Director shall establish on-street parking rates and shall adjust parking rates higher (up to the Maximum Hourly Rate), or lower (as low as the Minimum Hourly Rate) in neighborhood parking areas based on measured occupancy so that approximately one or two open spaces are available on each blockface. ”

The goals of the Performance-Based Parking Program are to:

- Support neighborhood business districts by having available on-street parking;
- Maintain adequate turnover and reduce meter feeding in commercial districts;
- Encourage adequate on-street parking availability, efficient use of off-street parking facilities, and enhanced use of transit and other transportation alternatives; and
- Reduce congestion in travel lanes caused by drivers looking for on-street parking.

Seattle's target on-street parking occupancy is 70–85 percent utilization citywide. Exhibit 3.4–17 shows the 2015 and 2016 daytime and evening occupancy rates by neighborhood. For neighborhoods with high concentrations of residential land uses, evening occupancy tends to be greater than daytime occupancy. In more commercial areas, generally closer to the city's urban centers, peak parking demand tends to occur during the daytime.

In 2016, three-quarters of the 32 surveyed locations experienced parking occupancy above the 85 percent target during either the daytime or evening periods. A quarter of the total locations experienced occupancy of 100 percent or more in at least one of the studied time periods.

The eight locations in which parking demand currently exceeds supply (i.e. occupancy of 100 percent or more) are:

- 12th Ave (evening)
- Ballard (evening)
- Capitol Hill—South (evening)
- Green Lake (daytime and evening)
- Pioneer Square—Core and Edge (daytime)
- Uptown—Core and Edge (evening)

Exhibit 3.4–17 Summary of 2015 and 2016 On-Street Occupancy by Neighborhood

Area	Subarea	2015 OCCUPANCY		2016 OCCUPANCY	
		11:00 AM—5:00 PM	7:00 PM	11:00 AM—4:00 PM	7:00 PM
12th Avenue		84%	106%	91%	108%
Ballard	Core	81%	103%	75%	105%
	Edge	72%	102%	77%	89%
Ballard Locks	Winter	19%	82%	36%	22%
	Summer	94%	52%	83%	69%
Belltown	North	71%	76%	74%	72%
	South	82%	86%	89%	87%
Capitol Hill	North	79%	101%	76%	91%
	South	77%	100%	72%	105%
Cherry Hill	Paid	93%	70%	98%	68%
Chinatown / ID	Core	92%	95%	96%	99%
	Edge	82%	92%	88%	76%
Commercial Core	Financial	91%	62%	94%	48%
	Retail	89%	63%	77%	65%
	Waterfront	93%	80%	94%	76%
Denny Triangle	North	88%	80%	94%	80%
	South	89%	72%	99%	90%
First Hill		93%	99%	95%	93%
Fremont	Paid	77%	88%	82%	90%
Green Lake	Paid	79%	99%	102%	108%
Pike-Pine	Paid	83%	106%	73%	93%
Pioneer Square	Core	101%	89%	101%	89%
	Edge	99%	83%	103%	80%
Roosevelt		73%	100%	54%	65%
South Lake Union	North	94%	27%	81%	48%
	South	98%	75%	91%	77%
University District	Core	75%	86%	77%	89%
	Edge	66%	30%	77%	51%
Uptown	Core	60%	94%	72%	101%
	Edge	75%	72%	75%	100%
Uptown Triangle		70%	56%	64%	64%
Westlake Ave N		77%	51%	79%	44%

Source: SDOT On-Street Paid Parking Occupancy Annual Report 2016c.

Safety

The City periodically releases reports summarizing citywide collision data. The most recently available data is for 2015, which had 10,930 police reported collisions. This number was slightly higher than the previous three years, but well below the highs of roughly 14,000–15,000 in years 2003 through 2008 (SDOT 2017b). The City has a Vision Zero policy that aims to reduce the number of fatalities and serious injuries to zero by 2030. The Vision Zero program includes a variety of strategies, including reduced speed limits, Safe Routes to Schools investments, safety improvements at high-risk locations, enforcement, and education. In 2016, there were 21 fatalities in the city. Although fatalities on city streets had been on a downward trend, there has been a recent increase. This trend is similar to what has been observed nationwide; a major factor in the uptick of fatalities is thought to be the increase in distracted driving.

RELEVANT PLANS AND POLICIES

Relevant policies related to transportation in Seattle are summarized below. The City of Seattle has a 10-year strategic plan outlined in *Move Seattle* (2015). Seattle also has master plans for transit, freight, pedestrians and bicyclists. More detailed information is available in the specified documents.

Move Seattle (2015)

Move Seattle is a strategic document published in 2015 that guides SDOT's work over the next ten years. The plan identifies the following three key elements:

- Organizing daily work around core values: a safe, interconnected, vibrant, affordable, and innovative city.
- Integrating modal plans to deliver transformational projects: this includes creating a near-term strategy to integrate recommendations from the freight, transit, walking, and bicycling 20-year modal plans.
- Prioritizing projects and work to identify funding: in 2015, voters approved a nine-year \$930 million Levy to Move Seattle. This funding source replaces the prior Bridging the Gap levy which expired in 2015. SDOT is using the levy funds to implement projects including safety improvements, new facilities, as well as maintenance of existing infrastructure.

Transportation Strategic Plan (2005)

The *Transportation Strategic Plan (TSP)* is the Seattle Department of Transportation's (SDOT's) 20-year work plan developed in 2005. This strategic plan was updated in 2015 as part of the Move Seattle initiative. It includes the strategies and actions required to achieve the goals and policies outlined in the Seattle Comprehensive Plan and to comply with PSRC regional planning documents. The TSP guides prioritization of resources to projects, programs and services. The TSP includes supporting data such as street classifications and traffic volumes, planning areas, transit routes and sidewalk inventory, among others. In addition annual reports show the progress made toward reaching the set goals.

Transit Master Plan (2016)

The *Transit Master Plan (TMP)* is a 20-year plan that outlines the needs to meet Seattle's transit demand through 2030. It prioritizes capital investment to create frequent transit services that meet the needs of residents and workers. It outlines the high priority transit corridors and the preferred modes (see Exhibit 3.4–15). This document refers to the Transportation Strategic Plan and specifies capital projects to improve speed and reliability. Goals include:

- Meet sustainability, growth management and economic development goals.
- Make it easier and more desirable to take transit.
- Respond to needs of transit-reliant populations.
- Create great places where modes connect.
- Advance implementation within constraints. The elements of the document include policies and programs, transit corridors and service, access and connections to transit and funding and performance monitoring.

Pedestrian Master Plan (2017)

The *Pedestrian Master Plan (PMP)* envisions Seattle as the most walkable and accessible city in the nation. To achieve that vision, the following goals are identified:

- Reduce the number and severity of crashes involving pedestrians;
- Develop a connected pedestrian environment that sustains healthy communities and supports a vibrant economy;
- Make Seattle a more walkable city for all through public engagement, service delivery, accessibility, and capital investments that promote equity; and
- Get more people moving to improve health and increase mobility.

The plan documents existing pedestrian facilities and creates a Priority Investment Network to guide future improvements (see Exhibit 3.4–2 through Exhibit 3.4–7).

Seattle Bicycle Master Plan (2014)

The *Seattle Bicycle Master Plan (BMP)* provides guidance on future investments in bicycle facilities in Seattle, with a vision for bicycling as a safe and convenient mode for people of all ages and abilities on a daily basis. Goals include increasing bicycle ridership, safety, connectivity, equity and livability. The document outlines the existing network and over 400 miles of planned future network for the city. Strategies for end-of-trip facilities, programs, maintenance, project prioritization and funding are included. SDOT publishes annual reports to update the public on its progress toward implementing BMP projects and meeting the identified performance measures.

Freight Master Plan (2016)

The *Freight Master Plan* was adopted by the city in 2016. Its purpose is to ensure efficient and predictable goods movement in the region to promote economic activity and international trade. It analyzes the current freight facilities and their ability to accommodate future freight growth. The plan identifies six main goals with a total of 92 actions that address economy, safety, mobility, state of good repair, equity, and the environment in order to create a comprehensive freight network. This document is especially important for the two designated manufacturing and industrial centers, Ballard-Interbay-Northend and Greater Duwamish, the Port of Seattle, and the railroad operations throughout the city.

City Of Seattle 2017–2022 Transportation Capital Improvement Program

For the 2017 to 2022 period, the *Capital Improvement Program (CIP)* plans to invest more than \$1.5 billion on developing, maintaining and operating Seattle's transportation system. The CIP aims to promote safe and efficient movement of people and goods and to enhance the quality of life, environments and economy within the city and surrounding areas. Funding has been designated for projects in the *Seattle Pedestrian Master Plan*, *Transit Master Plan*, *Bicycle Master Plan*, and *Freight Master Plan*. Highlighted improvement projects include:

- New sidewalks, particularly near schools
- School safety improvements
- Pedestrian crossing improvements and stairway rehabilitation
- Focus on ADA compliance for curb ramps
- Neighborhood greenways, bicycle lanes, and bicycle parking
- City Center Streetcar Connector project
- New Bus Rapid Transit corridors
- South Lander St Grade Separation
- Traffic camera replacement and maintenance
- Bridge replacement and repair
- 23rd Avenue Corridor Improvements
- Alaskan Way Viaduct and Seawall Replacement
- Elliott Bay Seawall Project
- Permitting System Integration
- Accessible Mt. Baker safety improvements
- Rainier Avenue Road Safety Corridor project

Complete Streets

This 2006 policy directs SDOT to consider roadway designs that balance the needs of all roadway users, including pedestrians, bicyclists, transit riders and people of all abilities, as well as automobiles and freight. Design decisions are based on data, such as the adjacent land uses and anticipated future transportation needs. There is no set design template for complete streets as every situation requires a unique balance of design features within the available right-of-way. However, examples include providing wider sidewalks, landscaping, bicycle lanes, transit stop amenities and adequate lane widths for freight operations.

ANALYSIS METHODOLOGY

The proposed actions being evaluated in this document are area-wide and programmatic in nature, rather than location specific. Therefore, the methodology used to evaluate potential changes and impacts to the transportation network is broad-based as is typical for the analysis of large-scale plan updates.²

This section describes the methodology used to analyze base year transportation conditions in Seattle. The base year for this analysis is 2015. For some metrics, the most recently available data is provided while others use estimates from the 2015 project travel demand model. The project travel demand model is discussed in more detail in 3.4.2 Impacts.

The analyses conducted for this EIS fall into two categories: those used to determine significant adverse transportation impacts and those provided for informational purposes only. These metrics are described in the following sections.

Metrics Used for Impact Identification

The standards included in Seattle's two most recent Comprehensive Plans (*Toward a Sustainable Seattle* first adopted in 2005 and *Seattle 2035* adopted in 2016) are used to determine significant transportation impacts in this EIS. Seattle 2035 included a shift in the way that transportation level of service is measured, from screenlines to mode share. While mode share is a better way to evaluate how the city is shifting travel to more space-efficient modes, screenlines will continue to be evaluated in this EIS to identify potential traffic congestion impacts. Pedestrian, bicycle, safety and parking conditions are also qualitatively evaluated and used for impact identification

Vehicle Volume-to-Capacity Screenlines

The 2005 Comprehensive Plan previously set the PM peak hour level of service (LOS) standards for locally-owned arterials and transit routes using the concept of "screenlines." Screenlines are used to evaluate autos (including freight) and transit as buses generally travel in the same traffic stream as autos. A screenline is an imaginary line that may intersect multiple arterials and across which the number of passing vehicles is counted. Each screenline's LOS standard is in the form of a volume-to-capacity (V/C) ratio: the number of vehicles crossing

² This large-scale analysis approach differs from the intersection-level analysis that may be more appropriate for assessing the effects of development on individual parcels or blocks.


the screenline compared to the designated capacity of the roadways crossing the screenline. The 2005 Comprehensive Plan evaluated 28 screenlines during the PM peak hour. Exhibit 3.4–18 and Exhibit 3.4–19 summarize the location of each screenline, as well as its LOS standard as designated in the 2005 Comprehensive Plan. The City no longer uses screenlines as its level of service standard, but it remains a useful metric for identifying areas experiencing congestion.

Exhibit 3.4–18 Screenline Level of Service Thresholds

Screenline #	Screenline Location	LOS Standard
1.11	North City Limit—3rd Ave NW to Aurora Ave N	1.20
1.12	North City Limit—Meridian Ave N to 15th Ave NE	1.20
1.13	North City Limit—30th Ave NE to Lake City Way NE	1.20
2	Magnolia	1.00
3.11	Duwamish River—West Seattle Bridge & Spokane St	1.20
3.12	Duwamish River—1st Ave S & 16th Ave S	1.20
4.11	South City Limit—Martin Luther King Jr. Way to Rainier Ave S	1.00
4.12	South City Limit—Marine Dr SW to Meyers Way S	1.00
4.13	South City Limit—SR 99 to Airport Way S	1.00
5.11	Ship Canal—Ballard Bridge	1.20
5.12	Ship Canal—Fremont Bridge	1.20
5.13	Ship Canal—Aurora Bridge	1.20
5.16	Ship Canal—University & Montlake Bridges	1.20
6.11	South of NW 80th St—Seaview Ave NW to 15th Ave NW	1.00
6.12	South of N(W) 80th St—8th Ave NW to Greenwood Ave N	1.00
6.13	South of N(E) 80th St—Linden Ave N to 1st Ave NE	1.00
6.14	South of NE 80th St—5th Ave NE to 15th Ave NE	1.00
6.15	South of NE 80th St—20th Ave NE to Sand Point Way NE	1.00
7.11	West of Aurora Ave—Fremont Pl N to N 65th St	1.00
7.12	West of Aurora Ave—N 80th St to N 145th St	1.00
8	South of Lake Union	1.20
9.11	South of Spokane St—Beach Dr SW to W Marginal Way SW	1.00
9.12	South of Spokane St—E Marginal Way S to Airport Way S	1.00
9.13	South of Spokane St—15th Ave S to Rainier Ave S	1.00
10.11	South of S Jackson St—Alaskan Way S to 4th Ave S	1.00
10.12	South of S Jackson St—12th Ave S to Lakeside Ave S	1.00
12.12	East of CBD	1.20
13.11	East of I-5—NE Northgate Way to NE 145th St	1.00
13.12	East of I-5—NE 65th St to NE 80th St	1.00
13.13	East of I-5—NE Pacific St to NE Ravenna Blvd	1.00

Source: *Toward a Sustainable Seattle, 2005 Comprehensive Plan.*

x.xx Screeline ID

 Screenline

Source: City of Seattle,
2017; Fehr & Peers, 2017.

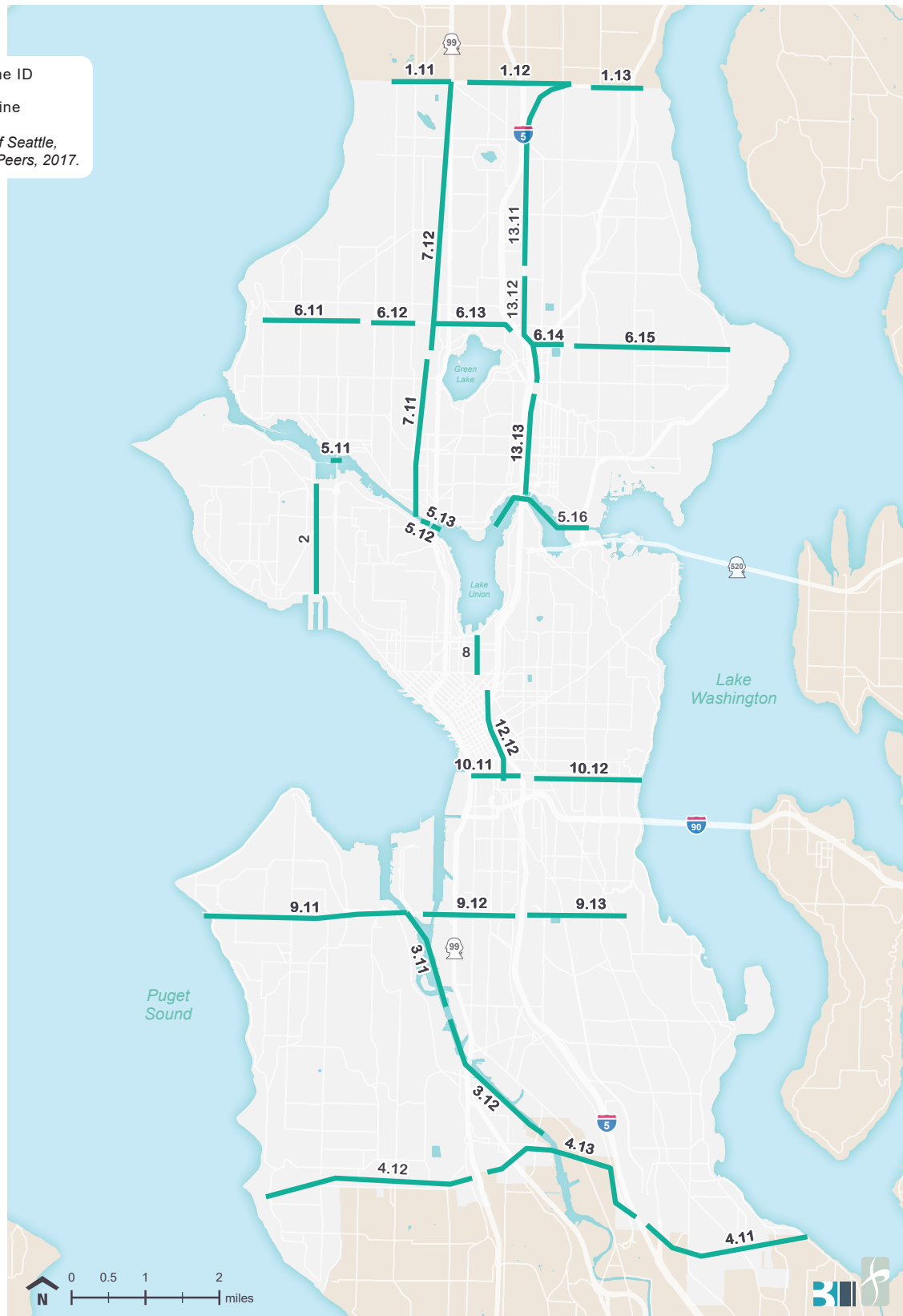


Exhibit 3.4-19 City of Seattle Screenlines

Mode Share

Seattle 2035 uses the concept of mode share to evaluate Seattle's transportation network. Mode share and single occupant vehicle (SOV) trips were evaluated for trips originating from or destined to each of the eight sectors during the PM peak period. All trip types are included in the analysis (as opposed to the commute trip mode share data from Commute Seattle or the US Census Bureau). The base year mode share estimates used in this analysis are from the 2014 PSRC Household Travel Survey. Forecasted future year mode shares pivot from the household survey results and are estimated using the projected change in mode share forecasted by the project travel demand model.

The City's new LOS concurrency mode share standard establishes as a goal that at least five percent of PM peak hour vehicle trips that would otherwise travel by SOV will shift to other modes (carpool, transit, bike, or walk) as a result of transportation demand management (TDM) strategies and public investments. This shift in travel modes is only assumed for new development—no additional mode shift is assumed for existing development. This results in drive alone mode share targets for each sector as shown in Exhibit 3.4–20.

Exhibit 3.4–20 Drive Alone Mode Share Targets

Sector	SOV Target (2035)
Northwest Seattle	37
Northeast Seattle	35
Queen Anne/Magnolia	38
Downtown/Lake Union	18
Capitol Hill/Central District	28
West Seattle	35
Duwamish	51
Southeast Seattle	38

Source: *Seattle 2035 Comprehensive Plan*, 2016.

Transit Daily Boardings

Transit is a critical part of maintaining the city's mobility. To assess the demand for transit against the system's capacity, daily transit boardings are evaluated under each alternative. King County Metro's Long-Range Plan anticipates providing a 70 percent increase in transit service hours by 2040 to serve more than double the number of existing daily boardings. The growth in projected AM period transit boardings in Seattle is evaluated to assess against King County Metro plans.

Overcrowding on specific transit lines is an indicator of whether or not adequate transit service is provided to support the planned growth and ridership demand in particular areas of the city. This EIS also evaluates transit overcrowding on the ten future BRT lines which cover the core transit corridors in Seattle. Most of these new BRT lines are enhancing existing transit routes with more frequent service, along with other capital investments.

King County Metro service guidelines measures bus overcrowding by setting a "crowding" threshold which represents what the maximum average passenger load should be for each transit trip. The crowding threshold allows for some standing passengers in addition to having all seats filled. To evaluate the transit service in this EIS, a ratio of the projected average maximum passenger load to the crowding threshold was calculated. Existing AM average maximum passenger loads were reported for each route using Fall 2016 data. Future year transit demand was estimated based on the increase in each BRT route's ridership growth forecasted in the project travel demand model.

Other Metrics

This EIS includes additional metrics to help illustrate the differences between existing conditions and each of the future year alternatives. However, the City has not adopted any formal standards for these metrics and they are not used to identify deficiencies or impacts within this environmental document.

State Facilities

The designated screenlines include some facilities owned by the Washington Department of Transportation (WSDOT), such as SR 99 and SR 522. To provide a complete assessment, this analysis was supplemented to include state facilities not included in the screenlines.

These include I-5, I-90, SR 509, SR 519 and SR 520, which are designated as Highways of Statewide Significance by WSDOT. Exhibit 3.4–21 summarizes the segments analyzed. WSDOT sets the standard for these facilities at LOS D for the PM peak hour.³ The purpose of the evaluation of state facilities is to monitor performance and facilitate coordination between the city and state per the Growth Management Act.

Exhibit 3.4–21 State Facility Analysis Locations

State Facility	Location	LOS Standard
I-5	North of NE Northgate Way	D
I-5	Ship Canal Bridge	D
I-5	North of West Seattle Bridge	D
I-5	North of Boeing Access Rd	D
I-90	East of Rainier Ave S	D
SR 509	Between S 112th St and Cloverdale St	D
SR 519	West of 4th Ave	D
SR 520	Lake Washington Bridge	D

Source: WSDOT Community Planning Portal, 2017.

The freeway segments are analyzed using the same V/C concept that the City uses for its screenlines. Average daily volumes were collected from WSDOT's online Community Planning Portal. Capacities were determined using a set of tables developed by the Florida Department of Transportation (FDOT) based on the 2010 Highway Capacity Manual. The capacities are based on the characteristics of the roadway including number of lanes, presence of auxiliary lanes and presence of ramp metering.⁴

³ LOS D is defined using the methodologies outlined in the Highway Capacity Manual, Transportation Research Board, 2010 and other methods based on this document.

⁴ Daily capacities for each LOS threshold are based upon equivalent PM peak hour conditions; they are factored to a time period for which data is more readily available. Therefore, this evaluation is representative of PM peak hour conditions as defined by WSDOT's LOS standard.

- # Corridor ID
- N Travel Time Corridor

Source: City of Seattle, 2017; Fehr & Peers, 2017.

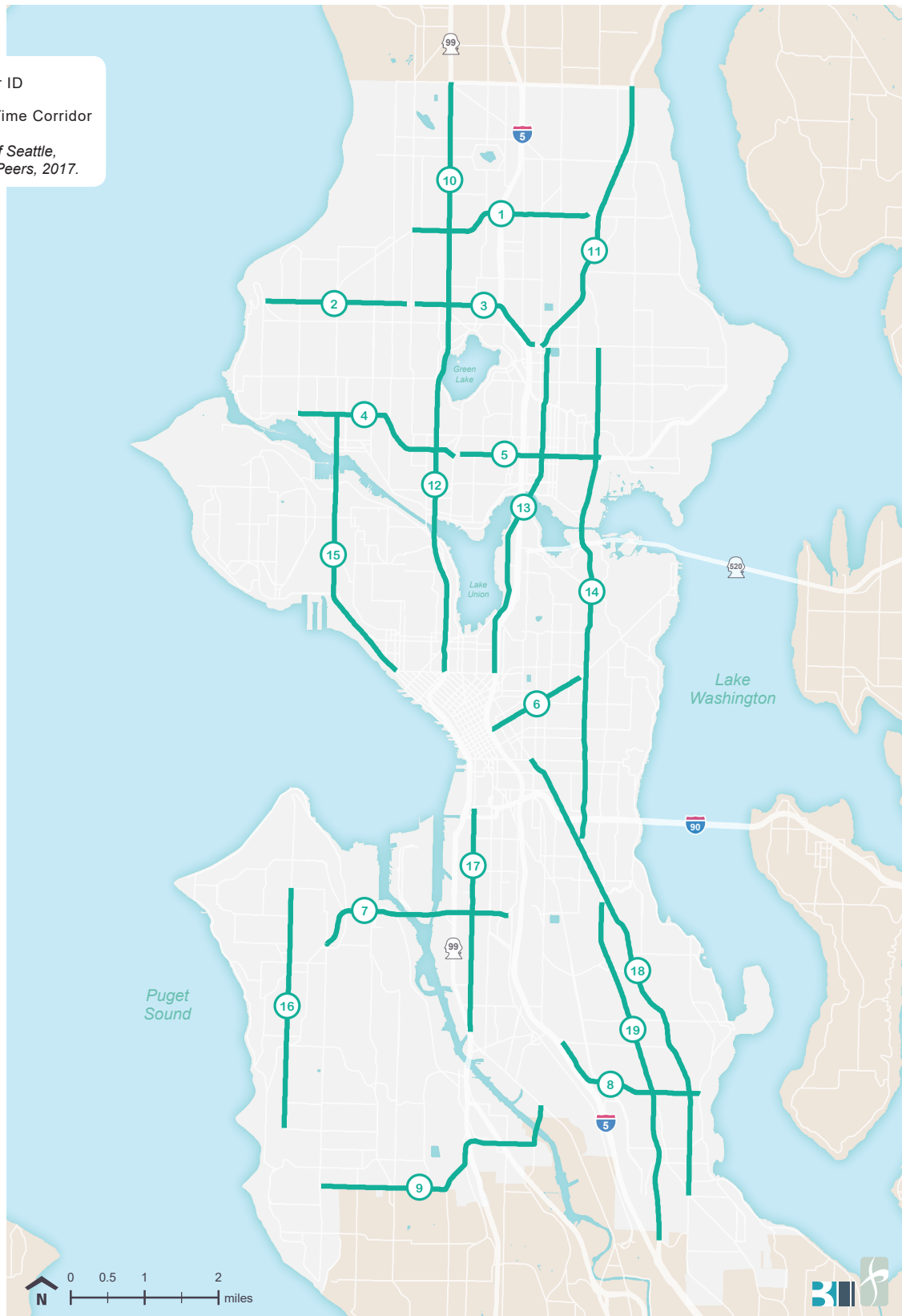


Exhibit 3.4–22 Travel Time Corridors

Travel Time

Travel time was selected as a performance measure for autos, freight and transit because it addresses the fundamental concern of most travelers—how long does it take to move within the city? Nineteen study corridors were selected throughout the city, as shown in Exhibit 3.4–22. Travel times were collected along each study corridor during the weekday PM peak hour from Google’s travel time estimates.⁵

The 2010 Highway Capacity Manual (HCM) defines thresholds for speed along urban streets to describe traffic operations by assigning a letter grade of A through F, where A represents free-flow conditions and F represents highly congested conditions.

Since speed is the inverse of travel time, these thresholds can be communicated in terms of travel time as shown in Exhibit 3.4–23. In simple terms, if you are traveling at half the posted speed limit, your travel time will be double what it would take traveling at the speed limit.

Exhibit 3.4–23 Thresholds for Travel Speeds and Travel Time

SPEED THRESHOLD		TRAVEL TIME THRESHOLDS
LOS	Percent of Free-Flow Speed	Ratio Between PM Peak Hour Travel Time and Travel Time at Free-Flow Speed
A-C	>50%	<2.0
D	>40-50%	2.0 to <2.5
E	>30-40%	2.5 to <3.33
F	≤30%	≥3.33

Source: *Highway Capacity Manual 2010*, Transportation Research Board.

The HCM criteria were developed for urban areas and therefore assume some level of delay at intersections because it is unrealistic to not encounter a red light on a typical trip.

⁵ Google’s travel time estimates are based on a variety of sources, including INRIX speed data.

ANALYSIS RESULTS

This section summarizes the results of the analysis used to evaluate existing transportation conditions in Seattle.

Metrics Used for Impact Identification

Screenlines

The most recently available PM peak hour traffic counts collected by the City of Seattle were compiled for the screenline analysis. Because traffic counts can vary considerably from year to year (due to unique factors on the day the count was taken, construction, etc.), an average of the available counts between 2012 and 2017 was used for each location.

As shown in Exhibit 3.4–24, none of the City's screenlines exceeded the standard that was in place for 2015. The screenline nearest to the capacity threshold is the Ballard Bridge at 0.99 in the northbound direction. However, the threshold there was set at 1.2.

Exhibit 3.4–24 2015 PM Peak Hour Screenline Volume-to-Capacity

Screenline #	Screenline Location	LOS Standard	NB/EB	SB/WB
1.11	North City Limit—3rd Ave NW to Aurora Ave N	1.20	0.74	0.55
1.12	North City Limit—Meridian Ave N to 15th Ave NE	1.20	0.76	0.45
1.13	North City Limit—30th Ave NE to Lake City Way NE	1.20	0.92	0.60
2	Magnolia	1.00	0.48	0.62
3.11	Duwamish River—West Seattle Bridge & Spokane St	1.20	0.60	0.85
3.12	Duwamish River—1st Ave S & 16th Ave S	1.20	0.36	0.37
4.11	South City Limit—Martin Luther King Jr. Way to Rainier Ave S	1.00	0.52	0.71
4.12	South City Limit—Marine Dr SW to Meyers Way S	1.00	0.38	0.45
4.13	South City Limit—SR 99 to Airport Way S	1.00	0.29	0.47
5.11	Ship Canal—Ballard Bridge	1.20	0.99	0.55
5.12	Ship Canal—Fremont Bridge	1.20	0.88	0.63
5.13	Ship Canal—Aurora Bridge	1.20	0.81	0.62
5.16	Ship Canal—University & Montlake Bridges	1.20	0.82	0.89
6.11	South of NW 80th St—Seaview Ave NW to 15th Ave NW	1.00	0.41	0.42
6.12	South of N(W) 80th St—8th Ave NW to Greenwood Ave N	1.00	0.74	0.65
6.13	South of N(E) 80th St—Linden Ave N to 1st Ave NE	1.00	0.49	0.41
6.14	South of NE 80th St—5th Ave NE to 15th Ave NE	1.00	0.55	0.50
6.15	South of NE 80th St—20th Ave NE to Sand Point Way NE	1.00	0.47	0.45
7.11	West of Aurora Ave—Fremont Pl N to N 65th St	1.00	0.52	0.66
7.12	West of Aurora Ave—N 80th St to N 145th St	1.00	0.46	0.58
8	South of Lake Union	1.20	0.49	0.42
9.11	South of Spokane St—Beach Dr SW to W Marginal Way SW	1.00	0.40	0.50
9.12	South of Spokane St—E Marginal Way S to Airport Way S	1.00	0.50	0.52
9.13	South of Spokane St—15th Ave S to Rainier Ave S	1.00	0.43	0.59
10.11	South of S Jackson St—Alaskan Way S to 4th Ave S	1.00	0.54	0.61
10.12	South of S Jackson St—12th Ave S to Lakeside Ave S	1.00	0.52	0.59
12.12	East of CBD	1.20	0.41	0.41
13.11	East of I-5—NE Northgate Way to NE 145th St	1.00	0.62	0.58
13.12	East of I-5—NE 65th St to NE 80th St	1.00	0.54	0.50
13.13	East of I-5—NE Pacific St to NE Ravenna Blvd	1.00	0.60	0.53

Source: SDOT count data, 2012–2017.

Mode Share

The PM peak period SOV mode share for all trips for each of the sectors is shown in Exhibit 3.4–25. Downtown/Lake Union has the lowest SOV share at 23 percent and Duwamish has the highest SOV share at 54 percent. The 2035 mode share targets are two to five percentage points lower than the existing SOV mode shares, which is expected because ongoing transit, pedestrian, and bicycle improvements are expected to reduce SOV trips over the coming years.

Transit Daily Boardings and Crowding

There was an average of 332,000 transit boardings in Seattle in 2016.⁶ Exhibit 3.4–26 summarizes the ratio of the existing maximum load to the crowding threshold for the AM period. Only peak direction of transit travel is shown for each route. As not all ten planned BRT routes currently exist, equivalent existing routes are reported. All routes have a ratio of maximum passenger load to crowding threshold at less than 1.0 during the AM period. Because the crowding threshold is larger than the number of seats on each bus trip, it means that some routes, such as the C Line and E Line with a ratio greater than 0.64, will have portions of the route with standing room only. The demand used for analysis is the average of the maximum loads during the AM peak. Some trips may have no capacity and be unable to accommodate all passengers resulting in skipped stops, but over the entire peak period, there is capacity on the corridors.

⁶ This daily transit boarding total includes King County Metro, Sound Transit and Community Transit routes. It does not include Pierce Transit routes.

Exhibit 3.4–25 2015 PM Peak Period Mode Share by Sector (Percentage)

Sector	SOV Target (2035)	SOV (2015)
Northwest Seattle	37	39
Northeast Seattle	35	37
Queen Anne/Magnolia	38	40
Downtown/Lake Union	18	23
Capitol Hill/Central District	28	33
West Seattle	35	37
Duwamish	51	54
Southeast Seattle	38	40

Note: PSRC Household Survey, 2014; Seattle 2035 Comprehensive Plan EIS Project Travel Demand Model, 2016; Fehr & Peers, 2016.

Exhibit 3.4–26 Existing Transit Crowding Ratio

BRT Route	Ratio of Existing Max Passenger Load to Crowding Threshold
C Line—West Seattle/Downtown	0.67
D Line—Ballard/Downtown	0.51
E Line—Aurora/Downtown	0.76
RR 1 (Route 12)—Madison	0.47
RR 2 (Route 120)—West Seattle/Downtown	0.50
RR 3 (Route 7)—Mt Baker/Downtown	0.28
RR 4 (Route 7 / 48)—Rainier/23rd Ave	0.28
RR 5 (Route 44)—Ballard/45th/UW	0.55
RR 6 (Route 40)—Northgate/Ballard/Westlake	0.60
RR 7 (Route 70)—Northgate/Roosevelt/Eastlake/Downtown	0.44

Source: King County Metro, 2016.

Other Metrics

Travel Times

Exhibit 3.4–27 and Exhibit 3.4–28 summarize existing auto travel times (minutes) in each direction along the study corridors. None of the study corridors currently operate at LOS F. However, ten of the corridors operate at LOS E in at least one direction, indicating traffic congestion throughout the city during the PM peak hour. Traffic congestion is more difficult for freight to navigate and trucks typically travel at slower speeds than general auto traffic. However, much of the daily freight movement activity occurs in the midday when traffic congestion is less pronounced.

Exhibit 3.4–27 Existing Corridor Travel Times

Corridor ID	Study Facility	LOS/TRAVEL TIME IN MINUTES	
		NB / EB	SB / WB
1	N 105th St—Greenwood Ave N to SR 522	D / 17.5	E / 20.0
2	NW 85th—32nd Ave NW to Greenwood Ave N	E / 12.5	D / 11.0
3	NW 85th St—Greenwood Ave N to SR 522	D / 11.5	E / 15.5
4	NW Market St—24th Ave NW to Stone Way N	E / 18.0	E / 20.0
5	N 45th St—Stone Way N to 25th Ave NE	E / 18.0	E / 18.5
6	E Madison St—I-5 to 23rd Ave	E / 15.0	E / 15.0
7	West Seattle Bridge—35th Ave SW to I-5	D / 8.5	D / 9.5
8	Swift Ave S—S Graham St to Seward Park Ave S	A-C / 10.0	A-C / 9.5
9	SW Roxbury St—35th Ave SW to E Marginal Way S	A-C / 16.0	A-C / 16.5
10	SR 99—N 145th St to N 80th St	E / 21.5	D / 17.5
11	SR 522—SR 523 to I-5	E / 26.0	D / 17.5
12	SR 99—N 80th St to Denny Way	D / 16.5	D / 16.5
13	Roosevelt Way NE / 12th Ave NE/Eastlake Ave—NE 75th St to Denny Way	E / 32.0	E / 34.5
14	25th Ave NE—NE 75th St to S Grand St	D / 41.5	E / 48.5
15	15th Ave/Elliott Ave—Market St to Denny Way	D / 20.0	A-C / 14.5
16	California Ave SW—SW Hanford St to SW Thistle St	A-C / 15.0	D / 16.5
17	1st Ave S—S Royal Brougham Way to E Marginal Way S	D / 16.5	D / 17.0
18	Rainier Ave S—E Yesler Way to Renton Ave S	D / 34.5	D / 41.5
19	MLK Jr Way S—Rainier Ave S to S Boeing Access Rd	A-C / 22.0	A-C / 24.0

Source: Google Maps, 2017.

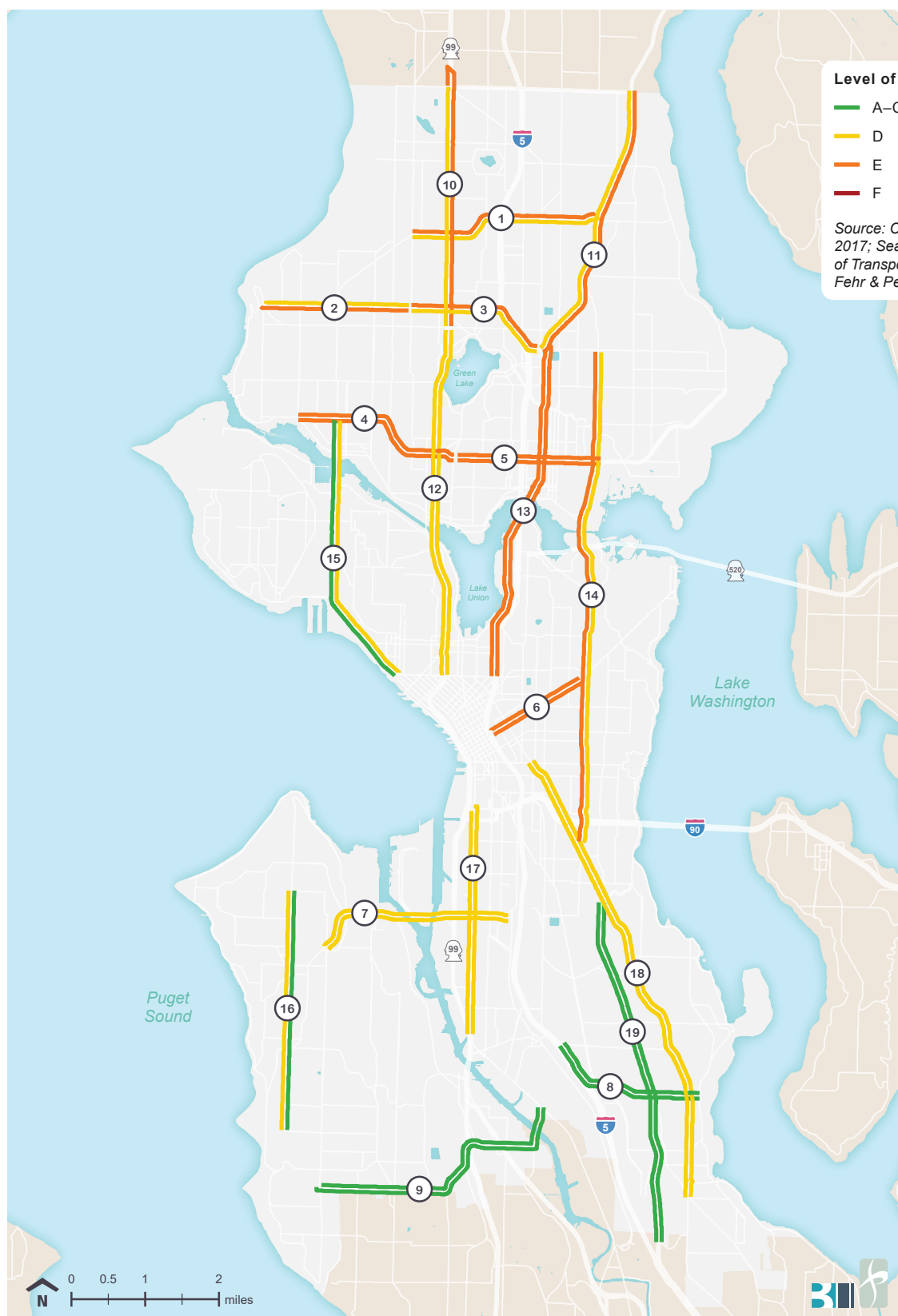


Exhibit 3.4-28 Existing Corridor Travel Times (2015)

State Facilities

Exhibit 3.4–29 summarizes the existing conditions on the state facility locations not included in the screenline analysis. Bold cells indicate that the volume-to-LOS D capacity ratio is over 1.0 meaning the facility is not meeting WSDOT's LOS standard. These include all four segments on I-5 and I-90 east of Rainier Avenue S. SR 520, which has tolling that limits demand, is currently meeting the LOS D standard, as are SR 509 and SR 519.

Exhibit 3.4–29 Existing Conditions of State Facility Analysis Locations

State Facility	Location	Daily Traffic Volume	Maximum Daily Capacity for LOS D	Volume-To-LOS D Capacity Ratio
I-5	North of NE Northgate Way	213,000	204,225	1.04
I-5	Ship Canal Bridge	206,000	162,015	1.27
I-5	North of West Seattle Bridge	242,000	194,500	1.24
I-5	North of Boeing Access Rd	206,000	194,500	1.06
I-90	East of Rainier Ave S	132,000	116,600	1.13
SR 509	Between S 112th St and Cloverdale St	57,000	93,100	0.61
SR 519	West of 4th Ave	28,000	32,400	0.86
SR 520	Lake Washington Bridge	68,000	77,900	0.87

Note: The WSDOT standard for all of the study facilities is LOS D. Volumes and capacities do not include express lanes on I-5 and I-90.

Source: WSDOT Community Planning Portal, 2015.

3.4.2 IMPACTS

This section describes the planning scenarios evaluated, the methodology used for the future year analysis and the results of the future year analysis. The future analysis year is 2035.

PLANNING SCENARIOS EVALUATED

Three alternatives were evaluated in the DEIS under future year 2035 conditions: the no action alternative and two action alternatives. The no action alternative assumes approximately 77,000 new housing units in the 2015–2035 timeframe; the action alternatives assume roughly 95,000 new housing units in the 2015–2035 timeframe, but vary in how the growth would be distributed (see Chapter 2, Exhibit 2–7). This FEIS includes analysis of an additional Preferred Alternative. The Preferred

Alternative is a modified version of the action alternatives in the DEIS and includes roughly the same amount of new housing units. The same transportation network is assumed under each alternative.

ANALYSIS METHODOLOGY

This section summarizes the analysis methodology used to evaluate future year (2035) conditions.

Transportation Network and Land Use Assumptions

The analysis for this EIS used a citywide travel demand forecasting model to distribute and assign vehicle traffic to area roadways. The travel demand forecasting model used for the Seattle 2035 Comprehensive Plan EIS served as the starting point for this analysis, but was refined with newer data regarding trip making characteristics and 2035 network assumptions. The model is based on the PSRC regional model with refinements within the City of Seattle. More information may be found in Appendix J. Key changes to the Seattle 2035 Comprehensive Plan model include:

- Updated land use within the City based on the Seattle 2035 land use map adopted by the City Council and recent zoning changes adopted for Downtown/South Lake Union, the University District, and Uptown;
- Updated land use outside of the City based on the latest available data from PSRC;
- Updated Public Use Microdata Sample (PUMS) data from the U.S. Census Bureau which provide household characteristics for different areas within the city, including income level, household size, and number of workers; and
- Updated transit network assumptions following the passage of the ST3 ballot measure and the amended Transit Master Plan.

Key elements of the travel demand model's structure are described below:

- **Analysis Years.** This version of the model has a base year of 2015 and a horizon year of 2035.
- **Land Use.** The City of Seattle developed land use forecasts for 2015 using a combination of sources including data from the Puget Sound Regional Council, Employment Securities Department, and Office of Planning and Community Development. Land use forecasts were then developed for each of the 2035 alternatives by distributing the expected growth according to each alternative's assumed development pattern.

- **Highways and Streets.** The existing highway and major street systems within the City of Seattle are fully represented in the 2015 model; those planned to be present by 2035 are included in the 2035 model.
- **Transit.** The travel model has a full representation of the transit system under base year (2015) conditions. The horizon year transit system is based on assumptions of service from Sound Transit's 2035 travel demand model (released in September 2013), Sound Transit 3 project information for high capacity transit projects expected to open by 2035, and the Seattle Transit Master Plan.
- **Travel Costs.** The model accounts for the effects of auto operating costs, parking, transit fares and tolls (on SR 520 and SR 99) on travel demand.
- **Travel Demand.** The model predicts travel demand for seven modes of travel: drive alone, carpool (2 person), carpool (3 or more people), transit, trucks, walking and bicycling. Travel demand is estimated for five time periods. This analysis will focus on the PM peak period.

The 2035 network was modified to reflect completion of the City's transportation modal plans, thus providing a test of the City's planned infrastructure. This includes rechannelization that could occur with implementation of the City's Bicycle Master Plan. Key Transit Master Plan projects such as frequent service on priority transit corridors and dedicated bus lanes were included in the model. Detailed assumptions may be found in Appendix J. The assumptions were determined in conjunction with City staff using the best knowledge available at the time.

Consideration of Affordable Housing Characteristics

The proposed alternatives are aimed at providing additional affordable housing within the City of Seattle. To capture the varying trip-making characteristics of different income levels, the inputs to the project travel demand model were modified to reflect the proportion of affordable housing proposed under each alternative. This was completed through modifications to the PUMS household characteristic dataset.

Forecast Development

Travel demand forecasts including traffic volumes, travel times, transit trips, and mode shares, were prepared for each of the three alternatives during the PM peak period using the travel model. To reduce model error, a technique known as the "difference method" was applied for traffic volumes, travel times and mode share. Rather than take the direct output from the 2035 model, the difference method calculates the growth between the base year and 2035 models and adds that growth

to existing data when available. For example, assume a road has an existing hourly volume of 500 vehicles. If the base year model showed a volume of 400 vehicles and the future year model showed a volume of 650 vehicles, 250 vehicles would be added to the existing count for a future expected volume of 750 vehicles.

Thresholds of Significance

In an EIS, the action alternatives (Alternatives 2, and 3, and the Preferred Alternative) are assessed against Alternative 1 No Action to identify impacts. The rationale behind this approach is to compare changes in the transportation system expected to result from City actions against transportation changes expected under “business-as-usual” conditions. Pedestrian, bicycle, safety and parking impacts are evaluated qualitatively. Thresholds of significance for other metrics used for impact identification are described below.

Screenlines

Screenlines are intended to measure the extent of traffic congestion impacts across the city. A deficiency is identified for the no action alternative if it would cause a screenline to exceed the threshold (shown in Exhibit 3.4–18).

The above criterion also applies to action alternatives provided no deficiency has been identified for the no action alternative. However, if the no action alternative already exceeds the threshold, then a potentially significant impact will only be identified if the action alternative would exceed the threshold by at least 0.01 more than the no action alternative.

Mode Share

A deficiency is identified for the no action alternative if it would cause a sector of the city to exceed its stated SOV target (see Exhibit 3.4–20).

The above criterion also applies to action alternatives provided no deficiency has been identified for the no action alternative. However, if the no action alternative exceeds the target, then a significant impact will only be identified if the action alternative exceeds the target by at least 0.5 percent more than the no action alternative.

Transit Daily Boardings

King County Metro’s Long-Range Plan anticipates a doubling (a 100 percent increase) of daily bus boardings by 2040. Because this EIS

looks out only to year 2035, a transit ridership increase of greater than 80 percent was selected as the threshold of significance. Therefore, a deficiency is identified for the no action alternative if citywide transit boardings increase by more than 80 percent. This threshold acknowledges that some trips on certain routes may be overcrowded and that stops may be skipped because the bus is full. However, overall system capacity is not exceeded unless the total boardings grow at a rate higher

This criterion also applies to action alternatives provided no deficiency has been identified for the no action alternative. However, if the no action alternative already exceeds the threshold, then an impact will only be identified if the action alternative exceeds the threshold by at least one percentage point more than the no action alternative.

Other Metrics

Other metrics have been prepared in this analysis, including state facility v/c ratios and corridor travel times. Because the City has not adopted standards for those metrics, they are not currently used to determine significant transportation impacts. They are provided for informational purposes only.

IMPACTS COMMON TO ALL ALTERNATIVES

Pedestrian and Bicycle Network

The City has identified robust 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 City will continue to monitor traffic safety and take steps, as necessary, to address areas with high collision rates. It is expected that the safety program will result in decreases to the number of traffic fatalities and serious injuries over time. ~~The action a~~ As reported in the DEIS, Alternatives 2 and 3 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. Another main contributing factor to the number of traffic fatalities and serious injuries is speed. The travel demand model indicates that speeds throughout the network would be slightly lower under ~~the action a~~ Alternatives 2 and 3 than under the no action alternative, which could have a beneficial effect on safety. Due to the similarities in levels of growth between Alternatives 2, 3, and the Preferred Alternative, the safety findings for Alternatives 2 and 3 are also representative of the Preferred Alternative.

The minor magnitude of these safety indicators are not expected to substantively change the level of safety among the future year alternatives. Therefore, at this programmatic level of analysis, no significant impacts are expected under any of the alternatives.

Parking

The City prioritizes the use of its streets to balance competing needs, including pedestrians, bicycles, transit, autos, and freight. As stated in *Seattle 2035*, the City considers the “flex zone” along the curb to provide parking, bus stops, passenger loading, freight loading, travel lanes during peak times or other activating uses such as parklets or play streets (City of Seattle 2016, 75). Decisions about how flex zones are used will continue to evolve by location depending on the transportation and land use context of each area. It is assumed the supply of on-street parking is unlikely to increase by 2035.

As stated in the Affected Environment section, 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.

The location and severity of impacts would vary by alternative depending on the concentrations of land use. The degree of the parking supply deficiency and impacts experienced in any given neighborhood would depend on factors including how much off-street parking is provided by future development projects, as well as varying conditions related to on-street parking patterns, city regulations (e.g., how many RPZ permits are issued, enforcement, etc.) within each neighborhood.

DEFICIENCIES OF ALTERNATIVE 1 NO ACTION

Metrics Used for Impact Identification

Screenlines

Exhibit 3.4–30 and Exhibit 3.4–31 summarize the projected PM peak hour volumes across each screenline in 2035. 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:

- Screenline 4.11: South City Limit–Martin Luther King Jr. Way to Rainier Ave S in the southbound direction
- Screenline 5.11: Ship Canal–Ballard Bridge in the northbound direction
- Screenline 10.12: South of S Jackson St–12th Ave S to Lakeside Ave S in the southbound direction

Therefore, deficiencies under the no action alternative are expected for automobile traffic, freight, and transit at those locations.

Exhibit 3.4–30 2035 PM Peak Hour Screenline Volume-to-Capacity, Alternative 1 No Action

Screenline #	Screenline Location	LOS Standard	2015		ALTERNATIVE 1 NO ACTION	
			NB/EB	SB/WB	NB/EB	SB/WB
1.11	North City Limit—3rd Ave NW to Aurora Ave N	1.20	0.74	0.55	1.07	0.81
1.12	North City Limit—Meridian Ave N to 15th Ave NE	1.20	0.76	0.45	0.93	0.56
1.13	North City Limit—30th Ave NE to Lake City Way NE	1.20	0.92	0.60	1.14	0.78
2	Magnolia	1.00	0.48	0.62	0.54	0.64
3.11	Duamish River—West Seattle Bridge & Spokane St	1.20	0.60	0.85	0.68	1.13
3.12	Duamish River—1st Ave S & 16th Ave S	1.20	0.36	0.37	0.40	0.40
4.11	South City Limit—Martin Luther King Jr. Way to Rainier Ave S	1.00	0.52	0.71	0.63	1.05
4.12	South City Limit—Marine Dr SW to Meyers Way S	1.00	0.38	0.45	0.58	0.76
4.13	South City Limit—SR 99 to Airport Way S	1.00	0.29	0.47	0.46	0.81
5.11	Ship Canal—Ballard Bridge	1.20	0.99	0.55	1.27	0.74
5.12	Ship Canal—Fremont Bridge	1.20	0.88	0.63	0.97	0.80
5.13	Ship Canal—Aurora Bridge	1.20	0.81	0.62	0.95	0.84
5.16	Ship Canal—University & Montlake Bridges	1.20	0.82	0.89	0.97	1.03
6.11	South of NW 80th St—Seaview Ave NW to 15th Ave NW	1.00	0.41	0.42	0.48	0.47
6.12	South of N(W) 80th St—8th Ave NW to Greenwood Ave N	1.00	0.74	0.65	0.98	0.93
6.13	South of N(E) 80th St—Linden Ave N to 1st Ave NE	1.00	0.49	0.41	0.62	0.55
6.14	South of NE 80th St—5th Ave NE to 15th Ave NE	1.00	0.55	0.50	0.66	0.63
6.15	South of NE 80th St—20th Ave NE to Sand Point Way NE	1.00	0.47	0.45	0.62	0.55
7.11	West of Aurora Ave—Fremont Pl N to N 65th St	1.00	0.52	0.66	0.72	0.98
7.12	West of Aurora Ave—N 80th St to N 145th St	1.00	0.46	0.58	0.63	0.75
8	South of Lake Union	1.20	0.49	0.42	0.64	0.49
9.11	South of Spokane St—Beach Dr SW to W Marginal Way SW	1.00	0.40	0.50	0.48	0.67
9.12	South of Spokane St—E Marginal Way S to Airport Way S	1.00	0.50	0.52	0.64	0.72
9.13	South of Spokane St—15th Ave S to Rainier Ave S	1.00	0.43	0.59	0.61	0.91
10.11	South of S Jackson St—Alaskan Way S to 4th Ave S	1.00	0.54	0.61	0.63	0.82
10.12	South of S Jackson St—12th Ave S to Lakeside Ave S	1.00	0.52	0.59	0.83	1.01
12.12	East of CBD	1.20	0.41	0.41	0.39	0.45
13.11	East of I-5—NE Northgate Way to NE 145th St	1.00	0.62	0.58	0.74	0.74
13.12	East of I-5—NE 65th St to NE 80th St	1.00	0.54	0.50	0.61	0.63
13.13	East of I-5—NE Pacific St to NE Ravenna Blvd	1.00	0.60	0.53	0.80	0.75

Source: Fehr & Peers, 2017.

x.xx Screenline ID

 Screenline

 Screenline Above Threshold

Source: City of Seattle, 2017; Fehr & Peers, 2017.

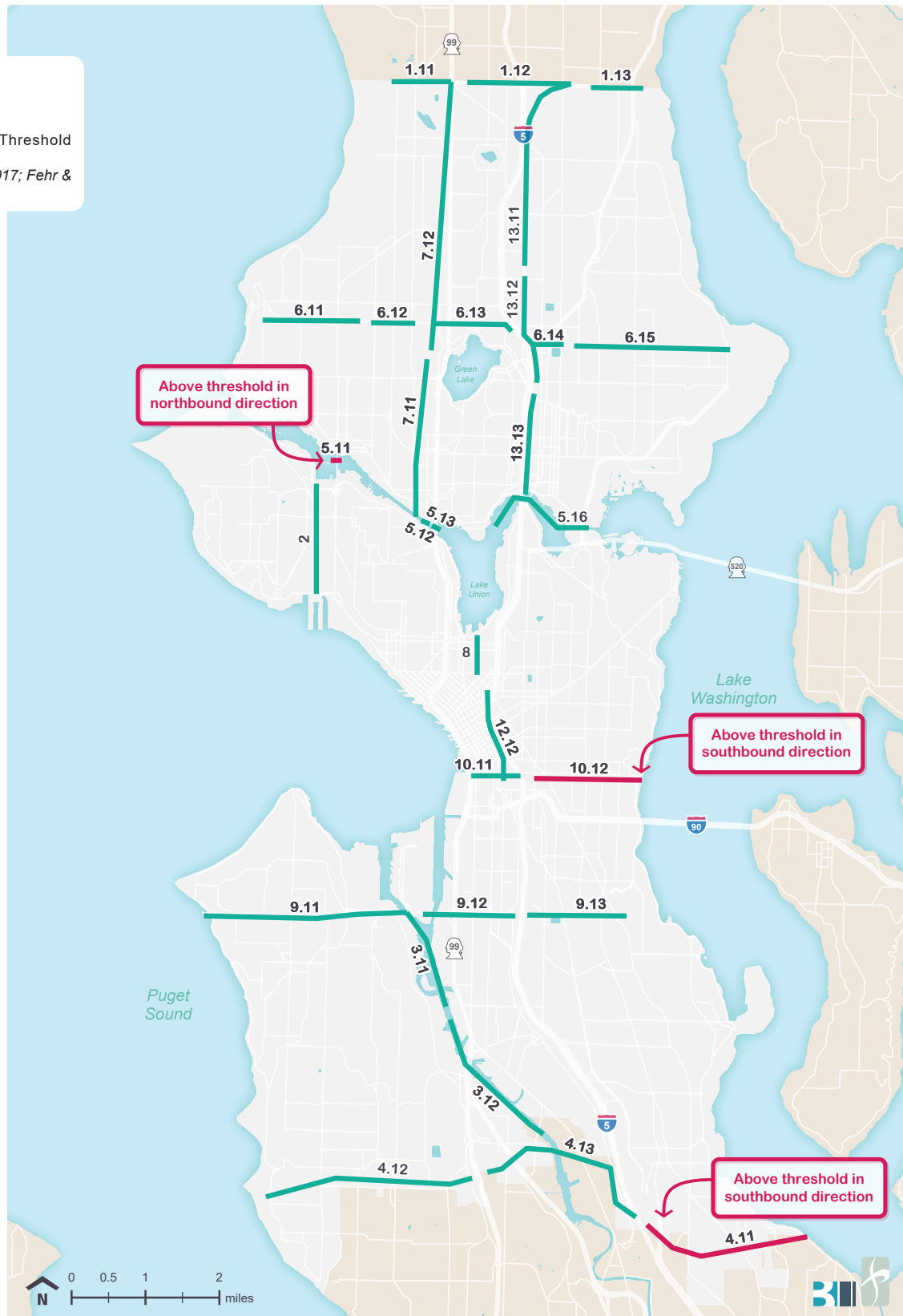


Exhibit 3.4-31 2035 Screenline V/C Ratios, All Alternatives

Mode Share

As noted in the Methodology section, the mode share estimates presented here are based on the travel demand forecasting model. By 2035, the SOV mode share is expected to decrease (a positive trend), although the amount of the decrease varies depending on the sector, as shown in Exhibit 3.4–32. Downtown/Lake Union is expected to see the highest SOV decrease of six percentage points, while West Seattle and Southeast Seattle are each projected to have a 2 percentage point decrease. All of the sectors are expected to meet the 2035 SOV target under the no action alternative.

Exhibit 3.4–32 2035 PM Peak Period Mode Share by Sector (Percentage), Alternative 1 No Action

Sector	SOV Target (2035)	Existing (2015)	Alternative 1 No Action (2035)
Northwest Seattle	37	39	36
Northeast Seattle	35	37	34
Queen Anne/Magnolia	38	40	37
Downtown/Lake Union	18	23	17
Capitol Hill/Central District	28	33	28
West Seattle	35	37	35
Duwamish	51	54	51
Southeast Seattle	38	40	38

Note: Fehr & Peers, 2017.

Transit Daily Boardings

The project model forecasts a 74 percent increase in transit boardings in Seattle under the no action alternative. Because this is lower than the 80 percent significance threshold, no deficiency is identified. Moreover, the projected increase in transit boardings from the model includes both bus and light rail, while the threshold is based on bus boardings only. Therefore, this is a very conservative assessment as much of the 74 percent increase would occur on light rail.

For informational purposes, crowding ratios were also forecasted along the ten BRT routes within the city, as shown in Exhibit 3.4–33. The results indicate that additional transit trips would operate with standing room only and be unable to accommodate all passengers resulting in skipped stops. Others would have ridership growth beyond the crowding thresholds, particularly on the RR 2, RR 6, and RR 7 corridors. Note that the transit

assumptions in the model are only estimates of the future year routes, stops, and headways that will be in place. In practice, King County Metro continually adjusts its service to accommodate demand on the busiest corridors by shifting buses from less crowded to more crowded routes. Therefore, while crowding would likely occur on some routes and for only some trips on those routes, Metro's overall plans for increased service hours and boardings are in line with the increase in boardings expected under the no action alternative. It is reasonable to assume that Metro could add more buses to the busiest routes to accommodate some or all of the crowding identified in Exhibit 3.4–33.

Exhibit 3.4–33 2035 Transit Crowding Ratio, Alternative 1 No Action

BRT Route	PASSENGER LOAD TO CROWD THRESHOLD RATIO		
	Existing	Alternative 1 No Action (2035)	Additional Riders per Peak Hour Trip
C Line—West Seattle/Downtown	0.67	0.75	6
D Line—Ballard/Downtown	0.51	0.51	0
E Line—Aurora/Downtown	0.76	0.89	10
RR 1 (Route 12)—Madison	0.47	0.49	12
RR 2 (Route 120)—West Seattle/Downtown	0.50	1.06	40
RR 3 (Route 7)—Mt Baker/Downtown	0.28	0.30	0
RR 4 (Route 7 / 48)—Rainier/23rd Ave	0.28	0.30	0
RR 5 (Route 44)—Ballard/45th/UW	0.55	0.91	24
RR 6 (Route 40)—Northgate/Ballard/Westlake	0.60	1.45	60
RR 7 (Route 70)—Northgate/Roosevelt/Eastlake/Downtown	0.44	1.03	43

Note: King County Metro, Fehr & Peers, 2017.

Other Metrics

State Facilities

Exhibit 3.4–34 summarizes 2035 conditions on the state facilities not included in the screenline analysis. Bold cells indicate that the v/c ratio is over 1.0 meaning the facility would not meet WSDOT's LOS standard in 2035.

Exhibit 3.4–34 State Facility Analysis—2035 Volume-to-LOS
D Capacity Ratio, Alternative 1 No Action

State Facility	Location	2015	Alternative 1 No Action (2035)
I-5	North of NE Northgate Way	1.04	1.22
I-5	Ship Canal Bridge	1.27	1.39
I-5	North of West Seattle Bridge	1.24	1.35
I-5	North of Boeing Access Rd	1.06	1.23
I-90	East of Rainier Ave S	1.13	1.34
SR 509	Between S 112th St and Cloverdale St	0.61	0.84
SR 519	West of 4th Ave	0.86	0.99
SR 520	Lake Washington Bridge	0.87	1.10

Note: Forecasted average daily traffic volumes do not include express lane volumes on I-5 and I-90.

Source: WSDOT, 2015; Fehr & Peers, 2017.

As indicated by the rising v/c ratios, traffic is expected to increase along the major freeway corridors between 2015 and 2035. This growth in traffic is due in part to increased development in Seattle, but regional and statewide growth also contribute to increased traffic on the freeways. With this increase in traffic, six study segments are expected to exceed WSDOT's LOS D standard under Alternative 1 No Action. SR 509 and SR 519 are expected to meet WSDOT's LOS D standard.

Travel Time

Exhibit 3.4–35 and Exhibit 3.4–36 summarize 2035 Alternative 1 No Action auto travel times along 19 corridors in each direction. Travel times for 2015 are also shown to illustrate how travel times would change over time regardless of the proposed action alternatives. Note that these results also represent freight operations which travel in the same lanes as auto traffic. However, traffic congestion is more difficult for freight to navigate, and trucks typically travel at slower speeds than general auto traffic.

By 2035, five study corridors are expected to drop to LOS F:

- NW 85th St between Greenwood Avenue N and SR 522;
- NW Market Street between 24th Avenue NE and Stone Way N;
- West Seattle Bridge between I-5 and 35th Ave SW;
- SR 99 between SR 523 and N 80th St; and
- SR 522 between SR 523 and I-5.

Auto travel times are expected to increase by up to 11.5 minutes between 2015 and 2035, with the largest increases projected along the westbound West Seattle Bridge, 25th Avenue NE, southbound Rainier Avenue S, and southbound MLK Jr Way S. However, travel time increases vary considerably depending on location with some corridors projected to experience very little change.

Exhibit 3.4–35 2035 Corridor Travel Times, Alternative 1 No Action

Corridor ID	Study Facility	2015 LOS/Minutes		ALT. 1 NO ACTION (2035) LOS/Minutes	
		NB / EB	SB / WB	NB / EB	SB / WB
1	N 105th St—Greenwood Ave N to SR 522	D / 17.5	E / 20.0	D / 18.0	E / 20.5
2	NW 85th—32nd Ave NW to Greenwood Ave N	E / 12.5	D / 11.0	E / 13.0	D / 11.5
3	NW 85th St—Greenwood Ave N to SR 522	D / 11.5	E / 15.5	E / 12.0	F / 16.0
4	NW Market St—24th Ave NW to Stone Way N	E / 18.0	E / 20.0	E / 19.5	F / 22.5
5	N 45th St—Stone Way N to 25th Ave NE	E / 18.0	E / 18.5	E / 19.0	E / 19.5
6	E Madison St—I-5 to 23rd Ave	E / 15.0	E / 15.0	E / 15.5	E / 15.5
7	West Seattle Bridge—35th Ave SW to I-5	D / 8.5	D / 9.5	D / 9.0	F / 15.0
8	Swift Ave S—S Graham St to Seward Park Ave S	A-C / 10.0	A-C / 9.5	A-C / 10.5	A-C / 10.0
9	SW Roxbury St—35th Ave SW to E Marginal Way S	A-C / 16.0	A-C / 16.5	A-C / 17.0	D / 20.5
10	SR 99—N 145th St to N 80th St	E / 21.5	D / 17.5	F / 26.0	E / 19.0
11	SR 522—SR 523 to I-5	E / 26.0	D / 17.5	F / 31.0	D / 19.5
12	SR 99—N 80th St to Denny Way	D / 16.5	D / 16.5	E / 20.0	E / 20.0
13	Roosevelt Way NE / 12th Ave NE/Eastlake Ave—NE 75th St to Denny Way	A-C / 32.0	E / 34.5	E / 37.0	E / 38.5
14	25th Ave NE—NE 75th St to S Grand St	D / 41.5	E / 48.5	E / 47.0	E / 56.5
15	15th Ave/Elliott Ave—Market St to Denny Way	D / 20.0	A-C / 14.5	E / 24.5	A-C / 17.0
16	California Ave SW—SW Hanford St to SW Thistle St	E / 15.0	D / 16.5	D / 15.5	D / 17.0
17	1st Ave S—S Royal Brougham Way to E Marginal Way S	D / 16.5	D / 17.0	D / 17.0	E / 21.0
18	Rainier Ave S—E Yesler Way to Renton Ave S	D / 34.5	D / 41.5	D / 36.0	E / 53.0
19	MLK Jr Way S—Rainier Ave S to S Boeing Access Rd	A-C / 22.0	A-C / 24.0	A-C / 23.5	E / 33.5

Source: Google Maps, 2017; Fehr & Peers, 2017.

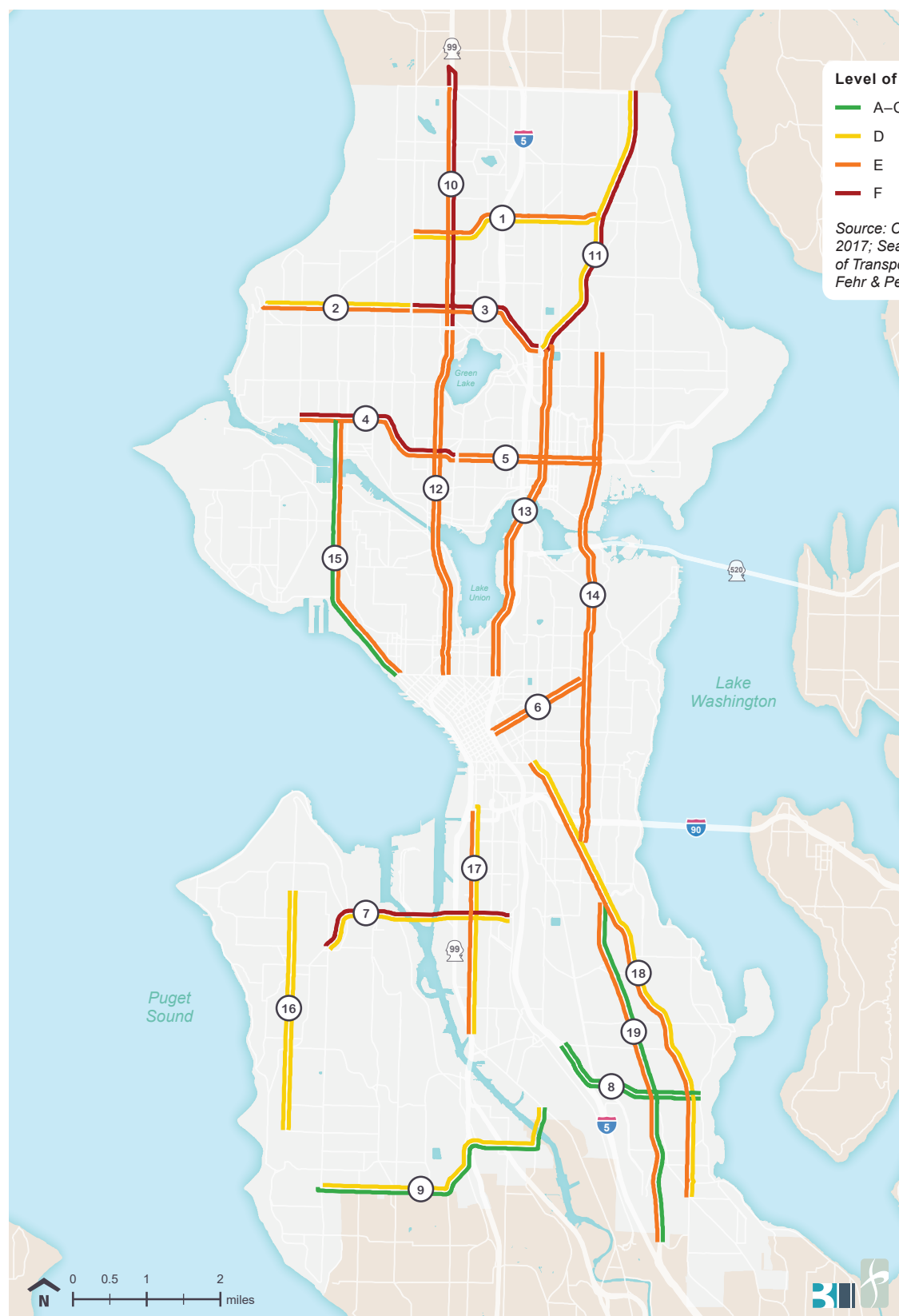


Exhibit 3.4-36 2035 Corridor Travel Times, Alternative 1 No Action

IMPACTS OF ALTERNATIVE 2

Metrics Used for Impact Identification

Screenlines

Exhibit 3.4–37 and Exhibit 3.4–31 summarize the projected PM peak hour volumes across each screenline in 2035. Alternative 2 is expected to result in modest increases in traffic volumes across some screenlines; the increased traffic results in a volume-to-capacity ratio increase of up to 0.03 depending on location. Alternative 2 is projected to result in volume-to-capacity ratios at least 0.01 higher than the no action alternative at the following screenlines:

- Screenline 4.11: South City Limit–Martin Luther King Jr. Way to Rainier Ave S in the southbound direction
- Screenline 5.11: Ship Canal–Ballard Bridge in the northbound direction
- Screenline 10.12: South of S Jackson St–12th Ave S to Lakeside Ave S in the southbound direction

Therefore, a potentially significant adverse impact is expected to automobile traffic, freight, and transit under Alternative 2.

Exhibit 3.4–37 2035 PM Peak Hour Screenline Volume-to-Capacity, Alternative 2

Screenline #	Screenline Location	LOS Standard	ALT. 1 NO ACTION (2035)		ALT. 2 (2035)	
			NB/EB	SB/WB	NB/EB	SB/WB
1.11	North City Limit—3rd Ave NW to Aurora Ave N	1.20	1.07	0.81	1.08	0.83
1.12	North City Limit—Meridian Ave N to 15th Ave NE	1.20	0.93	0.56	0.93	0.56
1.13	North City Limit—30th Ave NE to Lake City Way NE	1.20	1.14	0.78	1.14	0.78
2	Magnolia	1.00	0.54	0.64	0.54	0.65
3.11	Duamish River—West Seattle Bridge & Spokane St	1.20	0.68	1.13	0.69	1.14
3.12	Duamish River—1st Ave S & 16th Ave S	1.20	0.40	0.40	0.40	0.40
4.11	South City Limit—Martin Luther King Jr. Way to Rainier Ave S	1.00	0.63	1.05	0.66	1.08
4.12	South City Limit—Marine Dr SW to Meyers Way S	1.00	0.58	0.76	0.59	0.76
4.13	South City Limit—SR 99 to Airport Way S	1.00	0.46	0.81	0.47	0.81
5.11	Ship Canal—Ballard Bridge	1.20	1.27	0.74	1.28	0.75
5.12	Ship Canal—Fremont Bridge	1.20	0.97	0.80	0.98	0.81
5.13	Ship Canal—Aurora Bridge	1.20	0.95	0.84	0.96	0.85
5.16	Ship Canal—University & Montlake Bridges	1.20	0.97	1.03	0.99	1.05
6.11	South of NW 80th St—Seaview Ave NW to 15th Ave NW	1.00	0.48	0.47	0.48	0.47
6.12	South of N(W) 80th St—8th Ave NW to Greenwood Ave N	1.00	0.98	0.93	0.98	0.95
6.13	South of N(E) 80th St—Linden Ave N to 1st Ave NE	1.00	0.62	0.55	0.62	0.56
6.14	South of NE 80th St—5th Ave NE to 15th Ave NE	1.00	0.66	0.63	0.66	0.65
6.15	South of NE 80th St—20th Ave NE to Sand Point Way NE	1.00	0.62	0.55	0.62	0.56
7.11	West of Aurora Ave—Fremont Pl N to N 65th St	1.00	0.72	0.98	0.72	0.99
7.12	West of Aurora Ave—N 80th St to N 145th St	1.00	0.63	0.75	0.64	0.76
8	South of Lake Union	1.20	0.64	0.49	0.65	0.50
9.11	South of Spokane St—Beach Dr SW to W Marginal Way SW	1.00	0.48	0.67	0.49	0.67
9.12	South of Spokane St—E Marginal Way S to Airport Way S	1.00	0.64	0.72	0.65	0.72
9.13	South of Spokane St—15th Ave S to Rainier Ave S	1.00	0.61	0.91	0.62	0.91
10.11	South of S Jackson St—Alaskan Way S to 4th Ave S	1.00	0.63	0.82	0.63	0.82
10.12	South of S Jackson St—12th Ave S to Lakeside Ave S	1.00	0.83	1.01	0.84	1.02
12.12	East of CBD	1.20	0.39	0.45	0.39	0.46
13.11	East of I-5—NE Northgate Way to NE 145th St	1.00	0.74	0.74	0.74	0.74
13.12	East of I-5—NE 65th St to NE 80th St	1.00	0.61	0.63	0.61	0.64
13.13	East of I-5—NE Pacific St to NE Ravenna Blvd	1.00	0.80	0.75	0.80	0.77

Source: Fehr & Peers, 2017.

Mode Share

As shown in Exhibit 3.4–38, Alternative 2 is expected to have the same SOV mode share as Alternative 1 for all sectors and all sectors are expected to meet the 2035 SOV targets. Therefore, no mode share impacts are expected under Alternative 2.

Exhibit 3.4–38 2035 PM Peak Period Mode Share by Sector (Percentage), Alternative 2

Sector	SOV Target (2035)	Alternative 1 No Action (2035)	Alternative 2 (2035)
Northwest Seattle	37	36	36
Northeast Seattle	35	34	34
Queen Anne/Magnolia	38	37	37
Downtown/Lake Union	18	17	17
Capitol Hill/Central District	28	28	28
West Seattle	35	35	35
Duwamish	51	51	51
Southeast Seattle	38	38	38

Note: Fehr & Peers, 2017.

Transit Daily Boardings

The project model forecasts a 79 percent increase beyond existing transit boardings in Seattle under Alternative 2. Because this is lower than the 80 percent significance threshold, no impact is identified. Again, this is a conservative assessment because much of the increase would occur on light rail while the threshold is based on bus boardings only.

For informational purposes, crowding ratios were also forecasted along the ten BRT routes within the city, as shown in Exhibit 3.4–39. The results indicate that conditions along many routes would be similar to the no action alternative where some transit trips would operate with standing room only and be unable to accommodate all passengers resulting in skipped stops. Others would have ridership growth beyond the crowding thresholds; however, transit rider loads would increase on

several of the routes. The largest transit rider increases would occur on RR 2 between West Seattle and Downtown, RR 5 between Ballard and UW, and RR 6 between Northgate, Ballard and Westlake.

Exhibit 3.4–39 2035 Transit Crowding Ratio, Alternative 2

BRT Route	PASSENGER LOAD TO CROWD THRESHOLD RATIO		Additional Riders per Peak Hour Trip
	Alternative 1 No Action (2035)	Alternative 2 (2035)	
C Line—West Seattle/Downtown	0.75	0.75	0
D Line—Ballard/Downtown	0.51	0.51	0
E Line—Aurora/Downtown	0.89	0.89	0
RR 1 (Route 12)—Madison	0.49	0.51	1
RR 2 (Route 120)—West Seattle/Downtown	1.06	1.11	3
RR 3 (Route 7)—Mt Baker/Downtown	0.30	0.31	1
RR 4 (Route 7 / 48)—Rainier/23rd Ave	0.30	0.30	0
RR 5 (Route 44)—Ballard/45th/UW	0.91	0.94	3
RR 6 (Route 40)—Northgate/Ballard/Westlake	1.45	1.53	7
RR 7 (Route 70)—Northgate/Roosevelt/Eastlake/Downtown	1.03	1.03	0

Note: King County Metro, Fehr & Peers, 2017.

Note that the transit assumptions in the model are only estimates of the future year routes, stops, and headways that will be in place. In practice, King County Metro continually adjusts its service planning to accommodate demand on the busiest corridors. Therefore, while crowding would likely occur on some routes, Metro's overall plans for increased service hours and boardings are in line with the increase in boardings expected under Alternative 2.

Other Metrics

State Facilities

Exhibit 3.4–40 summarizes 2035 conditions on the state facilities not included in the screenline analysis. Bold cells indicate that the v/c ratio is over 1.0 meaning the facility would not meet WSDOT’s LOS standard in 2035.

Exhibit 3.4–40 State Facility Analysis—2035 Volume-to-LOS D Capacity Ratio, Alternative 2

State Facility	Location	Alt. 1 No Action (2035)	Alt. 2 (2035)
I-5	North of NE Northgate Way	1.22	1.22
I-5	Ship Canal Bridge	1.39	1.41
I-5	North of West Seattle Bridge	1.35	1.35
I-5	North of Boeing Access Rd	1.23	1.23
I-90	East of Rainier Ave S	1.34	1.35
SR 509	Between S 112th St and Cloverdale St	0.84	0.84
SR 519	West of 4th Ave	0.99	0.99
SR 520	Lake Washington Bridge	1.10	1.13

Note: Forecasted average daily traffic volumes do not include express lane volumes on I-5 and I-90.

Source: WSDOT, 2015; Fehr & Peers, 2017.

With the increase in traffic associated with Alternative 2, six study segments are expected to exceed WSDOT’s LOS D standard.

Note that the difference in the v/c ratios between the no action alternative and Alternative 2 is very small, no more than 0.03 v/c. The largest differences are projected to occur along the I-5 Ship Canal Bridge and the SR 520 Lake Washington Bridge. Daily traffic fluctuations tend to be of this magnitude or larger and this difference may not be noticed by drivers.

Travel Time

Exhibit 3.4–41 and Exhibit 3.4–42 summarize 2035 auto travel times along 19 corridors for Alternative 2 compared to the no action alternative. Note that these results are also relevant for freight operations which travel in the same lanes as auto traffic. However, traffic congestion is more difficult for freight to navigate, and trucks typically travel at slower speeds than general auto traffic. Compared to the no action alternative, Alternative 2 would result in minimal changes to travel times, with all increases expected to be no more than one minute.

Exhibit 3.4–41 2035 Corridor Travel Times, Alternative 2

Corridor ID	Study Facility	ALT. 1 NO ACTION (2035) LOS/Minutes		ALT. 2 (2035) LOS/Minutes	
		NB / EB	SB / WB	NB / EB	SB / WB
1	N 105th St—Greenwood Ave N to SR 522	D / 18.0	E / 20.5	D / 18.0	E / 21.0
2	NW 85th—32nd Ave NW to Greenwood Ave N	E / 13.0	D / 11.5	E / 13.0	D / 11.5
3	NW 85th St—Greenwood Ave N to SR 522	E / 12.0	F / 16.0	E / 12.0	F / 16.0
4	NW Market St—24th Ave NW to Stone Way N	E / 19.5	F / 22.5	E / 19.5	F / 22.5
5	N 45th St—Stone Way N to 25th Ave NE	E / 19.0	E / 19.5	E / 19.51	F / 19.5
6	E Madison St—I-5 to 23rd Ave	E / 15.5	E / 15.5	E / 15.5	E / 15.5
7	West Seattle Bridge—35th Ave SW to I-5	D / 9.0	F / 15.0	D / 9.0	F / 15.5
8	Swift Ave S—S Graham St to Seward Park Ave S	A-C / 10.5	A-C / 10.0	A-C / 10.5	A-C / 10.0
9	SW Roxbury St—35th Ave SW to E Marginal Way S	A-C / 17.0	D / 20.5	A-C / 17.0	D / 20.5
10	SR 99—N 145th St to N 80th St	F / 26.0	E / 19.0	F / 26.0	E / 19.0
11	SR 522—SR 523 to I-5	F / 31.0	D / 19.5	F / 31.0	D / 19.5
12	SR 99—N 80th St to Denny Way	E / 20.0	E / 20.0	E / 20.5	E / 20.0
13	Roosevelt Way NE / 12th Ave NE/Eastlake Ave—NE 75th St to Denny Way	E / 37.0	E / 38.5	E / 37.0	E / 39.0
14	25th Ave NE—NE 75th St to S Grand St	E / 47.0	E / 56.5	E / 47.5	E / 57.0
15	15th Ave/Elliott Ave—Market St to Denny Way	E / 24.5	A-C / 17.0	E / 24.5	A-C / 17.0
16	California Ave SW—SW Hanford St to SW Thistle St	D / 15.5	D / 17.0	D / 15.5	D / 17.0
17	1st Ave S—S Royal Brougham Way to E Marginal Way S	D / 17.0	E / 21.0	D / 17.0	E / 21.5
18	Rainier Ave S—E Yesler Way to Renton Ave S	D / 36.0	E / 53.0	D / 36.5	E / 53.5
19	MLK Jr Way S—Rainier Ave S to S Boeing Access Rd	A-C / 23.5	E / 33.5	A-C / 23.5	E / 33.5

Source: Google Maps, 2017; Fehr & Peers, 2017.

Level of Service

- A–C
- D
- E
- F

Source: City of Seattle, 2017; Seattle Department of Transportation, 2017; Fehr & Peers, 2017.



Exhibit 3.4–42 2035 Corridor Travel Times, Alternative 2

IMPACTS OF ALTERNATIVE 3

Metrics Used for Impact Identification

Screenlines

Exhibit 3.4–43 and Exhibit 3.4–31 summarize the projected PM peak hour volumes across each screenline in 2035. Similar to Alternative 2, Alternative 3 is expected to result in modest increases in traffic volumes across some screenlines compared to the no action alternative. The increased traffic results in a volume-to-capacity ratio increase of up to 0.03 depending on location. Alternative 3 is projected to result in volume-to-capacity ratios at least 0.01 higher than the no action alternative at the following screenlines:

- Screenline 4.11: South City Limit–Martin Luther King Jr. Way to Rainier Ave S in the southbound direction
- Screenline 5.11: Ship Canal–Ballard Bridge in the northbound direction
- Screenline 10.12: South of S Jackson St–12th Ave S to Lakeside Ave S in the southbound direction

Therefore, a potentially significant adverse impact is expected to automobile traffic, freight, and transit under Alternative 3.

Exhibit 3.4–43 2035 PM Peak Hour Screenline Volume-to-Capacity, Alternative 3

Screenline #	Screenline Location	LOS Standard	ALT. 1 NO ACTION (2035)		ALT. 3 (2035)	
			NB/EB	SB/WB	NB/EB	SB/WB
1.11	North City Limit—3rd Ave NW to Aurora Ave N	1.20	1.07	0.81	1.07	0.83
1.12	North City Limit—Meridian Ave N to 15th Ave NE	1.20	0.93	0.56	0.92	0.56
1.13	North City Limit—30th Ave NE to Lake City Way NE	1.20	1.14	0.78	1.14	0.78
2	Magnolia	1.00	0.54	0.64	0.54	0.66
3.11	Duamish River—West Seattle Bridge & Spokane St	1.20	0.68	1.13	0.69	1.15
3.12	Duamish River—1st Ave S & 16th Ave S	1.20	0.40	0.40	0.40	0.40
4.11	South City Limit—Martin Luther King Jr. Way to Rainier Ave S	1.00	0.63	1.05	0.66	1.08
4.12	South City Limit—Marine Dr SW to Meyers Way S	1.00	0.58	0.76	0.59	0.76
4.13	South City Limit—SR 99 to Airport Way S	1.00	0.46	0.81	0.48	0.81
5.11	Ship Canal—Ballard Bridge	1.20	1.27	0.74	1.29	0.75
5.12	Ship Canal—Fremont Bridge	1.20	0.97	0.80	0.98	0.81
5.13	Ship Canal—Aurora Bridge	1.20	0.95	0.84	0.97	0.85
5.16	Ship Canal—University & Montlake Bridges	1.20	0.97	1.03	1.00	1.05
6.11	South of NW 80th St—Seaview Ave NW to 15th Ave NW	1.00	0.48	0.47	0.48	0.47
6.12	South of N(W) 80th St—8th Ave NW to Greenwood Ave N	1.00	0.98	0.93	0.99	0.96
6.13	South of N(E) 80th St—Linden Ave N to 1st Ave NE	1.00	0.62	0.55	0.62	0.57
6.14	South of NE 80th St—5th Ave NE to 15th Ave NE	1.00	0.66	0.63	0.66	0.66
6.15	South of NE 80th St—20th Ave NE to Sand Point Way NE	1.00	0.62	0.55	0.62	0.57
7.11	West of Aurora Ave—Fremont Pl N to N 65th St	1.00	0.72	0.98	0.72	1.00
7.12	West of Aurora Ave—N 80th St to N 145th St	1.00	0.63	0.75	0.63	0.77
8	South of Lake Union	1.20	0.64	0.49	0.64	0.49
9.11	South of Spokane St—Beach Dr SW to W Marginal Way SW	1.00	0.48	0.67	0.50	0.67
9.12	South of Spokane St—E Marginal Way S to Airport Way S	1.00	0.64	0.72	0.65	0.72
9.13	South of Spokane St—15th Ave S to Rainier Ave S	1.00	0.61	0.91	0.62	0.91
10.11	South of S Jackson St—Alaskan Way S to 4th Ave S	1.00	0.63	0.82	0.63	0.82
10.12	South of S Jackson St—12th Ave S to Lakeside Ave S	1.00	0.83	1.01	0.84	1.02
12.12	East of CBD	1.20	0.39	0.45	0.39	0.46
13.11	East of I-5—NE Northgate Way to NE 145th St	1.00	0.74	0.74	0.74	0.76
13.12	East of I-5—NE 65th St to NE 80th St	1.00	0.61	0.63	0.61	0.65
13.13	East of I-5—NE Pacific St to NE Ravenna Blvd	1.00	0.80	0.75	0.81	0.77

Source: Fehr & Peers, 2017.

Mode Share

As shown in Exhibit 3.4–44, Alternative 3 is expected to have the same SOV mode share as Alternative 1 for all sectors and all sectors are expected to meet the 2035 SOV targets. Therefore, no mode share impacts are expected under Alternative 3.

Exhibit 3.4–44 2035 PM Peak Period Mode Share by Sector (Percentage), Alternative 3

Sector	SOV Target (2035)	Alternative 1 No Action (2035)	Alternative 3 (2035)
Northwest Seattle	37	36	36
Northeast Seattle	35	34	34
Queen Anne/Magnolia	38	37	37
Downtown/Lake Union	18	17	17
Capitol Hill/Central District	28	28	28
West Seattle	35	35	35
Duwamish	51	51	51
Southeast Seattle	38	38	38

Note: Fehr & Peers, 2017.

Transit Daily Boardings

The project model forecasts a 79 percent increase beyond existing transit boardings in Seattle under Alternative 3. Because this is lower than the 80 percent significance threshold, no impact is identified. Again, this is a conservative assessment because much of the increase would occur on light rail while the threshold is based on bus boardings only.

For informational purposes, crowding ratios were also forecasted along the ten BRT routes within the city, as shown in Exhibit 3.4–45. The results indicate that conditions along many routes would be similar to the no action alternative where some transit trips would operate with standing room only and be unable to accommodate all passengers resulting in skipped stops. Others would have ridership growth beyond the crowding thresholds; ~~however, transit rider loads would increase on several of the routes.~~ The largest transit rider increases would occur on RR 2 between West Seattle and Downtown, RR 5 between Ballard and UW, RR 6 between Northgate, Ballard and Westlake, and RR7 between Northgate, Roosevelt, Eastlake, and Downtown.

Exhibit 3.4–45 2035 Transit Crowding Ratio, Alternative 3

BRT Route	PASSENGER LOAD TO CROWD THRESHOLD RATIO		
	Alternative 1 No Action (2035)	Alternative 3 (2035)	Additional Riders per Peak Hour Trip
C Line—West Seattle/Downtown	0.75	0.77	2
D Line—Ballard/Downtown	0.51	0.51	0
E Line—Aurora/Downtown	0.89	0.89	0
RR 1 (Route 12)—Madison	0.49	0.50	1
RR 2 (Route 120)—West Seattle/Downtown	1.06	1.11	3
RR 3 (Route 7)—Mt Baker/Downtown	0.30	0.31	1
RR 4 (Route 7 / 48)—Rainier/23rd Ave	0.30	0.30	0
RR 5 (Route 44)—Ballard/45th/UW	0.91	0.97	5
RR 6 (Route 40)—Northgate/Ballard/Westlake	1.45	1.59	12
RR 7 (Route 70)—Northgate/Roosevelt/Eastlake/Downtown	1.03	1.10	5

Note: King County Metro, Fehr & Peers, 2017.

Note that the transit assumptions in the model are only estimates of the future year routes, stops, and headways that will be in place. In practice, King County Metro continually adjusts its service planning to accommodate demand on the busiest corridors. Therefore, while crowding would likely occur on some routes, Metro's overall plans for increased service hours and boardings are in line with the increase in boardings expected under Alternative 3.

Other Metrics

State Facilities

Exhibit 3.4–46 summarizes 2035 conditions on the state facilities not included in the screenline analysis. Bold cells indicate that the v/c ratio is over 1.0 meaning the facility would not meet WSDOT's LOS standard in 2035.

Exhibit 3.4–46 State Facility Analysis—2035 Volume-to-LOS D Capacity Ratio, Alternative 3

State Facility	Location	Alt. 1 No Action (2035)	Alt. 3 (2035)
I-5	North of NE Northgate Way	1.22	1.22
I-5	Ship Canal Bridge	1.39	1.41
I-5	North of West Seattle Bridge	1.35	1.35
I-5	North of Boeing Access Rd	1.23	1.23
I-90	East of Rainier Ave S	1.34	1.35
SR 509	Between S 112th St and Cloverdale St	0.84	0.84
SR 519	West of 4th Ave	0.99	0.99
SR 520	Lake Washington Bridge	1.10	1.13

Note: Forecasted average daily traffic volumes do not include express lane volumes on I-5 and I-90.

Source: WSDOT, 2015; Fehr & Peers, 2017.

With the increase in traffic associated with Alternative 3, six study segments are expected to exceed WSDOT's LOS D standard.

Note that the difference in the v/c ratios between the no action alternative and Alternative 3 is very small, no more than 0.03 v/c. The largest differences are projected to occur along the I-5 Ship Canal Bridge and the SR 520 Lake Washington Bridge. Daily traffic fluctuations tend to be of this magnitude or larger and this difference may not be noticed by drivers.

Travel Time

Exhibit 3.4–47 and Exhibit 3.4–48 summarize 2035 auto travel times along 19 corridors for Alternative 3 compared to the no action alternative. Again, these results are relevant for freight operations which travel in the same lanes as auto traffic. However, traffic congestion is more difficult for freight to navigate, and trucks typically travel at slower speeds than

general auto traffic. As with Alternative 2, the travel time increases under Alternative 3 are expected to be minimal compared to the no action alternative. All increases are expected to be no more than one minute.

Exhibit 3.4–47 2035 Corridor Travel Times, Alternative 3

Corridor ID	Study Facility	ALT. 1 NO ACTION (2035) LOS/Minutes		ALT. 3 (2035) LOS/Minutes	
		NB / EB	SB / WB	NB / EB	SB / WB
1	N 105th St—Greenwood Ave N to SR 522	D / 18.0	E / 20.5	D / 18.0	E / 20.5
2	NW 85th—32nd Ave NW to Greenwood Ave N	E / 13.0	D / 11.5	E / 13.0	D / 11.5
3	NW 85th St—Greenwood Ave N to SR 522	E / 12.0	F / 16.0	E / 12.0	F / 16.0
4	NW Market St—24th Ave NW to Stone Way N	E / 19.5	F / 22.5	E / 19.5	F / 22.5
5	N 45th St—Stone Way N to 25th Ave NE	E / 19.0	E / 19.5	E / 19.5	F / 20.0
6	E Madison St—I-5 to 23rd Ave	E / 15.5	E / 15.5	E / 15.5	E / 15.5
7	West Seattle Bridge—35th Ave SW to I-5	D / 9.0	F / 15.0	D / 9.0	F / 15.5
8	Swift Ave S—S Graham St to Seward Park Ave S	A-C / 10.5	A-C / 10.0	A-C / 10.5	A-C / 10.0
9	SW Roxbury St—35th Ave SW to E Marginal Way S	A-C / 17.0	D / 20.5	A-C / 17.0	D / 20.5
10	SR 99—N 145th St to N 80th St	F / 26.0	E / 19.0	F / 26.0	E / 19.0
11	SR 522—SR 523 to I-5	F / 31.0	D / 19.5	F / 31.0	D / 19.5
12	SR 99—N 80th St to Denny Way	E / 20.0	E / 20.0	E / 21.0	E / 20.0
13	Roosevelt Way NE / 12th Ave NE/Eastlake Ave—NE 75th St to Denny Way	E / 37.0	E / 38.5	E / 37.5	E / 39.0
14	25th Ave NE—NE 75th St to S Grand St	E / 47.0	E / 56.5	E / 47.5	E / 57.5
15	15th Ave/Elliott Ave—Market St to Denny Way	E / 24.5	A-C / 17.0	E / 25.0	A-C / 17.0
16	California Ave SW—SW Hanford St to SW Thistle St	D / 15.5	D / 17.0	D / 15.5	D / 17.0
17	1st Ave S—S Royal Brougham Way to E Marginal Way S	D / 17.0	E / 21.0	D / 17.0	E / 21.0
18	Rainier Ave S—E Yesler Way to Renton Ave S	D / 36.0	E / 53.0	D / 36.5	E / 53.5
19	MLK Jr Way S—Rainier Ave S to S Boeing Access Rd	A-C / 23.5	E / 33.5	A-C / 23.5	E / 33.5

Source: Google Maps, 2017; Fehr & Peers, 2017.



Exhibit 3.4-48 2035 Corridor Travel Times, Alternative 3

New to the FEIS

Impacts of the Preferred Alternative is a new section since issuance of the DEIS

IMPACTS OF THE PREFERRED ALTERNATIVE

Within most urban villages, the estimated growth under the Preferred Alternative falls within the range, or very near the range, of the growth studied in the DEIS alternatives. The exceptions are the land use growth in the Madison-Miller Urban Village and the First Hill-Capitol Hill Urban Village. Under the Preferred Alternative, the Madison-Miller Urban Village is expected to have 45 more households and 23 more jobs than the closest DEIS alternative (Alternative 3). The First Hill-Capitol Hill Urban Village would have 2,186 fewer households and 501 more jobs than the closest DEIS alternative (Alternative 2).

Metrics Used for Impact Identification

Screenlines

Because the planned land use growth for most urban villages under the Preferred Alternative falls within the range of land use growth assumed under the DEIS alternatives, the screenline results would be within the ranges reported for Alternatives 1 (No Action), 2, or 3.

Screenline v/c ratios at least 0.01 higher than the No Action alternative, which results in a potentially significant impact, are expected at the following screenlines.

- Screenline 4.11: South City Limit–Martin Luther King Jr. Way to Rainier Ave S in the southbound direction
- Screenline 5.11: Ship Canal–Ballard Bridge in the northbound direction
- Screenline 10.12: South of S Jackson St–12th Ave S to Lakeside Ave S in the southbound direction

The locations where the planned land use growth was distinctly different or higher than the other alternatives include Madison-Miller and the First Hill-Capitol Hill urban village. Under the Preferred Alternative, the Madison-Miller area would generate an additional 100 PM peak hour vehicle trips to or from this area compared to Alternative 3. The First Hill-Capitol Hill urban village would have an additional 200 PM peak hour vehicle trips to or from the area compared to Alternative 2.

The screenlines most likely to be affected by the additional trips from the Preferred Alternative were similar to Alternatives 2 and 3. Screenline 10.12, was already identified as an impact under the DEIS action alternatives. The v/c ratio would be slightly higher under the Preferred

Alternative. The other two adjacent screenlines (5.16-University and Montlake Bridges to the north and 12.12-East of CBD to the west) are both well under their thresholds and therefore the additional trips are not expected to cause an impact at those screenlines.

Mode Share

The change in mode share by sector varied by less than one percentage point between all DEIS alternatives. As the expected growth under the Preferred Alternative is very close to the ranges assumed in action alternatives, the SOV mode shares would not change meaningfully change compared to the DEIS alternatives and no significant impacts are expected under the Preferred Alternative.

Transit Daily Boardings

Citywide, the Preferred Alternative plans for 470 fewer households than Alternative 3 and 620 more jobs than Alternative 2. The significance threshold of an 80 percent increase over existing daily boardings is equivalent to a growth of 60,950 transit boardings from the base year over the three-hour AM period. This allows for an additional 170 AM peak hour boardings compared to Alternative 3 (the action alternative with the highest transit boardings) before reaching the threshold.

While transit boardings under the Preferred Alternative would be marginally higher than the alternatives studied in the DEIS, they are not expected to exceed the 80 percent threshold. Moreover, as stated previously, the daily transit boarding increases cited in this document include light rail while the threshold is based on bus boardings only. Therefore, this is a conservative assessment and the Preferred Alternative is not expected to result in a significant transit impact.

For informational purposes, the transit line crowding ratios for the planned BRT routes throughout the City were analyzed. The results are expected to be similar to results for Alternatives 2 and 3. The Madison-Miller and First Hill-Capitol Hill area may have a few more transit riders on the nearby routes RR 1 and RR 4 compared to Alternatives 2 and 3, however these routes are still not expected to have crowding issues as the crowding threshold ratio is expected to be less than 0.5. The identified crowding issues under Alternative 2 and 3 (RR 2, RR 6 and RR 7) are expected to occur under the Preferred Alternative.

Other Metrics

State Facilities

As the total household and jobs growth under the Preferred Alternative is very similar to the total planned growth under Alternatives 2 and 3, the state facility volume-to-LOS D capacity ratios are not expected to meaningfully change. The same six state facilities that would exceed WSDOT's LOS D threshold in Alternatives 2 and 3 would also do so under the Preferred Alternative.

Corridor Travel Times

The corridor travel times under the Preferred Alternative are not expected to meaningfully differ from the range of forecasted travel times for Alternatives 2 and 3. Corridor travel times would increase by a negligible amount; with none adding enough travel time to push any corridors beyond the one minute threshold increase compared to the No Action alternative.

SUMMARY OF IMPACTS

Exhibit 3.4–49 summarizes the impacts for each alternative. Note that the table only includes the metrics used for impact identification.

Exhibit 3.4–49 Summary of Transportation Impacts

Sector	Alternative 1 No Action (2035)	Alternative 2 (2035)	Alternative 3 (2035)	<u>Preferred Alternative (2035)</u>
Screenline (Auto, Freight, and Transit)	Potentially	Potentially	Potentially	<u>Potentially</u>
Mode Share	No	No	No	<u>No</u>
Transit Daily Boardings	No	No	No	<u>No</u>
Pedestrian and Bicycle	No	No	No	<u>No</u>
Safety	No	No	No	<u>No</u>
Parking	Yes	Yes	Yes	<u>Yes</u>

Note: Fehr & Peers, 2017.

3.4.3 MITIGATION MEASURES

Seattle is committed to investing in the City's transportation system to improve access and mobility for residents and workers and to reduce the potential severity of transportation impacts identified above. Reducing the share of SOV travel is key to Seattle's transportation strategy. Lower SOV mode share would not only reduce screenline and parking demand impacts; it is consistent with numerous other goals and policies in the Comprehensive Plan. From a policy perspective, the City has prioritized reducing vehicular demand rather than increasing operating capacity.

This section identifies a range of potential mitigation strategies that could be implemented to help reduce the severity of the adverse impacts identified in the previous section. These include impacts that would affect screenlines and parking.

INCORPORATED PLAN FEATURES

The City of Seattle is currently working on numerous strategies to support non-SOV travel modes and this increase the overall efficiency of the transportation system for all Seattle residents and employees. These strategies would be executed regardless of which land use alternative is chosen and are therefore incorporated into all three alternatives.

- **Improving the Pedestrian and Bicycle Network:** The City has developed a citywide Pedestrian Master Plan (PMP) and citywide Bicycle Master Plan (BMP) along with other subarea plans focused on particular neighborhoods. These plans and documents include myriad projects that, if implemented, would improve the pedestrian and bicycle environment. SDOT also has ongoing safety programs that are aimed at reducing the number of collisions, benefiting both safety and reliability of the transportation system.
- **Implementing Transit Speed and Reliability Improvements:** The Seattle Transit Master Plan (TMP) has identified numerous projects, including Intelligent Transportation Systems (ITS), to improve transit speed and reliability throughout the city.
- **Implementing Actions Identified in the Freight Master Plan:** The City is recently prepared a revised Freight Master Plan, including measures to increase freight accessibility and travel time reliability. These projects could be implemented on key freight corridors to improve conditions for goods movement.
- **Expanding Travel Demand Management and Parking Strategies:** Managing demand for auto travel is an important element of reducing

overall congestion impacts that affect auto, freight, transit and parking demand. There are well-established travel demand management programs in place, including Transportation Management Programs (TMPs) and the State's Commute Trip Reduction (CTR) program which could be expanded to include new parking-related strategies. CTR and TMP programs could evolve substantially toward smaller employer, residential buildings and other strategies (CTR and TMPs are now largely focused on large employers).

- **Expanding Parking Strategies:** The City has several ongoing programs to manage on-street parking including the Community Access and Parking Program, Performance-Based Parking Program, and Restricted Parking Zone Program. These approaches could be modified and/or applied at the neighborhood level to manage the increased demand for the City's limited parking supply.
- **Working With Partner Agencies:** WSDOT, King County Metro, Sound Transit and PSRC all provide important transportation investments and facilities for the City of Seattle. The City has a long history of working with these partner agencies to expand multimodal access to and within the City. The City should continue to work with these agencies. Key issue areas include regional roadway pricing and increased funding for transit operations.

The incorporated transportation improvement features are discussed in more detail below. It should be noted that some projects could have secondary impacts. For example, converting a general purpose travel lane to a transit lane or a cycle track would reduce capacity for autos. As required, the City would prepare additional analysis before implementing specific transportation improvement projects. Given the programmatic nature of this study, this EIS simply lists the types of projects that could be considered to mitigate potential secondary impacts.

Pedestrian and Bicycle System Improvements

Improvements to the pedestrian and bicycle system would provide a better connected and safer walking and riding environment, thereby encouraging travelers to choose walking or biking rather than driving. There is a well-documented link between improved, safer bicycle and pedestrian accessibility and reduced demand for vehicle travel (CAPCOA 2010).

- Specific projects and/or high priority areas for improvement may be found in the City's adopted Pedestrian and Bicycle Master Plans.

- Development codes could also be modified to include requirements for wider sidewalks, particularly along greenways and green streets, to promote walking and bicycling.
- In conjunction with other funding sources, new private and public development could pay for a share of PMP and BMP improvements.

Speed and Reliability Improvements

Transit and freight travel times could be reduced by providing targeted speed and reliability improvements on key routes frequented by transit and freight. The *Transit Master Plan* identifies such improvements throughout the city. The City's Freight Master Plan identifies near- and long-term improvements that would benefit freight mobility. In conjunction with other funding sources, new development could pay for a share of improvements on key routes. Some of the transit improvements could be funded through the passage of 2014's Proposition 1 or similar future funding measures.

Travel Demand Management and Parking Strategies

The City of Seattle currently has travel demand management programs in place including strategies outlined in the transportation modal plans: the Pedestrian Master Plan, the Bicycle Master Plan and the Transit Master Plan. In addition, the City could consider enhancing the travel demand management programs already in place. Research by the California Air Pollution Control Officers Association (CAPCOA), which is composed of air quality management districts in that state, has shown that implementation of travel demand management programs can substantially reduce vehicle trip generation, which in turn reduces congestion for transit, freight and autos. Reduced auto travel can indirectly mitigate on-street parking impacts; in addition, some residents may choose to forgo owning private vehicles. The specific measures described below are all potential projects that the City could consider to modify or expand current strategies:

- Parking maximums that would limit the number of parking spaces which can be built with new development.
- Review the parking minimums currently in place for possible revisions.
- Review on-street parking management strategies in concert with any adjustment to off-street parking standards to reduce the impact of spillover parking.

- Unbundling of parking to separate parking costs from total property cost, allowing buyers or tenants to forgo buying or leasing parking spaces.
- Increased parking taxes/fees.
- Review and revise transit pass provision programs for employees.
- Encourage or require transit pass provision programs for residents—King County Metro has a Passport program for multifamily housing that is similar to its employer-based Passport program. The program discounts transit passes purchased in bulk for residences of multifamily properties.

~~The City could also consider encouraging or requiring parking operators to upgrade their parking revenue control systems (PARC) to the latest hardware and software technology so it could be incorporated into an electronic guidance system, compatible with the e-Park program that is currently operating Downtown. This technology would help direct drivers to off-street parking facilities with available capacity. The City could also continue to manage on-street paid parking through existing programs and refine them to redefine subareas and manage them with time-of-day pricing and paid parking to new areas.~~

~~In the absence of a new ITS parking program, the City is expected to continue managing on-street paid parking through SDOT's Performance-Based Parking Program which evaluates data to determine if parking rates, hours of operation and/or time limits could be adjusted to achieve the City's goal of one to two available spaces per block face throughout the day.~~

The City could also consider establishing new subarea transportation management partnership organizations to provide programs, services and strategies to improve access to employment and residences while decreasing the SOV rate, particularly during peak periods. This could include partnerships with transit providers. Local Transportation Management Associations (TMAs) could provide some of these services. Programs like the state's Growth and Transportation Efficiency Center (GTEC) or the City's Business Improvement Area (BIA) are possible models for future funding sources. The programs could include features of relevant programs such as Seattle Center City's Commute Seattle, Whatcom County's SmartTrip or Tacoma's Downtown on the Go programs.

The City could consider updating municipal code and/or Director's Rules related to Transportation Management Plans required for large buildings to include transportation demand management measures that are most

effective in reaching the City's mode share goals. This may include membership in a TMA and discounted or free transit passes and/or car share and bike share memberships. For residential buildings, the City could also consider extending Transportation Management Plans or requiring travel options programs (such as Green Trips in Oakland, CA and Residential Services in Arlington, VA).

~~The City could seek to improve monitoring of the parking occupancy and RPZs to determine if changes are necessary. These changes could include splitting existing RPZs into multiple zones, adding new RPZs or adjusting RPZ boundaries. The City could also review the RPZ program and its policies in areas that are oversubscribed (where there are more permits issued than parking spaces).~~

Parking Strategies

The City has several ongoing programs aimed at managing its on-street parking supply. Those programs and strategies are described here and could be used to manage the increased demand expected under the Action Alternatives.

SDOT's Community Access and Parking Program works with community members to identify parking challenges and opportunities within a neighborhood and implement changes. Parking recommendations could include new time-limit signs, load zones, paid parking, restricted parking zones, bicycles parking, or other changes.

The City is expected to continue managing on-street paid parking through SDOT's Performance-Based Parking Program which evaluates data to determine if parking rates, hours of operation and/or time limits could be adjusted to achieve the City's goal of one to two available spaces per block face throughout the day. The City could continue to manage on-street paid parking through existing programs and refine them to redefine subareas and manage them with time-of-day pricing and paid parking to new areas.

The City could also consider encouraging or requiring parking operators to upgrade their parking revenue control systems (PARC) to the latest hardware and software technology so it could be incorporated into an electronic guidance system, compatible with the e-Park program that is currently operating Downtown. This technology would help direct drivers to off-street parking facilities with available capacity.

Additionally, the City could seek to improve monitoring of the parking occupancy and RPZs to determine if changes are necessary. These

New to the FEIS

Parking Strategies is a new section since issuance of the DEIS

New to the FEIS

Intelligent Transportation Systems is a new section since issuance of the DEIS

changes could include splitting existing RPZs into multiple zones, adding new RPZs or adjusting RPZ boundaries. The City could also review the RPZ program and its policies in areas that are oversubscribed (where there are more permits issued than parking spaces) to limit the number of permits issued.

Intelligent Transportation Systems

Seattle has an ongoing program to improve the operations of traffic signals and provide drivers with more information about congestion and travel times in an effort to make more efficient use of the City's streets. The City will continue to implement new traffic signal systems, such as the recently introduced adaptive signal control strategy for the Mercer Street Corridor throughout the City. These programs are designed to specifically reduce traffic congestion and improve freight and vehicle flow.

Potential Mitigation Measure Implementation

Funding for mitigation projects could come from a variety of sources. One way to generate additional funding would be a citywide development impact fee program that could include monitoring, project prioritization and use of collected fees to construct street system projects. The program could emulate practices used in the existing South Lake Union and Northgate Voluntary Impact Fee Programs. This type of program would require additional analysis to identify needed projects and a fee schedule before it could be implemented. Most cities in Washington State have a transportation impact fee program to fund transportation capacity projects.

OTHER PROPOSED MITIGATION MEASURES

Potential mitigation measures for the three potential screenline impacts are discussed here:

Screenline 4.11—South City Limit from Martin Luther King Jr. Way to Rainier Ave S

Screenline 4.11 along the south city limit from Martin Luther King Jr. Way to Rainier Ave S is expected to potentially exceed its threshold under the no action alternative and both action alternatives. The following mitigation measures could be implemented to reduce the significance of this potential impact:

- Purchase additional bus service from King County Metro along affected corridors.

- Strengthen TDM requirements for new development to reduce SOV trips, specifically in areas in the Rainier Valley.
- Increase the screenline threshold from 1.0 to 1.2 to acknowledge the City is willing to accept higher congestion levels in this area. A screenline threshold of 1.2 is consistent with other higher density areas of the city.

Screenline 5.11—Ballard Bridge

Screenline 5.11 across the Ballard Bridge is expected to potentially exceed its threshold under the no action alternative and both action alternatives. The following specific mitigation measures could be implemented to reduce the significance of this potential impact:

- 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.
- Purchase additional bus service from King County Metro along the 15th Ave NW corridor.
- Strengthen TDM requirements for new development to reduce SOV trips, particularly in the Ballard, Crown Hill, and Greenwood urban villages.

Screenline 10.12—South of S Jackson St from 12th Ave S to Lakeside Ave S

Screenline 10.12 along S Jackson Street from 12th Ave S to Lakeside Ave S is expected to potentially exceed its threshold under the no action alternative and both action alternatives. The following mitigation measures could be implemented to reduce the significance of this potential impact:

- Purchase additional bus service from King County Metro along affected corridors.
- Strengthen TDM requirements for new development to reduce SOV trips, particularly in the Capitol Hill, First Hill, and Central District areas.
- Increase the screenline threshold from 1.0 to 1.2 to acknowledge the City is willing to accept higher congestion levels in this area. A screenline threshold of 1.2 is consistent with other higher density areas of the city.

3.4.4 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Travel demand and associated congestion is expected to increase over time regardless of the alternative pursued. In addition to citywide transportation capacity improvements that are largely focused on improved transit, bicycle, pedestrian, and freight connections, the City will manage demand using policies, programs, and investments aimed at shifting travel to non-SOV modes. Seattle will also continue to invest in Intelligent Transportation Systems to improve the operations of streets for vehicles and freight. However, city streets will remain congested during peak periods as growth continues to occur. With respect to the ~~three~~ three action alternatives studied in the DEIS and this Draft Final EIS, potentially significant adverse impacts are identified for screenline volumes and 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 in 3.4.3 Mitigation Measures. While there may be short-term impacts as individual developments are completed (causing on-street parking demand to exceed supply), it is expected that over the long term with expanded paid parking zones, revised RPZ permitting, more sophisticated parking availability metrics, and continued expansion of non-auto travel options, the on-street parking situation will reach a new equilibrium. Therefore, no significant unavoidable adverse impacts to parking are expected.

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 brought to a less-than-significant level. Therefore, no significant unavoidable impacts to screenlines are expected.

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.

3.5



HISTORIC RESOURCES.

This chapter provides analysis of potential impacts to historic resources and cultural resources in the study area. Historic and cultural resources exist belowground and aboveground and can be archaeological sites, buildings, structures, or objects. Historic and cultural resources can be designated/ listed, recommended eligible for listing, or determined eligible for listing on federal or local historic registers. Historic and cultural resources that are not listed or lack eligibility recommendation and determination can be qualified for consideration of their potential historic significance due to their age. In the City of Seattle, the minimum age threshold for a property to be considered historic is 25 years.

3.5.1 AFFECTED ENVIRONMENT

This section provides an overview of the study area's historic resources. Although it is recognized that each neighborhood in the study area has its own unique history and associated historic resources, it is not possible to provide a detailed history of each neighborhood within the citywide study area in a programmatic EIS of this scale. In addition to the fact that a more general level of detail is appropriate for a programmatic EIS, much of the information that would be required to provide a site-specific analysis is not available. The history of the study area provided here relies upon existing neighborhood-specific historic context statements, as available. The City has not conducted historic surveys or prepared historic context statements for all neighborhoods within the study area.

As a result, this section presents a broad discussion of the study area, focusing on the historic pattern of growth within Seattle as a whole, in order to provide indications of which urban villages have a higher likelihood to contain the oldest historic resources. While all urban villages contain resources that meet the minimum age threshold for consideration as a local landmark (25 years) or for listing in the National Register of Historic Places (50 years), older historic resources are more frequently eligible for listing on a

historic register due to rarity or associations with early Seattle residents and development. Beyond age, all of the urban villages likely contain resources that are associated with marginalized or under-represented 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, for example the 23rd & Union–Jackson and Columbia City areas. Other areas, such as Licton Springs, have associations with the Duwamish people. Additionally, subsurface archaeological resources associated with Native American tribes and the history of Seattle exist throughout the study area and it is likely that additional archaeological resources exist that have not yet been identified.

Since first incorporated in 1869, Seattle has expanded over time through charter amendments and annexation (City of Seattle, 1986; Phelps, 1978). The historic pattern of development within the study area has generally been outward from the Central Business District, with the earliest neighborhoods developing in chartered expansion areas. These areas contain today's First Hill-Capitol Hill, 23rd & Union-Jackson, Eastlake, and Madison-Miller urban villages, which were added between 1869 and 1886.

By the 1890s, numerous small neighborhoods had formed outside of downtown, located along transportation routes and near commercial sites such as lumber mills (US Geological Survey, 1895). Following the establishment of a street car system, areas once considered remote became accessible and were soon platted for residential development. The City's first annexation occurred in 1891 when seven of today's designated urban villages were incorporated into city limits: Greenwood-Phinney Ridge, Fremont, Green Lake, Roosevelt, Upper Queen Anne, Wallingford, and University Community. In 1907 eleven more urban villages in the study area were annexed: Ballard, Ravenna, Columbia City, North Beacon Hill, North Rainier, Rainier Beach, South Park, and all of West Seattle (now the Admiral, Morgan Junction, and Westwood-Highland Park urban villages). Later annexations occurred in 1910, the 1940s, the 1950s, 1978, and 1986. The most recently annexed urban villages in the study area are Aurora-Licton Springs, Bitter Lake Village, Crown Hill, Northgate, and Lake City, all of which were annexed in the 1950s.

Some of Seattle's historic building fabric has been preserved through creation of historic districts. The City of Seattle's Historic Preservation Program manages eight designated Seattle historic districts: Ballard Avenue, Columbia City, Fort Lawton, Harvard-Belmont, International District, Pike Place Market, Pioneer Square, and Sand Point. These

districts overlap with the study area urban villages of Ballard, Columbia City, and First Hill-Capitol Hill. Proposed expansion areas are abutting the boundaries of Ballard Avenue, Columbia City, Harvard-Belmont, and Sand Point historic districts. The study area also contains individual historic properties that are designated Seattle Landmarks. These are located throughout the study area. However, not all properties within the study area have been systematically inventoried for their potential eligibility. Therefore, it is likely that the study area contains additional properties that could meet the criteria for designation as a Seattle Landmark.

There are seven National Register historic districts within the Urban Villages or proposed expansions areas. These are Ballard Avenue Historic District, Naval Air Station (Sand Point), Chittenden Locks and Lake Washington Ship Canal, Montlake Historic District, Lake Washington Boulevard, Harvard-Belmont District, and the Columbia City Historic District. There are additional National Register historic districts abutting the study area. The study area also contains historic properties that are listed in, and that have been determined eligible for listing in, the National Register of Historic Places (NRHP). ~~P-There are 111 properties that have been determined eligible; are show below in Exhibit 3.5-1 provides counts of these by urban village and Exhibit 3.5-2. These properties are located throughout the study area but occur mostly in the Low Displacement/ High Access and High Displacement/High Access urban villages, specifically Eastlake, First Hill-Capitol Hill, and Roosevelt. Some urban villages do not contain any determined eligible properties.~~ It is important to note that not all properties within the study area have been systematically inventoried for their potential eligibility. Therefore, it is likely that the study area contains additional properties that meet the criteria for being determined eligible for listing in the NRHP, but which have not yet been inventoried. ~~Alternative 2 and 3 contain nearly the same amount of total determined eligible properties, however the distribution of these among the urban village categories and proposed rezoning tiers differ by alternative.~~

The City had, until recently, an ongoing effort to conduct historic resource surveys by neighborhood and class of building and results are available in a City-managed database. Survey efforts began in the 1970s but were not systematically conducted until the 2000s. Currently, 11 neighborhoods in the study area have been systematically inventoried. In addition, a systematic survey has been completed of neighborhood commercial districts (Sheridan, 2002), residential properties built before 1906 (Lange and Veith, 2009), and City-owned properties (Wickwire, 2001) in the study area. These surveys added buildings to the database

Exhibit 3.5–1 NHRP Determined Eligible Historic Properties by Typology and Urban Village

New to the FEIS

FEIS Exhibit 3.5–1
combines DEIS
Exhibits 3.5–1 and
3.5–2, and is new
since issuance
of the DEIS

Urban Village	Number of Resources Determined Eligible for listing in the National Register of Historic Places
High Displacement Risk & Low Access to Opportunity	
Bitter Lake Village	2
Othello	0
Rainier Beach	0
South Park	1
Westwood-Highland Park	0
Subtotal: 3	
Low Displacement Risk & High Access to Opportunity	
Admiral	0
Ballard	2
Crown Hill	0
Eastlake	18
Fremont	0
Green Lake	1
Greenwood- Phinney Ridge	2
Madison-Miller	2
Ravenna	0
Roosevelt	23
Upper Queen Anne	2
Wallingford	0
West Seattle Junction	0
Subtotal: 50	
High Displacement Risk & High Access to Opportunity	
23rd & Union-Jackson	3
Columbia City	4
First Hill-Capitol Hill	45
Lake City	0
North Beacon Hill	0
North Rainier	2
Northgate	1
Subtotal: 55	
Low Displacement Risk & Low Access to Opportunity	
Aurora-Licton Springs	0
Morgan Junction	3
Subtotal: 3	

Source: ESA, 2017.

from all of the urban villages in the study area with the exception of Lake City. While nearly all urban villages have properties listed in the database, 17 of the neighborhoods have yet to be systematically inventoried (Exhibit 3.5–4).

All of the study area urban villages and proposed expansion areas have been subject to redevelopment since their initial establishment. Some neighborhoods have changed more than others, such as First Hill which was composed of exclusive single-family residences during the 19th century and now features a mix of multi-family residences and commercial buildings (Nyberg and Steinbrueck, 1975). Other neighborhoods still retain aspects of their historic fabric such as Wallingford, which was noted to contain one of the City's best examples of the early twentieth century Craftsman bungalow neighborhoods (Sheridan, 2002). The completeness of the historic fabric for many of the urban village neighborhoods is discussed in the survey of neighborhood commercial buildings (Sheridan, 2002).

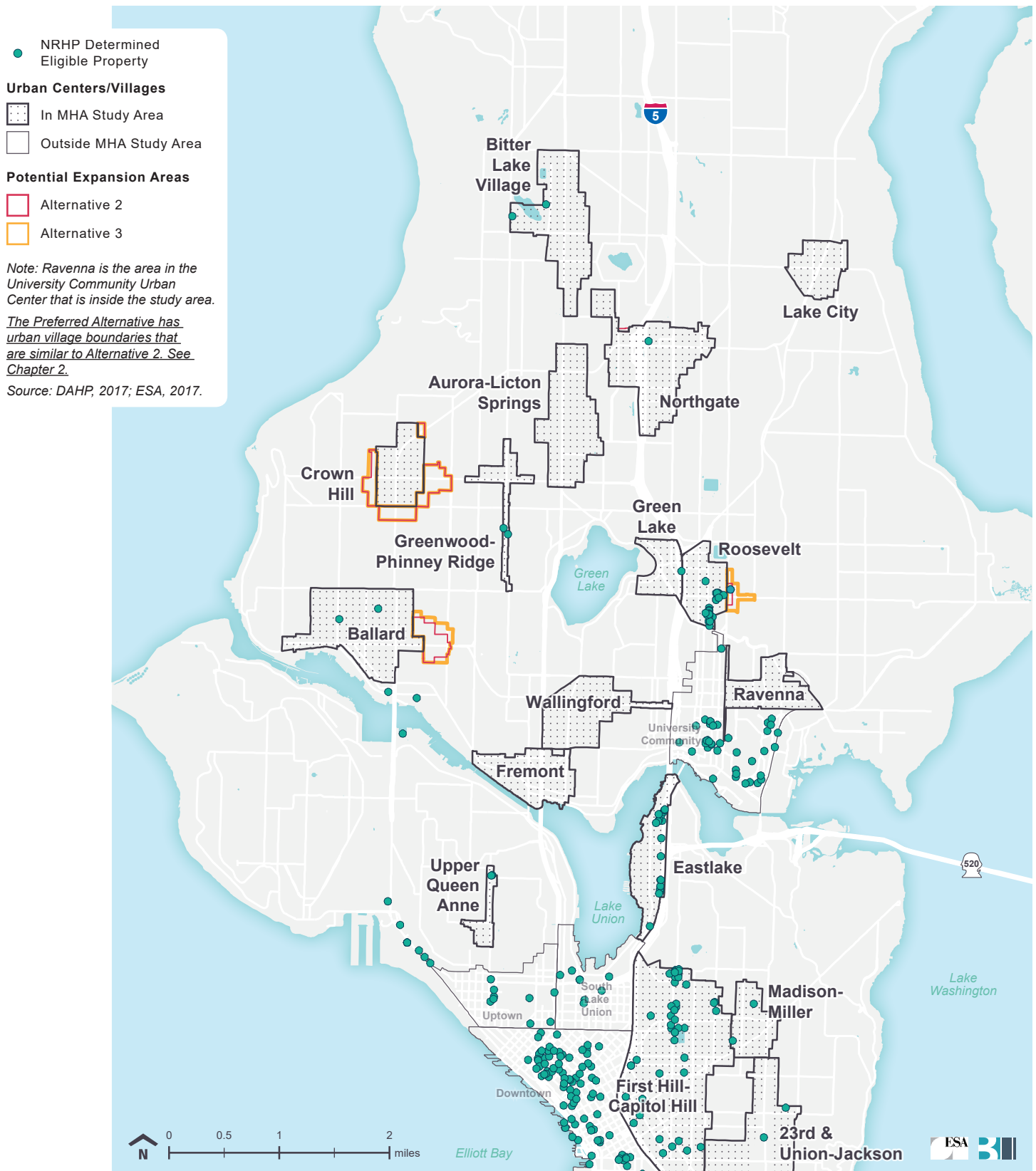


Exhibit 3.5-2 NRHP Determined Eligible Properties—North

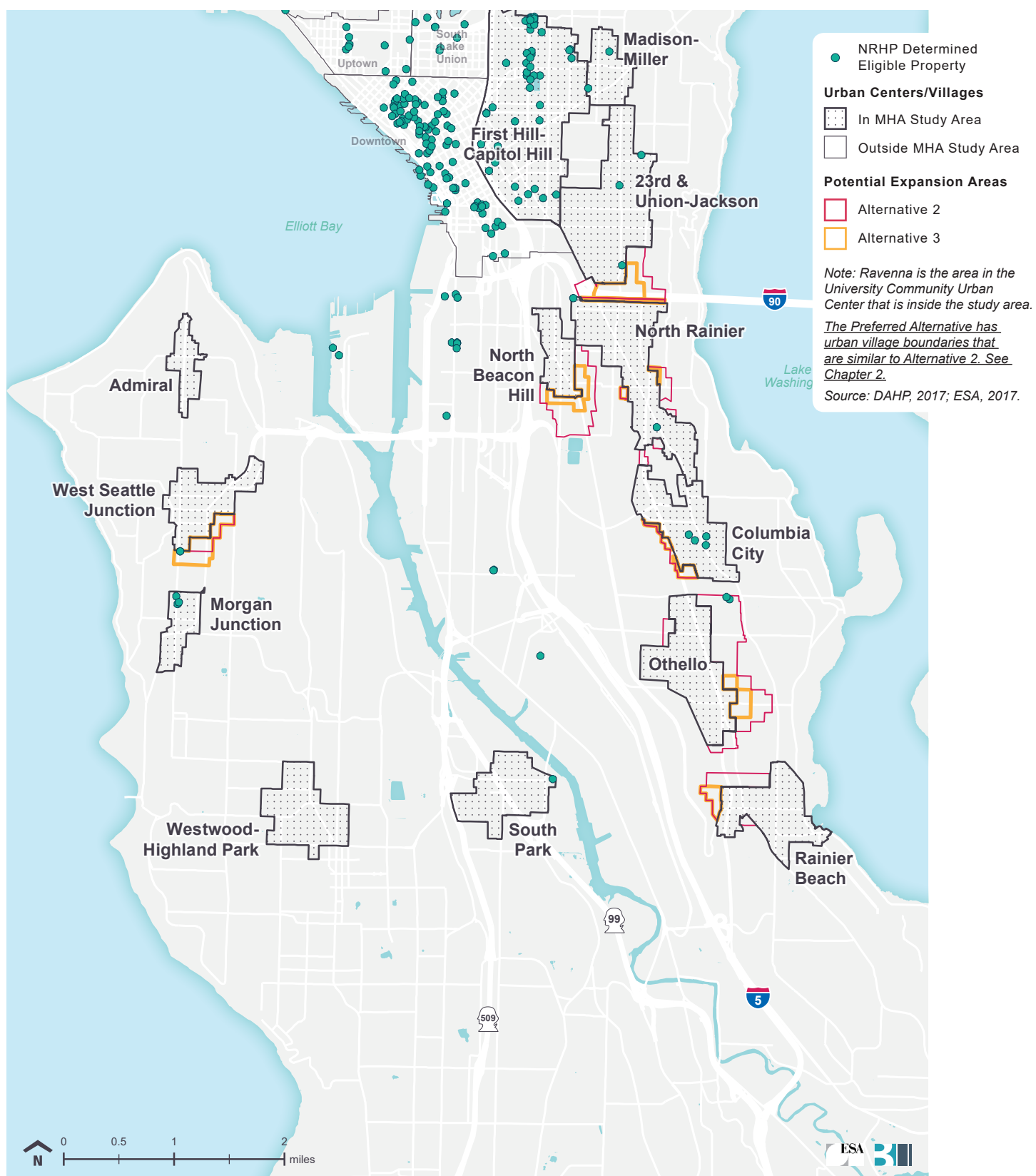


Exhibit 3.5-3 NRHP Determined Eligible Properties—South

Exhibit 3.5–4 Historic Resources Survey Status

Urban Village	Properties Listed in <u>City</u> Historic Resources Survey Database	Systematic Inventory Conducted	Historic Context Statement Prepared
23rd & Union-Jackson	X	X (part of Central Area Survey)	X
Admiral	X	—	
Aurora-Licton Springs	X	—	
Ballard	X	—	
Bitter Lake Village	X	—	
Columbia City	X	X	X
Crown Hill	X	—	
Eastlake	X	—	
First Hill-Capitol Hill	X	—	
Fremont	X	X	X
Green Lake	X	—	
Greenwood- Phinney Ridge	X	—	
Lake City	—	—	
Madison-Miller	X	X (part of Central Area Survey)	
Morgan Junction	X	—	
North Beacon Hill	X	X	
North Rainier	X	X	X
Northgate	X	—	
Othello/MLK @ Holly Street	X	—	
Rainier Beach	X	—	
Ravenna	X	—	
Roosevelt	X	—	
South Park	X	X	X
University Community	X	X	
Upper Queen Anne	X	X	X
Wallingford	X	X	X
West Seattle Junction*	X	X	X
Westwood-Highland Park	X	—	—

*Independent survey undertaken by West Seattle Junction Historical Survey Group.

Source: ESA, 2017.

UNREINFORCED MASONRY BUILDINGS

All urban villages and proposed expansion areas contain Unreinforced Masonry buildings (URM). This is a common citywide building type, most often represented by a one-story brick-clad building with storefronts (Sheridan 2002). These buildings are often eligible for listing in a historic register and contribute to the historic character of neighborhoods. To date, seismic upgrades are required for URMs only when owners undertake large remodel projects. The City is considering a new policy regarding URMs; recommendations for the policy have been developed by City-sponsored URM Policy Committee. The policy would mandate seismic retrofitting over an extended time period. Objectives include preservation of historic landmarks, neighborhood character, and minimizing vacant or demolished buildings.

The Policy Committee submitted its final recommendations to the City on August 3, 2017. To date, the policy has not been adopted. The Policy Committee recommends excluding the retrofitting requirement for buildings that have brick veneer, concrete masonry, and are single-family and two-unit residences.

BELOWGROUND CULTURAL RESOURCES

The entire study area has varying sensitivity for containing intact belowground cultural resources. These resources can be associated with either the precontact era or historic era, or in some cases both. The Washington State Department of Archaeology and Historic Preservation maintains a Statewide Archaeological Predictive Model which can be used a starting point to assess risk for buried, intact cultural resources (DAHP, 2010). It is based upon several factors including proximity to water, other known archaeological resources, and slope. The model is limited to only precontact-era cultural resources.

The model classifies the study area as a range of risk levels, from Low to Very High. Generally, the urban villages nearest to the Puget Sound shorelines, streams, or lakes have a higher risk classification. While belowground historic-era cultural resources are not addressed by the Statewide Predictive Model, the urban setting of the study area is an indicator of a high sensitivity for containing these types of cultural resources.

3.5.2 IMPACTS

The MHA program would not directly impact any historic or cultural resources, but development allowed by the MHA program could impact these resources indirectly by affecting decisions to demolish or redevelop historic-aged properties or construct new properties on land that may contain belowground cultural resources. The estimated growth rates under the Alternatives are indicators of potential impacts to historic and cultural resources. Areas with a higher growth rate have the potential for more redevelopment than areas with lower projected growth rates. Potential growth rates under Alternative 2 and Alternative 3 could result in the same average potential rate of 39 percent, however the potential growth rate for each urban village differs under the Alternatives. For this analysis, potential significant impacts will be defined as potential growth rates of 50 percent or greater than the potential growth rates under the No Action Alternative (see Chapter 2, Exhibit 2–8). While potential growth rates less than 50 percent could still result in impacts to historic-aged properties and belowground cultural resources, the amount of growth within each urban village could potentially result in less impact to the overall historic fabric of an urban village.

In addition to growth rates, proposed rezoning changes have the potential to impact historic-aged resources and belowground cultural resources through increasing the allowable capacity within rezoned areas, which could introduce changes in the scale of the urban villages. Redevelopment and demolition of historic-aged resources could occur within M, M1, and M2 rezoning tiers, if projects are undertaken in these areas and projects involve historic-aged resources. Areas rezoned M have the potential for scale increases; however, these increases would allow less of a change than within areas rezoned M1 and M2. Areas rezoned M1 would allow increases into the next highest zone category, which would mean greater increases in allowable scale, and areas rezoned M2 would allow capacity increases of two or more zone categories, which would be the greatest possible increase in scale.

IMPACTS COMMON TO ALL ALTERNATIVES

Redevelopment, demolition, and new construction projects could occur in the study area as a result of all Alternatives; these projects could impact historic resources or result in ground disturbance. Any ground disturbance could impact belowground cultural resources, if present. However, existing policies and regulations regarding review of historic and cultural resources would not change under any Alternative. For

development projects within the study area that would be subject to SEPA, potential impacts to historic and cultural resources would still be considered during project-level SEPA review. Potential impacts to historic and cultural resources would still be considered for projects subject to Washington State Executive Order 05-05 and Section 106 of the National Historic Preservation Act.

None of the Alternatives propose 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. Zoning changes are proposed in areas abutting several historic districts, as listed above. These changes may have indirect impacts on historic districts if buildings are demolished or redeveloped adjacent to, or across the street from, these boundaries. For projects subject to SEPA, demolition or substantial modifications to buildings over 50 years in age that are adjacent or across the street from designated Seattle Landmarks are subject to review for their potential adverse impacts on the designated landmark (SMC 25.05.675H). Potential future impacts to newly-created historic districts would be considered at an individual basis at the time of designation.

Potential impacts to historic resources could occur from demolition, redevelopment that impacts the character of a historic property, or development adjacent to a designated landmark if the development alters the setting of the landmark and the setting is a contributing element of that landmark's eligibility. Redevelopment could result in a significant adverse impact for properties that have the potential to be landmarks if the regulatory process governing the development does not require consideration of that property's potential eligibility as a Seattle Landmark, such as projects exempt from review under SEPA. For example, projects with fewer than 20 residential units, or that have less than 12,000 square feet of commercial space, are exempt from SEPA review.

Typical SEPA-exempt projects that could occur under the project would be redevelopment or replacement of single-family residences and small buildings with slightly larger residences and buildings. Alternatives 2, and 3, and the Preferred Alternative propose increased development capacity through standard increases; a standard increase is defined in Chapter 2 as increases to the maximum height limit, typically the addition of one story, and increases to the Floor Area Ration (FAR). In some locations other standards such as maximum density or minimum lot size would be adjusted to allow for additional capacity. These increases have the potential to result in changes to the historic scale of neighborhoods.

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. As a neighborhood's historic fabric decreases, it is less likely to meet local and federal eligibility criteria for consideration as a historic district. For projects subject to SEPA, demolition or substantial modifications to buildings over 50 years in age that are adjacent or across the street from designated Seattle Landmarks are subject to review for their potential adverse impacts on the designated landmark (SMC 25.05.675H). When reviewing the project, the Landmarks preservation Board uses the Secretary of Interior Standards as guidelines. If adverse impacts are identified, mitigation measures may be required. Measures could include sympathetic façade, street, or design treatment or reconfiguring the project and/or location of the project.

It is possible that historic and cultural resources that are significant to racial and ethnic minority populations and immigrant communities could be impacted. Communities with marginalized and/or immigrant populations may have lower participation in government processes, such as SEPA review or formation of neighborhood design guidelines. Therefore, existing protections for cultural and historic resources that are of particular importance to racial and ethnic minority populations and immigrant communities may not be as effective as they are for historic and cultural resources of particular importance to other populations and communities.

It is possible that some historic structures, including commercial or residential structures, contain relatively affordable spaces. Older housing or commercial spaces that do not conform to contemporary preferences for configurations or amenities may command lower rents relative to newly constructed buildings. Therefore preservation of historic structures can in some instances provide affordability benefit.

All Alternatives anticipate residential and commercial growth in all urban villages and proposed expansion areas. The average projected growth rate under Alternatives 2 and 3 is the same across the study area (39 percent) however anticipated growth rates for individual urban villages differ. The average projected growth rate under the Preferred Alternative is slightly less (38 percent); however anticipated growth rates for individual urban villages differ among all EIS alternatives. For the proposed expansion areas outside of urban villages, the same estimated growth rate is anticipated under Alternatives 2, ~~and 3,~~ and the Preferred Alternative (24 percent).

Two urban villages are projected to have housing growth rates above 50 percent under the Preferred Alternative and both Alternative 2 and Alternative 3: Morgan Junction and Crown Hill. Both neighborhoods contain historic-aged buildings and URM. The Preferred Alternative projects a higher growth rate than Alternative 2 but a lower growth rate than Alternative 3.

Under the Preferred Alternative, the housing growth rate in Crown Hill is estimated to increase by 108 percent versus 61 percent under Alternative 2 and 155 percent under Alternative 3.

~~Alternative 2 projects the lowest housing growth rate for both urban villages. Under Alternative 2, the housing growth rate in Crown Hill is estimated to increase by 61 percent versus 155 percent under Alternative 3. For Morgan Junction, the Preferred Alternative estimates the housing growth rate will increase by 112 percent versus 87 percent under Alternative 2 and 172% under Alternative 3. 2 estimates the housing growth rate will increase by 87 percent versus 172 percent under Alternative 3.~~

Under all Alternatives, current City regulations for renovations to URM require seismic upgrades for large renovation projects. Seismic retrofitting could result in an adverse impact to a historic resource through changes to the exterior façade, however the result would likely improve the resource's longevity and structural stability. A new policy that would mandate seismic retrofitting over an extended time period is currently being considered, and could possibly influence whether some affected properties redevelop. Requirements for seismic retrofitting would be a cost to owners of URM structures. MHA implementation on the site of a URM structure would also be a cost to owners when the structure is expanded or when more housing units are added within the structure. When an existing amount of commercial square footage or housing is maintained within the retrofit of a structure there would be no additional cost due to MHA. In cases where MHA applies to renovation of a URM structure it is possible that the combination of URM retrofit costs and MHA affordable housing requirements and costs could affect the financial decision by property owners about whether to renovate or modify URM structures. However, the positive revenue potential due to allowance for an additional story or additional floor area in a URM structure due to MHA implementation could also spur a property owner decision to renovate and prolong the life of a URM structure. Implementation of MHA on URM sites along with other sites would provide parity in MHA requirements, which would avoid the creation of an indirect and unintentional incentive encouraging redevelopment of URM sites.

IMPACTS OF ALTERNATIVE 1 NO ACTION

Alternative 1 would not implement the MHA program and there would be no increase in development capacity, but would include the same growth estimate, resulting in an addition of 70,000 households based on the Seattle 2035 Comprehensive Plan growth boundaries. Under Alternative 1, redevelopment, demolition, and new construction projects could occur in the study area. These projects may be exempt from project-level SEPA review, which could result in impacts to historic and cultural resources, if present and no other regulation requiring consideration of impacts to historic and cultural resources applies to the project.

IMPACTS OF ALTERNATIVE 2

Alternative 2 estimates 10 urban villages will have a housing growth rate of over 50 percent more than could under Alternative 1 (Exhibit 3.5–5). The growth rates for these 10 urban villages range between 51 percent and 87 percent with an average of 63.6 percent estimated housing growth rate. The 10 urban villages are 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

Exhibit 3.5–5 Urban Villages with 50% or Greater Estimated Housing Growth Under Alternatives 1 and 2

Urban Village	Estimated Housing Growth Under Alternative 1*	Estimated Housing Growth Under Alternative 2	Systematic Inventory Conducted
23rd & Union-Jackson	1,600	2,668 (67%)	Yes (part of Central Area Survey)
Columbia City	800	1,205 (51%)	Yes
Crown Hill	700	1,128 (61%)	No
First Hill-Capitol Hill	6,000	10,283 (71%)	No
Morgan Junction	400	746 (87%)	No
North Beacon Hill	400	712 (78%)	Yes
Northgate	3,000	4,526 (51%)	No
Othello/MLK @ Holly Street	900	1,361 (51%)	No
South Park	400	646 (62%)	Yes
Westwood-Highland Park	600	939 (57%)	No

*Presented in housing units estimated under the Comprehensive Plan.

Source: Chapter 2, Exhibit 2–7 and Exhibit 2–8.

these, the oldest urban villages are 23rd & Union-Jackson and First Hill-Capitol Hill. These are likely to contain the oldest buildings, however all of the urban villages contain buildings 25 years or older, which qualify for consideration as potential historic resources. Systematic inventories have been conducted for four of the 10 urban villages.

IMPACTS OF ALTERNATIVE 3

Alternative 3 estimates eight urban villages will have a housing growth rate of over 50 percent greater than could under Alternative 1 (Exhibit 3.5–6). The growth rate for these eight urban villages ranges between 56 percent and 172 percent with an average of 102.75 percent estimated housing growth rate. Four of those have estimated growth rates over 100 percent. The urban villages over 50 percent are: 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. However, all of the urban villages contain buildings 25 years or older, which qualify for consideration as potential historic resources. Systematic inventories have been conducted for three of the eight urban villages.

Exhibit 3.5–6 Urban Villages with 50% or Greater Estimated Housing Growth Under Alternatives 1 and 3

Urban Village	Estimated Housing Growth Under Alternative 1*	Estimated Housing Growth Under Alternative 3	Systematic Inventory Conducted
Admiral	300	467 (56%)	No
Crown Hill	700	1,784 (155%)	No
Eastlake	800	1,482 (85%)	No
Fremont	1,300	2,050 (58%)	Yes
Green Lake	600	1,218 (103%)	No
Madison-Miller	800	1,488 (86%)	Yes (part of Central Area Survey)
Morgan Junction	400	1,086 (172%)	No
Wallingford	1,000	2,066 (107%)	Yes

*Presented in housing units estimated under the Comprehensive Plan.

Source: Chapter 2, Exhibit 2–7 and Exhibit 2–8.

IMPACTS OF THE PREFERRED ALTERNATIVE

New to the FEIS

Impacts of the Preferred Alternative, including Exhibit 3.5–7, is a new section since issuance of the DEIS

The Preferred Alternative estimates seven urban villages will have a housing growth rate of over 50 percent greater than could occur under Alternative 1 (Exhibit 3.5–7). The growth rates for these seven urban villages range between 54 percent and 112 percent with an average of 86.43 percent estimated housing growth rate. Two have estimated growth rates over 100 percent. The urban villages over 50 percent are: Crown Hill, 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 were incorporated in 1907 or later.

However, all of these urban villages contain buildings 25 years or older, which would qualify for consideration as potential historic resources. Systematic inventories have been conducted for four of the seven urban villages.

Exhibit 3.5–7 Urban Villages with 50% or Greater Estimated Housing Growth Under Alternative 1 and the Preferred Alternative

Urban Village	Estimated Housing Growth Under Alternative 1*	Estimated Housing Growth Under Preferred Alternative	Systematic Inventory Conducted
Crown Hill	700	1,455 (108%)	No
Fremont	1,300	2,003 (54%)	Yes
Green Lake	600	1,087 (81%)	No
Madison-Miller	800	1,533 (92%)	Yes (part of Central Area Survey)
Morgan Junction	400	849 (112%)	No
North Beacon Hill	400	651 (63%)	Yes
Wallingford	1,000	1,947 (95%)	Yes

*Presented in housing units estimated under the Comprehensive Plan.

Source: Chapter 2, Exhibit 2–7 and Exhibit 2–8.

3.5.3 MITIGATION MEASURES

Proposed and existing mitigation measures that would reduce potential impacts to historic and cultural resources include:

- Existing 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 per the Seattle Municipal Code.
- Funding continuation of the City-initiated comprehensive historic survey and inventory work that ~~was begun~~ began in 2000 to prepare neighborhood historic context statements and identify historic-aged buildings and potential historic districts.
- Funding City-led thematic historic context inventories that focus on marginalized or underrepresented immigrant communities and preparing thematic context statements relating to those resources.
- Considering potential impacts to historic resources during development review specifically that are associated with marginalized or underrepresented immigrant communities as part of project level SEPA review, or during the design review process.
- Funding City-initiated proactive landmark nominations for properties and potential historic districts identified in new neighborhood surveys.
- Prioritizing City funding for retrofitting Unreinforced Masonry (URM) buildings to those properties that meet eligibility requirements for designation as a landmark or for listing in the National Register of Historic Places.
- Establishing new historic districts to preserve the historic fabric a neighborhood.
- Establishing new conservation districts in order to encourage preservation of older structures (referred to in SMC as “character structures”).
- Establishing Transfer of Development Rights (TDR programs within new conservation districts to provide incentives for property owners to keep existing character structures.
- Incorporate development standards in MHA implementation that ensure incentives for preservation in the existing Pike/Pine Conservation Overlay District are maintained.

- Adding regulatory authority to identify resource-specific mitigation before demolition occurs.
- Requiring project proponents to nominate buildings for landmark review when demolition of properties that are over 50 years old is proposed, regardless of City permitting requirements, by modifying the SEPA exemptions thresholds in the Seattle Municipal Code at Table A for section 25.05.800, and Table B for section 25.05.800.

~~Other mitigation measures could include conducting additional systematic neighborhood surveys to identify historic-aged buildings and potential historic districts; establishing new historic districts to preserve the historic fabric of a neighborhood; establishing new conservation districts such as the City's Pike/Pine Conservation District in order to limit the size of new development and encourage preservation of older structures (referred to in SMC as "character structures"); establishing Transfer of Development Rights (TDR) programs within new conservation districts to provide incentives for property owners to keep existing character structures; and requiring that any structure over 25 years in age that is subject to demolition, including those undergoing SEPA-exempt development, is assessed for Landmark eligibility, and adding regulatory authority to identify resource-specific mitigation before demolition occurs.~~

UNREINFORCED MASONRY BUILDINGS

~~If seismic retrofitting is required, Proposed mitigation measures specific to reducing potential impacts to unreinforced masonry buildings include: could be mitigated through~~

- Prioritizing City investments of affordable housing funds, and/or other public capital investments, for retrofitting Unreinforced Masonry (URM) buildings to those properties that meet eligibility requirements for designation as a landmark or for listing in the National Register of Historic Places.
- Requiring adherence to the Secretary of the Interior's Standards for the Treatment of Historic Properties which provides guidance on retaining a building's historic character (Weeks and Grimmer 1995).

3.5.4 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Since no changes will occur to existing policies and regulations regarding review of historic and cultural resources under any alternative, projects subject to review under existing policies and regulations would still be reviewed at the project level, if and when redevelopment is proposed. Potential impacts, therefore, are avoidable. Since review at the project level is a basis for mitigating potential impact of the proposal to a non-significant level, implementation of a combination of the mitigation measures listed would be required to fully avoid indirect significant impacts to historic resources. At the general programmatic level of theis analysis in this programmatic EIS, no significant unavoidable direct impacts to historic and cultural resources are anticipated under any of the proposed alternatives.



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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.

3.6



BIOLOGICAL RESOURCES.

The section provides a qualitative assessment of potential impacts to biological resources within the project study area. For the purposes of this analysis, the resources covered include environmentally critical areas (ECAs), as defined by SMC 25.09, and the City's urban forest and tree cover.

3.6.1 AFFECTED ENVIRONMENT

POLICY FRAMEWORK

ECAs

Regulations for ECAs apply to any habitat alteration in landslide-prone areas (steep slopes), riparian corridors, wetlands, and various buffers (SMC 25.09). Proposed development on a property with a mapped ECA requires a different level of City review, specific regulations, and additional safeguards to ensure that slope stability, drainage and/or other ecological functions and values are protected where present; and that proposed structures are designed to avoid and minimize risks of future issues in these areas. These safeguards may include tree and vegetation protections, water quality regulations, and development setbacks around sensitive areas, as well as mandatory construction best practices to prevent landslides and ensure building stability.

Tree Protection

Trees in the City are specifically valued and legally protected under various regulations in addition to the ECA code (SMC 25.09.320). These include the Tree Protection Ordinance (SMC 25.11), landscaping requirements in each zoning category (SMC 23), and specific environmental regulations (SMC 25.05.675)

that implement the goals and policies of the Seattle 2035 Comprehensive Plan for protection of the urban forest. Exceptional trees are specifically protected and defined as a tree or group of trees that constitutes an important community resource because of its unique historical, ecological, or aesthetic value. The regulations include provisions for tree protection, removal, replacement, and designation of exceptional trees.

Seattle's Department of Construction & Inspections (SDCI) Office of Sustainability and Environment (OSE) conducted an analysis of existing tree protection measures to assess whether or not the current regulations and processes are helping the City achieve the goals of the Urban Forest Stewardship Plan (UFSP). The findings are informing the development of recommendations to address gaps and opportunities (City of Seattle, 2017c). In October of 2017, the Mayor signed executive order 2017-11 directing City departments to improve departmental coordination, strengthen enforcement, and adopt new regulations to improve and expand protections for Seattle's urban trees and canopy coverage.

2013 Urban Forest Stewardship Plan

The City implemented the Urban Forest Management Plan (UFSP) in 2007 to outline actions needed to maintain the urban forest. The 30-year plan "set a goal to increase Seattle's canopy cover to 30 percent by 2037 and created a framework for City departments, non-profit organizations, residents, and the community as a whole to support efforts to maintain the urban forest" (City of Seattle, 2013). The 2013 Urban Forest Stewardship Plan is a comprehensive update to the 2007 Plan.

The UFSP establishes four goals:

1. Create an ethic of stewardship for the urban forest among City staff, community organizations, businesses, and residents;
2. Strive to replace and enhance specific urban forest functions and benefits when trees are lost, and achieve a net increase in the urban forest functions and related environmental, economic, and social benefits;
3. Expand canopy cover to 30 percent by 2037; and
4. Remove invasive species and improve species and age diversity to increase the health and longevity of the City's urban forest (City of Seattle, 2013).

Seattle recently completed a 2016 canopy cover analysis which shows a 28 percent canopy cover citywide. The majority of trees are located in residential zones, representing 67 percent of the land and 72 percent

of the tree canopy. The public right-of-way (interspersed in all zones) holds 23 percent of the city's tree canopy. A separate analysis from 2015 suggests Seattle may be losing trees, with an estimated canopy cover loss of 2 percent between 2010 and 2015, with a 3 percent margin of error. The assessment report and presentation materials can be found at www.seattle.gov/trees/.

Street Tree Management Plan

Approximately 40,000 trees within Seattle's road right-of-way areas are managed by the Department of Transportation (SDOT). SDOT implemented the Street Tree Management Plan in 2016 to help facilitate this large task. The goal of the plan is to improve the condition of SDOT-maintained street trees by the end of 2024. The program includes inventory, analysis, deliberate maintenance, and targeted tree replacement to create and maintain healthy and resilient street trees (City of Seattle, 2017b).

ASSESSMENT METHODOLOGY

To characterize and assess potential changes in ECAs and tree canopy cover as a result of proposed changes in zoning classifications and urban village boundary expansion areas within the City, the project team conducted an analysis using geographic information systems (GIS). The following datasets were used:

- MHA Alternative 2 Zoning and Urban Village Expansion (City of Seattle)
- MHA Alternative 3 Zoning and Urban Village Expansion (City of Seattle)
- MHA Preferred Alternative Zoning and Urban Village Expansion (City of Seattle)
- Environmentally Critical Areas (City of Seattle)
- Tree Canopy, derived from 2016 LiDAR (Office of Sustainability and Environment/University of Vermont)
- Green Spaces: Parks, Cemeteries, Public and Private Schools (City of Seattle)
- Urban Villages with Displacement—Access Opportunity category (City of Seattle)

The MHA Alternative 2, ~~and 3,~~ and Preferred Alternative data includes existing and proposed zoning designations. The existing zones and MHA zones were aggregated into zone categories: Single Family (SF), Residential Small Lot (RSL), Residential Low Rise (LR), Residential Mid and High Rise (MR/HR), and Neighborhood Commercial and Commercial

(NC/C). The areas of Urban Village Expansion for Alternatives 2, and 3, and Preferred Alternative include expansions to the boundaries of 10 urban villages (Rainier Beach, Othello, Roosevelt, Ballard, West Seattle Junction, Crown Hill, Columbia City, North Rainier, and 23rd & Union-Jackson), with an additional expansion in Northgate under Alternative 2. The zoning categories were aggregated for the following reasons:

- For NC zones, there is not likely to be significant differences in the amount of tree canopy on redeveloped sites as lot line to lot line development is allowed in all NC zones. The changes in standards for NC zones as well as changes that increase the height of NC zones are likely to result in taller but not wider buildings
- No parcels are proposed to change from MR to HR zones. While HR is significantly taller, the bottom of these structures might not be significantly different.
- There is a significant diversity of development types in LR zones (cottages, townhouses, apartments) that have different impacts on tree canopy. However, the development types do not occur exclusively in any single zone (e.g., townhouse buildings are found in different zones) and the high density does not directly relate to lower tree canopy. For example, townhouses sometimes result in lower canopy than apartments since they spread the structures out and have pavement in between.

To characterize ECAs, the current acreage of individual ECAs was quantified for each Urban Village. The total acreage of all ECAs was quantified for the proposed Urban Village Expansion areas for each of the MHA Alternatives. For areas with proposed changes in zoning designations, a qualitative assessment of the potential impacts to ECAs was conducted using available information. Because this review used existing mapped data sources and no field investigations, it is a general summary for the purposes of identifying ECAs that could be affected by implementation of MHA requirements. Additional resources could exist but are not identifiable at the coarse scale of the GIS data.

The acreage and percent of tree canopy cover was quantified for the existing and proposed zoning designations within each of the MHA Alternatives in GIS. For this analysis, green spaces data were evaluated separately, as tree canopy in these areas are unlikely to change, regardless of zoning change. Tree cover for a given zone was assumed to remain constant over time if the zoning designation stayed the same. For example, a zone change from LR to LR would not represent a change. The one exception was the percent cover for RSL. There is currently only one area zoned RSL in the study area. This did not provide a large enough sample

size to accurately estimate the percent coverage for all current and future RSL zones. Given this, the tree cover was calculated as the average of SF tree cover and LR tree cover, weighted by lot coverage. This calculation assumed that lot coverage translates to canopy coverage proportionally.

Tree Canopy data was created by remote sensing techniques using LiDAR data. The canopy area was then intersected with project areas to calculate acres of tree cover. Comparing the acres of tree cover within a zone to the total amount of area within that zone resulted in percent tree cover. The GIS comparison was done at the city scale and then subdivided and summarized by zoning areas. The percent tree cover was then used to determine the amount of change (change coefficient) for high and low tree change scenarios.

First, the **high scenario** was calculated as the difference in percent between the proposed zone tree cover and the existing zone tree cover. This represents the maximum amount of potential change likely to occur based on the changes in zoning. It would approximate a condition wherein tree canopy would transition completely to the characteristics of the new zone designation over the 20-year period, including tree losses, and tree maturation, and replanting. For example, a high scenario zone change from LR- to NC/-to-C would represent a 10.27 percent change in tree cover while a zone change from RSL to LR would be 0.85 percent. Because development occurs incrementally over time, such a complete transition is unlikely. The **low scenario** was calculated as half of this difference. For example, the same zone change from LR- to NC/-to-C would represent a 5.14 percent change while a zone change from RSL to LR would be 0.43 percent. This assumes a more moderate level of change in canopy cover. The range of tree loss was calculated by multiplying the acres of land in each zone change category by its high and low change coefficient to determine the amount of acres lost for each zone. The same methods were used to calculate tree loss for the Displacement and Access summary table.

EXISTING CONDITIONS

The nature of Seattle's landforms, soils, streams, and wetlands and the risks posed by large seismic events and seasonal weather, has led the City to designate ECAs. These are places where landslides or floods could occur, or major soil movements during earthquakes, or where there are riparian features that have recreational and aesthetic value. ECAs provide natural functions and values that support wildlife presence and also fish passage through major waterbodies. The Seattle Comprehensive Plan Update Draft EIS describes the City's existing landforms and natural

features and provides an overview of ECAs in the City (City of Seattle, 2015). Areas designated as ECAs include (SMC 25.09.020):

- Landslide-prone areas (including steep slope areas, potential landslide areas and known landslide areas)
- Liquefaction-prone areas (sites with loose, saturated soil that can lose the strength needed to support a building during earthquakes)
- Peat-settlement-prone areas (sites containing peat and organic soils that may settle when the area is developed or the water table is lowered)
- Seismic hazard areas
- Volcanic hazard areas
- Flood-prone areas
- Wetlands
- Fish and wildlife habitat conservation areas (including priority habitats and species areas, riparian corridors, and habitat for species of local importance)
- Abandoned landfills

Other studies including the *Duwamish River Cumulative Health Impacts Analysis* describe and examine a range of disproportionate health exposures and impacts affecting people in certain neighborhood areas. (Duwamish River Cleanup Coalition, 2013).

Many but not all of these features are in lightly developed areas or are otherwise protected as parklands in the City. Table 3.1–1 in Chapter 3.1 of the Comprehensive Plan DEIS lists the presence of ECAs in or near urban centers and villages. Generally, while there is often a scattered presence of mapped steep slope ECAs within many lower-density residential neighborhoods, the majority of the urban centers' and villages' areas are developed in the flatter and lesser constrained areas of the city, which do not contain ECAs. The DEIS also describes areas of the City with a greater potential risk of ECA disturbance (City of Seattle, 2015).

A healthy urban forest provides benefits including air and water pollution mitigation, habitat for wildlife, reduction of the urban heat island effect, and storm water runoff reduction. Trees are fundamental to the character of Seattle—a city that celebrates its reputation as one of the country's greenest cities. Trees create beautiful views in their own right, and frame views of other natural wonders, such as Mount Rainier, the Cascade and Olympic mountain ranges, Puget Sound, and magnificent lakes throughout Seattle. Seattle's natural landscape was originally heavily wooded; however, most of the original trees were clear-cut by the late 1800s. Seattle's existing urban forest is mostly human-made and consists of more recently planted vegetation (City of Seattle, 2013).

3.6.2 IMPACTS

The Implementing MHA in the study area program 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. The City's regulations require protective measures such as erosion controls that limit areas subject to construction-related disturbance and minimize the transport of soils and pollutants off site. There are also protections through critical areas regulations that will be applied where relevant, such as buffers, prohibitions on disturbance or limitations on the nature and extent of development activities.

IMPACTS COMMON TO ALL ALTERNATIVES

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. Under all of the alternatives, parcels that are not proposed to have a zoning change but are included within the MHA study area still have the potential for development or redevelopment based on the existing zoning category. However, Alternatives 2, and 3, and the Preferred Alternative would allow more housing units and more dense development within the project study area than would Alternative 1. In the action alternatives, uniform application of MHA to existing areas within urban villages that have ECA's and those that do not, is expected to maintain a balance of development feasibility conditions between lands with and without ECAs.

Under all of the alternatives, zoning changes to lands classified in the public domain would not result in direct impacts to biological resources. This includes parks, open and green spaces, trails, schools, and cemeteries. These public areas are not anticipated to have changes to intensify use over the life of the project. Because of this, it can be inferred that existing ECAs and trees would be retained and allowed to mature naturally. Indirect impacts, such as changes to stream flows from upstream development, could occur. Direct and indirect impacts to ECA's would be evaluated on a project by project basis as a condition of permitting.

IMPACTS OF ALTERNATIVE 1 NO ACTION

Alternative 1 is based on the growth strategy of the Seattle 2035 Comprehensive Plan and assumes that MHA would not be implemented in the study area. No area-wide zoning changes or affordable housing requirements would take place. Under Alternative 1, redevelopment, demolition, and new construction projects could occur in the study area under the existing zoning.

ECAs

Under Alternative 1, there would be no change in zoning due to the MHA program. All existing critical area regulations would continue to govern development in and near ECAs under the current zoning.

Tree Canopy

Under Alternative 1, there would be no change in zoning due to the MHA program. The resulting change in canopy cover is assumed to be static. In other words, changes in canopy coverage would still be expected, but as a result of the current zoning and tree protection policies, codes, and development standards. This study does not quantify tree loss resulting from current development patterns.

IMPACTS OF ALTERNATIVE 2

Alternative 2 would revise the existing Land Use Code, resulting in a potential for 63,070 housing units in the planning area, an increase of 39 percent in housing unit growth compared to 45,361 housing units under Alternative 1. The overall effect would be an additional 17,709 housing units (see Chapter 2, Exhibit 2–7). Additionally, the zoning changes would allow the scale of development to increase and in some cases, the type of structures. For additional details on the potential land use changes that would be allowed under the alternatives, see Section 3.2 Land Use.

In Alternative 2, urban village boundary expansions approximating a full 10-minute walkshed are proposed in 10 of the urban villages where boundary expansions were proposed in the Seattle 2035 Comprehensive Plan update process, plus a small urban village boundary expansion in Northgate. The Seattle 2035 Comprehensive Plan Future Land Use map would be modified to reflect larger urban villages in these areas.

ECAs

Growth will occur in all urban villages in varying amounts due to the proposed changes in zoning and boundary expansion. Given the potential for future growth, ECAs in these areas could experience adverse impacts generated during future construction and by increased density of urban uses and activities after construction.

During Construction

Future development will lead to grading, demolition and similar construction activities that will generate the potential for disturbed soil to be conveyed off site and into nearby drainage systems, primarily through stormwater runoff, tracking of soils, and leaking of petroleum products on surfaces in the local vicinity. Releases could be intentional or unintentional in nature, and could make their way into local streams or wetlands through stormwater washoff and drainage. On construction sites that are close to natural vegetated areas and/or ECAs, there may be increased potential for disturbance to generate adverse impacts, such as when potentially unstable steep slopes or poor quality soils are present.

In a variety of places, future development in properties without ECAs could indirectly lead to adverse effects upon critical areas such as natural ravine drainages that lie in nearby downstream locations. This could occur in places that drain to natural streams or via drainage utility systems that are designed to outfall to natural receiving waterbodies if soils and other pollutants are washed off and conveyed far enough away from construction sites. Compliance with regulations for on-site activities is anticipated to sufficiently address and minimize the potential for adverse impacts of these kinds from future development.

After Construction

Even after construction, future possible activities on residential or commercial properties could adversely affect ECAs directly or indirectly. Examples include: landscaping involving earth movement in or near critical areas, improper tree cutting or other vegetation management that violates City rules, paving areas without including appropriate stormwater control features, or the cumulative effects of multiple parties' actions that could potentially alter drainage patterns and/or affect soil and slope stability.

The proposed changes in zoning may result in increased density and activity levels for residential or commercial purposes and the associated use of automobiles and other activities, which could contribute to additional increments of adverse water quality impacts in ECAs. For

example, wetlands and streams may be impacted by runoff of pollutants from street surfaces and discharge of pollutants into drains. However, the City's current level of requirements for stormwater and water quality controls mean that future development would in most cases be expected to lead to net increases in protection of nearby ECAs or other natural resources, due to the slowing, redirection and treatment of stormwater and surface runoff by on-site systems.

Based on the analysis of available information, ECAs cover approximately 9,000 acres of all Urban Villages combined with nearly 69 percent (6,149 acres) designated as liquefaction prone areas. Under Alternative 2, an additional 142 acres of mapped ECAs would occur within the boundaries of Urban Villages. This is a 1.6 percent increase from current conditions and is considered very minimal. In addition, the expansion areas are located at the outer edges of the current Urban Villages boundaries and are thus adjacent to lower zoning designations. Exhibit 3.6–1 shows the total amount (acres) of each ECA type (i.e., wetland, steep slopes, etc.) for all of the Urban Village Expansion Areas combined. Exhibit 3.6–3 and Exhibit 3.6–4 display the locations of mapped critical areas within the City, Urban Villages, and Urban Village Expansion Areas for MHA Alternative 2.

Exhibit 3.6–1 ECA Analysis Summary, Alternative 2

ECA Type	Amount (Acres) of Mapped ECA within All Existing Urban Villages	Amount (Acres) of Mapped ECA within All MHA Alternative 2 Urban Village Expansion Areas
Steep Slope Erosion Areas	375.5	30.3
Slope 40% Areas	481.9	27.8
Potential Slide Areas	259.6	23.0
Known Slide Areas	37.4	0.9
Liquefaction-Prone Areas	6,148.8	24.1
Peat Settlement-Prone Areas	632.8	4.2
Flood-Prone Areas	138.8	0.1
Wetland Areas	54.7	0.6
Priority Habitats and Species Areas	254.2	30.3
Riparian Corridors	101.3	0.3
Shoreline Habitat Areas	442.7	—
Total	8,927.7	141.6

Note: Only ECAs that overlap urban villages are shown; other ECA types occur within the City, but are not mapped within the existing and proposed expansion areas of Urban Villages (seismic hazard areas, volcanic hazard areas, abandoned landfills). ECA amounts were calculated using 2017 Seattle GIS data for ECAs and the urban village boundaries used for the alternatives.

Source: ESA, 2017.

In general, the parcels within the expansion areas that are changing from non-Urban Village to Urban Village would potentially experience redevelopment, which may affect ECAs in ways described above. Parcels within Urban Villages that have proposed zoning changes may also experience redevelopment due to the changes in the development standards in the land use code (e.g., removal of density limits for some zones and increases in height and the allowable floor-to-area ratios). In particular, the increases in FAR is proposed for all zones except LR1, RSL, and SF may result in potential for adverse impacts to ECAs in and near the vicinity generated during future construction and by increased density of urban uses and activities after construction. However, current ECA regulations would continue to govern development. Projects proposed under the regulations would require site-specific analysis to determine the presence of ECAs, and subsequent avoidance and minimization of potential impacts. In addition, landscaping and setback requirements will be required on parcels in LR, MR, HR, NC, and C zones, which can contribute to overall vegetation preservation and rectification.

Exhibit 3.6–2 provides the total acreage of ECAs that intersect urban villages and expansion areas in Alternative 2. Urban villages with high displacement risk have the largest amounts of ECAs added to urban villages. Compared to Alternative 3, there are 7.2 more acres of ECAs in expansion areas in urban villages with high displacement risk and low access to opportunity. Most of the difference is due to a larger urban village boundary expansion in Rainier Beach. In urban villages with high displacement risk and high access to opportunity, there are 25.9 more acres of ECAs in expansion areas compared to Alternative 3. Most of the difference is due to a larger urban village boundary expansion in the 23rd & Union–Jackson Urban Village near the I-90 right-of-way. Exhibit 3.6–3 and Exhibit 3.6–4 provide maps of ECAs in urban villages.

Exhibit 3.6–2 ECA and Shoreline District Land Area in MHA Study Area Urban Villages and Expansion Areas (Acres), Alternative 2

Neighborhood Type	Existing Urban Villages	Expansion Areas
High Displacement Risk & Low Access to Opportunity	544.4	30.7
Low Displacement Risk & High Access to Opportunity	285.2	2.7
High Displacement Risk & High Access to Opportunity	573.9	47.8
Low Displacement Risk & Low Access to Opportunity	23.3	—

Source: ESA, 2017.

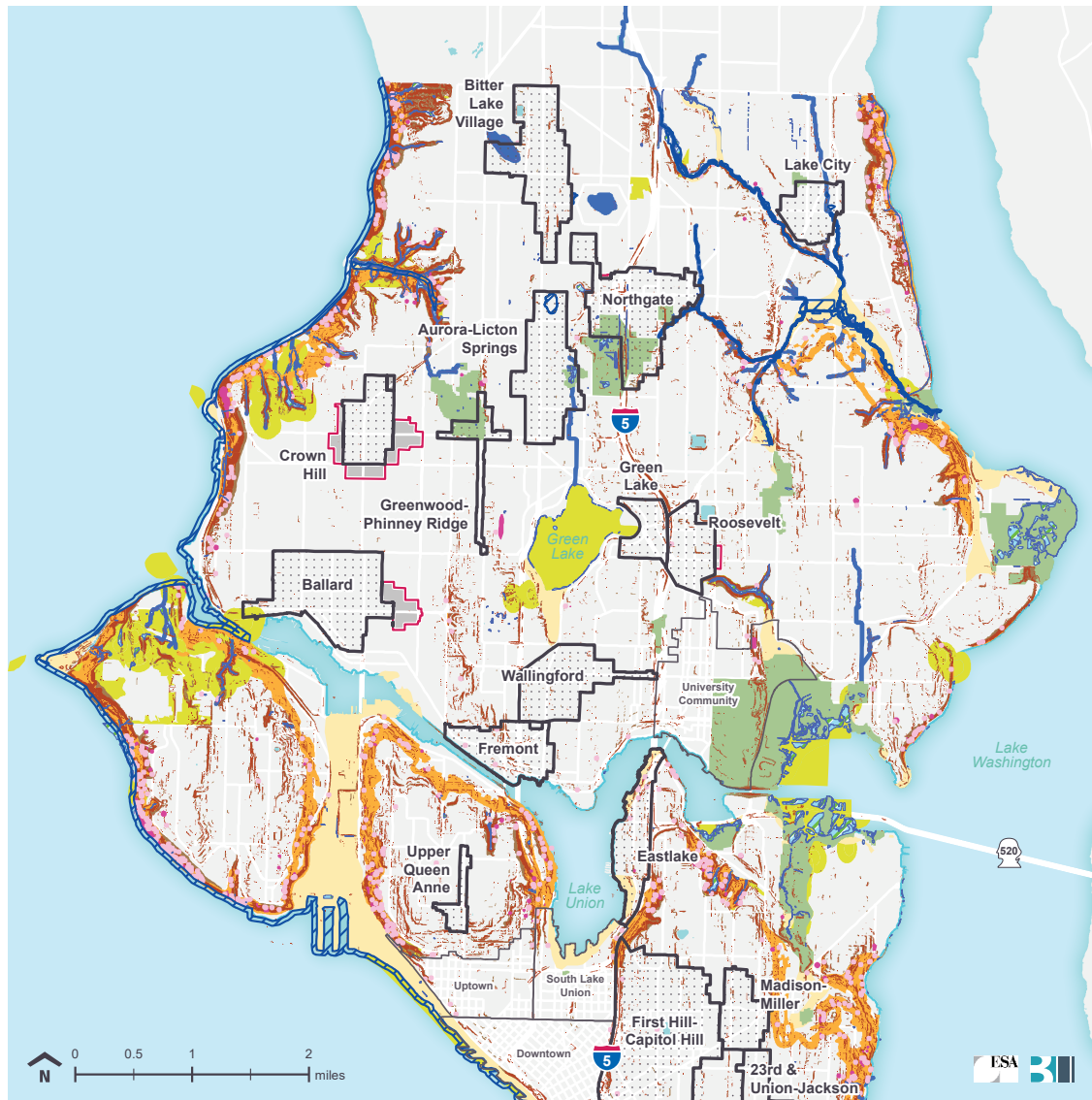


Exhibit 3.6-3 Critical Areas, Alternative 2 North

Geologic Hazard and Steep Slope Areas

- Known Slide Location
- Known Slide Area
- Slopes <40%
- Potential Slide Areas
- Steep Slope Erosion Areas
- Peat Settlement Prone Areas
- Liquefaction Prone Areas

Fish and Wildlife Habitat Conservation Areas

- Riparian Corridor
- Priority Habitats and Species Areas
- Shoreline Habitat
- Flood Prone Areas
- Wetlands

Urban Centers/Villages

- In MHA Study Area
- Outside MHA Study Area
- Potential Expansion Areas: Alternative 2

Source: City of Seattle, 2017; Seattle Department of Transportation, 2017.



Exhibit 3.6-4 Critical Areas, Alternative 2 South

Geologic Hazard and Steep Slope Areas

- Known Slide Location
- Known Slide Area
- Slopes <40%
- Potential Slide Areas
- Steep Slope Erosion Areas
- Peat Settlement Prone Areas
- Liquefaction Prone Areas

Fish and Wildlife Habitat Conservation Areas

- Riparian Corridor
- Priority Habitats and Species Areas
- Shoreline Habitat
- Flood Prone Areas
- Wetlands

Urban Centers/Villages

- In MHA Study Area
- Outside MHA Study Area
- Potential Expansion Areas: Alternative 2

Source: City of Seattle, 2017; Seattle Department of Transportation, 2017.

Tree Canopy

The analysis described above was completed for the Alternative 2 zoning changes and is summarized in Exhibit 3.6–5. The parcels changing from SF and LR to NC/C would see the largest change in tree canopy cover if fully developed; however, these two categories only account for approximately 13 acres within the 2,466-acre study area. Overall, there is currently approximately 20 percent tree canopy coverage within the Alternative 2 study area. With the zoning changes proposed in Alternative 2, there is the potential for a total loss of between 5 and 11 acres of tree canopy cover within the study area.

Exhibit 3.6–6 summarizes the existing tree canopy cover for the Alternative 2 study area by Displacement Risk and Access to Opportunity categories. In all cases, there is less than one percent difference between the existing cover and the Alternative 2 scenario.

In every category, there is less than one-half of one percent (<0.5 percent) difference between the existing tree canopy cover and the Alternative 2 scenario. In addition, this change in cover is a conservative scenario based on full conversion to characteristics of the proposed zoning.

The Tree Protection Ordinance (SMC 25.11) would not change with the proposed changes in zoning and would regulate all tree removal resulting from implementation of the project. The City does not have a threshold for determining significance of tree loss. Assuming that all tree protection regulations are implemented with future development under the new zoning, the This change in tree canopy cover under Alternative 2 is not considered a significant impact.

Exhibit 3.6–5 Tree Canopy Analysis Summary, Alternative 2

EXISTING				CHANGE COEFFICIENT		ALTERNATIVE 2 ACRES OF TREE COVER	
Zone	Tree Cover	Zone Change	2016 Acres of Tree Cover	High Scenario	Low Scenario	High Scenario	Low Scenario
Green Space*	30.09%		215.2			215.2	215.2
LR	23.41%	LR to LR	1,057.5	0.00%	0.00%	1,057.5	1,057.5
MR/HR	21.14%	LR to MR/HR	48.9	-2.27%	-1.14%	47.8	48.4
NC/C	13.14%	LR to NC/C	7.3	-10.27%	-5.14%	6.6	6.9
RSL	24.26%	MR/HR to MR/HR	85.7	0.00%	0.00%	85.7	85.7
SF	25.43%	MR/HR to NC/C	0.5	-8.00%	-4.00%	0.5	0.5
		NC/C to NC/C	530.9	0.00%	0.00%	530.9	530.9
		RSL to LR	3.2	-0.85%	-0.43%	3.1	3.1
		SF to LR	255.1	-2.02%	-1.01%	249.9	252.5
		SF to NC/C	6.1	-12.29%	-6.15%	5.4	5.7
		SF to RSL	255.4	-1.17%	-0.59%	252.4	253.9
Total Acres			2,465.8			2,455.0	2,460.4
Total %			20.61%			20.52%	20.56%

*Green space includes parks, cemeteries, public and private schools.

Note: Single Family (SF), Residential Small Lot (RSL), Residential Low Rise (LR), Residential Mid and High Rise (MR/HR), and Neighborhood Commercial and Commercial (NC/C).

Source: ESA, 2017.

Exhibit 3.6–6 Tree Cover by Displacement/Access Group, Alternative 2

ALTERNATIVE 2			
Displacement and Access	Existing Tree Cover*	High Scenario	Low Scenario
High Displacement Risk & High Access to Opportunity	19.63%	19.49%	19.56%
High Displacement Risk & Low Access to Opportunity	19.04%	18.83%	18.94%
Low Displacement Risk & High Access to Opportunity	19.49%	19.36%	19.42%
Low Displacement Risk & Low Access to Opportunity	17.31%	17.18%	17.25%

*Excludes all areas in green spaces.

Source: ESA, 2017.

IMPACTS OF ALTERNATIVE 3

Alternative 3 would revise the existing Land Use Code resulting in a potential for 62,858 housing units in the planning area, an increase of 38.6 percent in housing unit growth compared to 45,361 housing units under Alternative 1. The overall effect would be an additional 17,497 housing units (see Chapter 2, Exhibit 2–7).

Under Alternative 3, expansions to the boundaries of 10 urban villages are proposed, and the Future Land Use map would be modified to reflect the larger urban villages. However, urban village boundary expansion areas are reduced from an approximate 10-minute walkshed, to an approximate 5-minute walkshed from the transit node for certain urban villages based on the Access to Opportunity and Displacement Risk typology. This reduced walkshed results in smaller urban village boundary expansions for Rainier Beach, Othello, North Rainier, North Beacon Hill and 23rd & Union-Jackson in Alternative 3 compared to Alternative 2.

ECAs

Based on the analysis for Alternative 3, an additional 102 acres of ECAs would be within the expanded boundaries, or a 1.2 percent increase from existing conditions (Exhibit 3.6–7). This is approximately 40 acres less than Alternative 2, although both alternatives would experience very minimal changes in comparison to the current amount of mapped critical areas. As with Alternative 2, parcels within Urban Villages that have proposed zoning changes may also experience redevelopment due to the changes in the development standards. Current critical areas would continue to govern development and projects proposed under the regulations would require site analysis to determine the presence of ECAs, and subsequent avoidance and minimization of potential impacts.

Exhibit 3.6–8 provides the total acreage of ECAs that intersect in urban villages and expansion areas in Alternative 3. The largest increases in ECA acreage occur in urban villages with high displacement risk, like Alternative 2 but to a lesser degree. Compared to Alternative 2, there are 7.2 fewer acres of ECAs in expansion areas in urban villages with high displacement risk and low access to opportunity. Most of the difference is due to a smaller urban village boundary expansion in Rainier Beach. In urban villages with high displacement risk and high access to opportunity, there are 25.9 fewer acres of ECAs in expansion areas compared to Alternative 2. Most of the difference is due to a smaller urban village boundary expansion in the 23rd & Union–Jackson Urban Village near

Exhibit 3.6–7 ECA Analysis Summary, Alternative 3

ECA Type	Amount (Acres) of Mapped ECA within All Existing Urban Villages	Amount (Acres) of Mapped ECA within All MHA Alternative 3 Urban Village Expansion Areas
Steep Slope Erosion Areas	375.5	24.4
Slope 40% Areas	481.9	21.4
Potential Slide Areas	259.6	17.0
Known Slide Areas	37.4	0.5
Liquefaction-Prone Areas	6,148.8	8.6
Peat Settlement-Prone Areas	632.8	—
Flood-Prone Areas	138.8	0.1
Wetland Areas	54.7	0.4
Priority Habitats and Species Areas	254.2	29.6
Riparian Corridors	101.3	0.3
Shoreline Habitat Areas	442.7	—
Total	8,927.7	102.3

Note: Only ECAs that overlap urban villages are shown; other ECA types occur within the City, but are not mapped within the existing and proposed expansion areas of Urban Villages (seismic hazard areas, volcanic hazard areas, abandoned landfills). ECA amounts were calculated using 2017 Seattle GIS data for ECAs and the urban village boundaries used for the alternatives.

Source: ESA, 2017.

Exhibit 3.6–8 ECA and Shoreline District Land Area in MHA Study Area Urban Villages and Expansion Areas (Acres), Alternative 3

Neighborhood Type	Existing Urban Villages	Expansion Areas
High Displacement Risk & Low Access to Opportunity	501.9	23.4
Low Displacement Risk & High Access to Opportunity	275.2	3.6
High Displacement Risk & High Access to Opportunity	573.6	21.9
Low Displacement Risk & Low Access to Opportunity	23.3	—

Source: ESA, 2017.

the I-90 right-of-way. Compared to Alternative 2, 0.9 more acres of ECAs exist in expansion areas in urban villages with low displacement risk and high access to opportunity due to the inclusion of small isolated ECA areas in West Seattle Junction and Roosevelt. Exhibit 3.6–9 and Exhibit 3.6–10 provide maps of ECAs in urban villages.

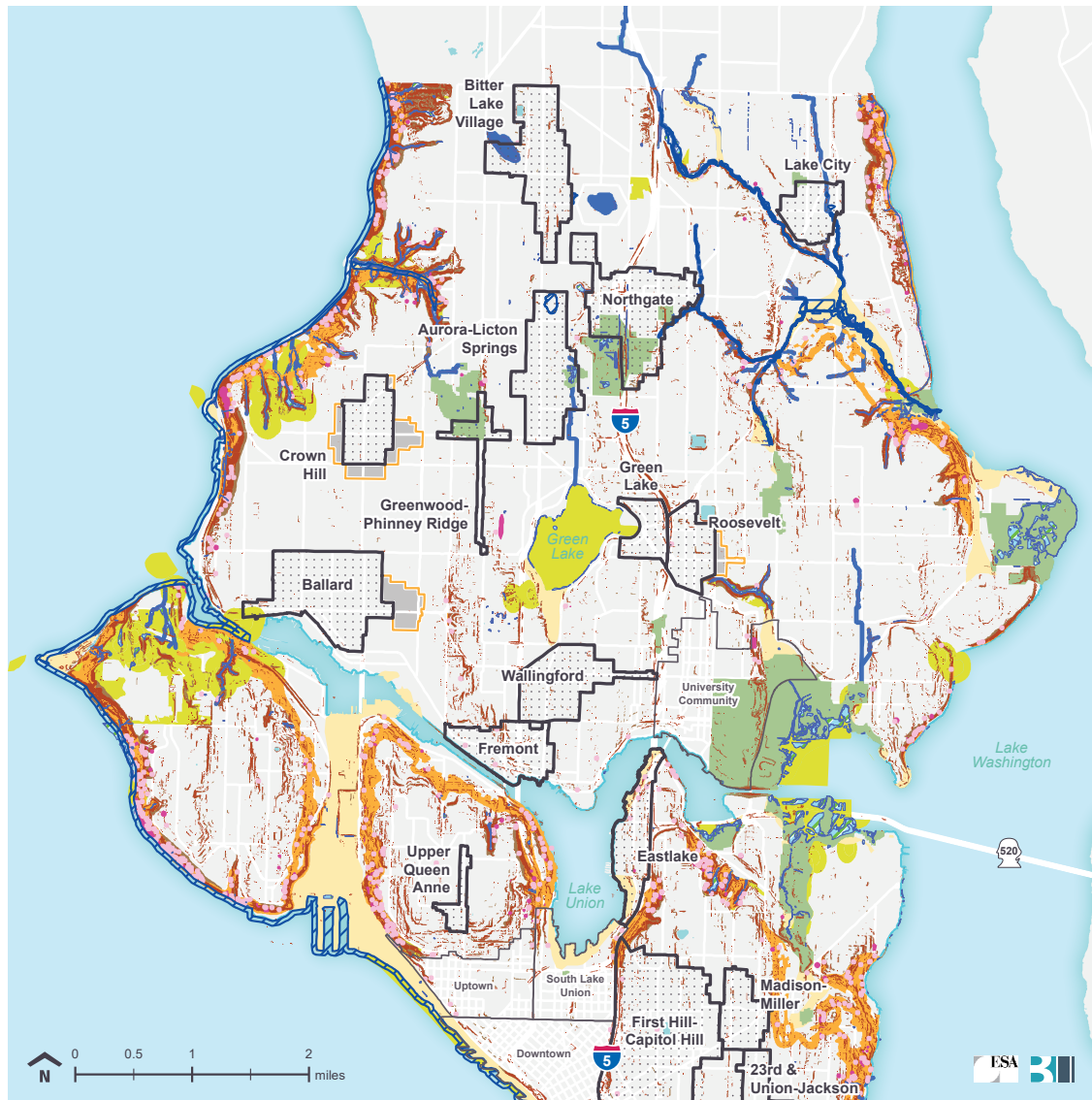


Exhibit 3.6–9 Critical Areas, Alternative 3 North

Geologic Hazard and Steep Slope Areas

- Known Slide Location
- Known Slide Area
- Slopes <40%
- Potential Slide Areas
- Steep Slope Erosion Areas
- Peat Settlement Prone Areas
- Liquefaction Prone Areas

Fish and Wildlife Habitat Conservation Areas

- Riparian Corridor
- Priority Habitats and Species Areas
- Shoreline Habitat
- Flood Prone Areas
- Wetlands

Urban Centers/Villages

- In MHA Study Area
- Outside MHA Study Area
- Potential Expansion Areas: Alternative 3

Source: City of Seattle, 2017; Seattle Department of Transportation, 2017.



Exhibit 3.6-10 Critical Areas, Alternative 3 South

Geologic Hazard and Steep Slope Areas

- Known Slide Location
- Known Slide Area
- Slopes <40%
- Potential Slide Areas
- Steep Slope Erosion Areas
- Peat Settlement Prone Areas
- Liquefaction Prone Areas

Fish and Wildlife Habitat Conservation Areas

- Riparian Corridor
- Priority Habitats and Species Areas
- Shoreline Habitat
- Flood Prone Areas
- Wetlands

Urban Centers/Villages

- In MHA Study Area
- Outside MHA Study Area
- Potential Expansion Areas: Alternative 3

Source: City of Seattle, 2017; Seattle Department of Transportation, 2017.

Tree Canopy

The analysis described above was completed for the Alternative 3 zoning changes and is summarized in Exhibit 3.6–11. Similar to Alternative 2, the parcels changing from SF and LR to NC/C would see the largest change in tree canopy cover if fully developed; however, these two categories only account for approximately 15 acres within the 2,383-acre study area. Overall, there is currently approximately 21 percent tree canopy coverage within the Alternative 3 study area. With the zoning changes proposed in Alternative 3, there is the potential for a total loss of between 8 and 16 acres of tree canopy cover.

Exhibit 3.6–12 summarizes the existing tree canopy cover for the Alternative 3 study area by Displacement Risk and Access to Opportunity categories.

In every category, there is less than one-half of one percent (<0.5 percent) difference between the existing tree canopy cover and the Alternative 3 scenario. In addition, this change in cover is a worst-case scenario based on full development under the proposed zoning.

The Tree Protection Ordinance (SMC 25.11) would not change with the proposed changes in zoning and would regulate all tree removal resulting from implementation of the project. The City does not have a threshold for determining significance of tree loss. Assuming that all tree protection regulations are implemented with future development under the new zoning, the change in tree canopy cover under Alternative 3 is not considered a significant impact. This change is not considered a significant impact.

Exhibit 3.6–11 Tree Canopy Analysis Summary, Alternative 3

EXISTING				CHANGE COEFFICIENT		ALTERNATIVE 3 ACRES OF TREE COVER	
Zone	Tree Cover	Zone Change	2016 Acres of Tree Cover	High Scenario	Low Scenario	High Scenario	Low Scenario
Green Space*	29.84%		206.9			206.9	206.9
LR	23.41%	LR to LR	1,096.6	0.00%	0.00%	1,096.6	1,096.6
MR/HR	21.30%	LR to MR/HR	10.4	-2.10%	-1.05%	10.2	10.3
NC/C	13.13%	LR to NC/C	6.7	-10.27%	-5.14%	6.0	6.3
RSL	24.26%	MR/HR to MR/HR	85.7	0.00%	0.00%	85.7	85.7
SF	26.94%	MR/HR to NC/C	0.2	-8.17%	-4.08%	0.2	0.2
		NC/C to NC/C	530.9	0.00%	0.00%	530.9	530.9
		RSL to LR	3.2	-0.85%	-0.43%	3.1	3.1
		SF to LR	201.5	-3.53%	-1.77%	194.4	197.9
		SF to NC/C	8.4	-13.80%	-6.90%	7.3	7.8
		SF to RSL	232.1	-2.68%	-1.34%	225.8	228.9
Total Acres			2,382.5			2,367.0	2,374.7
Total %			20.63%			20.50%	20.56%

*Green space includes parks, cemeteries, public and private schools.

Note: Single Family (SF), Residential Small Lot (RSL), Residential Low Rise (LR), Residential Mid and High Rise (MR/HR), and Neighborhood Commercial and Commercial (NC/C).

Source: ESA, 2017.

Exhibit 3.6–12 Tree Cover by Displacement/Access Group, Alternative 3

ALTERNATIVE 3			
Displacement and Access	Existing Tree Cover*	High Scenario	Low Scenario
High Displacement Risk & High Access to Opportunity	19.58%	19.07%	19.32%
High Displacement Risk & Low Access to Opportunity	19.08%	18.79%	18.93%
Low Displacement Risk & High Access to Opportunity	19.65%	19.34%	19.49%
Low Displacement Risk & Low Access to Opportunity	17.31%	17.02%	17.17%

*Excludes all areas in green spaces.

Source: ESA, 2017.

New to the FEIS

Impacts of the Preferred Alternative, including Exhibit 3.6–13, Exhibit 3.6–14, Exhibit 3.6–15, and Exhibit 3.6–16, is a new section since issuance of the DEIS

IMPACTS OF THE PREFERRED ALTERNATIVE

As described in Chapter 2, the Preferred Alternative assigns development capacity increases with an approach similar to Alternative 3, but places a greater emphasis on proximity to frequent transit nodes. Changes to zoning under the Preferred Alternative would result in the potential for 64,267 new housing units in the planning area, an increase of 41.7 percent, or 18,906 housing units, compared to Alternative 1.

Under the Preferred Alternative, boundary expansions are proposed to the same 10 urban villages as in Alternatives 2 with the exception of Northgate, and Alternative 3. In the Preferred Alternative urban village boundary expansion areas include an approximate 10-minute walkshed for all expanded villages, with greater capacity increases made within an approximate 5-minute walkshed from frequent transit nodes. In the Preferred Alternative urban village boundary expansions are reduced compared to Alternative 2 to avoid expansion in areas with sensitive environmental conditions.

ECAs

The Preferred Alternative would add 98.8 acres within the expanded boundaries, or a 1.1 percent increase from existing conditions (Exhibit 3.6–13). This is approximately 43 acres less than Alternative 2 and 3.5 acres less than Alternative 3. Although the Preferred Alternative includes 10-minute walkshed expansions similar to Alternative 2 it includes 30 percent less ECA land within the expanded areas than Alternative 2. All alternatives would experience very minimal changes in comparison to the current amount of mapped critical areas within the urban villages. As with Alternatives 2 and 3, parcels within areas that have proposed zoning changes may also experience redevelopment due to the changes in the development standards. The current critical areas code would continue to govern development and projects proposed under the regulations would require site analysis to determine the presence of ECAs and subsequent avoidance and minimization of potential impacts.

Exhibit 3.6–14 provides the total acreage of ECAs that intersect in urban villages and expansion areas in the Preferred Alternative. The largest increases in ECA acreage occur in urban villages with high displacement risk, very similar to Alternative 2. Compared to Alternative 2, there are a total of 12.3 fewer acres of ECAs in urban village expansion areas with high displacement risk.

Exhibit 3.6–13 ECA Analysis Summary, Preferred Alternative

ECA Type	Amount (Acres) of Mapped ECA within All Existing Urban Villages	Amount (Acres) of Mapped ECA within All MHA Preferred Alternative Urban Village Expansion Areas
Steep Slope Erosion Areas	375.5	19.1
Slope 40% Areas	481.9	17.4
Potential Slide Areas	259.6	23.1
Known Slide Areas	37.4	0.9
Liquefaction-Prone Areas	6,148.8	22.8
Peat Settlement-Prone Areas	632.8	4.2
Flood-Prone Areas	138.8	—
Wetland Areas	54.7	0.3
Priority Habitats and Species Areas	254.2	11.0
Riparian Corridors	101.3	—
Shoreline Habitat Areas	442.7	—
Total	8,927.7	98.8

Note: Only ECAs that overlap urban villages are shown; other ECA types occur within the City, but are not mapped within the existing and proposed expansion areas of Urban Villages (seismic hazard areas, volcanic hazard areas, abandoned landfills). ECA amounts were calculated using 2017 Seattle GIS data for ECAs and the urban village boundaries used for the alternatives.

Source: ESA, 2017.

Exhibit 3.6–14 ECA and Shoreline District Land Area in MHA Study Area Urban Villages and Expansion Areas (Acres), Preferred Alternative

Neighborhood Type	Existing Urban Villages	Expansion Areas
High Displacement Risk & Low Access to Opportunity	501.9	22.3
Low Displacement Risk & High Access to Opportunity	275.2	3.9
High Displacement Risk & High Access to Opportunity	573.6	43.5
Low Displacement Risk & Low Access to Opportunity	23.3	—

Source: ESA, 2017.

Of the 98.8 acres of ECA area included in expansion areas 61 percent is a steep slope or potential slide area ECAs. Many of these are isolated slopes identified based on topographical data in GIS. In a city with varied topography it is common for developed lands to have slopes, and therefore the presence of isolated slopes on, or at the edges of developable urban land is common and may not represent an environmentally sensitive condition. Of the ECA acreage in expansion areas, 23 percent is in liquefaction-prone areas that are located throughout the floor of the Rainier Valley. These liquefaction prone areas are widespread within the existing Columbia City, North Rainier, and 23rd & Union-Jackson urban villages, and the urban village boundary expansions to the 10-minute watershed would include an increment of additional land with the condition at the edges of these villages.

Tree Canopy

The analysis described above was completed for the zoning changes for the Preferred Alternative. Similar to the other Alternatives, the parcels changing from SF and LR to NC/C under the Preferred Alternative would see the largest change in tree canopy cover if fully developed. Overall, there is currently approximately 22 percent tree canopy coverage within the Preferred Alternative expansion areas. With the zoning changes proposed in the Preferred Alternative, there is the potential for a total loss of between 0.7 and 3.6 acres of tree canopy cover within those expansion areas.

Exhibit 3.6–16 summarizes the existing tree canopy cover for the Preferred Alternative by Displacement Risk and Access to Opportunity categories. In every category, there is less than one percent difference between the existing tree canopy cover and the Preferred Alternative scenario, and in all but one case, less than one-half of one percent (<0.5 percent) difference. In addition, this change in cover is a worst-case scenario based on full development under the proposed zoning.

The Tree Protection Ordinance (SMC 25.11) would not change with the proposed changes in zoning and would regulate all tree removal resulting from implementation of the project. The City does not have a threshold for determining significance of tree loss. Assuming that all tree protection regulations are implemented with future development under the new zoning, the change in tree canopy cover under the Preferred Alternative is not considered a significant impact.

Exhibit 3.6–15 Tree Canopy Analysis Summary, Preferred Alternative

EXISTING				CHANGE COEFFICIENT		PREFERRED ALTERNATIVE ACRES OF TREE COVER	
Zone	Tree Cover	Zone Change	2016 Acres of Tree Cover	High Scenario	Low Scenario	High Scenario	Low Scenario
Green Space*	39.70%		206.2			206.2	206.2
LR	18.81%	LR to LR	1,066.1	0.00%	0.00%	1,066.1	1,066.1
MR/HR	0.00%	LR to MR/HR	15.8	-1.76%	-0.88%	15.6	15.7
NC/C	12.25%	LR to NC/C	10.6	-9.59%	-4.80%	9.6	10.1
RSL	0.00%	MR/HR to MR/HR	86.9	0.00%	0.00%	86.9	86.9
SF	22.24%	MR/HR to NC/C	0.1	-7.84%	-3.92%	0.1	0.1
		NC/C to NC/C	511.4	0.00%	0.00%	511.4	511.4
		RSL to LR	3.3	-7.18%	3.59%	3.0	3.1
		SF to LR	183.7	-2.57%	-1.29%	179.0	181.4
		SF to NC/C	6.0	-12.16%	-6.08%	5.3	5.6
		SF to RSL	308.2	-1.81%	-0.91%	302.6	305.4
		SF to MR/HR	0.5	-4.33%	-2.16%	0.5	0.5
Total Acres			2,398.8			2,386.3	2,392.5
Total %			21.01%			19.09%	19.15%

*Green space includes parks, cemeteries, public and private schools.

Note: Single Family (SF), Residential Small Lot (RSL), Residential Low Rise (LR), Residential Mid and High Rise (MR/HR), and Neighborhood Commercial and Commercial (NC/C).

Source: ESA, 2017.

Exhibit 3.6–16 Tree Cover by Displacement/Access Group, Preferred Alternative

PREFERRED ALTERNATIVE			
Displacement and Access	Existing Tree Cover*	High Scenario	Low Scenario
High Displacement Risk & High Access to Opportunity	20.52%	19.76%	20.14%
High Displacement Risk & Low Access to Opportunity	19.47%	18.75%	19.11%
Low Displacement Risk & High Access to Opportunity	19.82%	19.08%	19.45%
Low Displacement Risk & Low Access to Opportunity**	16.88%	16.26%	16.57%

*Excludes all areas in green spaces.

** There are no Low Displacement Risk & Low Access to Opportunity areas within the Preferred Alternative expansion areas

Source: ESA, 2017.

3.6.3 MITIGATION MEASURES

This section has identified comparative differences in the potential for adverse impacts related to disturbance of ECAs and tree canopy by potential future development. However, none of these identified impacts are concluded to be significant adverse impacts. The following mitigation measures are provided, which would reduce impacts.

REGULATIONS AND COMMITMENTS

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. Existing ECA regulations require a pre-construction survey for development or redevelopment in and near ECAs to determine the presence of significant biological resources, including exceptional trees. Should an ECA be identified, measures would be taken during project design to avoid, minimize, or mitigate the impact to the critical area. Such measures could include redesigning the facility to avoid the sensitive area, or enhancing the sensitive area. For sites with steep slopes and riparian corridors, appropriate building setbacks and erosion control measures would be taken into consideration.

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). Findings from the 2015 and 2016 canopy cover assessments, the regulatory research, and the analysis in this MHA ~~Draft~~ EIS indicate that tree protection codes and incentives are important to protecting, planting, and maintaining trees on private property as the city grows. Current options the City is exploring include:

- Address gaps in current tree protections through training, process, and systems improvements.
- 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 and multifamily residential areas.
- Increase stewardship of conifers, which provide the greatest public benefit and comprise only 28 percent of the canopy.
- 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.

- 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.

Executive Order 2017-11: Tree Protection

In October of 2017, the Mayor signed executive order 2017-11 directing City departments to improve departmental coordination, strengthen enforcement, and adopt new regulations to improve and expand protections for Seattle's urban trees and canopy coverage. The executive order includes specific direction for enforcement adjustment and procedural improvements, tree protection, expanding compliance options, and tree and landscaping requirements. The order is expected to result in updates to SDCI Director's rules regarding Exceptional Trees, removal of hazardous trees, and penalties for removing trees illegally. The order also calls for expansion of compliance options to include in-lieu payment options for tree mitigation. Fees from any-in-lieu payment will be used for mitigating the loss of canopy cover through replanting and reforestation while prioritizing addressing racial and economic disparities in accessing and enjoying the benefits of urban trees. Adjustments pursuant to the order could include providing greater protection for coniferous trees. Implementation of the executive order would mitigate impacts to tree canopy under all alternatives.

Design Review Amendments for Exceptional Tree Retention

In October of 2017, the Seattle City Council passed legislation reforming the design review process. The legislation includes an allowance for an additional 0.5 increment of Floor Area Ratio (FAR) or an additional 10 feet of allowed building height, if protection and retention of an exceptional tree is provided in a development project. Protection of the exceptional tree would be approved as a development standard departures through the design review process. Development projects seeking to use the incentive to preserve an exceptional tree could opt into the design review process whether or not design review thresholds would require design review.

Street Tree Requirements

Development standards in multi-family and commercial zones include required street tree planting. Planting of trees in the public right of

way encourages long-term tree maturation, as the tree is in the public domain. The City Arborist must approve the type of tree and the planting location for street trees.

INCORPORATED PLAN FEATURES

The Action Alternatives include features intended to reduce the negative effects associated with impacts to tree canopy, including the following proposed Land Use Code amendments:

Residential Small Lot Tree Planting Requirement

The proposed action would implement a new tree planting requirement in the Residential Small Lot (RSL) zone. There is currently no such requirement in the zone. Trees must be planted on the lot. The tree planting requirement is based on a scoring system that requires a minimum number of caliper inches of tree based on the lot size. The requirement provides greater weight for the planting of large tree species.

Modification to Green Factor Scoring System

The proposed action includes revision to green factor landscaping requirements scoring system to encourage planting and preservation of trees in new development. Revisions to the scoring system include:

- Less weight for planting of shrubs
- Greater weight for planting or preserving trees
- Remove vegetated walls from elements that meet requirements in residential zones
- Remove water features from elements that meet requirements in all zones
- Greater weight for trees and other vegetation to be placed near the public right of way

3.6.4 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

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

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.

3.7



OPEN SPACE AND RECREATION.

3.7.1 AFFECTED ENVIRONMENT

INTRODUCTION

Seattle Parks and Recreation (SPR) manages a 6,400-acre park system of more than 485 parks and open spaces that comprises about 12 percent of the Seattle's land area.¹ Other open spaces in Seattle include the Chittenden Locks, Olympic Sculpture Park, ~~portions of the Burke-Gilman Trail and Chief Sealth trails,~~ fields and playgrounds associated with public and private schools, waterfront access points provided by the Port of Seattle and the Seattle Department of Transportation, and open spaces on college and university campuses. There are also privately owned open spaces, such as plazas, available to the public.

Projected growth in Seattle would result in increased demand for parks and open space as well as recreation programming and services. Because the Comprehensive Plan guides most population growth to urban centers and urban villages, SPR expects parks and open space demand in those neighborhoods to grow substantially (SPR, 2016). SPR's planning is based on the adopted official growth estimates provided by Puget Sound Regional Council and adopted in the City's Comprehensive Plan, both of which are lower than the amounts analyzed in the action alternatives for MHA implementation. This chapter provides a programmatic assessment of potential impacts to parks and open space in the EIS study area resulting from potential increased housing and employment growth that could result from capacity ~~proposed as part of MHA implementation~~ (see Chapter 2).

¹ Parks and open space include natural areas and greenbelts; community, neighborhood, and regional parks; mini/pocket parks; specialty gardens; community centers; pools; swimming beaches, fishing piers, and boat ramps; golf courses; small craft centers; outdoor camp; and tennis centers.

POLICY FRAMEWORK

This section summarizes plans and policies applicable to the provision of parks and open space in the study area in light of future residential growth.

Seattle 2035 Comprehensive Plan

The Seattle 2035 Comprehensive Plan outlines the City's goal to provide a variety of parks and open space to serve Seattle's growing population in accordance with the priorities identified in the City's Parks Development Plan. Accordingly, the City plans to expand its park holdings and open space opportunities, particularly in urban villages. The City also encourages private developers to incorporate on-site publicly accessible open space (City of Seattle, 2016). In addition, a goal in the Seattle 2035 Comprehensive Plan is to consider access to parks by transit, bicycle, and on foot when acquiring, siting, and designing new park facilities, or improving existing ones. The 2005 Comprehensive Plan provided quantitative, population-based goals for the provision and distribution of open space in urban center villages, hub urban villages, and residential urban villages, as well goals specific to village commons (City of Seattle, 2005). The Seattle 2035 Comprehensive Plan generalizes these open space goals, and the 2017 Parks and Open Space Plan ~~Draft Parks Development Plan~~ provides specific level-of-service (LOS) standards and walkability guidelines (SPR, 2017).

New to the FEIS

The 2017 Parks and Open Space Plan was adopted in August after the DEIS was published. Discussion of prior Parks and Recreation Development Plans was removed from the FEIS—including the 2011 Development Plan, DEIS Exhibit 3.7–1, and DEIS Exhibit 3.7–2—and updated with information on the adopted 2017 plan (see the revised *Seattle Parks and Recreation's 2017 Parks and Open Space Plan* section).

Seattle's Parks and Recreation's 2017 Parks and Open Space Plan Development Plans

~~The Draft 2017 Parks and Open Space Plan~~ The 2017 Parks and Open Space Plan (Parks and Open Space Plan ~~the Draft 2017 Plan~~) is a six-year plan that “documents and describes SPR's facilities and lands, looks at Seattle's changing demographics, and lays out a vision for the future” (SPR, 2017). ~~There are substantial differences between the Draft 2017 Plan and the 2011 Development Plan.~~ In order to maintain a citywide LOS that is compliant with Washington State Recreation and Conservation Office requirements and the Growth Management Act, a citywide population-based standard of 8 acres per 1,000 residents is

Exhibit 3.7–1 2017 Parks and Open Space Plan Citywide LOS Standard

Guidelines/Standard	Location	Description
Population-based LOS	Citywide	8 acres/1,000 residents

Source: SPR, 2017.

proposed in the ~~Draft 2017 Plan, as opposed to the existing 1/3 acre-per 100 residents goal (Exhibit 3.7-1).~~ In addition, ~~the Plan includes the individual urban village population-based open space goals would be replaced with~~ a long-term acquisition strategy based on walkability, in accordance with updates to the Comprehensive Plan.

The Parks and Open Space Plan ~~Draft 2017 Plan also~~ takes a slightly different approach to identifying open space gaps and prioritizing areas for acquisition than previous park development plans by considering a broader range of public resources as parks and open spaces (including public school property, major institutions and universities, and other non-park owned property), and considering equity, ~~and walkability, and socio-economic factors~~ in addition to population density. ~~The proposed LOS standard and the walkability guidelines are summarized in Exhibit 3.7-2.~~ Under the proposed walkability guidelines, it is suggested that parks and open space be within a 5-minute walk within urban villages and be within a 10-minute walk outside of urban villages.

In the Parks and Open Space Plan, the following study area urban villages have been identified as being underserved in parklands as compared to other areas of the city:

- Aurora-Liction Springs
- Bitter Lake
- Northgate
- Ballard
- First Hill
- Fremont
- North Rainier
- North Beacon Hill
- Columbia City
- Othello
- Rainier Beach
- South Park
- West Seattle Junction
- Morgan Junction
- Westwood-Highland Park

Gap areas outside of urban villages that have been traditionally underserved and are home to marginalized populations are also considered included for consideration (e.g., the Georgetown neighborhood and Bitter Lake/Aurora area) (SPR, 2017).

Seattle Municipal Code

In certain zones, Seattle's Land Use Code (SMC Title 23) requires a minimum amount of open space for private development. When required, private open space must meet standards in SMC 23.71.014 and 23.86.018. Open space is often required as an "amenity." In Lowrise multifamily zones, new development must provide an amenity area equal

to 25 percent of the lot area, with at least 50 percent of the amenity area at the ground level. In commercial zones that allow residential development, five percent of residential floor area must be a residential amenity open to the outdoors (City of Seattle, 2016b; City of Seattle, 2016c). Although such open spaces provide benefits to Seattle residents and visitors, they are not counted in the quantities of open spaces analyzed below because they are privately owned.

EXISTING CONDITIONS

Presently, about 43 percent of the City's parks are wholly or partially located in urban villages. But only five percent of total park acreage is located in urban village boundaries (City of Seattle, 2014; City of Seattle, 2014b). Seattle's six urban centers contain the largest number of parks, while the 18 residential urban villages contain the most park acreage. Among individual urban villages, Admiral has the highest share of parkland (12 percent), while parks comprise less than one percent of land in West Seattle Junction, Greenwood-Phinney Ridge, and Morgan Junction (City of Seattle, 2014; City of Seattle, 2014b).

Under the 2015 baseline conditions, the City of Seattle meets the ~~2011 Development Plan goal and 2017~~ citywide LOS standard by providing roughly 9.34 acres of parks and open space per every 1,000 residents and 0.93 acre of parks and open space per every 100 residents (Exhibit 3.7–2).

Exhibit 3.7–2 Baseline Condition Acres of Parks and Open Space per Population

Population (2015)	Acres of Parks and Open Space	Acres of Parks and Open Space per Population
686,800	6,414	9.34 acres per 1,000 residents
		0.93 acre per 100 residents

Source: SPR, 2017.

Exhibit 3.7–3 shows the acreage of parks and open space for each urban village in the study area and the acres of parks and open space per 100 people under baseline conditions in 2015. Although there are no urban village scale population standards, identifying the number of acres of parks and open space per resident population is one measure to indicate how changes in population density could potentially change the relative need for additional parks and open space in urban village or neighborhood areas. Exhibit 3.7–3 also identifies urban villages in the study area that were noted in the ~~2011 and 2017 gap analysis findings as~~ Parks and

Exhibit 3.7–3 Baseline Conditions for Parks and Open Space Provision and Distribution

Urban Village	Acres of Parks and Open Space*	Acres of Parks and Open Space per 100 Residents (2015)**	Walkability Gap is Over Half of Urban Village (2017) <u>Underserved Urban Villages</u>
23rd & Union-Jackson	63.19	0.65	
Admiral	12.33	0.61	
Aurora-Licton Springs	7.55	0.12	X
Ballard	11.54	0.07	<u>X</u>
Bitter Lake Village	10.36	0.18	X
Columbia City	32.16	0.67	<u>X</u>
Crown Hill	4.69	0.2	
Eastlake	6.16	0.09	
First Hill-Capitol Hill	17.73	0.03	<u>X</u>
Fremont	4.25	0.07	<u>X</u>
Green Lake	2.33	0.05	
Greenwood-Phinney Ridge	0.42	0.01	X
Lake City	4.52	0.1	
Madison-Miller	7.85	0.16	
Morgan Junction	0.66	0.03	X
North Beacon Hill	6.28	0.24	X
North Rainier	66.83	1.53	<u>X</u>
Northgate	19.88	0.25	X
Othello	11.52	0.23	X
Rainier Beach	31.52	1.16	<u>X</u>
Ravenna	2.85	0.1	
Roosevelt	0.15	0.01	
South Park	15.39	0.67	<u>X</u>
Upper Queen Anne	0	0	
Wallingford	4.49	0.08	
West Seattle Junction	1.39	0.02	<u>X</u>
Westwood-Highland Park	0	0	X
Outside Urban Villages	6,032	1.56	

* Parks and open space acreage in urban villages was calculated using 2014 SPR GIS data and the urban village boundaries used for the alternatives (minus expansion areas).

** Urban village population figures come from 2015 baseline housing data (Chapter 2) assuming an average household size of 1.78 people. The population outside urban villages assumes 2.06 people per household (City of Seattle, 2016).

Source: SPR, 2014; SPR, 2017.

New to the FEIS

In the FEIS, underserved urban villages identified in the adopted 2017 Parks Development Plan are used as a metric instead of the walkability map metric used in the DEIS.

In addition, the “Open Space Gap is Over Half of Urban Village (2011)” column was removed from DEIS Exhibit 3.7–4 (see amended FEIS Exhibit 3.7–3).

Open Space Plan as being underserved in parklands as compared to other areas of the city having shortages in distribution of open space. For the 2011 Development Plan, an open space gap over half of the urban village indicated that future park acquisition in that urban village would be necessary. Although the 2017 gap analysis has not been finalized, urban villages with walkability gaps over half their area or more are also considered for this analysis. It is likely that such areas would be slated for future acquisition and possible development projects under the 2017 Plan.

Under existing conditions, 44 15 of the study area urban villages were identified as having substantial open space gaps in the 2011 Development Plan and 8 were identified as having substantial walkability gaps in the Draft 2017 Plan being underserved..

3.7.2 IMPACTS

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, or the acreage of park and open space land available relative to a specific number of people. Impacts to parks and open space users may be in the form of 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. Population growth without a commensurate increase in the quantity of parks and open space decreases availability. 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.

To assess impacts to parks and open space, this Chapter uses SPR's 2011 distribution goal of 1/3 (0.33) acre of parks and open space land for every 100 residents citywide, hereafter referred to as the 2011 distribution goal, and the 8 acres per every 1,000 residents (0.80 acre per 100 residents citywide) LOS, hereafter referred to as the 2017 citywide LOS.

Exhibit 3.7–4 LOS Evaluation of Alternatives

	ALTERNATIVE 1 (2017 PARKS PLAN)*			ACTION ALTERNATIVES 2- AND-ALTERNATIVE-3**		
	Population	Acres Parkland	Acres / 1,000 Residents	Population	Acres Parkland	Acres / 1,000 Residents
2015	686,800	6,414	9.34	686,800	6,414	9.34
2035	806,800	6,414	7.95	855,900	6,414	7.49
<i>Additional Acres of Parkland Needed to Meet LOS by Seattle 2035</i>		40			434	
<i>With Additional Park Land</i>		6,454	8.00		6,791	8.00

* Growth estimated in the 2017 Parks Plan is considered as the No Action scenario for this analysis.

** A rounded, 95,000 additional household growth amount is assumed for the action alternatives (*Alternative 2, Alternative 3, and the Preferred Alternative*) for the purposes of this analysis. Average household size is 1.78 persons per household.

Source: SPR, 2017.

Although not a LOS metric, the analysis also considers the findings of the 2011 and 2017 gap analyses in that they indicate areas where there are deficiencies in the existing parks and open space network. A project impact comes in the form of decrease in parks availability, as these urban villages will have more residents populating areas that may not have adequate park resources. All of the alternatives would meet the 2011 distribution goal. However, none of the alternatives would meet the 2017 citywide population-based LOS. Exhibit 3.7–4 describes how many additional acres of park and open space land would need to be acquired for the 2017 citywide LOS to be met. Under Alternative 1, 40 acres of park and open space land would need to be required, and under Alternatives 2, and 3, and the Preferred Alternative, approximately 434 acres would be required.

Significant impacts are only assigned to proposals that would result in the City not meeting the citywide 2017 LOS.

For analysis purposes in this EIS, the population density per acre of park land is also assessed at the urban village level to better understand the distribution of impacts associated with the various alternatives. Exhibit 3.7–5 compares parks and open space availability by urban village under each alternative. All alternatives anticipate housing growth over the 20-year planning horizon both inside and outside urban villages, with Alternatives 2 and 3 and the Preferred Alternative directing more growth to urban villages than Alternative 1. To better understand the changes that would occur as a result of each of the action alternatives, the impact assessment focuses on how demand for parks and open space would change in urban villages in the study area, particularly those identified

New to the FEIS

In the FEIS, underserved urban villages identified in the adopted 2017 Parks Development Plan are used as a metric instead of the walkability map metric used in the DEIS.

In addition, the “Open Space Gap (2011)” column was removed from DEIS Exhibit 3.7–6 (see amended FEIS Exhibit 3.7–5 on the next page).

Exhibit 3.7-5 Comparison of Parks and Open Space Availability Across Alternatives

**URBAN VILLAGE PARKS AND OPEN SPACE AVAILABILITY
(ACRES OF PARKS AND OPEN SPACE PER 100 RESIDENTS)**

	Baseline (2015)	Alternative 1 No Action	Alternative 2	Alternative 3	Preferred Alternative	Walkability-Gap- (2047) Underserved Urban Villages
High Displacement Risk & Low Access to Opportunity						
Rainier Beach	1.16	0.88 (24%)	0.55 (53%)	0.57 (51%)	<u>0.97 (16%)</u>	X
Othello	0.23	0.17 (26%)	0.33 (+43%)	0.19 (17%)	<u>0.27 (+17%)</u>	X
Westwood-Highland Park	0.00	0.00 (0%)	0.00 (0%)	0.00 (0%)	<u>0.00 (0%)</u>	X
South Park	0.67	0.51 (24%)	0.45 (33%)	0.47 (30%)	<u>0.47 (30%)</u>	X
Bitter Lake Village	0.18	0.13 (28%)	0.12 (33%)	0.12 (33%)	<u>0.12 (33%)</u>	X
Low Displacement Risk & High Access to Opportunity						
Green Lake	0.05	0.04 (20%)	0.04 (20%)	0.03 (40%)	<u>0.04 (20%)</u>	
Roosevelt	0.01	0.00 (100%)	0.00 (100%)	0.00 (100%)	<u>0.00 (100%)</u>	
Wallingford	0.08	0.06 (25%)	0.05 (38%)	0.05 (38%)	<u>0.05 (38%)</u>	
Upper Queen Anne	0.00	0.00 (0%)	0.00 (0%)	0.00 (0%)	<u>0.00 (0%)</u>	
Fremont	0.07	0.05 (29%)	0.05 (29%)	0.05 (29%)	<u>0.05 (29%)</u>	X
Ballard	0.07	0.05 (29%)	0.04 (43%)	0.04 (43%)	<u>0.06 (14%)</u>	X
Madison-Miller	0.16	0.12 (25%)	0.11 (31%)	0.10 (38%)	<u>0.10 (38%)</u>	
Greenwood-Phinney Ridge	0.01	0.01 (0%)	0.01 (0%)	0.01 (0%)	<u>0.01 (0%)</u>	X
Eastlake	0.09	0.07 (22%)	0.07 (22%)	0.07 (22%)	<u>0.07 (22%)</u>	
West Seattle Junction	0.02	0.01 (50%)	0.01 (50%)	0.01 (50%)	<u>0.01 (50%)</u>	X
Admiral	0.61	0.48 (21%)	0.46 (25%)	0.43 (30%)	<u>0.44 (28%)</u>	
Crown Hill	0.20	0.13 (35%)	0.06 (70%)	0.05 (75%)	<u>0.10 (50%)</u>	
Ravenna (2)	0.10	0.05 (50%)	0.05 (50%)	0.05 (50%)	<u>0.05 (50%)</u>	
High Displacement Risk & High Access to Opportunity						
Columbia City	0.67	0.52 (22%)	0.24 (64%)	0.25 (63%)	<u>0.48 (28%)</u>	X
Lake City	0.10	0.07 (30%)	0.07 (30%)	0.07 (30%)	<u>0.07 (30%)</u>	
Northgate	0.25	0.15 (40%)	0.06 (76%)	0.06 (76%)	<u>0.12 (52%)</u>	X
First Hill-Capitol Hill	0.03	0.03 (0%)	0.02 (33%)	0.03 (0%)	<u>0.03 (0%)</u>	X
North Beacon Hill	0.24	0.19 (21%)	0.08 (67%)	0.09 (63%)	<u>0.17 (29%)</u>	X
North Rainier	1.53	1.09 (29%)	0.64 (58%)	0.65 (58%)	<u>1.17 (23%)</u>	X
23rd & Union-Jackson	0.65	0.50 (23%)	0.38 (42%)	0.33 (49%)	<u>0.64 (1%)</u>	
Low Displacement Risk & Low Access to Opportunity						
Aurora-Liction Springs	0.12	0.10 (17%)	0.09 (25%)	0.09 (25%)	<u>0.09 (25%)</u>	X
Morgan Junction	0.03	0.02 (33%)	0.02 (33%)	0.02 (33%)	<u>0.02 (33%)</u>	X
Outside Villages	1.56	1.47 (6%)	1.43 (8%)	1.44 (8%)	<u>1.36 (13%)</u>	

Note: The acres of parks and open space within the urban villages were calculated using 2014 Seattle Parks GIS data and the urban village boundaries used for the alternatives. The number of residents residing within urban villages was calculated using housing data provided in Chapter 2, with an average household of 1.78 residents per housing unit applied for urban villages and 2.06 residents per housing unit applied for areas outside urban villages (City of Seattle, 2016).

Source: SPR, 2014; SPR, 2011.

~~as having open space gaps or walkability gaps in the 2011 Development Plan or the Draft 2017 Plan, respectively.~~

However, it is important to note that 95 percent of City parks and open space land is outside of urban village boundaries. Therefore, it is likely that parks and open space near urban villages that lack sufficient facilities would also experience greater demand as the urban village populations grow. This growth would exacerbate existing deficiencies.

IMPACTS OF 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). Although Alternative 1 would meet the 2011 distribution goal, it would not meet the 2017 citywide LOS unless 40 acres of park and open space land is acquired. According to the ~~Draft 2017~~ Parks and Open Space Plan, acquiring the land to mitigate for projected growth under Alternative 1 is feasible (SPR, 2017). Therefore, existing and future parks and open space resources can serve the growth anticipated under the Seattle 2035 Comprehensive Plan, even though gaps in geographic availability or shortfalls from optimal location, size, or number of parks could remain over the long-term.

Exhibit 3.7–6 details the urban villages identified as having ~~open space~~ and/or walkability gaps and the potential reductions in park availability

Housing and job growth over the 20-year planning period would generate more demand for parks, recreation facilities, and open space across the city. Urban villages would see residential growth that would proportionately increase demand for parks and open space close to these areas. As certain urban villages have an existing shortage relative to the goal, growth would widen the existing gap between supply of and demand for parks and open space, resulting in less availability, particularly in the urban villages identified in Exhibit 3.7–6. Impacts could also occur on parks and open space in urban villages served by current and future light rail transit as these parks and open spaces would become more accessible to people residing elsewhere. Light rail stations in urban villages also make parks and open spaces outside the urban villages more available to urban village residents. ~~In addition, there would also~~

be an increased potential for impacts on parks and open space in urban villages served by current and future light rail transit as these parks and open spaces would become more accessible to people residing outside of the urban villages.

Significant open space Walkability gaps in single-family areas in northwest Seattle, northeast Seattle, and West Seattle would likely continue. As neighborhoods outside urban villages grow under Alternative 1, impacts on parks and recreation could increase as demand for parks and open space would likely increases.

Exhibit 3.7–6 Changes in Park Availability in Underserved Urban Villages with Open Space and/or Walkability Gaps, Alternative 1 No Action

URBAN VILLAGE PARKS AND OPEN SPACE AVAILABILITY (ACRES OF PARKS AND OPEN SPACE PER 100 RESIDENTS) IN UNDERSERVED URBAN VILLAGES

New to the FEIS

The “Open Space Gap (2011)” and “Walkability Gap (2017)” columns were removed from DEIS Exhibit 3.7–7 (see amended FEIS Exhibit 3.7–6).

	Baseline (2015)	Alternative 1 No Action
High Displacement Risk & Low Access to Opportunity		
Rainier Beach	1.16	0.88 (24%)
Othello	0.23	0.17 (26%)
South Park	0.67	0.51 (24%)
Bitter Lake Village	0.18	0.13 (28%)
Low Displacement Risk & High Access to Opportunity		
Fremont	0.07	0.05 (29%)
Ballard	0.07	0.05 (29%)
West Seattle Junction	0.02	0.01 (50%)
Ravenna (2)	0.10	0.05 (50%)
High Displacement Risk & High Access to Opportunity		
Columbia City	0.67	0.52 (22%)
Northgate	0.25	0.15 (40%)
North Beacon Hill	0.24	0.19 (21%)
North Rainier	1.53	1.09 (29%)
Low Displacement Risk & Low Access to Opportunity		
Aurora-Liction Springs	0.12	0.10 (17%)
Morgan Junction	0.03	0.02 (33%)

Note: The acres of parks and open space within the urban villages were calculated using 2014 Seattle Parks GIS data and the urban village boundaries used for the alternatives. The number of residents residing within urban villages was calculated using housing data provided in Chapter 2, with an average household of 1.78 residents per housing unit applied for urban villages and 2.06 residents per housing unit applied for areas outside urban villages (City of Seattle, 2016).

Source: SPR, 2014; SPR, 2011/2017.

IMPACTS OF ALTERNATIVE 2

Growth under Alternative 2 would have similar types of impacts to Alternative 1, but to a larger degree due to the potential for more growth.

Under Alternative 2, Othello would have an increase in parks and open space availability because urban village boundaries would expand to include existing parkland. Population and job growth in Alternative 2 would generate more demand for parks and open space than Alternative 1 in study area urban villages. This impact would be greatest in urban villages with the largest increases in growth under Alternative 2 compared to Alternative 1, such as North Beacon Hill, Columbia City, Ballard, Northgate, First Hill-Capitol Hill, North Beacon Hill, Rainier Beach, and North Rainier, and Aurora-Licton Springs (Exhibit 3.7–7).

Exhibit 3.7–7 Changes in Park Availability in Underserved Urban Villages with Open Space and/or Walkability Gaps, Alternative 2

URBAN VILLAGE PARKS AND OPEN SPACE AVAILABILITY (ACRES OF PARKS AND OPEN SPACE PER 100 RESIDENTS) IN UNDERSERVED URBAN VILLAGES

	Baseline (2015)	Alternative 2
High Displacement Risk & Low Access to Opportunity		
<u>Rainier Beach</u>	1.16	0.55 (53%)
Othello	0.23	0.33 (+43%)
<u>South Park</u>	0.67	0.45 (33%)
Bitter Lake Village	0.18	0.12 (33%)
Low Displacement Risk & High Access to Opportunity		
Fremont	0.07	0.05 (29%)
Ballard	0.07	0.04 (43%)
West Seattle Junction	0.02	0.01 (50%)
Ravenna (2)	0.10	0.05 (50%)
High Displacement Risk & High Access to Opportunity		
<u>Columbia City</u>	0.67	0.24 (64%)
Northgate	0.25	0.06 (76%)
First Hill-Capitol Hill	0.03	0.02 (33%)
North Beacon Hill	0.24	0.08 (67%)
North Rainier	1.53	0.64 (58%)
Low Displacement Risk & Low Access to Opportunity		
Aurora-Licton Springs	0.12	0.09 (25%)
Morgan Junction	0.03	0.02 (33%)

Note: The acres of parks and open space within the urban villages were calculated using 2014 Seattle Parks GIS data and the urban village boundaries used for the alternatives. The number of residents residing within urban villages was calculated using housing data provided in Chapter 2, with an average household of 1.78 residents per housing unit applied for urban villages and 2.06 residents per housing unit applied for areas outside urban villages (City of Seattle, 2016).

Source: SPR, 2014; SPR, 2011/2017.

New to the FEIS

The “Open Space Gap (2011)” and “Walkability Gap (2017)” columns were removed from DEIS Exhibit 3.7–8 (see amended FEIS Exhibit 3.7–7).

IMPACTS OF ALTERNATIVE 3

Impacts to parks and open space in under Alternative 3 would be similar to Alternative 2. Compared to Alternative 2, urban villages across the study area would see similar level of parks and open space availability reduction; however, with the different distribution of growth, certain urban villages would experience higher percentages of growth than under Alternative 2. ~~However, overall, there would be~~ similar reductions in park and open space availability would occur under Alternatives 2 and 3 in most of the underserved urban villages ~~with walkability or distribution gaps~~ (Exhibit 3.7–8). However, under Alternative 3 there would be less of a decrease in availability in First Hill–Capitol Hill, and North Beacon Hill, South Park, and Columbia City. In addition, under Alternative 3 the Othello Urban Village would experience a reduction in parks and open space availability due to its smaller boundary expansion.

Exhibit 3.7–8 Changes in Park Availability in Underserved Urban Villages ~~with Open Space and/or Walkability Gaps~~, Alternative 3

URBAN VILLAGE PARKS AND OPEN SPACE AVAILABILITY (ACRES OF PARKS AND OPEN SPACE PER 100 RESIDENTS) IN UNDERSERVED URBAN VILLAGES

New to the FEIS

The “Open Space Gap (2011)” and “Walkability Gap (2017)” columns were removed from DEIS Exhibit 3.7–8 (see amended FEIS Exhibit 3.7–8).

	Baseline (2015)	Alternative 3
High Displacement Risk & Low Access to Opportunity		
<u>Rainier Beach</u>	<u>1.16</u>	<u>0.57 (51%)</u>
Othello	0.23	0.19 (17%)
<u>South Park</u>	<u>0.67</u>	<u>0.47 (30%)</u>
Bitter Lake Village	0.18	0.12 (33%)
Low Displacement Risk & High Access to Opportunity		
Fremont	0.07	0.05 (29%)
Ballard	0.07	0.04 (43%)
West Seattle Junction	0.02	0.01 (50%)
Ravenna (2)	0.40	0.05 (50%)
High Displacement Risk & High Access to Opportunity		
<u>Columbia City</u>	<u>0.67</u>	<u>0.25 (63%)</u>
Northgate	0.25	0.06 (76%)
North Beacon Hill	0.24	0.09 (63%)
North Rainier	1.53	0.65 (58%)
Low Displacement Risk & Low Access to Opportunity		
Aurora-Licton Springs	0.12	0.09 (25%)
Morgan Junction	0.03	0.02 (33%)

Note: The acres of parks and open space within the urban villages were calculated using 2014 Seattle Parks GIS data and the urban village boundaries used for the alternatives. The number of residents residing within urban villages was calculated using housing data provided in Chapter 2, with an average household of 1.78 residents per housing unit applied for urban villages and 2.06 residents per housing unit applied for areas outside urban villages (City of Seattle, 2016).

Source: SPR, 2014; SPR, 2017.

IMPACTS OF THE PREFERRED ALTERNATIVE

Impacts to parks and open space under the Preferred Alternative would be similar to Alternatives 2 and 3. Urban villages across the study area would see similar levels of reduced parks and open space availability; however, with the different distribution of growth, certain urban villages would experience higher percentages of growth than under the other build alternatives. Overall, there would be similar reductions in park and open space availability in most of the underserved urban villages (Exhibit 3.7–9). However, the Preferred Alternative would not result in any of the urban villages having a greater decrease in park and open space availability than either of the other action alternatives. In addition, there would be less of a decrease in availability in Rainier Beach, Ballard, Columbia City, Northgate, North Beacon Hill, and North Rainier than under Alternatives 2 or 3. The Preferred Alternative would also result in

New to the FEIS

Impacts of the Preferred Alternative, including Exhibit 3.7–9, is a new section since issuance of the DEIS

Exhibit 3.7–9 Changes in Park Availability in Underserved Urban Villages, Preferred Alternative

PARKS AND OPEN SPACE AVAILABILITY (ACRES OF PARKS AND OPEN SPACE PER 100 RESIDENTS) IN UNDERSERVED URBAN VILLAGES

	Baseline (2015)	Preferred Alternative
High Displacement Risk & Low Access to Opportunity		
Rainier Beach	1.16	0.97 (16%)
Othello	0.23	0.27 (+17%)
South Park	0.67	0.47 (30%)
Bitter Lake Village	0.18	0.12 (33%)
Low Displacement Risk & High Access to Opportunity		
Fremont	0.07	0.05 (29%)
Ballard	0.07	0.06 (14%)
West Seattle Junction	0.02	0.01 (50%)
High Displacement Risk & High Access to Opportunity		
Columbia City	0.67	0.48 (28%)
Northgate	0.25	0.12 (52%)
First Hill-Capitol Hill	0.03	0.03 (0%)
North Beacon Hill	0.24	0.17 (29%)
North Rainier	1.53	1.09 (29%)
Low Displacement Risk & Low Access to Opportunity		
Aurora-Licton Springs	0.12	0.09 (25%)
Morgan Junction	0.03	0.02 (33%)

Note: The acres of parks and open space within the urban villages were calculated using 2014 Seattle Parks GIS data and the urban village boundaries used for the alternatives. The number of residents residing within urban villages was calculated using housing data provided in Chapter 2, with an average household of 1.78 residents per housing unit applied for urban villages and 2.06 residents per housing unit applied for areas outside urban villages (City of Seattle, 2016).

Source: SPR, 2014; SPR, 2017.

less of a decrease in availability in Rainier Beach and Ballard than under Alternative 1. Also, there would be an increase in parks and open space availability in Othello (due to expanded urban village boundaries), but it would be less than under Alternative 2.

The Preferred Alternative would result in a greater decrease in parks and open space availability outside of urban villages (Exhibit 3.7–5). However, this is likely due to there being a larger number of urban village expansion areas, resulting in more existing parks and open space being located within urban villages.

3.7.3 MITIGATION MEASURES

Given greater overall demand for parks and open space in the study area, SPR should consider these MHA growth projections for the next open space gap analysis to address future potential impacts through the next (2023) Development Plan. According to the 2017 citywide LOS, approximately 40 acres of new parks and open space land would be required under Alternative 1 by 2035, and approximately 434 acres would be required under Alternatives 2 and 3. Provision of additional parks and open space land should occur in urban villages with substantial walkability gaps 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. The City could study and develop a recommendation for a Parks and Open Space impact fee on new development to support the acquisition of new park land. However, decision-makers would need to evaluate such an impact fee in conjunction with potential impacts fees for other services, including public schools.

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.

The City will support community-led efforts to increase benefits from existing parks by extending the hours of operation of certain recreational facilities and working with community groups to provide more activities and programming that serve a larger and more diverse group of park users. In addition, the City will create additional public open space through partnerships with Seattle Public Schools, Seattle Public Utilities, and the Seattle Department of Transportation. By upgrading schoolyards, building drainage facilities that also provide open space, and providing play streets and other public space in street rights-of-way, the City will be able to increase the amount of parks and open space. The City will also work to improve pedestrian, bike, and transit connections to nearby parks.

In future planning processes, SPR could modify the citywide level of service standard to consider the quality of facilities and availability of SPR programs and services, in addition to, or instead of, a standard based solely on parks acreage per population.

3.7.4 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Development under Alternatives 1, 2 and 3 would have significant adverse impacts to parks and open space. However, these impacts can be avoided through mitigation as described above. Future growth under all EIS alternatives would result in significant adverse impacts to the availability and accessibility of parks and open space. The impacts would be experienced in the form of increased crowding in parks, longer wait times to use facilities for some activities, or a need to travel longer distances to access available park facilities. The impacts of implementing MHA would affect community members differently depending on when and how they use park facilities. However, under all of the alternatives, the City as a whole would not meet the citywide LOS and the overall impact is considered to be significant. It is expected that the significant impact could be reduced to a less-than-significant level if some combination of the mitigation measures described above are utilized.



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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.

3.8



PUBLIC SERVICES AND UTILITIES.

This chapter discusses Public Services and Utilities potentially affected by the HALA Mandatory Housing Affordability (MHA) program. Public services and utilities include: Police Services, Fire and Emergency Medical, Public Schools, Water, Sewer and Drainage and Electricity. Impacts on public parks and recreation are evaluated in Section 3.7 Open Space and Recreation.

Analysis includes comparison of the impacts on public services and utilities associated with growth as a result of the proposed project under the alternatives. Impacts are summarized at the citywide scale, with a focus on the Urban Villages (UVs) and their proposed expansion areas at a neighborhood scale.

3.8.1 AFFECTED ENVIRONMENT

The existing conditions described below are based on the City of Seattle's 2035 Comprehensive Plan EIS. Public services and utilities that were not analyzed as a part of the Comprehensive Plan but would be affected by the MHA program were identified and added to this analysis.

The City of Seattle is currently experiencing a construction boom, with over 17,000 housing units in the permitting pipeline or under construction as of December 2016. As a result, there is an associated increase in population and use of public services and utilities.

PUBLIC SERVICES

Police Services

The City of Seattle Police Department serves five precincts within the city's jurisdictional boundary: north, west, east, south and southwest. Urban villages within each precinct are as follows:

- **North Precinct:** University District, Northgate, Ballard, Bitter Lake, Fremont, Lake City, Aurora-Licton Springs; Crown Hill, Green Lake, Greenwood-Phinney Ridge, Roosevelt, Wallingford, and Ballard-Interbay-Northend
- **East Precinct:** First/Capitol Hill, 23rd & Union-Jackson, Eastlake, and Madison-Miller
- **West Precinct:** Downtown South Lake Union, Uptown, Upper Queen Anne, Ballard-Interbay-Northend, and Greater Duwamish
- **South Precinct:** Columbia City, North Beacon Hill, Othello, and Rainier Beach
- **Southwest Precinct:** West Seattle Junction, Admiral, Morgan Junction, South Park, Westwood-Highland Park, and Greater Duwamish

Services such as patrol officers and 9-1-1 responders, bike patrol, anti-crime team, on-site liaison attorney, burglary/theft detectives, community police teams and crime prevention are provided depending on the specific characteristics and needs of each precinct (City of Seattle, 2015).

The Seattle 2035 Comprehensive Plan made the following observations with respect to existing capacity:

- The South Precinct station is currently near capacity for staffing space and in need of seismic upgrades. If additional staff were hired, it is likely that the station would be renovated (possibly including a building addition), additional parking would be provided, and seismic upgrades would be made.
- Increased staffing in the North Precinct over the next 20 years will be accommodated at a planned facility located at the intersection of North 130th Street and Aurora Avenue North. This station will provide sufficient building area to meet the needs of both existing and future staff. Land for the North Precinct facility has already been acquired.
- In other precincts, no growth-related facility needs are identified at this time. The Southwest Precinct station has capacity for 13 additional staff members, which will likely be sufficient to accommodate staffing for the 20-year planning period. Ongoing planning is conducted for the East and West precincts to help determine staffing and related facility needs (if any) in the coming year.

The Seattle Police Department established an average emergency response time target of seven minutes, which it currently meets (City of Seattle, 2035).

Fire and Emergency Medical Services

The Seattle Fire Department provides a full-range of fire protection, prevention and emergency medical services, which are defined citywide in service areas allocated through battalions and stations. Urban villages within each applicable Battalion are as follows:

- **Battalion 2:** Downtown, First/Capitol Hill, South Lake Union, Madison-Miller
- **Battalion 4:** Uptown, Ballard, Bitter Lake, Fremont, Crown Hill, Greenwood-Phinney Ridge, Upper Queen Anne, Wallingford, Ballard-Interbay-Northend
- **Battalion 5:** First/Capitol Hill, 23rd & Union-Jackson, Columbia City, North Beacon Hill, Othello, Rainier Beach, Greater Duwamish
- **Battalion 6:** University District, Northgate, Lake City, Aurora-Licton Springs, Eastlake, Green Lake, Roosevelt, Wallingford
- **Battalion 7:** West Seattle Junction, Admiral, Morgan Junction South Park, Westwood-Highland Park, Greater Duwamish

The Seattle Fire Department responds to emergency medical services (EMS) and fire incidents, of which approximately 80 percent are EMS related. The Seattle Fire Department monitors and documents response times based on the National Fire Protection Association (NFPA) Standard Guidelines. Response standards are established by specifying the minimum criteria for effectively and efficiently delivering fire suppression and emergency medical services. The target is to meet the NFPA standards 90 percent of the time. On average, the department currently meets EMS response standards 86 percent of the time and fire response standards 89 percent of the time (City of Seattle, 2015).

The Seattle Comprehensive Plan identified anticipated increases in service demands for fire protection in the following areas:

- Fire Station 2 in South Lake Union Urban Center—new fire station planned due to growth in the area;
- Fire Station 31 in portions of Bitter Lake, Aurora-Licton Springs, Crown Hill and Greenwood-Phinney Ridge urban villages. Fire Station 31 is the second busiest engine company in the city, and additional fire resources may be necessary to address current and projected growth (City of Seattle, 2015).

According to the EMS Demand Forecast model, a study of emergency medical services demand based on demographics, EMS services are

likely to be needed in the following neighborhoods/urban villages due to projected demand:

- Denny Regrade (Uptown Urban Center);
- South Lake Union (South Lake Union Urban Center);
- Broadview—Bitter Lake—Haller Lake (multiple urban villages and surrounding areas);
- Aliko/Admiral (multiple urban villages and surrounding areas); and
- Rainier Valley (multiple urban villages and surrounding areas).

Public Schools

Seattle Public Schools (SPS) provides public education from kindergarten through 12th grade. The Comprehensive Plan analyzed public schools through sectors. Additional analysis in this EIS analyzes schools using Seattle Public Schools attendance areas (Exhibit 3.8–1). ~~Sectors and their respective urban villages are included below:~~

- ~~**Sector 1:** Ballard, Fremont, Aurora-Licton Springs, Green Lake, Greenwood-Phinney Ridge, Wallingford;~~
- ~~**Sector 2:** Northgate, Lake City, Roosevelt;~~
- ~~**Sector 3:** Uptown;~~
- ~~**Sector 4:** Eastlake;~~
- ~~**Sector 5:** First/Capitol Hill, 23rd & Union-Jackson, Madison-Miller;~~
- ~~**Sector 6:** Admiral, Morgan Junction;~~
- ~~**Sector 7:** South Park; and~~
- ~~**Sector 8:** North Rainier, Columbia City, North Beacon Hill, Rainier Beach.~~

The Seattle Public Schools 2012 Facilities Master Plan (SPS, 2012) identified enrollment projections through 2022 for elementary, middle and high schools in Seattle. The projection is 13 years shorter than the 2035 planning horizon of the Seattle Comprehensive Plan. The Facilities Master Plan estimates that the projected growth of 9,000 students would surpass the existing capacity. Student enrollment is anticipated to grow with population increase, which would affect future capacity (City of Seattle, 2015). To address anticipated enrollment analyzed in the Facilities Master Plan, the Building Excellence (BEX) Phase IV capital program would construct 18 new or replacement schools and provide seismic upgrades for 37 additional schools, adding capacity for 7,900

additional students. Projects currently underway as parts of the BEX Phase IV Program include:

- Arbor Heights Elementary, replacement of existing school on the same site;
- Bagley Elementary: modernization and addition of classroom and core facilities;
- Fairmount Park Elementary: modernization and addition of classroom and core facilities;
- Jane Addams Building: re-purpose as a middle school;
- ~~Jane Addams~~ Hazel Wolf K-8: new replacement;
- Lincoln Building: modernize and repurpose as a comprehensive high school;
- Loyal Heights Elementary: modernize and add classroom and core facilities;
- Meany Middle School: modernize and repurpose;
- Northeast Elementary: new construction with a capacity of 500-650 seats;
- Nova Alternative High School: modernize and add classroom and core facilities;
- Olympic Hills Elementary: replacement of existing school on same site;
- Queen Anne Elementary: add classroom and core facilities;
- Schmitz Park Elementary: repurposing for elementary seats, ~~construction of a new building;~~
- New construction of Genesee Hill elementary;
- ~~Wilson Pacific Elementary and Middle School: new construction;~~
- New construction of Robert Eagle Staff Middle School and Cascadia Elementary School;
- Wing Luke Elementary: replacement of existing school on same site; and
- World School at T.T. Minor: repurpose and modernize.

An important element to public school infrastructure capacity includes sidewalks that are used for transportation to and from schools. SDOT identifies the preferred routes through their *Safe Routes to School* program. Out of the 105 schools in the SPS school district, approximately 25 are missing sidewalk infrastructure (City of Seattle, 2015). Of these, urban villages that are near or contain schools lacking full sidewalk infrastructure walking routes include: Northgate, Bitter Lake, Lake City, North Beacon Hill, Othello, Rainier Beach, South Park, Crown Hill, and Greater Duwamish.

New to the FEIS

FEIS Exhibit 3.8–1 is new
since issuance of the DEIS

To provide additional analysis in this FEIS data on school enrollment and capacity are provided for the SPS middle school service areas. All K-8 students in elementary schools within a middle school pathway plus the middle school students in the middle school are summarized by the school service area. Likewise, the total school capacity within elementary schools and middle schools within the school service area are aggregated. Analysis by school service areas provides an overview of school enrollment and capacity issues that is matched to SPS reports and analysis, and by geographic area of the city.. A map of SPS middle school service areas is provided at right as Exhibit 3.8–1.

In December of 2015, City Council passed Ordinance 124919 directing Seattle’s Office of Planning and Community Development, in coordination with the Department of Education and Early Learning and Seattle Public Schools, to develop planning strategies that support the District’s public school facility needs for anticipated student population consistent with adopted comprehensive plan policies and growth forecasts. The City of Seattle and SPS are engaged in coordination efforts to identify opportunities and sites for new school facilities. Ongoing efforts include exploration of sites for possible downtown elementary and high schools.



Exhibit 3.8-1 SPS Attendance Area

UTILITIES

Water, Sewer, and Drainage Systems

Municipal water is provided to Seattle Public Utilities (SPU) customers from the Cedar River watershed and the South Fork of Tolt Reservoir, and a small amount of groundwater is obtained from the SPU's Seattle Well Fields located south of the City. Approximately 1,880-miles of transmission and distribution pipes distribute water to Seattle retail and wholesale customers (City of Seattle, 2015).

Capacity and system needs are monitored by the Puget Sound Regional Council and Washington Office of Financial Management, which uses a 20 year water demand forecast based on various factors, including growth projections. The existing water system currently has excess capacity to accommodate population growth anticipated in the Seattle 2035 Comprehensive Plan, due to declining average household usage (City of Seattle, 2015). To control demand, SPU uses management strategies, such as water availability certificates and developer improvements (City of Seattle Draft EIS, 2015).

SPU drainage infrastructure includes three types of systems: combined (carries sewage and stormwater through one pipe to a wastewater treatment plant (WWTP)), fully separated (separate piped systems for stormwater and sanitary sewers, which discharge to surface water and a WWTP, respectively) and partially separated sewer and storm drain systems (roads drain to stormwater system, where the street runoff discharges to surface waters, but roofs drains and private property drainage discharges to the combined system), each serving approximately one-third of the City of Seattle. King County Wastewater Treatment Division (KC) and SPU own and operate combined sewer systems that serve about one-third of the city. Each combined sewer system is a piped network carrying both sanitary wastewater and stormwater runoff to a King County WWTP (City of Seattle, 2015).

New developments and redevelopments are typically required to comply with the following measures that ensure available water and drainage capacity prior to permit issuance.

Water Availability Certificates and Conservation. SPU uses a hydraulic network model to evaluate capacity and make a determination of water availability. If there is a gap between what the existing system can provide and what a development needs, the developer is required to upgrade the existing system to meet demand (SPU 2012). New

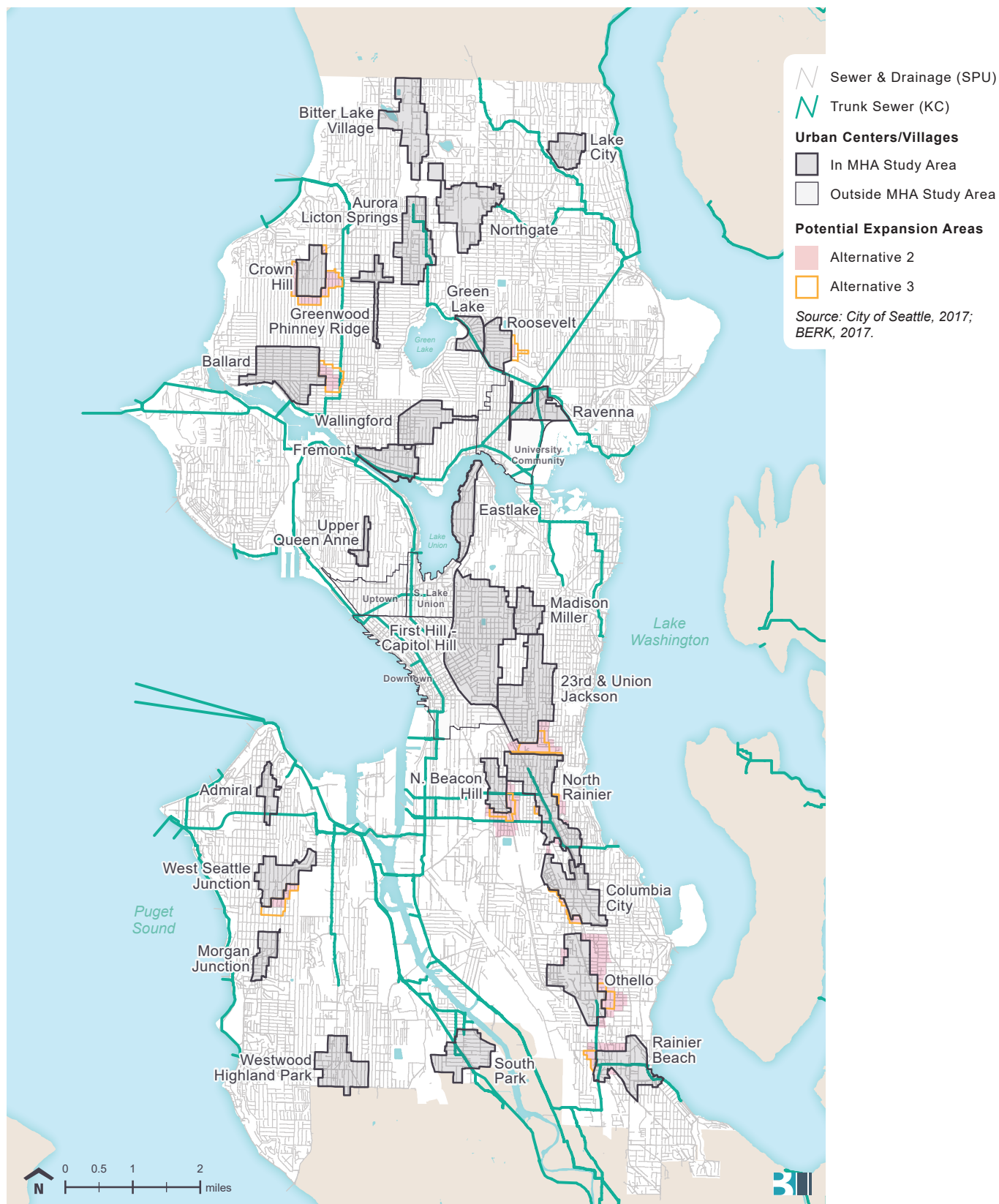


Exhibit 3.8-2 SPU Combined Pipe and KC Metro Wastewater Systems

development and redevelopment is required by the plumbing code to include efficient plumbing fixtures. This requirement will reduce the overall impact to water demand resulting from the proposed alternatives (Seattle 2035 Comprehensive Plan).

Developer Sewer Improvements. In areas that are not designated as capacity constrained, developers are required to demonstrate that the downstream stormwater system has sufficient capacity for additional flow. Some parts of the City are served by sewers that are less than 12-inch diameter. These areas are likely at or near their capacity and downstream pipes from new development would have to be upgraded to a minimum 12-inch diameter. Redevelopments may reduce per-capita sewer demand, as newer, low- or no-flow plumbing fixtures and equipment replaces older, less efficient, installations. These practices may help reduce the overall impact to the wastewater system (City of Seattle, 2015).

Capital Projects. SPU also identifies candidate capital projects which the City implements independent of private development. A list of priority areas for Capital Improvement Projects was identified in the in the 2004 Comprehensive Drainage Plan and the 2006 Wastewater System Master Plan. These lists are updated and refined as additional data is available. Priority is determined based on the impact on public health, safety, and the environment. Capital projects to reduce combined sewer overflows (CSOs) are identified in the 2015 Plan to Protect Seattle's Waterways. Under the SPU Asset Management system, projects must be justified through a business case process that establishes whether a problem or opportunity is timely and important, and whether the proposed solution is superior to alternatives based on a triple bottom line analysis (economic, environmental and social) of life cycle costs and benefits (City of Seattle, 2015). Additionally, the King County Long-term Control Plan (LTCP) identifies ways to reduce CSOs overflow into Seattle's local water bodies. The LTCP identifies which CSOs will be fixed, solutions, cost and construction schedule. The LTCP is required by the Department of Ecology to be updated every five years (King County, 2016).

Seattle Stormwater Code. Current stormwater regulations require new development and redevelopment to mitigate new impervious surfaces and pollution generating surfaces with flow control and/or water quality treatment. City of Seattle stormwater regulations protect people, property and the environment from damage caused by stormwater runoff. The stormwater codes satisfy the City's obligation to comply with their Washington State Municipal Stormwater Permit—National

Pollutant Discharge Elimination System (NPDES) Permit, issued by the Washington State Department of Ecology (City of Seattle, 2015).

The stormwater regulations address how stormwater from development needs to be controlled and/or treated using on-site stormwater management including green stormwater infrastructure (GSI) and other measures. The code also identifies erosion control requirements for construction and grading activities. The erosion control, flow control and treatment requirements help to maintain or mitigate the conditions of the downstream system and discharge location and may reduce the overall impact of development. New development must comply with these regulations, standards and practices and may help reduce the overall impact to the drainage system. Redevelopment that replaces existing impervious surface and provides flow control may reduce runoff rates even below current levels (City of Seattle, 2015). There are areas (single family zoning) in the City where flow control is not required and thus runoff rates can still cause cumulative impacts in downstream systems especially during intense storms. Developers, outside of single family zones, are required to demonstrate that the downstream system has sufficient capacity for changes in stormwater runoff.

Informal drainage generally exists in areas where there are no sidewalks and limited systems of drainage infrastructure to collect stormwater runoff. Areas of Seattle that are primarily served by “informal” drainage systems of ditch and culverts and/or surface drainage frequently experience drainage and flooding issues. In areas of informal drainage the developer may be required to extend the drainage main. The current Right of Way Improvement Manual (ROWIM) also requires some development to install sidewalks with curb and gutter which can affect the drainage patterns (City of Seattle, 2012). Refer to Exhibit 3.8–3 and Figure 3.9–4 in the Seattle 2035 Comprehensive Plan Update EIS (City of Seattle, 2015) for the location of stormwater capacity constrained areas, as well as the extent of informal ditch and culvert drainage. Due to the limitations of areas with informal drainage, these locations are more constrained for development with respect to stormwater infrastructure. In urban villages and centers, sidewalks must be constructed when any number of new housing units are built, with certain exceptions. SPU and SDOT are currently developing options in the ROWIM to allow for low cost sidewalk improvements for small scale developments in areas of informal drainage.

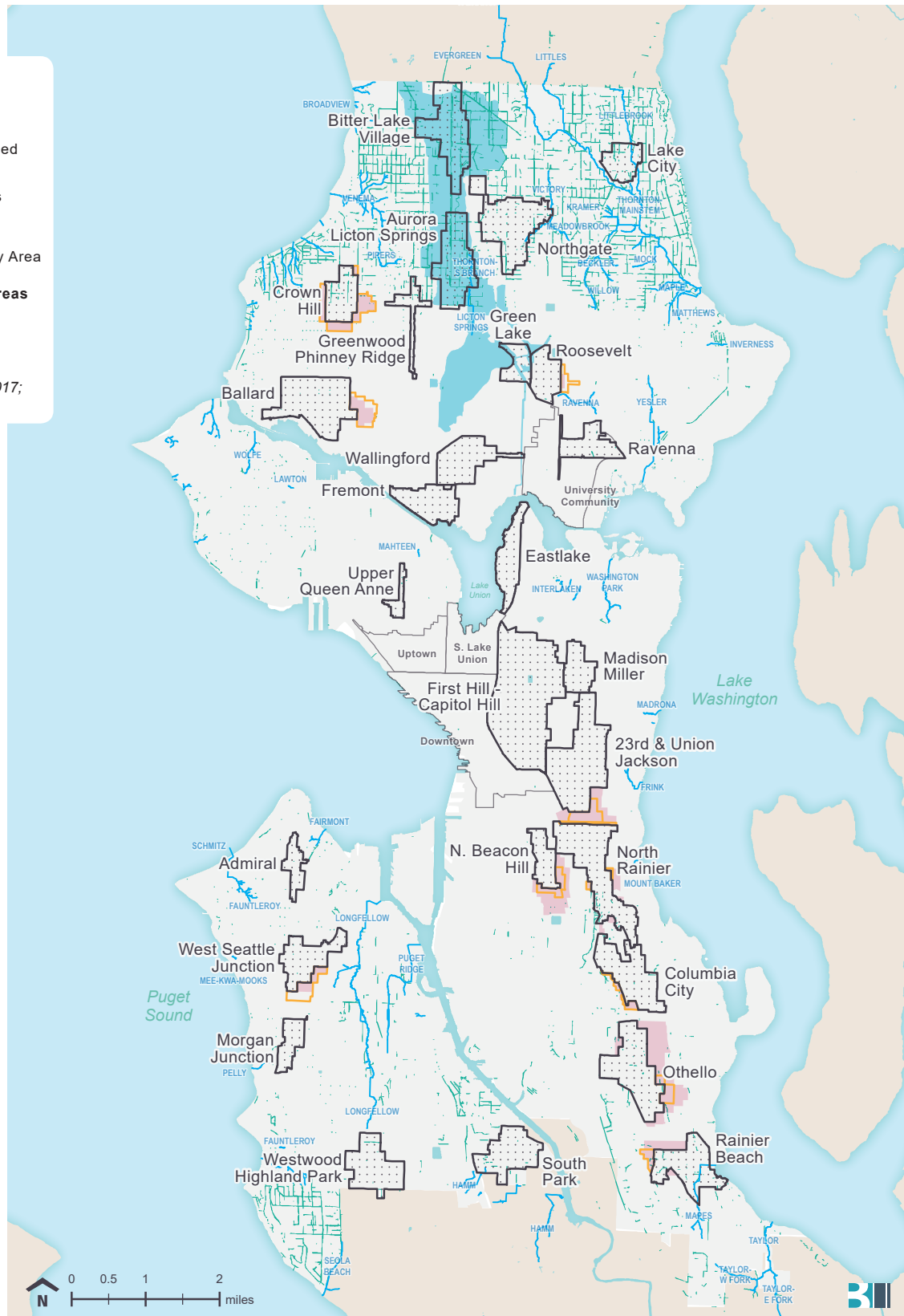
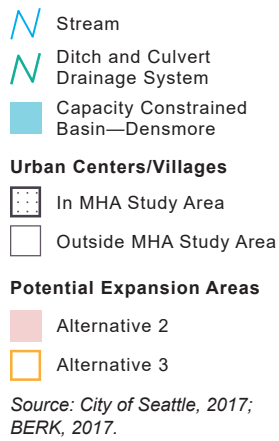


Exhibit 3.8–3 Capacity Constrained Areas

Seattle City Light

Seattle City Light (SCL) has been supplying electricity to Seattle since 1905. SCL supplies hydroelectric power to substations throughout the SCL service area, which conveys power to users (City of Seattle, 2015). Seattle City Light's Six-Year Strategic Business Plan and the state-mandated Integrated Resource Plan are used to insure adequate retail revenue, and necessary physical infrastructure and energy resources to meet the City's demand due to projected economic or population growth (City of Seattle, 2015).

New developments and redevelopments are typically required to comply with the following requirements that ensure available electrical capacity before development occurs.

Energy Benchmarking. The Energy Benchmarking and Reporting Program adopted in 2010 and administered by the City's Office of Sustainability & Environment, requires owners of non-residential and multifamily buildings (20,000 square feet or larger) to track energy performance and annually report to the City of Seattle. This allows building owners to understand and better manage their building's energy usage (City of Seattle, 2015).

Seattle Energy Code. Seattle's commercial and residential energy code sets a baseline for energy efficiency in new construction and substantial alterations (City of Seattle, 2015).

Customer Energy Solutions (CES). The CES division of Seattle City Light delivers several programs and services designed to meet customer energy-related needs. These offerings include energy efficiency, distributed generation (primarily solar), and electric vehicle-related infrastructure services that are available to residential, commercial, and industrial customers. These programs are also available to entities pursuing new construction projects as well as customers pursuing actions within the existing building stock.

3.8.2 IMPACTS

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. See Exhibit 2–7 in Chapter 2 for a detailed description of the MHA EIS residential and commercial growth estimates.

IMPACTS COMMON TO ALL ALTERNATIVES

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 SCL ~~SPU~~ have methods in place that ensure development is not endorsed without identification of demand and availability of utilities, including meeting fire code requirements for new developments and redevelopments. SCL anticipates very small incremental increase in the energy conservation potential due to the proposed action alternatives, and the CES Division anticipates that planned budgets are sufficient to meet any incremental requests for technical assistance or incentives. Some development is required to improve stormwater and drainage systems. However, small scale 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-Liction Springs
- Northgate
- Bitter Lake
- Lake City

Of these villages, Bitter Lake and Aurora-Licton Springs also overlap capacity constrained areas, and all 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 Street with informal drainage.

Public Schools

School Enrollment and Housing Growth

Development of housing could increase demand for schools within the vicinity of the new housing; potentially resulting in either capacity constraints or worsening existing capacity constraints. Considering growth alternatives, estimations of longer term student enrollment stemming from housing growth can inform how school capacity could be affected due to different long-term patterns of growth considered in the MHA proposal.

For the purposes of this analysis, conceptual level net enrollment estimations are made based on the amount of new housing estimated in the school service areas. This analysis focuses on the net new students due to estimated housing growth over the 20-year timeline of the proposed program with a baseline of an existing to a five-year time period. Aside from housing growth a variety of other factors influence demand for schools such as: birth rates, enrollment in private schools, or demographic composition of families in existing housing. These other factors could more substantially effect student enrollment over the 20-year planning horizon.

To arrive at the estimation of net new students from housing growth, historic information on the number of students in different housing unit types, provided by SPS, was used to create a student generation factor from housing units. Estimated housing growth for each alternative is tabulated for the school service area, and broken into three broad categories of housing types in the zoning categories: Residential Small Lot (RSL), Low-rise (LR), and a grouping of other Midrise (MR), High-rise (HR) and Commercial/mixed use zones (C,NC,SM). The amount of housing growth within each of the housing types is estimated based on the proportion of land that can be redeveloped within those zones that are within the school service area under each proposed alternative.

New to the FEIS

Public Schools under Impacts Common to All Alternatives, including Exhibit 3.8–4, Exhibit 3.8–5, and Exhibit 3.8–6, is a new section since issuance of the DEIS

Exhibit 3.8–4 Student Generation Rate by Housing Type

Housing Type Category	Student Generation Rate
Residential Small Lot	17.1%
Low-rise Multifamily	11.9%
Midrise/High-rise Multifamily and Mixed Use Commercial	6.7%

Source: Appendix N; Derived from SPS students in single family homes, apartments, and condos data.

Exhibit 3.8–4 represents the assumed generation rate of enrolled SPS students within the service area that are living in either residential small lot, low-rise multifamily, midrise/high-rise multifamily or mixed use commercial housing types. These rates are based on aggregated data for the attendance area level for all SPS students (K-12).

Student generation factors can be used to estimate net student enrollment for planning purposes; they reflect the rate at which housing unit types produce students that then attend a school within the SPS geographic attendance area, including Highly Capable Cohort (HCC) students and Special Education Students. For example, 17.1 percent of residential small lot housing units in the SPS school district are estimated to produce SPS students; 11.9 percent of low-rise multifamily housing units in the SPS school district are estimated to produce SPS students; and 6.7 percent of midrise/high-rise multifamily and mixed use commercial housing units are estimated to produce SPS students.

School Capacity

The SPS Capital Projects and Planning division calculates capacity by determining the number of available classroom-sized spaces in a building and utilizing information from Enrollment Planning on grade configuration and class size requirements for that particular school. There are two ways of evaluating a school building's capacity, the right size capacity and the operating capacity.

- Right size capacity is the target for a school. Class sizes would meet all requirements, programs such as preschools and daycares would have adequate space, and there would be only periodic need for temporary portable classrooms.
- Operating capacity is the existing capacity as the school is currently configured. This may include reconfigured spaces, multiple portables, and spaces that were previously used by other programs such as a daycare or preschool. (SPS, 2017a).

Exhibit 3.8–5 2017–2018 Estimated Total K-8 Students to Aggregate
Right Size Capacity by School Service Area

School or Service Area	2017/2018 Estimated Total Students	Estimated Aggregate Right Size Capacity	Estimated Existing Capacity (%)
Aki Kurose	3,252	3,885	84%
Denny International	3,953	3,653	108%
Eagle Staff	3,553	3,676	97%
Eckstein	4,166	4,248	98%
Hamilton	3,585	4,294	83%
Jane Addams	3,144	4,271	74%
Madison	4,126	4,221	98%
McClure	3,385	4,214	80%
Meany	2,791	4,306	65%
Mercer International	4,141	4,306	96%
Washington	2,619	4,367	60%
Whitman	2,377	4,254	56%
Total School Service Areas	41,092	49,695	83%

Source: Appendix N.

The estimated aggregate right size capacity of schools for each middle school service area are summarized in Exhibit 3.8–5. The exhibit also displays the total number of K-8 students within the school service area. The estimated existing percent capacity, is an indication of which school service areas are at or near right size capacity under existing conditions.

When capacity is near, at, or exceeding the adopted educational program standards for facility space needs, grade configuration, facility size, class size, educational program offerings, and classroom utilization and scheduling requirements suffer.

The SPS Capital Planning division evaluates the long-range capacity needs of the district in order to plan any needed classroom additions or an increase in capacity as part of a building remodel or replacement. This occurs on a 3- to 6-year cycle with capital levy planning. Capital levies are part of Seattle Public Schools' long-range plan to upgrade and renovate aging school facilities on a planned and predictable timetable (SPS, 2017a).

Enrollment Planning and Projections

The Seattle Public School District makes three types of enrollment projections that are updated on an annual basis:

1. the 10-year resident projection of all students residing and enrolled in the district, but not based on where in SPS they attend;
2. the school projection for October of the upcoming school year; and
3. the school projection for October of the next 5 years.

The five year annual projections are developed for Capital Projects and Planning to prepare for how student enrollment changes could affect the district's building capacity. They do not include service schools, are not used for school budgeting, and they do not take into consideration changes in school program offerings. These projections help to inform decision making, and they may inform future capital facility needs.

The SPS five-year projections include information by individual schools and school service areas. School services areas are named by Middle Schools, and each contains from five to 11 elementary schools that feed into a middle school. The school service areas are used as a geography to review how potential housing and population changes could affect school capacity.

The most recent available five-year projection at the time of this writing is for the 2016–2020 period. The projections are influenced significantly by planned school boundary changes and the opening of new schools, which will affect the enrollment at schools by shifting student populations.

Projected increases in enrollment at local public schools are generally governed by factors such as rate of new development, demographics of families residing in the community and the availability and utilization of private schools. Any time-based projections for increased enrollment can be altered by changes in these or other factors. SPS's school projections for student enrollment are done based on historical information. For SPS enrollment changes at a five-year projection by school attendance, see Appendix N.

For analysis in this FEIS 20-year net students generated from housing growth by school service area is estimated for the No Action and the Preferred Alternative in Exhibit 3.8–6. Student generation rates from Exhibit 3.8–4 are applied to the amount of projected housing growth in the school service areas. The net student increase is the number of additional students expected in each school service area due to the additional housing from the Preferred Alternative over a 20-year period. The school service areas with an asterisk are at over 90 percent of right size capacity in 2017–18 (Exhibit 3.8–5).

Exhibit 3.8–6 Estimated Net Students Generated from Housing Growth by School Service Area—20 Years

School Service Area	No Action	Preferred Alternative	Net Student Increase
Aki Kurose	113	170	57
Denny International*	174	251	77
Eagle Staff*	364	501	136
Eckstein*	284	436	152
Hamilton	341	609	269
Jane Addams	291	381	90
Madison*	302	504	203
McClure	161	225	63
Meany	651	932	281
Mercer International*	221	355	134
Washington	169	252	83
Whitman	326	558	232
Total	3,397	5,174	1,777

*School service areas is over 90 percent of right size capacity in 2017/18.

Source: SPS, 2017.

IMPACTS OF ALTERNATIVE 1 NO ACTION

Alternative 1 is based on the growth strategy of the Seattle 2035 Comprehensive Plan and assumes that MHA would not be implemented in the study area. No area-wide zoning changes or affordable housing requirements would take place. Under Alternative 1, redevelopment, demolition, and new construction projects could occur in the study area under the existing zoning.

Police

As identified in the Existing Conditions subsection above, 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, there would be adequate capacity for future growth. In other precincts, impacts would vary, depending on the distribution of growth under the No Action Alternative. Demand on police services would be identified and managed as growth occurs in the City over time (City of Seattle, 2015).

Fire and Emergency Services

Under the No Action alternative, growth would occur and potentially result in an increase in call volumes. As identified in the Existing Conditions above, existing growth trends in South Lake Union Urban Center (Fire Station 2) and portions of Bitter Lake, Aurora-Licton Springs, Crown Hill and Greenwood-Phinney Ridge urban villages (Fire Station 31), could contribute to increased service call volumes and potential slower average response times in these areas. 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

Under the No Action alternative, growth would continue to occur based on the preferred alternative identified in the Seattle 2035 Comprehensive Plan. For SPS, growth is expected to be most evident in Northwest Seattle, Northeast Seattle, Downtown/Lake Union and Capitol Hill/Central District. The Northwest Seattle, Northeast Seattle and Capitol Hill/Central Districts currently have the capacity to serve potential growth (City of Seattle, 2015).

IMPACTS OF ALTERNATIVE 2

Alternative 2 would revise the existing Land Use Code, resulting in the potential for 63,070 housing units within the EIS study area, an increase of almost 40 percent in housing units from the No Action Alternative of 45,361 housing units. The overall effect would be an additional 17,709 housing units more than would be developed within the planning area under Alternative 1 (see Exhibit 2–7). The additional units would result in an associated population increase of approximately 31,522 residents (based on population generation factor of 1.78 average household sizes in Hub Urban Villages (City of Seattle, 2015). This would be consistent with the Comprehensive Plan’s direction of future growth in identified urban villages, which are typically characterized by higher densities.

Police

The pattern of growth under Alternative 2 would be denser in some areas, resulting in a greater concentration of people within a precinct that the police department would have to serve. As identified, the South Precinct is currently at capacity and serves the urban villages of Columbia City, North Beacon Hill, Othello and Rainier Beach and

the surrounding areas. Alternative 2 would add the potential for 3,959 housing units (1,359 more than under Alternative 1) to these urban villages in the South Precinct. Therefore, implementation of the proposed project under Alternative 2 could result in additional impacts to police services in the South Precinct above those expected under the Seattle 2035 Comprehensive Plan. However, if the planned North Precinct is built, there would be adequate capacity for future growth. In other urban villages, demand on police services would be identified and managed as projects under the MHA are implemented.

Fire and Emergency 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. Similar to the No Action Alternative, growth in portions of Bitter Lake, Aurora-Licton Springs, Crown Hill and Greenwood-Phinney Ridge urban villages (Fire Station 31), could contribute to increased service call volumes and potential slower average response times in these urban villages. Alternative 2 has the potential to add a total of 4,465 housing units (965 more than under Alternative 1) to urban villages that Fire Station 31 serves. Therefore, implementation of the proposed project under Alternative 2 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. In other urban villages, demand on fire and emergency services would be identified and managed as the project is implemented.

Public Schools

Population growth would increase student enrollment in various urban villages throughout the city. Approximately 30 percent of SPS's schools are located in urban villages. Encouraging population growth in urban villages could result in the exceedance of maximum enrollment levels. SPS has calculated enrollment through the 2021/2022 school year, while the MHA is projected through 2035. SPS would respond to the exceedance of capacity as it has done in the past, by adjusting school boundaries and/or geographic zones, adding or 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. Additional projections of net students that could be generated due to MHA implementation is provided in this FEIS for the Preferred Alternative.

The rise in enrollment at public schools in urban villages will impact SPS transportation services. The Northgate, Bitter Lake, Lake City, North Beacon Hill, Othello, Rainier Beach, South Park, Greater Duwamish urban villages 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.

IMPACTS OF ALTERNATIVE 3

Alternative 3 would revise the existing Land Use Code resulting in the potential for 62,858 housing units, an increase of approximately 39 percent in housing units over the No Action Alternative of 45,361 housing units. The overall effect would be an additional 17,497 housing units more than would be developed on the same number of existing parcels (see Exhibit 2–7). The additional units would result in an associated population increase of approximately 31,144 residents, based on population generation factor of 1.78 average household size in Hub Urban Villages (City of Seattle, 2015). This would be consistent with the Comprehensive Plan's direction of future growth in identified urban villages, which are typically characterized by higher densities.

Police

Impacts to police services would be the similar to those identified for Alternative 2. Alternative 3 has the potential to add a total of approximately 3,272 housing units to the urban villages in the South Precinct, which is approximately 687 fewer units in the South Precinct urban villages than in Alternative 2. As a result, impacts related to police services would be slightly less in Alternative 3. However, implementation of Alternative 3 would still likely result in impacts to police services in the at-capacity South Precinct due to a potential increase in demand. In other urban villages, impacts on police services as a result of demand increases would be identified and managed during the project approval process.

Fire and Emergency Services

Impacts to fire and emergency services would be similar to those identified in Alternative 2. Alternative 3 has the potential to add a total of approximately 5,184 housing units to urban villages that Fire Station 31 serves, which is approximately 719 more units in the service area of Fire Station 31 than Alternative 2. As a result, impacts related to fire and emergency service could be slightly more than those of Alternative

2. However, implementation of Alternative 3 would still likely result in impacts to fire and emergency services as a whole due to the potential for increased demand. In other urban villages, impacts on fire and emergency services as a result of demand increases would be identified and managed during the project approval process.

Public Schools

Impacts to public schools would be the same as those identified in Alternative 2. Additional projections of net students that could be generated due to MHA implementation is provided in this FEIS for the Preferred Alternative.

IMPACTS OF THE PREFERRED ALTERNATIVES

The preferred alternative would revise the existing Land Use Code resulting in the potential for 62,376 housing units; the overall effect would be an additional 17,015 housing units more than would be developed on the same number of existing parcels (see Exhibit 2–7). The additional units would result in an associated population increase of approximately 30,287 residents, based on population generation factor of 1.78 average household size in Hub Urban Villages (City of Seattle, 2015). This would be consistent with the Comprehensive Plan's direction of future growth in identified urban villages, and other goals for MHA housing production citywide, which are typically characterized by higher densities.

Police

Impacts to police services would be the similar to those identified for Alternative 3. The Preferred Alternative has the potential to add a total of approximately 3,739 housing units to the urban villages in the South Precinct. Implementation of the Preferred Alternative would still likely result in impacts to police services in the at-capacity South Precinct due to a potential increase in demand. In other urban villages, impacts on police services as a result of demand increases would be identified and managed during the project approval process.

Fire and Emergency Services

Impacts to fire and emergency services would be similar to those identified in Alternative 3. The Preferred Alternative has the potential to add a total of approximately 4,846 housing units to urban villages that Fire Station 31 serves. Implementation of the preferred alternative would

New to the FEIS

Impacts of the Preferred Alternative, including Exhibit 3.8–4, Exhibit 3.8–5, and Exhibit 3.8–6, is a new section since issuance of the DEIS

still likely result in impacts to fire and emergency services as a whole due to the potential for increased demand. In other urban villages, impacts on fire and emergency services as a result of demand increases would be identified and managed during the project approval process.

Public Schools

As shown in Exhibit 3.8–7, the Preferred Alternative is estimated to have a net increase of 1,778 students over the next 20 years, compared to the No Action alternative (Alternative 1). This net increase is 3.6 percent of the aggregate 2017/2018 estimated right size capacity in the school service areas of 49,695 students. Additional facilities would be required if students in existing facilities could not be accommodated. Based on the existing standards, Denny, Eckstein, Eagle Staff, Madison, and Mercer school services areas are above 90 percent of right size capacity and existing capacity constraints could be worsened under the Preferred Alternative, as seen Exhibit 3.8–7 below.

Exhibit 3.8–7 Preferred Alternative: 20-year Growth Estimates and Student Generation Estimate

School Service Area	FEIS Housing Growth	RSL	LR	MR/NC/C	Net Students Compared to No Action*	Estimated % of Right Size Capacity 2017/18**
Aki Kurose	1,872	148	559	1,165	57	84%
Denny International	2,378	445	865	1,068	77	108%
Eagle Staff	7,014	45	505	6,464	136	97%
Eckstein	5,360	7	1,472	3,880	152	98%
Hamilton	6,726	9	3,037	3,680	269	83%
Jane Addams	5,365	2	409	4,954	90	74%
Madison	5,890	60	1,990	3,839	203	98%
McClure	2,493	0	1,106	1,387	63	80%
Meany	11,678	75	2,726	8,877	281	65%
Mercer International	4,019	224	1,197	2,598	134	96%
Washington	3,110	72	697	2,341	83	60%
Whitman	6,483	65	2,251	4,167	232	56%
Total	62,387	1,152	16,814	4,420	1,778	83%

Source: SPS, 2017.

*Based on generation rates in Exhibit 3.8–4 and net from Alternative 1 (No Action).

**Based on Exhibit 3.8–5

Capital Planning evaluates school capacity and space needs annually. If there is enough increased enrollment in a school that additional classroom space is needed, SPS will emphasize use of space in buildings for the primary purpose of K-12 instruction according to these priorities:

1. K-12 Instruction
2. Preschool (because it requires dedicated space and licensing)
3. Before and After Care (because it is more flexible in utilizing multi-use space)
4. Other Youth Activities
5. All other activities

COMPARISON OF THE ALTERNATIVES

Compared to the No Action Alternative, the more compact urban development patterns associated with Alternatives 2, and 3, and the Preferred Alternative would be more efficient to serve and less impactful to police and fire and emergency services, primarily because residents would be located closer to service areas, reducing service time response demands. Additionally, in urban areas where infrastructure is already in place, the extension of public services and utilities is typically less difficult and less costly than in suburban and rural areas where there is less existing infrastructure and greater distances to cover. The concentration of development would likely allow for more efficient use of existing infrastructure associated with public services and utilities.

3.8.3 MITIGATION MEASURES

Measures to address immediate school capacity needs include re-purposing spaces to create classrooms. This may be reconfiguring computer labs or other classroom-sized spaces. This may also cause relocation of preschool or daycare programs. Another option to address capacity needs is to add portable classrooms to the site. The BEX V capacity projects would also help alleviate capacity where needed. Strategies to deal with capacity issues are dependent on the availability of funds, so if levies do not pass, the impacts of the increased growth would be magnified (SPS, 2017a).

MHA implementation is studied over a 20-year time period. Since SPS typically plans for a shorter-term horizon, the district will continue to monitor student generation rates into the future and adjust its facility planning accordingly. The district will continue to implement existing

plans to expand permanent student capacity at area schools. In addition, the district may use portable classrooms or shift attendance boundaries to address student capacity issues that arise on a shorter-term basis.

In coordination with the Department of Education and Early Learning and in partnership with the Seattle Public Schools, the City's Office of Planning and Community Development will develop planning strategies that support the District's public school facility needs for anticipated student population consistent with adopted comprehensive plan policies and growth forecasts. The City of Seattle and SPS are engaged in coordination efforts to identify opportunities and sites for new school facilities. Ongoing efforts include exploration of sites for possible downtown elementary and high schools.

Increased collaboration between the School District and City of Seattle over the 20-year time period will mitigate school capacity constraints. 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 particularly in areas of known school capacity constraints. The City and SPS could investigate ways to strengthen integrated long-term planning efforts, which could include creation of new plans that are jointly approved by City and School District governing bodies. This could be achieved within the context of the City's Comprehensive Plan and/or future community plans, or in other ways. As additional mitigation of school capacity constraints, the City could study and develop a recommendation for a schools impact fee on new development to support the funding of public school facilities. However, decision-makers would need to evaluate such an impact fee in conjunction with potential impact fees for other services, including parks, and transportation.

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.

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.

3.8.4 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

No significant unavoidable impacts to public services or utilities are anticipated at this time for any of the proposed alternatives. 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.

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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.

3.9



AIR QUALITY AND GREENHOUSE GAS EMISSIONS.

This chapter analyzes potential impacts to air quality and climate change in the study area.

The alternatives considered in this EIS may contribute to regional air quality impacts. The analysis focuses on the following pollutants of concern: carbon monoxide (CO), particulate matter (PM), ozone precursors (nitrogen dioxide and volatile organic compounds), and toxic air pollutants (TAPs). TAPs and fine particulate matter (PM_{2.5}) are analyzed to the degree feasible to identify potential public health impacts from locating new sensitive receptors within transportation corridors.

This chapter also analyzes how the alternatives may contribute to global climate change through greenhouse gas emissions related to transportation and land uses. Transportation systems contribute to climate change primarily through the emissions of certain greenhouse gases (CO₂, CH₄, and N₂O) from nonrenewable energy (primarily gasoline and diesel fuels) used to operate passenger, commercial, and transit vehicles. Land use changes contribute to climate change through construction, operational use of electricity and natural gas, water demand, and waste production.

3.9.1 AFFECTED ENVIRONMENT

AIR QUALITY

Regulatory Agencies and Requirements

Federal, state, and local agencies regulate air quality in the Puget Sound region: the U.S. EPA, the Washington State Department of Ecology (Ecology), and the Puget Sound Clean Air Agency (PSCAA). Each has its own role in regulating air quality. The City of Seattle codifies air quality policies in SMC

25.05.675.A that provide limited regulatory authority over actions that could degrade air quality.

U.S. Environmental Protection Agency

The 1970 Clean Air Act (last amended in 1990) requires that regional planning and air pollution control agencies prepare a regional air quality plan to outline how stationary and mobile sources of pollutants will be controlled to achieve all standards by the deadlines specified in the Act. Intended to protect the public health and welfare, these ambient air quality standards ~~are~~ specify the concentration of pollutants (with an adequate margin of safety) to which the public can be exposed without adverse health effects. The standards are designed to protect the people most susceptible to respiratory distress, including asthmatics, the very young, the elderly, people weak from other illness or disease, and people engaged in strenuous work or exercise.

As required by the 1970 Clean Air Act, EPA initially identified six criteria air pollutants found in urban environments for which state and federal health-based ambient air quality standards have been established. EPA calls these criteria air pollutants because it has regulated them by developing specific public health- and welfare-based criteria as the basis for setting permissible levels. EPA originally identified ozone, CO, PM, nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead as the six criteria air pollutants. Since then, EPA has identified and set permissible levels for subsets of PM. These include PM₁₀ (matter less than or equal to 10 microns in diameter) and PM_{2.5} (matter less than or equal to 2.5 microns in diameter).

The Clean Air Act established National Ambient Air Quality Standards (NAAQS), with primary and secondary standards, to protect the public health and welfare from air pollution. Areas of the U.S. that do not meet the NAAQS for any pollutant are designated by EPA as nonattainment areas. Areas once designated nonattainment but now achieving the NAAQS are termed maintenance areas. Areas with air pollution levels below the NAAQS are termed attainment areas. In nonattainment areas, states must develop plans to reduce emissions and bring the area back into attainment of the NAAQS.

Exhibit 3.9–1 displays the primary and secondary NAAQS for the six criteria pollutants. Ecology and PSCAA have authority to adopt more stringent standards, though many state and local standards are equivalent to the federal mandate.

Exhibit 3.9–1 Federal and State Ambient Air Quality Standards
FEDERAL NAAQS¹

Pollutant	Averaging Time	Primary Standard	Secondary Standard	Washington State Standard
Ozone	1 hour	NAS ²	NAS	0.12 ppm
	8 hour	0.070 ppm	0.070 ppm	NAS
Carbon Monoxide (CO)	1 hour	35 ppm	NAS	35 ppm
	8 hour	9 ppm	NAS	9 ppm
Nitrogen Dioxide (NO₂)	1 hour	0.100 ppm	NAS	0.100 ppm
	Annual	0.053 ppm	0.053 ppm	0.05 ppm
Sulfur Dioxide (SO₂)	1 hour	0.075 ppm	0.5 ppm (3-hour)	0.40 ppm
	24 hour	0.14 ppm	NAS	0.10 ppm
	Annual	0.03 ppm	NAS	0.02 ppm
Particulate Matter (PM₁₀)	24 hour	150 µg/m ³	150 µg/m ³	150 µg/m ³
	Annual	NAS	NAS	50 µg/m ³
Fine Particulate Matter (PM_{2.5})	24 hour	35 µg/m ³	35 µg/m ³	NAS
	Annual	12 µg/m ³	15 µg/m ³	NAS
Lead	Rolling 3-month average	0.15 µg/m ³	0.15 µg/m ³	NAS

NAAQS = National Ambient Air Quality Standards

NAS = no applicable standard

ppm = parts per million

µg/m³ = micrograms per cubic meter

¹ NAAQS, other than ozone and particulates, and those based on annual averages or annual arithmetic means, are not to be exceeded more than once a year. The eight-hour ozone standard is attained when the three-year average of the fourth highest daily concentration is 0.08 ppm or less. The 24-hour PM₁₀ standard is attained when the three-year average of the 99th percentile of monitored concentrations is less than the standard. The 24 hour PM_{2.5} standard is attained when the three-year average of the 98th percentile is less than the standard.

² EPA revoked the national one-hour ozone standard on June 15, 2005. The 8-hour ozone standard was approved in April 2005 and became effective in May 2006.

Source: ESA, 2017.

An area remains a nonattainment area for that particular pollutant until concentrations comply with the NAAQS. Only after measured concentrations have fallen below the NAAQS can the state apply for redesignation to attainment, and it must then submit a 10-year plan for continuing to meet and maintain air quality standards that follow the Clean Air Act. During this 10-year period, the area is designated a maintenance area. The Puget Sound region is currently classified as a maintenance area for CO. With regard to ozone, however, EPA revoked its one-hour ozone standard, and the area currently meets the one-hour standard; therefore, the maintenance designation for ozone no longer applies in the Puget Sound region. EPA designated the Seattle Duwamish area as a maintenance area for PM₁₀ in 2000 and in 2002.

Washington State Department of Ecology

Ecology maintains an air quality program to safeguard public health and the environment by preventing and reducing air pollution. Washington's main sources of air pollution are motor vehicles, outdoor burning, and wood smoke. Ecology strives to improve air quality throughout the state by overseeing the development of and conformity with the State Implementation Plan (SIP), the state's plan for meeting and maintaining the NAAQS. Ecology has maintained its own air quality standard for one-hour ozone concentrations and established its own more stringent air quality standards for one-hour ozone, one-hour and 24-hour SO₂, and annual NO₂, SO₂ and PM₁₀ concentrations, as shown in Exhibit 3.9–1.

Puget Sound Clean Air Agency

The PSCAA has local authority for setting regulations and permitting of stationary air pollutant sources and construction emissions. PSCAA also maintains and operates a network of ambient air quality monitoring stations throughout its jurisdiction.

Existing Climate and Air Quality

The City of Seattle is in the Puget Sound lowland. Buffered by the Olympic and Cascade mountain ranges and Puget Sound, the Puget Sound lowland has a relatively mild, marine climate with cool summers and mild, wet, and cloudy winters.

The prevailing wind direction in the summer is from the north or northwest. The average wind velocity is less than 10 miles per hour. Persistent high-pressure cells often dominate summer weather and create stagnant air conditions. This weather pattern sometimes contributes to the formation of photochemical smog. During the wet winter season, the prevailing wind direction is south or southwest.

There is sufficient wind most of the year to disperse air pollutants released into the atmosphere. Air pollution is usually most noticeable in the late fall and winter, under conditions of clear skies, light wind, and a sharp temperature inversion. Temperature inversions occur when cold air is trapped under warm air, thereby preventing vertical mixing in the atmosphere. These can last several days. If poor dispersion persists for more than 24 hours, the PSCAA can declare an "air pollution episode" or local "impaired air quality."

Pollutants of Concern and Trends

Pollutants generated by both natural and manmade sources affect air quality. In general, the largest manmade contributors to air emissions are transportation vehicles and power-generating equipment, both of which typically burn fossil fuels. The main criteria pollutants of interest for land use development are CO, PM, ozone, and ozone precursors (volatile organic compounds (VOCs) and oxides of nitrogen (NO_x)). Both federal and state standards regulate these pollutants, along with two other criteria pollutants, SO_2 and lead. The Puget Sound region is in attainment for ozone, NO_2 , lead, and SO_2 .

The major sources of lead emissions have historically been mobile and industrial sources. Due to the phase-out of leaded gasoline, metal processing is currently the primary source of lead emissions, and no lead emissions are associated with development under the alternatives in this EIS. SO_2 is produced by the combustion of sulfur-containing fuels, such as oil, coal, and diesel. Historically, Washington has measured very low levels of SO_2 . Because the levels were so low, most monitoring was stopped. SO_2 emissions have dropped over the past 20 years because control measures were added for some sources, some larger SO_2 sources shut down, and the sulfur content of gasoline and diesel fuel was reduced nearly 90 percent. SO_2 emissions would not be appreciably generated by development under any alternative and, given the attainment status of the region, are not further considered in this analysis.

The largest contributors of pollution related to land development activity are construction equipment, motor vehicles, and off-road construction equipment. The main pollutants emitted from these sources are CO, PM, ozone precursors (VOC and NO_x), GHGs and TAPs. Motor vehicles and diesel-powered construction equipment also emit pollutants that contribute to the formation of ground-level ozone. This section discusses the main pollutants of concern and their impact on public health and the environment.

Carbon Monoxide

CO is an odorless, colorless gas usually formed as the result of the incomplete combustion of fuels. The largest sources of CO are motor vehicle engines and traffic, and industrial activity and woodstoves. Exposure to high concentrations of CO reduces the oxygen-carrying capacity of the blood and can cause headaches, nausea, dizziness, and fatigue; impair central nervous system function; and induce angina (chest

pain) in persons with serious heart disease. Very high levels of CO can be fatal. Puget Sound region is designated as a maintenance area for CO (Ecology 2017).

Particulate Matter

PM is a class of air pollutants that consists of heterogeneous solid and liquid airborne particles from manmade and natural sources. PM is measured in two size ranges: PM_{10} and $PM_{2.5}$. Fine particles are emitted directly from a variety of sources, including wood burning (both outside and indoor wood stoves and fireplaces), vehicles, and industry. They also form when gases from some of these same sources react in the atmosphere.

Exposure to particle pollution is linked to various significant health problems, such as increased hospital admissions and emergency department visits for cardiovascular and respiratory problems, non-fatal heart attacks, and premature death. People most at risk from fine and coarse particle pollution exposure include people with heart or lung disease (including asthma), older adults, and children. Pregnant women, newborns, and people with certain health conditions, such as obesity or diabetes, may also be more susceptible to PM-related effects.

The federal annual $PM_{2.5}$ standard has not been exceeded in the Puget Sound area since EPA established its NAAQS in 2007. The federal daily $PM_{2.5}$ standard has not been exceeded in the Puget Sound area since the initiation of monitoring for this pollutant in 2001 (PSCAA 2015). In 2012, EPA strengthened the annual standard from 15 micrograms per cubic meter to 12 micrograms per cubic meter. The Puget Sound area is in attainment with the revised $PM_{2.5}$ standard. Notwithstanding the continued attainment of federal PM_{10} standards, portions of the Puget Sound region continue to be designated as maintenance areas for PM_{10} .

Ozone

Ozone is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving VOCs (which regulating agencies sometimes call reactive organic gases or ROGs) and NO_x . The main sources of VOC and NO_x , often called ozone precursors, are combustion processes (including motor vehicle engines) and the evaporation of solvents, paints, and fuels. Ozone levels are usually highest in the afternoon because of the intense sunlight and the time required for ozone to form in the atmosphere. Ecology currently monitors ozone from May through September, the period of concern for elevated

ozone levels in the Pacific Northwest. No violations of the NAAQS for ozone have occurred at the Seattle monitoring station since monitoring commenced there in 1999.

Elevated concentrations of ground-level ozone can impair lung function, cause respiratory irritation, and aggravate asthma. Ozone has also been linked to immune system impairment. People with respiratory conditions should limit outdoor exertion during elevated ozone levels. Even healthy individuals may experience respiratory symptoms on a high-ozone day. Ground-level ozone can also damage forests and agricultural crops, interfering with their ability to grow and produce food. The Puget Sound region is designated as an attainment area for the federal ozone standard.

Toxic Air Pollutants

Other pollutants known to cause cancer or other serious health effects are called air toxics. Ecology began monitoring air toxics at the Seattle Beacon Hill site in 2000. The Clean Air Act identifies 188 air toxics; EPA later identified 21 of these air toxics as mobile source air toxics (MSATs) and then extracted a subset of nine priority MSATs: benzene, ethylbenzene, formaldehyde, acetaldehyde, diesel particulate matter/ diesel exhaust organic gases, acrolein, naphthalene, polycyclic organic matter, and 1,3-butadiene. Exposure to these pollutants for long durations and sufficient concentrations increases the chances of cancer; damage to the immune system; and neurological, reproductive, developmental, respiratory, and other serious health problems.

Diesel particulate matter poses the greatest potential cancer risk (70 percent of the total risk from air toxics) in the Puget Sound area (PSCAA 2011). This pollution comes from diesel-fueled trucks, cars, buses, construction equipment, and rail, marine, and port activities. Particulate matter from wood smoke (a result of burning in woodstoves and fireplaces or outdoor fires) presents the second-highest potential cancer health risk. Wood smoke and auto exhaust also contain formaldehyde, chromium, benzene, 1,3-butadiene, and acrolein. Chromium is also emitted from industrial plating processes. EPA prioritizes reductions of these air toxics.

Air Quality Information Sources, Monitoring, and Trends

The PSCAA monitors criteria air pollutant concentrations at ~~three~~ two locations within Seattle city limits. The primary monitoring station in Seattle is in Beacon Hill. This station collects data for ozone, ~~CO~~, ~~NO₂~~, PM_{2.5}, and SO₂. The other locations ~~are~~ is 10th Ave S and S Weller St

~~and Duwamish. The 10th and Weller station monitors concentrations of CO and, NO₂, and PM_{2.5}. The Duwamish station monitors concentrations of PM_{2.5}.~~

Exhibit 3.9–2 displays the most recent three years of available monitoring data at these locations and shows that the air pollutant concentration trends for these pollutants remain below the NAAQS.

Emission projections and ongoing monitoring throughout the central Puget Sound region indicate that the ambient air pollution concentrations for CO and PM_{2.5} have decreased over the past decade. Measured ozone concentrations, in contrast, have remained relatively static. The decline of CO is primarily due to improvements to emission controls on motor vehicles and the retirement of older, higher-polluting vehicles. However, the Puget Sound Regional Council estimates that by 2040 the Puget Sound region population will grow by one million people, a 27 percent increase from 2013, to reach a population of 4.9 million people (PSRC 2015). The highest population increase is estimated to be in King County. These estimates indicate that CO, PM_{2.5}, and ozone emissions will increase, which could lead to future NAAQS violations.

Air toxic pollutant emissions are also of concern because of the projected growth in vehicle miles traveled. EPA has been able to reduce benzene, toluene, and other air toxics emissions from mobile sources through stringent standards on tailpipe emissions and by requiring the use of reformulated gasoline. The FHWA estimates that even if VMT increases by 45 percent from 2010 to 2050, a combined reduction of 91 percent in the total annual emissions for the priority MSAT is projected for the same time period (FHWA 2016).

Exhibit 3.9–2 Ambient Air Quality Monitoring Data for Monitoring Stations in Seattle

MAXIMUM CONCENTRATIONS

Pollutant	Station	Averaging Time	2014	2015	2016	NAAQS Standard
Ozone	Beacon Hill	1 hour	0.04458 ppm	0.04562 ppm	0.0460 ppm	0.070 ppm
		8-hour	0.048 ppm	0.050 ppm	0.050 ppm	NAS
Carbon Monoxide (CO)	10th & Weller	1 hour	2.73-309 ppm	2.216 ppm	N/A1-999 ppm	35 ppm
		8 hour	2.0 ppm	1.8 ppm	N/A1-6 ppm	9 ppm
	Beacon Hill	1-hour	1.078 ppm	1.1 ppm	1.198 ppm	35 ppm
		8-hour	1.0 ppm	0.9 ppm	0.9 ppm	9 ppm
Particulate Matter (PM₁₀)	Beacon Hill	24-hour	24 µg/m ³	38 µg/m ³	24 µg/m ³	150 µg/m ³
		Annual	9.76 µg/m ³	10.94 µg/m ³	9.24 µg/m ³	NAS
Fine Particulate Matter (PM_{2.5})	Beacon Hill 10th & Weller	24-hour	14.633-6 µg/m ³	20.826-5 µg/m ³	11.820-6 µg/m ³	35 µg/m ³
		Annual	5.79-96 µg/m ³	6.29-29 µg/m ³	5.47-74 µg/m ³	12 µg/m ³
	Beacon Hill	24-hour	27.1 µg/m ³	33.1 µg/m ³	16.2 µg/m ³	35 µg/m ³
		Annual	5.88 µg/m ³	6.55 µg/m ³	5.46 µg/m ³	12 µg/m ³
	Duwamish	24-hour	44.0 µg/m ³	31.7 µg/m ³	30.2 µg/m ³	35 µg/m ³
		Annual	8.14 µg/m ³	9.77 µg/m ³	6.53 µg/m ³	12 µg/m ³
Nitrogen Dioxide (NO₂)	10th & Weller	1 hour	0.091 ppm	0.106 ppm	0.071 ppm	0.1 ppm
		Annual	N/A0-024 ppm	N/A0-024 ppm	0.036 ppm	0.05 ppm
	Beacon Hill	1-hour	0-060 ppm	0-055 ppm	0-058 ppm	0-1 ppm
		Annual	0-012 ppm	0-011 ppm	0-025 ppm	0-05 ppm
Sulfur Dioxide (SO₂)	Beacon Hill	1 hour	N/A0-003 ppm	0.009 ppm	N/A0-008 ppm	0.075 ppm
		24-hour	N/A0-001 ppm	N/A0-003 ppm	N/A0-002 ppm	0.14 ppm
		Annual	N/A0-001 ppm	N/A0-002 ppm	N/A0-001 ppm	0.03 ppm

NAAQS = National Ambient Air Quality Standards

NAS = no applicable standard

N/A = incomplete data/not available

ppm = parts per million

µg/m³ = micrograms per cubic meter

Source: ESA, 2017.

Sources of Air Pollution

Air pollution sources in Seattle and its environs can be categorized into point sources, transportation sources, and area sources.

Transportation sources include freeways, highways, and major arterial roadways, particularly those supporting a high percentage of diesel truck traffic, such as State Routes 99 and 599. A Washington State Department of Health (DOH) health risk assessment found that on-road mobile sources contribute to the highest cancer and non-cancer risks near major roadways over a large area of south Seattle and that risks and hazards are greatest near major highways and drop dramatically about 200 meters (656 feet) from the center of highways (WSDH 2008).

The DOH analysis focuses on the south Seattle/Duwamish Valley area. Georgetown and South Park residents asked DOH to assess pollutant impacts on their health. To date this is the only such assessment for the greater Seattle area. Most land use in the Duwamish Valley is commercial or industrial except for the two residential communities of Georgetown and South Park. The study's findings, particularly related to exposure from highway sources, is likely to be similar for north Seattle.

EPA identifies risk above 100 per one million persons (100 excess cancer risk) as a criterion for conducting air toxic analyses and making risk management decisions at the facility and community-scale level and, consequently, may be interpreted as a relatively high cancer risk value from a single air pollutant source (BAAQMD 2009). Other states have identified recommended separation distances of residential uses from rail yard sources of 1,000 feet. This 1,000-foot distance correlates to increased cancer risks below 500 in one million. Sensitive land uses inside this area are considered inappropriate and could represent a moderate to severe air quality impact (CARB 2005). These mapped areas represent an increased cancer risk. Cancer estimates are expressed in scientific notation, for example $1e-6$ or 1×10^{-6} . This means one excess cancer per million individuals exposed, or an individual's probability of getting cancer from exposure to air pollutants is one in 1,000,000. These risks should not be interpreted as estimates of disease in the community but only as a tool to define potential risk.

Additional transportation sources include railway lines supporting diesel locomotive operations. BNSF Railway Company (BNSF) owns and operates a mainline dual-track from Portland to Seattle. Union Pacific owns and operates a single mainline track with two-way train operations between Tacoma and Seattle. BNSF owns and operates tracks that

extend north from downtown Seattle to Snohomish County and then east to Spokane. A connecting spur, operated by the Ballard Terminal Rail Company, serves the Ballard and the western ship canal area. Other transportation sources that contribute to regional and localized pollutant concentrations include aircraft (from Boeing Field) and marine sources (ferries, tugs, container ships, etc.).

Point sources (also called stationary sources) are generally industrial equipment and are almost always required to have a permit to operate from PSCAA. Examples include industrial turbines and cement manufacturing plants. Area sources include ports, truck-to train intermodal terminals, and distribution centers.

The Port of Seattle aims to reduce PM emissions from ships by 70 percent while they are in port and from land-based equipment by 30 percent (Port of Seattle et al. 2007). Measures to reduce emissions include providing power plug-ins to ships while they are in port.

Sensitive Populations

People more sensitive to the health effects of air pollutants include the elderly and the young; populations with higher rates of respiratory disease, such as asthma and chronic obstructive pulmonary disease; and people with other environmental or occupational health exposures (e.g., indoor air quality) that affect cardiovascular or respiratory diseases. Therefore, land uses and facilities such as schools, children's daycare centers, hospitals, and nursing and convalescent homes are considered more sensitive than the general public to poor air quality because the people associated with these uses are more susceptible to respiratory distress.

Parks and playgrounds are considered moderately sensitive to poor air quality because people engaged in strenuous work or exercise have increased sensitivity to poor air quality. However, exposure times are generally shorter in parks and playgrounds than in residential locations and schools. Residential areas are considered more sensitive to air quality conditions compared to commercial and industrial areas because people generally spend more time at home and thus have proportionally greater exposure to ambient air quality conditions. Workers are not considered sensitive receptors because all employers must follow regulations set forth by the Occupational Safety and Health Administration (OSHA) to ensure the health and well-being of their employees with regard to their own operations.

GREENHOUSE GASES AND CLIMATE CHANGE

Gases that trap heat in the atmosphere are referred to as greenhouse gases because, like a greenhouse, they capture heat radiated from the earth. The accumulation of GHGs are a driving force in global climate change. Definitions of climate change vary between and across regulatory authorities and the scientific community. In general, however, climate change can be described as the changing of the earth's climate due to natural fluctuations and anthropogenic activities (i.e., activities relating to, or resulting from the influence of, human beings) that alter the composition of the global atmosphere.

Increases in GHG concentrations in the earth's atmosphere are believed to be the main cause of human-induced climate change. GHGs naturally trap heat by impeding the exit of solar radiation that hits the earth and reflects into space. This trapping of heat is called a "greenhouse effect." Some GHGs occur naturally and are necessary for keeping the earth's surface habitable. But increases in their atmospheric concentrations during the last 100 years have decreased the amount of solar radiation reflected back into space, intensifying the natural greenhouse effect and increasing global average temperature.

Pollutants of Concern

The principal GHGs of concern are CO₂, CH₄, N₂O, SF₆, perfluorocarbons (PFCs) and hydrofluorocarbons (HFCs). Electric utilities, including Seattle City Light, use SF₆ in electric distribution equipment. Each principal GHG has a long atmospheric lifetime (one year to several thousand years). In addition, the potential heat-trapping ability of each of these gases varies substantially. CH₄ is 23 times as potent as CO₂ at trapping heat, while SF₆ is 23,900 times more potent than CO₂. Conventionally, GHGs have been reported as CO₂ equivalents (CO₂e). CO₂e reflects the relative potency of non-CO₂ GHGs and converts their quantities to an equivalent amount of CO₂ so that all emissions can be reported as a single quantity.

The primary human-made processes that release GHGs include combustion of fossil fuels for transportation, heating, and electricity generation; agricultural practices that release CH₄, such as livestock production and crop residue decomposition; and industrial processes that release smaller amounts of high global warming potential gases like SF₆, PFCs and HFCs. Deforestation and land cover conversion also

contribute to global warming by reducing the earth's capacity to remove CO₂ from the air and altering the earth's albedo (surface reflectance), thereby allowing more solar radiation to be absorbed.

Regulatory Rules and Plans

Washington State Department of Ecology

In December 2010, Ecology adopted Chapter 173-441 Washington Administrative Code—Reporting of Emissions of Greenhouse Gases. This rule institutes mandatory GHG reporting for:

- Facilities that emit at least 10,000 metric tons of GHGs per year in Washington; and
- Suppliers of liquid motor vehicle fuel, special fuel, or aircraft fuel that supply products equivalent to at least 10,000 metric tons of CO₂ per year in Washington.

In 2016, Ecology established GHG emission standards for certain large emitters. Chapter 173.442 WAC establishes emission standards for GHG emissions from certain stationary sources located in Washington, including natural gas distributors, petroleum product producers (i.e., refineries and importers), power plants, waste facilities, and metal, cement, pulp and paper, and glass manufacturers.

Seattle Climate Action Plan

Seattle was the first city in the nation to adopt a green building goal for all new municipal facilities. In 2001, the City created a Leadership in Energy and Environmental Design (LEED) incentive program for private development projects. Resolution 30144 established Seattle City Light's long-term goal of meeting all of Seattle's electrical needs with zero net GHG emissions. Seattle City Light achieved GHG neutrality in 2005 by reducing emissions, inventorying remaining emissions, and purchasing offsets for remaining emissions and has maintained GHG neutrality since (SCL 2012).

In 2011, the City Council adopted Resolution 31312 establishing a long-term climate protection vision for Seattle that included achieving net zero GHG Emissions by 2050 and preparing for the likely impacts of climate change. The City prepared a Climate Action Plan (2013 CAP) that details the strategy for achieving these goals. The strategy focuses on City actions that reduce GHG emissions while also supporting other

community goals, including building vibrant neighborhoods, fostering economic prosperity, and enhancing social equity. The 2013 CAP focuses on sources of emissions where City action and local community action will have the greatest impact: road transportation, building energy, and waste, which together account for most local emissions. The 2013 CAP identifies the Comprehensive Plan as one of many plans that will implement the Climate Action Plan. With 2008 as the baseline year, the 2013 CAP identifies the following targets by 2030:

- 20 percent reduction in vehicle miles traveled
- 75 percent reduction in GHG emissions per mile for Seattle vehicles
- 10 percent reduction in commercial building energy use
- 20 percent reduction in residential building energy use
- 25 percent reduction in combined commercial and residential building energy use

The 2013 CAP also calls for identifying equitable development policies to support growth and development near existing and planned high-capacity transit without displacement.

Existing Greenhouse Gas Emissions and Trends

In August 2016, the City published its 2014 Seattle Community Greenhouse Gas Emissions Inventory. Primary sources (core emissions) of GHG emissions include on-road transportation, building energy, and waste generation. Transportation sources comprise about 66 percent of inventoried emissions, building energy (electricity generation and natural gas and other fuel combustion) 32 percent, and waste sources three percent. From 2008 to 2014, core emissions of GHGs declined five percent from 3.6 million to 3.4 million metric tons of CO₂e. This reduction occurred despite an overall increase in population of 13 percent during the same period (City of Seattle 2016).

Ecology estimates that in 2013, Washington produced about 94.4 million gross metric tons of CO₂e (MMTCO₂e, or about 104 million U.S. tons) (Ecology 2016). Ecology found that transportation is the largest source, at 42.8 percent of the state's GHG emissions, followed by electricity generation (both in-state and out-of-state) at 19 percent, and residential, commercial, and industrial energy use at 22 percent. The sources of the remaining 16.2 percent of emissions are agriculture, waste management, and industrial processes.

Transportation Related Greenhouse Gas Emissions

The analysis completed for this EIS builds on the findings in the 2014 Seattle Community Greenhouse Gas Emissions Inventory. This analysis calculates transportation GHG emissions at the citywide level. The Seattle inventory estimates 2,283,000 metric tons of CO₂e (MTCO₂e) in 2014.

Based on a review of traffic and fuel economy trends, the 2014 GHG emissions estimate is assumed to adequately represent current conditions and may be conservatively high. Appendix L has additional details.

3.9.2 IMPACTS

IMPACTS COMMON TO ALL ALTERNATIVES

Air Quality

Construction-Related Emissions

Future growth under any alternative would result in development. Most development projects in the city would entail demolition and removal of existing structures or parking lots, excavation and site preparation, and construction of new buildings. Emissions generated during construction activities would include exhaust emissions from heavy duty construction equipment, trucks used to haul construction materials to and from sites, worker vehicle emissions, and fugitive dust emissions associated with earth-disturbing activities and other demolition and construction work.

Fugitive dust emissions are typically generated during construction phases. Activities that generate dust include building and parking lot demolition, excavation, and equipment movement across unpaved construction sites. The PSCAA requires dust control measures (emissions control) for construction projects through Article 9, Section 9.15. Measures applicable to fugitive dust include (1) using control equipment, enclosures, or wet suppression techniques, (2) paving or otherwise covering unpaved surfaces as soon as possible, (3) treating construction sites with water or chemical stabilizers, reducing vehicle speeds and cleaning vehicle undercarriages before entering public roadways, and (4) covering or wetting truck loads or providing freeboard in truck loads. Given these requirements, impacts related to construction dust are concluded to be less than significant.

During construction activities, diesel-powered demolition and construction equipment would emit criteria air pollutants. Other emissions during construction would result from trucks used to haul construction materials to and from sites and from vehicle emissions generated during worker travel to and from construction sites. Exhaust emissions from diesel off-road equipment represent a relatively small percentage of the overall emission inventory in King County: 0.6 percent of countywide CO, 8.8 percent of countywide NO_x, 6.7 percent of countywide PM_{2.5} and 0.9 percent of countywide VOC (PSCAA 2008). Consequently, the primary emissions of concern (greater than one percent contribution) from construction equipment are NO_x and PM_{2.5} (the latter a priority air toxic). NO_x is primarily an air quality concern with respect to its role in (regional) ozone formation, and the Puget Sound air shed has long been designated as an attainment area (meeting standards) with respect to ozone. Construction-related NO_x emissions are not expected to generate significant adverse air quality impacts nor lead to violation of standards under any of the alternatives. The same conclusion is reached for diesel-related emissions of PM_{2.5}, which could generate temporary localized adverse impacts within a few hundred feet of construction sites.

Federal regulations require cleaner off-road equipment. Specifically, EPA has set emissions standards for new off-road equipment engines, classified as Tier 1 through Tier 4. Tier 1 emission standards were phased in between 1996 and 2000, and Tier 4 interim and final emission standards for all new engines were phased in between 2008 and 2015. To meet Tier 4 emission standards, engine manufacturers must provide new engines with advanced emission-control technologies. Although the full benefit of these regulations will not be realized for several years, EPA estimates that by implementing the federal Tier 4 standards, NO_x and PM emissions will be reduced by more than 90 percent (U.S. EPA 2004). Consequently, it is anticipated that, as the region-wide construction fleet converts to newer equipment, the potential for health risks from off-road diesel equipment will be substantially reduced. Given the transient nature of construction-related emissions and regulatory improvements scheduled to be phased in, construction related emissions associated with all three alternatives would be considered only a minor adverse air quality impact.

Land Use Compatibility and Public Health Considerations

Future growth could result in more people living near to mobile and stationary sources of air toxics and particulate matter PM_{2.5}. The impact

of the action alternatives is that they would increase the potential number of people, or other “sensitive receptors” like hospitals, schools, daycare facilities, or senior house, located near existing sources of harmful air pollutants.

As discussed under Sources of Air Pollution (above), portions of Seattle located along major roadways (freeways and the most-traveled highways) are exposed to relatively high cancer risk values. Modeling indicates increased cancer risks in existing residential areas (WSDH 2008) ~~of up to 800 in one million~~. These risks are not estimates of disease in the community but a tool to define potential risk. A risk above 100 per one million persons (100 excess cancer risk) is a criterion identified by EPA guidance for conducting air toxic analyses and making risk management decisions at the facility and community-scale level. Residential parcels are located near such highway traffic corridors in south Seattle (although often above Interstate 5 on Beacon Hill and in some areas buffered by greenbelts), and thus at least some parcels are located in areas of higher exposure and risk. Risks and hazards drop dramatically in areas more than 200 meters (656 feet) from the center of highways. A similar phenomenon occurs in proximity to rail lines that support diesel locomotive operations. Accordingly, it would be prudent to consider risk-reducing mitigation strategies such as set-backs for residential and other sensitive land uses from major traffic corridors and rail lines and/or to identify measures for sensitive land uses proposed in areas near such sources.

Portions of Seattle are also exposed to relatively high cancer risk values from stationary sources. Risks could be similarly high near port operations where ship emissions and diesel locomotive emissions and diesel forklift emissions can all occur. Similarly, distribution centers that involve relatively high volume of diesel truck traffic can also represent a risk hazard to nearby sensitive land uses. This would also warrant consideration of setbacks from industrial sources for residential and other sensitive land uses and/or measures to reduce the potential risk for receptors proposed in areas near such sources. This is considered a moderately adverse impact to air quality.

~~Fourteen urban villages are within 200 meters of a major highway, rail line, or port terminal. In both action alternatives, these urban villages account for about 50 percent of all projected residential growth in the city through 2035, though only a portion of each urban village is within the 200-meter buffer and therefore the portion of new residents who could be affected would be smaller. Of the fourteen urban villages within 200 meters of a major highway, rail line, or port terminal the ones with the~~

highest proportion of the urban village affected represent 47 percent of all projected residential growth in the city through 2035, compared to 49 percent for Alternative 2 and 48 percent for Alternative 1. The proportion of urban village area affected for the Preferred Alternative would be similar to that of Alternatives 2 and 3. Only a portion of each urban village is within the 200-meter buffer, so the potentially affected portion of the new residents would be smaller. The action alternatives also include development capacity increases within this 200-meter buffer and outside urban villages. Under any alternative, increased residential densities could be expected within this buffer.

The following urban villages are within the 200 meter buffers:

- First Hill–Capitol Hill
- University District (the Ravenna Urban Center Village and a small portion of the University District Northwest Urban Center Village)
- Northgate
- Bitter Lake
- Fremont
- Lake City
- 23rd & Union–Jackson
- Aurora–Licton Springs
- Eastlake
- Green Lake
- North Beacon Hill
- Roosevelt
- South Park
- Wallingford

This potential increased exposure to cancer risk is considered a potential moderate adverse impact related to air quality.

Accordingly, it would be prudent to consider risk-reducing mitigation strategies such as setbacks for residential and other sensitive land uses from major traffic corridors, rail lines, port terminals, and point sources of particulates from diesel fuel.

Greenhouse Gases and Climate Change

The scale of global climate change is so large that the impacts of one action can be considered only on a cumulative scale. It is not anticipated that a single development project or programmatic action, even at the

citywide scale of MHA, would have an individually discernible impact on global climate change. It is more appropriate to conclude that GHG emissions from future development in Seattle would combine with emissions across the state, country, and planet to cumulatively contribute to global climate change.

Construction-Related Greenhouse Gas Emissions

During construction activities, diesel-powered demolition and construction equipment would emit GHGs. Other emissions during construction would result from trucks used to haul construction materials to and from sites and from vehicle emissions generated during worker travel to and from construction sites. Industrial equipment operations, which include the operation of construction equipment, represent approximately 3.2 percent of the emissions estimated in the 2014 GHG emissions inventory (City of Seattle 2016).

Construction-related GHG emissions from any given development project that may occur in the next 20 years would be temporary and would not represent an ongoing burden to the City's inventory. However, varying levels of construction activities in Seattle would occur cumulatively under any alternative, and thus cumulative construction-related emissions would be more than a negligible contributor to GHG emissions in the city. An estimate of the GHG emissions resulting from 20 years of construction envisioned under the alternatives was calculated using the City's SEPA GHG Emissions Worksheet. Estimated total construction-related emissions are 13.8 million metric tons of CO₂e under Alternative 1, ~~45.8~~ 16.6 million metric tons under Alternative 2, and ~~45.6~~ 16.4 million metric tons under Alternative 3, and 16.7 million metric tons under the Preferred Alternative. The estimated total construction-related emissions also include "embodied" or "life-cycle" emissions related to construction, such as those generated by the extraction, processing, and transportation of construction materials.

The Climate Action Plan recognizes the relevance of construction-related GHG emissions and includes actions to be implemented by 2030 to address them:

- Support new and expanded programs to reduce construction and demolition waste, such as creating grading standards for salvaged structural lumber so that it can be more readily reused;
- Expand source reduction efforts to City construction projects, and incorporate end-of-life management considerations into City procurement guidelines; and

- Phase-in bans on the following construction and demolition waste from job sites and private transfer stations: recyclable metal, cardboard, plastic film, carpet, clean gypsum, clean wood and asphalt shingles.

Consequently, although construction-related emissions would not be negligible, the combination of regulatory improvements and actions already underway means that construction-related GHG emissions associated with all three alternatives would be considered a minor adverse air quality impact.

Transportation-related Greenhouse Gas Emissions

The approach to estimating future year transportation-related GHG emissions considers two factors:

- The projected change in vehicle miles traveled (VMT)
- The projected change in fuel economy of the vehicle fleet

VMT in 2035. Travel demand models include findings about projected vehicle miles traveled in future years for various classes of vehicles (e.g., cars, trucks, buses). The model generally assumes a continuation of current economic and demographic trends, with minor shifts toward shorter trips and more trips made by modes other than automobile travel. This will reduce VMT per capita, but total VMT in the region would continue to rise modestly due to population and employment growth.

If projected based solely on the increase in VMT, with no changes assumed to fuel economy, emissions under each alternative would increase about 15 percent compared to 2015. But the trend toward more stringent federal standards makes it reasonable to assume improved fuel economy by 2035.

Fuel Economy in 2035. Federal programs mandate improved fuel economy and reduced GHG emissions for passenger cars and light trucks in 2017-2025. According to those standards, fuel economy for passenger cars and light trucks would improve from 33.8 miles per gallon (mpg) in 2015 to 54.5 mpg by 2025. This equates to a GHG emissions decrease of roughly 38 percent for new passenger cars and light trucks entering the vehicle fleet (U.S. EPA 2010; 2012). Similarly, EPA and the NHTSA issued fuel efficiency standards for medium and heavy trucks for model years 2014 to 2018 (phase one) and model years 2018-2027 (phase two). When these standards are fully phased in, tractor-trailers will achieve up to 25 percent lower CO₂ emissions and fuel consumption than in 2018 (NHTSA, 2016).

Although these regulations will result in improved fuel economy for new vehicles, older vehicles would still comprise some portion of the 2035 fleet. To account for this, the analysis used the California Air Resource Board's EMFAC 2011 tool, which includes GHG emissions forecasts adjusted for future vehicle fleet composition. The resulting estimate is that GHG emissions of the 2035 vehicle fleet would be 30 percent lower than the 2015 vehicle fleet for passenger cars and light trucks. For heavy trucks, 2035 GHG emissions are projected to be four percent lower than 2015 emissions. Note that these reflect conservative assumptions of no additional gains in new vehicle fuel economy beyond 2025.

Fuel economy for buses was also considered. King County Metro (KCM) and Sound Transit (ST) set goals for GHG emission reductions in their respective sustainability plans. KCM's goal equates to a roughly 41 percent reduction in emissions between 2015 and 2030 (KCM 2014). ST's goal equates to a roughly 30 percent reduction in emissions between 2015 and 2030 (Sound Transit 2014). For this analysis, bus emissions were assumed to be reduced by 35 percent between 2015 and 2030. This is a conservatively low assumption given that most of the fleet is operated by KCM, which has a higher reduction goal, and the EIS horizon year is 2035, five years beyond the goal date set by each transit agency.

Results. All alternatives generate roughly the same annual GHG emissions, as shown in Exhibit 3.9–3. Alternatives 2 and 3 would have the highest transportation-related GHG emissions. Since the growth amounts for the Preferred Alternative are the same or smaller than for the City as a whole, and that all the individual urban village growth amounts are within the range studied for Alternatives 2 and 3, GHG emissions for the Preferred Alternative are assumed to be similar to the GHG emissions from Alternatives 2 and 3. Alternative 1 No Action

Exhibit 3.9–3 Road Transportation GHG Emissions in Metric Tons of CO₂e per Year

Vehicle Type	2015 Existing	2035 Alternative 1 No Action	2035 Alternative 2	2035 Alternative 3
Cars and Light Trucks	1,653,000	1,426,000	1,447,000	1,447,000
Heavy Trucks	563,000	694,000	701,000	701,000
Buses	65,000	43,000	43,000	43,000
Vanpools	2,000	2,000	2,000	2,000
Total	2,283,000	2,165,000	2,193,000	2,193,000

Source: ESA, 2017; Appendix L.

would have the lowest GHG emissions. But the variation is within 1.3 percent. All alternatives would generate lower GHG emissions than in 2015 because the projected improvements in fuel economy outweigh the projected increase in VMT.

GHG emissions can also be considered from a regional perspective. While the variation among the alternatives' projected emissions in Seattle is minor, the same amount of growth in other jurisdictions in the area would result in very different results. To that end, VMT for auto trips with at least one endpoint outside Seattle was compared to VMT for trips with at least one endpoint in Seattle. VMT per population/job is nearly 55 percent higher outside of Seattle (but within the four-county—Snohomish, King, Kitsap, Pierce—region) than inside Seattle. This suggests that the same amount of development outside Seattle would result in substantially higher emissions since 2035 fuel economy would remain equivalent across jurisdictions. Exhibit 3.9–3 shows road transportation GHG emissions.

IMPACTS OF ALTERNATIVE 1 NO ACTION

Alternative 1 would not implement MHA or increase development capacity. 76,746 new households are expected under Alternative 1, similar to the 20-year minimum growth estimate of 70,000 additional households in the Seattle 2035 Comprehensive Plan. Under Alternative 1, redevelopment, demolition, and new construction projects could occur in the study area.

Air Quality

Transportation and Energy-Related Emissions

Under Alternative 1, VMT in the study area would increase due to population and employment growth. Projected changes in VMT were extracted from the projected travel demand model for automobiles and light-duty trucks and for medium and heavy-duty trucks. The travel demand model generally assumes existing economic and demographic trends continue with minor changes due primarily to mode share shifts and shortened trips due to increased traffic congestion. These changes cause projected VMT per capita to decline slightly by 2035, but total VMT would continue to rise due to population and employment growth. Increases in energy related emissions (e.g., natural gas usage in residential and commercial buildings) would increase emissions of air pollutants of concern.

Exhibit 3.9–4 Road Transportation and Energy-Related Pollutant Emissions in Tons per Year

Source	2015 Existing	2035 Alternative 1 No Action	2035 Alternative 2	2035 Alternative 3
Carbon monoxide (CO)	130.63	36.66	38.68	38.78
Oxides of nitrogen (NO _x)	134.76	18.07	22.55	22.69
Fine Particulate Matter (PM _{2.5})	9.30	2.90	3.18	3.19
VOC	9.73	1.53	1.80	1.80

Source: ESA, 2017.

All alternatives in 2035 are expected to generate lower air pollutant emissions than in 2015, resulting in a net decrease in transportation- and energy-related air pollutant emissions. This is because the projected improvement in fuel economy outweighs the projected increase in VMT. Exhibit 3.9–4 shows transportation and energy-related pollutant emissions of VOC, NO_x, CO, and PM_{2.5} in tons per year.

Greenhouse Gases and Climate Change

Under the Alternative 1, changes in operational GHG emissions would result from increases in VMT, fuel efficiency improvements to the vehicle fleet, increased electrical and natural gas use, and solid waste generation. GHG emissions from electrical use are generated when energy consumed is generated by the non-renewable resources of an electrical supplier, such as Seattle City Light. However, Seattle City Light is carbon neutral and consistent with the Climate Action Plan. Therefore, no GHG emissions related to electricity are assumed because Seattle City Light will maintain its commitment to carbon neutrality. GHG emissions from natural gas are direct emissions resulting from on-site combustion for heating and other purposes. Solid waste-related emissions are generated when the increased waste generated by development is disposed in a landfill where it decomposes, producing methane gas.

Energy Generated GHG

GHG emissions from energy demand are calculated using default data from the CalEEMod land use model (version 2016.3.1). These emissions are then adjusted to account for increased efficiency implemented through performance requirements fostered by the Climate Action Plan.

Solid Waste-Generated GHG

Increased emissions from solid waste generation were estimated using the most recent (2015) waste generation rate (Seattle Public Utilities, 2016). These emissions were then adjusted to account for waste diversion implemented through waste reduction, recycling, and composting fostered by the City's carbon-neutral goal target of 70 percent waste diversion by ~~2030~~ 2022.

Total Emissions

Exhibit 3.9–5 and Appendix L show operational GHG emissions from Alternative 1. No significant adverse impacts are identified with respect to these GHG emissions. The emissions reductions from Alternative 1 would be the greatest of any of the three alternatives, largely due to larger VMT reductions than the other alternatives, a reflection of fewer new households and jobs.

Exhibit 3.9–5 Operational GHG Emissions of Alternative 1 No Action and Alternatives 2, ~~and 3,~~ and the Preferred Alternative in Metric Tons of CO₂e per Year

Source	2035 Alternative 1 No Action	2035 Alternative 2	2035 Alternative 3
Transportation (Citywide)	-118,000	-90,000	-90,000
Building Energy–Residential	9,552,565	12,835,775	12,983,915
Building Energy– Commercial	2,252	2,694,522	2,662,495
Solid Waste	20,263	25,814,165	25,710,076
Total	-85,933,924	-48,657,49,538	-48,645,49,515

Source: ESA, 2017.

IMPACTS OF ALTERNATIVE 2

Alternative 2 would make zoning changes, modify the Land Use Code, and implement MHA, resulting in 63,070 new households in the study area, 39 percent more than Alternative 1.

Air Quality

Transportation and Energy-Related Emissions

Transportation and energy-related air pollutant emissions under existing conditions and each alternative are presented in Exhibit 3.9–4 and Appendix L.

As shown in Exhibit 3.9–4, regional pollutant emissions for each pollutant under Alternative 2 would be more than Alternative 1. This reflects the projected increase in VMT in Alternative 2 compared to Alternative 1. This percent difference is minimal. However, as indicated in Exhibit 3.9–4, all alternatives would result in air quality improvements compared to baseline due to increased fuel efficiency and a cleaner vehicle fleet.

Greenhouse Gases and Climate Change

GHG emissions under development of Alternative 2 were calculated using the same methodologies as Alternative 1 but reflect the differences among the alternatives. Operational GHG emissions from Alternative 2 are presented in Exhibit 3.9–5 and Appendix L. No significant adverse impacts are identified with respect to these GHG emissions. The emissions reductions from Alternative 2 would be the second greatest of any of the three alternatives, largely as the result of greater VMT which reflects the greater number of residential development and jobs.

IMPACTS OF ALTERNATIVE 3

Alternative 3 would make zoning changes, modify the Land Use Code, and implement MHA, resulting in 62,858 new households in the study area, 38.6 percent more than Alternative 1.

Air Quality

Transportation and Energy-Related Emissions

Transportation and energy-related air pollutant emissions under existing conditions and each of the three alternatives are presented in Exhibit 3.9–4 and Appendix L.

As shown in Exhibit 3.9–4, regional pollutant emissions under Alternative 3 would be more than Alternatives 1 and 2. This is because of the projected increase in VMT in Alternative 3 compared to Alternatives 1 and 2. This percent difference is minimal. However, as indicated in Exhibit 3.9–4, all alternatives would result in air quality improvements compared to baseline due to increased fuel efficiency and a cleaner vehicle fleet.

Land Use Compatibility and Public Health Considerations

Of the 14 urban villages within 200 meters of a major highway, rail line, or port terminal, the ones with the highest proportion of the urban village affected represent 47 percent of all projected residential growth in the city through 2035, compared to 49 percent for Alternative 2 and 48 percent for Alternative 1. Only a portion of each urban village is within the 200-meter buffer, so the potentially affected portion of the new residents would be smaller.

Greenhouse Gases and Climate Change

GHG emissions under development of Alternative 3 were calculated using the same methodologies as those used for Alternatives 1 and 2 but reflect the differences among the alternatives. Operational GHG emissions from Alternative 3 are presented in Exhibit 3.9–5 and Appendix L. No significant adverse impacts are identified with respect to these GHG emissions. The emissions reductions realized from implementation of Alternative 3 would be less than those of Alternatives 1 and 2.

IMPACTS OF THE PREFERRED ALTERNATIVE

The Preferred Alternative would make zoning changes, modify the Land Use Code, and implement MHA, resulting in 62,387 new households in the study area, 37.5 percent more than Alternative 1.

Air Quality

Transportation and Energy-Related Emissions

Regional pollutant emissions under the Preferred Alternative would be similar to Alternatives 2 and 3. This is because the growth amounts for the Preferred Alternative are about the same or smaller than for the city as a whole, and because the individual urban village growth amounts are within the range studied for Alternatives 2 and 3. As indicated in Exhibit 3.9–4, all alternatives would result in air quality improvements compared to baseline due to increased fuel efficiency and a cleaner vehicle fleet.

Greenhouse Gases and Climate Change

GHG emissions under development of the Preferred Alternative would be similar to Alternatives 2 and 3. This is because the growth amounts for the Preferred Alternative are about the same or smaller for the city as a whole, and that the individual urban village growth amounts are within the range studied for Alternatives 2 and 3. No significant adverse impacts are identified with respect to these GHG emissions.

New to the FEIS

Impacts of the Preferred Alternative is a new section since issuance of the DEIS

3.9.3 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 this project, including potential setbacks to separate residences and other “sensitive receptors” (i.e. hospitals, schools, daycare facilities, senior housing) from freeways, railways, and port facilities. Where separation by a buffer is not feasible, consider filtration systems for such uses. No other mitigation would be required. As an integrated plan feature under the Preferred Alternative, the minimum zoning capacity increases necessary to implement MHA are applied in areas within 500’ of freeways.

3.9.4 SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

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

4



COMMENTS AND RESPONSES.

Chapter 4 of this Final Environmental Impact Statement (FEIS) contains public comments provided on the Draft EIS during the comment period and provides responses to those comments. The Draft EIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period. Comments gathered include all public comments received through e-mails, the online commenting form, hard copy written letters, and verbal comments during the June 29th public hearing.

4.1 ORGANIZATION OF PUBLIC COMMENTS

Many of the public comments touch on common issues and themes. Responses to frequently raised issues are provided first. Frequent comment responses are used to respond to individual comments that address the topic by reference (see Section 4.2).

Individual comments and responses that were received in written form via e-mail, the online comment forms, or hard copy written letter are organized in alphabetical order by Last Name, First Name. Where a commenter has provided more than one communication, each is given a unique number, such as Last Name, First Name-#. Preceding the individual comments, there is a table with all commenters listed (see Exhibit 4–3 on page 4.29). Where a commenter submitted comments on behalf of an organization or group that is indicated in the table. Unique comments are numbered in the e-mail, letter or form, and responses are provided. The marked e-mails, letters and forms are provided at the end of the Chapter (see Section 4.5 on page 4.471). Responses to comments received verbally during the June 29th public hearing follow comments that were received in written form (see Section 4.4 on page 4.457 and Exhibit 4–4). Transcripts of the verbal public hearing comments are provided (see Section 4.5 on page 4.471).

Comments that state an opinion or preference are acknowledged with a response that indicates the comment is noted. Comments that ask questions, request clarification or corrections, or are related to the Draft EIS analysis are provided a response that explains the EIS approach, offers corrections, or provides other appropriate replies. Responses to individual comments are provided in Section 4.3 starting on page 4.29.

4.2 RESPONSES TO FREQUENT COMMENTS

Exhibit 4–1 Summary of Frequent Comment Topics

Topic	Description
Individual urban village review	Impact to each urban village should be examined individually and in greater detail.
Citywide impacts	The EIS does not adequately address citywide impacts to the city as a whole
Impact on Racial and Cultural Minority Groups	The DEIS includes inadequate racial equity analysis. More analysis of cultural displacement should be included.
Displacement risk / access to opportunity typology	The displacement risk / access to opportunity typology is flawed or is not accurately applied to an urban village
Alternatives that could meet objectives	Alternatives to the MHA proposal that could achieve the stated objectives were not considered
MHA affordable housing requirements	MHA affordable housing requirements are too low
Location of MHA affordable housing units	Concern that MHA affordable housing units from payment will not be located in an urban village or near to where development occurs. The MHA units should be required on site.
Impacts to public schools	There is a lack of coordinated planning with Seattle Public Schools and analysis of impacts on Seattle Public Schools is not sufficient.
Impacts to historic resources	Analysis of historic resources is not adequate or specific enough to local areas.
Impacts to tree canopy	There will be a loss of tree canopy due to the proposal. Impacts on tree canopy are underestimated.
Parking impacts and mitigations	Impacts to on-street parking are not adequately addressed. Identified mitigation for on-street parking impacts will not be effective.
Family-friendly housing	Concern that the proposal will not create family sized housing units or affordable family housing units that are conducive to families.
Public lands for affordable housing	Public land should be used to create affordable housing as an alternative to the MHA.
Single family zones outside of urban villages	Single Family zones throughout Seattle should be rezoned to allow a greater variety of housing or to enact affordable housing requirements.
Impacts to sanitary sewer systems	There will be impacts to sanitary sewer systems due to the proposal.
Natural parks lands policies	Opposition to policy or use changes for natural park lands.
Community engagement	There has not been enough community engagement on the proposal.
Displacement analysis	Concern that the proposed action will result in a greater number of displaced households than estimated. The impacts of potential household displacement are not adequately analyzed.
Stormwater infrastructure	There will be impact to stormwater infrastructure due to the proposal. Analysis of stormwater infrastructure is not adequate.
Cumulative impacts	The EIS did not consider cumulative impacts, including combination of the impacts of the proposed action with other pending actions.

Source: City of Seattle, 2017.

INDIVIDUAL URBAN VILLAGE REVIEW

The EIS does not recognize and examine unique features of each urban village. Each Urban Village is unique, with different housing types, cultural traditions, businesses, resources, and growth needs. Each urban village should have an individual environmental review.

For programmatic proposals, including implementation programs like MHA, State Environmental Protection Act (SEPA) Rules require that an EIS contain only a general discussion of the impacts of alternative proposals for plans, land use designations, or implementation measures; site specific analyses are not required for individual geographic areas (WAC 197-11-442(3) and (4)). Therefore, analysis of certain impacts in the MHA DEIS is appropriate at a broader scale that does not detail impacts at a project level or sub-areas scale for some aspects.

Notwithstanding these limitations, the DEIS does contain substantial information and analysis of potential impacts to individual urban villages. Residential and commercial growth projections are estimated for each urban village individually, for example (DEIS Exhibit 2-7 and 2-8). The action alternatives provide individual maps for specific urban villages to identify MHA development capacity increases (Appendix H). Specific urban village boundary expansions are also described and analyzed for each urban village where there is potential for a boundary expansion. Potential impacts associated with these proposed changes are analyzed at the level of each affected urban village.

In addition, each urban village's demographic and physical characteristics were considered and used to classify urban villages according to their displacement risk and access to opportunity type, consistent with the 2015 Growth and Equity Analysis (See appendix A). Approaches to MHA implementation in the action alternatives also vary according to the displacement risk and access to opportunity types. However, for urban villages within the displacement and access to opportunity types, potential impacts are still evaluated specific to the urban village.

Potential impacts to each urban village are analyzed and discussed individually in Chapter 3. Depending on the element of the environment, and the intrinsic factors of the topic, a greater or lesser amount of specificity is provided for an individual urban village. Examples of analysis specific to individual villages include the following: in Section 3.1 Housing and Socioeconomics, the amount of MHA affordable performance units that would be built in each urban village is estimated (DEIS Exhibit 3.1-36); in Section 3.2 Land Use, a discussion of

land use impacts is provided for each type of proposed zoning change, and then summarized for individual urban villages; in Section 3.3 Aesthetics, the location of higher impact (M1) and (M2) zoning changes are identified within each urban village; in Section 3.5 Historic Resources metrics of historic resources and inventories are provided for each urban village; and in Section 3.7 Open Space and Recreation, metrics about the availability of parks is provided for each urban village.

Some elements of the environment do not lend themselves as well to analysis at the urban village scale or geography. For example, transportation analysis of impacts in Section 3.4 considers impacts at specific roadway corridors, bus routes, or travel screen lines. Such analysis provides detail to specific locations that are not necessarily an urban village.

The DEIS is a programmatic environmental impact statement that uses an appropriate level of analysis to evaluate the effects of a broad proposal that may include a wide range of individual projects, and that may be implemented over a long timeframe, and/or across a large geographic area.

SEPA does not require that the City prepare separate analyses or documents for each urban village. The SEPA Rules do require that actions which are interdependent, and where one could not feasibly proceed without the other, must be evaluated in the same environmental document (WAC 197-11-060(3)b). Proposals which are related, or similar in nature but not dependent on each other, however, may be evaluated in the same or different documents at the lead agency's option (WAC 197-11-060(c)). For MHA, rezoning to implement MHA could occur for one or some urban villages without others; they are not interdependent pieces of the same action. Rezoning of individual urban villages to implement MHA are separate and independent and related, therefore, and the City is within its discretion to address rezoning in a single document.

CITYWIDE IMPACTS

The DEIS does not address how the whole City will be impacted by the changes both in this DEIS and the other SEPA analyses combined.

As discussed in DEIS Section 2.2 Planning Context, the DEIS formally adopts the Seattle 2035 Comprehensive Plan EIS from May of 2016 to provide current and relevant environmental information. This EIS builds

on the prior Seattle 2035 analysis, which addresses growth patterns in the city as a whole. The SEPA Rules encourage Incorporating existing environmental documents in this manner (WAC 197-11-600 and 197-11-630), which helps to reduce unnecessary repetition in environmental documents on related actions. As noted in the DEIS, the MHA program is an implementation action that attempts to address significant housing issues that were identified in the Comprehensive Plan EIS. The Seattle 2035 Comprehensive Plan and EIS provide key context and conclusions that help to evaluate the MHA proposed action. Action Alternatives in the MHA EIS evaluate growth patterns for the city as a whole in the context of the Seattle 2035 Comprehensive Plan. Relevant conclusions of the Comprehensive Plan EIS are noted throughout the DEIS and related to the MHA alternatives.

The DEIS is focused on identifying potential impacts from MHA implementation in the study area, which is defined to include all urban villages and commercial and multi-family zoned lands that are outside of Downtown and South Lake Union, the University District, Uptown, and the designated manufacturing industrial centers. (See Chapter 2 study area map). That focus is appropriate and consistent with the scope of the MHA proposal, as required by the SEPA rules for non-project/ programmatic actions such as for plans and implementation programs (WAC 197-11-442(2) and 197-11-442(4)).

The DEIS also, however, incorporates and reflects current and relevant information about expected growth, including evaluations in existing environmental documents, in areas outside of the study area. As seen in DEIS Exhibit 2-7 Residential and Commercial Growth, for example, estimated housing and jobs are provided for the Downtown, South Lake Union, Uptown and University District urban centers, for background information to evaluate cumulative impacts from proposed action in the study area.

Where a broader perspective is relevant to identifying potential indirect and cumulative impacts of the MHA alternatives, the DEIS analyzed impacts on a citywide or systems scale, and does not limit the discussion to urban villages or commercial and multi-family zoned areas in the study area. For example, the Transportation analysis in Section 3.4 is based on a citywide computer model of traffic for the city as a whole, including areas outside of the study area and even outside of the city. Consideration of traffic patterns inside and outside the study area is needed to establish background conditions so transportation impacts from changes in the study area can be analyzed in the context of the whole city. Similarly, potential impacts from the proposed action on Parks

and Open Space (Section 3.7), Public Services and Utilities (Section 3.8) and other elements of the environment are analyzed relative to citywide levels of service standards, and services for the city as a whole.

IMPACTS ON RACIAL AND CULTURAL MINORITY GROUPS

The DEIS includes inadequate racial equity analysis. The focus on household income as a predictor of displacement misses a determinant of who could be displaced. Analysis of cultural displacement and institutionalized racism in the housing market should be included.

The FEIS expands Section 3.1 Housing and Socioeconomics to more directly address potential impacts on racial and cultural minority populations, and the displacement analysis is expanded to more fully analyze cultural displacement.

The DEIS includes analyses of racial and equity impacts and displacement, which were informed by the 2016 Growth and Equity Analysis (Appendix A). The Alternatives were structured according to urban villages' differing levels of displacement risk and access to opportunity as identified in the indices in the Growth and Equity Analysis. (See Section 2.2). The Displacement Risk Index identifies areas of Seattle where displacement of marginalized populations may be more likely. The Access to Opportunity Index identifies populations' access to certain key determinants of social, economic, and physical well-being. The indices are each based on a compilation of 14 demographic factors, including race, linguistic isolation, and educational attainment. (See Appendix A). By varying the approach to MHA implementation by urban villages' Displacement Risk / Access to Opportunity, the EIS provides information about how the proposed action could have greater or lesser impacts on areas of the city with marginalized communities.

The DEIS analysis of displacement includes a quantitative estimate of direct displacement of low-income households (DEIS Exhibit 3.1-39, 3.1-40) due to demolition of housing. The DEIS analyzed impacts of economic displacement due to increases in market rate housing costs. (DEIS page 3.59, 3.60). Cultural displacement and commercial displacement impacts are discussed qualitatively (DEIS page 3.60, 3.61). The DEIS also provided race and ethnicity demographic information in the affected environment section, and summarized recent demographic changes to minority population. (DEIS pages 3.4–3.7).

The following summarizes additional analysis and content that is added in the FEIS:

Add a Historical Context Subsection

A new narrative subsection in the Affected Environment section of Section 3.1 describes the historical patterns and practices of racial exclusion and discrimination in land use.

Summarize the 2017 Assessment of Fair Housing

A new subsection in the Affected Environment section describes and summarizes key findings from the City's 2017 Assessment of Fair Housing (AFH). It discusses how strategies to decrease segregation identified in the AFH complement but differ from the City's strategies to increase affordable housing.

Add More Race-Specific Demographic Data

Additional data specific to race is included in the Affected Environment section. The DEIS included data on topics such as household income, housing cost burden, and housing tenure, and relied on the Displacement Risk index to identify areas with marginalized population. The FEIS breaks down demographic information further by race/ethnicity subgroup. These breakdowns can support how findings in the Impacts section could disproportionately impact or benefit households of color.

Identify Locations of Communities of Color More Clearly

An expanded section in Affected Environment identifies specific neighborhoods/areas of the city with high concentration of households of color using metrics from the 2017 Assessment of Fair Housing. This information facilitates more in depth discussion of the potential impacts to communities of color in the Impacts section. While the DEIS categorized neighborhoods according to displacement risk (which includes race and other demographic factors), the additional information focuses specifically on race.

Strengthen Discussion of Cultural Displacement

An expanded subsection on cultural displacement is included in the FEIS. (Affected Environment; Impacts Common to All Alternatives; and in impacts of alternatives.) The cultural displacement section discusses cultural aspects of displacement, including how social cohesion plays an important role in location decision for members of communities of color. This includes cultural businesses, cultural hubs, and varied cultural

networks and supports. The discussion enhances the qualitative analysis of cultural displacement impacts.

Improve and Update Analysis of Relationship between Development and Displacement

In the economic displacement section, the DEIS analyzed Housing Development and Change in Low-Income Households (DEIS Exhibits 3.1-29–Exhibit 3.1-31 and discussion). The analysis evaluated the correlation between housing production and changes in the number of low-income households by census tract. The FEIS includes several revisions to the existing analysis, and adds additional correlation analysis focused on race instead of income:

- **Update the control for subsidized housing units:** The DEIS analysis controlled for households that received HUD assistance but not for all subsidized housing units. The FEIS accounts for a more comprehensive dataset of subsidized housing from any source to isolate the relationship of solely market-rate housing production and changes in the number of low-income households living in unsubsidized housing.
- **Update the data to use the most recent 2010–2014 ACS data:** Since the time of preparing the DEIS, the Census Bureau released new ACS data for the 2010–2014 period—one year more recent than the 2009–2013 ACS data used in the DEIS, which is included in the FEIS.
- **Analyze the relationship between housing production and gain or loss of low-income households earning up to 80 percent of AMI:** The DEIS analyzed changes in the number low-income households earning up to 50 percent of AMI. The FEIS expands the income range of this analysis to evaluate the relationship using households earning up to 80 percent of AMI.
- **Analyze relationship between housing production and changes in the number of households of color:** An additional correlation analysis between the gain or loss of non-white households and net housing production is included in the FEIS. This analysis evaluates the relationship between net housing production and displacement of people of color.
- **Analyze the relationship between housing production and gain or loss of black/African American households:** An additional correlation analysis between the gain or loss of black/African American households and net housing production is provided in the FEIS. This analysis evaluates the relationship between housing production and displacement of black/African Americans.

Conclusions of the additional correlation analysis support a finding that the dynamics of economic displacement due to development are somewhat different for low-income populations and for racial minority populations. Recent data show that areas where more housing was developed are not correlated with areas that experienced a loss of low income populations. There is in fact a positive correlation between areas that gained more housing and gain of low-income households. This same relationship is not present between racial minority populations and areas with more development. There was no statistical correlation between development and gain or loss of racial minority populations. Other factors aside from development, including potential cultural aspects of displacement, are at play in the explanation of gains or losses of racial minority populations. Expanded discussion of these results is in Section 3.1.

It should be noted that while racial equity is an important policy issue and consideration in City decisions, racial equity and similar socioeconomic issues are not environmental issues that must be considered in environmental impact statements (WAC 197-11-448). Similarly, the City's SEPA policies do not address socioeconomic issues (SMC 25.05.665). While agencies have the option of including information about non-environmental issues in an EIS, socioeconomic studies do not have a bearing on whether an EIS complies with the requirements of SEPA (WAC 197-11-440(8)). Nevertheless, the City has expanded the analysis in the EIS in response to comments, and to provide additional information to decision makers.

DISPLACEMENT RISK / ACCESS TO OPPORTUNITY TYPOLOGY

The displacement risk / access to opportunity typology is flawed. The factors considered are not clear or are erroneous. The typology appears to be wrong for an urban village. The typology does not present a spectrum of displacement risk or access to opportunity. The typology should not be used as a planning tool.

It is acknowledged that some DEIS comments expressed differing opinions about the conclusions of the analysis of displacement risk in the DEIS or a preference for employing different approaches or methodologies. However, the displacement risk/access to opportunity typology used, and the resulting analysis in the DEIS, are believed to provide a rational, informative and helpful framework for evaluating the potential impacts of focusing additional growth in different geographic locations. Pursuant to the SEPA Rules, the lead agency has the

discretion to identify and employ appropriate methodologies for impact analysis (WAC 197-11-442(4)).

Potential residential displacement was raised as an important topic during community outreach efforts for the 2035 Comprehensive Plan and during the scoping process for the MHA EIS. In September of 2016, the City Council passed Resolution 31711, which renewed the emphasis on race and social equity in the Comprehensive Plan update and other planning actions by the city. One of the objectives of the MHA proposed action is to identify alternatives that help to distribute the benefits and burdens of growth equitably.

The Displacement risk / access to opportunity typology is derived from the *Growth and Equity Analysis* that was prepared as an addendum to the Seattle 2035 Comprehensive Plan EIS, and was formally adopted by the City Council. Information from the *Growth and Equity Analysis* was used in the MHA EIS to address the issue of displacement and to allow for an analysis of the extent to which the proposal would distribute the benefits and burdens of growth equitably. Categorizing urban villages by their relative displacement risk and access to opportunity allows the EIS to evaluate whether or not and to what extent impacts could disproportionately impact or benefit historically marginalized populations.

The specific indicators used to construct the displacement risk and access to opportunity types are listed in Appendix A Table 3 and Table 4. Limitations to the data and the currency of information these indices are based upon, are described on page 15 of Appendix A. Despite the limitations, the 14 indicators taken together provide objective information about urban villages based on the sources listed in Tables 3 and 4. This objective information is the most recent, compiled information that was thoroughly vetted and approved which could be used to inform decision makers on the topic of displacement.

The displacement risk and access to opportunity typology provided some input to the formulation of the MHA DEIS alternatives. The indices were used to create varied alternative patterns of the MHA zoning changes and potential growth patterns for study purposes. Specific potential impacts associated with the alternatives, including potential impacts to individual urban villages, are discussed in Chapter 3 of the DEIS. Potential environmental impacts to an urban village are analyzed and disclosed irrespective of how the alternative was formulated.

ALTERNATIVES THAT COULD MEET OBJECTIVES

The DEIS did not review any alternatives to MHA that could achieve the proposed objectives. Alternatives 2 and 3 use the same approach. They are both versions of MHA that would increase zoning capacity to mandate an affordable housing requirement.

The MHA proposal is an implementation program and is categorized as a non-project or programmatic action for purposes of SEPA review. For these types of programmatic actions, The SEPA rules accord the lead agency flexibility when it prepares EISs and formulates the alternatives which are formally proposed or reasonably related to the proposed action. In addition, the alternatives required in an EIS are limited to those that are consistent with the proposal's objectives, and are reasonable in range and number.

The concept of implementing a requirement to provide (or pay for) affordable housing through and in connection with granting additional development capacity is inherent to the definition of the proposal that is the subject of this EIS, and is evident in the objectives for the proposal as well. The DEIS evaluated a No Action alternative, and two action alternatives that would both implement MHA requirements. The Action Alternatives differ in the intensity and location of development capacity increases and the patterns and amounts of growth across the city that could result.

Certain alternatives varying aspects of MHA implementation were considered but not carried forward for detailed analysis in the DEIS, as identified in Section 2.4. No viable alternatives beyond those included in the DEIS were identified by commenters that could meet the project objectives.

A number of comments suggested that an alternative be studied wherein an affordable housing requirement would apply to development without increasing zoning capacity or providing a development incentive, such as in impact fee or an inclusionary housing requirement. As noted above, imposition of MHA requirements is inextricably tied to granting additional development capacity under the definition of the proposal and its objectives. In addition to leveraging development to create new rent- and income-restricted units, those objectives also include increasing overall production of housing to help meet current and projected high demand. The development capacity increases included in the DEIS alternatives would help meet this objective.

Other comments suggest that a development incentive that is voluntary for developers should be studied as an approach to reach the affordable housing unit goal. As addressed in DEIS Section 2.4 however, a voluntary

program would not be expected to reach the project objective of producing at least 6,200 affordable housing units at the 60 percent AMI affordability level, since some development projects could elect not to include affordable housing, in patterns and circumstances that are unpredictable.

Other comments suggested that funding strategies from sources other than development should be studied as an alternative to MHA. These concepts such as a property tax or income tax, or contributions by certain large businesses, would meet neither the definition of the proposal nor its objectives. Nonetheless, the City and other partners are actively pursuing a variety of strategies aside from the MHA proposal to increase affordable housing. Those efforts such as the 2016 increase to the Seattle Housing Levy and many others are described in the recommendations of the 2015 Housing Affordability and Livability Agenda (See Section 2.2 Planning Context).

MHA AFFORDABLE HOUSING REQUIREMENTS

The MHA affordable housing requirements are too low. Higher affordable housing requirements should be studied. The level of affordable housing requirements is a giveaway to developers. The EIS should study significantly higher MHA affordable housing requirements.

The level of proposed MHA affordable housing payment and performance requirements are discussed in Section 2.3. The specific structure and level of the requirements is based on economic analysis and incorporates core concepts such as:

- Comply with a state approved approach for affordable housing programs;
- Scale the amount of the affordable housing requirement proportionally to the size of the development capacity increase (larger zoning increases have larger affordable housing requirements); and
- Account for stronger or weaker market areas of the city

Requirement amounts would be applied consistently for MHA implementation in the study area as well as other program areas not addressed in the study area of this proposed action.

An EIS alternative with significantly higher MHA performance and payment percentages was considered but not included for detailed analysis in the DEIS. See Section 2.4 for further discussion. There is great variation in development feasibility across the many sites in the study area depending on many factors and unique conditions. It would

be speculative and infeasible in a programmatic-level EIS to analyze how varied MHA requirements could affect development feasibility on a more site-specific basis.

LOCATION OF MHA HOUSING UNITS

Concern that MHA affordable housing units from payment will not be located in an urban village or near to where development occurs. MHA units should be required on the site of the development.

The Seattle Office of Housing strategically invests funds generated by MHA to build new income- and rent-restricted housing throughout the city. These funds are awarded along with other sources of funding to non-profit and for-profit development partners.

The Office of Housing has a strong track record of creating affordable housing in neighborhoods throughout the city. A map of affordable housing developments (attached below) shows a pattern of investments throughout Seattle, and not just in one area of the city.

The Office of Housing relies on several criteria to guide allocation of MHA payment funds. The criteria are codified in the Seattle Municipal Code. For purposes of determining the location for use of MHA cash contributions, the City shall consider the extent to which the housing supported by cash contributions advances the following factors:

- Affirmatively furthering fair housing choice;
- Locating within an urban center or urban village;
- Locating in proximity to frequent bus service or current or planned light rail or streetcar stops;
- Furthering City policies to promote economic opportunity and community development and addressing the needs of communities vulnerable to displacement and;
- locating near developments that generate cash contributions.

The criteria are meant to accomplish a range of goals but in totality are expected to avoid some areas being excluded from getting affordable housing, and avoid inequities in how funds would be distributed.

The EIS estimated the number of net new income and rent restricted housing units that would be built in each urban village in DEIS Exhibit 3.1-36. Some of the net new affordable housing units would be located in every neighborhood according to the assumptions.

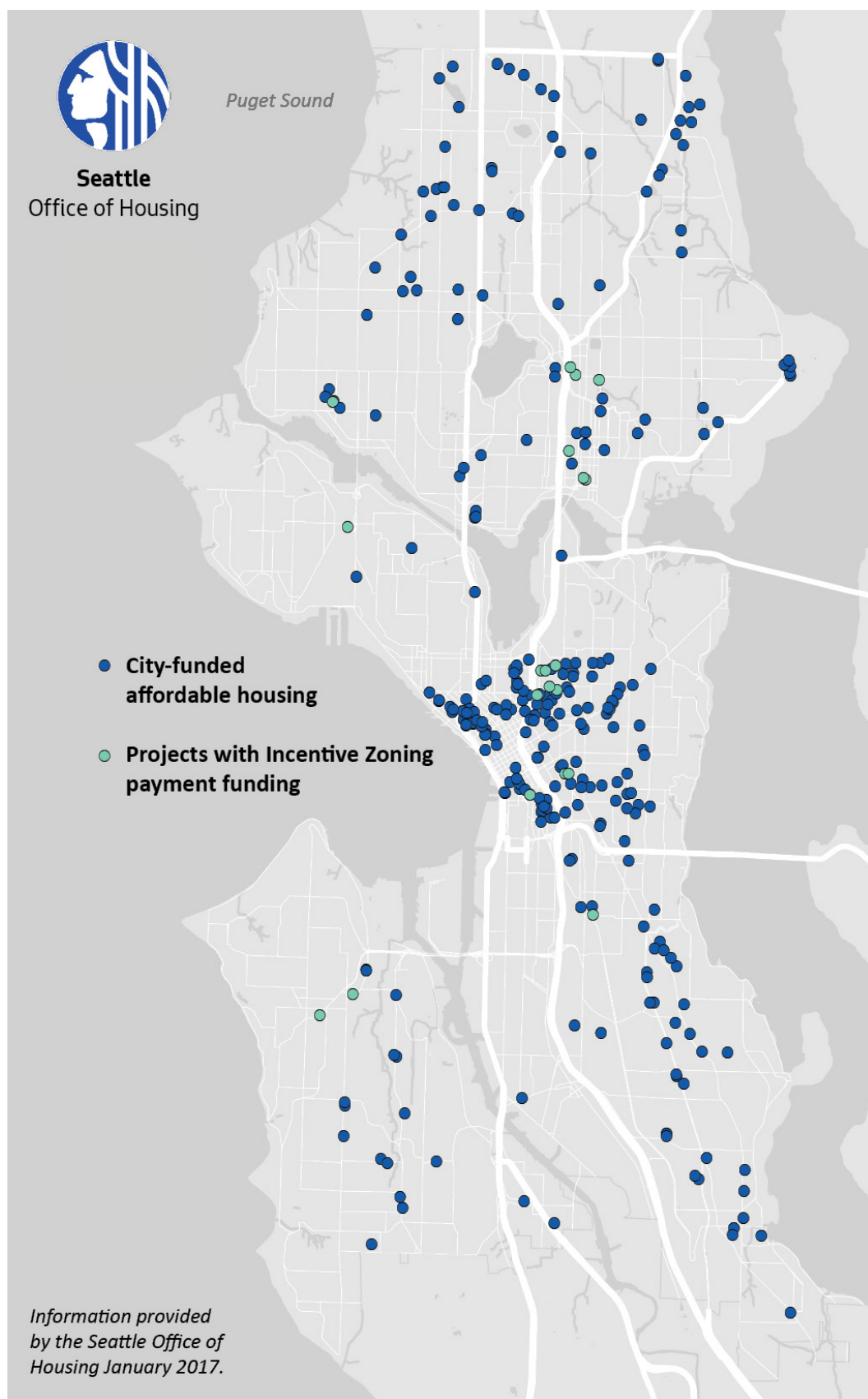


Exhibit 4-2
Rental Housing Program

Source: Seattle Office of Housing, 2017.

Given the relationship between the MHA payment and performance requirements, it is expected that some developers will choose payment and some will choose performance. Since it is reasonable to assume a mix of performance and payment units, the DEIS assumed that half of development projects would elect performance and half would elect payment. Since Office of Housing makes investment decision based on criteria, the DEIS assumed that the affordable housing units generated from payment would be distributed proportionally to each urban village's share of residential growth. These best available assumptions were used to arrive at an estimation for planning purposes about where the affordable units generated by MHA in the action alternatives could be located.

An action alternative that considered varying the geographic distribution of MHA affordable housing payment units was considered but not included in detailed analysis. Discussion can be found in Section 2.4.

IMPACTS TO PUBLIC SCHOOLS

There is a lack of coordinated planning with Seattle Public Schools and analysis of impacts on Seattle Public Schools is not sufficient.

The Draft EIS analyzed impacts on Seattle Public Schools (SPS) generally, as required by SEPA Rules for programmatic proposals (WAC 197-11-442(3)), which allow non-project proposals, such as the MHA proposal, to be evaluated broadly. The nature of the programmatic MHA proposal presents an implementation timeframe of 20 years while SPS typically plans their projections in 5 year cycles. In the Draft EIS, each sector and respective urban village within the study area was identified and considered at a programmatic level within the limits of a feasible timeline. The SPS 2012 Facilities Master Plan was used to identify enrollment projections through 2022 as well as existing capital programs that are in place. Impacts and mitigation were identified based on readily available information and past SPS planning efforts to address capacity and enrollment issues.

Programmatic proposals can include a focus on areas of specific concern (WAC 197-11-442(4)). In the instance of public schools, this includes issues of capacity and enrollment. While the information presented in the MHA Draft EIS is both accurate and relevant, anticipatory data through coordination with SPS has assisted in analyzing impacts and mitigation more precisely. Further information needs were identified and close coordination with SPS provided a more defined analysis of enrollment, capacity estimates and the SPS planning cycle. The Final EIS expands on the Draft EIS analysis to include an examination of projected housing

growth as a result of the MHA proposal, the estimated student generation as a result of the MHA proposal, the challenges that SPS encounters with capacity exceedance, and potential mitigation measures to address these challenges within the context of the SPS planning cycle. Discussion of additional mitigation measures is also added in the FEIS.

IMPACTS TO HISTORIC RESOURCES

Analysis of historic resources is not adequate or specific enough to local areas.

As a Programmatic EIS, the analysis of historic resources is addressed at a high level to provide a general understanding of the City's history and the potential for impacts to historic resources throughout the study area. Each neighborhood in the study area has its own unique history and associated historic resources. It is not possible to provide a detailed history of each neighborhood within the citywide study area in a programmatic EIS of this scale. In addition to the fact that a more general level of detail is appropriate for a programmatic EIS, much of the information that would be required to provide a site-specific analysis is not available.

The Programmatic EIS relies upon existing neighborhood-specific historic contexts and references these to provide information about the history of the study area, where already available. The Draft EIS discloses that not all of the existing properties within the study area have been inventoried nor have historic context statements been prepared for all the urban villages. DEIS Exhibit 3.5-5 lists all the urban villages in the study area and identifies which have been inventoried and which have had historic context statements prepared.

While all urban villages contain resources that meet the minimum age threshold for consideration as a landmark (25 years) or for listing in the National Register of Historic Places (50 years), Seattle's earliest urban villages are likely to contain a higher number of older resources. Beyond age, all of the urban villages may contain resources that are associated with marginalized or underrepresented immigrant communities. These associations often contribute to a resource's potential historic eligibility. Some urban villages in the study area have a higher likelihood for containing these types of resources, such as (but not limited to) the 23rd & Union-Jackson and Columbia City areas. Other areas, such as Licton Springs, have associations with the Duwamish people. Additionally, subsurface archaeological resources associated with Native American tribes and the history of Seattle exist throughout the study area and it

is likely that additional archaeological resources exist that have not yet been identified. To address this, a new mitigation measure in the Final EIS is that the City consider potential impacts to resources that may have these associations when reviewing projects.

As a Programmatic EIS, it is impossible to predict where redevelopment will occur. Demolition of historic buildings could occur under all Alternatives; however, identification and evaluation of potential historic resources and potential historic districts would still occur at the project-level under applicable existing City permitting requirements and design review thresholds. As a Programmatic EIS, site-specific analysis is not required by SEPA (WAC 197-11-442).

Potential impacts to each urban village are analyzed in Section 3.5 with regard to the potential growth rates under each alternative. Urban villages with high growth rates were identified as areas where there is higher potential for impact to the overall historic fabric of the urban village. Proposed rezoning changes were also analyzed for potential impacts to historic resources due to the potential for changes in scale. Analysis of the potential impacts to scale is also provided in Section 3.3 (Aesthetics), and Section 3.2 (Land Use).

Under all Alternatives, identification and evaluation of potential historic resources and potential historic districts would still occur at the project-level under applicable existing City permitting requirements and design review thresholds. Under all Alternatives, existing local and national historic districts would be excluded from proposed zoning changes and MHA requirements. Potential future impacts to newly-created historic districts would be considered at an individual basis at the time of designation.

The Draft EIS discloses that there are Unreinforced Masonry (URM) buildings throughout the study area and that this is a common building type. URM buildings are often eligible for listing in a historic register and contribute the historic character of neighborhoods. The City maintains a list of URM buildings that is updated quarterly and field verified.

Through the URM Policy Committee, the City is considering adopting a policy that would require seismic upgrades to URM buildings. The Policy Committee submitted its final recommendations to the City on August 3, 2017. To date, the policy has not been adopted. The Policy Committee recommends excluding requirements for buildings that have brick veneer, concrete masonry, and are single-family and two-unit residences (see Unreinforced Masonry Policy Committee, July 25, 2017,

available at http://www.seattle.gov/dpd/cs/groups/pan/@pan/documents/web_informational/p3452259.pdf).

Because the Alternatives are proposing zoning and policy changes, none of the Alternatives would result in direct impacts to historic or cultural resources. Direct impacts have the potential to occur at a project-level, which would be subject to existing project-level review under applicable existing City permitting requirements and design review thresholds.

The mitigation measures proposed in the Draft and Final EIS could reduce potential impacts to historic resources through lowering the thresholds for project-level historic resources review, creating additional historic context statements and proactively nominating resources for landmark review, and prioritize funds for seismic retrofitting of unreinforced masonry buildings that meet eligibility requirements. Additional mitigation measures are included in the Final EIS.

IMPACTS TO TREE CANOPY

There will be a loss of tree canopy due to the proposal, impacts on tree canopy are underestimated.

As a Programmatic EIS, the analysis of tree canopy is constructed to provide a general understanding of the potential for tree canopy loss or gain under each alternative. The method and assumptions for the tree canopy analysis are provided in Section 3.6 Biological Resources, at DEIS page 3.260. Changes in canopy coverage are expected even under the No Action alternative, but would be a result of current zoning and tree protection policies, codes and development standards. The most recent, 2016 LiDAR data are the primary source for analysis of tree canopy coverage. Changes in tree canopy coverage over time include tree losses due to development as well as tree maturation and planting.

As identified in the Draft EIS, an incremental loss of tree canopy of 0.5 percent or less is estimated for the action alternatives. Due to the small increment, and the anticipated implementation of mitigation measures including options the city is currently exploring, the potential impacts to tree canopy are not expected to be significant. Mitigation measures are discussed in greater detail in the FEIS, and include steps outlined in the recently issued executive order. Several specific code changes are added in the FEIS as an integrated part of the proposal to enhance tree protections. These include modification to green factor requirements to give greater weight to tree preservation, incentives in design review for tree preservation, and a new tree planting requirement in the Residential

Small Lot (RSL) zone. Anticipated mitigation measures could have the intended effect of increasing tree canopy citywide towards the city's stated 30 percent goal over the planning horizon.

PARKING IMPACTS AND MITIGATIONS

Impacts to on-street parking are not adequately addressed and the identified mitigation for on-street parking impacts will not be effective.

The DEIS acknowledges a parking deficiency under the No Action Alternative and significant adverse impacts under Alternatives 2 and 3. The threshold for a significant parking impact is defined as parking demand exceeding supply. To mitigate those impacts the DEIS proposes a variety of mitigation measures.

For clarity, in the Final EIS the "Travel Demand Management and Parking Strategies" mitigation section is divided into two separate sections:

- **Travel Demand Management:** these strategies would encourage non-auto travel reducing the likelihood that people will own a car and thus indirectly mitigating the on-street parking impact by reducing overall on-street parking demand.
- **On-Street Parking Management:** these strategies would directly address on-street parking impacts through pricing, restricted parking zones and other means.

This is a programmatic EIS that addresses area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects that will be required are also unknown. Individual development projects will undergo separate and more detailed SEPA review during which specific impacts and mitigation (including on-street parking) will be determined. Seattle Municipal Code 25.05.675.M.2.b expressly exempts on-street parking impact mitigation for new residential development within "portions of urban villages within 1,320 feet of a street with frequent transit service." This exception covers much of the area affected by the MHA proposal. Any areas not covered by that provision would be subject to mitigation during the project review.

Although City policy does not require mitigation for high on-street parking demand in urban villages near frequent transit, the City has three programs to manage parking demand:

- **Performance-Based Parking Program:** paid parking area expansions and price adjustments are routinely considered as part of the City's ongoing program.
- **Restricted Parking Zone (RPZ) program:** RPZ revisions could include splitting existing RPZs into multiple zones, adding new RPZs, adjusting RPZ boundaries, and revising policies in areas that are oversubscribed, for example limiting the number of permits issued. Details of how changes in permit allocation would be implemented would be determined by SDOT.
- **Community Access and Parking Program:** SDOT works with community members to identify challenges and opportunities and implement changes. Parking recommendations could include new time-limit signs, load zones, paid parking, restricted parking zones, bicycle parking, or other changes.

FAMILY-FRIENDLY HOUSING

Concern that the proposed action will not create family sized housing units, or affordable family sized housing units. The impacts on supply of family-sized housing are not adequately analyzed.

Section 3.1.2 Impacts discusses impacts on the housing supply, including analysis of how the types of housing likely to be produced under the alternatives would be likely to meet the needs of families with children and larger households. Housing types in the Lowrise and Residential Small Lot zones are more likely to be ground-related units, such as townhouses, rowhouses, duplexes and small single family structures, all of which are conducive to larger households. DEIS Exhibit (3.1-33 and 3.1-34) analyzes the capacity for housing growth in the RSL and Lowrise zones, compared to Midrise & Highrise residential zones and Commercial / Mixed-Use zones that are more likely to produce smaller unit studio and one-bedroom housing units.

Description and visual models of housing types that would be produced in proposed zones including the RSL zone are in Appendix F. (See page 16 MHA Urban Design and Neighborhood Character Study). As noted, the RSL zone is expected to encourage modestly sized single family ownership homes (i.e. 1,500–2,000 sq. ft.) and expand access for more people to live in single family neighborhoods. Quantities of zoned land in the RSL zone under the action alternatives is found in Appendix H, exhibits H-1 and H-2. Additionally, a new development standard in the MHA LR1 zone is part of the proposal to encourage family sized

housing. A minimum number of family-sized housing units would be required in this zone. (See Appendix H).

Regarding rent and income-restricted family-sized housing units, the City's Office of Housing makes investment decisions for how MHA funds generated from payment will be made. Office of Housing makes investment decisions based on criteria including a priority to direct funding to vulnerable populations that may include low-income families. In the past, OH funding awards have been made to fund development projects consisting of family-sized housing.

PUBLIC LANDS FOR AFFORDABLE HOUSING

The City should make use of surplus public land to provide affordable housing. This approach should be an alternative to MHA.

Although the reuse of public lands to provide affordable housing is a strategy that is actively being pursued by the City and other government agencies, it would not meet the definition of the proposal or its objectives. Discussion of other strategies to provide affordable housing aside from MHA is provided in Section 2.2 Planning Context.

Examples of recent efforts by local government to make public lands available for affordable housing include the reuse of the former Fire Station 39 in the Lake City neighborhood for family-sized low-income housing, which is currently under construction. Former City-owned property at Yakima Ave. S. in the Judkins Park neighborhood will be awarded in 2018 to a non-profit housing provider to construct permanently affordable homeownership homes. Reuse of property owned by King County Metro adjacent to the future Northgate Light Rail station will include dedicated low-income housing. These and other efforts will continue, and are additional to the stated objectives of the proposal.

Please also note there are limitations to the impact reuse of public lands can have towards creation of affordable housing. Even in cases where land can be provided free of charge to a builder, the costs to construct and operate affordable housing are significant and require funding sources. Additionally, there are statutory limitations on the reuse of certain lands. For example, public utilities must receive fair market value when properties are disposed of for lands they own.

SINGLE FAMILY ZONES OUTSIDE OF THE STUDY AREA

Single Family zones throughout Seattle should be rezoned to allow a greater variety of housing, and have affordable housing requirements.

The proposed action and study area are described in Section 2.1. The proposed policy for MHA implementation is to make zoning capacity increases to implement MHA in areas that are already zoned for commercial or multi-family development, all areas within existing urban villages, and in urban village expansion areas studied as part of the Seattle 2035 planning process. These places were determined through policy deliberation, and growth planning consistent with the Seattle 2035 plan, to be the most appropriate locations for development capacity increases to implement MHA.

For single family zoned areas outside of urban villages, the Seattle 2035 Comprehensive Plan includes policies that generally support the preservation of single family land use. The Single Family designation on the future land use map for these lands would render changes of zoning to other uses (i.e. multifamily residential) as inconsistent with the Comprehensive Plan. Additionally, the proposed action would achieve objectives, including the objective for amount of new affordable housing, without MHA implementation in single family areas outside of the study area.

As part of separate actions or future actions, strategies to explore how housing that is more affordable, and strategies to encourage a greater variety of housing types, could be achieved in Single Family areas outside of the study area. Analysis of these separate strategies would depend on priorities established by decision-makers including the mayor and City Council.

IMPACTS TO SANITARY SEWER SYSTEMS

There will be impacts to sanitary sewer systems due to the proposal.

Impacts to sanitary sewer systems within the study area were discussed and identified in the MHA Draft EIS, Section 3.8, Public Services and Utilities. As discussed, there would be no direct impacts to public services and utilities due to MHA implementation. Indirectly, future

development under MHA would likely result in an increase in population and potentially a greater demand on local sewer systems.

As identified in the Draft EIS, future demand on sewer systems would be addressed through existing Seattle Public Utilities (SPU) practices that ensure development is not endorsed without identification of demand and availability of utilities and addressing capacity issues where they occur prior to development. These measures are currently in place and compliance is required prior to permit issuance.

Capacity of sewer systems was considered at a programmatic level per SEPA Rules (WAC 197-11-442). MHA would be implemented over a 20-year planning period. Prior to implementation, developers would be required to demonstrate sufficient capacity for the proposed flow. The Programmatic EIS is not required to consider individual sewer systems or treatment plants at this level of analysis. Impacts to individual treatment plants, including the West Point Treatment Facility, would be considered at the project-level as development occurs.

NATURAL PARKS LANDS POLICIES

I oppose any policy or use changes for natural park lands—specifically the 2,500 acres in the Green Seattle Partnership restoration process.

The proposed action to implement MHA does not include any policy changes related to the use of natural park lands. Section 3.7 discusses potential impacts of the proposed action on parks and open space. Section 3.7.3 describes mitigation measures. None of the identified mitigation measures call for policy or use changes for natural park lands.

COMMUNITY ENGAGEMENT

There has not been enough community engagement on the proposed action.

The City has informed and engaged the community through an extensive outreach program about MHA over a multi-year period. Involvement has occurred both independent and in coordination with the SEPA environmental review process. Engagement included in-person and online community input, including more than 180 meetings in a variety of formats and locations.

The MHA community engagement program is summarized in DEIS Section 2.2 (page 2.13), and more fully in Appendix B Summary of Community Input. Community engagement activities included:

- Translation of key informational materials to six languages: Chinese, Somali, Korean, Spanish, Tagalog, and Vietnamese
- More than 180 community engagement meetings, including citywide public open houses, in-depth community design workshops, and neighborhood meet-ups
- Information mailing sent to more than 88,800 urban village residents
- Door-to-door canvassing to more than 10,000 households in urban villages
- Regular newsletter updates to more than 4,200 recipients
- Ongoing online dialogue with more than 1,100 registered users (hala.consider.it)
- Reddit Ask-Me-Anything (AMA) events with more than 600 comments
- Website with more than 5,000 monthly page views
- Telephone Townhalls that reached more than 70,000 Seattle households
- Nine-month community focus group process that included over 600 volunteer hours from community members
- Hundreds of questions answered on the HALA hotline (206) 743-6612 and halainfo@seattle.gov

For the purposes of environmental review under SEPA, pursuant to City regulations, the City issued a combined Determination of Significance (DS) and scoping notice on July 28, 2016. The scoping public comment period extended to September 9, 2016, and included two opportunities for in-person EIS scoping comments on August 13, 2016, and August 27, 2016. The City published and issued the Draft EIS on June 8, 2017, with a comment period that was extended to 60 days. A DEIS open house and public hearing was held on June 29, 2017.

DISPLACEMENT ANALYSIS

Concern that the proposed action will result in a greater number of displaced households than estimated. The impacts of potential household displacement are not adequately analyzed.

As described on page 3.29 of the DEIS, displacement refers to a process wherein households are compelled to move from their homes involuntarily due to the termination of their lease, rising housing costs,

or another factor. While there is ample evidence that displacement is occurring in Seattle, many forms of displacement are impossible to measure directly with available data. Pages 3.29 through 3.44 of the DEIS present analysis of the best available data in order to summarize historic instances of displacement that can be measured throughout the study area. The findings of this analysis are then used as assumptions to help quantify differences in potential displacement impacts between the three alternatives, as presented on DEIS pages 3.52 through 3.61. This discussion of displacement acknowledges limitations in our ability to fully and accurately predict future displacement impacts due to challenges associated with measuring displacement as well as uncertainty regarding where redevelopment will occur during the next 20 years. These limitations apply to all three alternatives.

As noted on page 3.30 of the DEIS, Tenant Relocation Assistance Ordinance (TRAO) records are the best available source of data about physical displacement of households due to the demolition and redevelopment of rental properties, despite known limitations. Discussion of those limitation is provided in the footnote on DEIS page 3.30 as well as the text on DEIS page 3.33. The DEIS uses these records to estimate the historic percentage of all demolitions that resulted in the physical displacement of a low-income household, as discussed on pages 3.55 through 3.57. These percentages are used to provide an estimate of the physical displacement of low income households due to demolition activity that may be expected under each alternative. While these impacts are likely to be underestimated due to limitations in the TRAO data, the degree of underestimation would apply equally to all three alternatives. Therefore, the quantification of displacement impacts is useful for comparing the relative impacts of the three alternatives.

Additional analysis is presented in the DEIS to put these physical displacement estimates into context. DEIS Exhibit 3.1-41 presents estimates of cumulative low income households displaced due to demolition, renovation, or change of use, including displacements due to demolitions already permitted. DEIS Exhibit 3.1-38 presents estimates of the total number of demolished units in each alternative. Since many demolished homes were owner-occupied before demolition, it is not expected that every demolished unit would result in the involuntary displacement of a household at any income level. Nonetheless, these estimates of total demolished units by alternative provide an upper bound for comparing the potential physical displacement impacts of each alternative.

Due to Seattle's rapidly rising housing costs, economic displacement is likely to be an even greater problem than physical displacement. However economic displacement is an even more difficult phenomenon to measure directly. An indirect quantitative assessment of potential economic displacement of low income households in neighborhoods across Seattle is presented on DEIS pages 3.33 through 3.42. However too much uncertainty exists to reliably quantify economic displacement impacts looking forward. Therefore, the DEIS evaluates the potential economic and cultural displacement impacts of alternatives qualitatively, with reference to both historic trends as well as anticipated impacts of the alternatives on housing affordability and the availability of income-restricted subsidized housing.

STORMWATER INFRASTRUCTURE

There will be impacts to stormwater drainage systems due to the proposal.

Impacts to stormwater drainage systems in the study area were discussed and identified in the MHA Draft EIS, Section 3.8, Public Services and Utilities. Future development under the MHA program would likely result in an increase in population and potentially a greater demand on local stormwater drainage systems.

Capacity of stormwater drainage systems was considered at a programmatic level per SEPA Rules (WAC 197-11-442); MHA would be implemented over a 20-year planning period. Prior to implementation, developers would be required to demonstrate compliance with the Seattle Stormwater Code, even where drainage control review is not required. These measures are currently in place and compliance is required prior to permit issuance.

Some development is required to improve stormwater drainage systems where formal drainage systems are not in place. The DEIS notes that smaller development may not be required to improve drainage systems, and where these developments occur in areas of informal drainage an impact could result. The DEIS discusses urban villages with large amounts of informal drainage in the discussion of impacts to drainage systems.

The Programmatic EIS is not required to consider individual drainage systems improvements at this level of analysis. Impacts to drainage from individual developments would be considered at the project-level as development occurs. Mitigation measures are identified, which could at least partly mitigate potential impact in areas of informal drainage.

CUMULATIVE IMPACTS

The EIS did not consider cumulative impacts, including the impacts of this proposed action and other pending actions.

EIS subsection 2.2 Planning Context summarizes how the proposal relates to other relevant plans and policies including the Seattle 2035 Comprehensive Plan. This is a programmatic level EIS per SEPA Rules so impacts are discussed at a general level. To evaluate impacts of MHA implementation over a 20-year planning period action alternatives are compared to a no action scenario of 20-year planned growth anticipated in the Comprehensive Plan.

Where information is known about other potentially related proposals or actions the information is incorporated into analysis. Examples include consideration of MHA implementation through other separate planning processes including for the Downtown/South Lake Union, Uptown and University District areas. Other examples of where related proposals are considered in analysis include discussion of changes to the city's design review program, transportation modelling to reflect the buildout of Sound Transit 3 systems improvements, and a recent executive order for enhancing tree protections. In particular, all growth-related plans and programs are considered, and many of these are within the bounds of actions that are addressed in the Seattle 2035 Comprehensive Plan. Major capitol projects that could intersect with the analysis are also considered. All such projects would also be subject to SEPA in subsequent phases of review.

4.3 RESPONSES TO E-MAIL, ONLINE COMMENT FORM, AND HARD COPY LETTER COMMENTS

Exhibit 4–3 Commenters Providing Comments by E-Mail, Online Comment Form, or Hard Copy Letter

Last Name	First Name	Organization
Abelson	Vernon	
Adams	Scott	
Alado	Lisa	
AlFaiz	Amal	Madison Park Community
Alger	Ryan	
Allegro	Craig	
Allen	Demi	
Andersen	Eric	
Anderson	Kim	
Anonymous-01		
Anonymous-02		
Anonymous-03		
Anonymous-04		
Anonymous-05		
Anonymous-06		
Anonymous-09		
Anonymous-10		
Anonymous-11		
Anonymous-12		
Anonymous-13		
Anonymous-14		
Anonymous-15		
Anonymous-17		
Anonymous-18		
Anonymous-19		
Anonymous-20		
Anonymous-21		
Anonymous-22		
Anonymous-23		
Anonymous-24		
Anonymous-25		

Exhibit 4–3 Commenters Providing Comments by E-Mail, Online
Comment Form, or Hard Copy Letter (cont.)

Last Name	First Name	Organization
Anonymous-26		
Anonymous-27		
Anonymous-28		
Anonymous-30		
Anonymous-31		
Anonymous-32		
Anonymous-33		
Anonymous-34		
Anonymous-35		
Anonymous-36		
Anonymous-37		
Anonymous-38		
Anonymous-39		
Anonymous-40		
Anonymous-41		
Anonymous-42		
Anonymous-43		
Anonymous-44		
Anonymous-45		
Anonymous-46		
Anonymous-47		
Anonymous-48		
Anonymous-49		
Antipas	Artemis	
Appleman	Ira	Eastlake Fair Growth
Arnett	Bill	
Avnery	Ofer	
Ayres	Dara	
Bach	Claudia	
Bader	Judith	
Bailey	Shannon	
Baker	Jack	
Baldner	Dan	
Barber	Jason	
Barker	Deb	Morgan Junction Community Association
Barnett	Bruce	

Exhibit 4–3 Commenters Providing Comments by E-Mail, Online Comment Form, or Hard Copy Letter (cont.)

Last Name	First Name	Organization
Barney	Sybil	
Barrer	Carole	
Bates	Tawny	
Beams	Greg	Photographic Center Northwest
Beetem	Jennifer	
Ben		
Bendich	Judy	
Benedick	Carol	Congregation Beth Shalom
Bennett	VernonC	
Benson	Max	
Berger	Dan	
Berner	Miranda	
Bertolet	Dan	Sightline Institute
Best	Brooke	
Bevis	Carl	
Blacksher	Erika	
Bliquez	Larry	
Bliquez	Pat	
Bocek	Nancy	Livable U District Coalition
Bondra	MichaelJ	
Boothby	Mimi	
Borwick	Charles	
Bosch	Amy	
Boyd	Dianne	
Boyd	Sugiki	
Boyer	Cynthia	
Braybrooks	Julie	
Bree	Jackie	
Brennan	Alex	Capitol Hill Renters Initiative
Bricklin	David	Madison-Miller neighbors
Brooks	Kyle	
Brothers	Cynthia	
Brown	Scott	3200 Block of NW Market St
Browning	Chris	
Browning	Liz	
Bubelis	Walt	

Exhibit 4–3 Commenters Providing Comments by E-Mail, Online
Comment Form, or Hard Copy Letter (cont.)

Last Name	First Name	Organization
Buckley	Christopher	
Bucy	Katie	
Burco	Greta	
Burke	Susan	
Burnstein	Daniel	
Bush	Rhonda	
Cain	Julie	
Campbell	Elizabeth	
Capitol Hill Happy Dog		
Carson	Mel	
Casey	Tanya	
Cave	Donn	
Celeste		
Cerceo	Mike	
Chan	Sabina	
Chapman	Paul	Welcoming Wallingford
Charlotte		
Cherberg	Mark	
Chesko	James	
Christian	Brent	
Christian	Katharine	
Christie	David	
Chu	Brian	Yesler Community Collaborative
Clark	Bill	
Clark	Josie	
Clark	Karen	
Clark	Kevin	
Clifton	Linda	
Cochran	Phil	
Cocking	Penni	Duwamish Valley Neighborhood Preservation Coalition and South Park Land Use Committee
Commons	Rene	
Compton	Angela	
Condon	Ann	
Coon	Lisa	
Cooper	Scott	

Exhibit 4–3 Commenters Providing Comments by E-Mail, Online Comment Form, or Hard Copy Letter (cont.)

Last Name	First Name	Organization
Cope	Marilyn	
Corcoran	Sue	
Coulter	Brad	
Coulter	Sara	
Currier	Shane	
Cuthbertson	MacEwan	
Cvitkovic	Mike	
Dahn	Denise	
Dal Porto	Danna	
Davis	Jean	
Davis	Renee	
Deeter	Derek	
de la Cruz	Aida	
deLancey	Kristin	
De Mocko	JM	
Denney	Meyer	
Denny	Sigrun	
DeWilde	Lisa K.	South Park neighborhood
Dey	Michael	Fauntleroy Community Association
DiLeva	Mary Pat	
Dimbirs	Andrejs	
Dimbirs	Shirley	
DiRaimo	Ryan	Aurora Licton Urban Village
Ditty	Sarah	
Dlugosch	Deborah	
Dooley	Stephen	
Dougherty	Jason	
Driver	Nancy	
Dubrulle	Jeff	
Duff	Alice	
Dunn	Kimberly	
Dunn	Pamela	
Dunn Marsh	Michelle	Photographic Center Northwest
Earl	Karen	
Early	Tom	Seattle Urban Forestry Commission
Eaton	Malaika	

Exhibit 4–3 Commenters Providing Comments by E-Mail, Online
Comment Form, or Hard Copy Letter (cont.)

Last Name	First Name	Organization
Ecord	Bruce	
Efthimiadis	Nicholas	
Ellis-Bevil	Michelle	
England	Kim	
Fanucchi	Chuck	
Fay	Frank	
Fenner	Phil	
Field	Julia	
Filer	Curran	
Finlayson	Patricia	
Fitzgibbons	Dawn	Baker Street Community Group
Flood	Greg	
Foltz	Mark	
Foltz	MarkA	
Fowler	Ruby	
Fox	John	
Freistadt	Jay	
Freitas	Kevin	
Frum	RDavid	
Fuhr	Richard	
Fuller	Joe	
Fulton	JR	
Geenen	Hugh	
Gelb	Jacob	Bellwether Housing
Gellert	Nicholas	
Gensler	Ann	
Gibb	Janet	
Gilman	Mary Jean	
Gilmore	Matt	
Goetz	Kristina	
Goldenberg	Eldan	
Goldman	Michael	
Gonzales	Ruel	
Goodman	Jeremy	
Goodwin	Amanda	
Goplen	Susan	

Exhibit 4–3 Commenters Providing Comments by E-Mail, Online Comment Form, or Hard Copy Letter (cont.)

Last Name	First Name	Organization
Graves	David	
Green	Rahsaan	
Greene	Will	
Griffen	Penny	
Griffith	Greg	Department of Archaeology and Historic Preservation
Griswold	Mark	
Gruber	Nancy	
Guess	Carl	
Hacker	Tony	
Hale	Ashly	Laurelhurst Community Club
Hale	Jeannie	
Hall	Cameron	
Hall	Charles	Capitol Hill Housing
Hall	Steve	Friends of Historic Seattle
Hammock	Jeannie	Pecos Pit Bar-B-Que
Hannah		
Hannum	PMark	
Hardy	Karen	
Harrison	Rob	
Harwell	Kirk	
Hattendorf	Ramona	
Haury	Paul	
Hayward	Lisa	
Heavey	Anne	
Heller	Geoffrey	
Herbold	Lisa	
Herman	Brandon	
Herzog	Laura	
Hill	Gregory	
Holderman	William	Photographic Center Northwest
Holliday	Catherine	Madison Miller Park Community
Holliday	Guy	
House	Erin	Seattle for Everyone
Hudson	Ron	
Hurd	Caroline	
Jacobs	Lyn	

Exhibit 4–3 Commenters Providing Comments by E-Mail, Online
Comment Form, or Hard Copy Letter (cont.)

Last Name	First Name	Organization
James	Jules	
Janet		
Jarrett	Justin	
Jasmine		
Jeffers	Chad	
Jenn		
JoHanson	Mark	
Johnson	Iskra	
Johnson	Jeff	
Johnson	Lani	
Johnson	Lewis	
Johnson	Rob	
Johnson	Trish	
Jones	Anita	
Jones	Scott	
Jones	Michael	
JR		
Kaku	Katie	
Kapsner	Jeff	
Kato	Marcia	
Katy		
Katz	Andrew	
Katz	Mitch	
Kaylor	Courtney	
Keller	Eve	
Keller	Kathryn	
Kelly	Kathleen	
Kemna	Mariska	
Kendahl		
Kendall	Katie	
Kenison	Rebecca	
Kennell	Marilyn	
Ketcherside	Rob	Capitol Hill Historical Society
King	Gretchen	
King	Stephanie	
Kirsch	Andrew	

Exhibit 4–3 Commenters Providing Comments by E-Mail, Online Comment Form, or Hard Copy Letter (cont.)

Last Name	First Name	Organization
Kirschner	Bryan	
Kischner	Gerrit	Genessee Hill Elementary
Kissman	Ellen	Yesler Community Collaborative
Klatte	Phillip	
Knight	Dave	
Knudsen	Constance	
Koehler	Chris	
Koehler	Rich	
Kofmehl	Andri	
Kombol	Todd	
Kraft	Sam	
Kreuger	Andrew	
Krom	Georgi	
Krombein	Jon	
Krueger	Ingrid	Crown Hill Urban Village Committee for Smart Growth
Krueger	Ray	
Kuciej	Walter	
Kutoff	Allan	
Labadie	E	
Laban	Patrick	
Lang	Mona	
Langhans	Aileen	The Langhans Ladies
Lara	Myra	
Lasser	Suzanne	
Latoszek	Mira	Beacon Hill Council
Lau	Linda	
Lazerwitz	Jay	
LeDuc	Jeanne	SouthEast Effective Development (SEED)
Leis	Jenny	
Lettunich	Mike	
Lewis	Maggie	
Lew Tsai-Le Whitson	Rose	
Leykam	Robert	Photographic Center Northwest
Lidman	Monika	
Likins	Jessica	

Exhibit 4–3 Commenters Providing Comments by E-Mail, Online
Comment Form, or Hard Copy Letter (cont.)

Last Name	First Name	Organization
Lin	IHsuan	
Linda		
Liora		
Lipke	Terence	
Lloyd	Katy	
Loeppky	Steve	
Look	Ellen	
Lowe	Anne-Marie	
Luetjen	Douglas	Friends of Dakota Place Park
Luhman	Dale	
Luong	Dan	
MacDonald	Glenn	
Madden	Heidi	
Malagon	Mauricio	
Maloney	Sue	
Marjan		
Martensen	Terri	
Martin	Carly	
Martin	Sandra	
Martin	Sandy	
Mason	Marilyn	Photographic Center Northwest
Masonis	Robert	
Mauger	Guillaume	
Maund	Joyce	
McAleer	Bill	
McAlpine	John	
McCarthy	Ryan	
McCleery	Julie	
McCulloch	Garrett	
McCullough	Jack	Coalition for Housing Solutions
McCullough	MaryKae	
McCumber	Mary	
McMillen	Roger	
McRory	Amy	
Medina	Rosario	
Melissa		

Exhibit 4–3 Commenters Providing Comments by E-Mail, Online
Comment Form, or Hard Copy Letter (cont.)

Last Name	First Name	Organization
Mermelstein	Jon	
Mikkelsen	Susan	
Miles	Don	
Miller	Karin	
Mirra	Nicholas	
Misha		
Mittell	Mary	
Moehring	David	
Mohler	Rick	
Momoda	Ron	
Morris	Stephanie	
Morrison	Ian	
Morrow	Michael	
Motzer	Tim	
Moyer	Erin	
Mueller	Melinda	
Muller	Michael	
Murakami	ER	
Murdock	Vanessa	
Neeson	Edie	
Neighbor		
Nelson	Shirley	
Nesoff	Tema	
Newell	Mark	
Newland	Sophie	
Nichols	Liz	
Nicholson	Bradley	
Nickel	Dick	
Nielsen	Steve	
Nighthawk		
Nikolaus	Sheena	
Noah	Barbara	
Noble	JudithAndTom	
Noble	Thomas	
Nolan	Trenton	
Nonneman	Elaine	Madison-Miller Park Community

Exhibit 4–3 Commenters Providing Comments by E-Mail, Online
Comment Form, or Hard Copy Letter (cont.)

Last Name	First Name	Organization
Nourish	Bruce	Backyard Cottage Blog
Novak	Terry	Photographic Center Northwest
O'Brien	Cindy	
Oei	Holly	
Okuno	Erin	
O'Leary	Dennis	
O'Leary	Roberta	
Olins	Alexandra	
Olivas	Alizah	
Olson	John	
Olson	Leanne	
Osaki	Maryanne	
Parker	Bruce	
Parks	Kristan	Photographic Center Northwest
Parrish	Rebecca	
Pasciuto	Giulia	Puget Sound Sage
Perce	Celeste	
Peters	Brook	
Peters	Kay	
Peterson	Kyle	
Peterson	Shawn	
Pihl	Eric	
Pittinger	Glenn	
Plomp	Marjolijn	
Pollet	Gerry	
Prasad	Veena	
Pratt	CW	
Presser	Brian	
Prociv	Patrick	
Proteau	Dwight	
Provost	Nicole	
Pullen	Jonathan	
Quaintance	Alice	
Quetin	Gregory	
R	Randy	
Raaen	Lee	Wallingford Community Council

Exhibit 4–3 Commenters Providing Comments by E-Mail, Online
Comment Form, or Hard Copy Letter (cont.)

Last Name	First Name	Organization
Rainier Beach Action Coalition		Rainier Beach Action Coalition
Rakic	Helen	
Rasmussen	Hans	
Reed	Trevor	
Rees	Janine	
Reigart	John	
Reilly	Wendy	
Renick	Julie	
Rhodes	Susan	
Rich	Samantha	
Riebe	Edgar	
Roberto	Michael	
Robertson	Kiran	
Rodak	Ann	
Rodriguez-Lawson	Roberto	
Rosenberg	Doug	
RoseRyan	Jenny	Westwood Roxhill Arbor Heights Community Coalition
Ross	Jenn	
Rostosky	Jay	
Roth	Susan	
Roxby	Alison	
Ruby	Mike	
Rulifson	Brian	
Sabersky	Sandy	
Saganic	Erik	Puget Sound Clean Air Agency
Sampson	Bill	
Sandler	Nora	
Sang	Andrew	
Saunders	Laura	
Sawyer	Amanda	
Scarlett	Jennifer	
Schauer	Bruce	
Scherer	SharonV	
Schletty	Mark	
Schugurensky	Pablo	
Schweinberger	Sylvia	

Exhibit 4–3 Commenters Providing Comments by E-Mail, Online
Comment Form, or Hard Copy Letter (cont.)

Last Name	First Name	Organization
Scott	Gunner	Highland Park Action Committee HPAC
Seffernick	Ashley	
Sellers	Matt	
Selznick	Ann	
Sewell	Linda	
Sherman	Kim	
Shifley	Sarah	
Shifley	Sarah and Hedlund, Tyrell	
Showalter	Whitney	
Siegfriedt	Sarajane	
Sievers	Ron	
Silverman	Jeff	
Simons	Lucas	
Singer	Glen	
Skurdal	Aric	
Smilanich	Tamra	
Smith	Gerry	
Smith	Randy	
Smith-Bates	Jacqui	
Smits	Jessica	
Soper	Susan	
Spencer	Patricia	
Spengler	Dan	
Spengler	Tamsen	
Spotswood	Marilyn	
Stacy		
Standish	Dana	
Stark	Korina	
Steiner	Brad	
Stelling	Deanna	
Stelling	Tim	
Stewart	John	
Stoker	Melissa	
Stone	Stephanie	
Sullivan	Megan	

Exhibit 4–3 Commenters Providing Comments by E-Mail, Online Comment Form, or Hard Copy Letter (cont.)

Last Name	First Name	Organization
Sunidja	Aditya	
Sureddin	Paul	
Szabo	Tyler	
Taylor	Patrick	
Terjeson	Shawn	
Terjeson	Susan	
Thaler	Toby	
Thomas	Rutha	
Thompson	Gayle	
Thomson	John	
Thon	Wendy	
Thoreen	Kari	
Tobin-Presser	Christy	West Seattle JuNO Land Use Committee
Tran	Dan	
Treffers	Steven	
Trethewey	Sarah	
Tromly	Benjamin	
Trumm	Doug	
Turpin	Kate	
Tyler		
Valdez	Roger	Smart Growth Seattle
Valeske	Austin	Capitol Hill Renters Initiative
Van Woodward	Megan	
Wallace	Kevin	
Wallace	Lorrie	
Wang	Rachel	
Ward	David	
Warren	Barbara	
Waterman	Rose	
Weingarten	Tom	
West	Margaret	
Westbrook	Melissa	
Weybright	JoElla	
White	Catherine	
Williams	Amber	
Williams	Bonnie	

Exhibit 4–3 Commenters Providing Comments by E-Mail, Online
Comment Form, or Hard Copy Letter (cont.)

Last Name	First Name	Organization
Williams	Natalie	
Williams	Niki	
Williams	Ruth	
Williamson	Don	
Willis	Elise	Photographic Center Northwest
Willumson	Paul	
Wilson	Tom	
Wolf	Darryll	
Woo	Eugenia	Historic Seattle
Woo	Vickie	
Wood	Marilyn	
Woodland	Nancy	
Woodward	Janet	
Wordeman	Linda	
Wright	Barbara	
Wright	Stacy	
Yadon	Bryce	Futurewise
Zemke	Steve	Friends of Seattle's Urban Forest
Zerkowitz	Lisa	
Zugschwerdt	Nancy	

Abelson, Vernon

1. Character Structures

See discussion under subsection 3.5.1, which summarizes Seattle's historic preservation programs. A reference to Character Structures in the first paragraph is not apparent.

2. Impacts to historic and cultural resources in urban villages.

See section 3.5.2 Impacts Common to All Alternatives, for discussion of potential impacts to historic resources from demolition and redevelopment. The EIS addresses varied potential impacts to cultural resources in different urban villages in the analysis of National Register of Historic Places sites within urban villages, review of which urban villages have historic resources surveys. See also discussion of urban villages in Impacts of the Alternatives.

3. Boundaries of urban villages

See proposed urban village boundary expansion maps in Chapter 2, Urban Village Expansion Areas. See also Appendix H maps of each urban village.

4. Commercial growth

Both commercial growth and residential growth are estimated in the EIS for each alternative. See DEIS Exhibit 2-7 Residential and Commercial Growth.

5. Location of historic resources in urban villages

The term affected environment refers to the existing condition that provides a baseline for analysis of potential impacts of alternatives in the EIS. The purpose of the EIS is to provide information to decision-makers about how the proposed action could impact the environment including historic resources. It is true that urban villages were designated in the 1990's, long after the development of Seattle neighborhoods. Since potential growth pattern in the EIS alternatives vary across different urban villages, urban villages are considered as a geographic unit for evaluation potential impacts. Some designated historic districts are within urban villages and some are not. It should be noted that no changes to zoning to implement MHA are proposed for any of Seattle's designated historic districts.

6. Impacts

The proposal to implement MHA is not a direct impact because it does not directly cause any physical alteration or immediate effect on any historic resource. Future development under new zoning regulations may or may not occur on the site of a historic resource in the future. Discussion of systematic historic surveys, refers to neighborhoods in the study area, where a systematic inventory has been conducted.

Adams, Scott

1. **Seattle Public Schools and those involved with parks are not involved in planning.**

Representatives from Seattle Public Schools and the Seattle Parks and Recreation have been involved in drafting and review of the EIS. Please see frequent comment response concerning coordinated planning with Seattle Public Schools, and response to Pollet, Gerry.

2. **Proposals for Fort Lawton.**

Fort Lawton is outside of the study area for this proposal. Any potential actions related to Fort Lawton are being considered through a separate planning process with environmental review.

3. **Involve officials from parks and schools in actions that would increase density.**

See response to 1 above. The EIS evaluates potential impacts from additional growth in each of the action alternatives. Please see Section 3.7 Open Space and Recreation for discussion of how potential growth could impact Parks facilities. The evaluation reflects Seattle Parks and Recreation level of service standards, and recent planning efforts.

Alado, Lisa

1. through 4. **Commenter does not support MHA in the Green Lake neighborhood; it would negatively alter the tone of the neighborhood.**

Thank you for your comment. Comment noted.

5. through 10. **MHA would make traffic and parking worse, destroy historic resources, have a negative impact on biological resources, recreational resources, public utilities and resources, and Green Lake's micro environment.**

Thank you for your comment. Your comment was noted, but the comment was not specific enough to respond to. Please see Chapter 3.4 Transportation, Chapter 3.5 Historic Resources, Chapter 3.6 Biological Resources, Chapter 3.7 Open Space and Recreation, Chapter 3.8 Public Services and Utilities, and Chapter 3.9 Air Quality and Greenhouse Gas Emissions of the final EIS for a discussion of impacts and possible mitigation.

Al Faiz, Amal-1

1. **Supports comments and conclusions of the Madison Miller Park Community Group.**

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Al Faiz, Amal-2

1. The proposal does not address middle income earners and families.

Comments noted. Please see discussion in Section 3.1 Housing and Socioeconomics including discussion of impacts of housing supply. Please also see frequent comment response concerning family-friendly housing.

2. Concern that recent development in the Madison-Miller area will limit the effect of the proposal to achieve rent and income restricted units through MHA in the area.

Comments noted. Please see growth estimates for the urban village in Chapter 2. Please note that estimates consider pipeline development. Please also see Appendix G.

3. Concern about displacement of existing residents under the action alternatives.

Please see discussion of direct, economic and cultural displacement in Section 3.1 Housing and Socioeconomics.

4. Concern that MHA implementation will not generate housing for long term communities or families.

Comments noted. Please see frequent comment response concerning family-friendly housing. Please note that the LR1 zone as proposed under MHA implementation will include a family-sized housing requirement.

5. Do not change the zoning designation on the land zoned RSL in the Madison Miller urban village.

Comments noted. Please see Preferred Alternative at Appendix H. Please also see discussion of the approach for the Preferred Alternative in Chapter 2. It is correct that MHA is an incentive-based approach for the provision of affordable housing and an increase to zoned capacity is necessary in order to put the affordable housing requirement in place.

6. Expand areas of RSL zoning to implement MHA in Madison-Miller.

Comments noted. Please see comment response to Holliday, Guy and Bricklin, David. Please see the Preferred Alternative map at Appendix H.

Alger, Ryan

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Allegro, Craig

1. Fort Lawton

Fort Lawton is outside of the study area for this proposal. Any potential actions related to land use at Fort Lawton are being considered through a separate planning process with environmental review.

Allen, Demi

1. Housing and socioeconomic is the most important aspect of the EIS and should be expanded. Displacement is happening throughout the city, upzones should be more broadly applied.

Thank you for your comment. Comment noted.

The final EIS includes expanded analysis of impacts on racial and cultural minority groups. Please see frequent comment response "Impacts on racial and cultural minority groups."

2. Upzones may cause more physical displacement but will allow more people to stay in their chosen neighborhoods.

Thank you for your comment. Comment noted.

3. Aesthetics should not be part of the analysis – displacement is more important than individual opinions on aesthetics.

Thank you for your comment. Comment noted.

Andersen, Eric

1. **Opposes implementing MHA as a homeowner living near an urban village. Should study impacts on individual urban villages and adjoining single family neighborhoods.**

Thank you for your comment. Comment noted.

Please see frequent comment responses “Individual Urban Village Review” and “Single Family zones outside the study area.”

Anderson, Kim

1. **Concern about lack of sidewalks, parking, and mailbox access**

Please see frequent comment response concerning *Impacts to parking*. Also note that new development inside urban villages requires sidewalks in many cases. Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as Relevant Plans and Policies, which includes “New sidewalks, particularly near schools” as part of the City of Seattle 2017–2022 Transportation Capital Improvement Program.

Mailboxes are not within the scope of this study. However, nothing in the proposal impedes the City from pursuing a mailbox program.

2. **Concern about pedestrian safety relating to increases in traffic**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, Chapter 3.4 Transportation for discussion of impacts and mitigation measures, including discussion of pedestrian safety.

Anonymous comments. Where numbering is not sequential a comment form was submitted without a comment.

Anonymous 1

1. Concern about neighborhood livability

Comment noted. Many EIS chapters address aspects of neighborhood conditions and anticipated impacts of the alternatives, as well as mitigation measures. Please also see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

2. Concern about loss of existing affordable housing, micro-housing

Please see EIS Chapter 3.1 Housing and Socioeconomics as well as p. 61 of the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses and reports on MHA payment dollars used to fund acquisition and rehabilitation of existing housing.

3. Require impact fees and parking

The proposal is aimed at providing additional affordable housing so the City intends to pursue mitigation measures that will alleviate impacts while still achieving the goal of improved housing affordability. Nothing in this proposal impedes the ability of the City to pursue implementation of an impact fee program.

Please also see frequent comment response concerning *Impacts to parking*.

4. Concern about where affordable housing funded with payments will be built

Please see frequent comment response concerning *MHA affordable housing requirements* and *Location of MHA housing units*. Note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

5. Concern about traffic and school capacity

Please see frequent comment response concerning *Impacts to Seattle Public School capacity*.

Anonymous 2

1. **Where is the CID listed on Exhibit 2-4 on page 2.10 in the Alternatives section of the report?**

The Chinatown-International District area is not part of the study area for the citywide MHA EIS. This area was covered through a separate process and environmental review. MHA was implemented in the Chinatown-International District in August 2017.

Anonymous 3

1. **Parking is already a problem. Require parking with new buildings.**

Thank you for your comment. Comment noted.

Please see frequent comment response regarding Parking Impacts and Mitigation and EIS Chapter 3.4 Transportation.

Anonymous 4

1. **Request to adopt Alternative 3 in all south Seattle neighborhoods. Use RSL zoning more.**

Thank you for your comment. Comment noted. Please see EIS Chapter 2.0 Description of the Proposed Alternative.

Anonymous 5

1. **A proper range of alternatives was not considered. There is enough existing capacity. Implement MHA with no zoning changes.**

Thank you for your comment. Your comment is noted. Please see frequent comment response concerning Alternatives to MHA that could achieve objectives and MHA affordable housing requirements.

2. **Preserve single family neighborhoods.**

Thank you for your comment. Your comment is noted.

3. **Alternatives 2 and 3 destroy character of single family neighborhoods. The EIS does not summarize single family homes that will be lost.**

Thank you for your comment. Your comment is noted. Please see EIS Chapter 3.1 Housing and Socioeconomics.

Anonymous 6

1. **Preference for Alternative 3 as it provides the most housing.**

Thank you for your comment. Comment noted.

Anonymous 9

1. **DEIS is not sufficient. Each urban village is unique and should have its own environmental analysis.**

Thank you for your comment. Comment noted. Please refer to frequent comment response concerning Individual Urban Village Review.

Anonymous 10

1. **Neither of the action alternatives is acceptable. Focusing growth in urban villages is unfair.**

Thank you for your comment. Your comment is noted.

Anonymous 11

1. **Prefers the No Action Alternative. Uptown should have been included in the MHA citywide EIS.**

Thank you for your comment. Your comment is noted. Please refer to EIS Chapter 2.0 Description of the Proposal and Alternatives.

2. **Housing and Socioeconomics—Allowing developers to pay instead of building affordable units undercuts the goal of diverse neighborhoods. Concern about gentrification.**

Thank you for your comment. Your comment is noted. Please see frequent comment response concerning Location of MHA housing units and Displacement Analysis.

3. **Land Use—Uptown was reclassified without warning.**

Thank you for your comment. Your comment is noted.

The Uptown planning process has been underway since 2014 and localized community input informed the zoning proposal for this area.

4. **Aesthetics—Support for gradual transitions from tall to low buildings.**

Thank you for your comment. Your comment is noted. Please see EIS Chapter 3.3 Aesthetics and Appendix C MHA Implementation Principles.

5. **Transportation—Increased density is causing traffic problems. Rebuilding Mercer Place is imperative. Concern about infrastructure here.**

Thank you for your comment. Your comment is noted.

6. **Historic Resources—Concern about Seattle losing aspects of its history through loss of historic buildings. Recommendation to preserve facades.**

Thank you for your comment. Your comment is noted.

7. **Biological Resources—Mercer Place is part of an environmentally critical area due to steep slopes. This should be fixed.**

Thank you for your comment. Your comment is noted.

8. **Open Space & Recreation—Low-income and minority community members do not have enough parks. Parks are disproportionately distributed.**

Thank you for your comment. Your comment is noted. Please see frequent comment response concerning impacts on racial and cultural minority groups.

9. **Public Services & Utilities—Opt-out fees will allow more luxury apartments and drive housing prices higher.**

Thank you for your comment. Your comment is noted. Please see frequent comment response concerning “Location of MHA housing units”.

10. **Air Quality & Green House Gas Emissions—Increase greenery on buildings to improve air quality.**

Thank you for your comment. Your comment is noted. The citywide MHA proposal includes updates to landscaping standards for multifamily and commercial zoning.

Anonymous 12

1. **Commenter does not prefer Alternative 3.**

Thank you for your comment. Your comment is noted.

Anonymous 13

1. **Consider streetscape design requirements that include landscaping, walkways, bike paths, and more to reduce impacts of tall buildings.**

Thank you for your comment. Your comment is noted. Please see EIS Chapter 3.3 Aesthetics, including mitigation measures.

Anonymous 14

1. **Description of the Proposed Action and Alternatives—Alternatives will not accomplish goals of environment or affordability.**

Thank you for your comment. Your comment is noted. Please see frequent comment response concerning alternatives to MHA that could achieve objectives.

2. **Housing & Socioeconomics—Displacing affordable housing should be replaced. Payments should be higher, especially on office buildings. Need for income diversity. Need diversity of employment types, not just tech. Downsize single family building footprint unless includes ADU/DADU.**

Thank you for your comment. Your comment is noted. Please see frequent comment response concerning Location of MHA housing units and Single Family zones outside the study area.

3. **Land Use—Increasing demand for parks. Parks are important for human health. Concern about density impacting stormwater management.**

Thank you for your comment. Your comment is noted. Please see EIS chapters 3.2 Land Use and 3.7 Open Space and Recreation, including mitigation measures.

4. **Aesthetics—In favor of upper level setbacks to prevent shadowing. Other aspects of design should be considered.**

Thank you for your comment. Your comment is noted. Please see EIS Chapter 3.3 Aesthetics, including mitigation measures.

5. **Transportation—Concern about parking, in favor of alternate modes of transportation, though shift from cars seems unrealistic. Bus service is not rapid if it sits in traffic.**

Thank you for your comment. Your comment is noted. Please see EIS Chapter 3.4 Transportation, including mitigation measures.

6. **Historic Resources—Need to preserve some historic buildings.**

Thank you for your comment. Your comment is noted. Please see EIS Chapter 3.5 Historic Resources, including mitigation measures.

7. **Biological Resources—Interest in nature and people coexisting. Nature should be everywhere to mitigate climate change and heat island effects.**

Thank you for your comment. Your comment is noted. Please see EIS Chapter 3.6 Biological Resources, including mitigation measures.

8. **Open Space and Recreation—More focus on open space, less on sports fields. Make space for walking.**

Thank you for your comment. Your comment is noted. Please see EIS Chapter 3.7 Open Space and Recreation, including mitigation measures.

9. **Public Services & Utilities—Daylighting in buildings could be improved. Alternative energies are important. Focus should be on conservation.**

Thank you for your comment. Your comment is noted. Please see EIS Chapter 3.8 Public Services and Utilities, including mitigation measures.

10. Air Quality & Green House Gas Emissions—Put services and jobs near where people live to reduce transportation demand.

Thank you for your comment. Your comment is noted. Please see EIS Chapter 2.0 Description of the Proposed Action and Alternatives for a discussion of the zone change strategy to locate more housing and housing choices near transportation infrastructure and jobs. Please also see EIS Chapter 3.9 Air Quality and Greenhouse Gas Emissions, including mitigation measures.

Anonymous 15

1. Description of the Proposed Action and Alternatives—Concern for renters who don't qualify for affordable housing but can't afford market rate.

Thank you for your comment. Your comment is noted. Please see EIS Chapter 3.1 Housing and Socioeconomics, which includes impacts on housing supply and housing affordability, as well as mitigation measures.

2. Land Use—Too little, too late.

Thank you for your comment. Your comment is noted.

Anonymous 17

1. Land Use—Prefers Alternative 1, or Alternative 3 if zoning changes are necessary. Concern about decreasing property values for younger families who own homes in single family areas.

Thank you for your comment. Your comment is noted. Please see FEIS Chapter 2.0 for a description of the preferred alternative.

Anonymous 18

1. Description of the Proposed Action and Alternatives—Preference for implementation of MHA.

Please see Chapter 2.0 for a description of the preferred alternative.

2. Transportation—Request for the City to encourage transit use.

Please see Chapter 3.3 Transportation.

Anonymous 19

1. Description of the Proposed Action and Alternatives—MHA doesn't go far enough in increasing supply of affordable housing. Increase payment requirements. Concern about loss of mixed income housing.

Thank you for your comment. Your comment is noted. Please FEIS Chapter 2.0 for a description of the preferred alternative and frequent

comment response concerning MHA affordable housing requirements.

Anonymous 20

Description of the Proposed Action and Alternatives

1. **Growth projections are too low and do not reflect most recent pipeline project information.**

The EIS accounts for pipeline projects when estimating MHA affordable housing production, understanding that projects already permitted will not contribute to affordable housing payment or performance. The basis for growth projections in the MHA EIS relies on the minimum estimates for future housing and job growth from the Comprehensive Plan. Adopted in 2016, these 20-year growth estimates are based on statewide population forecasts from the Washington State Office of Financial Management (OFM), reflect policy guidance from regional and countywide growth management plans, and are the product of extensive review, including formal adoption by the Seattle City Council and approval by the Washington State Department of Commerce. The urban village growth estimates in Seattle 2035 represent the minimum growth the City must plan for and identify a relative distribution of those new housing units and jobs throughout the city. As part of the Seattle 2035 planning process, the City also conducted a sensitivity analysis that considered growth of 100,000 net new housing units.

The No Action Alternative relies on the Comprehensive Plan growth estimates for evaluating impacts. The two Action Alternatives consider the possibility of additional growth based on the capacity increases to implement MHA. The Comprehensive Plan growth estimates consider several factors, including land use constraints in urban villages, the proportion of growth expected for different types of urban villages, physical factors such as transportation infrastructure, and historical growth patterns. By building on the comprehensive plan growth estimates, the many assumptions and analyses that informed the Seattle 2035 planning process are integrated into the estimation of additional growth due to MHA implementation.

Please see EIS Appendix G for more detail.

2. **Growth projections are too low and do not reflect most recent pipeline project information. Reassess impacts of all alternatives with new information.**

Please see comment response above.

3. **The DEIS underestimates mobility challenges. The EIS should delineate between urban villages that will get light rail and those that will not, and not expand urban village boundaries beyond current or funded infrastructure capacity.**

The MHA EIS relies on growth estimates from the Comprehensive Plan, which is our best available guide for estimating housing and job growth citywide. New transportation investments such as bus service

often occur at more regular intervals than the Comprehensive Plan planning horizon, a period of twenty years.

4. All maps in Appendix A should show boundaries of urban villages and expansion areas to properly assess data and Displacement/Opportunity designations.

The Comprehensive Plan Growth and Equity Analysis shows estimated urban village boundary expansions, which are closely aligned with the expansion areas in the Preferred Alternative. New areas within the boundary expansions further reinforce those urban villages' typologies as high or low risk of displacement, and high or low access to opportunity.

5. through 25. The displacement risk and access to opportunity typology is flawed.

Please see frequent comment response concerning Displacement Risk Access to Opportunity Typology.

26. Comment 2-26—Growth estimates for Crown Hill are incorrect.

Please see the Preferred Alternative in Chapter 2.0 Description of the Proposed Alternatives and EIS Appendix G.

27. Comment 2-27—Appendix G does not provide specific data for each urban village. Growth estimates should be specific to each urban village.

Please see frequent comment response concerning Individual Urban Village Review.

28. Comment 2-28—The EIS should include analysis of the impact of upzoning on Equity categories.

Please see frequent comment response concerning Displacement Risk Access to Opportunity Typology.

29. The final EIS should account for displacement of households living in existing units in assessment of equity categories.

Please see frequent comment response concerning Displacement Risk Access to Opportunity Typology. Furthermore, the existing typology is integral to the policy proposal, for which impacts are assessed in the EIS. The EIS is not an assessment of the typology itself.

30. Comment 2-30—Zoning suffixes should be expanded to provide additional categories.

Please see frequent comment response concerning MHA affordable housing requirements.

31. Comment 2-31—The EIS should analyze where MHA requirements will suppress development in NC areas.

Please see frequent comment response concerning MHA affordable housing requirements.

32. Comment 2-32—Maps should more clearly differentiate between M1 and M2 zone changes.

Thank you for your comment. Your comment is noted.

33. Comment 2-33—Exhibits 2.11-2.14 are misleading.

Thank you for your comment. Your comment is noted.

34. Comment 2-34—Data analysis should differentiate between Hub Urban Villages and Residential Urban Villages

Please see frequent comment response concerning Individual Urban Village Review.

Anonymous 21

1. Comment 3.1-1—The displacement risk and access to opportunity typology is flawed.

Thank you for your comment. Your comment is noted. Please see frequent comment response concerning Displacement Risk Access to Opportunity Typology.

2. Comment 3.1-3—Appendix G does not provide specific data for each urban village. Growth estimates should be specific to each urban village.

Thank you for your comment. Your comment is noted. Please see frequent comment response concerning Individual Urban Village Review.

3. Comment 3.1-4—Data for real estate market areas does not align with urban village geographies.

Thank you for your comment. Your comment is noted. Please see frequent comment response concerning Individual Urban Village Review.

4. Comment 3.1-5—Studies in Chapter 3.1 should be broken down by urban village.

Thank you for your comment. Your comment is noted. Please see frequent comment response concerning Individual Urban Village Review.

Anonymous 22

1. and 2. Comment 3.2-1 and 3.2-2—Comp Plan assumptions and growth estimates are underestimated.

Please see response to Anonymous 20 Comment 2-1.

3. Comment 3.2-3—References to land use goals in the comprehensive plan discuss requirements that are not enforced.

Thank you for your comment. Your comment is noted.

4. through 7. Comments 3.2-4 through 3.2-7—Proposed zoning is inconsistent with comprehensive plan land use goals.

Please see response to Barker, Deb comment concerning Neighborhood Plan Conflicts.

8. and 9. Comment 3.2-8 and 3.2-9—Exhibit 3.2-6 should be broken down per Urban Village

Please see frequent comment response concerning Individual Urban Village Review.

10. Comment 3.2-10—The EIS does not study the economic displacement risk of rezoning from residential to commercial.

Thank you for your comment. Your comment is noted.

11. Comment 3.2-11—Zone changes in Crown Hill are acknowledged to be “significant” and “notable” but are not addressed with an appropriate level of gravity elsewhere in the DEIS, and are downplayed in all displacement risk analyses.

Thank you for your comment. Your comment is noted.

12. Comment 3.2-12—Proposed zoning is inconsistent with comprehensive plan land use goals.

Please see response to Barker, Deb comment concerning Neighborhood Plan Conflicts.

13. Comment 3.2-13—Proposed zoning needs to comply with City of Seattle Right of Way requirements.

Thank you for your comment. Your comment is noted.

14. Comment 3.2-14—Only one method for increasing development capacity was considered, and its variety of impacts will reduce effectiveness of mitigation measures.

Please see frequent comment response concerning Alternatives to MHA that could achieve objectives.

15. Comment 3.2-15—Majority of mitigation measures look at land use in isolation. Should consider other aspects of land use.

Thank you for your comment. Your comment is noted.

16. Comment 3.2-16—An excess of development capacity already exists in Crown Hill. It is premature to expand the boundary.

Thank you for your comment. Your comment is noted.

17. Comment 3.2-17—Proposed zoning is inconsistent with comprehensive plan land use goals.

Please see response to Barker, Deb comment concerning Neighborhood Plan Conflicts.

18. Comment 3.2-18—Proposed zoning is inconsistent with comprehensive plan growth estimates and would result in categorical change within displacement risk and access to opportunity.

Please see response to Barker, Deb comment concerning Neighborhood Plan Conflicts and frequent comment response concerning Displacement Risk Access to Opportunity Typology.

19. Comment 3.2-19—A Crown Hill Neighborhood Plan and design guidelines are needed.

Thank you for your comment. Your comment is noted.

20. Comment 3.2-20—Outcome-based analysis is needed to track success of MHA.

The Office of Housing will track and report payment and performance units produced through MHA, and citywide efforts are actively engaged in close monitoring of livability and equity outcomes across City departments.

21. Comment 3.2-21—Proposed mitigation measures are inconsistent with city ordinances.

Please see response to Barker, Deb comment concerning Neighborhood Plan Conflicts.

22. Comment 3.2-22—The Final EIS should address and comply with the SEPA Cumulative Effects Policy.

Please see frequent comment response concerning Citywide impacts.

23. Comment 3.2-23—Preservation of existing housing stock should be implemented with MHA.

Please see the Seattle Housing Affordability and Livability Agenda: Final Advisory Committee Recommendations to Mayor Edward B. Murray and the Seattle City Council. Preservation strategies are included in MHA. MHA payments fund building preservation that is dedicated to income- and rent-restricted housing. Other recommendations focus on tax incentives for property owners. These are being pursued at the state level.

24. Comment 3.2-24—Proposed zoning is inconsistent with comprehensive plan goals.

Please see response to Barker, Deb comment concerning Neighborhood Plan Conflicts.

Anonymous 23

1. Comment 3.3-1—Exhibit 3.3-1 should show maps comparing allowed heights under each Action Alternative.

Exhibit 3.3-25 shows proposed height changes under each alternative. None of the alternatives proposes allowed heights greater than 75 feet in Crown Hill.

2. **Comment 3.3-2—Evaluating all neighborhoods using the same criteria of built form and to generalize discussion of impacts is inappropriate.**

Thank you for your comment. Your comment is noted. Please see frequent comment response concerning Individual Urban Village Review.

3. **Comment 3.3-3—The assessment characterizes new development under the proposed alternatives as infill. The changes proposed include significant height increases that should not be characterized as infill.**

The term infill is used to convey the idea of development within areas already developed, in an urban rather than suburban or rural context. There are no intended inferences about relative scale of development when using the term infill.

4. **Comment 3.3-4—Alternative 3 does not support comprehensive plan goals to accommodate the majority of new housing units and increases in density in the central areas of the Crown Hill and Ballard urban villages.**

In Ballard and Crown Hill, Alternative 3 shows greater capacity increases than Alternative 2 and the No Action Alternative. FAR limits are greatest in NC zones, which are proposed along or adjacent to commercial and arterial spines in both urban villages, roughly approximating the central areas of those places. Proposed lowrise zones further from the commercial and arterial spines have substantially lower FAR limits, along with larger setback requirements, which together result in more limited capacity in those zones.

5. and 6. **Comment 3.3-5 and 3.3-6—Alternative 3 does not support comprehensive plan goals for maintaining the physical character of single-family zoned areas in Crown Hill and Ballard.**

Thank you for your comment. Your comment is noted. Please see response to Barker, Deb comment concerning Neighborhood Plan Conflicts.

7. **Comment 3.3-7—Exhibits 3.3-2 through 3.3-5 is not representative of the full range of scale of existing single-family and low-rise multi-family buildings. Photographs and 3D illustrations overestimate the height of single family homes in Crown Hill.**

As described in frequent comment response concerning Individual urban village review, the EIS is a programmatic document designed to assess impacts at a citywide scale. Detailed evaluation of effects of planning-level alternatives in specific locations would depend on site-specific information not yet available, such as building footprints, heights, and locations. Evaluation of these impacts is best done at the project level through site-level SEPA review or the building permit process, as described on page 3.165.

8. Comment 3.3-8—The study should include proposed changes to Design Review currently under consideration.

The Final EIS Aesthetics chapter is updated with current information describing the pending potential changes to the design review thresholds and programs.

9. Comment 3.3-9—Under proposed Design Review thresholds, significant portions of urban villages would no longer require Design Review. The study needs to address aesthetic impact of decreased design oversight for LR development in each urban village.

The Final EIS includes information about proposed changes to Design Review alongside current thresholds and speaks to the aesthetic impacts of proposed zone changes under the proposed program.

10. Comment 3.3-10—Seattle Municipal Code should mandate neighborhood-specific guidelines for all urban villages prior to implementing MHA.

The Design Review program relies on Citywide design guidelines where specific neighborhood guidelines have not been developed. The proposal is aimed at providing additional affordable housing so the City intends to pursue mitigation measures that will alleviate impacts while still achieving the goal of improved housing affordability. Nothing in this proposal impedes the ability of the City to pursue development of neighborhood-specific design guidelines.

11. Comment 3.3-11—Bulk, scale, and direct sunlight impacts should not be underestimated. Design standards are crucial to maintaining comprehensive plan land use goals.

The Design Review program relies on Citywide design guidelines where specific neighborhood guidelines have not been developed. These help align new development with comprehensive plan goals where appropriate.

12. Comment 3.3-12—(M2) zone changes should not be underestimated. Individual neighborhood impacts should be studied to assess loss of character.

As described in frequent comment response concerning individual urban village review, the

EIS is a programmatic document designed to assess impacts at a citywide scale. Detailed evaluation of effects of planning-level alternatives in specific locations would depend on site-specific information not yet available, such as building footprints, heights, and locations. Evaluation of these impacts is best done at the project level through site-level SEPA review or the building permit process, as described on page 3.165.

13. and 14. Comments 3.3-13 and 3.3-14—Exhibits 3.3-9-14 and 3.3-16-17 are misleading. Images should accurately represent the full range of existing conditions in the study area.

As described in frequent comment response concerning individual urban village review, the EIS is a programmatic document designed to assess impacts at a citywide scale. Detailed evaluation of effects of planning-level alternatives in specific locations would depend on site-specific information not yet available, such as building footprints, heights, and locations. Evaluation of these impacts is best done at the project level through site-level SEPA review or the building permit process, as described on page 3.165.

15. Comment 3.3-15—Privacy standards are identified as a potential mitigation measure. These should be defined and their impacts assessed, as some measures within this description could have negative impacts on the environment.

Mitigation measures are discussed generally and specifics of their implementation, including impacts, are outside the scope of this programmatic EIS.

16. Comment 3.3-16—A standard definition of the term “urban” should be developed. There is a lack of sidewalks, drainage, and adequate transit in Crown Hill. These are needed to support urban growth.

The term urban is used to broadly convey characteristics such as housing and population density, and does not intended to infer specific infrastructure conditions. Note that multifamily and commercial development includes requirements for right of way improvements, including sidewalks, and that transit investments tend to prioritize areas with greater population density.

17. Comment 3.3-17—Evaluation of shadowing on open space is limited to one type of condition and should be expanded to include varying widths of the ROW.

As described in frequent comment response concerning individual urban village review, the EIS is a programmatic document designed to assess impacts at a citywide scale. Detailed evaluation of effects of planning-level alternatives in specific locations would depend on site-specific information not yet available, such as building footprints, heights, and locations. Evaluation of these impacts is best done at the project level through site-level SEPA review or the building permit process, as described on page 3.165.

18. Comment 3.3-20—Alternative 2 shows no M2 changes for Eastlake, Upper Queen Anne, or Fremont. Please include an explanation. These places have more transit and one is a designated Hub Urban Village.

Thank you for your comment. Your comment is noted. Note that some M2 changes are proposed in Alternative 3. Please refer to EIS Chapter 2.0 for a description of the proposed alternatives, as well as a description of the Preferred Alternative, for an explanation of the methodology used to apply zone changes across urban villages.

19. Comment 3.3-21—EIS indicates that height increases in Alternative 2 are overall lower than height increases in Alternative 3. This is misleading and inaccurate. Residential urban villages should be assessed separately from hub urban villages.

The statement about overall heights refers to the study area as a whole, not any particular urban village. As described in frequent comment response concerning individual urban village review the EIS is a programmatic document designed to assess impacts at a citywide scale. Detailed evaluation of effects of planning-level alternatives in specific locations would depend on site-specific information not yet available, such as building footprints, heights, and locations. Evaluation of these impacts is best done at the project level through site-level SEPA review or the building permit process, as described on page 3.165.

20. Comment 3.3-22—Suggested mitigation measures in the Aesthetics chapter include requiring design review for more types of development, yet proposed changes to the program would do the opposite.

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures.

DEIS Exhibit 3.3-6 stated design review thresholds for review. The FEIS includes updated information on design review thresholds reflecting recent action by the City Council to modify design review thresholds.

The FEIS includes updated discussion of design review thresholds to reflect recent action by City Council. In new design review regulations, special consideration is given in design review thresholds for areas being rezoned from single family to implement MHA. See also response to Bricklin, David comment 4.

21. Comment 3.3-23—Neighborhood design guidelines are crucial to mitigating zone changes and should be mandatory under MHA.

The Design Review program relies on Citywide design guidelines where specific neighborhood guidelines have not been developed. The proposal is aimed at providing additional affordable housing so the City intends to pursue mitigation measures that will alleviate impacts while still achieving the goal of improved housing affordability. Nothing in this proposal impedes the ability of the City to pursue development of neighborhood-specific design guidelines.

22. Comment 3.3-24—Detailed shading, shadow, and view studies should be required for new development where a single story increase is proposed, not just places where 30' or more additional height is allowed under proposed zone changes.

The Design Review program relies on Citywide design guidelines where specific neighborhood guidelines have not been developed. The proposal is aimed at providing additional affordable housing so the City intends to pursue mitigation measures that will alleviate impacts while still achieving the goal of improved housing

affordability. Nothing in this proposal impedes the ability of the City to modify requirements for the Design Review process.

Anonymous 24

- 1. The DEIS omits analysis and mitigation of impacts to mobility and safety due to lack of sidewalks in areas of concentrated growth. Comprehensive Plan goals will not be supported without adequate sidewalk infrastructure.**

Please see frequent comment response concerning Individual urban village review. The EIS is a programmatic document designed to assess impacts at a citywide scale. Detailed evaluation of effects of planning-level alternatives in specific locations would depend on site-specific information not yet available, such as building footprints, heights, and locations. Evaluation of these impacts is best done at the project level through site-level SEPA review or the building permit process, as described on page 3.165.

Also note that multifamily and commercial development includes requirements for right of way improvements, including sidewalks, where no requirement exists today in areas zoned single family.

- 2. DEIS does not include analysis of stormwater flooding and impacts on pedestrian mobility and safety.**

This is a programmatic DEIS that addresses area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects that will be required are also unknown. Individual development projects will undergo separate and more detailed SEPA review during which specific impacts and mitigation (including localized stormwater management) will be determined. Note that the City's stormwater code includes requirements for stormwater management onsite, where no requirement exists today in the absence of development.

Please also see frequent comment response concerning Impacts to Stormwater Infrastructure.

- 3. DEIS does not include analysis of pedestrian and bike safety and mobility in areas that lack sidewalks and have narrow streets.**

The DEIS addresses pedestrian and bicycle safety related to increases in traffic volume on page 3.212. "The travel demand model indicates that speeds throughout the network would be slightly lower under the action alternatives than under the no action alternative, which could have a beneficial effect on safety." Note that multifamily and commercial development includes requirements for right of way improvements, including sidewalks, where no requirement exists today in single family zoned areas.

4. DEIS does not include analyses of growth on greenway routes and does not consider mechanical signaling for pedestrian and bicycle safety.

Greenways are discussed in the Mitigating Measures section of Chapter 3.4 Transportation. "Pedestrian, bicycle, safety and parking conditions are also qualitatively evaluated and used for impact identification." Greenways are included in the infrastructure considered when evaluating bicycle and pedestrian safety.

5. DEIS does not include analysis and mitigation measures of pedestrian safety for urban villages bisected by highways or major freight routes.

Thank you for your comment. Your comment is noted. Please see frequent comment response concerning "Individual Urban Village Review".

6. DEIS does not include differentiated analysis of mobility needs for urban villages with and without light rail.

Thank you for your comment. Your comment is noted. Please see frequent comment response concerning "Individual Urban Village Review". Note that transit investments such as Bus Rapid Transit (BRT) tend to prioritize areas with greater population density.

7. DEIS does not include analysis of Transportation Demand Management mitigation as applied to Crown Hill. The transit system in this urban village is already over capacity. Other impacts and conditions should be evaluated.

The DEIS does not analyze specific impacts of proposed mitigation measures. This is a programmatic DEIS that addresses area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects that will be required are also unknown. Individual development projects will undergo separate and more detailed SEPA review during which specific impacts and mitigation (including transportation demand management) will be determined.

8. Concern about parking.

Please see frequent comment response concerning Impacts to parking.

9. DEIS omits Crown Hill from on-street parking occupancy analysis

Please see frequent comment response concerning Individual urban village review.

10. DEIS omits particular streets from analysis of travel corridors

Please see comment responses above. Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

11. Transit study for Crown Hill is insufficient, concern about bus overcrowding.

Please see comment responses above. Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

12. DEIS omits 15 Express Metro bus from analysis on transit overcrowding

Please see comment responses above. Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

13. Crown Hill analysis is incomplete, omits a primary arterial route

Please see comment responses above as well as frequent comment response concerning *Individual urban village review*.

14. Concern that travel times discussed in Appendix J produce the same results for the three alternatives

Comment noted. Please see comment responses above as well as Chapter 3.4 Transportation for analysis methodology, discussion of impacts, and mitigation measures.

15. DEIS omits trip data for transportation

Comment noted. Please see comment responses above as well as Chapter 3.4 Transportation for analysis methodology, discussion of impacts, and mitigation measures.

16. Growth and Equity Displacement Risk and Access to Opportunity indicator is compromised

Please see frequent comment response concerning Displacement Risk Access to Opportunity Typology.

17. Concern about transit choices from Crown Hill with current capacity

Please see frequent comment response concerning *Individual urban village review*. Please also see comment responses above as well as Chapter 3.4 Transportation for analysis methodology, discussion of impacts, and mitigation measures.

18. Transportation mitigation measures should include funding sources

Please see comment responses above as well as Chapter 3.4 Transportation for analysis methodology, discussion of impacts, and mitigation measures.

19. Transportation mitigation measures not adequate and should include funding sources

Please see comment responses above as well as Chapter 3.4 Transportation for analysis methodology, discussion of impacts, and mitigation measures.

20. Concern that mitigation measures do not include complete streets

Please see comment responses above as well as Chapter 3.4 Transportation for analysis methodology, discussion of impacts, and mitigation measures.

21. MHA DEIS is not aligned with mobility plans

Please see comment responses above as well as Chapter 3.4 Transportation for analysis methodology, discussion of impacts, and mitigation measures.

22. Vehicle trips in Crown Hill are underestimated in the DEIS

Please see frequent comment response concerning Individual urban village review. Please also see comment responses above as well as Chapter 3.4 Transportation for analysis methodology, discussion of impacts, and mitigation measures.

23. DEIS fails to acknowledge SEPA Cumulative Effects Policy

Please see frequent comment response concerning Cumulative impacts.

24. DEIS does not address safety and congestion due to increased traffic on side streets and alleys as a result of density

Please see frequent comment response concerning Individual urban village review. Please also see comment responses above as well as Chapter 3.4 Transportation for analysis methodology, discussion of impacts, and mitigation measures.

Anonymous 25

1. Historical inventories should be conducted for urban villages individually.

Thank you for your comment. Comment noted. Please see frequent comment response concerning Individual Urban Village review.

Anonymous 26

1. Comment 3.6-1—Impacts on tree canopy are not specific enough. Mitigation of stormwater drainage issues requires more information about canopy loss.

Please see frequent comment responses concerning *Impacts on tree canopy* and Impacts to stormwater infrastructure.

2. Comment 3.6-2—DEIS fails to consider tree loss in new RSL areas, which have no existing tree requirement.

New tree requirements for RSL zones have been proposed as a mitigation measure in Chapter 3.6 biological resources.

3. **Comment 3.6-3—DEIS does not adequately address impact on tree canopy where residential neighborhoods convert to multifamily.**

Please see frequent comment response concerning Impacts on tree canopy.

4. **Comment 3.6-4—The DEIS does not assess impacts on Piper’s creek watershed. The watershed is not clearly demarcated.**

Please see frequent comment response concerning Individual Urban Village Review.

5. **Comment 3.6-5—No mitigation is proposed for increased stormwater runoff.**

Please see frequent comment response concerning Impacts to stormwater infrastructure.

6. **Comment 3.6-6—DEIS does not assess stormwater runoff for RSL zones where there is no requirement for stormwater management.**

Please see frequent comment response concerning Impacts to stormwater infrastructure.

7. **Comment 3.6-7—FEIS should comply with SEPA Cumulative Effects Policy.**

Please see frequent comment response concerning Cumulative impacts.

Anonymous 27

1. **Comment 3.7-1—Greenways in areas without sidewalks are not providing mitigation for pedestrians.**

The Seattle Department of Transportation plans and implements greenways and includes walking as a priority along with bicycling. The mitigation measure includes potential development requirements for sidewalks, which would address those locations where currently there are gaps in the sidewalk network. Please see DEIS p. 3.238.

2. **Comment 3.7-2—DEIS fails to comply with SEPA Cumulative Effects Policy.**

Please see frequent comment response concerning Cumulative Impacts.

3. **Comment 3.7-3—DEIS does not demonstrate how proposal will comply with Comprehensive Plan goal to improve business areas in Ballard and Crown Hill.**

Please see comment response to Barker, Deb concerning Neighborhood Plan Conflicts.

4. **Comment 3.7-4—DEIS does not demonstrate how proposal will comply with Comprehensive Plan goal to increase access to open space, recreation, and views.**

Please see comment response to Barker, Deb concerning Neighborhood Plan Conflicts.

Anonymous 28

1. **Comment 3.8-1—The DEIS does not include mitigation measures for increased burden on the Seattle Fire Department.**

Please see DEIS Chapter 3.8 concerning Public Services and Utilities: “demand on fire and emergency services would be identified and managed as the project is implemented” and “impacts on fire and emergency services as a result of demand increases would be identified and managed during the project approval process.”

2. **Comment 3.8-2—The DEIS does not include analysis of emergency services accessing property on narrow streets.**

This is a programmatic DEIS that addresses area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects that will be required are also unknown. Individual development projects will undergo separate and more detailed SEPA review during which specific impacts and mitigation (including localized stormwater management) will be determined. Note that the City’s stormwater code includes requirements for stormwater management onsite, where no requirement exists today in the absence of development.

3. **Comment 3.8-3—The DEIS does not include mitigation measures for police response times.**

Please see response to comment #1 above.

4. **Comment 3.8-4—The DEIS does not acknowledge that the new North Precinct facility is on indefinite hold and may not accommodate more capacity.**

This is a programmatic DEIS that addresses area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects that will be required are also unknown. Individual development projects will undergo separate and more detailed SEPA review during which specific impacts and mitigation (including localized stormwater management) will be determined. Note that the City’s stormwater code includes requirements for stormwater management onsite, where no requirement exists today in the absence of development.

5. **Comment 3.8-5—The DEIS does not include mitigation of stormwater flooding and impacts on pedestrian mobility and safety.**

This is a programmatic DEIS that addresses area-wide land use zoning changes, rather than a project-specific proposal. Since the

actual locations and sizes of development are unknown at this time, the specific mitigation projects that will be required are also unknown. Individual development projects will undergo separate and more detailed SEPA review during which specific impacts and mitigation (including localized stormwater management) will be determined. Note that the City's stormwater code includes requirements for stormwater management onsite, where no requirement exists today in the absence of development.

6. Comment 3.8-6—Page 3.298 includes a list of sectors analyzed in the Comprehensive Plan. Crown Hill Urban Village is omitted from that study list.

Comment noted. Please see additional discussion of school capacity in the FEIS. Please see new map in the FEIS depicting location of school service areas and urban villages.

7. Comment 3.8-7—Whitman Middle School is missing from the list of schools lacking SRS program infrastructure.

Schools listed are those with projects included in BEX Phase IV, and are not correlated with SRS infrastructure.

8. Comment 3.8-8—DEIS does not provide sufficient Seattle Public School capacity mitigation.

Please see frequent comment response concerning Impacts to Seattle Public School capacity.

9. Comment 3.8-9—DEIS mitigation is inadequate to address flooding and drainage problems in Crown Hill.

Please see frequent comment response concerning Impacts to Stormwater Infrastructure.

10. Comment 3.8-10—DEIS fails to comply with SEPA Cumulative Effects Policy.

Please see frequent comment response concerning Cumulative impacts.

11. Comment 3.8-11—The final EIS should include how the City will commit to and implement specific steps to mitigate overcrowding and increase school capacity under MHA.

Please see frequent comment response concerning Impacts to Seattle Public School capacity.

Anonymous 30

1. Tall buildings (40 to 75 feet) will destroy sense of neighborhood and community if merged into residential areas. Other areas would be better, using existing buildings, or by tearing down run-down buildings, to help revitalize those areas.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix C MHA Implementation Principles, which include "Ensure

MHA program creates affordable housing opportunities throughout the city” and “Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.” Locating more housing near transit and amenity-rich areas helps meet goals for reducing car trips and increasing transit use, which support climate mitigation, equity, and livability goals.

Please also see EIS Chapter 3.3 Aesthetics, including mitigating measures.

2. **Zone changes in Crown Hill that include affordable housing are not beneficial for the neighborhood and its security. Build affordable housing elsewhere, in more dense neighborhoods such as the University District, Interbay, or in parts of Ballard.**

Please see frequent comment response concerning MHA affordable housing requirements and Location of MHA housing units. Note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

3. **Commenter does not want to live among tall buildings, or feel like they live downtown.**

Please see EIS Chapter 3.3 Aesthetics, including mitigation measures.

4. **Drivers in more dense development take parking from homeowners on residential streets. Parking will get worse for everyone. People are not giving up cars.**

Please see EIS Chapter 3.4 Transportation, including mitigation measures. Please also see frequent comment response concerning Impacts to parking.

5. **The waste management plant in Magnolia will have difficulty managing waste if there are more units built.**

Please see EIS Chapter 3.8 Public Services and Utilities including mitigation measures. Please also see frequent comment responses concerning Impacts to sanitary sewer systems and Impacts to Stormwater Infrastructure.

Anonymous 31

1. **Commenter is pleased to see Alternative 3 focusing growth in urban areas.**

Thank you for your comment. Your comment is noted. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, including the preferred alternative.

2. Housing costs are high and leading to displacement of long-term residents of areas including the Central District.

Thank you for your comment. Your comment is noted. Please see EIS Chapter 3.1 Housing and Socioeconomics.

3. The loss of large trees is negatively impacting quality of life and removal fines are too small.

Thank you for your comment. Your comment is noted.

4. See comment 3 & response

5. See comment 3 & response

6. See comment 3 & response

Anonymous 32

1. Commenter requests Alternative 2 for some villages and Alternative 3 for others.

Thank you for your comment. Your comment is noted. Please see FEIS Chapter 2.0 for a description of the preferred alternative.

2. Please limit unattractive buildings with random materials and colors. Learn lessons about architectural aesthetics from Pioneer Square.

Thank you for your comment. Your comment is noted. Please see EIS Chapter 3.3 for discussion of aesthetics and updates to the Design Review program and expansion of design guidelines in Seattle neighborhoods.

3. Commenter requests more woonerfs for pedestrians.

Thank you for your comment. Your comment is noted.

Anonymous 33

1. Commenter is opposed to the expansion of the North Rainier hub urban village into the Mt Baker neighborhood. This is a historic neighborhood.

Thank you for your comment. Your comment is noted. Please see Chapter 2.0 for a description of the preferred alternative including methodology for urban village expansion areas. Potential impacts to historic and cultural resources are discussed at a neighborhood level in Section 3.5.

Anonymous 34

1. No action should be taken until the empty contaminated lots are cleaned and built on Rainier Ave

Thank you for your comment. Your comment is noted.

2. **New apartments around Mt Baker light rail are low income housing only but should be inclusive of all incomes.**

Thank you for your comment. Your comment is noted.

3. **Commenter is opposed to the expansion of the North Rainier hub urban village into the Mt Baker neighborhood. This is a historic neighborhood.**

Thank you for your comment. Your comment is noted. Please see Chapter 2.0 for a description of the preferred alternative including methodology for urban village expansion areas. Potential impacts to historic and cultural resources are discussed at a neighborhood level in Section 3.5.

4. **Tearing down historic houses to build large box homes is detrimental to aesthetics of some neighborhoods**

Thank you for your comment. Your comment is noted.

Anonymous 35

1. **Chapter 2.0 reads like justification for the city's agenda to make money rather than an assessment of impacts to the Admiral neighborhood.**

Thank you for your comment. Your comment is noted.

2. **Multifamily housing would be a detriment to the walkability and quaint environment of the Admiral neighborhood.**

Also note that the EIS bases its analysis on US Census decennial demographic data as well as American Community Survey data, which include data on age.

3. **Concern about zone changes and their impacts on vehicle-related injury.**

Thank you for your comment. Your comment is noted. Please see EIS Chapter 3.4 which addresses vehicle-related safety impacts. Also note that the DEIS is a programmatic document designed to assess impacts at a citywide scale. Detailed evaluation of effects of planning-level alternatives in specific locations would depend on site-specific information not yet available, such as building footprints, heights, and locations. Evaluation of these impacts is best done at the project level through site-level SEPA review or the building permit process, as described on page 3.165.

4. **Zone changes will make Admiral more urban, but not more livable. Once zone changes are in place we cannot go back.**

Thank you for your comment. Your comment is noted.

5. **Zone changes will have adverse health effects.**

Thank you for your comment. Your comment is noted.

6. **Traffic and parking are already problems in Admiral.**

Thank you for your comment. Your comment is noted.

7. **Zone changes will bring more people and more cars, and more demand for transit. These transportation resources are already at or beyond capacity.**

Thank you for your comment. Your comment is noted.

8. **Not clear how development protects cultural and historic resources.**

Thank you for your comment. Your comment is noted.

9. **Tree canopy is being replaced by tall buildings. Impacts on animals are not assessed.**

The DEIS analyzes Environmentally Critical Areas within urban villages and expansion areas, which includes wildlife habitat.

10. **Commenter requests that Admiral be kept quaint. Zone changes will change this and there will be no turning back.**

Thank you for your comment. Your comment is noted.

11. **Concern about air quality impacts from Boeing Field and other contributors. Taller buildings will replace trees which help with air quality. Health will decline.**

Thank you for your comment. Your comment is noted. Please see EIS Chapter 3.9 Air Quality and Greenhouse Gas Emissions for discussion of impacts.

Anonymous 36

1. **Impacts of the two action alternatives are underestimated. Impacts on displaced persons, utilities, elderly, infrastructure, and rate payers.**

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning Impacts on racial and cultural minority groups and Displacement analysis. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

Please see EIS Chapter 3.8 Public Services and Utilities for discussion of impacts and mitigation measures.

2. **Insufficient exploration of other alternatives. Insufficient mitigation measures.**

Please see frequent comment response concerning Alternatives to MHA that could achieve objectives.

3. **Insufficient consideration of locations within study area, and what has/hasn’t worked in those places.**

Please see frequent comment response concerning Individual Urban Village review.

4. Inadequate analysis on infrastructure requirements and cost.

Thank you for your comment. Your comment is noted, however it is not specific enough for a detailed response.

5. Action alternatives largely benefit developers and pass costs along to communities.

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning Impacts on racial and cultural minority groups and Displacement analysis.

Please see frequent comment response concerning MHA affordable housing requirements and Location of MHA housing units. Note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

6. Alternative strategies not studied, such as rent control. Developers should not be able to pay their way out of building affordable housing. Questions about social justice.

Please see response to comment #5 above. Please see frequent comment response concerning Alternatives to MHA that could achieve objectives.

7. Taller and newer buildings replacing older ones sterilizes neighborhoods. Longtime owners and renters will have light and views blocked.

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures. Please see EIS Chapter 3.5 Historic Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning Analysis of historic resources. Please see frequent comment responses concerning Individual Urban Village review.

As described in Frequent Comment Topic regarding Individual Urban Village Review, the DEIS is a programmatic document designed to assess impacts at a citywide scale. Detailed evaluation of effects of planning-level alternatives on specific views or shading effects in specific locations would depend on site-specific information not yet available, such as building footprints, heights, and locations. Evaluation of these impacts is best done at the project level through site-level SEPA review or the building permit process, as described on DEIS page 3.165.

8. Concern about stormwater impacts and utility rates

Please see EIS Chapter 3.8 Public Services and Utilities for discussion of impacts and mitigation measures. Please also see

frequent comment response concerning Impacts to Stormwater Infrastructure.

9. Correction to mention of SPL, where SCL may have been intended. Concern about who pays for SCL infrastructure in absence of latecomer agreement.

Thank you for your comment. Your comment is noted. The correct reference to SCL has been made.

10. Real costs to utility rate payers are not accurately reported.

Thank you for your comment. Your comment is noted.

11. Statement about “no significant unavoidable impacts to public services or utilities” is flawed.

Please see EIS Chapter 3.8 Public Services and Utilities for discussion of impacts and mitigation measures. Please also see frequent comment response concerning Impacts to Stormwater Infrastructure.

12. Traffic and air quality will worsen with zone changes.

Please see comment response to Brennan, Alex regarding Greenhouse Gas Emissions.

Please also see EIS chapters 3.4 Transportation and 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures.

Anonymous 37

1. DEIS does not address differences between urban villages with and without light rail.

As described in Frequent Comment topic regarding Individual Urban Village Review, the DEIS is a programmatic document designed to assess impacts at a citywide scale. Detailed evaluation of effects of planning-level alternatives in specific locations would depend on site-specific information not yet available, such as building footprints, heights, and locations. Evaluation of these impacts is best done at the project level through site-level SEPA review or the building permit process, as described on page 3.165.

Anonymous 38

1. The Displacement Risk and Access to Opportunity typology is flawed. Information should be included about relative weight of each category, and some villages should be classified as medium.

Thank you for your comment. Your comment is noted. Please see frequent comment response concerning Disclaiming Risk and Access to Opportunity Typology.

Anonymous 39

1. DEIS did not study displacement risk of individual urban villages based on zone changes proposed.

As described in frequent comment topic regarding Individual Urban Village Review, the DEIS is a programmatic document designed to assess impacts at a citywide scale. Detailed evaluation of effects of planning-level alternatives in specific locations would depend on site-specific information not yet available, such as building footprints, heights, and locations. Evaluation of these impacts is best done at the project level through site-level SEPA review or the building permit process, as described on page 3.165.

Please also see DEIS Chapter 3.1 Housing and Socioeconomics for discussion of impacts on housing supply and affordability.

Anonymous 40

1. Displacement risk analysis uses rent and tenancy information for buildings of 20 or more units. This is an oversight. Analysis should include smaller rental complexes, including duplexes.

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning Impacts on racial and cultural minority groups and Displacement analysis. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

Please also see EIS Chapter 3.1 Housing and Socioeconomics as well as the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses payment dollars to fund acquisition and rehabilitation of existing housing.

Anonymous 41

1. DEIS does not include a broad range of action alternatives.

Thank you for your comment. Your comment is noted. Please see frequent comment response concerning Alternatives to MHA that could achieve objectives.

2. Insufficient study of impacts to individual urban villages.

Thank you for your comment. Your comment is noted. Please see frequent comment response concerning Individual Urban Village Review.

Anonymous 42

1. **Zone changes in Crown Hill from single family to NC-55/75 not adequately addressed. EIS should consider impacts on multiple elements of the environment due to zone changes from residential to commercial use.**

As described in frequent comment topic regarding Individual Urban Village Review, the DEIS is a programmatic document designed to assess impacts at a citywide scale. Detailed evaluation of effects of planning-level alternatives in specific locations would depend on site-specific information not yet available, such as building footprints, heights, and locations. Evaluation of these impacts is best done at the project level through site-level SEPA review or the building permit process, as described on page 3.165.

Please see FEIS Chapter 2.0 Description of the Proposal and Alternatives. The preferred alternative for the Crown Hill urban village does not include proposed zone changes from single family to neighborhood commercial.

Anonymous 43

1. **Impacts on public schools should be a standalone chapter.**

Thank you for your comment. Your comment is noted. Please see additional FEIS analysis concerning Seattle Public Schools and school capacity in the study area. See also response to Pollet, Gerry.

2. **Mitigation measures for public schools are inadequate.**

Please see FEIS analysis concerning Seattle Public Schools and school capacity in the study area.

3. **EIS should assess areas which are not suitable for school enrollment growth and wait until capacity exists there before implementing zone changes.**

Please see FEIS analysis concerning Seattle Public Schools and school capacity in the study area.

Anonymous 44

1. **DEIS does not provide examples of development currently occurring in lowrise zones in Crown Hill, which include townhomes built in the back yard of existing single family areas.**

Please see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study, which includes a variety of scenarios for each zone. Please also see frequent comment response concerning Individual Urban Village Review.

Anonymous 45

1. **Commenter is generally supportive of Alternative 3 zone changes in Madison Miller.**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes the preferred alternative.

2. **Zone changes from single family to lowrise should include mitigation for loss of play spaces, traffic calming, and create more play streets.**

Please see EIS chapters 3.4 and 3.7 for discussion of mitigation measures for transportation and open space and recreation impacts.

3. **Commenter notes that implementing Alternative 3 would likely result in more affordable rent- and income-restricted housing than Alternatives 1 or 2.**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes the preferred alternative, and Chapter 3.1 Housing and Socioeconomics.

4. **Commenter notes that Alternative 3 provides best opportunity for achieving infrastructure investments with lower cost per household.**

Please see EIS Chapter 3.8 Public Services and Utilities.

5. **Madison-Miller should have its own restricted parking zone (RPZ) to better manage on-street parking, and this program should be improved overall.**

Please see EIS Chapter 3.4 Transportation, Mitigation Measures section which includes a discussion of RPZ areas and identifies that changes to the RPZ program could be implemented.

6. **Commenter does not support M2 change from single family to LR3 east of Miller Park.**

Please see FEIS Chapter 2.0 Description of the Proposal and Alternatives, which includes the preferred alternative. Note that the preferred alternative zone change map for Madison Miller shows zone changes immediately east of Miller Playfield. Propose changes are from single family to Residential Small Lot (RSL) and Lowrise 1 (LR1). The preferred alternative does not include single family to Lowrise 3 zone changes in the area east of Miller Playfield.

7. **Commenter is disappointed that an urban village expansion is not considered to the north, west, and south.**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the methodology for urban village expansion areas developed during the Seattle 2035 Comprehensive Planning process.

Anonymous 46

1. DEIS does not make street level assessment of impacts, including other city projects such as Terminal 5 and ST3.

Please see frequent comment response concerning Individual urban village review. The DEIS is a programmatic document designed to assess impacts at a citywide scale. Detailed evaluation of effects of planning-level alternatives in specific locations would depend on site-specific information not yet available, such as building footprints, heights, and locations. Evaluation of these impacts is best done at the project level through site-level SEPA review or the building permit process, as described on DEIS page 3.165.

Please also see frequent comment response concerning Cumulative impacts.

2. Commenter notes that “Junction” will not gain “meaningful” affordable housing in exchange for zone changes in that area.

Thank you for your comment, however it is unclear which area the comment concerns, whether Morgan or West Seattle Junction. Please see frequent comment responses concerning MHA affordable housing requirements and Location of MHA housing units.

3. DEIS does not include sufficient mitigation for light, air, and views, and does not identify public and private views that will be lost.

Please see frequent comment response concerning Individual urban village review. The DEIS is a programmatic document designed to assess impacts at a citywide scale. Detailed evaluation of effects of planning-level alternatives in specific locations would depend on site-specific information not yet available, such as building footprints, heights, and locations. Evaluation of these impacts is best done at the project level through site-level SEPA review or the building permit process, as described on DEIS page 3.165.

With respect to mitigation measures: Please see EIS Chapter 3.3 Aesthetics section on Mitigation Measures which includes design and development standards to mitigate impacts on light, air, and views. This section also references protected public view corridors, available in Seattle Municipal Code 25.05.675.P.

4. DEIS does not use meaningful data and fails to acknowledge lack of infrastructure to support increases in density.

Thank you for your comment, however the comment is not specific enough to respond to. Please see EIS chapters 3.4, 3.6, 3.7, and 3.8 for discussion of local infrastructure impacts and mitigation measures.

5. DEIS fails to propose mitigation for loss of greenspace in already lacking neighborhood.

Thank you for your comment. Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts on open space and recreation, as well as mitigation measures.

6. DEIS fails to consider impacts to emergency services, response times, and school capacity.

Thank you for your comment. Please see EIS Chapter 3.8 Public Services and Utilities for discussion of impacts on emergency services and schools. Please also see expanded section in the FEIS on school capacity.

Anonymous 47

1. DEIS does not include impacts on school capacity.

Thank you for your comment. Please see EIS Chapter 3.8 Public Services and Utilities for discussion of impacts on schools. Please also see expanded section in the FEIS on school capacity. Please see frequent comment response concerning Impacts to school capacity.

2. DEIS does not properly represent impacts to individual urban villages which are unique.

Please see frequent comment response concerning Individual urban village review. The DEIS is a programmatic document designed to assess impacts at a citywide scale. Detailed evaluation of effects of planning-level alternatives in specific locations would depend on site-specific information not yet available, such as building footprints, heights, and locations. Evaluation of these impacts is best done at the project level through site-level SEPA review or the building permit process, as described on DEIS page 3.165.

3. Each urban village and surrounding area needs its own EIS.

Please see response to previous comment.

4. DEIS does not address cumulative impacts of proposal and separate SEPA actions.

Please see frequent comment response concerning Impacts to school capacity.

Anonymous 48

1. The comment document requests completion of an EIS pertaining to just the South Park neighborhood. The comment document notes that South Park has serious environmental issues, and expresses concern about notice and public engagement.

Comments noted. Thank you for your comment. Please see frequent comment responses concerning individual urban village review and community engagement. Please see also Appendix B. Please see the Preferred Alternative map at Appendix H for South Park. In recognition of constraints in South Park, the minimum zoning changes necessary to implement MHA are proposed for the South Park area. This approach is consistent with the approach proposed for areas outside of urban villages under the action alternatives.

Anonymous 49

1. **The comment document requests completion of an EIS pertaining to just the South Park neighborhood. The comment document notes that South Park has serious environmental issues, and expresses concern about notice and public engagement.**

Comments noted. Thank you for your comment. Please see frequent comment responses concerning individual urban village review and community engagement. Please see also Appendix B. Please see the Preferred Alternative map at Appendix H for South Park. In recognition of constraints in South Park, the minimum zoning changes necessary to implement MHA are proposed for the South Park area. This approach is consistent with the approach proposed for areas outside of urban villages under the action alternatives. Georgetown is an areas outside of an urban village, and proposed MHA implementation is limited to existing commercial and multifamily zoned properties under the action alternatives.

Antipas, Artemis, PhD Environmental Scientist

1. **The EIS does not meet EPA requirements**

Thank you for your comment. Your comment is noted but it is not specific enough to respond to

2. **The EIS is carried out in general and does not address neighborhood specifics.**

Thank you for your comment. Your comment is noted. Please see frequent comment response concerning *Individual Urban Village Review*

Appleman, Ira

1. **The commenter states that parking conditions have likely worsened since the City's last parking study.**

The DEIS used the most recently available data at the time of analysis, in this case the City's 2016 parking occupancy study which is conducted annually.

2. **Proposed mitigation measures will make the parking conditions worse.**

Please see the Frequent Comment Response – Parking Impacts and Mitigation document.

3. **The City claims there will be no significant parking impacts which is inaccurate.**

The commenter states that the City identifies no significant parking impacts—this is not correct. On DEIS page 3.213, the DEIS states “With the increase in development expected under Alternatives 2 and 3, 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.”

The DEIS states that the impacts could be brought to a less-than-significant level if the City pursues a combination of expanded paid parking zones, revised RPZ permitting, more sophisticated parking availability metrics and continued expansion of non-auto travel options. Please see the Frequent Comment Response – Parking Impacts and Mitigation document for additional discussion.

4. MHA creates a safety problem because people arriving home late will have to walk farther in the dark.

Because the vast majority of single and multifamily homes in the City have private off-street parking, it is not the City’s policy to provide a public on-street parking space adjacent to every resident’s home. Therefore, there is no impact identified for increasing the walking distance between available on-street parking and the final destination. Potential impacts of the proposed action on public safety are discussed in Section 3.8 Public Services and Utilities.

Arnett, Bill

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Avnery, Ofer-1

1. Zone change from 85 to 95 feet next to Othello light rail is not enough. Unless height limit increase to 120 feet, development above 70 feet is not feasible. Height increase does not provide enough value.

Thank you for your comment. Your comment is noted. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives.

Avnery, Ofer-2

1. Commenter owns property near a light rail station and requests zone changes from single family to Lowrise 1 or greater capacity.

Please see FEIS Chapter 2.0 Description of the Proposal and Alternatives for discussion of methodology for the preferred alternative. Also see FEIS Appendix H, which shows zoning maps for the preferred alternative.

Zone changes for both parcels discussed by commenter are proposed as Residential Small Lot (RSL) in the preferred alternative.

Avnery, Ofer-3

1. **Commenter supports HALA and recommends zone changes along eastern portion of Market Street in Ballard to NC-85. This zoning would justify construction costs.**

Please see FEIS Chapter 2.0 Description of the Proposal and Alternatives for discussion of methodology for the preferred alternative. Also see FEIS Appendix H, which shows zoning maps for the preferred alternative.

Zone changes in the preferred alternative for the area discussed are a mix of heights, from 65 to 95 feet.

2. **Extend the Ballard urban village as much as possible to the east.**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the methodology for urban village expansion areas developed during the Seattle 2035 Comprehensive Planning process.

Avnery, Ofer-4

1. **Please consider a designation of LR1 or LR2 for property at 2026 S Lane St instead of RSL.**

Comment noted. Please see the Preferred Alternative map in Appendix H for the 23rd and Union-Jackson urban village. Other principles support MHA implementation with an RSL designation at the property.

Ayres, Dara

For comments 1 through 6, and 8 through 13, please see comment responses to Holliday, Guy Madison-Miller Park Community Group.

7. **Land Use impacts analyzed and proposed mitigations are not adequate**

This is a programmatic DEIS that addresses area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects that will be required are also unknown. Individual development projects will undergo separate and more detailed SEPA review during which specific impacts and mitigation (including on light, air, public safety, traffic, and privacy) will be determined. Seattle Municipal Code 25.05.675.M.2.b expressly exempts on-street parking impact mitigation for new residential development within "portions of urban villages within 1,320 feet of a street with frequent transit service."

Bach, Claudia

1. **Alternative 2 meets needs of larger community**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes the preferred alternative.

2. **Retain character of residential housing with ADUs & DADUs, focus commercial on arterials**

Please see EIS Chapter 3.3 Aesthetics, which includes mitigation measures.

3. **Critical to improve transit to Crown Hill**

Please see EIS Chapter 3.4 Transportation, which includes mitigation measures.

4. **Include tree preservation and new planting in proposal**

Please see EIS Chapter 3.6 Biological Resources, which includes mitigation measures.

5. **Protect open space and more options for dogs**

Please see EIS Chapter 3.7 Open Space and Recreation, which includes mitigation measures.

Bader, Judith

1. **Supports comments and conclusions of the Madison Miller Park Community Group.**

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Bailey, Shannon

1. **Boundary expansions will stress infrastructure. Support for Alternative 1.**

Thank you for your comment. Your comment is noted. Please see Chapter 2.0 for a description of the preferred alternative including methodology for urban village expansion areas.

2. **Proposes alternative affordable housing solutions**

Thank you for your comment. Your comment is noted. Please see Frequent Comment Response concerning *Alternatives to MHA that could achieve objectives*.

3. **Urban village boundary expansion in Roosevelt**

Thank you for your comment. Your comment is noted. Please see Chapter 2.0 for a description of the preferred alternative including methodology for urban village expansion areas.

4. Require sidewalks and street improvements with development; concern for pedestrian safety

Thank you for your comment. Your comment is noted. Please see Chapter 3.4 Transportation, including mitigation measures.

5. Concern about impacts on police, fire, and medics

Please see DEIS Chapter 3.8 concerning Public Services and Utilities: “demand on fire and emergency services would be identified and managed as the project is implemented” and “impacts on fire and emergency services as a result of demand increases would be identified and managed during the project approval process.”

6. Air quality concerns from increasing traffic, fewer trees

Thank you for your comment. Your comment is noted. Please see chapters 3.6 Biological Resources and 3.9 Air Quality and Greenhouse Gas Emissions, including mitigation measures.

Baker, Jack

1. Alternatives 2 and 3 would put at risk this functional, livable and unique neighborhood.

See DEIS Chapter 3 for analysis of potential impacts stemming from Alternative 2 and 3 including on aesthetics, and land use. Potential displacement impacts are discussed in Section 3.1 Housing and Socioeconomics.

2. Supports comments and conclusions of the Madison Miller Park Community Group.

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Baldner, Dan

1. Supports comments and conclusions of the Madison Miller Park Community Group.

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Barber, Jason

1. Supports comments and conclusions of the Madison Miller Park Community Group.

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

2. Reevaluate the characterization of Madison-Miller as a Low Displacement Risk and High Access to Opportunity area.

Please see response to Holliday, Guy, and frequent comment response concerning the displacement risk / access to opportunity typology.

3. Urban villages are being forced to bear a livability cost that other neighborhoods are not.

Please see frequent comment response concerning location of MHA affordable housing. See DEIS Chapter 3 for discussion of potential impacts including parking, open space, and infrastructure including sanitary sewer infrastructure.

4. Additional density can be accommodated without sacrificing aesthetics. Setbacks should be required.

Please see Section 3.3 for discussion of potential aesthetic impacts. Setbacks are required in existing zones and zones proposed for MHA implementation. The proposal includes additional upper level setback requirements in neighborhood commercial zones.

5. Consider more use of the Residential Small Lot zone in Madison-Miller.

Comment noted. Please see the Preferred Alternative map in Appendix H for the Madison-Miller urban village.

Barker, Deb (Morgan Junction Community Association)

1.
 - a. Recommends implementing MHA without zoning changes, and **request** Alternative 1 (No Action) zoning be implemented in Morgan Junction.
 - b. **Commenter recommends retaining previous definition of RSL**
 - c. **Commenter recommends requiring developer impact fees citywide, not just in urban villages**
 - d. **Commenter recommends increasing MHA percentage requirements** when displacement occurs to generate significantly more affordable housing
2. **Flawed typology – Morgan Junction is grouped with Aurora-Licton Springs as a Low Risk of Displacement, Low Access to Opportunity urban village, but the two are very different. They should not be grouped nor should the same treatment be applied.**

See frequent comment response concerning Displacement Risk, Access to Opportunity Typology.

Categorizing urban villages by their relative displacement risk and access to opportunity in the EIS allows for an evaluation of whether or not impacts would disproportionately impact or benefit historically marginalized populations. Where these populations are not prevalent, alternative methods were studied to achieve the MHA

programmatic goal of 6,200 rent- and income-restricted homes over ten years. Integral to achieving this goal are zone changes that implement the program, applied to areas of the city designated for growth in the City's Comprehensive Plan.

Morgan Junction and Aurora-Licton Springs are in the same Displacement and Opportunity category, and so a similar increment of capacity was applied to both urban villages. With the (M) increment applied broadly in both places, and a slightly smaller degree of (M1) changes, the two urban villages that today are markedly different in zoning and character will receive capacity that is proportional to what currently exists. For example, there are substantial swathes of commercial zoning in Aurora-Licton Springs that are proposed for mixed-use commercial zoning, a change in the type of use allowed as well as the one story increase. The Morgan Junction preferred alternative shows a rather different condition for capacity outcomes with relatively large areas of RSL, and smaller amounts of lowrise and NC areas, particularly when accounting for those areas already zoned lowrise and NC. Though the increment of capacity is similar, the overall capacity and use outcomes are clearly distinct between these two places, as they are today.

See frequent comment response concerning "Individual Urban Village Review" to see how analysis was conducted at an urban village-by-urban village scale.

3. Growth Assignment impacts – Morgan Junction should be recategorized as high risk of displacement. The urban village risks losing existing affordable housing if upzoned as categorized.

See frequent comment response concerning Displacement Risk, Access to Opportunity Typology.

The Seattle 2035 Comprehensive Plan Growth and Equity report acknowledges that the economic and cultural milieu within which growth occurs can correlate with the degree to which physical, economic, and cultural displacement occur. The Growth and Equity Analysis conducted a vulnerability assessment approximating such contexts, locations across the city with relative displacement vulnerability based on six factors: people of color, linguistic isolation, educational attainment (% of the population who lack an advanced degree), housing tenancy, housing cost-burdened households, and household income. The assessment showed Morgan Junction as a low vulnerability area based on these factors, relative to Seattle's other urban villages. Based on this analysis and using the methodology applied citywide, the data does not support Morgan Junction being recategorized as high displacement risk as an urban village. The City recognizes that there are low-income populations throughout urban villages who will continue to need rent- and income-restricted housing. MHA is designed to address the critical housing needs of low-income populations.

4. **Affordability going elsewhere – single family zoned land has been listed for assembly and sale in anticipation of zoning changes, and without a guarantee that this kind of development include affordable housing, it will be built elsewhere. “Modest” single family homes will be lost.**

See frequent comment response concerning Location of MHA housing units.

The Office of Housing relies on several criteria to guide the allocation of MHA payment funds. One of the criteria is for affordable housing investments to be made near where the MHA funds are collected. Another criterion is for affordable housing investments to be equitably distributed to neighborhoods across the city. The Office of Housing has a strong track record of creating affordable housing in neighborhoods throughout the city. Using citywide data, the Office of Housing makes strategic investments for affordable housing where those dollars can be used for greatest public benefit, serving households with low and very low incomes, including families with children, people transitioning out of homelessness, and more.

5. **The MHA process was not inclusive – Existing neighborhood priorities were not incorporated into the program. Proposed zoning violates Morgan Junction Urban Village Neighborhood Plan.**

See frequent comment response concerning Community engagement. See response in this section to Neighborhood Plan Conflicts comment.

6. **Neighborhood Plan Conflicts – MHA zone changes are in conflict with the Morgan Junction Neighborhood Plan and the Comprehensive Plan. Request for formal Community/Neighborhood Planning process to address these conflicts.**

Implementing MHA requires amendments to the Comprehensive Plan. Where neighborhood plans call for retaining Single-Family zoning within the Urban Village, MHA legislation will change neighborhood plan policies to make them internally consistent with other citywide policies in the Comprehensive Plan. These amendments rely on nearly five years of Comprehensive Plan and MHA community engagement around creating more opportunity for households to call Seattle home. In addition to this previous engagement, OPCD and DON will conduct additional community engagement in support of the amendment process.

7. **Significant negative impact concerns – MoCA embraces density but the DEIS fails to show how Alternatives 2 and 3 adequately mitigate for displacement, infrastructure challenges, traffic, and air quality.**

See frequent comment responses concerning Displacement analysis, and Parking Impacts and Mitigation. See Chapter 3.4 Transportation for traffic analysis, including the No Action Alternative.

The comment is not specific enough in making reference to “supporting services” and “fragile infrastructure.”

On displacement, MHA is a displacement mitigation measure. In Seattle’s multifamily and commercial zones, MHA requires development to pay for affordable housing or include it onsite with development, where no requirement exists today.

8. **Land Use – Morgan Junction residents recommended MHA zone maps account for topography when considering zone adjacency. Alternatives 2 and 3 do not do this. Implement original version of RSL with associated setbacks and density limits.**

Community-generated MHA implementation principles call for zone transitions so that changes in height from block to block occur incrementally. The principles also call for consideration of unique conditions, and topography is one of those conditions considered for the preferred alternative. Please see FEIS Chapter 2.0 Description of the Proposal and Alternatives.

9. **Aesthetics and Cumulative Effects – Mitigation Measures have not proven successful and therefore are not appropriate. Assessment of light, shadow, and views is inadequate. There is no plan for adopting mitigation measures. Commenter challenges the statement about no significant unavoidable impacts with opinion that there are Significant Adverse Impacts.**

The EIS studies impacts on light and shadow in the urban environment in Chapter 3.3 Aesthetics. As a Programmatic EIS, project-level issues regarding specific views are not evaluated. Potential impacts to specific streets and corridors would be evaluated and mitigated at the project-level under applicable existing City permitting requirements and design review thresholds.

10. **Affected Environment – Challenge the term “efficiency” with respect to tall buildings and their use of urban land. Urban planning studies have shown that taller buildings and denser populations lead to less sunlight on sidewalks, higher crime rates, demoralized and less diverse populations. Misleading language about sunlight reaching ground level causes questions about adequacy of assessment.**

The EIS uses the term “efficiency” to describe how taller buildings tend to use urban land, a scarce resource, to provide more housing and space for employment than shorter buildings do. Externalities of that use, such as shading of sidewalks, building bulk, and more are explored in Chapter 3.3 Aesthetics. The tallest height limits proposed in Morgan Junction are 55 feet, or about five stories. Literature discussing correlation between tall buildings and adverse social impacts largely refers to high rises, none of which are proposed in Morgan Junction.

11. Design Guidelines – Changes to the Design Review program should be outlined in the EIS, including new thresholds under which projects are exempt, particularly single family to lowrise zone changes.

The Final EIS Aesthetics chapter is updated with current information describing the pending potential changes to the design review thresholds and programs.

12. Transportation – The EIS fails to address Washington State Ferry-related impacts on existing transportation within Morgan Junction and West Seattle Junction.

The Draft EIS and Final EIS include ferry data with transportation analysis, and such data has been cited in the Final EIS.

13. Historic Resources – 20th Century culturally significant artifacts in Morgan Junction are where zone changes are proposed, and mitigation is not sufficient for zone changes to 55' and 75' buildings.

The Preferred Alternative in the Final EIS does not include heights greater than 55' for the Morgan Junction urban village. Where 55' heights are concerned, the mitigation measures are commensurate with those applied elsewhere in the city, where lively commercial districts have successful examples of adaptive reuse and historic preservation of character buildings.

14. Open Space and Recreation – Density as proposed in Alternatives 2 and 3 will destroy park resources. The EIS fails to include impact fees for open space as a mitigation measure. Morgan Junction has open space deficits that will need to be addressed.

Chapter 3.7 discusses potential impacts of the proposed action on parks and open space. Section 3.7.3 describes mitigation measures. Impact fees for open space are included as part of regulatory tools to encourage and enforce developers to set aside publicly accessible usable open space.

15. MoCA supports more affordable housing for Morgan Junction that is compatible with the existing community.

Thank you for your comment. Your comment is noted and forwarded to City decision makers. Please see the Preferred Alternative in Chapter 2 of this Final EIS, which moderates heights and includes design and development standards.

Barnett, Bruce

1. Commenter requests density increases limit to 10-minute walkshed

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see discussion of urban village boundary expansion areas identified in the Seattle 2035 Comprehensive Planning process.

2. Request for transit infrastructure “dial-a-bus”

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

3. Request for renovation of existing housing instead of redevelopment

Please see EIS Chapter 3.1 Housing and Socioeconomics as well as the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses payment dollars to fund acquisition and rehabilitation of existing housing.

4. Concern about areas where density is not close to reliable transit

Thank you for your comment. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix C MHA Implementation Principles, which include “Ensure MHA program creates affordable housing opportunities throughout the city” and “Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.” Locating more housing near transit and amenity-rich areas helps meet goals for reducing car trips and increasing transit use, which support climate mitigation, equity, and livability goals.

Barney, Sybil

1. A zoning change to implement MHA on 11th Ave. E. between Prospect and Aloha would create an abrupt transition. Do not increase zoning capacity here.

The location is outside of the urban village, and is currently zoned LR3 and would continue to be zoned LR3 under action alternatives. Proposed modifications to the LR3 zone standards would allow for the height limit in new buildings to be 40’ instead of 30’. Potential aesthetic impacts are discussed in Section 3.3 Aesthetics.

2. Maintain a distinction between urban center/villages and single-family neighborhoods.

Comment noted. Proposed MHA implementation applies MHA zoning designations with a distinct approach for areas outside of urban villages from areas inside of urban villages. The minimal zoning capacity increases needed to implement MHA are applied in locations outside of urban villages.

3. The location includes nice older buildings. Parking had to be restricted because people from outside the neighborhood were using on street parking while they rode the bus to work.

Comment noted. Section 3.4 Transportation for discussion of potential impacts of the proposal to parking.

Barrer, Carole

1. **The DEIS needs to address how the entire City will be impacted by this proposal and other SEPA analyses, and the DEIS has failed to analyze impact to neighborhoods.**

See frequent comment response concerning impacts to individual urban villages, and frequent comment response regarding impacts to the city as a whole.

Bates, Tawny-1

1. **Extend the DEIS comment period to into September.**

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

2. **Subject fields required by SEPA were not included or passed over lightly.**

Consistent with SEPA policies for an EIS, the DEIS includes a focus on the elements most likely to be impacted by the proposal, as determined through the scoping phase.

3. **The DEIS requires a comprehensive response to identify impact and mitigations.**

Comment noted.

Bates, Tawny-2

1. **The DEIS does not consider multiple alternatives.**

See frequent comment response concerning alternatives that could meet the objective.

2. **The DEIS does not address the full range of health and environmental impacts.**

Consistent with SEPA policies for an EIS, the DEIS focuses on the elements most likely to be affected by the proposal, as determined through the scoping phase. Further responses to detailed comments are provided below.

3. **The DEIS does not evaluate extended daily exposure to toxins or pollutants.**

Potential air quality impacts are discussed in Section 3.9, including construction-related emissions. The Puget Sound Clean Air Agency requires dust and pollution control measures to be applied to construction projects to reduce emissions. Non-compliance is unlawful.

4. Separate environmental review for each urban village should be conducted.

See frequent comment response regarding individual urban village review. The comment states that the DEIS concludes impacts would not be significant. However, significant impacts are identified in Section 3 for several elements of the environment.

5. The DEIS does not identify mitigation strategies appropriate to the intensity of the zone change.

The EIS identifies mitigation measures that could be taken to partially or fully mitigate the impact of the proposed action for each element of the environment studied.

6. The DEIS does not identify mitigation that exists.

As noted, the EIS identifies possible, plausible, mitigation measures that could be taken to mitigate impacts. The information is provided to decision-makers. In some cases, future actions would be required to put in place mitigation measures.

7. The DEIS identifies as mitigation methods ordinances that are outdated.

The DEIS identifies existing codes and regulations that are in effect as mitigation measures in instances where these regulations would mitigate impacts of increased growth. It is not clear from the comment what codes or ordinances are alleged to be outdated.

8. Design Review is identified as a mitigation measure but revisions to it are being proposed.

Section 3.3 Aesthetics notes that changes to design review procedures are being considered. The FEIS updates this section with more current information on potential changes to design review.

9. The DEIS should not conclude no significant impact on tree canopy.

See response to frequent comment concerning tree canopy.

10. Broadband access

The EIS scope focuses on elements of the environment most likely to be impacted. Speed of internet access is not an element of the environment under SEPA that is within the scope of the analysis.

11. Electrical Utility

The DEIS includes information on potential impacts to electrical utility in Section 3.8. Since the DEIS, Seattle City Light provided additional information about potential impacts, and additional discussion is included in the FEIS section 3.8.

12. Waste Disposal

Construction related emissions are discussed under Air Quality in subsection 3.9.2. Amounts of potential demolitions of housing for all alternatives are estimated in section 3.1 Housing and Socioeconomics.

13. Light and Glare

The EIS scope focuses on elements of the environment most likely to be impacted. Existing regulations controlling light and glare would apply to new construction, and would apply under any of the alternatives. The incrementally larger scale of buildings that could occur on any given development site in the action alternatives compared to no action, would not be expected to produce significantly more light or glare compared to the building that could be built under no action, in scenarios where allowed uses are not altered. As discussed in the Land Use Section 3.2.2 Impacts, additional impacts could result in cases where the action alternative would allow for an intensification of allowed land use. In these cases, a greater impact on neighboring properties due to increased light and glare could occur, and that greater impact is considered as part of a land use impact identified as a significant impact in some cases. See Section 3.2 Land Use.

14. Noise

The EIS scope focuses on elements of the environment most likely to be impacted. Existing regulations including the noise ordinance would apply to new construction, and would apply under any of the alternatives. Noise from construction is expected to occur under all alternatives. Many of the potential development sites under the no action alternative that would have construction activity, would also have construction activity of incrementally larger amounts of housing or commercial construction during the 20-year period. In these cases, the duration of construction noise could be longer to complete larger structures, but would not be expected to produce significantly more construction noise than would occur under no action. However, as discussed in the Land Use Section 3.2.2 Impacts, significant impacts could result in cases where the action alternative would allow for an intensification of allowed land use, which could contribute to the likelihood of redevelopment on sites or areas that would not be likely to redevelop under no action. This includes existing single family zoned areas within urban villages or proposed urban village expansion areas. In these areas, there is potential for a greater impact on neighboring properties due to increased potential for construction-generated noise, and that greater impact is considered as part of the land use impact that is identified as a significant impact in some cases. See Section 3.2 Land Use. In the FEIS, additional language is added in the intensification of use discussion within Section 3.2.2 to more clearly acknowledge potential for increased construction noise.

15. Toxins

Construction-related emission are addressed in Section 3.9 Air Quality, including potential vulnerability to impacts for “sensitive receptors” including hospitals, schools, daycares etc. The Puget Sound Clean Air Agency requires dust and pollution control measures to be applied to construction projects to reduce emissions. Non-compliance is unlawful.

Beams, Greg

1. Supportive of proposed changes

Thank you for your comment. Your comment is noted. Please see Chapter 2.0 Description of the Proposal and Alternatives, which includes the preferred alternative.

2. Request that City combine four adjacent parcels owned by the Photographic Center Northwest and change zoning to NC2P-75

Thank you for your comment. Your comment is noted. Please see Chapter 2.0 Description of the Proposal and Alternatives, which includes the preferred alternative, and Appendix H. The preferred alternative includes the requested zone change. Parcel assembly is at the discretion of the owner and may be initiated through separate processes.

Beetem, Jennifer

1. Supports Alternatives 2 and 3; performance requirements are too low to address need

Thank you for your comment. Your comment is noted. Please see frequent comment response concerning *MHA affordable housing requirements*.

2. Affordable housing distribution to all neighborhoods

Thank you for your comment. Your comment is noted. Please see frequent comment responses concerning *MHA affordable housing requirements* and *Location of MHA housing units*. Also see EIS Chapter 2.0 for a description of the preferred alternative including methodology for proposed zone changes.

3. DEIS does not include very recent and, appropriately, unavailable data about low-income residents struggling to afford housing in Seattle. Please talk about this even if the data is not available.

Thank you for your comment. Your comment is noted. Please see expanded race and displacement correlation analysis in EIS Chapter 3.1 Housing and Socioeconomics.

4. In favor of more multi-family housing in all Seattle neighborhoods and 10-minute walksheds

Thank you for your comment. Your comment is noted. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes the preferred alternative and description of the methodology for urban village expansion areas developed during the Seattle 2035 Comprehensive Planning process.

5. Alternatives 2 and 3 balance increased building heights

Thank you for your comment. Your comment is noted. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes the preferred alternative.

6. Density increases and parking; limit RPZ permits

Thank you for your comment. Your comment is noted. Please see EIS Chapter 3.4 Transportation, which includes discussion of RPZ and mitigation measures updating the RPZ program.

Ben

1. The possibility of Single Family homeowners having to pay more taxes based on new allowed use of their property isn't addressed.

Please see additional discussion of potential property tax impacts on single family homeowners under economic displacement in the impacts subsection of Section 3.1 Housing and Socioeconomics in the FEIS.

2. Most of the burden is placed on single family homeowners because they are easy targets. People in proposed upzone areas should have veto power.

Comments noted.

3. Concern about impact of development on infrastructure, particularly sanitary sewer infrastructure.

Comment noted. See frequent comment response concerning public services and utilities.

Bendich, Judy

1. Accessibility and style.

Several copies of the DEIS were made available in hard copy and distributed for free on a first come first serve basis. Additional hard copies were provided at the cost of printing. The DEIS was available for review in hard copy at the Central Library. An open house and public hearing were held on June 29th, 2017.

2. The DEIS fails to address impacts on businesses.

According to the SEPA regulations financial impacts to businesses are outside of environmental review. The DEIS does however include evaluation of certain aspects related to businesses. Commercial development and quantity of jobs that are expected over the study horizon are included for all alternatives for the city as a whole and each urban village. See Chapter 2.0. The Housing and Socioeconomics Chapter 3.1 includes discussion of both cultural displacement and commercial displacement in Section 3.1.2 Impacts. In the Final EIS there is expanded discussion of cultural displacement, including how the displacement of culturally significant businesses can contribute to cultural displacement.

3. DEIS fails to address how affordable units will be built within the urban villages.

See Frequent Comment Response to *Location of Affordable Housing Units*. In the Housing Affordability subsection under displacement in

Chapter 3.1, a key finding is that “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.

See also Frequent Comment Response to MHA affordable housing requirements, concerning the amount of the MHA requirement.

4. The DEIS fails to address impacts and mitigation for each urban village individually.

See Frequent Comment Response concerning Individual Urban Village Review.

5. The DEIS fails to include mitigation requirement congruent with upzoning.

For each section of Chapter 3, the DEIS identifies mitigation measures. The DEIS identifies possible mitigation measures that will at least reduce the adverse environmental impacts of a proposal. Since this is a non-project action with a long timeframe some potential mitigation measures are discussed in general, and would need to be further defined as a part of future actions, but are nonetheless plausible steps that could be taken to mitigate impacts.

6. The DEIS fails to include how the cost of mitigation and basic services will be paid.

Potential mitigation measures are identified for each element of the environment in Section 3. The comment that a source of funding is needed to implement some of the mitigation measures is acknowledged. Impact fees are identified as a possible mitigation measure in the Parks and Open Space section. In the FEIS impact fees for public schools have been added as a possible mitigation measure in the Public Services and Utilities section.

7. The DEIS fails to consider alternatives to upzoning in the Ravenna Areas contiguous to the Roosevelt Urban Village.

The DEIS Action Alternatives 2 and 3, and the Preferred Alternative consider different potential patterns of zoning to implement MHA in the area. See frequent comment response concerning single family zones outside the study area.

8. The DEIS fails to take into account public comments that were made at public meetings before the DEIS was issued.

It is true that the DEIS studied a wider range of MHA zoning change options in Alternative 2 and 3 than were reviewed in public meetings prior to the DEIS issuance. The intent was to better understand a range of potential impacts for the final proposal. The FEIS includes a preferred alternative that reflects information about impacts identified in the DEIS as well as public input received in a variety of formats throughout the multi-year community engagement process. The DEIS Action Alternatives 2 and 3 maps were not the same maps as the draft map that was released for public input and commented on before the DEIS was issued, as stated in the comment.

Community input contributed to formation of the DEIS Action Alternatives. In addition to scoping comments, a series of principles that were based on community input were used to form the DEIS Action Alternatives. Since a broad range of public input was received (See Appendix B Community Input Summary) not all community input can be directly reflected in MHA implementation maps for a specific area or urban village particularly where community perspectives vary. The Preferred Alternative reflects community input gathered throughout the multi-year public engagement process.

See also Frequent Comment Response to Community Engagement.

Benedick, Carol

1. Request for mixed use zoning along 6800 block in NE Seattle

Thank you for your comment. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Areas outside of existing or expanded urban villages generally will not receive changes beyond the M tier. The area in question is outside of an existing urban village or expansion area. The change requested is not part of the current proposal.

Bennett, Vernon C.

1. 5-story apartments next to single family homes is not appropriate.

Thank you for your comment. Comment noted. Please see EIS Chapter 3.3 Aesthetics mitigation measures which includes design and development standards to mitigate bulk and scale impacts.

2. 5-story apartments on a particular block will cause gridlock

Thank you for your comment. Comment noted. Please see EIS Chapter 3.4 Transportation which includes comparison to the No Action Alternative and mitigation measures.

3. Only open space nearby is the golf course

Thank you for your comment. Comment noted. Please see EIS Chapter 3.7 Open Space and Recreation which includes discussion of park resources as well as mitigation measures.

Benson, Max

1. Supports proposal 1 or 2. Status quo is unacceptable.

Thank you for your comment. Your comment is noted. Please see FEIS Chapter 2.0 Description of the Proposal and Alternatives, which includes the preferred alternative.

2. Include sidewalks with development outside of urban villages.

Thank you for your comment. Your comment is noted. Changes to sidewalk requirements outside of urban villages are not part of the proposal, however note that sidewalks are currently required in lowrise zones outside of urban villages, as outlined in SMC 23.53.006.

Berger, Dan-1**1. Extend the DEIS comment period.**

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Berger, Dan-2**1. The DEIS does not provide a comprehensive study of the social and economic impacts to affected neighborhoods.**

Please see Frequent Comment response concerning Individual Urban Village Environmental Review, for a discussion of this issue.

2. The DEIS does not consider the potential physical displacement of family-size households in its analysis of proposed rezones of single family areas in West Seattle Junction Urban Village. Net family housing in impacted areas will likely decrease

Pages 3.53 through 3.61 include an analysis of potential displacement impacts for all three alternatives. It includes estimates of total demolished housing units as well as physically displaced low-income households by Displacement Risk and Access to Opportunity Typology. Because this is a programmatic environmental impact statement, the DEIS does not present results for individual urban villages, as discussed in Frequent Comment response regarding Individual Urban Village Environmental Review. Therefore, a detailed parcel-by-parcel analysis of household characteristics for West Seattle Junction Urban Village is not included.

Due to the great level of uncertainty with regards to which parcels may be redeveloped under each alternative, the DEIS does not estimate the number of demolished housing units by unit size (number of bedrooms) or the potential number of displaced family households living in those units. Also, due to uncertainty, the DEIS also does not estimate the size of new units expected to be built within each urban village. However, the proposed rezones of single family areas in West Seattle Junction Urban Village would add additional capacity for larger family-sized housing within Residential Small Lot (RSL) and Lowrise zones (LR1 and LR2). RSL allows for detached single family homes on smaller lots than currently allowed, and lowrise zones allow for attached multifamily housing such as townhomes and rowhouses that typically include larger units than found in apartment buildings. See Frequent Comment Topic regarding Family Sized Housing, for a more detailed discussion.

3. The Action Alternatives will result in a decrease of housing diversity in the West Seattle Junction Urban Village. [Section A--paragraph 3]

As noted in the previous response, the proposed rezones of single family areas to RSL would add capacity for detached single family housing on small lots. The proposed rezones of single family areas to LR1 and LR2 would add capacity for townhomes and multi-family housing. These changes have the potential to increase the diversity of housing types available in West Seattle.

4. The DEIS does not consider ways in which existing single family areas can provide affordable housing options in owner-occupied homes, including housemates and extended family.

DEIS Page 3.16 through 3.25 provide a detailed discussion of housing affordability in neighborhoods across the city. It finds that housing costs in Seattle are rising rapidly and driven by the strong demand for housing. It also finds that a large and growing percentage of Seattle households are cost burdened. These trends impact the market for single family housing.

DEIS Pages 3.47 through 3.52 discuss the potential impacts of each alternative on housing affordability. In addition, see frequent comment response regarding Family Sized Housing, for a more detailed discussion of the use of MHA funds to increase the supply of income-restricted family-sized housing units. See also frequent comment response concerning Single Family Areas Outside the Study Area.

5. The DEIS lacks specific information regarding the characteristic of impacted sites and adjacent properties.

See frequent comment response concerning Individual Urban Village Environmental Review, for a discussion about why this DEIS does not analyze project-level impacts of potential future development activity within individual urban villages.

6. The DEIS lacks an estimate of the number of people that the action alternatives would displace.

As noted above, DEIS pages 3.53 through 3.61 include an analysis of potential displacement impacts for all three alternatives.

7. The DEIS lacks identification of proposed measures to avoid or reduce housing and displacement impacts.

DEIS pages 3.70 through 3.74 discuss mitigation measures to address housing affordability as well as additional anti-displacement measures.

8. The DEIS lacks proposed measures to ensure that zone changes are compatible with existing and projected land uses and plans.

Potential impacts of the alternatives related to compatibility with existing land use patterns are described on DEIS pages 3.97 through 3.118. Consistency with policies and codes is specifically discussed on DEIS pages 3.108 (Alternative 2) and 3.118 (Alternative 3).

Mitigation measures to address compatibility and other potential land use impacts are described on pages DEIS pages 3.120 through 3.121.

9. The DEIS lacks identification of the approximate number of new housing units provided and the affordability of those units.

DEIS Exhibit 2.7 presents the total number of new housing units estimated to be built over the next 20 years, by alternative for each urban village. DEIS exhibit 3.1-36 on page 3.51 presents the estimated number of new income-restricted affordable units, by alternative for each urban village. These units would be affordable to households earning up to 60 percent of area median income (AMI). The remainder of units would be market rate and therefore pricing would be subject to market demand.

10. The DEIS lacks identification of the number of units that would be demolished under each Action Alternative and the level of affordability of those units.

DEIS pages 3.53 through 3.61 include an analysis of potential displacement impacts for all three alternatives. It includes estimates of total demolished housing units as well as physically displaced low-income households by Displacement Risk and Access to Opportunity Typology. Because this is a programmatic environmental impact statement, the DEIS does not present results for individual urban villages, as discussed in frequent comment response regarding Individual Urban Village Environmental Review. Therefore, a detailed parcel-by-parcel analysis of household characteristics for West Seattle Junction Urban Village is not included.

11. Commercial development are responsible for increasing the demand for affordable housing but are not responsible for mitigation.

As noted on DEIS page 3.47, the proposed MHA-Commercial requirements for commercial zones would require developers to contribute payments to support the development of new affordable housing in Seattle. See Appendix G for more details.

12. Housing affordability will continue to be an issue under all alternatives and there is no proposed mitigation.

Pages 3.47 through 3.52 discuss housing affordability impacts. Implementation of MHA under the Action Alternatives would mitigate housing affordability impacts through the generation of new affordable housing. Increased supply of market-rate housing would likely reduce competition for scarce housing and reduce upward pressure on housing costs.

13. Zoning changes have the potential to increase tax burden and housing costs for existing owners and tenants. Proposed mitigation is only speculative and insufficient.

Thank you for your comment. Additional discussion of housing costs from property tax burden is included in the FEIS Section 3.1 under economic displacement in both the affected environment and impacts subsections of the chapter.

14. The number of new affordable units estimated to be built in West Seattle Junction Urban Village is insufficient.

The commenter may have misinterpreted DEIS Exhibit 3.1-36 on page 3.51. It shows that West Seattle Junction is estimated to receive between 42 and 56 new affordable units within the urban village boundary over the next 20 years under the two Action Alternatives, and 20 unit in Alternative 1 No Action. These units would be a combination of performance and payment units built inside the village boundary. This exhibit does not summarize units generated by new development and built elsewhere in the city.

15. Higher developer costs due to MHA will be passed on in the form of higher market rate housing costs.

On page 3.51 the DEIS acknowledges the potential for MHA costs being passed on in the form of higher rents and housing costs. The DEIS also notes on page 3.48 that market rate housing costs are primarily a result of high demand for scarce housing. Increasing supply of housing is likely to reduce upward housing costs pressures. As noted in the DEIS, the overall impact on market rate housing costs is difficult to predict.

16. West Seattle Junction is incorrectly classified as a high opportunity and low displacement risk neighborhood.

See frequent comment response regarding Displacement Risk, Access to Opportunity Typology, for a discussion of this issue.

17. The MHA affordable housing requirements are too low.

See frequent comment response regarding MHA affordable housing requirements for a discussion of this issue.

Berger, Dan-3

1. The DEIS fails to account and analyze the current housing stock, and does not provide mitigation for displacement of families with children and housing diversity.

See response to Berger, Dan-2, response 1-7, 9, 10.

Berner, Miranda-1

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Berner, Miranda-2

1. **Each Urban Village and surrounding area needs to be analyzed separately, thoroughly and accurately via their own individual EIS.**

See Frequent Comment Response to Individual Urban Village Review.

2. **The DEIS does not address how the whole City will be impacted by the changes both in this DEIS and the other SEPA analyses combined**

See Frequent Comment Response to Citywide Impacts.

Bertolet, Dan (Sightline Institute)

1. **MHA has the potential to improve access to affordable housing if the cost of the affordability requirements is fully offset by the value of the upzones.**

Thank you for your comment, and for the technical articles that your comment is based on. Comments noted.

2. **EIS does not analyze the impact of the MHA affordability requirement on future production of housing.**

The EIS includes housing growth estimates for both new MHA affordable housing units and for market rate housing units. The amount of residential and commercial growth is estimated for a 20-year time period for each alternative. (See Chapter 2.0) In the action alternatives with MHA implementation, over 18,000 more total housing units are estimated for the city as a whole over the 20-year period. Each of the action alternatives are estimated to result in 39 percent more housing growth in the study area compared to no action.

Chapter 3.1 Housing and Socioeconomics discusses the impacts of the additional housing in the action alternatives. The housing affordability subsection states that increasing housing supply has the potential to reduce upward pressure on housing costs and to moderate continued increases in average market rents.

Appendix G includes a description of the methods for the housing growth estimates. For the No Action alternative, the amount of additional housing growth is estimated based on the adopted 20-year growth estimates in the Seattle 2035 Comprehensive Plan. For the action alternatives, with MHA implementation, an amount of additional housing growth beyond the Seattle 2035 amount is estimated for study purposes based on a variety of factors. Relative market strength areas and economic feasibility of development with the proposed MHA requirements are considered in the factors.

As noted, the City commissioned an independent MHA economic feasibility analysis of development with the proposed MHA requirements and capacity increases (Community Attributes, Inc., Economic Analysis of MHA, November 29, 2016). The study found that for a large majority of development prototypes studied,

development economics would be favorable with the MHA capacity increases and requirements, and that development feasibility varied by zone and market area of the city. The study also found that factors other than the MHA requirement are larger determinants of development project feasibility than the affordable housing requirement. Growth estimates for the action alternatives incorporate market strength for different areas of the city by assuming additional development capacity will be used at a faster rate in high market areas, at a medium rate in medium market areas, and at a slower rate in low market areas over the study's time horizon. Market areas are based on Dupre+Scott Advisors independent surveys of market rate rents information.

The CAI report analyzed project feasibility both with and without MHA requirements and found that MHA payment/performance requirements generally did not change the feasibility of development; e.g., in most cases, projects that were infeasible with MHA requirements were also infeasible without MHA requirements. Thus, the analysis referenced in the EIS addresses the effect of MHA requirements on project feasibility and, by extension, housing production.

The CAI report appropriately analyzed feasibility issues for purposes of the EIS analysis of housing production. While analyzing financial return under MHA versus under "existing regulations" (e.g. no development capacity increase and no payment/performance requirements) might be one way of analyzing changes in developer profits, the methodology of the CAI report appropriately addresses whether MHA requirements will affect overall project feasibility in a manner that would call into question the housing production estimates in the EIS.

Many factors affect development feasibility, and economic conditions can be expected to change both citywide and in particular areas of the city over the 20-year time horizon of the EIS. For purposes of estimating housing production, it would be speculative to project, beyond the analysis undertaken in the EIS and CAI report, how overall quantities of housing production over a 20-year time horizon would be affected by changes in economic conditions, including the effect of MHA requirements.

For EIS study purposes, housing growth estimates are provided to conservatively study greater potential impacts of additional growth.

Financial impacts, including developer profits are beyond the purview of environmental review under SEPA. Therefore, the EIS does not include a comparative study of developer profits. Analysis commissioned by the city focuses on the extent to which development would be feasible with the development capacity increases and the MHA affordable housing requirements as proposed.

3. Under the described scenario, MHA would fail in its intended purpose to help solve Seattle's housing affordability crisis.

See response to 1 above regarding the expected effects on housing production. Proposed objectives of the MHA proposal are described in Chapter 2.0 of the EIS. These include increasing overall

production of housing to help meet current and projected high demand, and leveraging development to create at least 6,200 new rent- and income-restricted housing units serving households at 60 percent AMI over a 20-year period. Amounts of rent and income restricted units expected to be produced under each alternative are discussed in Chapter 3.1, and would exceed the objective in all of the action alternatives.

Best, Brooke

1. EIS lacks analysis of an area's history context and patterns of development.

See response to Woo, Eugenia, 1. See also frequent comment response concerning historic resources.

2. The DEIS does not connect MHA to URM.

See response to Woo, Eugenia, 4. Additional discussion of Unreinforced Masonry buildings and related issues is added to the FEIS.

3. The DEIS does not provide substantive mitigation measures.

See response to Woo, Eugenia, 8. Additional detail on potential mitigation measures related to historic resources is included in the FEIS.

Bevis, Carl

1. Prefers No Action Alternative for Wallingford

Please see Chapter 2.0 for a description of the preferred alternative.

2. Modifying codes on existing structures without adding capacity would achieve affordable housing goals

Please see frequent comment response concerning *Alternatives to MHA that could achieve objectives*.

3. Prefers No Action because density increases would degrade conditions

Thank you for your comment, however the comment is not specific enough to respond to.

4. Action Alternatives would impact character of 100 yr. old houses in terms of materials and scale

Please see chapters 3.3 Aesthetics and 3.5 Historic Resources, including discussion of mitigation measures.

5. Action Alternatives would cause gridlock on Wallingford's narrow streets

Please see Chapter 3.4 Transportation for discussion of parking and traffic, including mitigation measures.

6. Action Alternatives would irrevocably erode Seattle's character

Please see chapters 3.3 Aesthetics and 3.5 Historic Resources, including discussion of mitigation measures.

7. Action Alternatives would disrupt wildlife habitat

Please see Chapter 3.6 Biological Resources, including discussion of mitigation measures.

8. Action Alternatives would impact open spaces significantly

Please see Chapter 3.7 Open Space and Recreation, including discussion of mitigation measures.

9. Action Alternatives would increase pollution in Puget Sound from stormwater runoff

Please see Chapter 3.8 Public Services and Utilities, including discussion of mitigation measures.

Blacksher, Erika

1. Supports creating more affordable housing

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes the preferred alternative.

2. Commenter cites a need for creativity in housing types, including live-work

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes the preferred alternative, a goal of which is to increase housing supply and housing choice over what exists today.

3. Cities should be places for diverse communities even if they live in "modern boxes"

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes the preferred alternative, a goal of which is to provide more housing opportunity for households at all income levels, Chapter 3.3 Aesthetics, and Appendix F.

4. The City needs better public transportation so more people can choose transit.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes discussion of the preferred alternative and the strategy to provide more housing capacity near transportation. Please also see Chapter 3.4 Transportation.

Bliquez, Larry

1. Wallingford has done its fair share related to housing affordability because of the buildings on Stone Way.

Thank you for your comment. Comment noted.

2. Any EIS should be specific to our neighborhood.

Please see frequent comment response concerning Individual Urban Village Review.

Bliquez, Pat

1. Each urban village and surrounding area needs to be analyzed separately.

Please see frequent comment response concerning Individual Urban Village Review.

2. The DEIS does not address how the whole city will be impacted.

Please see frequent comment response concerning Citywide Impacts as a Whole.

Bocek, Nancy

4. EIS fails to contain adequate study of cumulative impact of major institution master plans.

Thank you for your comment. Comment noted. See frequent comment response concerning cumulative impacts. Please note that major institution master plans would continue to be the controlling land use regulations for institutional uses within the area of those plans. Proposed MHA implementation will generally not affect potential development outcomes in those areas.

5. EIS fails to study alternatives that could meet objectives.

Comment noted. Please see frequent comment response concerning alternative that could meet the objective.

6. Impacts and mitigations for individual urban villages and the city as a whole are not given adequate consideration.

Please see frequent comment response concerning Individual Urban Village Review. Please see frequent comment response concerning Citywide Impacts to the City as a Whole.

7. MHA development examples do not show Lowrise 1.

Appendix F, pages 20 – 25 of the Urban Design and Neighborhood Character study depict Lowrise 1.

8. The DEIS does not meet the requirement for alternatives.

Please see frequent comment response concerning alternative that could meet the objective.

9. The MHA-R Framework did not undergo environmental review.

Please see comment response to Raaen, Lee.

Bondra, Michael

1. Prefers Alternative 2 for uniform distribution of affordable housing across urban villages

Please see Chapter 2.0 for a description of the preferred alternative and frequent comment response concerning location of MHA housing units.

2. Providing fast and reliable public transit should be a high priority

Please see Chapter 3.4 Transpiration.

Boothby, Mimi

1. Beacon Hill new development will not have enough affordable housing or parking

Thank you for your comment. Your comment is noted. Note that the DEIS is a programmatic document designed to assess impacts at a citywide scale. Detailed evaluation of effects of planning-level alternatives in specific locations would depend on site-specific information. Evaluation of these impacts is best done at the project level through site-level SEPA review or the building permit process, as described on DEIS page 3.165.

Please also see frequent comment response concerning *Impacts to Street Parking*, and Chapter 2.0 Description of the Proposal and Alternatives for a description of the preferred alternative, including MHA affordable housing goals.

2. Beacon Hill new development will not provide enough parking or transit capacity.

Please see comment response above as well EIS Chapter 3.4 Transportation for discussion of transit impacts and mitigation measures. It is worth noting that Beacon Hill has a Light Rail station, among the highest quality transit types available in Seattle.

3. Concern about density correlating with open space and transportation congestion

Please see EIS chapters 3.4 Transportation and 3.7 Open Space and Recreation including discussion of mitigation measures.

Borwick, Charles

1. Concern about density in neighborhoods.

Thank you for your comment. Comment noted.

Bosch, Amy

1. Commenter is not in favor of Action Alternatives, cites traffic as a concern

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as the Growth with Livability report.

2. Concern about socioeconomics

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

3. Concern about land use

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures.

4. Concern about durability of building materials in new development

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as mitigation measures.

5. Concern about traffic and livability

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as the Growth with Livability report.

6. Concern about loss of historic structures

Please see EIS Chapter 3.5 Historic Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Analysis of historic resources*.

7. Concern about the environment

Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

8. Concern about overcrowding of open space

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures.

9. Concern about utility rates increasing

Please see EIS Chapter 3.8 Public Services and Utilities for discussion of impacts and mitigation measures.

10. Concern about air quality and greenhouse gases

Please see EIS Chapter 3.9 Air Quality and Greenhouse Gas Emissions for discussion of impacts and mitigation measures.

Boyd, Dianne

1. The commenter shares concerns about parking conditions on a specific block in Morgan Junction.

This is a programmatic DEIS address area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects that will be required are also unknown. Individual development projects will undergo separate and more detailed SEPA review during which specific impacts and mitigation (including on-street parking) will be determined. Seattle Municipal Code 25.05.675.M.2.b expressly exempts on-street parking impact mitigation for new residential development within “portions of urban villages within 1,320 feet of a street with frequent transit service.” This exception covers much of the area affected by the MHA proposal. Any areas not covered by that provision would be subject to mitigation during the project review.

2. There are impacts to emergency vehicles and utility vehicles, and a lack of visibility for pedestrians.

The City of Seattle has policies and parking regulations that relate to the commenter’s concerns regarding parking near pedestrian crossings. The commenter is encouraged to contact SDOT if there are enforcement issues that need to be addressed. Regarding emergency vehicle access, Seattle has long had narrow streets with on-street parking served by emergency vehicles. SDOT works closely with the Fire Department to maintain access to properties throughout the city. The Fire Department had the opportunity to comment on this EIS and had no comments on emergency vehicle access impacts related to the proposed legislative action.

3. Concern about the creation of more housing, and the impact of density on neighborhoods.

Thank you for your comments. Comments are noted. For a discussion of the effects of additional housing see Section 3.1 Housing and Socioeconomics. For a discussion of land use impacts including potential land use impacts from increased density see Section 3.2 Land Use.

Boyd, Sugiki

1. The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

Boyer, Cynthia

1. Comments on Alternative 3.

Thank you for your comment. Comments noted. For a discussion of bus service, parking, see Section 3.4 Transportation. For discussion of stormwater drainage see Section 3.8 Public Services and Utilities.

2. Comments on Alternative 2.

Thank you for your comment. Comments noted.

3. Do not include 20th Ave. NW, north of 85th St. within the Crown Hill Urban Village.

Thank you for your comment. Comments noted. See Preferred Alternative map for the Crown Hill Urban Village at Appendix H. In recognition of the unique roadway constraint, the street is not included within the urban village in the Preferred Alternative.

4. Do not include 20th Ave. NW, north of 85th St. within the Crown Hill Urban Village.

Thank you for your comment. Comments noted.

Braybrooks, Julie

1. Supports comments and conclusions of the Madison Miller Park Community Group.

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Bree, Jackie

1. With the substantial amount of residential development in West Seattle how many affordable apartments units have been built.

The MHA program represents a new mechanism to require that new development provide for affordable housing. In West Seattle, this program has provided no new units because it has yet to be implemented in West Seattle. For a discussion of the number of units developed, affordability levels, and number of affordable units that application of MHA is expected to produce see Chapter 3.1 of the Draft EIS: Housing and Socioeconomics.

2. Concern regarding potential for increased parking and traffic.

For a discussion of parking impacts, please refer to the frequent comment response titled Parking Impacts and Mitigation. The Draft EIS Transportation section considers traffic impacts with and without application of MHA. Please refer to Chapter 3.4 of the Draft EIS: Transportation.

3. Redraw the Junction Urban Village Boundaries back to the original Urban Village plan.

Comment Noted. See proposed urban village boundary expansion maps in Chapter 2, Urban Village Expansion Areas. See also Appendix H maps of each urban village.

4. Please preserve our neighborhood plan that plans for growth but preserves livability.

Comment noted.

5. Location of historic resources in urban villages

The term affected environment refers to the existing condition that provides a baseline for analysis of potential impacts of alternatives in the EIS. The purpose of the EIS is to provide information to decision-makers about how the proposed action could impact the environment including historic resources. It is true that urban villages were designated in the 1990's, long

Brennan, Alex (Capitol Hill Renter Initiative)

1. Background on the work of the Capitol Renter Initiative, a grassroots group of renters living on Capitol Hill.

Thank you for your comments on the EIS, and your work to address the city's affordability challenges.

2. Generally prefers Alternative 2.

Comment supports larger upzoned areas from lowrise to midrise, east of Broadway. Comment noted. Please see description of the Preferred Alternative approach in the FEIS in Chapter 2, and the Preferred Alternative map at Appendix H. Note that the Preferred Alternative focuses greater capacity increases within a 5-minute walkshed of frequent transit nodes in Capitol Hill, due to high displacement risk.

3. Disappointed urban village boundaries can't be extended further north to Volunteer Park and east to Madison-Miller.

Comment noted. Urban village boundaries studied in the Seattle 2035 planning process are considered for expansion in the EIS. Please see frequent comment response concerning single family areas outside of urban villages.

4. Maintain an incentive for preservation in the Pike Pine Conservation Overlay District (PPCOD)

Comments noted. Under action alternatives MHA would be implemented in the PPCOD. Development standards would be tailored to ensure continued incentive for builders to preserve character structures, consistent with the intent of the existing PPCOD. City staff held discussions during the development of MHA with Pike Pine area stakeholders familiar with the PPCOD. A development standard proposal that strengthens the effect of the PPCOD is proposed as an integrated component of MHA implementation. (See Appendix F).

5. Increase heights and ground floor retail adjacent to the Madison Bus Rapid Transit Corridor.

Comments noted. Please see description of the Preferred Alternative approach in the FEIS in Chapter 2, and the Preferred Alternative map at Appendix H. Consideration is given in the Preferred Alternative to apply relatively greater capacity increases to known sites that are expected for development as affordable housing, including those noted in the comment.

6. Generally supportive of Alternative 3 for Madison-Miller.

Comments noted. Please see description of the Preferred Alternative approach in the FEIS in Chapter 2, and the Preferred Alternative map at Appendix H.

7. Generally supportive of the Alternative 3 approach for citywide MHA implementation alternatives.

Comments noted. The Preferred Alternative includes aspects of Alternative 3.

8. Greenhouse gas emission and climate impacts.

The comment states that the DEIS underestimates the climate change benefit of Alternative 2 and 3 relative to No Action. Comment noted.

9. Use more accurate subsidized housing data in the analysis of displacement.

Comments noted. Please note that the FEIS includes updated subsidized housing data in this analysis based on a comprehensive set of records provided by the Office of Housing.

10. Addressing race and displacement.

Comments noted. Please note that the FEIS includes additional correlation analysis exploring the relationship between development and changes in various racial populations.

11. Displacement risk index.

Please see frequent comment response concerning the Growth and Equity Analysis.

12. Coordinated citywide upzone.

Comment states that a broad citywide upzone to implement MHA could lead to lesser land value increases than if upzoning individual areas or parcels. The comment is noted.

13. Types of buildings.

Comments noted.

14. Tenant Relocation Assistance.

Comments noted. While TRAO provides valuable data for analyzing direct displacement there are limitations as noted, because records are not currently collected on where recipients move to. Please see also suggested mitigation measures related to TRAO in Section 3.1.

15. Regional data and more recent data.

Comments noted. The most recent available data at the time of analyses is incorporated in the EIS.

Bricklin, David

1. Analysis discloses impacts. Mitigation is insufficient.

Thank you for the comment. Responses to the concerns related to impacts and mitigation are provided for specific topics below.

In addition to response provided below, see also response to Holliday, Guy.

2. Description of area of interest to commenters.

Thank you providing context and description of the area.

3. Alternative 2 best represents the comments and proposal submitted.

Thank you for your comment, it has been forwarded to decision-makers. Please see the preferred alternative map for the Madison-Miller urban village in Appendix H. MHA implementation under the preferred alternatives would include development capacity increases that are different than Alternatives 2 and 3 in ways that are responsive to issues identified in your letter.

See also Holliday, Guy, comment response 7 concerning zoning increases across different urban villages.

4. The Design Review process is not adequate mitigation because much development under the proposal would be exempt from Design Review.

As described on DEIS pages 3.128 through 3.130, Seattle's Design Review Process applies to new development that meets specific thresholds based on zoning, size (number of dwelling units or floor area), and location. Single-family homes are exempt from Design Review, but the process currently covers most new multifamily, commercial, and mixed-use development, and would continue to do so under the MHA alternatives. As described in the Section 3.3, the possible amendment of the Design Review process has not been finalized, however the FEIS includes updated discussion of proposed amendments to Design Review, and those amendments are considered in the analysis. Because the Design Review process does exempt single-family and small multifamily, commercial, and mixed-used development, it is not the sole mitigation measure described in the EIS.

- As described on DEIS pages 3.164 and 3.165, the action alternatives would amend the development code to add new design standards in Lowrise 1, Lowrise 2, Lowrise 3, and Midrise zones, which are the zones mostly likely to experience multifamily development exempt from Design Review.
- The action alternatives would also implement increased setbacks in NC zones where adjacent to residential zones.

- The EIS recommends as potential mitigation, further modifications to the Design Review process to expand the types of development subject to the process. This includes specific consideration in the design review thresholds for areas that would receive an increase in zoning from a single-family zone with MHA implementation.
- The action alternatives would also implement new tree planting requirements in the Residential Small Lot zone, which would mitigate aesthetic impacts of development.

Since design is subjective, differing opinions are inevitable about the extent to which design review effectively mitigates aesthetic impacts, and leads to avoidance of discordant designs, in new development.

5. Proposed mitigation for impacts to historic resources is vague and would not adequately protect historic architecture in neighborhoods.

See frequent comment response concerning Historic Resources for discussion of this issue. See also response to Woo, Eugenia.

6. Aesthetics visualizations do not accurately portray the impacts of additional development.

The Aesthetics visualizations in DEIS Exhibits 3.3-12 through 3.3-15 depict a continuum of potential redevelopment scenarios. A common viewpoint was chosen for these exhibits to provide consistency, and the visual effects of infill development can be seen if all four exhibits are viewed as a series. While a direct, side-by-side comparison between new development and existing single-family homes would provide a clearer picture of impacts on individual properties, the chosen approach allows the EIS analysis to evaluate overall character of the street. For example, Exhibit 3.3-13 shows new (M1) tier development adjacent to a pair of single-family homes, and Exhibit 3.3-14 and 3.3-15 show the potential increases in size in bulk that could occur as those two homes incrementally redevelop to the intensity allowed by proposed development regulations. Taken together, the four exhibits depict the redevelopment and conversion process for neighborhood as a whole. In addition to the specific static visualizations included as exhibits in the DEIS document, preparers of the analysis had access to additional angles and views through use of 3D modelling software to inform conclusions.

7. Proposed Aesthetics mitigation is vague and inadequate.

The EIS describes mitigation measures that are included in the proposal to offset potential impacts of new development, specifically building setbacks, façade treatments, and building envelope modulation to reduce visual bulk. The EIS also includes recommended mitigation measures to further reduce potential impacts, including new design guidelines, modifications to the thresholds for the Design Review process, and new requirements for protecting views and preventing adverse shading effects.

While these measures are not currently required, the EIS explicitly states that without implementation of these or similar measures, significant adverse impacts may occur. As part of the SEPA process,

this information is provided to City decision makers for their consideration in the design of the Final EIS Preferred Alternative. The Final EIS includes a description of the Preferred Alternative and associated mitigation measures, including a more detailed description of the proposed privacy standards.

8. Parks and open space impacts are not disclosed and mitigation is not provided.

The EIS describes the indirect impacts to parks and open space that would occur from growth under all three alternatives. See Section 3.7.2. Mitigation measures are identified in Section 3.7.3 that could plausibly mitigate the identified impacts over the 20-year planning horizon. In the FEIS additional specificity about parks and open space mitigation measures is provided. See also Holliday, Guy response 14 concerning open space.

9. Public Services.

See Section 3.8 for discussion of stormwater drainage. Development regulations require certain developments to improve or pave alleys when development occurs on a lot abutting an alley. The requirements for alley improvements would apply under all alternatives. Existing regulations for the design, location and access to refuse collection in new buildings would apply under all alternatives. In new multi-family developments refuse collection areas are required to be enclosed within a building or screened from view, and development standards for curb ramps that allow for access to refuse collection are proposed to be strengthened at the time of MHA implementation in the study area.

10. Parking.

See frequent comment response concerning Parking Impacts and Mitigation.

11. Developers will benefit financially from the proposal to implement MHA.

See Frequent Comment Response, MHA affordable housing requirements, and Bertolet, Dan (Sightline Institute) comment response.

12. Map.

See Preferred Alternative map for the Madison-Miller urban village in Appendix H, which includes zone designations to implement MHA that are responsive to your comments.

Brooks, Kyle

1. Reduce zoning restrictions in high-income neighborhoods

Please see frequent comment response concerning *Single Family zones outside the study area*.

2. Preference for big buildings over cars

Please see EIS Chapter 3.3 Aesthetics and Chapter 3.4 Transportation.

3. Request to eliminate street parking on Aurora Ave N to allow for bus lanes

Thank you for your comment. Your comment is noted; however, it is not specific to the proposal or its environmental analysis. Please see EIS Chapter 3.4 Transportation as well as the Growth with Livability report.

Brothers, Cynthia

1. Extend DEIS comment period

Thank you for your comment. Comment noted.

2. Displacement analysis is incomplete; consider economic displacement

Please see frequent comment response concerning *Displacement analysis*.

3. Conduct analysis that includes varying impacts to race and ethnic groups

Please see frequent comment response concerning *Impacts on racial and cultural minority groups*.

4. Preserve existing affordable housing stock

Please see EIS Chapter 3.1 Housing and Socioeconomics as well as the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses payment dollars to fund acquisition and rehabilitation of existing housing.

5. TOD needs to include racial justice

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

6. More resources for historic preservation for community use

Please see EIS Chapter 3.5 Historic Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Analysis of historic resources*.

7. More green space for high risk of displacement areas

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures.

Brown, Scott

1. **Request to change zoning on a block west of Ballard urban village, citing multiple community benefits, area history, and rationale. Request to include this change in all Action Alternatives.**

Thank you for your comment. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Existing multifamily and commercial areas outside existing or expanded urban villages are generally not proposed for zone changes beyond the M tier. Single family areas outside existing or expanded urban villages are not proposed for zone changes. The area in question is a single family area outside of an existing urban village or expansion area. The change requested is not included in the preferred alternative.

Browning, Chris

1. **Supports comments and conclusions of the Madison Miller Park Community Group.**

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Browning, Liz

1. **Supports comments and conclusions of the Madison Miller Park Community Group.**

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Bubelis, Walt - 1

1. **Please extend the comment period until August 28.**

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Bubelis, Walt-2

1. **EIS should address urban villages individually.**

Please see frequent comment response concerning Individual Urban Village Review.

2. The EIS does not adequately address the city as a whole.

Please see frequent comment response concerning Citywide Impacts to the City as a Whole.

Buckley, Christopher**1. Prefers Alternative 3 for the Roosevelt Urban Village to reduce sprawl and encourage economic diversity.**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, including the preferred alternative, which shows a mix of Residential Small Lot and Lowrise 1 zoning along NE 65th St where the zoning is currently single family.

Bucy, Katie-1**1. Extend the DEIS comment period.**

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Burco, Greta**1. DEIS fails to recognize existing overcrowded neighborhood schools.**

Please see frequent comment response regarding analysis of impacts on Seattle Public Schools. The FEIS includes additional analysis of potential impacts on public schools, and additional coordination with Seattle Public Schools was conducted between DEIS and FEIS.

2. DEIS fails to acknowledge lack of adequate infrastructure in the West Seattle Junction.

Please see Section 3.8 Public Services and Utilities. Please also see response to the Tobin-Presser, Christy-2, which includes specific responses regarding infrastructure.

3. West Seattle Junction will not gain meaningful affordable housing in exchange for upzones.

DEIS Section 3.1 Housing and Socioeconomics includes estimates for quantities of rent and income restricted affordable housing that would be produced under all alternatives. Please also see discussion in frequent comment response Location of MHA Affordable Housing.

4. DEIS fails to take into account the current lack of access to emergency services in the proposed rezone areas.

Please see Section 3.8 Public Services and Utilities for a discussion of emergency services. The MHA proposal is a non-project action, and the EIS addresses impacts at a programmatic level. It is appropriate for some potential impacts to be discussed in a

generally. At the time of future project specific actions, potential impacts of specific developments, such as access at specific locations by emergency services vehicles would be reviewed for projects requiring SEPA review.

5. DEIS fails to take into account West Seattle Junction neighborhood feedback.

Community input contributed to formation of the DEIS Action Alternatives. In addition to scoping comments, a series of principles that were based on community input were used to form the DEIS Action Alternatives. Since a broad range of public input was received (See Appendix B Community Input Summary) not all community input can be directly reflected in MHA implementation maps for a specific area or urban village particularly where community perspectives vary. The Preferred Alternative reflects community input gathered throughout the multi-year public engagement process. See also frequent comment response concerning Community Engagement.

6. West Seattle Junction neighborhood plan is not honored.

See subsection 2.2 Planning Context, and Relevant Policies and Codes in Section 3.2 for discussion. Please also note that modification of certain policies in the Neighborhood Plans section of the Comprehensive Plan, concerning single family zoning in urban villages is considered as a part of the proposal for which impacts are analyzed.

Bucy, Katie-2

1. The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

Burco, Greta

1. DEIS fails to recognize existing overcrowded neighborhood schools.

Please see frequent comment response regarding analysis of impacts on Seattle Public Schools. The FEIS includes additional analysis of potential impacts on public schools, and additional coordination with Seattle Public Schools was conducted between DEIS and FEIS.

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See subsection 2.2 Planning Context, and Relevant Policies and Codes in Section 3.2 for discussion. Please also note that modification of certain policies in the Neighborhood Plans section of the Comprehensive Plan, concerning single family zoning in urban villages is considered as a part of the proposal for which impacts are analyzed.

Burke, Susan

1. Supports comments and conclusions of the Madison Miller Park Community Group.

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Burnstein, Daniel

1. **Shares concern about loss of heritage and cultural attributes from demolition of pre-World War II built environment. The DEIS did not adequately address the historic fabric of individual structures and neighborhoods.**

Thank you for your comment. Comment noted. Please see frequent comment response concerning Historic Resources. Please see also response to Woo, Eugenia.

Bush, Rhonda 1

1. **The EIS does not recognize and examine unique features of each urban village. Each Urban Village is unique, with different housing types, cultural traditions, businesses, resources, and growth needs. Each urban village should have an individual environmental review.**

Please see the answer in the frequent responses for Individual Urban Village Environmental Review.

2. **The EIS does not adequately address the city as a whole.**

Please see frequent comment response concerning Citywide Impacts to the City as a Whole.

Bush, Rhonda 2

1. **The comment period for the Draft EIS was not long enough to review and comment.**

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Bush, Rhonda-3

1. **The language in the MHA DEIS is misleading and describes the changes MHA would allow in different zones as 'slightly' larger.**

Comment noted. As described in the Land Use Chapter of the Draft EIS (Chapter 2), most proposed zoning capacity increases would allow approximately one additional story of development compared to what existing zoning allows. Seventy-three percent of the proposed MHA development capacity increases in alternative 2 and seventy-seven percent of the capacity increases in Alternative 3 would fall into this category of capacity increases. The MHA zoning suffixes represented by M, M1, or M2 represent the value of the capacity increase and establishes a corresponding requirement for affordable housing. Those rezones that fall into the category of a standard increase (approximately one additional story) would receive an M designation that would establish number of affordable units that

must be built or the amount of fees that must be paid into an affordable housing fund.

Bush, Rhonda-4

- 1. Environmental review should be conducted for each urban village individually.**

Please see frequent comment response concerning Individual Urban Village Review.

Cain, Julie

- 1. Request to adopt Alternative 3 zoning for the area at the northwest corner of NE 72nd Street and 5th Avenue NE.**

Comment noted. Please refer to the preferred alternative described in Chapter 2 of the Final EIS, and maps at Appendix H, to see the zoning recommendation that will be considered by the City Council.

Campbell, Elizabeth

- 1. The city has failed in its outreach efforts.**

Comment noted. Please refer to frequent comment response concerning community engagement. Please see also Appendix B summary of community input.

- 2. The Magnolia Community Council does not represent people in Magnolia and others in the neighborhood do not agree with the Community Council's input.**

Comment noted. All comments from individuals and varied neighborhood groups are considered and are valuable input.

- 3. There is no urban village in Magnolia and MHA shouldn't be implemented there.**

Comment noted. Under the action alternatives only areas in existing commercial or multifamily zoning would have MHA implementation in Magnolia, consistent with the approach for areas outside of urban villages.

- 4. Offensive process. The Magnolia Neighborhood Planning Council opposes MHA implementation.**

Comments noted.

Capitol Hill Happy Dog

- 1. Equity and social justice premise is flawed due to continued protections for single family areas**

Please see frequent comment response concerning Single family zones not in the study area. Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing

correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning Impacts on racial and cultural minority groups and Displacement analysis. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

2. Concern for displacement of Capitol Hill residents

Please see response to comment 1 above.

3. Concern about payment option and location of affordable housing built with payment funds

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock throughout the city.

4. Commenter does not agree with statements about cost of housing in high risk high opportunity neighborhoods

Thank you for your comment. Your comment is noted. The statement on DEIS p. 2.11 about high displacement risk high access to opportunity areas is a generalization that does capture conditions within many of these neighborhoods. There are outliers, such as Capitol Hill, which has relatively high rent compared to the city as a whole. That said, the variety of housing types within this neighborhood, including abundant apartments and plexes, provides a greater range of cost options than do other areas that have fewer housing types.

5. Concern about HALA process

Thank you for your comment. Your comment is noted, however it is not specific to the analysis and so no response is provided.

6. Commenter disagrees with statements about reach of community engagement process

Please see EIS Appendix B for a discussion of the MHA community input process and a summary of input received. Please also see frequent comment response concerning community engagement.

7. Concern about lack of displacement mitigation measures

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods as well as mitigation measures. Please also see frequent comment responses concerning Impacts on racial and cultural minority groups and Displacement analysis. Please also see EIS Appendix C MHA Implementation Principles, which include “9.

Evaluate MHA implementation using a social and racial equity/justice lens.”

8. Areas with assets and infrastructure have been left out of the plan

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see discussion of urban village boundary expansion areas identified in the Seattle 2035 Comprehensive Planning process. Please also see frequent comment response concerning *Single family zones not in the study area*.

9. Concern that family friendly principle is in conflict with proposed zone changes

Note that the proposal includes family-size unit requirements for both market rate and affordable housing performance. Also note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

10. Concern that scale of development capacity increases principle is in conflict with proposed zone changes

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as mitigation measures. Please see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

11. Commenter notes they have withheld name and contact information for fear of retribution

Thank you for your comment. Your comment is noted. The City is committed to championing social justice, civil rights, and sound democratic processes. If you feel these standards have not been upheld through this process we encourage you to contact the Office for Civil Rights and make a complaint:

<https://www.seattle.gov/civilrights/file-complaint>

Carson, Mel

1. Please extend the draft EIS comment period to 90 days.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Casey, Tanya

1. **The comment opposes housing for the homeless in Discovery Park, and expresses a desire for a public school at Fort Lawton.**

Thank you for your comment. Discovery Park and Fort Lawton are outside the study area for this proposal. Potential changes to land use at Fort Lawton may be evaluated through a separate planning process with environmental review.

2. **Coordination with Seattle Public Schools.**

Please see frequent comment response concerning coordination with Seattle Public Schools and potential impacts to public schools. The FEIS includes additional discussion and analysis of public schools in Section 3.8 Public Services and Utilities.

Cave, Donn-1

1. **Renderings of RSL structures should not have peaked roofs. Codes favor flat roofs.**

Renderings of RSL structures in the DEIS Section 3.3 include a mix of flat roof and peaked roof structures. Both are potential outcomes in the design of new structures in the proposed zone. Proposed zoning standards for MHA implementation in the RSL zone include height allowances for pitched roofs. A lower FAR limit in the RSL zone (0.75) compared to Lowrise zones (1.3 and greater), is expected to result in more variety of roof forms in the RSL zone than is typically seen in Lowrise zone development.

Cave, Donn-2

1. **The EIS should clearly note thresholds for design review exemptions.**

DEIS Exhibit 3.3-6 identified the existing design review thresholds at the time of writing. The FEIS includes updated information on proposed changes to design review thresholds in Section 3.3, that could occur through separate action. The EIS recommends as potential mitigation, further modifications to the Design Review process to expand the types of development subject to the process. This includes specific consideration in the design review thresholds for areas that would receive an increase in zoning from a single-family zone with MHA implementation.

Cave, Donn-3

1. **Identified parking mitigation measures would make parking impacts more severe.**

Please see frequent comment response concerning Parking Impacts and Mitigation.

Cave, Donn-4

1. **It should be more clear what strategy related to the RPZ program would be deployed.**

The DEIS states that the Restricted Parking Zone (RPZ) program could be revised. These include: splitting existing RPZs into multiple zones; adding new RPZ zones where they do not currently exist; adjusting RPZ boundaries; and revising policies in areas that are oversubscribed. The last suggestion would be implemented by limiting the number of RPZ permits issued, or making changes to the pricing structure of RPZ permits such that prices would be calibrated depending on the demand for on street parking in an area. However, details of how changes in permit allocation would be implemented would be determined by SDOT through additional analysis and policy review.

Cave, Donn-5

1. **Give distinct consideration for evergreen or coniferous trees in analysis of tree canopy.**

Thank you for the comment. Additional language has been added in subsection 3.6.3 for potential mitigation measures for tree canopy.

Cave, Donn-6

1. **Statements in the DEIS about how fire and emergency services demand would be managed are incorrect.**

Thank you for the comment. The Seattle Fire Department reviewed and provided input on the DEIS Public Services and Utilities Section.

Cave, Donn-7

1. **The EIS should use a different measure of Police service than average response time.**

Thank you for the comment. Average response time is the standard metric used by the Seattle Police Department, and for level of service standards.

Cave, Donn-8

1. **Analysis of access to opportunity should favor light rail connectivity over proximity.**

Metrics determining the access to opportunity and displacement risk of urban villages is described in Appendix A. The index for access to opportunity is based on 13 indicators, and proximity to bus transit, and proximity to light rail are separate indicators. Therefore, access to light rail is given additional weight in the index.

Cave, Donn-9

The EIS analysis of impacts to views and shading effects should be more specific.

As described in Frequent Comment Topic regarding Individual Urban Village Review, the DEIS is a programmatic document designed to assess impacts at a citywide scale. Detailed evaluation of effects of planning-level alternatives on specific views or shading effects in specific locations would depend on site-specific information not yet available, such as building footprints, heights, and locations. Evaluation of these impacts is best done at the project level through site-level SEPA review or the building permit process, as described on page 3.165.

Cave, Donn-10

- 1. The EIS should provide more detail on how mitigation to the parks and open space impact would be achieved.**

Thank you for your comment. The FEIS includes modified and additional language in the mitigations portion of the Parks and Open Space section 3.7.

Cave, Donn-11

- 1. The EIS should consider the role of traffic congestion in their impact on Fire Department emergency and fire-fighting response.**

Fire and EMS response impacts are discussed in Section 3.8. Traffic congestion impacts from the alternatives as measured at travel screenlines is analyzed in Section 3.4 Transportation. Traffic impacts identified in Chapter 3.4 for the action alternatives do not alter the conclusions in Section 3.8.

Cave, Donn-12

- 1. The EIS should consider local impacts on school capacity.**

See frequent comment response concerning Seattle Public Schools analysis. The FEIS includes additional analysis in Section 3.8 related to public school capacity.

Cave, Donn-13

- 1. The EIS should consider various effects of construction including noise and a range of particulates.**

See response to Bates, Tawny-2, comments 2,3,13,15.

Cave, Donn-14

1. **The EIS should consider levels of compliance with regulatory standards in the study area.**

The commenter provides an example of asbestos mitigation during demolition, which would be controlled by the Puget Sound Clean Air Agency's Article 9, Section 9.15. The Puget Sound Clean Air Agency requires these dust control measures be applied to construction projects to reduce these emissions. Non-compliance is unlawful.

Cave, Donn-15

1. **Renderings depicting aesthetic impacts should place views of new development side by side with existing structures.**

See comment response to Bricklin, David comment 6.

Cave, Donn-16

1. **The EIS should provide more neighborhood specific analysis.**

Please see frequent comment response regarding Individual Urban Village Review.

Celeste

1. **Each area needs its own study**

Please see frequent comment response concerning *Individual urban village review*.

2. **Information needs to be sent in multiple languages**

Please see frequent comment response concerning *Community engagement*. Please also see EIS Appendix B for a discussion of the MHA community input process and a summary of input received, as well as proposed zone changes guided by community input.

3. **Each area needs its own study**

Please see response to comment #1 above.

4. **Concern about building conditions in South Park and illegal dumping**

Thank you for your comment. Your comment is noted, however it is not specific enough to the environmental analysis and so no response is provided.

5. **Interest in more public transportation**

Please see Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

6. Interest in cleaning up biological resources

Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures.

7. We have enough open space and recreation

Response to the frequent comment here.

Cerceo, Mike

1. Concern about impacts of multifamily zones included in current single family areas; concern about traffic, parking, noise, views, and safety

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle's single family zoned land.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, which include family-size housing types such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas, allows for more family-size and family-style housing, and likelihood of expanded ownership options, in areas that are currently zoned single family.

Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as Relevant Plans and Policies. Please see frequent comment response concerning *Impacts to parking*. Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures.

2. Concern about transportation impacts and lack of a coordinated plan

Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as Relevant Plans and Policies.

Chan, Sabina

1. Proposed land use impacts in the block of Wallingford Ave. N. considered for MHA implementation with a Lowrise 2 (M1) designation in Alternative 2 should greater than described in the text.

Thank you for your comment. Additional language is added in the FEIS Section 3.2 Land Use in the impacts section for the Northgate urban village discussing potential land use impact on the block.

2. Maintain a transition between larger scale land uses east of the block and the area outside of the Northgate urban village.

Thank you for your comment. Comment noted. Please see the Preferred Alternative, which would include MHA implementation with the Residential Small Lot zone designation, which would provide a

transition at the edge of the urban village, and includes height limits and development standards more similar to the existing single family land use, than Alternative 2 for the block discussed in the comment.

Chapman, Paul

1. Prefers Alternative 3, but study ways of increasing housing production further; expand Wallingford urban village boundary

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see discussion of urban village boundary expansion areas identified in the Seattle 2035 Comprehensive Planning process.

2. Concern about family size units, citing need for more. EIS has not sufficiently studied need for family-size units, changes to single family zoning, ownership options, impacts of speculation. Study additional measures.

Please see frequent comment responses concerning *Market rate and affordable family-size housing units, Alternatives to MHA that could achieve objectives, MHA affordable housing requirements, and Single family zones outside the study area.*

Please also note that Lowrise 1 as proposed includes a family-size requirement, as does the MHA performance option.

3. EIS should study boundary expansion in Wallingford, rezoning all single family in Seattle, and increasing Northgate to M2 zone changes and increase height limits.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see discussion of urban village boundary expansion areas identified in the Seattle 2035 Comprehensive Planning process. Please also see frequent comment response concerning *Single family zones outside the study area.*

4., 5., and 6. Consider additional policy options beyond the Action Alternatives.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes, as well as frequent comment response concerning *Alternatives to MHA that could achieve objectives.*

7. Concern for sidewalk standards and stormwater runoff

Please see EIS Chapter 3.4 Transportation, including mitigation measures discussing potential development requirements for sidewalks. Please see frequent comment response concerning *Impacts to stormwater infrastructure.*

8. Concern about impacts on open space.

Please see EIS Chapter 3.5 Open Space and Recreation, including mitigation measures.

9. Concern for impacts on schools, stormwater management, and internet utilities.

Please see frequent comment responses concerning *Analysis of impacts to Seattle Public Schools*, *Impacts to stormwater infrastructure*, and

The EIS scope focuses on elements of the environment most likely to be impacted. Speed of internet access is not an element of the environment under SEPA that is within the scope of the analysis.

10. EIS must study impact of efforts to reduce SOV trips and include more mitigation measures.

Please see EIS chapters 3.4 Transportation and 3.9 Air Quality and Green House Gasses for a discussion of transportation impacts including SOV trips as well as mitigation measures.

Charlotte

1. Concern that Alternative 2 urban village expansion is too aggressive for Othello, concern about displacement, prefers Alternative 3

Thank you for your comment. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix H Zoning Maps.

Please also see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

2. Supports zone changes in N Seattle and Capitol Hill

Thank you for your comment. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix H Zoning Maps.

3. Concern about displacement, particularly Black communities

Please also see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and

Displacement analysis. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

4. Wealthier communities should have more density and subsidized housing

Please see frequent comment response concerning *Single family zones not in the study area*.

5. Concern for transit and walkability, keep cars away from downtown/central areas

Please see Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

Cherberk, Mark

1. EIS is not adequate.

Thank you for your comment. Comment noted.

Chesko, James

1. Prefers Alternatives 2 or 3

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative.

2. Concern about high displacement areas

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes; Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis* and *Displacement Risk Access to Opportunity Typology*.

3. Concern about bulk and scale allowed in single family zones considering limits on density allowed

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as mitigation measures. Note that zone changes from single family to lowrise and more dense zones will involve more projects in those areas becoming subject to design review.

4. Concern for enforcement of Seattle Design Guidelines

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as mitigation measures. Please see Fall 2017 action in progress to update the Seattle Design Review Program, and various efforts to develop Design Guidelines in Seattle neighborhoods.

5. Concern for transportation infrastructure

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as the Growth with Livability report.

6. Concern for tree canopy and sewer infrastructure

Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment responses concerning *Impacts on tree canopy* and *Impacts to sanitary sewer systems*.

7. Interest in more parks

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures as well as the Growth with Livability report.

8. Concern for stormwater infrastructure

Please see EIS Chapter 3.8 Public Services and Utilities for discussion of impacts and mitigation measures as well as frequent comment response concerning *Impacts to Stormwater Infrastructure*.

9. Concern for air quality, interest in energy efficient construction and alternative modes of transportation

Thank you for your comment. Comment noted. Some topics here are outside the scope of the MHA EIS and so no response is provided.

Please see EIS chapters 3.4 Transportation and 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures.

Christian, Brent

1. Representation of the C Line is not accurate under existing conditions because C Line buses are not at 67% capacity and sometimes skip stops because they are full.

The 0.67 ratio cited by the commenter relates to King County Metro's Crowding Threshold which allows for more passengers than the number of seats on the bus. A crowding threshold ratio of 1.0 is equivalent to a load factor (ratio of passengers to seats) of 1.25 or 1.50, depending on the route frequency—this represents a situation where all buses over the AM peak period are completely full at some point along their journey. The DEIS acknowledges that some trips within the peak period operate at full capacity. As stated on page 3.204, "some routes, such as the C Line and E Line with ratio greater than 0.64, will have portions of the route with standing room only. The demand used for the analysis is the average of the maximum loads during the AM peak. Some trips may have no capacity, but over the entire peak period, there is capacity on the corridors." Errata for the FEIS will clarify that some trips will be unable to accommodate all passengers resulting in skipped stops. However, the overall transit impact findings remain unchanged.

The ridership data used is the average maximum load of passengers on each bus trip in Fall 2016, averaged over the AM peak period.

Transit riders at skipped stops are reflected in the loaded passengers in the following bus trip. Our analysis of the existing data shows that on average during the AM peak period, a C Line bus trip will have standing room only at the busiest segment, which is consistent with the commenter's statement.

2. The analysis of the West Seattle Bridge is lacking because it should include more data points for the existing traffic.

The DEIS team used the best data available at the time of analysis. While additional data can be valuable, the purpose of the DEIS is to compare transportation system performance between the future year alternatives, specifically how Action Alternatives 2 and 3 would compare to No Action Alternative 1.

Our analysis found up to 30 additional cars in the westbound direction and up to 10 additional cars in the eastbound direction are expected in the PM peak hour under Alternatives 2 and 3 compared to the No Action Alternative 1 in 2035. As the resulting v/c ratio is less than the 1.20 threshold, no impacts were identified on the West Seattle Bridge.

Our analysis found that under both action alternatives, the travel time across the West Seattle Bridge would increase by about half a minute (15.5 minutes) compared to No Action (15.0 minutes). This results in a LOS F rating under No Action to a slightly worse LOS F rating under Alternatives 2 and 3. As the City does not have corridor travel time performance metric standards, this analysis was for informational use only and not a metric to identify a transportation impact.

3. The DEIS did not even consider the historic Hamm and Campbell buildings in the Alaska Junction in West Seattle. Nor did it consider the 2016 survey of historic properties along California Ave SW and the 3 streets immediate east and west of it.

Exhibit 3.5.3 of the Draft EIS includes the West Seattle Junction Historical Survey Group's survey of the West Seattle Junction. As a Programmatic EIS, project-level issues regarding specific resources are not evaluated.

4. Concern about impacts on school capacity

Please see frequent comment response concerning *Impacts to Seattle Public School capacity*

5. Concern about wastewater facilities in West Seattle Junction; DEIS fails to study peak flows

Please see frequent comment response concerning *Impacts to sanitary sewer systems* and *Impacts to Stormwater Infrastructure*.

Christian, Katharine

1. **The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.**

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

Christie, David

1. **Concern that there would be too much density in the immediate neighborhood bounded by 42nd Ave. SW and Parshall Place SW, and SW Holly St. to SW Frontenac St.**

Thank you for your comment. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix H Zoning Maps.

2. **The action alternatives would create the need buffers at transition between zoning designations.**

Thank you for your comment. Under the Preferred Alternative, since the existing LR3 zone would remain an LR3 zone, and the half block to the east would be an RSL zone, buffer conditions would be similar to those under existing zoning.

3. **There hasn't been enough input from neighborhoods.**

Comment noted. Please see frequent comment response concerning community engagement. Please also see summary of public input at Appendix B.

4. **Traffic is bad and would get worse.**

Comment noted. Please see discussion of transportation impacts in Section 3.4.

5. **Adequate parking is already a problem. Parking should be required with new residential development.**

Comment noted. Please see frequent comment response concerning parking impacts and mitigation.

6. **We already have too few green spaces in Morgan Junction.**

Comment noted. Please see discussion of open space impacts and mitigation in Section 3.7.

7. **Morgan Junction would have more to offer existing residents under the No Action alternative than with MHA implementation.**

Comment noted. Changes to zoning are proposed in order to reach objectives including implementing an affordable housing requirement

for new development and increasing overall production to meet high citywide demand for housing.

8. Prefers Alternative 1 No Action for the small pocket of Morgan Junction that is the focus of the comment letter.

Comment noted. Thank you for your comments.

Chu, Brian (Yesler Community Collaborative)

1. Encourage the City to apply an equity lens in the implementation of MHA citywide.

Thank you for your comment. See frequent comment response Impacts on racial and cultural minority groups. This response includes information on how the FEIS incorporates additional analysis in Chapter 3.1 Housing and Socioeconomics to address your comment. Please also see response to Pasciuto, Giulia.

2. The city should develop additional mitigation measures to address cultural displacement.

Thank you for your comment. Please see Section 3.1.3 where the FEIS includes supplemental description of mitigation measures related to cultural displacement impacts.

Clark, Bill

1. The existing east boundary of the Roosevelt Urban Village should not be expanded across 15th Ave. NE.

Thank you for your comment. Comment noted. Potential impacts associated with urban village boundary expansions studied in the action alternatives are discussed in Section 3.0.

2. Consider a different pattern of zoning for MHA implementation in the area east of 15th Ave. NE.

Thank you for your comment. Comment noted. Please see the Preferred Alternative for the Roosevelt Urban Village in Appendix H.

3. The EIS should explain the significance of the urban village designation with respect to land use regulation, beyond policy considerations.

The primary differences in land use regulation associated with the urban village designation are that parking requirements for residential uses generally do not apply to development within urban villages. Certain zone designations, including the Lowrise 3 (LR3) multi-family zone have differences in height and FAR limits depending on whether land is within the urban village or not. Development standards are summarized in Appendix F.

Clark, Josie

1. **Implement MHA with an LR1 designation in the area of Columbia City on 33rd, 34th, and 35th Ave S between Oregon and Alaska.**

Thank you for your comment, and for the time and effort to convene neighbors to discuss the MHA proposal and provide input to the City. Comments are noted. Please see the Preferred Alternative map for the Columbia City Urban Village in Appendix H, which would include the LR1 zone for the area that is the subject of your comment.

Clark, Karen

1. **Commenter prefers Alternative 1 or Alternative 2; Alternative 3 is unsustainable**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

2. **Concern about livability of new housing and affordable housing requirements**

Please see frequent comment response concerning *MHA affordable housing requirements* and *Location of MHA housing units*. Note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

3. **Crown Hill urban village is receiving more M2 zone changes than hub urban villages; growth projections are not accurate; concern about quality of new affordable housing**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

For growth data, please see EIS Appendix G Technical Memorandum: MHA EIS Growth Estimates.

For information on affordable housing funded with MHA payment, please see response to comment 2 above.

4. and 5. **Concern about light and shading effects of proposed building heights, in particular locations**

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as mitigation measures and frequent comment response concerning *Individual urban village review*.

6. Concern about strain on transit capacity; concern about parking and requirements with new development

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Parking impacts and mitigation*.

7. Concern about loss of trees and green space, and impacts on climate and stormwater runoff

Please see EIS chapters 3.6 Biological Resources and 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures, as well as frequent comment responses concerning *Impacts on tree canopy* and *Impacts to Stormwater Infrastructure*.

8. Concern about removal of pedestrian overpass to Crown Hill Park

Please see frequent comment response concerning *Individual urban village review*.

9. Concern about lack of parking requirements and traffic congestion

Please see response to comment 6 above.

Clark, Kevin

1. Supportive of Alternative 2 on specific parcel.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see Appendix H for detailed maps.

The preferred alternative does not include the zone change requested. Updated MHA implementation guidelines limit zone changes within a distance of major highways such as Interstate 5.

Clifton, Linda (Fremont Neighborhood Council)

1. Fremont Neighborhood Council (FNC) supports livability, diversity, inclusion and housing for all.

Thank you for your comments on the EIS.

2. Concerns about inclusive engagement.

Comments noted. Please see frequent comment response concerning community engagement, and please see Appendix B Summary of Community Input.

3. Concerns that MHA implementation would not produce enough affordable housing.

Comments noted. Please note that there is not currently an affordable housing requirement in place for new development within the Fremont area. MHA implementation would add a requirement for

affordable housing. Please see discussion of housing affordability and MHA unit production estimates in Section 3.1. Please also see discussion of housing supply in the impacts subsection.

4. Citywide action ignores location-specific neighborhood issues.

Comments noted. Please see frequent comment response concerning individual urban village analysis.

5. Proposed MHA implementation in the East Fremont area, west of Stone Way is inappropriate.

Comments noted. Please see Preferred Alternative map at Appendix H. Please see the approach for the Preferred Alternative in Chapter 2.

6. Areas outside of the Fremont Urban Village would be affected, and outreach to these areas was lacking.

Comments noted. Please see 2 above.

7. Projections for MHA performance and payment units.

Projections are included in Section 3.1

8. Add density and affordability on Aurora Avenue and change zoning from C to NC.

Comments noted. Please see Preferred Alternative including approach for the Preferred Alternative as described in Chapter 2. Please see also MHA Implementation Principles at Appendix C. Please see Section 3.9 Air Quality and Greenhouse Gas Emissions.

9. Regarding changes of zoning from C to NC along Northwest 36th and Leary Way.

Comments noted.

10. Study and resolve potential impacts including, edge conditions, construction, infrastructure, light/air, and trees.

Comments noted. Please see sections 3.2–3.9.

Cochran, Phil

1. Family sized housing.

Thank you for your comment. Comment noted. See frequent comment response regarding Family-Sized Housing.

2. Each neighborhood needs a separate EIS.

See frequent comment response regarding Individual Urban Village Review.

3. Parking requirements.

See frequent comment response regarding On-Street Parking Impacts.

Cocking, Penni-1

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Cocking, Penni-2

1. Concerning historic preservation.

A weblink to the Washington State Department of Health website is provided, concerning historical and cultural review. Please see EIS Section 3.5 for discussion of Historic Resources.

Cocking, Penni-3

Image examples noted.

Cocking, Penni-4

1. Concerning historic preservation.

Please see frequent comment response regarding Historic Preservation. Please See Section 3.5 Historic Resources.

2. Concerning the need for affordable housing.

Please see Section 3.1 affected environment regarding housing and affordability.

3. Review of individual urban villages.

Please see frequent comment response regarding Individual Urban Village Review.

Cocking, Penni-5

Comments noted.

Cocking, Penni-6

Comment noted.

Cocking, Penni-7

Comment noted.

Cocking, Penni-8

1. **Maintain single family zoning in South Park because it keeps toxicity levels in the Duwamish region at lower levels than if they had not been kept as yards and gardens.**

Comment noted. Please see discussion Section 3.9 Air Quality and Section 3.6 Biological Resources. Please also see the Preferred Alternative Map for South Park in Appendix H, which would apply MHA with the Residential Small Lot designation, for all lands currently zoned single family in South Park. No changes to multi-family or commercial zoning are proposed for these areas under the Preferred Alternative.

Cocking, Penni-9

1. **Concerning community engagement.**

Please see frequent comment response regarding Community Engagement.

2. **Concerning toxins.**

Please see Section 3.9 Air Quality and Greenhouse Gas Emissions.

3. **Concerning traffic.**

Please see Section 3.4 Transportation.

4. **Concerning the South Park Urban Village designation.**

Please see the Preferred Alternative for the South Park urban village, and description of the Preferred Alternative in Chapter 2. Under the Preferred Alternative, MHA is applied in South Park with the same approach as for areas outside of urban villages on commercial and multifamily zoned properties.

Cocking, Penni-12

1. **The comment document requests completion of an EIS pertaining to just the South Park neighborhood. The comment document notes that South Park has serious environmental issues, and expresses concern about notice and public engagement.**

Comments noted. Thank you for your comment. Please see frequent comment responses concerning individual urban village review and community engagement. Please see also Appendix B. Please see the Preferred Alternative map at Appendix H for South Park. In recognition of constraints in South Park, the minimum zoning changes necessary to implement MHA are proposed for the South Park area. This approach is consistent with the approach proposed for areas outside of urban villages under the action alternatives.

Commons, Rene

1. City did not honor neighborhood plan.

See subsection 2.2 Planning Context, and Relevant Policies and Codes in Section 3.2 for discussion. Please also note that modification of certain policies in the Neighborhood Plans section of the Comprehensive Plan, concerning single family zoning in urban villages is considered as a part of the proposal for which impacts are analyzed.

2. No meaningful mitigation for loss of light and air on ground floor of existing buildings is proposed.

Section 3.3.3 Aesthetics describes several mitigation measures identified to at least partially mitigate potential aesthetic impacts.

Compton, Angela

1. Commenter supports Alternative 3

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

2. Concern for communities in low opportunity / high displacement risk areas

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS appendices A and B for discussion of the Displacement and Opportunity typology and summary of MHA community input.

3. In favor of changing single family zones and family-size housing

Please see EIS Chapter 3.1 Housing and Socioeconomics and Appendix C for a discussion of urban design and family size requirements, as well as frequent comment responses concerning *Family-sized housing* and *Single family zones outside the study area*.

Condon, Ann

1. Supports comments and conclusions of the Madison Miller Park Community Group.

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Coon, Lisa

1. Comments reference West Seattle Junction frequent comments & responses

Please see comment responses to Tobin-Presser, Christy.

2. Concern about language in DEIS and reality of analysis

Comment noted.

3. Developers are not stakeholders

Comment noted.

4. EIS ignores number of single family homes that will be destroyed

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle’s single family zoned land.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, which include family-size housing types such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas, allows for more family-size and family-style housing, and likelihood of expanded ownership options, in areas that are currently zoned single family.

Finally, note that zone changes allow property owners more options for how to use their property, but do not require that any action, such as redevelopment, take place.

5. Statements about rush hour times

Please see Chapter 3.4 Transportation for discussion of analysis methodology, impacts, and mitigation measures, as well as Relevant Plans and Policies.

6. Statement about tree canopy in single family yards

Please see frequent comment response concerning *Impacts on tree canopy*.

7. Neighborhoods are analyzed together

Please see frequent comment response concerning *Individual urban village review*.

8. Concern about loss of views

Please see EIS Chapter 3.3 Aesthetics for discussion of public and private views.

9. Concern about density and bicycles

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix C MHA Implementation Principles, which include “Ensure MHA program creates affordable housing opportunities throughout the city” and “Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.” Locating more housing near transit and amenity-rich areas helps meet goals for reducing car trips and increasing transit use, which support climate mitigation, equity, and livability goals.

Please see Chapter 3.4 Transportation for discussion of analysis methodology, impacts, and mitigation measures, as well as Relevant Plans and Policies, including the Bicycle Master Plan.

10. Concern about West Point treatment plant and pollution

Please see frequent comment response concerning *Impacts to sanitary sewer systems*.

11. Concern about conflict between neighborhoods, racism, and classism

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

12. Concern about displacement, property values

Please see response to comment #11 above.

13. Concern about single family areas and homeownership

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle’s single family zoned land.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, which include family-size housing types such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas, allows for more family-size and family-style housing, and likelihood of expanded ownership options, in areas that are currently zoned single family.

Note also that the proposal includes family-size unit requirements for both market rate and affordable housing performance. Also note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

Cooper, Scott

1. **EIS does not consider alternatives that vary affordable housing requirements; should include references to how requirements were developed**

Please see frequent comment response concerning *MHA affordable housing requirements*.

2. **Study area should include single family areas outside of urban villages and proposed expansion areas**

Please see frequent comment response concerning *Single Family zones outside the study area*.

Cope, Marilyn

1. **Extend the DEIS comment period.**

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Corcoran, Sue

1. **Supports comments and conclusions of the Madison Miller Park Community Group.**

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Coulter, Brad

1. **Housing changes should be tied to public transportation.**

Comment noted. See description of the Preferred Alternative in Chapter 2. The Preferred Alternative places emphasis on transit service in how MHA would be implemented.

2. Additional zoning capacity and MHA should not be implemented in Magnolia because it is not an urban village.

Comment noted. Under the action alternatives, only existing commercial or multi-family zoned areas outside of urban villages are proposed for MHA implementation, and in those areas the minimum zoning changes necessary to implement the affordable housing requirement would be put in place.

3. Concerns about sanitary sewer capacity.

See frequent comment response concerning Sanitary Sewer Infrastructure.

4. Concerns about public school capacity.

See frequent comment response concerning Seattle Public School capacity and Coordination of Planning with Seattle Public Schools. The FEIS includes additional analysis on public school capacity in Section 3.8 Public Services and Utilities.

Coulter, Sara-1

1. Increased traffic etc. in the area on Gilman Ave. and Government Way in Magnolia will threaten the heron preserve.

See discussion of environmentally critical areas in Section 3.6 Biological Resources.

2. Concern about capacity of public schools.

See frequent comment response concerning Public Schools Capacity. Additional analysis of Seattle Public Schools capacity is added in the FEIS.

3. Concern about traffic.

See discussion of potential transportation impact in Section 3.4.

Currier, Shane

1. The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

Cuthbertson, MacEwan

1. Concern about various impacts of growth.

Thank you for your comments. Comment noted.

Cvitkovic, Mike

1. Each urban village should be evaluated separately.

See frequent comment response concerning Individual Urban Village Review.

2. Variety of housing unit sizes.

See frequent comment response concerning Family-Friendly Housing.

3. Allow denser, multifamily housing in all single family neighborhoods.

See frequent comment response concerning Single Family Zones Outside of the Study Area.

Dahn, Denise

1. Opposes policy or use change to natural parks lands.

See frequent comment response on this topic.

Dal Porto, Danna

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

2. Various concerns about impacts of growth.

Thank you for your comments. Comments noted.

Davis, Jean

1. Concern about small business displacement, mitigation measures should be specified

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

Please see EIS Chapter 3.1 Housing and Socioeconomics as well as the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses payment dollars to fund acquisition and rehabilitation of existing housing.

2. Concern about infrastructure investments in transit, schools, street paving, drainage and sewer, sidewalks, and police response times

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures. Please see frequent comment responses concerning *Impacts to Seattle Public School capacity*, *Impacts to sanitary sewer systems*, and *Impacts to Stormwater Infrastructure*.

Also note that new development inside urban villages requires sidewalks in many cases. Please also see Chapter 3.4

Transportation for discussion of impacts and mitigation measures, as well as Relevant Plans and Policies, which includes “New sidewalks, particularly near schools” as part of the City of Seattle 2017–2022 Transportation Capital Improvement Program. Please see DEIS Chapter 3.8 concerning Public Services and Utilities: “demand on fire and emergency services would be identified and managed as the project is implemented” and “impacts on fire and emergency services as a result of demand increases would be identified and managed during the project approval process.”

3. DEIS growth projections are too low and do not account for pipeline projects; growth figures should be readjusted

Please see comment response to Lowe, Anne-Marie.

4. Transit analysis and mitigation measures are inadequate

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

5. Concern about parking; there should be more data provided about frequent bus service investments

Please see frequent comment response concerning *Impacts to parking* as well as response to comment #4 above.

6. Concern about flooding in Crown Hill

Please also see frequent comment response concerning *Impacts to Stormwater Infrastructure*.

7. Concern about school capacity

Please see frequent comment response concerning *Impacts to Seattle Public School capacity*.

Davis, Renee

1. In the Roosevelt Urban Village implement MHA by making greater development capacity on properties already zoned commercial or multifamily and do not alter single family zoning.

Thank you for your comment. Comment noted.

2. Concerning neighborhood planning.

Thank you for your comment. Comment noted.

3. Concerning family-sized housing.

Please see frequent comment response regarding Family-Friendly Housing.

Deeter, Derek

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

de la Cruz, Aida

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

de la Cruz, Aida-2

1. EIS should address urban villages individually.

Please see frequent comment response concerning Individual Urban Village Review.

2. The EIS does not adequately address the city as a whole.

Please see frequent comment response concerning Citywide Impacts to the City as a Whole.

deLancey, Kristin

1. The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

De Mocko, JM

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Denney, Meyer

1. MHA fees should kick in on new structures with 6 or more units, otherwise it is a development disincentive for smaller projects

Please see frequent comment response concerning *MHA affordable housing requirements* and *Family sized housing*. Please also see EIS Chapter 3.1 Housing and Socioeconomics for discussion of affordable housing requirements.

Denny, Sigrun

1. Concern about loss of yards and green space, walkability, livability, and bulk and scale impacts of new development.

Please see EIS chapters 3.3 Aesthetics, including discussion of the Design Review Program, incorporated plan features, and other mitigation measures, Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment responses concerning *Impacts on tree canopy* and *Individual urban village review*. Please also see the Growth with Livability report.

2. Concern about school capacity and recommendation that proposal include impact fees for school construction.

Please see frequent comment response concerning *Impacts to Seattle Public School capacity*.

DeWilde, Lisa K.

1. Concern about air quality and tree canopy in South Park

Please see EIS Chapter 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures, frequent comment responses concerning *Impacts to tree canopy* and *Individual urban village review*, as well as the Growth with Livability report.

2. Concern about neighborhood voice in planning process

Please see EIS Appendix B, with summary section on the South Park neighborhood, for a discussion of the MHA community input process and a summary of input received.

3. Concern about traffic

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as the Growth with Livability report.

4. Concern about school crowding

Please see frequent comment response concerning *Impacts to Seattle Public School capacity*.

5. Concern about impacts to multicultural community in South Park

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement as well as correlations between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

6. Concern about air quality, green space, and tree canopy in South Park

Please see EIS Chapter 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures, frequent comment response concerning *Impacts to tree canopy*, and the Growth with Livability report.

7. Concern about property taxes

Comment noted. Please see additional discussion in the FEIS section 3.1.2 impacts, of impacts of property tax increases on homeowners.

8. Concern about air quality and tree canopy

Please see EIS Chapter 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures, frequent comment response concerning *Impacts to tree canopy*, and the Growth with Livability report. Please also see responses to comments above.

Dey, Michael

1. Commenter provides background on the Fauntleroy Community Association (FCA)

Thank you for providing context. Comments noted.

2. Commenter states that proposed zone changes would allow development incompatible with existing structures. Concern about views, anticipated decrease in property values.

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures. Please also see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

Please also see frequent comment response concerning *Property taxes*.

3. The commenter describes parking conditions in the Fauntleroy neighborhood and states that the MHA proposal would exacerbate those conditions.

This is a programmatic DEIS that addresses area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects that will be required are also unknown. Individual development projects will undergo separate and

more detailed SEPA review during which specific impacts and mitigation (including on-street parking) will be determined. Seattle Municipal Code 25.05.675.M.2.b expressly exempts on-street parking impact mitigation for new residential development within “portions of urban villages within 1,320 feet of a street with frequent transit service.” This exception covers much of the area affected by the MHA proposal. Any areas not covered by that provision would be subject to mitigation during the project review.

Please see frequent comment response concerning *Impacts to parking*.

4. Commenter summarizes previous comments.

Please see responses to comments above.

DiLeva, Mary Pat

1. The Access to Opportunity Index is flawed because it includes data from schools that residents are not automatically allowed to attend by living in that school’s attendance area.

The elementary and middle school performance data used includes only those neighborhood schools with attendance areas. It does not include data from the geozones associated with option schools. Please see the Growth and Equity Analysis in Appendix A for description of the methodology used to create the Access to Opportunity Index.

2. The Access to Opportunity Index is flawed because it includes the light rail network as part of the calculation of access to a university or college.

Comment noted. One of the 13 indicators compiled into the Access to Opportunity Index is the area within 30 minutes of a college or university by transit, including bus and/or light rail. Please see page 57 of the Growth and Equity Analysis in Appendix A.

3. The weighting of indicators in the Access to Opportunity Index is flawed.

Comment noted. Please see the frequent comment response related to the *Displacement Risk–Access to Opportunity typology*.

4. The EIS should review alternatives to MHA that could achieve the stated objectives.

Please see the frequent comment response related to *alternatives to MHA that could reach objectives*.

5. Assumptions about whether low-income households can live in areas with high access to opportunity are flawed because MHA affordable housing units may not be located near where development occurs.

Please see the frequent comment response related to *location of MHA housing units*.

6. **Aesthetics visualizations minimize height and bulk impacts. Renderings depicting aesthetic impacts should place views of new development side-by-side with existing structures. They show pitched roofs when flat roofs are more common in new construction. Some low-income areas have few existing houses with heights of 30 feet.**

See comment responses to Bricklin, David comment 6 and comment response to Cave, Donn-1. The aesthetics visualizations show existing houses with a range of heights. See additional renderings in Appendix F, Urban Design and Neighborhood Character Study.

7. **The EIS should include view and shading impacts.**

See responses to comments Cave, Donn-9 and Bricklin, David comment 6.

8. **Aesthetics visualizations should not feature hypothetical modern single-family structures.**

Comment noted. The visualizations illustrate the height, bulk, and scale of potential redevelopment allowed under current regulations that apply in single-family zones. As described in the frequent comment response related to *individual urban village review*, the EIS is a programmatic document designed to assess impacts at a citywide scale. Therefore, the aesthetics analysis evaluates impacts of generalized and common building types on the evaluate overall character of the street.

9. **The EIS should indicate the Design Review thresholds.**

DEIS Exhibit 3.3-6 identified the existing design review thresholds at the time of writing. The FEIS includes updated information on proposed changes to design review thresholds in Section 3.3, that could occur through separate action. As potential mitigation, the EIS recommends further modifications to the Design Review process to expand the types of development subject to the process. This includes specific consideration in the design review thresholds for areas that would receive an increase in zoning from a single-family zone with MHA implementation.

10. **The EIS should consider heat and glare from new buildings.**

See the response to Bates, Tawny-2 comment 13.

11. **The EIS should consider noise from new buildings.**

See the response to Bates, Tawny-2 comment 14.

12. **The EIS should consider impacts from large buildings without landscaping.**

Comment noted. Several specific code changes related to trees and landscaping are added in the FEIS as an integrated part of the proposal. These include modification to Green Factor requirements to give greater weight to tree preservation, incentives in design review for tree preservation, and a new tree planting requirement in the Residential Small Lot (RSL) zone.

13. The EIS should distinguish evergreen and deciduous trees when considering tree canopy impacts.

Thank you for the comment. Additional language has been added in subsection 3.6.3 for potential mitigation measures for tree canopy.

14. The EIS should analyze libraries as a public service.

Comment noted. Consistent with SEPA policies for an EIS, the DEIS includes a focus on the elements most likely to be impacted by the proposal, as determined through the scoping phase.

15. Average response times are not an adequate measure of police service.

Thank you for the comment. Average response time is the standard metric used by the Seattle Police Department and for level-of-service standards.

16. The DEIS does not consider Seattle Public Schools' ability to meet capacity needs.

See frequent comment response concerning *Seattle Public Schools analysis*. The FEIS includes additional analysis in Section 3.8 related to public school capacity.

17. The EIS should consider the effects of construction activity on sidewalks.

Comment noted. See response to comment 14 above. Note that the Seattle Department of Transportation (SDOT) requires some development projects to develop and submit a Construction Management Plan that includes plans and mitigation for right-of-way use, which includes sidewalks. Also note that new development in urban villages requires sidewalks in many cases, as outlined in SMC 23.53.006.

18. The EIS should identify areas served by sewers less than 12 inches in diameter.

As noted in Section 3.8 Public Services and Utilities, such areas are likely at or near their capacity and downstream pipes from new development would have to be upgraded

to a minimum 12-inch diameter. This requirement would occur when a development applies for a permit to work on or connect a building to the public sewer system.

19. Each urban village should have its own EIS.

Please see frequent comment response concerning *Individual urban village review*.

20. The DEIS does not address how the whole City will be impacted by the changes both in this DEIS and the other SEPA analyses combined.

Please see the frequent comment response related to *citywide impacts*

Dimbirs, Andrejs

1. **The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.**

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

Dimbirs, Shirley

1. **The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.**

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

DiRaimo, Ryan (Aurora-Licton Springs Urban Village (ALUV))

1. **ALUV's Mission.**

Thank you for your comment, and for the work of ALUV to improve the Urban Village.

2. **Support for converting existing Commercial (C1, C2) zoning to Neighborhood Commercial (NC).**

Thank you for your comments. Comments noted. Please see the Preferred Alternative Urban Village map for Aurora-Licton Springs in Appendix H, which includes conversion to NC zoning for the area.

3. **Alternative 2 is preferred for areas outside of the Aurora Avenue commercial corridor.**

Thank you for your comments. Comments noted. Please see the Preferred Alternative Urban Village map for Aurora-Licton Springs in Appendix H.

4. **Waive MHA affordable housing requirements or in-lieu payment in the Aurora Avenue corridor to incentivize development there.**

Thank you for your comment. Comment noted. A key component of proposed MHA evaluated in the EIS is to apply affordable housing requirements to all commercial and multifamily zoned areas and urban villages throughout the city.

5. Neighborhood design guidelines are a high priority for ALUV, and their preparation for Aurora-Licton Springs should be required mitigation for the proposed action.

Thank you for your comment. Comment noted. As stated in the comment, preparation of design guidelines for neighborhoods such as Aurora-Licton Springs, which does not yet have them, is one of the mitigations recommended to decision-makers that could mitigate aesthetic impacts to a non-significant level.

Ditty, Sarah

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Dlugosch, Deborah

1. Agrees with Crown Hill Urban Village Committee for Smart Growth letter

Please see comment responses to Krueger, Ingrid.

2. Concern about public transit infrastructure

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as the Growth with Livability report. Please also see frequent comment response concerning *Individual urban village review*.

3. Concern about commercial zoning on side streets

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as the Growth with Livability report. Please also see frequent comment response concerning *Individual urban village review*. Please also see comment responses provided above.

4. Concern about infrastructure

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program and Chapter 3.4 Transportation for discussion of impacts and mitigation measures. Please see frequent comment responses concerning *Individual urban village review*, *Impacts to street parking*, and *Impacts to Seattle Public School capacity*. Please also see comment responses provided above.

5. Displacement risk and access to opportunity typology is flawed

Please see frequent comment response concerning *Displacement Risk Access to Opportunity Typology*. Please also see comment responses provided above.

6. Concern about proposed zone changes on specific streets; impacts to light, access, parking, and traffic

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program and Chapter 3.4 Transportation for discussion of impacts and mitigation measures. Please see frequent comment responses concerning *Individual urban village review* and *Impacts to street parking*. Please also see comment responses provided above.

7. Concern about ground floor commercial requirements

Please see EIS Appendix B for summary of community input about commercial affordability.

8. Concern about impacts to light and evergreen tree canopy

Please see comment responses provided above as well as frequent comment response concerning *Impacts to tree canopy*.

9. Concern about impacts to transit capacity, parking, and lack of sidewalks

Please see comment responses provided above.

10. Impacts to tree canopy are too low

Please see comment responses provided above.

11. Concern about impacts to parks and open space resources

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures.

12. Concern about impacts to stormwater infrastructure

Please see frequent comment responses concerning *Impacts to stormwater infrastructure*.

13. Concern about impacts to air quality and tree canopy

Please see frequent comment responses concerning *Impacts to tree canopy* and EIS Chapter 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures.

Dooley, Stephen

1. Concern about Beacon Crossings on 2505 Beacon Ave, affordability levels and parking requirements.

Thank you for your comment. Your comment is noted, however it is not specific to the environmental assessment of the proposed Action Alternatives.

Doughterty, Jason

1. Concern about loss of tree canopy.

Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

Driver, Nancy-1

1. DEIS does not honor neighborhood plans.

Thank you for your comment. See subsection 2.2 Planning Context, and Relevant Policies and Codes in Section 3.2 for discussion. Please also note that modification of certain policies in the Neighborhood Plans section of the Comprehensive Plan, concerning single family zoning in urban villages is considered as a part of the proposal for which impacts are analyzed.

2. Concern about infrastructure, particularly sanitary sewer systems.

Please see frequent comment response concerning Impacts to Sanitary Sewer Systems.

3,4. Mitigation for negative impacts to character of the Junction urban village are not identified. The DEIS does not proposed meaningful mitigation for loss of light and air on the ground floor of buildings.

See section 3.3 Aesthetics. Mitigation measure for potentially increased bulk in new buildings constructed under the action alternatives are identified. See frequent comment response concerning individual urban village review. Review for potential mitigation of project-specific impacts including shadowing impacts would occur at the time of development review for projects subject to Design Review and SEPA.

5. DEIS does not address school capacity.

See frequent comment response concerning coordinated planning with Seattle Public Schools. Additional analysis is added in the FEIS in section 3.8 Public Services and Utilities.

6. DEIS does not adequately address traffic and parking in this area.

See frequent comment response concerning parking impacts and mitigations. See also response to Tobin-Presser, Christy-3.

7. DEIS does not adequately address traffic and parking in this area.

Comment noted. Please see section 3.7 Open Space and Recreation, which includes mitigation measures for the identified impact to parks availability.

8. DEIS does not take into account community input from the neighborhood.

Please see frequent comment response concerning community engagement. Please see also response to Burco, Greta, comment 5.

Driver, Nancy-2

1. **The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.**

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

Dubrule, Jeff

1. **Commenter supports urban village expansions and increasing height limits, and concern about racial exclusion from single family areas**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

2. **Concern that Action Alternatives do not go far enough, with concern about diversity and cultural significance of the city**

Please see comment response above.

3. **Concern about adding parking capacity – should focus on transit**

Please see frequent comment response concerning *Impacts to parking* and EIS Chapter 3.4 Transportation, for discussion of impacts and mitigation measures.

Duff, Alice

1. **Agrees with Historic Seattle concerning impacts to historic resources.**

Please see response to Woo, Eugenia.

2. **Required affordable housing should be required to be built on site of new development.**

Please see frequent comment response concerning location of MHA affordable housing.

3. **The DEIS does not connect MHA to URM.**

Please see response to Woo, Eugenia. The FEIS includes additional analysis and discussion of URM buildings in Section 3.5 Historic Resources.

Dunn, Kimberly

1. Request to move proposed Crown Hill urban village expansion boundary

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives and Appendix H Zoning Maps.

The requested change to the proposed urban village expansion area boundary has been included in the preferred alternative.

1. Request to move proposed Crown Hill urban village expansion boundary

Please see comment response above.

Dunn, Pamela

1. Supports comments and conclusions of the Crown Hill Urban Village Committee for Smart Growth.

Comments noted. Please see response to Krueger, Ingrid-1.

Dunn Marsh, Michelle

1. Prefers Alternative 3, concern about staff being able to afford living and working in Seattle

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

2. Concern for housing and socioeconomics

Please see response to comment above.

3. Request for zone change on a specific parcel

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives and Appendix H Zoning Maps.

The requested zone change to specific parcels has been included in the preferred alternative.

4. Request for zone change on a specific parcel

Please see response to comment above.

5. Interest in adding bus service along 12th Ave

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures. Please also see frequent comment response concerning *Individual urban village review*.

6. Interest in continuing to provide art and cultural space for the public

Thank you for your comment. Your comment is noted.

Dunn Marsh, Michelle-2

1. We would like our entire site to be zoned NC2P-75 so we can dedicate 10% of residential component to affordable housing if we redevelop in the future.

Please see the Preferred Alternative map for the First Hill-Capitol Urban Center in Appendix H. Under the Preferred Alternative the site would have NCP-75 (M1) zoning.

Earl, Karen

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Early, Tom (Seattle Urban Forestry Commission)

1. What is the projected tree loss in the No Action Alternative?

The EIS does not estimate the amount of tree canopy cover loss under the No Action Alternative. Changes in canopy coverage are expected, but would be a result of current zoning and tree protection policies, codes and development standards. Since the most recent 2016 LiDAR data can't be directly compared to earlier tree canopy assessments due to data limitations, it is not possible to calculate a trend for tree canopy loss or gain under existing conditions. The Urban Forest Stewardship Plan (UFSP) is referenced in order to characterize goals and challenges related to preserving and increasing tree canopy coverage under existing conditions without MHA implementation.

2. Please explain in more detail the methodology used to estimate the projected tree canopy loss under the alternatives.

Please see Assessment Methodology in Section 3.6.

3. How would mitigation measures be actionable or enforceable when the UFSP is a policy document.

In order to enforce actions for mitigation, recommendations and policy suggestions in the UFSP would have to be codified, or administrative practices would need to be adjusted. Please see additional discussion in the FEIS on tree canopy protection measures, including discussion of the recent Executive Order on tree canopy protection. It is anticipated that recommendations of the UFSP would be implemented during the 20 year time horizon to activate mitigation.

4. Why is a 0.5% loss of tree canopy not a significant impact.

The assessment of no significant impact is made by the consultant who prepared the analysis. It is based on the small estimated increment of change due to the proposed action. It is anticipated that implementation of mitigation measures including options the city is currently exploring would mitigate potential impacts to tree canopy and potentially have the intended effect of increasing tree canopy citywide.

5. Tree cover should not be assumed to remain constant over time if the zoning designation stayed the same.

Changes in tree canopy coverage over time include tree losses due to development as well as tree maturation and planting. Measures described in subsection 3.6.3 mitigation measures are already being considered by the city and with the intent of increasing tree canopy coverage to meet the 30% citywide goal. Since 2016 LiDAR data are not directly comparable with past tree canopy coverage surveys it is not possible to ascertain an overall trend in tree canopy gain or loss under existing conditions. It is possible that city policies will have the intended effect of increasing tree canopy over time. The assumption that developers will develop sites to full potential is reflected in the assumption in the action alternatives that rezoned areas will transition fully to a tree canopy coverage condition of the new zone over the study time horizon.

6. Expand and strengthen identified mitigation measures for tree canopy loss.

Please see additional discussion and additional mitigation measure identified in the FEIS. Several specific code changes are added in the FEIS as an integrated part of the proposal. These include modification to green factor requirements to give greater weight to tree preservation, incentives in design review for tree preservation, and a new tree planting requirement in the Residential Small Lot (RSL) zone.

Eaton, Malaika

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Eckord, Bruce

1. The whole city should be included in the MHA proposal.

Comment noted. See Study Areas in Chapter 2. See frequent comment response concerning single family areas outside of urban villages.

Efthimiadis, Nicholas

1. Commenter is against the No Action Alternative, concern for cost of living increases

Thank you for your comment. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods.

2. Concern for marginalized communities and those at high risk of displacement

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

3. Concern about displacement analysis preventing needed development

Please see comment responses above.

4. Interest in zone changes specific to Northgate and light rail station areas

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives and Appendix H Zoning Maps.

Ellis-Bevil, Michelle

1. Opposes policy or use changes for natural parks lands.

Thank you for your comment. Please see frequent comment response on the topic. No policy or use changes for natural parks lands are proposed as part of the proposed action to implement MHA.

England, Kim

1. Action Alternatives downplay displacement effects of MHA

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

2. Data does not include subsidized housing built during time period analyzed

Please see comment response above. Also note that expanded discussion in Chapter 3.1 includes subsidized housing.

3. Concern about data usage

The analysis of relationships between housing development and demographic change in EIS Chapter 3.1 now reflects the most current datasets available from the American Community Survey. The time delay between the most current data and the present is an inherent limitation in this type of analysis. The EIS acknowledges that the findings could be different if data were available that captured the most recent years of housing development and demographic change.

4. Analysis does not adequately define “low income households”

The EIS analysis includes an analysis of changes in the number of households earning 0-50 percent of AMI, 0-80 percent of AMI, and 50-80 percent of AMI. Due to interest in the effects of housing development on middle-income households, it also examines changes in the number of households earning 80-120 percent of AMI.

5. Analysis does not include cost burden

EIS Chapter 3.1 recognizes that low-income households living in market-rate housing may be paying a substantial amount of their income towards housing costs. Please see Chapter 3.1 for data on the share of low-income households who are cost burdened (paying more than 30 percent of their income towards housing costs) and severely cost burdened (paying more than half their income towards housing costs).

6. DEIS downplays impacts of demolitions and renovations on displacement, TRAO data is not a sufficient indicator

Please see Chapter 3.1, DEIS p. 3.30 for discussion of some caveats related to the use of TRAO data.

Fanucchi, Chuck

1. Consideration needs to be given to protection of open green spaces and improvement of public transportation in West Seattle.

Thank you for your comment. Comment noted. See Chapter 3.7 of the EIS, Open Space and Recreation, for more information.

2. The requirement for the number of units set aside for affordable housing in new development should be increased.

Thank you for your comment. Comment noted. See Chapter 3.1 of the EIS, Housing and Socioeconomics, for more information. See frequent comment response concerning MHA affordable housing requirements for more information.

Fay, Frank-1

1. **The DEIS did not study whether in-lieu fees collected would produce the same number of units as on-site requirements.**

The proposed action evaluated is implementation of MHA requirements currently codified in SMC Chapter 23.58B and 23.58C to the study area, which include both payment and performance options for affordable housing. In program formulation, the City considered whether on site performance would produce the same amount of housing as in-lieu payments. Because in-lieu payment can leverage other sources of funding, most notably low-income housing tax credits, the amount of affordable housing generated is much greater through the payment option. All on-site development would not meet the proposal's objective for total net new rent and income restricted housing. The commenter's calculation of in-lieu fee units per on-site units is incorrect mainly because the leveraged funding sources are not considered. See Appendix G Estimate of MHA Affordable Housing Production for more information. See also frequent comment response, alternatives to MHA that could meet objectives.

2. **The DEIS did not study the effects of delay in building affordable units using in-lieu payments.**

The MHA requirements codified in Chapter 23.58B and 23.58C, and as summarized in Chapter 2 for implementation in the proposed action, account for a time delay between the point of payment collection and funding of new affordable housing development. A cost premium is assigned in the translation of performance unit requirements to in-lieu payment amounts to account for delay. When MHA is in place, funds collected through payment will be awarded on an annual basis to affordable housing developments.

Fay, Frank-2

1. **The DEIS did not study alternatives to in-lieu fees by square footage for off-site affordable housing.**

The proposed action evaluated is implementation of MHA requirements currently codified in SMC Chapter 23.58B and 23.58C to the study area. MHA requirements factor in the type of housing units and construction in the assignment of the (M), (M1), and (M2) amounts, relative to the amount of increased development capacity. Market areas of the city are also factored into the MHA requirements. See Chapter 2 for more information.

Fay, Frank-3

1. **EIS did not study whether requiring affordable housing units on site would produce more affordable housing.**

See response to Fay, Frank-1.

Fay, Frank-4

1. **The EIS did not study effect of requiring affordable housing at affordability levels other than 60% AMI.**

The proposed action is to implement MHA requirements as established in SMC Chapters 23.58B and 23.58C to the study area. One of the proposal's objective is to create net new income and rent restricted units at the 60% AMI affordability level.

Fay, Frank-5

1. **The EIS did not study MHA requirements of 15%, 20% and 25%.**

See EIS Chapter 2 subsection 2.4, Alternatives Considered but Not Included for Detailed Analysis.

Fay, Frank-6

1. **No Alternatives met the objective of 6,200 affordable housing units at 60% AMI over 20 years.**

Alternatives 2, 3 and the Preferred Alternative all meet this objective. See Chapter 2, and Section 3.1 Housing and Socioeconomics for tabulation of MHA affordable housing units.

2. **The DEIS did not consider alternative policies that could meet the objective.**

See EIS Chapter 2, including Alternatives Considered but Not Included for Detailed Analysis. See responses to Fay, Frank-1,2,4,5.

Fay, Frank-7

1. **The EIS did not study whether any alternative met the City's objective of providing affordable housing for a broad range of households.**

See Section 3.1 Housing and Socioeconomics. The affected environment subsection discusses existing demographics and income characteristics, and the affordability of housing for households in Seattle. The impacts section discusses the quantity of MHA affordable housing units that would be created, which would primarily serve the 60% AMI level. Since market rate housing does not frequently provide affordable housing options for low-income households, additional rent and income restricted housing for low income households would broaden the range of households served. The impacts section also discusses other effects of the proposed action including effects of the supply of additional market rate housing, which would be likely to moderate housing costs for moderate and higher income households over the study timeframe.

Fay, Frank-8

1. **EIS did not study an alternative of imposing an affordable housing requirement on new development without changing zoning.**

See frequent comment response, Alternative to MHA that could meet the objectives.

Fay, Frank-9

1. **The DEIS does not meet SEPA requirements for the consideration of alternatives.**

See Frequent Comment Response to *Alternatives to the MHA proposal that could achieve the stated objectives*.

2. **The MHA-R framework should be part of the current DEIS or be subject to separate SEPA review.**

See comment response to Raaen, Lee. The MHA EIS is limited to a discussion of alternatives for implementing adopted city policy relating to affordable housing. The comment notes that the MHA Framework was adopted following publication of a SEPA determination of non-significance (DNS). Publication of a DNS based on review of an environmental checklist does constitute review pursuant to SEPA. But that prior action is not the subject of the current proposal, and the MHA FEIS is not an appropriate forum for responding to assertions regarding the appropriateness of prior SEPA procedural decisions.

Please also refer to responses to Fay, Frank-1,2,5,6,7 regarding EIS alternatives. Chapter 2 of the EIS identifies several alternative approaches that were initially considered but were eliminated from detailed analysis.

Fenner, Phil

Opposes policy or use changes for natural parks lands.

Thank you for your comment. Please see frequent comment response on the topic. No policy or use changes for natural parks lands are proposed as part of the proposed action to implement MHA.

Field, Julia

1. **Consider increasing the in-lieu fee to a minimum of \$200 per square foot.**

Thank you for your comment. Comment noted. See Chapter 3.1 of the EIS, Housing and Socioeconomics, for more information. See frequent comment response concerning MHA affordable housing requirements for more information.

Filer, Curran

1. MHA does not address impacts of density to existing neighborhoods, or neighborhoods in enough detail

Please see frequent comment response concerning *Individual urban village review*.

2. Proposal does not encourage affordable housing in areas with a lot of development

Please see frequent comment response concerning *MHA affordable housing requirements* and *Location of MHA housing units*.

3. MHA does not include limits to development

. Please also see EIS Chapter 2.0 Description of the Proposal and Alternatives for a description of MHA and the approach to addressing the affordable housing crisis.

4. MHA will allow too much development, development standards are insufficient

Please see EIS Chapter 3.3 Aesthetics for discussion of impacts and mitigation measures.

5. Concern about public transit and parking

Please see frequent comment response concerning *Impacts to parking*. Please also see EIS Chapter 2.0 Description of the Proposal and Alternatives, Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as the Growth with Livability report.

6. Concern about protection and development of new green spaces

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures.

7. Concern about sewer and stormwater infrastructure

Please see frequent comment response concerning *Impacts to Stormwater Infrastructure*.

Finlayson, Patricia

1. Concern about loss of single family neighborhood, biological resources, open space capacity, transportation capacity

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle's single family zoned land.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, which include family-size housing types such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density

limits than single family areas, allows for more family-size and family-style housing, and likelihood of expanded ownership options, in areas that are currently zoned single family.

Note also that the proposal includes family-size unit requirements for both market rate and affordable housing performance. Also note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

Please see EIS Chapter 3.6 Biological Resources for an updated discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures.

Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as Relevant Plans and Policies.

2. Concern about small business, lack of affordable or moderate cost housing

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

Please also see comment response above.

Fitzgibbons, Dawn

1. Supports affordable housing, concern about definition of “affordable” being out of reach for many

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

2. MHA payment option is too low and not commensurate with cost of performance

Please also see frequent comment response concerning *MHA affordable housing requirements*.

Flood, Greg-1

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Flood, Greg-2

1. Commenter does not agree that the comment period was long enough.

Comment noted.

2. DEIS does not adequately address adverse impacts.

Comment noted. Please see Sections 3.1-3.9.

3. DEIS fails to address alternatives to the proposal.

Comment noted. Please see frequent comment response concerning alternatives that could meet objectives.

4. DEIS fails to address how the proposal would be sympathetic to the surrounding environment.

Comment noted. Please see discussion of impacts and mitigation in Sections 3.2 Land Use, and 3.3 Aesthetics.

5. DEIS fails to address why an increase in density is needed.

Comment noted. Please see frequent comment response concerning alternatives that could meet objectives.

6. Impact to existing homeowners due to property tax increases is not analyzed.

Comment noted. Please see additional discussion in the FEIS section 3.1.2 impacts, of impacts of property tax increases on homeowners.

7. Be specific about adverse impacts. Demonstrate how the proposal will meet objectives.

Comment noted. Please see Section 3.1-3.9 for discussion of impacts, and how the proposal will meet objectives. Please note that the objectives for the proposal are listed in Chapter 2.

Foltz, Mark-1

1. Supports the action alternatives, and more housing and affordable housing in areas with high access to opportunity.

Thank you for your comment. Comment noted. Please see description of the Preferred Alternative in the FEIS.

2. Concern that MHA assumption of 50/50 payment and performance is wrong, and not enough affordable housing will be located in high opportunity areas.

Comment noted. Please see frequent comment response concerning location of MHA affordable housing. MHA gives developers the option of providing affordable units on-site or through payment of a fee; this option is required by state law (RCW 36.70A.540). The anticipated split between on-site production and payment-based units is based on reasonable assumptions, but how developers will respond cannot be known or predicted with certainty. In general, the city plans to monitor the MHA program as it is implemented over-time and will make necessary adjustments in response to disproportional effects on any individual sub-areas. It is acknowledged and accounted for that there will be a gap of time between development approval, construction and the availability of MHA units. Please see response to Fay, Frank-1.

3. Include urban village expansions to the full 10-minute walkshed, and apply relatively larger capacity increases near transit stations, which will help reduce carbon emissions.

Comment noted. Please see the Preferred Alternative.

4. Less intensive upzones in high displacement risk areas is not an effective approach to minimize displacement.

Comment noted. Please see expanded discussion of direct, economic and cultural displacement in Section 3.1 in the FEIS.

5. Do not hinder affordable housing development sites with insufficient development capacity.

Comment noted. Please see the Preferred Alternative.

6. Include tools and mitigations to improve access to opportunity in lower opportunity areas.

Comment noted. Please see the Preferred Alternative. Please see expanded discussion of mitigation measures in Section 3.1 Housing and Socioeconomics.

Foltz, Mark A.-2

1. Prefers Action Alternatives

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

2. Displacement analysis should focus on economic displacement; TRA0 is not an accurate proxy

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

3. Concern for displacement of historically marginalized communities in high risk low opportunity areas

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

4. Concern that urban village expansion areas do not include Wallingford; Wallingford should have higher percentage of M2 zone changes

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see discussion of urban village boundary expansion areas identified in the Seattle 2035 Comprehensive Planning process.

5. Support for Design Review Program

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as mitigation measures.

6. Concern about enough housing capacity around light rail stations

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

7. Concern for older buildings and interest in TDR to preserve and update them

Please see EIS Chapter 3.5 Historic Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Analysis of historic resources*.

8. Biological Resources impacts should consider impacts of reducing urban sprawl

Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures.

9. Concern for open space and green space in urban villages

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

10. Air Quality analysis does not include benefits of TOD

Please see EIS Chapter 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures.

Fowler, Ruby

1. Rainier Beach should have highest capacity zone changes

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

2. Rainier Beach needs funding for the food innovation district to stimulate economic development

Thank you for your comment. Your comment is noted.

3. Agrees with land use analysis

Thank you for your comment. Your comment is noted.

4. Revitalization will benefit neighborhood aesthetics, as will the food innovation district

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as mitigation measures.

5. Rainier Beach transit is a successful model

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

6. Bury more utilities

Please see EIS Chapter 3.8 Public Services and Utilities for discussion of impacts and mitigation measures.

Fox, John (Seattle Displacement Coalition)

1. Background on the Seattle Displacement Coalition, a 39 year old low income housing and homeless non-profit organization.

Thank you for your comments on the EIS.

2. A true second alternative was not studied.

Comment noted. Please see frequent comment response regarding alternatives that could meet the objective.

3. Housing displacement effects. The historic analysis of housing development and change in low income households is out of date and fails to account for the increase in subsidized housing during the same time period.

The DEIS acknowledges limitations with the analysis of potential economic displacement presented on pages 3.33 through 3.42. This analysis was conducted with the best available data at the time of study. As noted in the DEIS, the purpose of this analysis was to explore whether there has been a historic relationship between new housing production and the total change in number of low income households. The purpose was not to provide a full estimate of displaced low-income households up to the present day.

As discussed on page 3.33, the U.S. Department of Housing and Urban Development (HUD) publishes estimated counts of households by income level for census tracts based on American Community Survey 5-year estimates. The most recent time period available at the time of the DEIS analysis was 2009-2013. Subsequent to publication of the DEIS, HUD published new data based on the 2010-2014 5-year period. The FEIS includes and updated analysis which utilized this newer data.

With regards to subsidized housing, page 3.41 of the DEIS notes that the same historic analysis was conducted after controlling for the change in the number of households that receive some kind of HUD assistance during the same time period. This includes all subsidized housing build in part with HUD funding as well as tenant-based housing vouchers. As noted in the DEIS, this analysis resulted in the same general relationship between housing production and change in low income households shown on page 3.41. Subsequent to publication of the DEIS, more comprehensive historic data about the construction of subsidized housing has been developed. Section 3.1 in the FEIS includes an updated analysis which more fully accounts for households living in subsidized. Please see also Appendix M.

4. The DEIS does not adequately assess impacts of MHA on the supply of unsubsidized low income and very low income housing.

Exhibit 3.1-19 on page 3.21 of the DEIS presents the best available on the cost of Seattle's unsubsidized rental housing stock by affordability level based on a Fall 2016 rental market survey. It indicates that the current supply of housing that is affordable to low-income households is very small. This applies to both larger apartments complexes (20 units or more) as well as smaller complexes (4-19 units).

Exhibit 3.1-39 on page 3.56 of the DEIS presents estimates of the number of physically displaced low-income households (50 percent of AMI or less) by alternative and compares this to the estimated number of new affordable units to be built. Estimates of the total number of demolished units that are not already permitted are presented in Exhibit 3.1-38 on page 3.55.

As this is a programmatic EIS, it does not include a detailed parcel-by-parcel assessment of the current affordability of unsubsidized units susceptible to redevelopment. See also frequent comment response concerning individual urban village review. The DEIS does discuss current economic pressures that are shaping the cost of unsubsidized housing in units throughout the city.

5. The DEIS underestimates historic physical displacement trends.

As noted on page 3.30 of the DEIS, Tenant Relocation Assistance Ordinance (TRAO) records are the best available source of data about physical displacement of households due to the demolition and redevelopment of rental properties, despite known limitations. Discussion of those limitation is provided in the footnote on page 3.30 as well as the text on page 3.33. The DEIS uses these records to estimate the historic percentage of all demolitions that resulted in the physical displacement of a low income household, as discussed

on pages 3.55 through 3.57. These percentages are used to provide an estimate the physical displacement of low income households due to demolition activity that may be expected under each alternative. While these impacts are likely to be underestimated due to limitations in the TRAO data, the degree of underestimation would apply equally to all three alternatives.

Additional analysis is presented in the DEIS to put these numbers into context. Exhibit 3.1-41 estimates cumulative low income households displaced due to demolition, renovation, or change of use, including displacements due to demolitions already permitted. Finally, Exhibit 3.1-38 presents estimates of the total number of demolished units under alternative. Since many demolished homes were owner-occupied before demolition, it is not expected that every demolished unit would result in the involuntary displacement of a household at any income level. Nonetheless, these estimates of total demolished units by alternative provide an upper bound for comparing the potential displacement impacts of each alternative.

6. The DEIS underestimates historic physical displacement trends.

Comment noted. Please also see expanded discussion and analysis in the FEIS of direct, economic and cultural displacement. See frequent comment response concerning impacts on racial and cultural minority groups, and response to Herbold, Lisa.

Freistadt, Jay

1. Prefers either No Action Alternative or Alternative 3; prefers that neighborhood be retained as RSL

Thank you for your comment. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

2. Concern about displacement in the Central District; capacity increases and boundary expansions would exacerbate this

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

3. Concern about privacy and neighborhood character impacts

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as mitigation measures.

4. Concern about transit, parking

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as the Growth with Livability report. Please also see frequent comment response concerning *Impacts to parking*.

5. Concern about local religious institutions

Please see EIS Chapter 3.5 Historic Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Analysis of historic resources*. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

Freitas, Kevin

1. Future Growth should not occur on green space and other parklands.

Thank you for your comment. Comment noted.

Frum, R David

1. Concern about urban village boundary expansion in Roosevelt; find ways of increasing housing within existing single family code

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see discussion of urban village boundary expansion areas identified in the Seattle 2035 Comprehensive Planning process. Please also see frequent comment response concerning *Individual urban village review*

Fuhr, Richard

1. Concern about Ravenna-Bryant neighborhood, including parking problems

Please see frequent comment responses concerning *Impacts to parking* and *Individual urban village review*

Fuller, Joe

1. Future Growth should not occur on green space and other parklands.

Thank you for your comment. Comment noted.

Fulton, JR

1. Commenter prefers Alternative 2 or 3

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

Geenen, Hugh

1. **Not in favor of Alternative 1, prefers Alternative 3 for Ballard, further expansions of urban village boundaries, zone changes in single family areas**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see discussion of urban village boundary expansion areas identified in the Seattle 2035 Comprehensive Planning process.

2. **Recommendations for Ballard urban village; in favor of density mitigating environmental and social impacts**

Please see EIS chapters 3.1 Housing and Socioeconomics, 3.2 Land Use, and 3.4 Transportation for discussion of impacts and mitigation measures, as well as the Growth with Livability report.

3. **Concern that Ballard needs more capacity for future light rail**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

4. **Request for zone change to 3200 block of Market Street to Lowrise zoning**

Thank you for your comment. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Existing multifamily and commercial areas outside existing or expanded urban villages are generally not proposed for zone changes beyond the M tier. Single family areas outside existing or expanded urban villages are not proposed for zone changes. The area in question is a single family area outside of an existing urban village or expansion area. The change requested is not included in the preferred alternative.

5. **Recommendation to remove parking minimum citywide**

Please see frequent comment response concerning *Impacts to parking*. Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as the Growth with Livability report.

6. **Recommendation to change single family zones citywide**

Please see frequent comment response concerning *Single family zones outside the study area*.

7. **Interest in corner stores**

Thank you for your comment. Your comment is noted, however it falls outside the scope of this EIS and therefore no response is provided.

8. Concern about climate change

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see discussion of urban village boundary expansion areas identified in the Seattle 2035 Comprehensive Planning process, as well as climate change mitigation goals of the plan.

Gelb, Jacob (Bellweather Housing)

1. Requests that a specific parcel on 37th Ave S be rezoned entirely to NC-55.

Thank you for your comment. Comment noted. Please see the Preferred Alternative map for the Othello urban village.

2. Requests that a portion of a specific parcel near to Rainier Ave S be rezoned from NC-40 and SF to LR2.

Thank you for your comment. Comment noted. Please see the Preferred Alternative map for the area. Since the rear portion of the property east of Wolcott Ave S is currently zoned single family and is outside of an urban village, for consistency with the approach taken for all other areas of the city, the Preferred Alternative retains existing Single Family zoning on the easternmost portion of site. See frequent comment response regarding single family areas outside of urban villages.

However, a feature of the Preferred Alternative is also supporting development of affordable housing on sites under the purview of affordable housing providers. A Lowrise 2 designation for the eastern portion of the lot would achieve this objective and would generally be supported on those grounds. Rezoning the eastern portion of the site from single family to the Lowrise 2 zone as requested could be considered by City Council as part of the legislation to implement MHA. The Lowrise 2 zone on the eastern portion of the property would be expected to result in minor to moderate land use impact, as it would be located adjacent to existing townhouse development to the south. If transportation and utility access is provided internal to the properties as described in the comment, no further environmental impact in those areas would be expected. Therefore, the designation of LR2 for the eastern portion of the property would not be expected to result in significant impacts exceeding those evaluated in the EIS. Modification of the zoning designation from NC-40 to LR2 for the middle portion of the property would be a lesser intensity land use than evaluated in the alternatives and would not result in additional impact.

Gellert, Nicholas

1. DEIS does not address alternatives in each urban village nor cumulative effects with other changes

Please see frequent comment responses concerning *Individual urban village review* and *Cumulative impacts*.

2. Inadequate assessment of transportation impacts

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as the Growth with Livability report.

3. Concern about pedestrian transportation

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as the Growth with Livability report. Also note that development standards include sidewalk requirements.

4. Concern about public transit capacity

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as the Growth with Livability report.

5. Concern about impacts to parking

Please see frequent comment response concerning *Impacts to parking*.

6. Concern about impacts of density on recreational space, insufficient mitigation measures

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures.

7. Concern for impacts on stormwater and sewer infrastructure

Please frequent comment response concerning *Impacts to sanitary sewer systems* and *Impacts to Stormwater Infrastructure*.

Gensler, Ann

1. Supports comments and conclusions of the Madison Miller Park Community Group.

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Gilman, Mary Jean

1. Commenter opposes Crown Hill zone changes without planning process

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix H Zoning Maps. Note that Nothing in this proposal impedes the ability of the City to pursue community planning in Crown Hill concurrent with badly needed affordable housing.

2. Concern about new development replacing existing affordable housing

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that MHA is a new program aimed at addressing housing affordability both through requirements for affordable housing with development and increasing supply overall.

3. Concern about bulk and scale impacts on single family residences, including resale value

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, many of which include family-size units such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas allows for more family-size and family-style housing in areas that are currently zoned single family. Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as mitigation measures.

4. Concern about impacts to green space and trees; trees should be protected

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures. Please also see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

5. Bulk, height and density should be concentrated around arterials and properly buffered from single-family residential areas; concern about driveways along property lines

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program included in mitigation measures. Note that prioritizing capacity increases only along arterials conflicts with MHA implementation guidelines which include human health and equity outcomes.

6. Public transit is inadequate and Crown Hill and Ballard should have light rail

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

7. Concern about inadequacy of streamlined design review

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as mitigation measures.

8. Concern about stormwater runoff

Please see frequent comment response concerning *Impacts to Stormwater Infrastructure*.

9. Concern about parks and open space deficit in Crown Hill

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures. Please see frequent comment response concerning *Individual urban village review*.

10. Impact fees under consideration are inadequate; concern for parks, open space, police, fire, and schools

The proposal is aimed at providing additional affordable housing so the City intends to pursue mitigation measures that will alleviate impacts while still achieving the goal of improved housing affordability. Nothing in this proposal impedes the ability of the City to pursue implementation of an impact fee program.

11. Concern about stormwater runoff

Please see frequent comment response concerning *Impacts to Stormwater Infrastructure*.

12. Concern about police level of service and increases in crime related to density

Please see EIS Chapter 3.8 Public Services and Utilities for discussion of impacts and mitigation measures.

13. Concern about availability of affordable and adequate potable water

Please see EIS Chapter 3.8 Public Services and Utilities for discussion of impacts and mitigation measures.

14. Concern for air quality and inadequate bus service

Please see EIS Chapter 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures.

Gibb, Janet

1. Concern about 20th Ave NW inclusion in Action Alternatives urban village boundary expansions, including parking, pedestrian infrastructure, and more

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives and Appendix H Zoning Maps.

The requested change to the proposed urban village expansion area boundary has been included in the preferred alternative.

2. Include single family areas not in the study area for zone changes and MHA

Please see frequent comment response concerning *Single family zones not in the study area*.

Gilmore, Matt

1. Concern for protecting neighborhood

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as the Growth with Livability report.

2. Request to keep density along major roads

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that prioritizing capacity increases only along arterials conflicts with MHA implementation guidelines which include human health and equitable outcomes.

3. Concern about losing livability

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as the Growth with Livability report.

Goetz, Kristina

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

2. South Park has unique environmental needs and needs resources to conduct genuine, effective outreach.

Thank you for your comment. For a discussion of outreach conducted for the DEIS, please see the discussion of the community engagement process in the Frequent Comment Responses.

Goetz, Kristina

1. Concern about zone changes in South Park, a traditionally marginalized neighborhood

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement as well as correlations between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

2. Concern about property taxes and rents

Comment noted. Please see additional discussion in the FEIS section 3.1.2 impacts, of impacts of property tax increases on homeowners.

3. Preserve current housing stock and single family zoning

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

4. Concern about maintaining diversity of neighborhood

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement as well as correlations between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

5. Concern about cost of homes in new development, loss of historic homes, interest in small density increases that keep character

Please see EIS Chapter 3.5 Historic Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Analysis of historic resources*. Please also see EIS Chapter 3.3 Aesthetics and Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study. Please also see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

6. Desire for green space and amenities

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures.

7. Concern about transit infrastructure

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as the Growth with Livability report.

8. Concern about impacts to air quality

Please see EIS Chapter 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures, frequent comment responses concerning *Impacts to tree canopy* and *Individual urban village review*, as well as the Growth with Livability report.

Goldenberg, Eldan

1. Commenter supports Alternative 3 for Madison-Miller

Thank you for your comment. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix H Zoning Maps.

2. Concern about missed opportunity to expand Madison-Miller urban village, with less housing added to very walkable area

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see discussion of urban village boundary expansion areas identified in the Seattle 2035 Comprehensive Planning process.

Goldman, Michael

1. How are number of affordable housing units estimated? Why is there a dropoff in the second decade of the planning horizon?

See methodology for estimating growth at Appendix G. The estimates for growth, and the resulting MHA affordable housing unit production, are updated since the scoping phase handout.

2. The historic analysis of housing development and change in low income households is invalid because it does not account for differences in census tract population. It also misinterprets a broader economic trend of increasing income disparity as evidence that housing production does not result in displacement. [Comment 2]

Economic displacement and increasing income disparity are two different but related phenomena that are analyzed separately in the DEIS. Pages 3.34 and 3.35 present a discussion of rising income disparity in Seattle. Exhibit 3.1-26 shows that the city gained both lower and upper income households while losing middle-income households. As a result, the city as a whole experienced increased income disparity during the period of analysis.

The issue of displacement is discussed on page 3.29. It occurs when a household is compelled to move from their home involuntarily, often due to economic pressures. It is possible for a neighborhood to grow and experience increased income disparity without displacing any existing households. For instance, a census tract that is growing in households and population primarily at the upper end of the income spectrum could gain low income households even while the percentage of all households that are low income drops. This drop in percentage share would not be an indicator of the displacement of low income households because the total number of low income households did not drop.

One indicator that economic displacement may be occurring in a neighborhood is the loss in the total number of low income households. The analysis presented in on pages 3.37 through 3.42 explores whether there may be a historic relationship between new housing production and the loss of low income households. The analysis focused on totals instead of percentage change in order to fully account for the gain or loss of low income households. This analysis was not attempting to evaluate whether new housing production is contributing to increasing income disparity at the neighborhood scale.

Gonzales, Ruel

1. **Suggestions concerning the minimum size and features of low-income housing units.**

The commenter states that as a low-income person she would rather pay for a smaller space if it means she can keep more of her income. Comment noted. Thank you for your comments.

Proposed MHA implementation under the action alternatives would allow for and encourage the construction of relatively smaller housing units in certain zones including the Lowrise 1 zone, Residential Small Lot zone.

2. **Is it possible to raise the percentage of low-income unit requirements?**

Please see frequent comment response regarding MHA affordable housing requirements.

3. **Comments regarding the percentage of low-income unit requirements, and how they should be based on average rent in the area.**

Comment noted. MHA affordable housing requirements would vary based on market area of the city. Please see discussion in Chapter 2, and see Appendix E Map of MHA Areas. Please also see frequent comment response regarding MHA affordable housing requirements.

Goodman, Jeremy

1. **Concern for increasing cost of rent**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that MHA is a new program aimed at addressing housing affordability both through requirements for affordable housing with development and increasing supply overall.

2. **Concern about impacts of microhousing**

Please see EIS Chapter 3.3 Aesthetics for discussion of impacts as well as mitigation measures. Please also see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

3. **Concern about building standards**

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as mitigation measures. Note that the Seattle Building Code includes safety standards based on the International Building Code, which has more stringent safety standards today than at any time in history.

4. **Concern about impacts to different racial groups**

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between

housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

5. Concern about fire safety standards

Please see comment response #3 above.

6. Concern about loss of single family homes

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle's single family zoned land.

7. Concern about loss of green space and vegetation

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures. Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

8. Concern for family-friendly housing

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, many of which include family-size units such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas allows for more family-size and family-style housing in areas that are currently zoned single family.

Note also that the proposal includes family-size unit requirements for both market rate and affordable housing performance. Also note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing.

Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

9. Concern about equity

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include "9. Evaluate MHA implementation using a social and racial equity/justice lens."

10. Concern about property taxes

Comment noted. Please see additional discussion in the FEIS section 3.1.2 impacts, of impacts of property tax increases on homeowners.

11. Recommendation to add capacity in less desirable areas

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix C MHA Implementation Principles, which include “Ensure MHA program creates affordable housing opportunities throughout the city” and “Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.” Locating more housing near transit and amenity-rich areas helps meet goals for reducing car trips and increasing transit use, which support climate mitigation, equity, and livability goals.

12. Concern about loss of single family homes

Please see comment response 8 above.

13. Add capacity near light rail and other transit

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix C MHA Implementation Principles, which include “Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.” Locating more housing near transit and amenity-rich areas helps meet goals for reducing car trips and increasing transit use, which support climate mitigation, equity, and livability goals.

14. Concern about Seattle as a place unfriendly to families

Please see comment response #8 above.

15. Interest in ADUs & DADUs

Please see EIS Chapter 3.2 Land Use for discussion of Comprehensive Plan policies which include goals for accessory dwelling units. Also note that the City is currently considering policy to remove barriers to ADUs and DADUs.

Goodwin, Amanda

1. DEIS does not make assessment of local impacts including traffic, parking, infrastructure, and cumulative impacts of other projects

Please see frequent comment responses concerning *Individual urban village review* and *Cumulative impacts*.

2. Concern about amount of affordable housing relative to zone changes

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that MHA is a new program aimed at addressing housing affordability both through requirements for affordable housing with development and increasing supply overall. Please also see EIS Chapter 3.1 Housing and Socioeconomics as well as the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses payment dollars to fund acquisition and rehabilitation of existing housing.

3. Concern about unclear Future Land Use Map

Please refer to the Seattle 2035 Comprehensive Plan update for more information and maps, including the Future Land Use Map. http://www.seattle.gov/dpd/cs/groups/pan/@pan/documents/web_informational/p2580242.pdf

4. City fails to honor neighborhood plan

Please see comment response to Barker, Deb concerning consistencies within the Seattle 2035 Comprehensive Plan.

5. DEIS fails to accurately describe existing neighborhood character and impacts in West Seattle; fails to propose meaningful aesthetics mitigation

Please see frequent comment responses concerning *Individual urban village review*. Please also see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as mitigation measures. Please also EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

6. DEIS does not include meaningful transportation data for West Seattle, including emergency services

This is a programmatic DEIS addressing area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects required are also unknown. Individual development projects will undergo separate and more detailed SEPA review; including traffic impact analysis, and specific mitigation will be determined at that time.

The metrics used to identify transportation impacts were screenlines, mode share, and total transit boardings. Pedestrian & bicycle, safety, and parking were also examined at a higher level.

The City of Seattle has policies and parking regulations that relate to the commenter's concerns regarding parking near pedestrian crossings. The commenter is encouraged to contact SDOT if there are enforcement issues that need to be addressed. Regarding emergency vehicle access, Seattle has long had narrow streets with on-street parking served by emergency vehicles. SDOT works

closely with the Fire Department to maintain access to properties throughout the city. The Fire Department had the opportunity to comment on this EIS and had no comments on emergency vehicle access impacts related to the proposed legislative action.

7. DEIS fails to propose mitigation for loss of green space

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures. Please also see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

8. Analysis is flawed, lack of adequate infrastructure to support proposal

The proposal is aimed at providing additional affordable housing so the City intends to pursue mitigation measures that will alleviate impacts while still achieving the goal of improved housing affordability.

9. Fails to note lack of school capacity

Please see frequent comment response concerning *Impacts to Seattle Public School capacity*

Goplen, Susan

1. Do not increase housing capacity without increasing school capacity.

Comment noted. Please see additional analysis in the FEIS of school capacity in Section 3.8. Please also see mitigation measures.

Graves, David

Thank you for your comments on behalf of Seattle Parks and Recreation (SPR). Since publishing the DEIS there has been additional coordination and discussion to address these comments. Suggestions for revision and clarification by SPR are included in full in the FEIS.

1. Why are impacts identified as significant?

A threshold for significance for the purpose of the analysis is whether the alternative would cause exceedance of the citywide population-based level of service standard. There are no direct impacts to parks and open space as the comment notes. However, the decrease in availability of parks and open space facilities is identified as an impact. Please see expanded discussion of mitigation measures in the FEIS that would mitigate impacts.

2. What is a substantial gap in the open space network.

Comment noted. In the DEIS the term was used to identify areas with open space gaps over half of the urban village, consistent with information from the 2011 Parks Development Plan. To address the comment, in the FEIS, the metric is revised to the underserved urban

villages, as identified in the newly adopted 2017 Parks and Open Space Plan.

3. Decouple the walkability guidelines from the Level of Service discussion.

Comment noted. To address the comment, in the FEIS, the metrics are revised to use the newly adopted 2017 Parks and Open Space Plan. Since the 2017 plan included identification of underserved urban village, this is analyzed in place of the walkability metric that was included in the DEIS.

4. Where did the population number come from for Alternative 2 and 3?

It is acknowledged that SPR's analysis is based on the growth projections provided by the Puget Sound Regional Council, and adopted in the Seattle 2035 Comprehensive Plan. For the purposes of a conservative analysis of potential impacts, the MHA EIS studies the potential for additional growth under the action alternatives. See discussion in Chapter 2.

Green, Rahsaan

1. The comment document requests completion of an EIS pertaining to just the South Park neighborhood. The comment document notes that South Park has serious environmental issues, and expresses concern about notice and public engagement.

Comments noted. Thank you for your comment. Please see frequent comment responses concerning individual urban village review and community engagement. Please see also Appendix B. Please see the Preferred Alternative map at Appendix H for South Park. In recognition of constraints in South Park, the minimum zoning changes necessary to implement MHA are proposed for the South Park area. This approach is consistent with the approach proposed for areas outside of urban villages under the action alternatives.

Greene, Will

1. Commenter prefers Alternative 3 and supports Alternative 2, and supports zone changes across the city including single family neighborhoods

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see discussion of urban village boundary expansion areas identified in the Seattle 2035 Comprehensive Planning process.

2. Interest in denser city that is safer, more affordable, with more street life; bulk regulations should not impact unit count

Please see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

Please also see EIS Chapter 3.1 Housing and Socioeconomics which includes growth projections with MHA.

Griffen, Penny

1. **Concern about coordination with neighborhood councils; neighborhood planning in Crown Hill should occur before zone changes**

Thank you for your comment. Your comment is noted, however the first portion is not specific to the analysis and therefore a response is not provided.

The proposal is aimed at providing additional affordable housing so the City intends to pursue mitigation measures that will alleviate impacts while still achieving the goal of improved housing affordability. Nothing in this proposal impedes the ability of the City to conduct neighborhood planning.

2. **Concern about development not resulting in more affordable housing**

Please see EIS Chapter 3.1 Housing and Socioeconomics as well as the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses payment dollars to fund acquisition and rehabilitation of existing housing. Please also see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that MHA is a new program aimed at addressing housing affordability both through requirements for affordable housing with development and increasing supply overall.

3. **Concern about need for more green space**

Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures. Please also see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures.

4. **Concern about loss of tree canopy**

Please see frequent comment response concerning *Impacts on tree canopy*.

5. **Interest in taller buildings along arterials, but out of scale with interior of neighborhoods**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that prioritizing capacity increases only along arterials conflicts with MHA implementation guidelines which include human health and equitable outcomes. Please also see EIS Appendix C MHA Implementation Principles, which include "Transitions: Plan for transitions between higher- and lower-scale zones as additional development capacity is accommodated."

6. Concern about bus service

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as the Growth with Livability report.

7. Concern about stormwater runoff, transit service, and parking

Please see frequent comment response concerning *Impacts to Stormwater Infrastructure*, response to comment 6 above, and frequent comment response concerning *Impacts to parking*.

8. Concern about police response times

Please see EIS Chapter 3.8 Public Services and Utilities for discussion of impacts and mitigation measures.

Griffith, Greg**1. The EIS shows that historic properties will be demolished or disturbed under all three alternatives.**

Thank you for your comment. Your comment is noted. Because the Alternatives are proposing zoning and policy changes, none of the alternatives would result in direct impacts to historic or cultural resources. Direct impacts have the potential to occur at a project level, which would be subject to existing project-level review under applicable existing City permitting requirements and design review thresholds.

As a Programmatic EIS, it is impossible to predict where redevelopment will occur. Demolition of historic buildings could occur under all Alternatives; however, identification and evaluation of potential historic resources and potential historic districts would still occur at the project level under applicable existing City permitting requirements and design review thresholds. As a Programmatic EIS, site-specific analysis is not required by SEPA (WAC 197-11-442).

Potential impacts to each urban village are analyzed in Chapter 3.5 regarding the potential growth rates under each alternative. Urban villages with high growth rates were identified as areas where there is higher potential for impact to the overall historic fabric of the urban village. Proposed rezoning changes were also analyzed for potential impacts to historic resources due to the potential for changes in scale. Analysis of the potential impacts to scale is also provided in Section 3.3 (Aesthetics), and Section 3.2 (Land Use).

2. MHA should use new historic preservation tools and programs to provide affordable housing options.

Thank you. Your comment is noted.

3. **Mitigation measures for impacts on historic resources do not appear effective. Examine using historic preservation incentives or other tools to preserve archaeological, historic resources, and affordable housing.**

Comment noted. Under all Alternatives, identification and evaluation of potential historic resources and potential historic districts would still occur at the project level under applicable existing City permitting requirements and design review thresholds. Under all Alternatives, existing local and national historic districts would be excluded from proposed zoning changes and MHA requirements. Potential future impacts to newly created historic districts would be considered at an individual basis at the time of designation.

4. **Concern that SEPA-exempt thresholds could lead to projects affecting historic resources without review.**

Your comment is noted. The mitigation measures proposed in the Draft and Final EIS could reduce potential impacts to historic resources through lowering the thresholds for project-level historic resources review, creating additional historic context statements and proactively nominating resources for landmark review, and prioritize funds for seismic retrofitting of unreinforced masonry buildings that meet eligibility requirements. Additional mitigation measures are included in the Final EIS.

Grisold, Mark

1. **Extend the DEIS comment period.**

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Grisold, Mark

1. **Extend the DEIS comment period.**

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Gruber, Nancy

1. **Commenter opposes Alternative 3. Opposes expansion of urban village to 20th Ave NW in the Crown Hill urban village.**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives and Appendix H Zoning Maps.

The requested change to the proposed urban village expansion area boundary has been included in the preferred alternative.

2. Frustration over lack of City responsiveness to community requests.

Please see frequent comment response concerning *Community Engagement*.

3. Concern about building heights; prefers 5-6 stories.

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as mitigation measures. Please also see Please see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

4. Interest in maintaining commercial on ground floor.

Please see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study, including discussion of requirements for Neighborhood Commercial zoning, and incorporated plan elements including a small commercial space requirement in pedestrian zones.

5. Interest in an art element plan.

Thank you for your comment. Your comment is noted. Though it is not specific to the analysis, it will be considered in future City work.

6. Interest in bike parking where there are no parking requirements.

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as the Growth with Livability report. Please also see the Bike Master Plan.

7. Interest in pedestrian safety.

This is a programmatic DEIS addressing area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects required are also unknown. Individual development projects will undergo separate and more detailed SEPA review; including traffic impact analysis, and specific mitigation will be determined at that time.

Pedestrian & bicycle safety and parking were examined. As stated in Exhibit 3.4-49, there is a parking impact identified for all three alternatives.

Please also see the Pedestrian Master Plan.

8. Request to keep pedestrian overpass to Crown Hill Park across Holman Road.

This is a programmatic DEIS addressing area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects required are also unknown. Individual development projects will undergo separate and more detailed SEPA review; including traffic impact analysis, and specific mitigation will be determined at that time.

9. Concern about stormwater drainage and problems in winter.

Please see frequent comment response concerning *Impacts to Stormwater Infrastructure*.

Guess, Carl

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Hacker, Tony

1. The EIS does not recognize and examine unique features of each urban village. Each Urban Village is unique, with different housing types, cultural traditions, businesses, resources, and growth needs. Each urban village should have an individual environmental review.

Thank you for your comment. Comment noted.

Hale, Ashly

1. Comment concerning Beacon Crossing development on Beacon Ave & 15th – concern about parking and interest in retail

Thank you for your comment. Your comment is noted, however it is not specific to the proposal and its environmental analyses and therefore no response is provided.

Hale, Jeannie (Laurelhurst Community Club)

1. The EIS falls short and only generally acknowledges the role of Historic Resources, and offers no real protection.

Comments noted. Please see frequent comment response concerning historic resources. Please see also response to Woo, Eugenia.

2. Concern about potential loss of small local businesses.

Comments noted. Please see additional discussion in the FEIS of cultural displacement impacts.

3. Concern about potential impact to existing housing stock that provides relatively affordable housing.

Comments noted. Please see discussion of direct, economic and cultural displacement in Section 3.1 Housing and Socioeconomics. Please also note that there is not currently an affordable housing requirement for new development in Laurelhurst. Implementation of

MHA under any action alternative would require new development to contribute towards affordable housing.

4. Consider more rigor in the Historic Resources section 3.5.

Comments noted. Please see response to Woo, Eugenia. Please also see additional language provided in FEIS Section 3.5, including additional discussion of mitigation measures.

Hall, Cameron

4. Supports option that affords the most density.

Thank you for your comment. Comments noted.

Hall, Charles (Capitol Hill Housing)

5. Generally prefers Alternative 2 for the Capitol Hill-First Hill Urban Village with its emphasis on larger upzoned areas around the Capitol Hill Light Rail station and east of Broadway.

Thank you for your comment. Comment noted. Please see the Preferred Alternative map for the urban village at Appendix H. Please also see discussion of the approach for the Preferred Alternative in Chapter 2.0. Proximity to transit is a factor of emphasis in the Preferred Alternative.

6. Recommends relatively larger rezones for sites within urban villages and near transit to maximize density and supply of affordable housing.

Comments noted. Under the Preferred Alternative sites under site control by non-profit affordable housing providers or otherwise identified as sites with high likelihood of development as affordable housing have relatively greater zoning increases applied, including specific sites identified in the comment.

Hall, Steve (Friends of Historic Belltown)

7. The EIS does not disclose probable significant adverse impacts on historic resources or address alternatives to address impacts.

Thank you for your comment. Please see frequent comment response concerning historic resources. Please see also response to Woo, Eugenia. Please note that designated historic districts are excluded from MHA implementation in all alternatives.

8. Loss or destruction historic resources is a significant adverse impact.

Comments noted. There is no direct impact to historic resources as discussed in Section 3.5 Historic Resources. Potential indirect impacts are identified for the action alternatives.

9. Historic resources are present within the affected environment.

Comments noted.

10. The EIS acknowledges that action alternatives would result in historic resources being lost or destroyed.

Please see discussion of indirect impacts to historic resources under all alternatives.

11. The DEIS fails to formally identify impacts of that would result from the action alternatives.

Please note that the discussion in the draft and final EIS in the impacts common to all alternatives subsection in Section 3.5 addresses all action alternatives, because impacts to historic resources would be similar under the action alternatives. Specific discussion under Action Alternative 2,3 and the Preferred Alternative focuses on aspects of the impacts that would be different from the discussion under impacts common to all alternatives. Please see also additional discussion of impacts and mitigation measures in the FEIS.

12. The DEIS relies on faulty logic in determining no significant adverse impacts.

Thank you for your comment. Please see additional language and clarifications in the subsection in the FEIS.

13. Recommendation to supplement the EIS, and develop alternatives that programmatically address probable significant adverse impacts.

Thank you for your comment. Please see additional discussion in the FEIS of impacts and mitigation measures.

Hammock, Jeannie (Pecos Barbeque)

1. Requests zoning change to NC3-75 for parcels in use as existing parking on single-family zoned parcels to the east of the restaurant.

Comments noted. Please see the Preferred Alternative map for the West Seattle urban village at Appendix H. A zoning change to a Lowrise multi-family zone is included in the Preferred Alternative. Discussion included in the comment letter could be used to support possible amendment of the proposed designation on the parcel in question during the legislation review process to implement the proposed action.

Hannah

1. Request that the City take one of the actions

Thank you for your comment. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for

proposed zone changes. Please also see EIS Appendix H Zoning Maps.

2. Concern for family-size housing

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, many of which include family-size units such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas allows for more family-size and family-style housing in areas that are currently zoned single family.

Note also that the proposal includes family-size unit requirements for both market rate and affordable housing performance. Also note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

Hannum, P Mark

1. Commenter prefers No Action Alternative in North Rainier urban village; would impede landmark designation process underway

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as the Growth with Livability report. Nothing in this proposal impedes the ability of the neighborhood to pursue landmark designation status.

2. Recommends adding housing capacity elsewhere in the North Rainier urban village

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see discussion of urban village boundary expansion areas identified in the Seattle 2035 Comprehensive Planning process.

3. Recommends adding housing capacity adjacent to Rainier Ave corridor without including single family areas

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that prioritizing capacity increases only along arterials is in conflict with MHA implementation guidelines which include human health and equity outcomes.

4. Concern about risk to fabric of turn of the century neighborhood

Please see EIS Chapter 3.5 Historic Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Analysis of historic resources*.

5. Concern that 10-minute walkshed methodology does not account for topography

Please see response to comment #2 above.

6. Concern about changing aesthetics of neighborhood if zone changes implemented

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as mitigation measures.

7. Concern about maintaining original intention of the neighborhood

Please see response to comment #6 above.

8. Concern about carbon footprint of new development replacing older homes

Please see EIS Chapter 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures.

Hardy, Karen

1. Concern about zone changes in Roosevelt and preserving Ravenna Park and its neighbors

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, many of which include family-size units such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas allows for more family-size and family-style housing in areas that are currently zoned single family.

2. Concern about change to proposal with DEIS

Please see MHA Draft 1 zone change maps, published October 2016, which show a study area similar to that which is included in the DEIS.

3. DEIS does not address individual neighborhoods or include conversation with people in those neighborhoods

Please see frequent comment responses concerning *Individual urban village review* and *Community engagement*. Please also see EIS Appendix B for a discussion of the MHA community input process and a summary of input received.

4. Concern about zone changes in Ravenna single family areas

Please see response to comment #1 above. Also see frequent comment responses concerning *Individual urban village review*.

5. Concern about high rise projects underway not including affordable housing; MIL units are better suited to the neighborhood

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. It is unlikely that a project already permitted is voluntarily contributing to affordable housing development through MHA, however many developments include MFTE housing which serves low-income community members. Note that MHA is a proposal that would require affordable housing with all new multifamily and commercial development where no requirement exists today. Also note that the City is evaluating development of a policy proposal that would remove barriers to mother in law apartments and backyard cottages.

6. Concern about preservation of neighborhood character and natural areas

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as mitigation measures. Please see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study. Please also see Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

7. Concern about preservation of neighborhood character and natural areas

Please see response to comment #6 above.

8. Concern for preserving quality of life

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as mitigation measures. Please see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study. Please also see Growth with Livability report.

9. Interest in maintaining urban village boundary along 15th Ave NE; question as to whether development underway includes affordable housing

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see discussion of urban village boundary expansion areas identified in the Seattle 2035 Comprehensive Planning process.

Please also see response to comment #5 above.

Harrison Rob

1. **EIS does not analyze the impact of the MHA affordability requirement on future production of housing.**

See the response to the comment offered by Dan Bertolet.

2. **Can measures be taken to allow more housing types in single family zones that would increase density and affordability.**

Comment noted. This EIS is to analyze impacts to the built and natural environment resulting from application of mandatory housing affordability requirements and associated changes in allowed density and height. Other efforts to increase housing supply and affordability will be subject to their own environmental review.

3. **The current Green Building Incentive adds a very small increment of FAR and additional height that won't offset the increased costs. The Green Building Incentive ought to be considered at the same time as these upzones and MHA fees are considered.**

See the response to 2, above.

Harwell, Kirk-1

1. **MHA should provide a more balanced approach to achieving growth.**

Thank you for your comment. Please see frequent comment response concerning alternatives that could meet the objective. Please also see discussion of direct, economic, and cultural displacement in Section 3.1 Housing and Socioeconomics.

2. **Historic resources Section 3.5 is inadequate.**

Comment noted. Please see frequent comment response concerning historic resources analysis, and comment response to Woo, Eugenia.

3. **The EIS does not connect MHA to URM.**

Comment noted. Please see comment response concerning URM in response to Woo, Eugenia. Please see additional discussion in the FEIS of URM buildings.

4. **The EIS should provide substantive mitigation measures.**

Comment noted. Please see comment response concerning mitigation measures to Woo, Eugenia. Please see additional discussion of mitigation measures in the FEIS.

Harwell, Kirk-2

1. **Confirmation emails were not sent.**

Thank you for your comment. All comments received at the email address are considered and responded to in the FEIS.

2. **Madison-Miller has many significant trees, and significant trees would not be protected for areas converted from single family zoning in the action alternatives.**

Comment noted. Tree protections regulations apply to single family and non-single family zones. Tree removal on developed land is limited in all lowrise, midrise, and commercial zones and on single-family lots 5,000 square feet in area or larger. Please see additional discussion in the FEIS related to tree protection, including expanded mitigation measures.

Harwell, Kirk-3

1. **The City's use of the Displacement Risk / Access to Opportunity Index to determine a generalized approach for rezoning urban villages is flawed.**

Thank you for your comment. Comments noted. Please see frequent comment response concerning use of the displacement risk / access to opportunity typology.

Hattendorf, Ramona

1. **The City and Seattle Public Schools should rely on Impact Fees to fund schools and other city services as growth occurs.**

Comment noted.

2. **There is a lack of coordinated planning with Seattle Public Schools and analysis of impacts on Seattle Public Schools is not sufficient.**

The Draft EIS analyzed impacts on Seattle Public Schools (SPS) generally, as required by SEPA Rules for programmatic proposals (WAC 197-11-442(3)), which allow non-project proposals, such as the MHA proposal, to be evaluated broadly. The nature of the programmatic MHA proposal presents an implementation timeframe of 20 years while SPS typically plans their projections in 5 year cycles. In the Draft EIS, each sector and respective urban village within the study area was identified and considered at a programmatic level within the limits of a feasible timeline. The SPS 2012 Facilities Master Plan was used to identify enrollment projections through 2022 as well as existing capital programs that are in place. Impacts and mitigation were identified based on readily available information and past SPS planning efforts to address capacity and enrollment issues.

Programmatic proposals can include a focus on areas of specific concern (WAC 197-11-442(4)). In the instance of public schools, this includes issues of capacity and enrollment. While the information presented in the MHA Draft EIS is both accurate and relevant, anticipatory data through coordination with SPS has assisted in analyzing impacts and mitigation more precisely. Further information needs were identified and close coordination with SPS provided a more defined analysis of enrollment, capacity estimates and the SPS planning cycle. The Final EIS expands on the Draft EIS analysis to

include an examination of projected housing growth as a result of the MHA proposal, the estimated student generation as a result of the MHA proposal, the challenges that SPS encounters with capacity exceedance, and potential mitigation measures to address these challenges within the context of the SPS planning cycle.

3. Do not conflate test scores to access to learning or equity.

Fourteen criteria are used in the access to opportunity index for urban villages. School performance based on elementary and middle school test scores, high school graduation rates, and access to a college or university are education-related criteria in the index. High performing schools and access to higher education in an area of the city are among the factors considered in identifying the geographic locations that provide high access to opportunity for residents. Alternatives in the EIS including the Preferred Alternative feature an approach that would direct relatively more new housing to high opportunity areas. The intent is to allow a greater number of residents, including low-income and racial and ethnic minority residents to benefit from living within a high opportunity area.

As seen in additional analysis of school capacity described in the FEIS, it is true that some high opportunity urban villages also have school service areas that are at or near to capacity. As described in FEIS Section 3.8 It is expected that SPS would continue to employ current and new practices to increase physical capacity at existing schools and continue to open new schools in capacity constrained school service areas. The FEIS includes additional discussion of mitigation measures for school capacity constraints.

Haury, Paul

1. The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

Hayward, Lisa

1. The proposed changes will impact our quality of life by replacing yards that provide tree canopy and gardens with impermeable surfaces.

Thank you for your comment. Please see the discussion in section 3.6 for an analysis of citywide impacts related to tree canopy and environmentally critical areas. The majority of the zoning changes add development capacity to existing multifamily zones minimizing potential increases in permeable surfaces above what would occur today and resulting in minimal loss of tree canopy. Exhibit 3-11 provides a Tree Canopy Analysis by zone.

2. Parking, traffic and noise will increase as a result of the zone change on our block.

Please see the response under frequent comment responses regarding parking impacts and mitigation. The Draft EIS did include a study of potential traffic impacts and mitigation measures. Please see section 3.4.2 of the Draft EIS for an analysis of traffic impacts.

Heavey, Anne

1. Commenter is not in favor of Alternative 3; in Morgan Junction, this would ruin the charm and livability of a great neighborhood

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as mitigation measures. Please also see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study for details about compatibility between zone types.

2. Same as comment 1 above

See response to comment #1 above.

3. Same as comments 1 and 2 above

See response to comment #1 above.

4. Concern about traffic and parking impacts

Please see frequent comment response concerning *Impacts to parking*. Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as the Growth with Livability report.

5. Concern that development threatens a particular natural area

This is a programmatic DEIS addressing area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects required are also unknown. Individual development projects will undergo separate and more detailed SEPA review; including natural area impact analysis, and specific mitigation will be determined at that time.

6. Parks are not considered

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures.

Heller, Geoffrey

1. The City and the School District should work together to plan for a school at the Fort Lawton site.

Thank you for your comment. Comment noted.

Herbold, Lisa

1. **Comments request additional analysis related to displacement and race in the Housing and Socioeconomics section.**

Thank you for your comments. Since publishing the DEIS, city staff have met with you to discuss additional information that could be included in the FEIS. Several additional items are included in Section 3.1 as a response, which address direct, economic and cultural displacement. Please refer to the frequent comment response concerning impacts on racial and cultural minority groups for discussion.

Herman, Brandon

1. **DEIS is flawed by studying zone changes on a citywide level, should study impacts to traffic, parking, and infrastructure locally**

This is a programmatic DEIS addressing area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects required are also unknown. Individual development projects will undergo separate and more detailed SEPA review; including traffic, parking, and infrastructure impact analysis, and specific mitigation will be determined at that time.

2. **Concern about economic diversity in West Seattle Junction**

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

Please see EIS Chapter 3.1 Housing and Socioeconomics as well as the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses payment dollars to fund acquisition and rehabilitation of existing housing.

3. **Concern about changes to neighborhood plan policies in the Comprehensive Plan**

Please see comment response to Barker, Deb concerning consistency between Neighborhood Plans and Comprehensive Plan.

4. **Concern about mitigation measures for aesthetics**

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as mitigation measures. Please also see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

5. Data provided for RapidRide C line and commute times are not consistent with conditions observed by neighborhood residents

The 0.67 ratio cited by the commenter relates to King County Metro's Crowding Threshold which allows for more passengers than the number of seats on the bus. A crowding threshold ratio of 1.0 is equivalent to a load factor (ratio of passengers to seats) of 1.25 or 1.50, depending on the route frequency—this represents a situation where all buses over the AM peak period are completely full at some point along their journey. The DEIS acknowledges that some trips within the peak period operate at full capacity. As stated on page 3.204, "some routes, such as the C Line and E Line with ratio greater than 0.64, will have portions of the route with standing room only. The demand used for the analysis is the average of the maximum loads during the AM peak. Some trips may have no capacity, but over the entire peak period, there is capacity on the corridors." Errata for the FEIS will clarify that some trips will be unable to accommodate all passengers resulting in skipped stops. However, the overall transit impact findings remain unchanged.

The ridership data used is the average maximum load of passengers on each bus trip in Fall 2016, averaged over the AM peak period. Transit riders at skipped stops are reflected in the loaded passengers in the following bus trip. Our analysis of the existing data shows that on average during the AM peak period, a C Line bus trip will have standing room only at the busiest segment, which is consistent with the commenter's statement.

6. Transportation mitigation for West Seattle or the Junction is not proposed

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

7. Concern about specific historic buildings

Please see EIS Chapter 3.5 Historic Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Analysis of historic resources*.

8. Concern about building massing, traffic, and impermeable surfaces

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as mitigation measures. Please see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as the Growth with Livability report.

Please see frequent comment response concerning *Impacts to Stormwater Infrastructure*.

9. Parks mitigation measures are not specific

Comment noted. Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures, as well as the policy framework which discusses concurrent measures.

10. Concern about emergency services, sewer lines, stormwater, and lack of mitigation measures provided

Please see frequent comment responses concerning *Impacts to Stormwater Infrastructure* and *Impacts to sanitary sewer systems*. Regarding emergency vehicle access, SDOT works closely with the Fire Department to maintain access to properties throughout the city. The Fire Department had the opportunity to comment on this EIS and had no comments on emergency vehicle access impacts related to the proposed legislative action.

11. DEIS fails to account for school capacity increases

Please see frequent comment response concerning *Impacts to Seattle Public School capacity*.

12. Same as comment #8 above

Please see response to comment #8 above.

Herzog, Laura

1. Commenter opposes zone changes in Ravenna area – should be limited to Roosevelt Square. Opposed to anything other than residential and small business.

Thank you for your comment. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix H Zoning Maps. Please also see discussion of urban village boundary expansion areas identified in the Seattle 2035 Comprehensive Planning process.

Hill, Greg-1

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Hill, Greg-2

1. True alternatives were not considered.

Comment noted. Please see frequent comment response concerning alternatives that could meet the objective.

2. The proposal will reduce housing for families with children and extended families.

Comment noted. Please see frequent comment response concerning family-sized housing. Please also see discussion of development standards in the FEIS at Appendix F for the proposed action alternatives. Density limits are proposed to be retained in the Lowrise

1 and 2 zones for rowhouses and townhouse development, and a density limit would apply in the Residential Small Lot (RSL) zone. A family size requirement is proposed to apply in the Lowrise 1 zone for every development containing four or more dwelling units.

3. The proposal will accelerate the loss of large trees.

Comment noted. Please see discussion and analysis of impacts to tree canopy in Section 3.6.

4. The proposal will accelerate the loss of existing affordable housing.

Comment noted. Please see discussion of affordable housing in Section 3.1 Housing and Socioeconomics. Please also see discussion of direct, economic and cultural displacement in that Section.

5. Studies of previous similar legislation should be provided.

Comment noted. The EIS evaluates potential environmental impacts of implementation of the proposed action.

Holderman, William

2. We would like our entire site to be zoned NC2P-75 so we can dedicate 10% of residential component to affordable housing if we redevelop in the future.

Please see the Preferred Alternative map for the First Hill-Capitol Urban Center in Appendix H. Under the Preferred Alternative the site would have NCP-75 (M1) zoning.

Holliday, Catherine

1. Supports comments and conclusions of the Madison Miller Park Community Group.

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Holliday, Guy (Madison-Miller Park Community Group)

1. Madison-Miller Park Community Group process

Thank you to the Madison-Miller Park Community Group for convening to compile this set of comments. We appreciate the amount of time and effort involved in engaging community members. Please see the preferred alternative map at Appendix H.

2. Implement MHA requirements into existing zoning.

To implement an affordable housing requirement on new development using the State approved approach, an incentive for

new development must be provided to partially offset the cost of imposing the affordable housing requirement. See also Frequent Comment Response Alternatives to MHA that could achieve the objectives.

3. Allow more accessory dwelling units in single family zoned areas citywide and apply MHA requirements to those areas.

See Frequent Comment Response regarding Single Family zones outside the study area.

4. Increase the percentage level and per square foot payment amounts of the MHA affordable housing requirements.

See Frequent Comment Response regarding MHA affordable housing requirements.

5. The DEIS falsely represent Madison-Miller as a Low Displacement Risk / High Access to Opportunity urban village.

See Frequent Comment Response regarding the displacement risk access to opportunity typology.

6. Current zoning will exceed density goals without proposed capacity increase.

A purpose of the proposal to increase development capacity is to implement the mandatory housing affordability requirement for new development. Regarding the quantity of affordable housing units, the objective of the proposed action is to yield at least 6,200 net new rent and income restricted units built in the study area over a 20-year period. Both action alternatives meet and exceed this objective by applying the proposed development capacity increases. See DEIS Exhibit 3.1-36 for estimations of the specific quantities of new affordable housing that would be built in the study area as a whole and in each urban village. The no action alternative would not meet the objective because a mandatory housing affordability requirement for new development would not be put in place.

7. Proposed density increases are not equitable across urban villages.

The action alternatives propose MHA implementation according to a consistent set of principles, and according to a general approach within each alternative. (See Chapter 2.0). Since existing land use and zoning patterns vary widely between urban villages, levels of estimated additional growth that could result from the application of MHA can vary considerably based on those starting conditions. The impacts stemming from additional growth that could occur are analyzed in Section 3.0. The estimated amount of growth that could occur is provided for urban villages in each action alternative on a percentage basis (DEIS Exhibit 2-8), and also in absolute quantities (DEIS Exhibit 2-7) of housing units and jobs. While Madison-Miller does on a percentage basis have higher estimations for percentage increases in housing units compared to Ballard and West Seattle compared to no action, the quantity of additional housing growth in Madison-Miller would be substantially lower than those Hub Urban Villages.

8. Process

See Frequent Comment Response regarding *Community Engagement*.

9. Significant negative impacts

See discussion of potential impacts within each section of Chapter 3 for the EIS alternatives.

10. Support alternative 2 with modifications

See Preferred Alternative map for Madison-Miller Urban Village in Appendix H. See also specific map comment responses beginning at 18 below.

11. Housing and Socioeconomics. Displacement Risk / Access to Opportunity

See Frequent Comment Response regarding the *displacement risk access to opportunity typology*.

An estimate of the amount and location of new rent and income restricted affordable housing units that would result under each alternative is estimated, including for each urban village. While it is difficult to project over a 20 year period where new affordable housing could be located, estimates are provided using a best set of plausible assumptions. See frequent comment response *Location of MHA housing units*.

The amount of direct displacement of low-income households is estimated for each alternative using two methods. (DEIS Exhibit 3.1-40). Under No Action an estimated 278–520 such units would be displaced. For the Action Alternatives, under MHA an estimated 277–596 housing units would be displaced. It should be noted that under the action alternatives many of the same parcels that would be redeveloped under No Action would redevelop under the proposed action, but those redevelopment sites would contain a greater amount of new housing.

Regarding existing rent and income restricted housing in the urban village, housing that is owned by the Seattle Housing Authority (SHA), or a non-profit housing entity is expected to remain permanently affordable, or has a long-term affordability covenant in place. These rent and income restricted buildings would not be affected by MHA implementation. Other low-cost market rate housing without an income-restriction is subject to no guarantee that it would remain affordable. Such existing housing could be subject to rent increases or redevelopment with or without proposed MHA.

The Final EIS includes several additional analyses related to displacement. See frequent comment response *Impacts on racial and cultural minority groups*.

12. Transportation: Link Light Rail is not within a 10-minute walk.

See Section 3.4 Transportation for discussion of transit service. Future Madison-Miller bus rapid transit is included in transportation modelling and analysis. The 10-minute walkshed to frequent transit is not relied upon in the EIS for any urban village expansion for

Madison-Miller. Ten urban villages aside from Madison-Miller are studied for potential urban village boundary expansions (See Section 2.0). In these cases, the estimated 10-minute walkshed is used to identify potential urban village boundary expansion extents.

13. Transportation: Circulation and parking impacts near Meany Middle School

This is a programmatic DEIS that addresses area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects that will be required are also unknown. Individual development projects will undergo separate and more detailed SEPA review during which specific impacts and mitigation (including on local transportation demands) will be determined. Seattle Municipal Code 25.05.675.M.2.b expressly exempts on-street parking impact mitigation for new residential development within “portions of urban villages within 1,320 feet of a street with frequent transit service.”

14. Open Space: There is little neighborhood park or open space, and Miller Park has limited availability for public use.

Section 3.7 calculates open space availability and identifies walkability gaps to open space using available metrics. Miller Park does account for much of the open space that goes into the calculation for Madison-Miller. The DEIS notes that under all alternatives with additional population, growth impacts to parks and open space users may be in the form of 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. Impacts could be greater under the action alternatives due to more population growth. Mitigation measures are identified, including additional measures in the FEIS.

15. Public Services

See Section 3.8 for discussion of stormwater drainage. Existing regulations for the design, location and access to refuse collection in new buildings apply to all alternatives.

16. Historic Resources

Please see frequent comment response concerning historic resources. Please also see response to Woo, Eugenia.

17. Aesthetics: Alternatives 2 and 3 would result in dramatic changes to character.

The EIS describes that some aesthetic impacts could occur in Madison Miller, particularly in areas where (M1) and (M2) capacity increases are proposed. Mitigation measures are included in the proposal to offset potential impacts of new development, specifically building setbacks, façade treatments, and building envelope modulation to reduce visual bulk. While not legally binding, the EIS also includes recommended mitigation measures to further reduce potential impacts, including new design guidelines, modifications to

the thresholds for the Design Review process, and new requirements for protecting views and preventing adverse shading effects.

While these measures are not currently required, the EIS explicitly states that without implementation of these or similar measures, significant adverse impacts may occur. As part of the SEPA process, this information is provided to City decision makers for their consideration in the design of the Final EIS Preferred Alternative.

The Final EIS includes a description of the Preferred Alternative and associated mitigation measures, including a detailed description of the proposed privacy standards.

Map Comments

18. MHA is not proposed to be implemented in areas zoned single family outside of urban villages.
19. Comment noted. See EIS Section 3.4.
20. See Preferred Alternative map in Appendix H. A lower scale MHA zoning designation is proposed.
21. This is a programmatic EIS that addresses area-wide land use and zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects that could be required are also unknown. Individual development projects will undergo separate and more detailed SEPA review during which specific impacts and mitigation could be identified.
22. See response to 14 above.
23. See response to 14 above.
24. Comment noted.
25. See Preferred Alternative map in Appendix H. A lower scale MHA zoning designation is proposed.
26. See Historic Resources Section.
27. Comment noted. Preferred Alternative includes the minimum zoning increases needed to implement MHA.
28. See Preferred Alternative map in Appendix H, which includes RSL zoning for the area.
29. See Preferred Alternative map in Appendix H. Community generated principles support a denser multifamily zone designation.
30. See Preferred Alternative map in Appendix H, which includes RSL zoning for the area.
31. See Preferred Alternative map in Appendix H. Proposed LR1 in Preferred Alternative would include the same height limit and similar building scale to existing and potential new structures to the west.

32. See Preferred Alternative map in Appendix H. LR1 zoning under the Preferred Alternative would have similar scale and the same height limit as existing single family zoning regulations.
33. Existing zoning and for the location is Lowrise 3, and is proposed for Lowrise 3 under the Preferred Alternative.
34. See Preferred Alternative map in Appendix H. Comment noted.
35. See Preferred Alternative map in Appendix H. Comment noted.
36. See Preferred Alternative map in Appendix H. See response to 27 above.

House, Erin (Seattle For Everyone)

1. **Expresses support for MHA implementation to positively impact affordability and housing choice.**

Thank you for your comment. Your comment is noted.

2. **The FEIS study MHA implementation to maximize additional capacity for affordable and market-rate homes to the greatest extent allowable.**

Comments noted. Please see description of the Preferred Alternative in Chapter 2. Under the Preferred Alternative MHA would be implemented throughout the study area using a displacement risk / access to opportunity lens, and with emphasis on locating more housing and jobs near frequent transit nodes.

3. **Continue to use the Growth and Equity Analysis framework as a lens when implementing MHA and use new data as it becomes available.**

Comments noted. Please note that the Preferred Alternative includes consideration of the displacement risk / access to opportunity typology when assigning relative capacity increases necessary to implement MHA in urban villages.

Hudson, Ron

1. **The comment document requests completion of an EIS pertaining to just the South Park neighborhood. The comment document notes that South Park has serious environmental issues, and expresses concern about notice and public engagement.**

Comments noted. Thank you for your comment. Please see frequent comment responses concerning individual urban village review and community engagement. Please see also Appendix B. Please see the Preferred Alternative map at Appendix H for South Park. In recognition of constraints in South Park, the minimum zoning changes necessary to implement MHA are proposed for the South Park area. This approach is consistent with the approach proposed for areas outside of urban villages under the action alternatives.

Hurd, Caroline

1. **Draft EIS sufficiently addresses impacts. Supports an approach that considers displacement risk.**

Thank you for your comments. Your comments are noted.

Jacobs, Lyn

2. **Maintain the existing urban village boundary in North Rainier.**

Thank you for your comment. Comment noted.

James, Jules

1. **Commenter supports the No Action Alternative. Grand Bargain was compromised when single family areas were removed from zone changes.**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as the Growth with Livability report. Please also see frequent comment response concerning *Single family zones not in the study area*.

2. **Concern about changes in City coordination with neighborhood advocacy groups**

Thank you for your comment. Your comment is noted, although it is not specific to the analysis and therefore a response is not provided.

3. **Concern that zone changes and added capacity shift ownership from local to institutional, with impacts on leasing to local business**

Thank you for your comment. Your comment is noted, although it is not specific to the analysis and therefore a response is not provided.

4. **Lowrise 2 zone changes do not account for likely change in building type that added height will cause**

Please see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study for details about the variety of building types expected with proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, many of which include family-size units such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas allows for more family-size and family-style housing in areas that are currently zoned single family.

Note also that the proposal includes family-size unit requirements for both market rate and affordable housing performance. Also note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial](#)

[Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

5. Concern about lack of parking requirements

Please see frequent comment response concerning *Impacts to parking*.

Janet

1. Commenter prefers Alternative 2 for Morgan Junction and West Seattle Junction citing infrastructure concerns

This is a programmatic DEIS addressing area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects required are also unknown. Individual development projects will undergo separate and more detailed SEPA review; including traffic impact analysis, and specific mitigation will be determined at that time.

Please see frequent comment response concerning *Individual urban village review*.

2. Concern for public transit and traffic

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

3. Concern about green space standard in Junctions, recommends Alternative 1

Please see EIS chapters 3.2 Land Use and 3.6 Biological Resources for discussion of impacts and mitigation measures, including updates to Incorporated Plan Elements.

Jarret, Justin

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Jasmine

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Jeffers, Chad

- 1. The area located north of Roosevelt High School to the reservoir, between 12th and 15th avenue is currently zoned as Single Family. In support of housing affordability, the residents of the neighborhood are in support of up-zoning to RSL only. LR1 and LR2 is unacceptable as it will change the neighborhood from affordable family homes to unaffordable studio and 1 bedroom homes**

Thank you for your comment. Comment noted.

Jenn

- 1. Concern that there will be too little affordable housing with zone changes; concern for displacement**

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

- 2. Concern about displacement and homeless crisis**

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

- 3. Concern about proposed development standards including green space; need more trees; there's enough room for growth with existing capacity**

Concerning setbacks, note that Residential Small Lot and multifamily zones (lowrise, midrise, and highrise) require both front and side setbacks. Please see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study for details of each zone.

Please see frequent comment response concerning *Impacts on tree canopy*. Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see frequent comment response concerning *Alternatives to MHA that could achieve objectives*.

4. Concern about lack of parking requirements, especially in areas without amenities and infrastructure

Please see frequent comment response concerning *Impacts to parking*.

5. Concern about flooding, parking, air quality

Please see EIS Chapter 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures. Please see frequent comment response concerning *Impacts to parking*. Please also see frequent comment response concerning *Impacts to Stormwater Infrastructure*.

6. Concern about air quality and loss of trees, lack of neighborhood review

Please see EIS Chapter 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures. Please see frequent comment response concerning *Impacts on tree canopy*.

JoHahnson, Mark

1. DEIS does not include rezoning surplus government lands for use in affordable housing

Please see frequent comment response concerning *Affordable housing on surplus public lands*.

2. Concern that payment option would preclude non-profit developers from utilizing MHA funds

Please see EIS Chapter 3.1 Housing and Socioeconomics as well as the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses payment dollars to fund new construction as well as acquisition and rehabilitation of existing housing, all of which serves low income households in neighborhoods across the city.

3. DEIS did not include zone changes outside of urban villages

Please see frequent comment response concerning *Single family zones not in the study area*. Note that the proposal includes zone changes for all multifamily and commercial areas, both inside and outside of urban villages.

4. DEIS did not include investing in transit in areas that have unbuilt capacity

The proposal is aimed at providing additional affordable housing so the City intends to pursue mitigation measures that will alleviate impacts while still achieving the goal of improved housing affordability. Nothing in this proposal impedes the ability of the City to pursue further investments in transit across the city. Please also see EIS Appendix C MHA Implementation Principles, which include "Ensure MHA program creates affordable housing opportunities throughout the city" and "Consider locating more housing near

neighborhood assets and infrastructure such as parks, schools, and transit.”

5. DEIS did not study impact fees

The proposal is aimed at providing additional affordable housing so the City intends to pursue mitigation measures that will alleviate impacts while still achieving the goal of improved housing affordability. Nothing in this proposal impedes the ability of the City to pursue implementation of an impact fee program.

6. DEIS did not study the merits and compatibility of Alternative 1 with the Comprehensive Plan

As discussed on DEIS p. 2.4, the MHA DEIS formally adopts the Comprehensive Plan EIS, of which the Preferred Alternative forms the basis for the MHA DEIS No Action Alternative.

7. Concern that growth estimates are too large

Please see EIS Appendix G Technical Memorandum: MHA EIS Growth Estimates.

8. DEIS did not study phased zone changes

Please frequent comment response concerning *Alternatives to MHA that could achieve objectives*.

9. Concern about extreme density of maximum buildout of Alternative 3

Potential impacts of the alternatives related to compatibility with existing land use patterns are described on DEIS pages 3.97 through 3.118. Consistency with policies and codes is specifically discussed on DEIS pages 3.108 (Alternative 2) and 3.118 (Alternative 3). Mitigation measures to address compatibility and other potential land use impacts are described on pages DEIS pages 3.120 through 3.121.

10. DEIS did not study existing capacity ability to meet growth goals

The proposal is aimed at providing additional affordable housing so the City intends to pursue mitigation measures that will alleviate impacts while still achieving the goal of improved housing affordability. The Seattle 2035 Comprehensive Plan is the growth strategy, and the EIS conducted for that plan identified a significant unavoidable adverse impact in the area of housing. Proposed MHA as evaluated in this EIS, is one action the city is studying to partially mitigate the housing affordability challenge. Please see DEIS p. 2.4.

11. No analysis was made of pipeline projects

Pipeline projects were considered for the purposes of estimating MHA affordable housing units, but are not debited from overall growth estimates. Please see EIS Appendix G Technical Memorandum: MHA EIS Growth Estimates.

12. Zone changes in a particular part of Wallingford are incompatible with Comprehensive Plan Land Use goals

Potential impacts of the alternatives related to compatibility with existing land use patterns are described on DEIS pages 3.97 through 3.118. Consistency with policies and codes is specifically discussed on DEIS pages 3.108 (Alternative 2) and 3.118 (Alternative 3). Mitigation measures to address compatibility and other potential land use impacts are described on pages DEIS pages 3.120 through 3.121.

13. Alternatives 2 and 3 should be analyzed using Seattle 2035 20-year growth strategy

Please see response to comment #11 above.

14. Payment option does not guarantee that affordable housing will be built in high opportunity areas or near transit

Please see response to comment #2 above.

Johnson, Iskra

1. Concern about loss of tree canopy.

Comment noted. Please see frequent comment response concerning tree canopy. Please also see response to Early, Tom.

2. Aesthetic and community concerns.

Comment noted. Please see discussion in section 3.3 Aesthetics.

3. Historical concerns.

Comment noted. Additional context for the Historic and Cultural Resources Affected Environment will be included is included in the FEIS. Please also see response to Woo, Eugenia.

4. Affordability.

The comment expresses concern that new housing will drive up the cost of other housing. Please see discussion of housing affordability levels in Section 3.1 Housing and Socioeconomics. Please also note that implementation of MHA would add a requirement for new development to make a contribution towards affordable housing.

5. Race and class.

Please see frequent comment response concerning location of MHA affordable housing.

6. Legal issues.

Comment noted. The EIS reviews the potential impacts of implementing MHA in the study area.

7. Traffic management.

The comment states that there are no convincing calculations of the increase in street traffic due to population increase. Comment noted. Please see Section 3.4 Transportation.

8. Assumptions of inevitability.

Comments noted. Please see Chapter 2 for discussion of growth estimates under each alternative.

Johnson, Jeff**1. EIS should address urban villages individually.**

Please see frequent comment response concerning Individual Urban Village Review.

2. The EIS does not adequately address the city as a whole.

Please see frequent comment response concerning Citywide Impacts to the City as a Whole.

Johnson, Lani

Note: This comment response was potentially inadvertently omitted from comment responses and letters published in the FEIS on November 9th. The comment response and comment letter was added to the published FEIS documents on November 14th.

1. The EIS is too long and difficult to review.

Comment noted.

2. Clarification of the No Action alternative.

Comments noted. See Chapter 2 for description of the alternatives including No Action. 20-year growth estimates and MHA affordable housing production estimates are provided for each alternative.

Regarding the maps, each map in appendix H includes a notation with the existing zone designation alongside the designation that is proposed in the action alternatives.

3. Confusion regarding different versions of the MHA draft zoning maps published.

As noted, in October of 2016, the City released a draft MHA zoning map to receive public comments and discuss with community members in public meetings. Alternatives studied in the EIS include variations of the MHA zone changes in order to evaluate environmental impacts. The Preferred Alternative in the FEIS reflects public comments received, DEIS comments, and information on environmental impacts.

4. Alternatives and objectives.

See frequent comment response regarding alternatives that could meet the objectives.

5. Combined review of urban village areas.

See frequent comment response regarding individual urban village review.

6. Concerns that some projects would not undergo project level SEPA review.

Comments noted. Thank you for your comments. Where impacts are evaluated in Section 3.0 of the EIS projects that would or would not be likely to undergo environmental review are described. See also updated information in the FEIS regarding design review thresholds in Section 3.3 Aesthetics.

7. Cumulative effects.

Comment noted. Please see frequent comment response concerning cumulative impacts.

8. Use of the term Ravenna.

Comments noted. The use of the term Ravenna in the EIS is to identify a portion of the University Community Urban Center that is formerly adopted as an urban center in the Seattle 2035 Comprehensive Plan.

9. Concerns about community engagement.

Please see frequent comment response concerning community engagement. Please also see Appendix B.

10. Concerns that EIS does not address livability.

Comments noted.

11. Concerns about outdated data and analysis methods in the housing and socioeconomics section.

Comments noted. The most recent available demographic data provided by the US Census and other sources is used for analysis. Direct, economic and cultural displacement are analyzed in the FEIS. The planning horizon for the analysis is 20 years. Growth projections consider that there will likely be development cycles within the planning horizon.

12. Concerns about consolidation of land ownership.

Comments noted. Development activity is expected to continue with or without MHA implementation during the planning horizon. Broader trends in real estate and regional economics are not expected to be altered due to proposed MHA implementation. See also frequent comment response regarding amount of the MHA affordable housing requirements, and comment response to Bertolet, Dan.

13. Viability of existing housing was not considered.

Growth estimates in the EIS assume only a subset of properties in the study area will redevelop during the planning horizon. Models assume that properties that are less viable for retention will be replaced but many existing housing and commercial structures would not be developed during the planning horizon. See also response to 12 above.

14. Speculation and nonproductive land vs. supply.

See discussion of market vacancy rate of housing in Section 3.1 Housing and Socioeconomics at FEIS Exhibit 3.1-21. Housing vacancy rates currently and in recent years have been at very low levels of 4% and less.

15. Hidden housing in single family zones.

Available demographic and housing information is included in Section 3.1 Housing and Socioeconomics. Much of the information, such as cost burden information at FEIS exhibits 3.1-19 and 3.1-20, reports data by household. Unrelated individuals jointly renting a home, such as a single family home, are reflected in data as a household. Cost burden levels are adjusted for size of the household. Section 3.1 also includes information from an analysis of rents for smaller rental structures, which may include homes formerly used as single family homes. The analysis finds that a higher percentage of smaller plexes are available to households earning 60% of AMI or below (around 13%), than for 20+ unit apartment structures (3%). However, at 13%, only a small percentage of the existing rental stock in smaller rental structures is available to low-income households with incomes at 60% AMI or below.

16. Housing for families and the elderly.

Please see frequent comment response concerning family-friendly housing.

17. Abrupt transitions and land use impacts.

Under the Preferred Alternative, area in the proposed urban village boundary expansion would primarily be zoned Residential Small Lot with an (M) tier MHA designation, while portions of three blocks would include multi-family zones with an (M1) tier MHA designation. Section 3.2 Land Use describes the degree of land use impact associated with different zoning changes. MHA implementation as a Lowrise zone with an (M1) designation in the area noted in the comment would have moderate to significant land use impacts as described. Changes to implement the Residential Small Lot zone in the area would generally result in a minor land use impact.

18. Topography and local factors should be considered in the estimation of walksheds.

Topography and the presence of street connectivity are considered as factors in establishing the estimated 10-minute walk boundaries for potential urban village expansion.

19. Design review thresholds.

Please see updated discussion of design review thresholds at Section 3.3 in the FEIS.

20. Aesthetic impact in urban village expansion area.

The statement referenced on DEIS page 1.361 is a general statement referring to aesthetic impacts that would occur in a larger geographic area under Alternative 2 for urban villages with high

displacement risk and lower access to opportunity. Roosevelt/Ravenna is an urban village with low displacement risk and high access to opportunity. The comment is correct that the extent of the aesthetic impacts in the Ravenna area would be greater under alternative 3 than Alternative 2. Please see the geography of the proposed urban village boundary expansion under the Preferred Alternative, which is reduced compared to Alternative 3.

21. Design review thresholds.

Comment noted, please see frequent comment response regarding individual urban village review. Please see also comment response to Bricklin, David, comment 6.

22. Parking and loading needs are understated.

Please see frequent comment response regarding parking impacts and mitigation. Universal access requirements would continue to apply with or without MHA implementation. Affordable housing development funded by the Office of Housing often are intended to serve specific populations, and include designs and features for served populations such as seniors and disabled persons.

23. Transportation and housing types.

Comments noted.

24. Parking needs near Roosevelt High School.

Comments noted. Please see frequent comment response concerning parking impacts and mitigation.

25. Insufficient historic resources surveys.

Comments noted. Please see frequent comment response regarding historic resources analysis. Please see additional discussion added in the FEIS in Section 3.5. Please see also response to Woo, Eugenia.

26. Mitigation measures for historic resources.

Comments noted.

27. Significant unavoidable impacts on historic resources.

Comments noted. The EIS identifies the potential for impacts, and provides mitigation measures that could be take to reduce the impacts. Please see additional discussion in subsection 3.5.4 in the FEIS, and please see expanded discussion of the mitigation measure in subsection 3.5.3 in the FEIS.

28. Ravenna neighborhood and historic resources.

Comments noted. Please see frequent comment response concerning historic resources.

29. Historic buildings contributing to housing supply.

Comments noted. Please see discussion added in the FEIS at page 3.306 concerning affordable spaces in historic structures.

30. Tree canopy and related effects.

Comments noted. Please see expanded discussion and updated information on tree canopy protections in FEIS Section 3.6.3.

31. Shading effects.

As noted, shading effects are addressed in Section 3.3 Aesthetics, including discussion of shading effects on vegetation at FEIS page 3.173.

32. Update park and open space analysis.

The parks and open space analysis is updated in the FEIS to incorporate the adopted 2017 Parks and Open Space Plan.

33. Provide open space where more housing is provided.

Comments noted. Please see mitigation measures in Section 3.7 Open Space and Recreation, and Section 3.6 Biological Resources.

34. Construction impacts.

Comments noted. Please see discussion of construction-related impacts in Section 3.2 Land Use.

35. Mitigation strategies must be realistic.

For each section of Chapter 3, the DEIS identifies mitigation measures. The DEIS identifies possible mitigation measures that will at least reduce the adverse environmental impacts of a proposal. Since this is a non-project action with a long timeframe some potential mitigation measures are discussed in general, and would need to be further defined as a part of future actions, but are nonetheless plausible steps that could be taken to mitigate impacts.

36. Varied suggestions for other mitigation measures.

Comments noted. Please see mitigation measure in each Section of Chapter 3 of the FEIS. In several sections mitigation measures are expanded or included in more detail.

37. Work with the Ravenna Bryant Community Association (RBCA).

Comments noted. Please see frequent comment response regarding public engagement, and Appendix B.

38. Skew intensity of development towards the western side of the Roosevelt Urban Village. Focus density near the Roosevelt light rail station.

Comments noted. Please see the Preferred Alternative for the Roosevelt urban village at Appendix H.

39. Consider future reuse of the Roosevelt reservoir site for parks and open space or a community center.

Comment noted.

39. Consider future reuse of the Roosevelt reservoir site.

Comment noted.

40. Retain 15th Ave. NE as the boundary of the Roosevelt urban village.

Comment noted.

41. Maintain single family residential areas near Ravenna Park due to the environmentally sensitive areas of the north and south slopes of the park.

Comment noted. Please see discussion of environmentally critical areas at Section 3.6.

42. Defer MHA implementation until after historic resources surveys are conducted. Consider RSL zoning in some areas of Roosevelt/Ravenna after historic resources surveys are complete.

Comment noted. Please see responses above regarding historic resources. Please see the Preferred Alternative for the Roosevelt / Ravenna area, which includes primarily RSL in the proposed urban village boundary expansion area to the east of 15th Ave. NE.

43. Suggestions to work with neighborhood the Ravenna / Bryant Community Association and other neighborhood stakeholders regarding zoning changes.

Comments noted. Please see Appendix B.

44. Performance option affordable housing in the Roosevelt / Ravenna neighborhood.

Comments noted. Please see frequent comment response regarding location of MHA affordable housing units.

Johnson, Lewis

1. Comments concerning lack of alternatives.

The commenter states that under Alternative 1 no action there is a pending proposal to increase allowable heights in the NC, LR and MR zones. This is incorrect. Under Alternative 1, MHA would not be implemented in the study area and neither zoning map changes nor zonewide changes to development standards mentioned in the comment would be altered. Each map at Appendix H includes a notation with the existing zone designation and the proposed zone designation. Please also note there is an interactive webmap online with the EIS that allows for zooming in to see existing zoning and the zoning that would be in place in each alternative.

2. No alternatives are considered besides MHA implementation. Urban Villages are discussed in isolation.

Comment noted. Please see frequent comment response concerning alternatives that could meet the objective. Please see description of the study area in Chapter 2.

While urban villages are the primary geographic unit used for analyzing the impacts of different distributions of growth under the action alternatives, impacts for areas outside of urban villages are

also considered. In certain elements of the environment, such as transportation, impacts are discussed for the system as a whole, including areas outside urban villages. In other elements, such as land use and aesthetics, discussion of the degree of impact of a change from one zoning designation to another is provided, which can be applied to locations throughout the study area.

Please note that the degree of zoning change to implement MHA for those areas outside of urban villages is the minimum necessary to implement MHA (application of MHA with an (M) tier capacity increase), with the exception of several individual parcels with unique circumstances. These (M) tier changes are incremental in nature, and in general result in the allowance of up to one more story of development capacity in areas already zoned for commercial or multi-family development. No changes to allowed land use categories are proposed, and no rezones of single family lands are proposed.

3. Concerns about effects of MHA implementation on economic development decisions.

Comments noted. Please see comment response to Bertolet, Dan for discussion. Please also see frequent comment response regarding MHA affordable housing requirement.

4. Comments concerning loss of resources including historic structures, mature trees and environmentally sensitive areas.

Comment noted. Please see frequent comment responses concerning historic resources and tree canopy. Please also see responses to Woo, Eugenia, and Early, Tom.

5. Comments concerning methodology for analysis of relationship between development and low-income households in Section 3.1

Comment noted. Please see frequent comment responses concerning impacts on racial and ethnic minority populations, which includes discussion of updates to data. Please see also response to Fox, John comments 3 and 4.

6. Land ownership.

Comment noted. Please see 3 above.

7. Demographic trends.

Comments noted. Please see Section 3.1 Housing and Socioeconomics. Please see frequent comment response concerning family-friendly housing.

8. Payment and performance options and location of housing in high opportunity areas.

Comments noted. Please frequent comment responses concerning location of MHA affordable housing. Please also see additional mitigation measures in the FEIS in Section 3.1 Housing and Socioeconomics related to investments in low opportunity areas.

9. Maintain the existing Roosevelt urban village boundary.

Comments noted. Please response to Warren, Barbara. Please see frequent comment response concerning single family areas outside of urban villages.

Johnson, Rob

1. Mitigating the interim condition.

Comments noted. Thank you for your comments. The preferred alternative includes zone designations and development standards that provide transitions at sensitive areas, such as the edges of urban centers and villages and in transitions from arterials and other corridors with more intensive land uses. These include as integrated parts of the proposal new standards for upper level setbacks, façade modulation standards, modifications to green factor requirements and new tree planting standards for the RSL zone. See discussion in Sections 3.2 Land Use, and 3.3 Aesthetics, and Section 3.6 Biological Resources. See also Appendix F.

2. Make the most of station areas.

Comments noted. Please see description of the Preferred Alternative in Chapter 2, and Preferred Alternative maps for station areas at Appendix H. Please note that the Preferred Alternative places emphasis on locating relatively more housing and jobs near frequent transit nodes.

3. Coordinating development around infrastructure livability and amenities.

Comments noted. Please see discussion of mitigation measures, including expanded mitigation measures in the FEIS, in Sections including 3.6 Open Space and Recreation, and 3.8 concerning schools. With respect to schools, please see additional analysis of school capacity conducted in coordination with Seattle Public Schools in the FEIS. Please see mitigation measures in Section 3.8 for identification of impact fees for schools as a potential mitigation measure.

4. Flexibility throughout the city.

Comments noted. Urban village expansions to a 10-minute walkshed that were studied in the Seattle 2035 Comprehensive Plan are analyzed in the EIS. Please see frequent comment response concerning single family areas outside of urban villages. Please also see comment response to Murdock, Vanessa. Please see discussion of the approach for the Preferred Alternative in Chapter 2. The Preferred Alternative includes significant increase in areas with zoning to encourage “missing middle housing”, including the RSL zone and the LR1 zone. Please also see frequent comment response regarding family-friendly housing.

5. Commercial affordability.

Comments noted. Please see expanded discussion of cultural displacement in the FEIS, including mitigation measures, in Section 3.1.

6. Using a race and social justice lens.

Comments noted. Please see frequent comment response concerning impacts on racial and cultural minority groups, which details responses to comments from Councilmember Lisa Herbold. Please see expanded discussion in Section 3.1 Housing and Socioeconomics that enhances the race and social justice lens used in the EIS.

Johnson, Trish

1. The comment document requests completion of an EIS pertaining to just the South Park neighborhood. The comment document notes that South Park has serious environmental issues, and expresses concern about notice and public engagement.

Comments noted. Thank you for your comment. Please see frequent comment responses concerning individual urban village review and community engagement. Please see also Appendix B. Please see the Preferred Alternative map at Appendix H for South Park. In recognition of constraints in South Park, the minimum zoning changes necessary to implement MHA are proposed for the South Park area. This approach is consistent with the approach proposed for areas outside of urban villages under the action alternatives.

Jones, Anita

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Jones, Scott

1. Raising the allowed height of the building across the alley from us to 50 feet would negatively affect our quality of life at home and the integrity of our neighborhood.

Thank you for your comment. Comment noted.

Jones, Michael-1

1. Commenter in favor of a 4th Alternative limiting growth

Please frequent comment response concerning *Alternatives to MHA that could achieve objectives*.

2. Commenter in favor of a 4th Alternative limiting growth

Please see response to comment #1 above.

3. Reducing vehicular demand not possible given limited space; Commenter in favor of a 4th Alternative limiting growth

Please see response to comment #1 above. Please also see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

Jones, Michael-2

1. Reducing vehicular demand not possible given limited space; adding affordable housing will make transportation issues worse

Please also see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

2. Concern about lack of space for growth while keeping Seattle livable

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as the Growth with Livability report.

Please also see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix C MHA Implementation Principles, which include “Ensure MHA program creates affordable housing opportunities throughout the city” and “Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.” Locating more housing near transit and amenity-rich areas helps meet goals for reducing car trips and increasing transit use, which support climate mitigation, equity, and livability goals.

JR

1. Limit growth, save Seattle's character.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see the Seattle 2035 Comprehensive Plan.

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures. Please also see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

2. Do not invite unlimited poor to our area who need endless subsidization or who feed off of government handouts.

Comment noted.

3. Concern about wildlife

Comment noted.

4. Concern about aesthetics

Comment noted.

5. Concern about public services and utilities

Comment noted.

Kaku, Katie

1. Concern about school capacity and mitigation measures

Please see frequent comment response concerning *Impacts to Seattle Public School capacity*

Kapsner, Jeff

1. Commenter prefers Action Alternatives, cites need for more housing

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

2. Bigger buildings in urban villages is appropriate

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS chapters 3.2 Land Use and 3.3 Aesthetics for discussion of impacts and mitigation measures.

3. Driverless cars

Thank you for your comment. Your comment is noted. Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as the Growth with Livability report.

Kato, Marcia-1

1. DEIS does not address specific neighborhoods sufficiently

Please see frequent comment response concerning *Individual urban village review*

2. Community engagement was insufficient

Please see frequent comment response concerning *Community engagement*. Please also see EIS Appendix B for a discussion of the MHA community input process and a summary of input received.

3. Proposed zone changes and current incentive do not yield many affordable housing units; concern about displacement

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses

concerning *Impacts on racial and cultural minority groups and Displacement analysis*.

Please see EIS Chapter 3.1 Housing and Socioeconomics as well as the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses payment dollars to fund acquisition and rehabilitation of existing housing.

4. Concern about family-size units

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle's single family zoned land.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, many of which include family-size unit types such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas allows for more family-size and family-style housing in areas that are currently zoned single family.

Note also that the proposal includes family-size unit requirements for both market rate and affordable housing performance. Also note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

5. Design Review not adequate

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as mitigation measures. Note that proposed changes to the Design Review Program as discussed by City Council in September 2017 include lowering thresholds for areas where zone changes occur through MHA.

6. West Seattle traffic analysis is inaccurate; analysis not specific to West Seattle

Please see comment response to Christian, Brent. Please also see frequent comment response concerning *Individual urban village review*.

7. West Seattle Junction historic resources not addressed; concern for livability and compatibility

Exhibit 3.5.3 of the Draft EIS includes the West Seattle Junction Historical Survey Group's survey of the West Seattle Junction. As a Programmatic EIS, project-level issues regarding specific resources are not evaluated.

Potential impacts of the alternatives related to compatibility with existing land use patterns are described on DEIS pages 3.97 through

3.118. Consistency with policies and codes is specifically discussed on DEIS pages 3.108 (Alternative 2) and 3.118 (Alternative 3). Mitigation measures to address compatibility and other potential land use impacts are described on pages DEIS pages 3.120 through 3.121.

Please also see the Growth with Livability report.

8. Analysis does not consider increasing impervious surfaces

Please see frequent comment response concerning *Impacts to Stormwater Infrastructure*.

9. Concern about tree growth

Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

10. Concern about increasing demand for parks and open space and accessibility

The EIS describes the indirect impacts to parks and open space that would occur from growth under all three alternatives. See Section 3.7.2. Mitigation measures are identified in Section 3.7.3 that could plausibly mitigate the identified impacts over the 20-year planning horizon. In the FEIS additional specificity about parks and open space mitigation measures is provided. See also Holliday, Guy response 14 concerning open space.

11. Concern for Seattle Public School capacity specific to West Seattle

Please see frequent comment response concerning *Impacts to Seattle Public School capacity*. Please also see frequent comment response concerning *Individual urban village review*.

12. Concern for stormwater infrastructure in West Seattle

Please see frequent comment response concerning *Impacts to Stormwater Infrastructure*. Please also see frequent comment response concerning *Individual urban village review*.

13. Concern about air quality and tree loss to mitigate health risks

Please see frequent comment responses concerning *Impacts to tree canopy* and EIS Chapter 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures.

Kato, Marcia-2

1. New development does not sufficiently address affordability needs for low-income and middle-income households.

Comments noted. Please see discussion of impacts in Section 3.1 Housing and Socioeconomics including discussion of direct, economic and cultural displacement impacts. Please note that in West Seattle there is currently not a requirement for affordable housing in new development. MHA implementation under any of the

action alternatives would include a requirement for development to contribute to affordable housing.

2. The biggest flaw of the DEIS is inadequate community input.

Comment noted. Please see frequent comment response concerning community engagement. Please see also Appendix B summary of community input.

Katy

1. Question about definitions on maps

For definitions of zoning designations and development standards that accompany each zone, please refer to EIS chapters 3.2 Land Use and 3.3 Aesthetics for discussion of zone types, development standards, and mitigation measures. Please also see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

Katz, Andrew

1. Supports comments of the Capitol Hill Renters Initiative.

Thank you for your comment. Comment noted. Please see response to Brennan, Alex.

2. Make more and larger urban village boundary expansions, to maximize opportunities for greater density of housing.

Comments noted. Please see discussion of the Preferred Alternative at Chapter 2. Under the Preferred Alternative urban villages expansions to a full 10-minute walkshed would be included for all expansion areas considered as a part of the Seattle 2035 Comprehensive Plan process.

3. Suggests increasing zoning at Melrose Promenade to NC3P-145 instead of NC3P-95.

Comment noted.

Katz, Mitch

1. Concern about affordability of new development

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. It is unlikely that a project already permitted is voluntarily contributing to affordable housing development through MHA, however many developments include MFTE housing which serves low-income community members. Note that MHA is a proposal that would require affordable housing with all new multifamily and commercial development where no requirement exists today.

Please also see frequent comment response concerning *MHA affordable housing requirements* and *Location of MHA housing units*.

2. Concern about loss of trees and open space along streets

Please see EIS chapters 3.6 Biological Resources and 3.7 Open Space and Recreation for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

3. Concern about loss of trees, light, character

Please see EIS chapters 3.2 Land Use and 3.3 Aesthetics for discussion of impacts and mitigation measures. Please also see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study. Please also see frequent comment response concerning *Impacts on tree canopy*.

4. Concern about transit capacity, safety, and traffic

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures. This is a programmatic DEIS addressing area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects required are also unknown. Individual development projects will undergo separate and more detailed SEPA review; including traffic impact analysis, and specific mitigation will be determined at that time.

5. Concern about sewer capacity and frequency of repairs, electricity demand, and police capacity

Please see EIS Chapter 3.8 Public Services and Utilities for discussion of impacts and mitigation measures. Since the DEIS, Seattle City Light provided additional information about potential impacts, and additional discussion is included in the FEIS section 3.8.

Please also see frequent comment response concerning *Impacts to sanitary sewer systems*.

Kaylor, Courtney-1

1. Supports an NC-55 zone designation for MHA implementation at the site of 70th and Greenwood.

Comment noted. Please see the Preferred Alternative map for the Greenwood Urban Village at Appendix H. Under the Preferred Alternative the site is identified for an NC2-55 zone designation.

Kaylor, Courtney-2

1. Supports an NC-75 zone designation for MHA implementation at the site of 1600-1612 Dexter Ave. N., the site of a pending contract rezone action.

Thank you for your comments. Comment noted. It is our understanding that the contract rezone to an allowed height of 65 feet, and including MHA requirements as a condition of the Property Use and Development Agreement (PUDA) was recommended for

approval by the City's Hearing Examiner in October of 2017. As a location outside of the urban village boundary a standard MHA capacity increase from the existing 40' zone to the NC-55' zone is included in the Preferred Alternative. However, it is expected that the proposed legislation for MHA implementation will not include sites like the one in question that is subject to a recently-approved contract rezone with MHA as a condition. As a result, the development proposal and conditions as agreed to in the contract rezone process can remain in place.

Keller, Eve

1. Do not expand the urban village boundary in North Rainier.

Thank you for your comments. Comment noted.

Keller, Kathryn

1. EIS does adequately evaluate impacts to portions of the study area that are outside of urban villages.

Thank you for your comments. Comment noted. While urban villages are the primary geographic unit used for analyzing the impacts of different distributions of growth under the action alternatives, impacts for areas outside of urban villages are also considered. In certain elements of the environment, such as transportation, impacts are discussed for the system as a whole, including areas outside urban villages. In other elements, such as land use and aesthetics, discussion of the degree of impact of a change from one zoning designation to another is provided, which can be applied to locations throughout the study area.

Please note that the degree of zoning change to implement MHA for those areas outside of urban villages is the minimum necessary to implement MHA (application of the MHA with an (M) tier capacity increase), with the exception of several individual parcels with unique circumstances. These (M) tier changes are incremental in nature, and in general result in the allowance of up to one more story of development capacity in areas already zoned for commercial or multi-family development. No changes to allowed land use categories are proposed, and no rezones of single family lands are proposed.

Kelly, Kathleen

1. The comment document requests completion of an EIS pertaining to just the South Park neighborhood. The comment document notes that South Park has serious environmental issues, and expresses concern about notice and public engagement.

Comments noted. Thank you for your comment. Please see frequent comment responses concerning individual urban village review and community engagement. Please see also Appendix B. Please see the Preferred Alternative map at Appendix H for South Park. In

recognition of constraints in South Park, the minimum zoning changes necessary to implement MHA are proposed for the South Park area. This approach is consistent with the approach proposed for areas outside of urban villages under the action alternatives.

Kemna, Mariska

1. Concern about bulk and light; interest in common green space for large buildings

The EIS describes mitigation measures that are included in the proposal to offset potential impacts of new development, specifically building setbacks, façade treatments, and building envelope modulation to reduce visual bulk. The EIS also includes recommended mitigation measures to further reduce potential impacts, including new design guidelines, modifications to the thresholds for the Design Review process, and new requirements for protecting views and preventing adverse shading effects.

While these measures are not currently required, the EIS explicitly states that without implementation of these or similar measures, significant adverse impacts may occur. As part of the SEPA process, this information is provided to City decision makers for their consideration in the design of the Final EIS Preferred Alternative. The Final EIS includes a description of the Preferred Alternative and associated mitigation measures, including a more detailed description of the proposed privacy standards.

Note that all multifamily development includes requirements for landscaping and amenity areas, and some types of projects require publicly accessible open space.

2. Concern about transportation infrastructure and traffic

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

3. Concern about historic neighborhoods and scale of new development

See section 3.5.2 Impacts Common to All Alternatives, for discussion of potential impacts to historic resources from demolition and redevelopment. The EIS addresses varied potential impacts to cultural resources in different urban villages in the analysis of National Register of Historic Places sites within urban villages, review of which urban villages have historic resources surveys. See also discussion of urban villages in Impacts of the Alternatives.

Potential impacts of the alternatives related to compatibility with existing land use patterns are described on DEIS pages 3.97 through 3.118. Consistency with policies and codes is specifically discussed on DEIS pages 3.108 (Alternative 2) and 3.118 (Alternative 3). Mitigation measures to address compatibility and other potential land use impacts are described on pages DEIS pages 3.120 through 3.121.

4. Recommends limiting urban village boundaries to arterials

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see discussion of urban village boundary expansion areas identified in the Seattle 2035 Comprehensive Planning process.

5. Concern about community input process and uniqueness of urban villages

Please see frequent comment response concerning *Community engagement*. Please also see EIS Appendix B for a discussion of the MHA community input process and a summary of input received.

Please also see frequent comment response concerning *Individual urban village review*

6. Concern about green space between buildings

Note that all multifamily development includes requirements for landscaping and amenity areas, and some types of projects require publicly accessible open space. Residential development requires setbacks and landscaping standards, and most development requires Seattle Green Factor, which incentivizes landscaping visible to the public.

The EIS describes mitigation measures that are included in the proposal to offset potential impacts of new development, specifically building setbacks, including front and side setbacks. Please see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

The EIS explicitly states that without implementation of mitigation measures or similar measures, significant adverse impacts may occur. As part of the SEPA process, this information is provided to City decision makers for their consideration in the design of the Final EIS Preferred Alternative. The Final EIS includes a description of the Preferred Alternative and associated mitigation measures.

Kendahl

1. Concern about displacement, particularly in Crown Hill

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

Please also see frequent comment response concerning *Individual urban village review*.

2. Concern for low-income renters, need security

Please see response to comment above as well as mitigation measures included in Chapter 3.1. Also note that nothing in this proposal impedes the ability of the City to pursue implementation of HALA recommendations or other anti-displacement measures.

3. Concern about lower-middle class renters and homeowners

Please see answers to comments #1 and 2 above.

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle's single family zoned land.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, many of which include family-size units such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas allows for more family-size and family-style housing and ownership options in areas that are currently zoned single family.

The proposal is aimed at providing additional affordable housing so the City intends to pursue mitigation measures that will alleviate impacts while still achieving the goal of improved housing affordability.

4. Agreement with transitions principles

Comment noted.

5. Concern about infrastructure, including drainage, sidewalks, and pedestrian safety

Please see Chapter 3.4 Transportation for discussion of impacts and mitigation measures. Also see frequent comment response concerning *Impacts to Stormwater Infrastructure*.

6. Not in favor of Alternative 3, concern about public transit

Please see comment responses above.

Kendall, Katie-1

1. Requests rezone of the site at 4801 24th Ave. NE from LR3 to NC2-75.

Thank you for your comment. Comment noted. As noted in the letter, the site is near to but outside of the University District Urban Center. The comment notes that the owner of the site intends to submit a contract rezone application for the site for an NC2-85 designation.

Please see the Preferred Alternative evaluated in the FEIS, which does not include urban village boundary expansions other than those studied in the Seattle 2035 Comprehensive Plan. Where studied in the Comprehensive Plan, the preferred Alternative supports the

expansion of urban villages to a full 10-minute walk from frequent transit nodes.

Although the site in question is not included in the study area, descriptions of land use impacts in Section 3.2 Land Use would be applicable to the requested rezone, and there are instances of similar zone changes proposed within the action alternatives. At the location, the presence of a topographical change, and the presence of a utility easement, between the site and existing commercially zoned properties would likely reduce potential land use and aesthetic impacts of the requested zoning change. Material included in the comment letter could be considered as part of a contract rezone evaluation, or could be considered by City Council during review of proposed MHA implementation legislation.

Kendall, Katie-2

1. **Concerns about lack of consideration for additional density for the Industrial Commercial (IC) zones in significant transit corridors – particularly the Elliott Avenue corridor.**

Thank you for your comment. Comment noted. As noted, MHA implementation alternatives would increase FAR from 2.5 to 2.75 within IC zones. The DEIS considered a height increase for existing IC-45 zones to 55 feet of allowed height. In consideration of the scenario described in the comment and other factors the FEIS includes description in Appendix F and elsewhere that would adjust MHA implementation for IC-45 zones, to allow conversion to an IC-65 height limit.

The Preferred Alternative emphasizes location of additional jobs and housing near transit nodes. As a part of future planning processes, such as Sound Transit 3 planning, or review of industrial lands, additional adjustment of IC zones to allow for a greater increment of FAR could be evaluated.

Kendall, Katie-3

1. **Concerns about lack of consideration of expanding the boundary of the University District (Ravenna) Urban Center to include properties across from Union Bay Place NE.**

Thank you for your comment. Comment noted. As noted in the letter, the site is adjacent to but outside of the University District Urban Center. Please see the Preferred Alternative evaluated in the FEIS, which does not include urban village boundary expansions other than those studied in the Seattle 2035 Comprehensive Plan. Where studied in the Comprehensive Plan, the preferred Alternative supports the expansion of urban villages to a full 10-minute walk from frequent transit nodes. The Preferred Alternative applies MHA to the sites in question with the C2-55 zoning designation with an (M) tier capacity increase consistent with other lands in the study area but outside of urban villages.

The comment requests the NC2-75 zoning designation. Descriptions of land use impacts in Section 3.2 Land Use, and depictions of

aesthetic impact in Section 3.3, would be applicable to the requested rezone, and there are numerous instances of similar zone changes studied within the action alternatives. At the location, the presence of a topographical change to the west and north of the site, and adjacent commercially zoned properties with a proposed 75 foot height limit under the Preferred Alternative would likely reduce potential land use and aesthetic impacts of the requested zoning change. Other impacts of the proposed change, such as to transportation and public services and utilities would be expected to be minor, and would not be likely to create impacts that exceed those already described in the EIS.

Material included in the comment letter could be considered by City Council during review of proposed MHA implementation legislation.

Kendall, Katie-4

1. **Concerns about lack of consideration of the pending contract rezone applications in EIS alternatives include for 6414 15th Ave. NW.**

Thank you for your comment. Comment noted. The Preferred Alternative applies MHA to the sites in question with an NC-55 zoning designation with an (M) tier capacity increase. The comment letter notes that a contract rezone to an NC-65 zone designation is being pursued. The site is within the Ballard Urban Village.

Descriptions of land use impacts in Section 3.2 Land Use, and depictions of aesthetic impact in Section 3.3, would be applicable to the requested rezone, and there are numerous instances of similar zone changes studied within the action alternatives. At the location, the proximity of the site near to Ballard High School, and rapid ride transit service in the 15th Ave. NW corridor, are factors that would support MHA implementation at the site with a 65 foot or 75 foot height limit. See MHA implementation principles at Appendix C.

Other impacts of the proposed change, such as to transportation and public services and utilities would be expected to be minor, and would not be likely to create impacts that exceed those already described in the EIS.

Material included in the comment letter could be considered by City Council during review of proposed MHA implementation legislation.

It is expected that the proposed legislation for MHA implementation will not include sites that are subject to a recently-approved contract rezone with MHA as a condition. As a result, the development proposal and conditions as agreed to in the contract rezone process could remain in place, if a pending contract rezone application for the site is approved before MHA implementation legislation is adopted.

Kenison, Rebecca-1

1. **Comments about the online community dialogue about MHA implementation principles. Survey questions were poorly worded.**

Comments noted. Please see summary of community input at Appendix B which includes summaries of community input provided on the MHA implementation principles.

2. **Comments concerning the amount of the MHA affordable housing requirement.**

Comments noted. Please see frequent comment response concerning amount of MHA affordable housing requirement.

3. **How does the proposal dovetail with growth management plans?**

Comments noted. The Seattle 2035 Comprehensive Plan is the city's growth management plan adopted in accordance with the Washington State Growth Management Act. The EIS evaluates potential impacts relative to the adopted Seattle 2035 Plan, and the proposed action implements aspects of the Seattle 2035 plan. See discussion in Section 3.9 Air Quality and Greenhouse Gas Emission for discussion of greenhouse gas emission under the alternatives, which is related to sprawl.

Kenison, Rebecca-2

1. **Concern about back yards**

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures, as well as Chapter 3.3 Aesthetics for discussion of setback requirements. Also see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study. Note that multifamily zones carry requirements for amenity space and landscaping.

Kenison, Rebecca-3

1. **Uniqueness and character of individual neighborhoods needs to be maintained.**

Comments noted. Please see frequent comment response concerning individual urban village review.

2. **Existing zoning will meet and exceed density goals.**

Comments noted. Please see response to Holliday, Guy concerning growth estimates for the Madison-Miller urban village. Please note that objectives of the proposed action include leveraging development to produce at least 6,200 net new rent- and income-restricted housing units, and increase overall production of housing to help meet current and projected high demand.

3. **Prefer alternative one no action, with the modification that developer impact fees be collected throughout the city and that the amount of contributions to affordable housing be increased.**

Comments noted. Please see discussion in frequent comment response concerning the amount of MHA affordable housing requirements, and alternatives to the proposed action that could meet the objective.

4. **Action alternatives would result in high displacement.**

Comments noted. Please see discussion of displacement in Section 3.1 Housing and Socioeconomics. Please see discussion of direct, economic and cultural displacement. The analysis includes an estimate of directly displaced low-income households and demolished housing units under each alternative.

5. **Tall buildings do not allow children to have backyards, and we don't have adequate parks and open space.**

Comments noted. Please see discussion in Section 3.7 Open Space and Recreation including mitigation strategies for decrease in availability of open space under each alternative.

6. **Where will parking be? It is unrealistic that new residents will use transit.**

Comments noted. Please see discussion of impacts to parking in Section 3.4 Transportation.

Kenison, Rebecca-5

1. **Supports comments and conclusions of the Madison Miller Park Community Group.**

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Kennell, Marilyn-1

1. **Concern about community engagement process.**

Comments noted. Please see frequent comment response concerning community engagement and please see Appendix B summary of community input.

2. **Concern about impacts to parking, traffic, green space and public safety associated with proposed MHA implementation at 4022 32nd Ave SW in the West Seattle Junction urban village.**

The comment notes that draft maps and one of the DEIS alternatives considers a zoning designation of Lowrise 3 for the area in question. Please see the Preferred Alternative map for the West Seattle Junction Urban Village at Appendix H in the FEIS. MHA implementation with a Lowrise 1(LR1) zoning designation is evaluated in the Preferred Alternative. Height limit in the LR1 zone is

the same as the Single Family zone, and other development standards including a density limit and family sized housing requirement would apply to new development in the LR1 zone (see Appendix F). For discussion of impacts to traffic, green space and public safety see discussion in EIS Sections 3.4, 3.7, and 3.8.

Ketcherside, Rob

1. **Concern about impact of MHA implementation on the Pike/Pine Conservation Overlay District.**

Comments noted. Under action alternatives MHA would be implemented in the PPCOD. Development standards would be tailored to ensure continued incentive for builders to preserve character structures, consistent with the intent of the existing PPCOD. City staff held discussions during the development of MHA with Pike Pine area stakeholders familiar with the PPCOD. A development standard proposal that strengthens the effect of the PPCOD is proposed as an integrated component of MHA implementation. (See Appendix F).

2. **Concern that the proposal would reduce review by the historic preservation officer for landmark structures.**

Thank you for your comment. There is no change proposed to existing review procedures for landmark structures.

3. **Support for continuation of historic inventories as mitigation of potential impact to historic resources.**

Thank you for your comment. Comment noted.

4. **Support and encourage new historic districts.**

Thank you for your comment. Comment noted. Please see additional mitigation measures added in the FEIS in Section 3.5.

5. **Broadly reviewing for landmark status before approving demolition is useful mitigation for potential impact to historic resources.**

Thank you for your comment. Comment noted. Please see additional mitigation measures added in the FEIS in Section 3.5.

6. **Include discussion of PPCOD mitigation measures that are in Appendix F in Section 3.5.3.**

Comment noted. Attempts are made in the EIS to include as much information as possible within the Sections, however it may not be possible to include all detailed standards in the body of the document due to the unusual length and complexity of the subject matter.

King, Gretchen

1. **Extend the DEIS comment period.**

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June

29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

King, Stephanie

1. Use land at Fort Lawton for a public school.

Comment noted. Fort Lawton is outside of the study area. Please note that reuse of land at Fort Lawton is being evaluated through a separate EIS process.

Kirsh, Andrew

1. Assumption about tree canopy coverage in zones that stay the same zoning designation is flawed.

Changes in tree canopy coverage over time include tree losses due to development as well as tree maturation and planting. Measures described in subsection 3.6.3 mitigation measures are already being considered by the city with the intent of increasing tree canopy coverage to meet the 30% citywide goal. Since 2016 LiDAR data are not directly comparable with past tree canopy coverage surveys it is not possible to ascertain an overall trend in tree canopy gain or loss under existing conditions. It is possible that city policies will have the intended effect of increasing tree canopy over time. The assumption that developers will develop sites to full potential is reflected in the assumption in the action alternatives that rezoned areas will transition fully to a tree canopy coverage condition of the new zone over the study time horizon.

2. Trees are being lost in redevelopment in single family zones.

Please note that all single family zones except for single family zones inside of urban villages are not proposed for MHA implementation and are not included in the study area. Single family zones that are proposed under action alternatives for conversion to other zones are evaluated for tree canopy coverage losses in Section 3.6.

3. Concern about the estimate of canopy coverage for the RSL zone.

Comment noted. You are correct that the intent of the statement is that tree canopy coverage is assumed to translate inversely proportionally to lot coverage, regarding the assumption of RSL canopy coverage in the RSL zone relative to the single family and lowrise zones. Canopy coverage in lowrise zones is measured based on the 2016 LiDAR data.

4. Canopy coverage of future LR development is likely overestimated.

Comments noted. Changes in tree canopy coverage over time include tree losses due to development as well as tree maturation and planting, including tree maturation and planting in public right of ways adjacent to development sites. The estimate of canopy coverage is based on the most recent LiDAR canopy coverage data.

The analysis does include street trees and all other trees in the zone. Analysis provided in the comment suggests that existing single family home structures in the LR and MR zones boosts canopy coverage estimates. Canopy coverage estimates in the EIS include all development types and conditions within the zone in the canopy coverage assessment. Some single family structures, and other structures will remain in the study area with or without MHA implementation. It should also be noted that regardless of the type of structure vegetation maturation that takes place in years since development is always likely to be greater in tree canopy coverage than newly developed sites. It is possible as the comment suggests that tree loss impacts could be more noticeable in locations where greater amounts of development are concentrated in a short period of time.

5. Reduced setbacks in the RSL zone will further eliminate trees.

Comments noted. The RSL zone will have setback reductions and greater allowed lot coverage than the Single Family zone. As a mitigation measure and integrated feature of the plan a new tree planting requirement that prioritizes planting of large tree species is included as a part of the action alternatives. See additional discussion of mitigation measure in Section 3.6 in the FEIS.

6. Loss of trees has negative impacts on air quality and the urban heat island effect.

Comments noted. Section 3.6.1 includes a discussion of the benefits provided by the urban forest including the reduction of air pollution. In the FEIS acknowledgment of reducing the heat island effect is added.

7. Concern about enforcement of ECA protections.

Comments noted. No change to existing ECA regulations is proposed. See additional discussion of mitigation measures in Section 3.6.

8. Concern about land use impacts particularly in Capitol Hill.

Comments noted. The degree of land use impact is described in Section 3.2 as summarized in the comment.

9. Canopy loss and heat island effect should be added to the description of land use impacts where intensification of land use is described.

Comments noted. Language is added in the FEIS.

10. Land Use impacts should be described relative to existing uses, not existing zoning designations.

Comments noted. The reason that land use impacts are described related to zoning changes is because redevelopment of some sites would occur under the no action alternative under existing zoning. The degree of change stems from the incremental amount of redevelopment that could occur in the action alternatives compared to the development that would otherwise occur under no action.

11. Where is the comparative analysis of alternatives' impact on urban centers such as First Hill / Capitol Hill.

Impacts to each urban village including First Hill / Capitol Hill are discussed in Sections 3.1 – 3.9.

12. The EIS should discuss potential increases in property taxes.

Comment noted. Please see additional discussion in the FEIS section 3.1.2 impacts, of impacts of property tax increases on homeowners.

13. Newly planted trees are not adequate mitigation for loss of large trees.

Comment noted. Please see additional discussion in the FEIS mitigation measures related to tree planting and protection. Please also see response to Early, Tom.

14. Impacts of tree loss should be considered in the aesthetics section.

Comment noted. Impacts of potential tree loss are primarily evaluated in Section 3.6 biological resources. The value of tree canopy, including aesthetic value is discussed. Additional language is added in the FEIS in the aesthetics section regarding vegetation and trees.

Kirschner, Bryan

1. Supportive of analysis process

Thank you for your comment. Your comment is noted.

2. Alternative 1 conflicts with City's commitment and obligation to equity and to Affirmatively Further Fair Housing.

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include "9. Evaluate MHA implementation using a social and racial equity/justice lens."

3. The No Action Alternative would result in disparate racial impacts inconsistent with equitable development and AFFH

Please see response to comment #2 above.

4. Racial wealth disparities and recent history of racially restricted lending and land use covenants argue for reconciliation by seeking to create the most opportunities for affordable housing in high opportunity areas.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Low risk high

opportunity areas have the greatest share of M1 and M2 tier zone changes. Please also see EIS Appendix H Zoning Maps.

5. Maximize affordable housing unit production

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

Please see EIS Chapter 3.1 Housing and Socioeconomics as well as the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses payment dollars to fund acquisition and rehabilitation of existing housing.

6. Maximize affordable housing away from pollution sources that include arterials and highways

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods, which includes discussion of the relationship between how land is zoned in the city and where ethnic minority populations live.

7. Increase expansion of walksheds in high opportunity low displacement risk areas

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see discussion of urban village boundary expansion areas identified in the Seattle 2035 Comprehensive Planning process.

8. Reduce or eliminate parking minimums

Please see frequent comment response concerning *Impacts to parking*. Note also that parking is not required for development within urban villages and urban centers.

9. In high access to opportunity areas, expedite permitting, possibly by exempting projects from design review

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as mitigation measures. Note that proposed changes to the Design Review Program as discussed by City Council in September 2017 include changing thresholds and requiring only administrative Design Review and meeting caps for MHA performance projects.

10. Change all single family to RSL with rights for subdivision and promote minority homeownership

Please see frequent comment response concerning *Single family zones not in the study area*.

Kischner, Gerrit

1. The EIS must account for short and long term impacts on capacity at Seattle Public Schools.

Thank you for taking the time to comment. Comments noted. Please see frequent comment response concerning public school capacity. Additional analysis and coordination with SPS staff has been added in the FEIS. Please also see additional discussion of mitigation measure for school capacity constraints in the FEIS. Please see also response to Pollet, Gerry.

Kissman, Ellen (Yesler Community Collaborative)

1. Encourage the City to apply an equity lens in the implementation of MHA citywide.

Thank you for your comment. See frequent comment response *Impacts on racial and cultural minority groups*. This response includes information on how the FEIS incorporates additional analysis in Chapter 3.1 Housing and Socioeconomics to address your comment. Please also see response to Pasciuto, Giulia.

2. Support additional measures to solve affordable housing crisis

Thank you for your comment. Please see Section 3.1.3 where the FEIS includes supplemental description of mitigation measures related to cultural displacement impacts. Please also see ongoing HALA efforts, with recommendations for addressing housing affordability in Seattle.

3. FEIS should assess local conditions and carefully consider input from neighborhood-based groups

Please see EIS Appendix C MHA Implementation Principles, which include “7. Unique Conditions: a. Consider location-specific factors such as documented view corridors from a public space or right-of-way when zoning changes are made.” and “8. Neighborhood Urban Design: a. Consider local urban design priorities when zoning changes are made.” Please also see EIS Appendix B for a discussion of the MHA community input process and a summary of input received, as well as proposed zone changes guided by community input.

Please see frequent comment response concerning *Community engagement* and *Individual urban village review*.

4. FEIS should assess local conditions and carefully consider input from neighborhood-based groups

Please see response to comment #3 above.

Klatte, Phillip-1,2,3

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Klatte, Phillip-4

1. The review period was too short.

The SEPA Rules establish the review and comment period for a Draft EIS, as follows: a mandatory 30-day review period, plus an optional maximum 15-day extension if requested (WAC 197-11-502 (5), 197-11-455(7)). The City provided the maximum period authorized by State law.

2. Access to opportunity analysis is fatally flawed.

It is acknowledged that the typology and rankings of risk and opportunity areas identified in the City's updated Growth & Equity Analysis guided the evaluation of potential displacement impacts in the MHA Draft EIS, and for some sections of the 2035 Comprehensive Plan EIS. This study was prepared independent of the MHA EIS and is considered to be the best information currently available on the topic. It is appropriate for the City to rely on its typology and methodology. In addition, the level of detail of the evaluation of this issue in the Draft and Final EISs is far beyond what is required and typically provided in a programmatic EIS; refer to WAC 197-11-442. Your statements of disagreement with some of the study's characterizations are acknowledged.

3. Factors going into the access to opportunity index were not clearly weighted.

The comment is acknowledged.

4. The measure of component factors in the access to opportunity index were not gathered properly.

The comment is acknowledged.

5. No alternatives were studied.

Please refer to the response to the frequent comment response concerning alternatives considered that could meet the objective. The EIS includes a reasonable number of alternatives and they result in varying environmental consequences. As described in Chapter 2 of the Final EIS, there are several important distinctions between Alternatives 2 and 3. For example, the Growth & Equity typology and sensitivity to displacement is explicitly considered as a factor in distributing additional growth in Alternative 3 but not in Alternative 2. Please note that the Final EIS also identifies a new alternative (the Preferred Alternative), which modifies elements of the MHA program to address impacts identified in the Draft EIS and concerns expressed in comments.

6. The effects of upzoning are speculative.

The MHA program is structured as an incentive program in which the grant of additional development capacity (i.e., upzoning) is the incentive for providing affordable housing. This approach is based on provisions of Washington State law which place tight limits on how affordable housing programs may be implemented (RCW 36.70A.540). The City believes that upzoning is the most effective incentive permitted by the applicable statute.

It is acknowledged that rezoning does not directly, immediately or always result in a change in development; numerous other factors are involved in a property owner's decision to sell or redevelop. That said, upzoning is still believed to be an effective incentive and a reasonable basis for the MHA program. But MHA is not the only option in the City's affordable housing toolbox. ADU's, which are mentioned in the comment, are a valuable element of an overall program. The Draft EIS acknowledges, in section 3.1.4, that MHA by itself will not solve the city's affordable housing problem. An ADU based program, however, is not likely to accomplish MHA's objective of generating 6,200 affordable units, and would not, therefore, be a reasonable alternative to MHA.

7. There are other options that would achieve the objectives.

The comment is acknowledged. Please also see the previous response.

8. There is evidence there are incentives to avoid having other options explored.

The comment is acknowledged.

9. Failure to identify displacement and cultural loss of non-marginalized groups.

It is acknowledged that the displacement analysis is by intention more sensitive to potential impacts to lower income residents and minority and immigrant populations. The MHA program is intended to produce affordable housing, and it is logical and reasonable for the EIS to reflect this purpose and context and selected populations. The Draft EIS does, however, identify the totality of potential displacement irrespective of economic, social or racial categories affected; please refer to Exhibit 3.1-38 and Appendix G. Please also see additional discussion of cultural displacement in the FEIS.

10. Impacts not separated by urban village.

The Draft EIS identifies impacts by urban village where sufficient information is available. Please note that the SEPA Rules do not require site-specific analyses for programmatic EIS because legislative programs of broad scope, such as MHA, cover large geographic areas and detailed information is typically not available (WAC 197-11-442). Please also see frequent comment response concerning individual urban village review.

11. Impacts not delineated between Alternative 2 and 3.

The comment is acknowledged. Differences between Alternatives 2 and 3 are identified throughout the EIS.

12. Impacts not reviewed outside urban villages.

The comment is acknowledged. Please see response to Keller, Kathryn. Please also see frequent comment response regarding city-wide impacts.

13. Concerns regarding achievement of economic mobility for current residents.

The comment is acknowledged. The evaluation of economic mobility is outside the scope of the proposal and EIS evaluation. However, please see discussion of various demographic factors include income and wealth in Section 3.1 Housing and Socioeconomics.

14. No analysis on marginalized groups moving into urban villages.

It is acknowledged that the Housing analysis in the EIS addresses displacement. The EIS also identifies the potential movement of people into urban villages in the form of estimated population, housing and job increases that are assumed for the city as a whole and for individual urban villages. Section 3.1 also includes demographic information on changes in racial and low-income populations.

15. Failure to analyze affordable and AMI trends.

The comment is acknowledged.

16. Improper calculation for provision of affordable housing through MHA payment option funds.

The comment is acknowledged. Please see also response to Fay, Frank-1.

17. Difference between MHA production through the payment and performance options.

MHA gives developers the option of providing affordable units on-site or through payment of a fee; this option is required by state law (RCW 36.70A.540). The anticipated split between on-site production and fee-based units is based on reasonable assumptions, but how developers will respond cannot be known or predicted with certainty. In general, the city plans to monitor the MHA program as it is implemented over-time and will make necessary adjustments in response to disproportional effects on any individual sub-areas. It is acknowledged and accounted for that there will be a gap of time between development approval, construction and the availability of MHA units. Please see response to Fay, Frank-1.

18. Difference between MHA production through the payment and performance options.

The comment is acknowledged. Please see the response to comment No. 6 above regarding ADUs. Please see frequent comment response concerning family-friendly housing.

19. Difference between MHA production through the payment and performance options.

Please refer to Chapter 2 which includes estimates of employment growth. The comment regarding the relationship between jobs and population growth is acknowledged. Please also see discussion in Section 3.1 Housing and Socioeconomics concerning commercial development.

20. Predicted growth analysis is fatally flawed.

The comment is acknowledged. Estimating population growth is not an exact science, and it cannot reasonably account for or speculate about unknowable future events. Please refer to EIS Appendix G, which describes the methodology used to estimate growth, and the 2035 Comprehensive Plan EIS.

Knight, Dave

1. Supports rezoning remaining single family zoned homes on the 3200 block of Market Street in Ballard.

Comment noted. Please see the Preferred Alternative map for Ballard at Appendix H. Please see also response to Thomas, Rutha.

Knudsen, Constance

1. Alternative 2 and 3 would have impacts on Crown Hill that are too great.

Thank you for your comments. Comments noted. Please see responses to Kreuger, Ingrid-1.

Koehler, Chris

1. Supports upzoning of land near the future Northgate Light Rail station.

Thank you for your comment. Comment noted.

2. Northgate Executive Park has been provided office space for over 40 years. MHA should only apply to development of allowed floor area over and above existing zoning.

MHA framework requirements for commercial development can be seen at Seattle Municipal Code Chapter 23.58B. MHA requirements apply to all new commercial floor area developed. MHA requirements would not apply to existing commercial square footage, in the case of an expansion of an existing structure.

3. Encourage architecturally pleasing new development, allowing for light, air and building articulation.

Comments noted. The proposed SM-Northgate zone includes design parameters such as maximum floor plate limits and upper level setbacks to ensure favorable urban design outcomes.

4. Maintain current parking ratios.

Comments noted.

5. We fully embrace the concept of mixed-use development for the area.

Comments noted. Thank you for your comments.

Koehler, Rich

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Kofmehl, Andri

1. Comments reference West Seattle Junction frequent comments & responses

Please see comment responses to Tobin-Presser, Christy.

Kombol, Todd

1. Concern about impact to single family zone in West Seattle Junction

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle’s single family zoned land.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, many of which include family-size unit types such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas allows for more family-size and family-style housing in areas that are currently zoned single family.

Note also that the proposal includes family-size unit requirements for both market rate and affordable housing performance. Also note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing.

Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

2. Affordable housing should go in existing commercial zones

Please also see EIS Appendix C MHA Implementation Principles, which include “Ensure MHA program creates affordable housing opportunities throughout the city” and “Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.” Locating more housing near transit and amenity-rich areas helps meet goals for reducing car trips and increasing transit use, which support climate mitigation, equity, and livability goals.

3. Affordable housing should be built in cheaper areas needing gentrification

Please see response to comments #1 and 2 above.

Kraft, Sam

1. Commenter supports Alternative 2

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix H Zoning Maps.

2. Upzone as aggressively as possible but offer robust assistance and outreach to most socioeconomically vulnerable groups

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Chapter 3.1 also includes mitigation measures.

Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses payment dollars to fund acquisition and rehabilitation of existing housing, advance homeownership, and more.

3. Impacts on equity and affordability eclipse impacts on residents in single family zones such as parking and traffic

Please see frequent comment response concerning *Single family zones not in the study area*.

4. Supports abolishing single family zoning

Please see frequent comment response concerning *Single family zones not in the study area*.

5. Concern about affordability, equity, density, and climate change

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

6. Character will change but that’s okay

Please see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

7. Concern about sprawl and strain on natural resources

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, including MHA as a mitigation measure for the Seattle 2035 Comprehensive Plan housing impacts. MHA also supports climate change mitigation goals by adding housing capacity near transit, infrastructure, assets, and amenities.

Krom, Georgi

1. Section 3.5 of the DEIS shows no understanding of the area’s history.

See frequent comment response concerning historic resources. See also response to Woo, Eugenia.

2. Financial incentives should be provided for property owners to keep historic homes.

Thank you for your comment. Comment noted. Please see discussion of mitigation measure in Section 3.5 Historic Resources.

3. There is an absence of design criteria, and the lack of sensitivity for the preservation of older buildings in Seattle.

As a Programmatic EIS, project-level issues regarding specific resources are not evaluated. Identification and evaluation of potentially-eligible resources and potential historic districts would occur at the project-level under applicable existing City permitting requirements and design review thresholds.

Krombein, Jon

1. Concern about multifamily development not including multi-bedroom or family-friendly units; there should be a family-size mandate

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, many of which include family-size unit types such as townhomes, rowhouses,

and stacked flats. Expanding these zones, which carry higher density limits than single family areas allows for more family-size and family-style housing in areas that are currently zoned single family.

Note also that the proposal includes family-size unit requirements for both market rate and affordable housing performance. Also note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

2. Concern there is a lack of family-size/family-friendly housing in Seattle

Please see response to comment #1 above.

3. Concern about a lack of family-friendly open spaces

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures.

4. Concern about lack of K-12 public school facility in downtown

Please see frequent comment response concerning *Impacts to Seattle Public School capacity*. This proposal is not specific to downtown, but your comment is noted and will be provided to City decision-makers.

Krueger, Andrew

1. The Crown Hill urban village already has capacity for growth.

Comment noted. Please see response to Kreuger, Ingrid-1, comment 30.

2. Difficulty finding on-street parking.

Comment noted. Please see response Noah, Barbara-18, comment 4.

3. Mass transit can't accommodate growth.

Comment noted.

4. Concern that new development is not conducive to walkability.

Comment noted.

Krueger, Ingrid-1

1. The Seattle 2035 Comprehensive Plan growth estimates are underestimated.

Thank you for your comment. The Seattle 2035 growth estimates are derived from the Washington State Office of Financial Management

projection that is provided to local jurisdictions. Growth estimates are assigned to cities through a multi-county planning process that is led by the Puget Sound Regional Council. The estimates are formally adopted as part of Seattle's Comprehensive Plan. The EIS studies the potential for additional growth beyond the amount estimated in the Seattle 2035 plan. The estimates for any individual urban village are not a limit or maximum. Growth estimates tend to be more reliable at a larger geography, and are more difficult to predict for small geographic areas like urban villages. Pipeline development in the permitting process is included in the growth projections in the EIS. See also Appendix G for discussion of growth estimate methodology.

2. The DEIS underestimates mobility challenges. Urban villages that will not get light rail should not be expanded.

Thank you for your comment. Comment noted. Urban villages expansions studied in the Seattle 2035 Comprehensive Plan are included in the proposed action. Urban villages considered are those that met a transit service threshold of either light rail, or bus service that provides frequent access to more than one urban village.

3. All maps in Appendix A should show boundaries of urban villages and expansion areas.

Thank you for your comment. Maps at Appendix A reflect existing urban village geographies. Maps of potential urban village expansion areas can be seen in Chapter 2.

4. The FEIS should explain delineation between urban villages in different displacement risk and access to opportunity categories. Numerous concerns about how the data used to determine opportunity and displacement risk in the growth and equity analysis.

Thank you for your comment. Comment noted. Please see Appendix A. Please also see frequent comment response concerning the displacement risk and access to opportunity typology. The specific indicators used to construct the displacement risk and access to opportunity types are listed in Appendix A Table 3 and Table 4. Limitations to the data and the currency of information these indices are based upon, are described on page 15 of Appendix A. Despite the limitations, the indicators taken together provide objective information about urban villages based on the sources listed in Tables 3 and 4. This objective information is the most recent, compiled information that was thoroughly vetted and approved which could be used to inform decision makers on the topic of displacement.

The displacement risk and access to opportunity typology provided some input to the formulation of the MHA DEIS alternatives. The indices were used to create varied alternative patterns of the MHA zoning changes and potential growth patterns for study purposes. Specific potential impacts associated with the alternatives, including potential impacts to individual urban villages, are discussed in Chapter 3 of the DEIS.

It is acknowledged that the Crown Hill urban village, though classified as a high opportunity area for study purposes in the EIS is lower than many other urban villages on the opportunity spectrum. However, potential environmental impacts to an urban village are analyzed and disclosed irrespective of how the alternative was formulated.

5. Alternative 3 vastly exceeds Comprehensive Plan estimated growth in Crown Hill and should not be considered a viable alternative.

Comment noted. Please see the Preferred Alternative description in the FEIS. Please also note that the impacts of each alternative are analyzed in Sections 3.1–3.9.

6. The FEIS should include growth estimates specific to each urban village.

Growth estimates are provided for housing units and jobs for each urban village individual in Chapter 2.

7. The Growth and Equity Analysis should be revised to show MHA implementation would impact equity categories.

See discussion of demographic characteristics and direct, economic and cultural displacement in Section 3.1 Housing and Socioeconomics. The growth and equity analysis, or similar demographic analyses are periodically updated by the City.

8. MHA disincentivizes preservation of existing housing that would result in displacement.

Please see discussion of direct, economic and cultural displacement including estimations of displaced and demolished households in Section 3.1 Housing and Socioeconomics.

9. The (M), (M1), (M2) suffixes oversimplify varied degrees of zoning changes.

The MHA suffixes are an approximation of the degree of zoning change, that is also the basis for the level of the affordable housing requirements. Although there is some variation in the height limit increases within an M category, the suffixes are a valuable approximation of the degree of change, because they approximate the overall proportion of the development capacity increase. In some zones that already allow for dense development a zoning increase of two or more stories may be about the same proportion of increase as the allowance of one additional story in a lower-scale zone.

10. The DEIS should analyze whether MHA requirements of different levels will suppress housing development in some zones.

Comment noted. Please see frequent comment response concerning amount of the MHA affordable housing requirements. Please also see discussion in 2.4 alternatives considered but not included in detailed analysis. Please also see comment response to Bertolet, Dan.

11. Maps and tables should more clearly differentiate between M1 and M2 changes.

Comment noted. Please note that a webmap is also available that allows for zooming in on specific areas or parcels to identify zoning designation in each alternative.

12. Exhibits 2.11-2.14 are misleading because they show areas of more intense development in lighter color.

Comment noted.

13. Position of Crown Hill in the opportunity/displacement typology is misleading.

Comment noted. See response 4 above.

14. The FEIS should include growth estimates specific to each urban village.

Growth estimates are provided for housing units and jobs for each urban village individual in Chapter 2.

15. Data in DEIS exhibit 3.1-20 can't be used to assess affordability for urban villages because the real estate market areas and village have different boundaries.

Comment noted. The best available data sources were used. It is acknowledged that exact boundaries do not align.

16. In general data should not be broken down by displacement / opportunity categories.

Comment noted. The data is broken down in this way in order to use the Growth and Equity Analysis as a framework for evaluation.

17. Regarding growth estimates.

See response to 1 and 5 above.

18. Regulations must be enforced to promote vitality and livability.

Comment noted.

19. Alternative 3 is not consistent with is not consistent with comprehensive plan policy for low to moderate density.

Comment noted. Please see the preferred alternative for the Crown Hill urban village, which includes primarily lowrise multi-family and residential small lot zoning as a part of MHA implementation.

20. Alternative 3 concerning gradual transition between zoning designations.

Comment noted. Please see the preferred alternative for the Crown Hill urban village.

21. Larger buildings on 15th will be physical and visual barrier to adjacent neighborhoods.

Comment noted. Depending on design, new residential and commercial development on 15th Ave. can provide improved connections to neighborhoods over existing conditions.

22. Break down by urban village.

Please see response to 16 above.

23. Break down by urban village.

Please see response to 16 above.

24. Displacement potential of rezoning from residential to commercial is not studied.

Comment noted. Please see discussion of impacts associated with intensification of use in Section 3.2 Land Use. Please also see the Preferred Alternative map at Appendix H for the Crown Hill urban village, which includes reduced amounts of conversion to commercial use compared to DEIS alternatives. Most neighborhood commercial uses include a high proportion of residential development in mixed use buildings.

25. Alternative 3 does not support comprehensive plan goals or mitigation.

Please see response to 19 above.

26. Intensity of building scale and right of way manual roadway widths.

Please also see the Preferred Alternative map at Appendix H for the Crown Hill urban village, which includes reduced intensity of zoning fronting onto streets including 16th Ave. NW and Mary Ave. NW. It is acknowledged that the LR2 zone proposed under the Preferred Alternative would front onto 16th Ave. NW and Mary Ave. NW, and the right of way width would be below that listed in the cited in the right of way improvements manual. If implemented, at the time of a project action SDOT would review right of way improvement options for potential compliance with the standard, or alternate improvements that could provide needed pedestrian and vehicle circulation.

27. Concern about detailed analysis of impacts in urban villages.

Comment noted. Please see frequent comment response concerning analysis in individual urban villages. Please see Sections 3.1–3.9.

28. Analysis of action alternatives on neighborhood identity, cohesion and character has not been included.

Comment noted. Please see Section 3.3 Aesthetics. Please see also discussion of cultural displacement in Section 3.1 Housing and Socioeconomics.

29. Analysis of action alternatives on neighborhood identity, cohesion and character has not been included.

Comment noted. Please see Section 3.3 Aesthetics. Please see also discussion of cultural displacement in Section 3.1 Housing and Socioeconomics.

30. Don't expand the Crown Hill urban village without first achieving the Seattle 2035 growth estimates in the existing village.

Comment noted. The proposal to expand the urban village was evaluated as part of the Seattle 2035 planning process, and policies support expansion of urban villages to the 10-minute walkshed. Objectives of MHA implementation include increasing overall housing supply to meet strong demand citywide, and to create at least 6,200 net new income- and rent-restricted housing units.

31. Detailed Crown Hill community planning efforts are needed.

Comment noted. Although outside the scope of this EIS, the City's Office of Planning and Community Development sent a letter to City Council in October of 2017 to City Council documenting a commitment of resources to undertake community planning in Crown Hill in 2018.

32. Analysis of MHA outcomes.

Comment noted. MHA progress and outcomes will be annually evaluated by Office of Housing.

33. Neighborhood plan policies and mitigation measures.

Comment noted. Proposed code amendments regarding criteria for changing zoning from Single Family are land use code locational criteria, and are unrelated to preparation of design guidelines or community plans.

34. Cumulative effects.

Please see frequent comment response concerning cumulative impacts.

35. Include incentives for preservation of existing housing.

Comment noted. The proposed RSL zone includes incentives to preserve the existing single family structure while adding additional housing. MHA funds generated can be used for preservation as well as new construction.

36. Comprehensive Plan policies for a range of single family zones.

Implementation of MHA by applying the proposed RSL zone under action alternatives achieves the cited policies and goals.

37. Revise DEIS exhibit 3.3-1.

Comments noted.

38. Review of aesthetic conditions should be more specific to neighborhoods.

Comments noted. Please see response to Bricklin, David comment 6.

39. Characterization of infill development.

Comments noted.

40. Concerning pattern of development related to Crown Hill neighborhood plan policies.

Comments noted. Please see Preferred Alternative map, in which greater intensity zoning is located in central areas of Crown Hill along 15th Ave. NW, and NW 85th St. RSL and LR zoning is included in most areas off of the arterial roadways. These zones have potential for compatibility with existing scale.

41. Policy concerning range of housing types.

Please see Preferred Alternative map, which supports the policy.

42. Renderings are inaccurate.

Comment noted. See response to Bricklin, David 6.

43. Updates to the design review process.

Comment noted. See updated discussion and thresholds in Section 3.3 Aesthetics.

44. Mandate design guidelines for all urban villages with MHA implementation.

Comment noted.

45. Aesthetic impacts of increased allowable bulk and scale should not be underestimated.

Comment noted. See discussion in Section 3.3. Please see also frequent comment response concerning individual urban village analysis.

46. Images showing existing housing stock and other aspects of potential built form are misleading.

Comment noted. A range of older smaller scale structures and new structures that could be built under existing single family regulations are included. Please see response to Bricklin, David comment 6.

47. Include additional description of privacy standards.

Comment noted. Additional description is included at Appendix F.

48. Urban character.

Comment noted. Additional description is included at Appendix F.

49. Depiction of impacts.

Comment noted. See response to 45 and 46 above.

50. M2 capacity increases in the Eastlake, Upper Queen Anne, and Fremont Urban Villages.

Comment noted. See the Preferred Alternative. Each urban village's existing conditions are unique, and application of MHA in the village will result in different proportions of (M), (M1), or (M2) often depending on the existing mix of zoning in the area. Each of the urban villages mentioned in the comment are occupied by existing commercial and multifamily zones and have little single family zoned land within the urban village.

51. Summary of height increases under alternatives.

Comment noted.

52. Design review thresholds.

Comment noted. Please see updated language in the FEIS for adjustments for design review. The updates include lower thresholds for areas rezoned from single family for MHA implementation.

53. Design guidelines.

Comment noted.

54. Shade / shadow studies.

Comment noted. See discussion of individual urban village review. See also response to Noah, Barbara-8 comment 3.

55. Sidewalks and stormwater infrastructure and pedestrian safety.

The construction of sidewalks and other right of way improvements is generally required with new multifamily development, and for all development within urban villages unless it is a single family home more than 100' from an existing sidewalk. See frequent comment response concerning stormwater infrastructure, and discussion of areas of the city without improved stormwater drainage systems in Section 3.8. See also discussion of pedestrian safety and multi-modal improvements in Section 3.4 Transportation.

56. Mobility needs for urban villages with bus service vs. light rail transit service.

See discussion of transit service in Section 3.4, including discussion of transit capacity under alternatives.

57. Parking mitigation strategies.

See frequent comment response concerning parking impacts and mitigation.

58. 15th Ave. in Crown Hill area omitted from travel corridors.

The transportation model includes all areas and certain corridors are included in tables for summary purposes. This is a programmatic DEIS addressing citywide land use zoning changes, rather than a project-specific proposal. Individual development projects will undergo separate and more detailed SEPA review; specific traffic impacts and mitigation will be determined at that time.

59. Transit boarding locations not included.

The transit model assesses certain locations for summary and analysis purposes. This is a programmatic DEIS addressing citywide land use zoning changes, rather than a project-specific proposal. Individual development projects will undergo separate and more detailed SEPA review; specific transit impacts and mitigation if any would be determined at that time.

60. On 85th between 32nd NW and Greenwood travel times only increase by 30 seconds between alternatives. Why is it such a small amount?

Most travel in the corridor is due to existing traffic or traffic that would occur under no action. The increment of growth under action alternatives has only a small effect on travel times because it generates a small amount of trips relative to overall traffic volumes.

61. Definition of very good transit service.

Comment noted.

62. Proximity to transit shouldn't be used as an indicator in the Growth and Equity analysis.

Comment noted. See frequent comment response concerning the Growth and Equity Analysis.

63. Transit takes too long to get downtown from Crown Hill therefore people will not choose public transportation.

Comment noted. See frequent comment

64. The Ballard bridge mitigation measures should be more detailed.

Comment noted. It is appropriate for some mitigation measures to be discussed generally if they are uncertain.

65. The mitigation measure to purchase additional bus service is insufficient.

Comment noted.

66. Greenways do not offer complete streets and aren't safe for pedestrian.

Comment noted.

67. Growth estimates in the EIS do not align with those considered in the transportation modal plans.

The transportation modal plans consider growth estimates of the Seattle 2035 plan, and the EIS evaluates growth increments in the context of the Seattle 2035 plan. Alternative 1 no action is the Seattle 2035 plan horizon and growth estimates.

68. The EIS underestimates the impact of action alternatives on vehicle trips.

Comment noted. Please see response to 60 above.

69. Cumulative effect.

Please see frequent comment response concerning cumulative impacts.

70. Safety impacts due to cut-through traffic.

This is a programmatic DEIS addressing citywide land use zoning changes, rather than a project-specific proposal. Individual development projects will undergo separate and more detailed SEPA review; specific traffic impacts and mitigation if any would be determined at that time.

71. Systematic historic resources inventories should be conducted for every urban village.

Comment noted. Please see frequent comment response concerning historic resources analysis.

72. There is no specific analysis of tree canopy loss in the Crown Hill urban village.

Comment noted. Please see frequent comment response concerning individual urban village analysis.

73. The DEIS fails to provide information for properties shifting from single family to RSL related to tree canopy, or from converting from single family to multi-family.

The tree canopy assessment includes properties shifting from single family to RSL, and from single family to lowrise and to neighborhood commercial zones.

74. The DEIS fails to account for impact to Piper's Creek watershed, or for stormwater runoff.

Comment noted. See discussion of stormwater drainage systems, and stormwater management requirements for new development. Please also see discussion of environmentally critical areas in Section 3.8.

75. EIS does not evaluate impact of potential tree removal in RSL zones and increase in impervious surfaces.

Comment noted. Tree canopy analysis includes evaluation of conversions to RSL. Please note that additional mitigation measures for tree loss are provided in the FEIS. These include a proposed new tree planting requirement in the RSL zone. Stormwater management requirements apply in the RSL zone.

76. Cumulative effects.

Comment noted. See frequent comment response concerning cumulative impacts.

77. Greenways do not offer complete streets and aren't safe for pedestrian.

Comment noted.

78. Cumulative effects.

Comment noted. See frequent comment response concerning cumulative impacts.

79. Implementing neighborhood plan policies for attractiveness of the business areas.

Comment noted.

80. Consistency with neighborhood plan policies to increase access to open space and recreation.

Comment noted. Please see discussion of impacts to open space availability in Section 3.7.

81. Concerns with adequacy of analysis and mitigation measures for impacts to fire and emergency service response time.

Comment noted. Please see responses to Noah, Barbara-10.

82. The DEIS does not acknowledge that the new North Precinct is on hold.

Comments noted. The EIS notes the additional capacity that would be created "if" a new north precinct is built.

83. Sidewalks.

Comments noted. See response 55 above.

84. School sectors, and inadequate analysis to school capacity.

Comment noted. Please see additional discussion of school capacity in the FIS. Please see new map in the FEIS depicting location of school service areas and urban villages.

85. Sidewalk infrastructure near schools.

Comment noted. Marcus Whitman Middle School is added in the FEIS.

86. Mitigations are inadequate to address flooding.

Comments noted. Please see frequent comment response concerning stormwater infrastructure.

87. Cumulative effects.

Comments noted. Please see frequent comment response concerning cumulative impacts.

88. Cumulative effects.

Comments noted. Please see frequent comment response concerning cumulative impacts.

Krueger, Ingrid-2

1. **Crown Hill urban village is a misnomer because infrastructure and assets are not in place. Any action to implement MHA should be accompanied by infrastructure investment.**

Comments noted. Please see discussion of impacts and mitigations of the alternatives in EIS Sections 3.1-3.8. Please see also responses to Kreuger, Ingrid-1.

Krueger, Ray

1. **The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.**

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

Kuciej, Walter

3. **Opposes policy or use changes for natural parks lands.**

Thank you for your comment. Please see frequent comment response on the topic. No policy or use changes for natural parks lands are proposed as part of the proposed action to implement MHA.

Kutoff, Allan

1. **Change zoning between the Aurora Licton Springs Urban Village and the Northgate Urban Center, from existing SF 7200 to a smaller lot sized single family zoning designation.**

Comment noted. Please see frequent comment response concerning single family areas outside of urban villages.

Labadie, E

1. **Maintain single family character of Ravenna – focus capacity around light rail**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix C MHA Implementation Principles, which include “5. Assets and Infrastructure: a. Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.”

Note that proposed zoning includes Residential Small Lot and lowrise zones, many of which include family-size unit types such as townhomes, rowhouses, and stacked flats. Expanding these zones,

which carry higher density limits than single family areas allows for more family-size and family-style housing in areas that are currently zoned single family.

Please see EIS chapters 3.2 Land Use and 3.3 Aesthetics for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle's single family zoned land.

Please see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

2. Concern about capacity and condition of community spaces, open space, and recreational facilities

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures.

Laban, Patrick

1. Commenter is in favor of affordable housing, concern for displacement

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses payment dollars to fund acquisition and rehabilitation of existing housing.

2. School quality related to market rents

Thank you for your comment. Your comment is noted. Please see frequent comment response concerning *Impacts to Seattle Public School capacity*.

Please also see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, many of which include family-size units such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas allows for more family-size and family-style housing in areas that are currently zoned single family.

Lang, Mona-1

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Lang, Mona-2

1. **The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.**

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

Langhans, Aileen

1. **Commenter writes in support of Historic Seattle formal comment**

Please see comment response to Woo, Eugenia.

Lara, Myra

1. **Apply large upzones in Capitol Hill. Generally supports Alternative 2.**

Thank you for your comment. Comment noted.

2. **Keep the area bounded by E Roy, Broadway, E Olive and I-5 the same, as it contains more low-income households than other locations.**

Thank you for your comment. Comment noted. Please see discussion in Section 3.1 Housing and Socioeconomics regarding direct, economic, and cultural displacement and mitigation measures.

3. **Areas east of Broadway should be Midrise, and the urban village boundary should be expanded to at least Aloha. Expand other urban villages to a 20 minute walkshed from transit.**

Comment noted. Please see the Preferred Alternative map at Appendix H, which includes some Midrise in the area within a 5-minute walkshed of light rail. The Capitol Hill/First Hill urban center was not studied for urban village boundary expansion in the Seattle 20335 comprehensive planning process, and therefore an urban village boundary expansion is not a part of this proposal. 10 minute walksheds from frequent transit were studied as part of the Seattle 2035 Comprehensive Plan and are the basis of proposed urban village expansions in this proposal.

4. **Create more housing options for renters, and do not allow compatibility of scale and character considerations for single family areas prevent more housing options for renters.**

Comment noted. Alternative 2,3 and the Preferred Alternative include zoning changes from single family to other zones that allow greater variety of housing types. Land use and aesthetic impacts are required to be analyzed in the environmental review process for land use actions.

5. Allow increased height for pitched roofs in lowrise multifamily zones.

Existing and proposed development standards in LR zones include height allowance for pitched roofs.

6. Anti-displacement measures other than zoning strategies.

See discussion of direct, economic, and cultural displacement in Section 3.1, including mitigation measures. The FEIS includes additional analysis of displacement and includes discussion of additional mitigation measures.

Lasser, Suzanne

1. Do not implement Alternative 3 in the area at the east side of 18th Ave. E. between Republican and Roy.

Comment noted. Please see the Preferred Alternative map for the area at Appendix H.

Lasser, Suzanne-2

1. Do not upzone blocks between East Republican and East Roy Street in the Madison Miller urban village.

Thank you for your comment. Comment noted. Please see responses to Holliday, Guy concerning the Madison-Miller urban village.

2. Concerned about the loss of green space. Front yard setbacks should be 15-20 feet.

Comment noted. Existing and proposed multifamily zones including LR and MR zones include front side and rear setback requirements. These setbacks are not proposed to be modified as a part of the proposed action.

3. Neighborhoods including Madison Park, Laurelhurst and Capitol Hill north of East Aloha were spared of any upzoning and this is unjust.

Comment noted. See the study area map in Chapter 2, which includes lands currently zoned commercial or multifamily in areas outside of urban villages. See also frequent comment response regarding Single Family zones in areas of the city outside of urban villages.

Lasser, Suzanne-3

1. Supports comments and conclusions of the Madison Miller Park Community Group.

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Latoszek, Mira

1. **Summary of Beacon Hill community survey and community discussion.**

Thank you for your comments, and for your work to conduct the Beacon Hill survey. The results of the Beacon Hill survey were considered along with other community engagement to inform MHA implementation alternatives for North Beacon Hill. See also Appendix B Summary of Community Engagement.

See frequent comment response concerning individual urban village review.

2. **Concerns about the location of MHA affordable housing and displacement. Suggestions for modification of MHA requirements.**

Comments noted. Please see frequent comment responses concerning location of MHA affordable housing, and MHA affordable housing requirements. Please also see expanded discussion of direct, economic and cultural displacement in Section 3.1 Housing and Socioeconomics. Please also see frequent comment response concerning impacts on racial and ethnic minority populations.

3. **Concerns about land use impacts of the urban village expansion under action alternatives.**

Comments noted. Please note that topography is considered in the estimation of the 10-minute walkshed. Shorter distances from the light rail station are included where topography is steep. Please see Section 3.2 for assessment of specific land use impacts.

4. **Concern about impacts to neighborhood character.**

Comments noted. Please note that the citywide urban design guidelines apply to all areas of the city including Beacon Hill. Mitigation measures in Section 3.3 Aesthetics include updates to neighborhood design guidelines.

5. **Concern about traffic impacts.**

Comments noted. Please see discussion and analysis in Section 3.4 Transportation.

6. **Concern about impacts to historic resources.**

Comments noted. Please see frequent comment response concerning historic resources. Please see also response to Woo, Eugenia.

7. **Concern about loss of tree canopy and wildlife.**

Comments noted. Please see frequent comment response concerning tree canopy and response to Early, Tom. Please also note that urban village expansions into environmentally critical area are minimized in the Preferred Alternative.

8. Concern about impacts to open space and recreation.

Comments noted. Please see Section 3.7 Open Space and Recreation including additional discussion of mitigation measures in the FEIS.

9. Concern about impacts to public services and utilities.

Comments noted. Please see Section 3.8. Please see expanded analysis of public school capacity in the FEIS. Please see frequent comment responses concerning stormwater and sanitary sewer infrastructure.

10. Concern about air quality and greenhouse gas emissions.

Comments noted. Please see Section 3.9. Please note the Preferred Alternative limits capacity increases in areas with sensitive environmental conditions including pollutants from major roadways. Comments regarding noise and potential air quality impacts from aircrafts are noted.

Lau, Linda**1. Each Urban Village and surrounding area needs to be analyzed separately via their own individual EIS.**

See Frequent Comment Response to Individual Urban Village Review.

2. The DEIS does not address how the whole City will be impacted by the changes both in this DEIS and the other SEPA analyses combined

See Frequent Comment Response to Citywide Impacts.

Lazerwitz, Jay**1. Schools capacity.**

Please see frequent comment response concerning coordination with Seattle Public Schools, and impacts on Seattle Public Schools. Additional analysis and discussion is added in the FEIS.

2. Focus on family housing.

See frequent comment response concerning family-friendly housing. The proposal includes several integrated plan measures to encourage or require family-friendly housing. Please also see Section 3.1 Housing and Socioeconomics.

3. The DEIS should consider additional mitigation such as waiving MHA requirements for internal conversions or for owner-occupied properties, and new units within existing structures.

Thank you for your comments. Comments noted. The proposal is to implement MHA requirements as codified in SMC Chapter 23.58B and 23.58C.

4. Establish an affordable housing property tax exemption for small properties similar to MFTE.

Thank you for your comments. Comments noted. See discussion in Section 3.1 Housing and Socioeconomics, mitigation measures.

5. Broaden the potential for low-rise development in existing single-family zoning throughout the City, and not just in Urban Villages. Making it easier to build a backyard cottage (DADU).

Thank you for your comment. Comment noted. See frequent comment response concerning single family areas outside of the study area.

LeDuc, Jeanne (SouthEast Effective Development)

1. Include property at 3904 Martin Luther King Jr. Way S. in North Rainier Urban Village.

Comment noted. See Preferred Alternative map for the North Rainier Urban Village at Appendix H, which reflects the urban village expansion. The Preferred Alternative includes emphasis on increasing development capacity on known potential affordable housing sites.

2. Intensification of the property adjacent to Rainier Court Campus.

Comment noted. See Preferred Alternative map for the North Rainier Urban Village at Appendix H.

Leis, Jenny

1. Commenter is not in favor of zone changes in an area of Ravenna

Potential impacts of the alternatives related to compatibility with existing land use patterns are described on DEIS pages 3.97 through 3.118. Consistency with policies and codes is specifically discussed on DEIS pages 3.108 (Alternative 2) and 3.118 (Alternative 3). Mitigation measures to address compatibility and other potential land use impacts are described on pages DEIS pages 3.120 through 3.121.

Zone changes for the area identified by commenter are shown in EIS Appendix H Zoning Maps. This change is consistent with the citywide approach of proposing an M zone change of about one story of height to all existing multifamily and commercial zones outside of urban villages and urban centers.

Lettunich, Mike

1. Each Urban Village and surrounding area needs to be analyzed separately through their own individual EIS.

See Frequent Comment Response to Individual Urban Village Review.

2. The DEIS does not address how the whole City will be impacted by the changes both in this DEIS and the other SEPA analyses combined

See Frequent Comment Response to Citywide Impacts.

Lewis, Maggie

1. Commenter is not in favor of Alternative 3 for Morgan Junction, concern about character

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

Please also see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle's single family zoned land.

Please see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study. Potential impacts of the alternatives related to compatibility with existing land use patterns are described on DEIS pages 3.97 through 3.118. Consistency with policies and codes is specifically discussed on DEIS pages 3.108 (Alternative 2) and 3.118 (Alternative 3). Mitigation measures to address compatibility and other potential land use impacts are described on pages DEIS pages 3.120 through 3.121.

Please also see frequent comment response concerning *Individual urban village review*.

2. Concern about being heard through comment process

Please see EIS Appendix C MHA Implementation Principles, which include "7. Unique Conditions: a. Consider location-specific factors such as documented view corridors from a public space or right-of-way when zoning changes are made." and "8. Neighborhood Urban Design: a. Consider local urban design priorities when zoning changes are made." Please also see EIS Appendix B for a discussion of the MHA community input process and a summary of input received, as well as proposed zone changes guided by community input.

3. Concern there will be too few affordable units, and concern for workers at certain income levels

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that MHA is a new program aimed at addressing housing affordability both through requirements for affordable housing with development and increasing supply overall.

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle

neighborhoods. This chapter also includes mitigation measures that may expand production of affordable housing beyond MHA.

4. Concern about abrupt zone changes, transitions, and neighborhood character

Please see response to comment #1 above. Please also see Please see EIS Appendix C MHA Implementation Principles, which include “3. Transitions: Plan for transitions between higher- and lower-scale zones as additional development capacity is accommodated. a. Zone full blocks instead of partial blocks in order to soften transitions. b. Consider using low-rise zones to help transition between single-family and commercial / mixed-use zones. c. Use building setback requirements to create step-downs between commercial and mixed-use zones and other zones.”

5. Concern about traffic, transit service, and parking

Please see frequent comment responses concerning *Impacts to parking*. Please also see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

Also note that this is a programmatic DEIS addressing area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects required are also unknown. Individual development projects will undergo separate and more detailed SEPA review; including traffic impact analysis, and specific mitigation will be determined at that time.

6. Concern about wildlife habitat in local ravines

Please see FEIS chapters 2.0 and 3.1 discussing the proposed approach to zone changes in Environmentally Critical Areas (ECA), which would include riparian corridors, wetlands, steep slopes, and potential and known landslide areas.

7. Concern about stormwater and sewer capacity

Please see frequent comment response concerning *Impacts to sanitary sewer systems* and *Impacts to Stormwater Infrastructure*.

Low Tsai-Le Whitson, Rose

1. Commenter prefers Alternative 3, concern about displacement and access to opportunity

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix H Zoning Maps.

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

2. Concern that MHA affordable housing production is too low

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that MHA is a new program aimed at addressing housing affordability both through requirements for affordable housing with development and increasing supply overall.

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. This chapter also includes mitigation measures that may expand production of affordable housing beyond MHA.

3. Concern about enforcement of payment option

Please see EIS Chapter 3.1 Housing and Socioeconomics as well as p. 61 of the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses and reports on MHA payment dollars used to fund acquisition and rehabilitation of existing housing.

4. Concern about added cost of SEPA process to projects funded with MHA payments

SEPA standards are determined at the state level and there are no proposed changes at this time. With that said, recent proposed changes to Design Review are intended to facilitate faster review and approval of development that includes the performance option, which include projects funded by MHA payments, all of which are 100% affordable housing.

5. Concern about homeownership

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, many of which include family-size units such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas allows for more family-size and family-style housing in areas that are currently zoned single family.

Note also that the proposal includes family-size unit requirements for both market rate and affordable housing performance. Also note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing.

6. Concern about ADA units

Please see EIS Chapter 3.1 Housing and Socioeconomics for information about housing and support programs that serve persons with disabilities.

7. Concern for increasing impervious surfaces with development

Please see frequent comment response concerning *Impacts to Stormwater Infrastructure*.

8. Concern for mitigation measures for green space

The citywide MHA proposal includes updates to landscaping standards for multifamily and commercial zoning. Please also see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures.

Leykam, Robert

1. Supports a specific zoning change to implement MHA for the entirety of the Photocenter Northwest site.

Please see response to Mason, Marilyn.

Lidman, Monika

1. The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

Likins, Jessica

4. Opposes policy or use changes for natural parks lands.

Thank you for your comment. Please see frequent comment response on the topic. No policy or use changes for natural parks lands are proposed as part of the proposed action to implement MHA.

Lin, IHsuan

1. Supports DEIS Alternative 3.

Thank you for your comments. Your comments are noted. Please see description of the Preferred Alternative in the FEIS at Chapter 2.

Linda

1. Commenter prefers Alternative 3

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

2. RSL is a good transition zone

Please see comment response above and EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

3. Preference for smaller scale increases in density

Please see comment responses above.

Liora**1. Commenter prefers action alternatives**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

2. Prefers considering populations most affected

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

3. Dense development can be aesthetically nice

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures. Please also see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

4. Concern about pedestrian and transit connections between Wallingford and University District

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures. Please also see frequent comment response concerning *Individual urban village review*.

5. Concern about need for more parks and open space

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures.

6. Concern about air quality and noise with increasing traffic

Please see EIS Chapter 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures.

Lipke, Terence

1. **The comment document requests completion of an EIS pertaining to just the South Park neighborhood. The comment document notes that South Park has serious environmental issues, and expresses concern about notice and public engagement.**

Comments noted. Thank you for your comment. Please see frequent comment responses concerning individual urban village review and community engagement. Please see also Appendix B. Please see the Preferred Alternative map at Appendix H for South Park. In recognition of constraints in South Park, the minimum zoning changes necessary to implement MHA are proposed for the South Park area. This approach is consistent with the approach proposed for areas outside of urban villages under the action alternatives.

Lloyd, Katy

1. **Extend the DEIS comment period.**

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

2. **Affordable housing should be built on site.**

Thank you for your comments. Comments noted. Please see frequent comment response concerning location of MHA affordable housing.

Lloyd, Katy-2

1. **The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.**

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

Loeppky, Steve

1. **The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.**

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

Look, Ellen

1. Supports comments and conclusions of the Madison Miller Park Community Group.

Comments noted. Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Lowe, Anne-Marie

1. Concern about “significant controversy” in single family areas

Please see frequent comment response concerning *Community engagement*. Please also see EIS Appendix B for a discussion of the MHA community input process and a summary of input received, as well as proposed zone changes guided by community input.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, many of which include family-size units such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas allows for more family-size and family-style housing in areas that are currently zoned single family.

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle's single family zoned land.

2. Concern about displacement/opportunity typology for Madison-Miller

Please see frequent comment response concerning *Displacement Risk Access to Opportunity Typology*.

3. Concern about pipeline projects already permitted in Madison-Miller, as well as impacts to infrastructure

The EIS accounts for pipeline projects when estimating MHA affordable housing production, understanding that projects already permitted will not contribute to affordable housing payment or performance. The basis for growth projections in the MHA EIS relies on the minimum estimates for future housing and job growth from the Comprehensive Plan. Adopted in 2016, these 20-year growth estimates are based on statewide population forecasts from the Washington State Office of Financial Management (OFM), reflect policy guidance from regional and countywide growth management plans, and are the product of extensive review, including formal adoption by the Seattle City Council and approval by the Washington State Department of Commerce. The urban village growth estimates in Seattle 2035 represent the minimum growth the City must plan for and identify a relative distribution of those new housing units and jobs throughout the city. As part of the Seattle 2035 planning

process, the City also conducted a sensitivity analysis that considered growth of 100,000 net new housing units.

The No Action Alternative relies on the Comprehensive Plan growth estimates for evaluating impacts. The two Action Alternatives consider the possibility of additional growth based on the capacity increases to implement MHA. The Comprehensive Plan growth estimates consider several factors, including land use constraints in urban villages, the proportion of growth expected for different types of urban villages, physical factors such as transportation infrastructure, and historical growth patterns. By building on the comprehensive plan growth estimates, the many assumptions and analyses that informed the Seattle 2035 planning process are integrated into the estimation of additional growth due to MHA implementation.

Please see EIS Appendix G for more detail.

4. Commenter prefers Alternative 1

Thank you for your comment. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix H Zoning Maps.

5. Concern about single family areas outside of urban villages not seeing zone changes

Please see frequent comment response concerning *Single family zones not in the study area*.

6. Concern about historic redline boundary in Madison-Miller

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income and racial minority households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. This revised chapter where EIS examines the history of redlining and discusses how current patterns reflect that history.

Please also see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes; and discussion of urban village boundary expansion areas identified in the Seattle 2035 Comprehensive Planning process.

7. Concern about inadequate open/green space

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures, including updates to Incorporated Plan Elements.

Leutjen, Douglas (Friends of Dakota Place Park)

1. **The EIS is insufficient to inform decision-makers about potential impact to historic resources from development on sites adjacent to landmarked sites including the former City Light substation at Dakota Place Park. Broaden the EIS analysis to include impacts on cultural and historic resources. Revise the MHA policy to include protections for historic resources.**

Thank you for your comment. Comment noted. Please see frequent comment response concerning historic resources. Please also see section 3.3 Aesthetics for review of aesthetic impacts of development under proposed MHA implementation on adjacent sites. Historic preservation protections for landmarked sites would apply under all alternatives. Please see mitigation measures in Section 3.5 Historic Resources.

2. **Exclude the site adjacent from the park from MHA.**

Thank you for your comment. Comment noted.

Luhman, Dale

1. **Commenting on Morgan Junction as well as approach to all urban villages**

Thank you for your comment. Your comment is noted. Please see frequent comment response concerning *Individual urban village review*

2. **Concern about zone changes as top down, engage urban villages individually**

Please see frequent comment response concerning *Community engagement*. Please also see EIS Appendix B for a discussion of the MHA community input process and a summary of input received, as well as proposed zone changes guided by community input.

3. **Concern about lack connection between EIS and Morgan Neighborhood Plan**

Potential impacts of the alternatives related to compatibility with existing land use patterns are described on DEIS pages 3.97 through 3.118. Consistency with policies and codes is specifically discussed on DEIS pages 3.108 (Alternative 2) and 3.118 (Alternative 3). Mitigation measures to address compatibility and other potential land use impacts are described on pages DEIS pages 3.120 through 3.121.

4. **Concern about impact on single family residences**

Please see EIS Chapter 3.2 Land Use and 3.3 Aesthetics for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle's single family zoned land.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative

and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, many of which include family-size units such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas allows for more family-size and family-style housing in areas that are currently zoned single family.

Please also see response to comment #3 above.

5. Concern about single family areas, bulk, shade, and view impacts, trees, parking, parks, police, fire, schools, public transit, and current residents

Please see comment responses above.

Please also see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

Please see frequent comment response concerning *Impacts to parking*.

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures, including updates to Incorporated Plan Elements.

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

Please see frequent comment response concerning *Impacts to Seattle Public School capacity*

SDOT works closely with the Fire Department to maintain access to properties throughout the city. The Fire Department had the opportunity to comment on this EIS and had no comments on emergency vehicle access impacts related to the proposed legislative action.

6. Concern about zone changes without sufficient input from communities affected

Please see response to comment #2 above.

7. Suggestion to allow build-out of No Action Alternative

Please frequent comment response concerning *Alternatives to MHA that could achieve objectives*. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

8. Prefers No Action Alternative, or Alternative 2 without zone changes in single family areas

Please see response to comment #4 above.

9. Concern about zone changes without sufficient input from communities affected

Please see response to comment #2 above.

10. Concern about zone changes without sufficient input from communities affected

Please see response to comment #2 above.

Luong, Dan

1. Strongly supports DEIS Alternative 3 for the Wallingford neighborhood.

Thank you for your comments. Comments noted. Please see Preferred Alternative in the FEIS.

MacDonald, Glenn

1. Concern about displacement risk and access to opportunity in Capitol Hill/First Hill and Miller Park, interest in adding capacity to generate new housing

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix H Zoning Maps for proposed zone changes in the preferred alternative.

Madden, Heidi

1. Study impact of taller buildings on microclimates, including vegetation, light, air, and quality of life

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures; Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures; Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

2. Consider aesthetic impacts of new building types

Please see response to comment #1 above.

3. Consider impacts of more impervious surfaces

Please see frequent comment response concerning *Impacts to Stormwater Infrastructure*.

4. Consider impacts of tree and vegetation removal on air quality

Please see EIS chapters Chapter 3.6 Biological Resources and 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures. Please also see frequent comment response concerning *Impacts on tree canopy*.

Malagon, Mauricio

1. Commenter supports the No Action Alternative, citing impacts to quality of life, neighborhood character

Please see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, many of which include family-size units such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas allows for more family-size and family-style housing in areas that are currently zoned single family.

2. Commenter supports affordable housing, but other areas are better suited for capacity increases

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix C MHA Implementation Principles, which include “Ensure MHA program creates affordable housing opportunities throughout the city” and “Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.” Locating more housing near transit and amenity-rich areas helps meet goals for reducing car trips and increasing transit use, which support climate mitigation, equity, and livability goals.

Maloney, Sue

1. EIS should address urban villages individually.

Please see frequent comment response concerning Individual Urban Village Review.

2. The EIS does not adequately address the city as a whole.

Please see frequent comment response concerning Citywide Impacts to the City as a Whole.

Marjan

1. EIS should address urban villages individually.

Please see frequent comment response concerning Individual Urban Village Review.

2. The EIS does not adequately address the city as a whole.

Please see frequent comment response concerning Citywide Impacts to the City as a Whole.

Martensen, Terri

1. Commenter prefers Alternative 3

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix H Zoning Maps.

2. Concern about parking, recommends parking required per unit

Please see frequent comment response concerning *Impacts to parking*. Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

Martin, Carly

1. EIS does not adequately analyze potential impacts to schools.

Please see frequent comment response concerning coordination with Seattle Public Schools, and analysis of impacts to public schools. The FEIS contains additional analysis.

2. Seattle should have impact fees for schools.

Thank you for your comment. Please see response to 1 above. Please see the mitigations measures concerning public schools in Section 3.8 Public Services and Utilities.

3. Concerned about the child care bonus program.

This bonus program is not currently in place in the study area and would not be affected by the proposal.

4. Put a new high school at Fort Lawton, not Seattle Center.

Fort Lawton and Seattle Center are both outside of the study area for the proposal.

Martin, Sandra-1

1. Concern about heat and glare in absence of vegetation

The EIS scope focuses on elements of the environment most likely to be impacted. Existing regulations controlling light and glare would apply to new construction, and would apply under any of the alternatives. The incrementally larger scale of buildings that could occur on any given development site in the action alternatives compared to no action, would not be expected to produce significantly more light or glare compared to the building that could be built under no action, in scenarios where allowed uses are not altered. As discussed in the Land Use Section 3.2.2 Impacts, additional impacts could result in cases where the action alternative

would allow for an intensification of allowed land use. In these cases, a greater impact on neighboring properties due to increased light and glare could occur, and that greater impact is considered as part of a land use impact identified as a significant impact in some cases. See Section 3.2 Land Use.

Please see EIS chapters 3.6 Biological Resources and 3.7 Open Space and Recreation for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

2. Concern about noise impacts

Consistent with SEPA policies for an EIS, the DEIS includes a focus on the elements most likely to be impacted by the proposal, as determined through the scoping phase.

The EIS scope focuses on elements of the environment most likely to be impacted. Existing regulations including the noise ordinance would apply to new construction, and would apply under any of the alternatives. Noise from construction is expected to occur under all alternatives. Many of the potential development sites under the no action alternative that would have construction activity, would also have construction activity of incrementally larger amounts of housing or commercial construction during the 20-year period. In these cases, the duration of construction noise could be longer to complete larger structures, but would not be expected to produce significantly more construction noise than would occur under no action. However, as discussed in the Land Use Section 3.2.2 Impacts, significant impacts could result in cases where the action alternative would allow for an intensification of allowed land use, which could contribute to the likelihood of redevelopment on sites or areas that would not be likely to redevelop under no action. This includes existing single family zoned areas within urban villages or proposed urban village expansion areas. In these areas, there is potential for a greater impact on neighboring properties due to increased potential for construction-generated noise, and that greater impact is considered as part of the land use impact that is identified as a significant impact in some cases. See Section 3.2 Land Use. In the FEIS, additional language is added in the intensification of use discussion within Section 3.2.2 to more clearly acknowledge potential for increased construction noise.

3. Concern about litter and garbage collection

Please see EIS Chapter 3.8 Public Services and Utilities for discussion of impacts and mitigation measures.

4. Concern about landscaping in the right of way related to walkability

Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*. Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

Martin, Sandra-2

1. Concern for transit as a component of affordability

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix C MHA Implementation Principles, which include “Ensure MHA program creates affordable housing opportunities throughout the city” and “Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.” Locating more housing near transit and amenity-rich areas helps meet goals for reducing car trips and increasing transit use, which support climate mitigation, equity, and livability goals.

2. Focus supply around transit nodes

Please see response to comment #1 above.

3. Concern for equitable distribution of transit resources

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

4. Concern about development already permitted/under construction, and transit is worse

Please see response to comment #3 above.

5. Concern about impacts to parking

Please see frequent comment response concerning *Impacts to parking*.

Martin, Sandy

1. Extend the DEIS comment period.

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Mason, Marilyn (Photographic Center Northwest)

1. We would like our entire site to be zoned NC2P-75 so we can dedicate 10% of residential component to affordable housing if we redevelop in the future.

Please see the Preferred Alternative map for the First Hill-Capitol Urban Center in Appendix H. Under the Preferred Alternative the site would have NCP-75 (M1) zoning.

Masonis, Robert

1. Impacts are not specific enough

Please see frequent comment response concerning *Individual urban village review*. This is a programmatic DEIS addressing area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects required are also unknown. Individual development projects will undergo separate and more detailed SEPA review; including traffic impact analysis, and specific mitigation will be determined at that time.

2. Concern about urban village boundary expansion in Crown Hill on 19th Ave NW, including views and light

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see discussion of urban village boundary expansion areas identified in the Seattle 2035 Comprehensive Planning process. Please also see EIS Appendix H Zoning Maps.

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as mitigation measures. Please also see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

The preferred alternative includes an urban village boundary expansion in Crown Hill that extends to the west of the current boundary between NW 85th Street and NW 90th Street, with along 19th Ave NW.

3. Concern about loss of trees

Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

4. Commenter opposes Alternative 3

Please see response to comment #2 above.

5. Concern about impacts to traffic, parking, and pedestrian infrastructure

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures. Please also see frequent comment response concerning *Impacts to parking*.

6. Concern about westward expansion of Crown Hill urban village, citing impacts on character, traffic, parking, pedestrian infrastructure

Please see comment responses above.

Mauger, Guillaume

1. Insufficient emphasis on green space.

Comment noted. Ground level setbacks in Lowrise and Midrise multifamily zones would not be altered under proposed MHA implementation. Increases to height limit and allowed floor area could allow for taller structures within the same allowed footprint of existing zoning in these zones. See development standards at Appendix F. Impacts to tree canopy are analyzed in Section 3.7 Biological Resources.

2. Insufficient requirements and/or investments in affordable housing.

Proposed action alternatives would all achieve more than 6,200 net new income and rent restricted housing units over a 20-year period. See Section 3.1 Housing and Socioeconomics for discussion of estimated affordable housing under the alternatives.

3. Upzoning is too confined to select areas within the urban village.

The proposal would implement MHA in urban villages and existing commercial and multifamily zoned lands. See frequent comment response concerning single family zones in areas outside of urban villages for further discussion.

4. Insufficient emphasis on aesthetics of new development.

Comment noted. Please see Section 3.2 Aesthetics.

5. Overemphasis on parking and under-emphasis on alternative modes of transportation.

Comment noted. Please see Section 3.4 Transportation, which includes analysis of pedestrian and bicycle network, safety, and mode share. Modifications to the existing RPZ program are discussed as potential mitigation for parking impacts.

Maund, Joyce-1

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Maund, Joyce-2

1. **The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.**

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

McAleer, Bill

1. **The EIS does not include adequate incentives nor protection of older structures. The EIS does not include protections against small business commercial displacement.**

Comment noted. Please see frequent comment response concerning historic preservation. See discussion of cultural displacement in Section 3.1 Housing and Socioeconomics, including mitigation measures.

2. **Larger units and family size housing.**

Please see frequent comment response concerning family-friendly housing.

3. **The affected environment section in Section 3.5 is too general. More resources should be provided for neighborhoods to analyze and preserve historic character.**

Please see frequent comment response concerning historic preservation. Please see mitigation measure in Section 3.5.

4. **The EIS should include all neighborhoods in Seattle.**

The EIS analyzes locations in the study area that are proposed for MHA implementation.

McAlpine, John-1

1. **Extend the DEIS comment period.**

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

McAlpine, John-2

1. **There are major parking constraints in West Seattle.**

Comments noted. Please see Section 3.4 transportation for evaluation of potential parking impacts and mitigation.

1. Displacement of long-term residents.

Comments noted. Please see discussion of direct, economic, and cultural displacement in Section 3.1 Housing and Socioeconomics.

McCarthy, Ryan**1. Comments reference West Seattle Junction frequent comments & responses**

Please see comment responses to Tobin-Presser, Christy.

McCleery, Julie**1. School section is too broad**

Please see EIS Chapter 3.8 Public Services and Utilities for discussion of impacts and mitigation measures. Please see frequent comment response concerning *Impacts to Seattle Public School capacity*. Please see frequent comment response concerning *Individual urban village review*.

This is a programmatic DEIS addressing area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects required are also unknown. Individual development projects will undergo separate and more detailed SEPA review; including school impact analysis, and specific mitigation will be determined at that time.

2. School capacity by neighborhood needs analysis and mitigation measures for any gaps

Please see comment response above.

McCulloch, Garrett**1. Commenter prefers Alternative 3**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

2. Concern that no zone changes are proposed outside of urban villages

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Existing multifamily and commercial areas outside existing or expanded urban villages are generally proposed for zone changes at the M tier. Single family areas outside existing or expanded urban villages are not proposed for zone changes.

Please also see frequent comment response concerning *Single family zones not in the study area*.

3. Concern that lack of capacity in high risk of displacement areas could be detrimental in the long-term

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

Please see EIS Chapter 3.1 Housing and Socioeconomics as well as the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses payment dollars to fund acquisition and rehabilitation of existing housing.

4. Zone changes are not significant enough and should include more single-family areas

Please see frequent comment response concerning *Single family zones not in the study area*.

5. Parking aesthetic is not preferred, and aesthetic transitions could be moderated through more expansive zone changes

Please also see frequent comment response concerning *Single family zones not in the study area*.

6. Alternative 1 creates an unacceptable transportation scenario

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

7. Alternatives 2 and 3 are better for biological resources

Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures.

8. Alternatives 2 and 3 are better for air quality

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix C MHA Implementation Principles, which include “Ensure MHA program creates affordable housing opportunities throughout the city” and “Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.” Locating more housing near transit and amenity-rich areas helps meet goals for reducing car trips and increasing transit use, which support climate mitigation, equity, and livability goals.

McCullough, Jack

1. Flexibility in rezone results for individual sites.

The comment is acknowledged. The MHA proposal is a non-project action, and the EIS addresses impacts at a programmatic level. The alternatives are intended to provide evaluation of a range of potential impacts. If it can be concluded that minor mapping modifications and

adjustments would not exceed the environmental impacts reviewed or alter the conclusions of other environmental analysis, some flexibility in the final rezone results for individual sites could be available to decision-makers.

The EIS does however contain substantial detail, and this environmental information may be used by future project proposals to meet a portion of their individual SEPA requirements; this approach is consistent with several provisions of the SEPA rules. The City would use the information and assumptions in the EIS, including the intensity of development that is assumed, to make appropriate project-specific SEPA determinations. Future project specific development proposals that fall outside the range of the alternatives analyzed in the EIS would need to evaluate their project-specific impacts.

2. IC Zoned Property.

Thank you for the comment. Comment noted. The DEIS includes information on proposed FAR and height increases for the IC zones in Appendix H. Maximum FAR would increase from 2.5 to 2.75. For EIS study purposes, the height increases of 10' are considered in the analysis and reflected on proposed alternative zoning maps. As noted, other adjustments to development standards in IC zones could occur through actions that are separate from this proposal related to industrial lands.

3. New Development Standards.

The proposed new development standards are not expected to reduce the potential for developments to achieve allowable floor area. Appendix E contains prototype development examples depicting hypothetical building designs that achieve maximum allowable floor areas with proposed development standards. All proposed development standards could be departed from through the design review process. Proposed development standards in the LR zones would only apply if the project is not undergoing design review.

McCullough, Mary Kae

1. Concern about displacement in older neighborhoods

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include "9. Evaluate MHA implementation using a social and racial equity/justice lens."

2. Concern that larger buildings create unsafe street-level environments

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures. Note that

development standards and design guidelines include requirements and guidelines for active street frontages for new construction.

3. Concern about historic buildings and interest in retrofits

Please see EIS Chapter 3.5 Historic Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Analysis of historic resources*. Additional discussion of Unreinforced Masonry buildings and related issues is added to the FEIS.

4. Open space should include open air space, concern about natural light and health

Section 3.3.3 Aesthetics describes several mitigation measures identified to at least partially mitigate potential aesthetic impacts.

McCumber, Mary

1. EIS must address the important contribution of older buildings to affordability and livability. Older buildings provide diverse housing types, including affordable housing.

Thank you for your comments. Please see response to frequent comment concerning historic preservation. Please also see response to Woo, Eugenia. Please see discussion of housing affordability, including discussion of housing affordability by age of structure in Section 3.1 Housing and Socioeconomics.

McMillen, Roger

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

McRory, Amy

1. Supports comments and conclusions of the Madison Miller Park Community Group.

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Medina, Rosario

1. Zone changes do not fit all neighborhoods in Seattle; should be designed by communities

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative

and methodology for proposed zone changes. Please see frequent comment response concerning *Individual urban village review*.

2. Concern about displacement and outcomes of the payment option; TRAO only goes so far and not many know about it

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

Please also see frequent comment response concerning *MHA affordable housing requirements* and Location of MHA housing units. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

3. Commenter prefers protecting single family zoning; concern about health impacts, homeownership, cost of rent

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, many of which include family-size units typically providing ownership options, such as townhomes, rowhouses, cottages, and stacked flats. Expanding these zones, which carry higher density limits than single family areas allows for more family-size and family-style housing in areas that are currently zoned single family.

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle's single family zoned land.

Note also that the proposal includes family-size unit requirements for both market rate and affordable housing performance. Also note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

4. Concern about green space, flooding, and historic buildings

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix C MHA Implementation Principles, which include "Ensure MHA program creates affordable housing opportunities throughout the city" and "Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit."

Locating more housing near transit and amenity-rich areas helps meet goals for reducing car trips and increasing transit use, which support climate mitigation, equity, and livability goals.

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures, including updates to Incorporated Plan Elements.

Please also see frequent comment response concerning *Impacts to Stormwater Infrastructure*.

See frequent comment response concerning *Historic Resources* for discussion of this issue. See also response to Woo, Eugenia.

5. Concern about insufficient public transit to the Duwamish Valley

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

6. Frustration with outreach and planning efforts

Please see frequent comment response concerning *Community engagement*. Please also see EIS Appendix B for a discussion of the MHA community input process and a summary of input received, as well as proposed zone changes guided by community input.

7. Concern about tree canopy and flooding

Please see frequent comment responses concerning *Impacts to Stormwater Infrastructure* and *Impacts on tree canopy*.

8. Concern about open space in the Duwamish Valley

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures, including updates to Incorporated Plan Elements.

9. Concern about access to a variety of assets, amenities, and public services

Please see EIS Chapter 3.8 Public Services and Utilities for discussion of impacts and mitigation measures.

10. Concern about air quality in the Duwamish Valley

Please see EIS Chapter 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures.

Melissa

1. Comments reference West Seattle Junction frequent comments & responses

Please see comment responses to Tobin-Presser, Christy.

Mermelstein, Jon

1. Commenter supports housing options, concern that single-family areas not included in zone changes

Thank you for your comment. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Existing multifamily and commercial areas outside existing or expanded urban villages are generally not proposed for zone changes beyond the M tier. Single family areas outside existing or expanded urban villages are not proposed for zone changes.

Please see frequent comment response concerning *Single family zones not in the study area*.

Mikkelsen, Susan-1

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

2. Are realtors notifying buyers of potential changes to zoning when purchasing a home?

The City is not involved in private purchases of property. Please see frequent comment response concerning community engagement for information on City outreach efforts related to the MHA proposal.

Mikkelsen, Susan-2

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Miles, Don

1. Interest in MHA payments funding seismic retrofits for URM buildings

Your comment is noted and will be provided to City decision-makers.

Miller, Karin

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June

29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Mirra, Nicholas

1. Commenter supports zoning that allows for increased density around transit and removing parking requirements

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix C MHA Implementation Principles, which include “Ensure MHA program creates affordable housing opportunities throughout the city” and “Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.” Locating more housing near transit and amenity-rich areas helps meet goals for reducing car trips and increasing transit use, which support climate mitigation, equity, and livability goals.

Please also see EIS Appendix H Zoning Maps.

Note that parking is not currently required for multifamily development in urban villages.

2. Concern for aesthetic variety of new development

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures. Note that there are new design guidelines in development across multiple city neighborhoods.

3. Interest in removing parking requirements

Note that parking is not currently required for multifamily development in urban villages.

Misha

1. through 3. Concern about affordability requirements being too low

Please see frequent comment response concerning *MHA affordable housing requirements*.

4. Concern about trees and open space

Please see EIS chapters 3.6 Biological Resources and 3.7 Open Space and Recreation for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

5. Concern about Metro bus transit

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

6. Concern about neighborhood character and small businesses

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures. Please also see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

7. Concern about wildlife, trees, and parks

Please see EIS chapters 3.6 Biological Resources and 3.7 Open Space and Recreation for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

8. Concern about trees and green space

Please see comment responses above.

9. Interest in impact fees for utilities

Please see EIS Chapter 3.8 Public Services and Utilities for discussion of impacts and mitigation measures. Also note that the proposal is aimed at providing additional affordable housing so the City intends to pursue mitigation measures that will alleviate impacts while still achieving the goal of improved housing affordability. Nothing in this proposal impedes the ability of the City to pursue implementation of an impact fee program.

10. Concern about trees and green space

Please see comment responses above.

Mittell, Mary

1. Concerned that proposed action is a boon for developers.

Comments noted. Please see frequent comment response concerning the MHA affordable housing requirement. Please see FEIS Chapter 2. Please see Section 3.4 Transportation.

Moehring, David

1. Concern that new development won't be affordable

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that MHA is a new program aimed at addressing housing affordability both through requirements for affordable housing with development and increasing supply overall.

Please also see EIS Chapter 3.1 Housing and Socioeconomics as well as p. 61 of the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses and reports on MHA payment dollars used to fund acquisition and rehabilitation of existing housing.

2. Concern that payment levels are too low

Please see response above.

Mohler, Rick

1. Comments on the Alternatives

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix H Zoning Maps.

2. Cautious endorsement of Alternative 2

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix H Zoning Maps.

3. Concern about long-term impacts of single family zoning on affordability and environmental sustainability

Please see frequent comment response concerning *Single family zones not in the study area* and *Alternatives to MHA that could achieve objectives*.

4. Scope of EIS should be expanded to include all single-family zones

Please see response to comment #3 above.

5. Support for parking reform including parking maximums

Please see frequent comment response concerning *Impacts to parking*.

Momoda, Ron

1. Concern about Alternative 2 zone changes impacting displacement; concern about adequacy of DEIS socioeconomic analysis

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

2. Alternative 3 considers displacement risk

Please see comment response above.

3. Commenter prefers Alternative 3

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please see EIS appendices F Summary of Changes to the Land Use Code and H Zoning Maps.

Morris, Stephanie

1. Concern about school capacity analysis, interest in impact fees

Please see frequent comment response concerning *Impacts to Seattle Public School capacity*.

The proposal is aimed at providing additional affordable housing so the City intends to pursue mitigation measures that will alleviate impacts while still achieving the goal of improved housing affordability. Nothing in this proposal impedes the ability of the City to pursue implementation of an impact fee program.

Morrison, Ian-1

1. FEIS must provide more information and evaluation of proposed SM-RB zoning. The zoning pattern to the northwest of light rail in Rainier Beach should provide a graceful transition to lower scale townhouse development.

Thank you for your comment. The FEIS includes additional description of the proposed SM-RB zoning in Appendix F. See the Preferred Alternative map for the Rainier Beach Urban Village at Appendix H. The Preferred Alternative includes a 55' height limit for a portion of the properties. Land use impacts of the proposed SM-RB zone proposed in the Preferred Alternative are discussed in Section 3.2. The SM-RB zone would include specific development standards to provide graceful transitions and mitigate potential bulk and scale impacts from new development.

Morrison, Ian-2

1. The EIS should study an expansion of the Ballard Urban Village to include

lands bordered by NW 49th Street, 8th Avenue NW, NW 48th Street and 9th Avenue NW.

Comment noted. The EIS study area does not include Industrial Buffer (IB) zoned land that is within designated Manufacturing Industrial centers. The area is not a part of proposed MHA implementation. Inclusion of industrial lands within manufacturing industrial centers in MHA was considered but not included for detailed analysis due to potential conflicts with other comprehensive plan policies concerning industrial lands.

Morrow, Michael

1. Concern that zone maps do not consider local subtleties

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix C MHA Implementation Principles, which include:

- Unique Conditions a. Consider location-specific factors such as documented view corridors from a public space or right-of-way when zoning changes are made.
- Neighborhood Urban Design a. Consider local urban design priorities when zoning changes are made.
- Ensure MHA program creates affordable housing opportunities throughout the city Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.

Locating more housing near transit and amenity-rich areas helps meet goals for reducing car trips and increasing transit use, which support climate mitigation, equity, and livability goals.

2. Concern about a particular area near Volunteer Park, scale of zone changes

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Zone changes for the area identified by commenter are shown in EIS Appendix H Zoning Maps. This change is consistent with the citywide approach of proposing an M zone change of about one story of height to all existing multifamily and commercial zones outside of urban villages and urban centers.

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures. Please also see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

Potential impacts of the alternatives related to compatibility with existing land use patterns are described on DEIS pages 3.97 through 3.118. Consistency with policies and codes is specifically discussed on DEIS pages 3.108 (Alternative 2) and 3.118 (Alternative 3). Mitigation measures to address compatibility and other potential land use impacts are described on pages DEIS pages 3.120 through 3.121.

3. Concern about parking

Please see frequent comment response concerning *Impacts to parking*.

4. Concern about quality of life and aesthetics, transitions, consistency

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures. Please also

see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

Potential impacts of the alternatives related to compatibility with existing land use patterns are described on DEIS pages 3.97 through 3.118. Consistency with policies and codes is specifically discussed on DEIS pages 3.108 (Alternative 2) and 3.118 (Alternative 3). Mitigation measures to address compatibility and other potential land use impacts are described on pages DEIS pages 3.120 through 3.121.

Motzer, Tim-1

1. **The amount of opens space required to mitigate the significant adverse**

impacts associated with Alternatives 2 and 3 appear not to be achievable without funding.

Comment noted. The DEIS includes description of mitigation measures that could be taken to at least partially mitigate the identified impact. The FEIS includes additional discussion of the mitigation measures. The identified mitigation measures include approaches to increase funding, including impact fees. The identified mitigation measures also include adjustments to level of service standards to consider quality of parks facilities and programming in addition to a solely quantity-based standard.

2. **The amounts established for payment in lieu for MHA are below what it will cost to build them, and will result in a low number of units.**

See response to Fay, Frank-1 concerning affordable housing units generated from payment vs. performance. MHA payment requirements are calibrated to be equal in cost to the cost that would be incurred by a developer for including the units on site. A rent differential between market rate rent and rent at the 60% AMI level is estimated, and the differential is capitalized using a capitalization rate to set the required payment amount. Other factors including market strength of the neighborhood are considered in the calculation.

Motzer, Tim-2

1. **Concern about the impact of potential tower structures that would be allowed under Alternative 2 on several parcels in Lake City.**

Comment noted. Please see the Preferred Alternative map for Lake City at Appendix H, which includes MHA implementation for the area in question with height increases of 1 story.

2. **Concern about lack of participation in generating MHA implementation alternatives.**

Please see frequent comment response concerning community engagement. Please also note that the City is using the SEPA

process to test and evaluate potential impacts from a range of alternatives, and to use the SEPA process to identify a Preferred Alternative.

Moyer, Erin

1. **Concern about loss of family friendly “missing middle” housing, and displacement of lower and middle-income homeowners.**

Please see frequent comment response regarding family-friendly housing. Please see Section 3.1 Housing and Socioeconomics including discussion of direct, economic and cultural displacement. Section 3.1 includes data in the affected environment section on housing affordability for different demographic populations.

2. **Concern that the MHA payment option will lead to greater segregation, by isolating from market-rate housing.**

Please see frequent comment response concerning location of MHA affordable housing. Please see the discussion Historical Context of Racial Segregation in Housing and Socioeconomics section, which is new to the FEIS.

3. **Supports comments and conclusions of the Madison Miller Park Community Group.**

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

4. **Concerned with lack of engagement with residents.**

Please see frequent comment response concerning community engagement.

Mueller, Melinda

1. **Commenter opposes Alternative 3 for Crown Hill, concern about infrastructure, prefers Alternative 2**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix C MHA Implementation Principles, which include “Ensure MHA program creates affordable housing opportunities throughout the city” and “Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.” Locating more housing near transit and amenity-rich areas helps meet goals for reducing car trips and increasing transit use, which support climate mitigation, equity, and livability goals.

2. **Concern about displacement in north Crown Hill**

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between

housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

3. Pipeline projects not considered in growth estimate, mitigations insufficient

The EIS accounts for pipeline projects when estimating MHA affordable housing production, understanding that projects already permitted will not contribute to affordable housing payment or performance. The basis for growth projections in the MHA EIS relies on the minimum estimates for future housing and job growth from the Comprehensive Plan. Adopted in 2016, these 20-year growth estimates are based on statewide population forecasts from the Washington State Office of Financial Management (OFM), reflect policy guidance from regional and countywide growth management plans, and are the product of extensive review, including formal adoption by the Seattle City Council and approval by the Washington State Department of Commerce. The urban village growth estimates in Seattle 2035 represent the minimum growth the City must plan for and identify a relative distribution of those new housing units and jobs throughout the city. As part of the Seattle 2035 planning process, the City also conducted a sensitivity analysis that considered growth of 100,000 net new housing units.

The No Action Alternative relies on the Comprehensive Plan growth estimates for evaluating impacts. The two Action Alternatives consider the possibility of additional growth based on the capacity increases to implement MHA. The Comprehensive Plan growth estimates consider several factors, including land use constraints in urban villages, the proportion of growth expected for different types of urban villages, physical factors such as transportation infrastructure, and historical growth patterns. By building on the comprehensive plan growth estimates, the many assumptions and analyses that informed the Seattle 2035 planning process are integrated into the estimation of additional growth due to MHA implementation.

Please see EIS Appendix G for more detail.

4. Concern about changes to Design Review, concern about ROW pavement width requirements

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as mitigation measures. Note that proposed changes to the Design Review Program as discussed by City Council in September 2017 include lowering thresholds for some areas where zone changes occur through MHA.

5. Concern about transit service and parking

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, Chapter 3.4 Transportation for discussion of impacts and mitigation measures. Please see frequent comment response concerning *Impacts to parking*.

6. No systematic historic resources inventory showing loss

The proposal to implement MHA is not a direct impact because it does not directly cause any physical alteration or immediate effect on any historic resource. Future development under new zoning regulations may or may not occur on the site of a historic resource in the future. Discussion of systematic historic surveys, refers to neighborhoods in the study area, where a systematic inventory has been conducted.

7. Concern about loss of trees and lack of mitigation, concern about stormwater impacts on Piper Creek

Please see frequent comment response concerning *Impacts to Stormwater Infrastructure*.

This is a programmatic DEIS addressing area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects required are also unknown. Individual development projects will undergo separate and more detailed SEPA review, and specific mitigation will be determined at that time.

8. Concern about police response time

Please see DEIS Chapter 3.8 concerning Public Services and Utilities: “demand on fire and emergency services would be identified and managed as the project is implemented” and “impacts on fire and emergency services as a result of demand increases would be identified and managed during the project approval process.”

9. Concern about increasing car use and air quality

Please see EIS Chapter 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures.

Please also see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix C MHA Implementation Principles, which include “Ensure MHA program creates affordable housing opportunities throughout the city” and “Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.”

Locating more housing near transit and amenity-rich areas helps meet goals for reducing car trips and increasing transit use, which support climate mitigation, equity, and livability goals.

Muller, Michael

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Murakami, E R

1. **Concern about housing density in Crown Hill, does not prefer Alternative 3, concern about transitions, single family homes**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives and EIS Appendix H Zoning Maps.

Please also see EIS Appendix C MHA Implementation Principles, which include

- Transitions: Plan for transitions between higher- and lower-scale zones as additional development capacity is accommodated.
 - a. Zone full blocks instead of partial blocks in order to soften transitions.
 - b. Consider using low-rise zones to help transition between single-family and commercial / mixed-use zones.
 - c. Use building setback requirements to create step-downs between commercial and mixed-use zones and other zones.

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle's single family zoned land.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, many of which include family-size units such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas allows for more family-size and family-style housing in areas that are currently zoned single family.

2. **Concern about parking and insufficient transit in Crown Hill**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, and Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

Please also see frequent comment response concerning *Impacts to parking*.

Murdock, Vanessa (Seattle Planning Commission)

1. **Determine urban village boundaries by a 10-minute walk to transit.**

Comment noted. The Preferred Alternative includes urban village expansions to a 10-minute walkshed from frequent transit nodes for urban villages studied for expansion in the Seattle 2035 Comprehensive Plan.

2. Implement capacity increases with proportions similar to Alternative 3.

Comment noted. The Preferred Alternative implements capacity increases in similar proportions to Alternative 3 with regard to urban villages' displacement risk and access to opportunity category.

3. Expand urban village boundaries to include public investments such as parks.

Comment noted. See the Preferred Alternative maps at Appendix H.

4. Expand urban villages to include more areas between urban villages.

Comment noted. Urban villages boundary expansions considered at the time of MHA implementation are for those areas studied for urban village boundary expansion in the Seattle 2035 Comprehensive Plan process. Other expansions could be considered as part of annual Comprehensive Plan amendment docketing, which is outside the scope of the proposal reviewed in this EIS.

5. Consider greater residential density around high capacity transit.

Comment noted. See Preferred Alternative maps at Appendix H.

6. In areas with high displacement risk, shift capacity increases toward a denser node at the core of the urban village.

Comment noted. See Preferred Alternative maps at Appendix H. In the Preferred Alternative (M1) and (M2) MHA tier capacity increases in urban villages with high displacement risk are only located within a 5-minute walkshed from a frequent transit node.

7. Study future urban village boundary expansions in other urban villages with high access to opportunity and low displacement risk.

Comment noted. See response to 4 above.

8. Allow multiple developments in an urban village to pool MHA requirement for performance units.

Comment noted. MHA-R framework legislation establishing basic MHA structures and mechanisms was adopted by City Council prior to this action and alterations to the framework components are outside the scope of the EIS.

9. Waive or reduce MHA payment requirements in the RSL or LR1 zones to encourage retention of homeownership.

Comment noted. As an integrated part of the proposal, development standards for the RSL zone will include an exemption from MHA payment, for a portion of the square footage in a preserved existing single family home when other homes are added to the lot in an RSL zone.

10. Discourage large new detached housing in RSL

Comment noted. As an integrated part of the proposal, development standards for the RSL zone include a maximum 2,200 square footage size limit for single dwelling units.

11. Minimize the amount of RSL and LR1 zoning in urban villages with high access to opportunity and low displacement risk.

Comment noted. See the Preferred Alternative maps at Appendix H.

12. Incentivize development to choose performance especially in areas of high displacement risk.

Comment noted. See also response to 8 above.

13. Offer technical assistance to small builders who provide performance units.

Comment noted. See also response to 8 above.

14. Increase city subsidies for ownership units.

Comment noted.

15. Use Only in Seattle grants to keep small businesses and community anchors in place.

Comment noted. See cultural displacement mitigation measures in Section 3.1 Housing and Socioeconomics.

16. Explore exempting property taxes for seniors and low-income home owners.

Comment noted.

17. Clearly state assumptions in the Housing and Socioeconomics section related to displacement.

Comment noted. Additional text and footnotes are added to Section 3.1 to disclose assumptions and state the limitations of the analysis due to available data.

18. State how shadows are measured and at what time of day in the Aesthetics section. Add definition of protected view corridors.

Comment noted. See additional discussion of view protection regulations in section 3.2 Land Use.

19. Changing the threshold for acceptable congestion does not mitigate the impact in the transportation section.

Comment noted. An increase in the screenline threshold is listed beside other potential mitigation measures. Language is adjusted in the FEIS for clarity.

20. Some historic districts may need to be expanded to further protect historic resources.

Comment noted.

21. Provide better transit to the largest parks and open spaces as a mitigation measure.

Comment noted. See expanded discussion of mitigation measures for impacts to Open Space and Recreation in the FEIS.

22. Consider more critical analysis of the strategic plans of public service provider agencies.

Comment noted. See additional discussion of impacts and mitigation measures related to public schools in Section 3.8 Public Services and Utilities.

23. We support the 2016/17 amendment to the comprehensive plan for air quality effects on sensitive land uses.

Comment noted. See Preferred Alternative maps at Appendix H. MHA implementation is limited to the lowest capacity increase necessary to implement MHA within 500 feet of highways.

Neighbor

1. Commenter opposes zone changes in West Seattle

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

2. Concern for livability, traffic, tree canopy, green space, sewer lines, alternatives under existing zoning

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures.

Please see frequent comment responses concerning *Impacts to sanitary sewer systems* and

Impacts to Stormwater Infrastructure.

Please frequent comment response concerning *Alternatives to MHA that could achieve objectives*.

3. Concern about single family home renters, including families

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see mitigation measures in that chapter discussing incorporated plan features. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include "9.

Evaluate MHA implementation using a social and racial equity/justice lens.”

4. Concern about green space and stormwater runoff

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures. Please also see frequent comment response concerning *Impacts to Stormwater Infrastructure*.

5. Concern about landscaping and stormwater runoff

Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, including incorporated plan elements updates to Green Factor, emphasizing tree canopy. Please also see frequent comment response concerning *Impacts to Stormwater Infrastructure*.

6. Concern about accuracy of transportation analysis, and family-size housing

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle’s single family zoned land.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, many of which include family-size units such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas allows for more family-size and family-style housing in areas that are currently zoned single family.

Note also that the proposal includes family-size unit requirements for both market rate and affordable housing performance. Also note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

Please also see frequent comment response concerning West Seattle Junction.

7. Concern about public transportation options

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

8. Concern about green and open space

Please see responses to comments 2, 4, and 5 above.

9. Concern about sewer and stormwater infrastructure

Please see frequent comment responses concerning *Impacts to sanitary sewer systems* *Impacts to Stormwater Infrastructure*.

10. Concern about accommodating private vehicles and concern for family-size housing

Please see frequent comment response concerning *Impacts to parking*. Please also see response to comments 6 and 7 above.

Neeson, Edie

1. The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

Nelson, Shirley

1. It is unfair to have one set of guidelines for all urban villages.

Comment noted. See frequent comment response concerning analysis for individual urban villages.

2. Business impacts do not seem to be considered.

Please see growth projections in Chapter 2.0, which include both commercial and residential growth estimations. Please see discussion of businesses under cultural displacement in the impacts subsection of Section 3.1 Housing and Socioeconomics.

3. Concern about public transportation.

Comment noted. See frequent Section 3.4 Transportation.

4. Concern about sanitary sewer infrastructure.

Comment noted. See frequent comment response concerning sanitary sewer infrastructure.

5. Concern that the addition of condos and apartments strains resources.

Comment noted.

6. We (Wallingford) do not have a community center.

Comment noted.

7. Our parks are full and overflowing.

Comment noted. Please see Section 3.7 Open Space and Recreation.

8. There are not resources or space to make changes to single family residential areas to multi-family residential.

Comment noted.

9. There is no room for Wallingford to grow in any category.

Comment noted.

Nesoff, Tema

1. Concern that DEIS is not easily accessible to the general public, cites planning jargon

Thank you for your comment. Your comment is noted.

2. Concern about lack of affordability, livability, and community planning

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that MHA is a new program aimed at addressing housing affordability both through requirements for affordable housing with development and increasing supply overall.

Please also see EIS Appendix C MHA Implementation Principles, which include “Ensure MHA program creates affordable housing opportunities throughout the city” and “Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.” Locating more housing near transit and amenity-rich areas helps meet goals for reducing car trips and increasing transit use, which support climate mitigation, equity, and livability goals.

3. Question about areas not included in proposal

Thank you for your comment. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Chapter 2.0 also includes discussion of the Seattle 2035 Comprehensive Plan Urban Village strategy. Please also see EIS Appendix C MHA Implementation Principles, which include “Ensure MHA program creates affordable housing opportunities throughout the city” and “Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.” Existing multifamily and commercial areas outside existing or expanded urban villages are proposed for zone changes at the M tier. Both areas discussed are within or partially within two of Seattle’s Manufacturing and Industrial areas, which are not areas identified for residential growth in the Comprehensive Plan.

4. Concern about aesthetics, lack of setbacks, and green space

Please see EIS Chapter 3.3 Aesthetics for discussion of development standards, including setbacks, and the Design Review Program as well as other mitigation measures. Please also see EIS

Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

5. Concern about lack of parking with new development

Please see frequent comment response concerning *Impacts to parking*.

Newell, Mark

1. Comments refer to those provided by Madison-Miller Park community group

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Newland, Sophie

1. Keep Seattle Public Schools capacity challenges high in the list of considerations as you implement MHA and mitigate impacts.

Comment noted. Please see frequent comment responses concerning coordination with Seattle Public Schools, and additional discussion of impacts and mitigations in FEIS Section 3.8 Public Services and Utilities concerning public schools.

Nichols, Liz

1. Supports comments and conclusions of the Madison Miller Park Community Group.

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Nicholson, Bradley

1. The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

Nickel, Dick

1. **Concern about sewers, wastewater systems, and utility capacity**

Please see DEIS Chapter 3.8 concerning Public Services and Utilities as well as frequent comment responses concerning *Impacts to sanitary sewer systems* and *Impacts to Stormwater Infrastructure*.

Nielsen, Steve

1. **Commenter discusses a particular parcel in the Northgate Urban Center**

Thank you for your comment. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Existing multifamily and commercial areas outside existing or expanded urban villages are generally not proposed for zone changes beyond the M tier. Single family areas outside existing or expanded urban villages are not proposed for zone changes. The area in question is a single family area outside of an existing urban village or expansion area. The change requested is not part of the current proposal.

Nikolaus, Sheena

1. **Keep Seattle Public Schools capacity challenges in the forefront of considerations as you implement MHA and mitigate impacts.**

Comment noted. Please see frequent comment responses concerning coordination with Seattle Public Schools, and additional discussion of impacts and mitigations in FEIS Section 3.8 Public Services and Utilities concerning public schools.

2. **The City and a School District should work together to plan for a school at Fort Lawton.**

Comment noted. Fort Lawton is outside of the study area. Potential reuse of the Fort Lawton site is being considered as a separate action with environmental review.

Nighthawk

1. **Opposes the proposal unless it is vastly modified.**

Comments noted.

Noah, Barbara-1

1. **EIS should address urban villages individually.**

Please see frequent comment response concerning Individual Urban Village Review.

2. The EIS does not adequately address the city as a whole.

Please see frequent comment response concerning Citywide Impacts to the City as a Whole.

Noah, Barbara-2

1. No alternatives are analyzed.

Please see frequent comment response concerning alternatives that could meet the objective.

Noah, Barbara-3

1. The MHA-R framework did not undergo environmental review. The MHA-R framework should be a part of the current DEIS or subject to separate SEPA review.

Please refer to the response to Raaen, Lee comment No. 2 regarding environmental review for the MHA framework.

Noah, Barbara-4

1. The EIS should discuss impacts in terms of loss of existing affordable housing.

Thank you for your comments. Comments noted. Please see discussion of direct displacement and demolition estimates in Section 3.1 Housing and Socioeconomics.

2. The Historic Resources section lacks meaningful analysis.

Comments noted. Please see frequent comment response concerning analysis of historic resources. See also response to Woo, Eugenia. Please see additional discussion of historic resources context and mitigation measure in the FEIS Section 3.5.

3. Listing of NRHP sites is provided without context.

Comments noted. Please see response to Woo, Eugenia, comment 3.

Noah, Barbara-5

1. Concern about aesthetic impacts of new development being out of scale with historic pattern of development.

Comment noted. Please see Section 3.3 Aesthetics.

Noah, Barbara-6

1. **DEIS should provide substantive mitigation measures. It is unclear in the mitigation measures section of the Historic Resources chapter which mitigation measures will be taken seriously.**

Comment noted. Please see revised discussion of mitigation measures in the Historic Resources Section 3.5.

2. **Supports Historic Seattle comment letter concerning the approach to mitigation.**

Comment noted. Please see comment response to Woo, Eugenia.

3. **Include strategies for adding density using vacant and underdeveloped areas.**

Comment noted. Please see section 3.1 Housing and Socioeconomics Exhibit 3.1-38 for an estimation of demolished housing unit under the alternatives. Sites that are vacant or underdeveloped are among the most likely sites to be redeveloped with housing or commercial uses.

Noah, Barbara-7

1. **Describes other alternatives that should be included.**

Comments noted. Please see frequent comment response concerning alternatives that could meet the objective.

2. **EIS should analyze the alternative's compatibility with the Seattle 2035 planning estimates.**

Alternative 1 No Action is the 20-year planning horizon of the Seattle 2035 Comprehensive Plan. The Action Alternatives consider the impacts of MHA implementation over the 20-year planning horizon. The Action Alternatives review for potential impacts stemming from an increment of growth that could occur over the 20-year planning horizon due to increases in development capacity.

3. **The EIS should provide maximum zoned density information.**

Please see DEIS Exhibits 3.1-33 and 3.1-34, which present information on total development capacity under the alternatives.

4. **Alternative 1 was not analyzed for sufficiency to meet current and projected demand.**

Alternative 1 uses the formally adopted 20-year growth estimates of the Seattle 2035 Comprehensive Plan. Growth estimates in the alternatives are adjusted to take into account pipeline development projects. Please see Appendix G for information on growth estimate methods.

5. **It is incorrect to assume affordable housing units created will be located in areas with high access to opportunity.**

Please see frequent comment response concerning location of MHA affordable housing units.

Noah, Barbara-8

1. **Graphics in the aesthetics chapter do not accurately depict potential new structures.**

See comment response to Bricklin, David comment 6.

2. **Renderings of RSL structures should show flat roofs.**

See comment response to Cave, Donn-1.

3. **Assessment of impact on views and shading should be from specific views and specific affected areas.**

The Aesthetics visualizations in DEIS Exhibits 3.3-12 through 3.3-15 depict a continuum of potential redevelopment scenarios. These are supplemented by additional rendering and models in Exhibit F. The hypothetical scenarios depict a range of possible view and shadowing effects from representative viewpoints in public realm locations. While site specific depictions of specific views and shading impacts from locations in every part of the study area would provide more information on potential view and shading impacts, it is not possible to include renderings from every location within a study area of this scope for a programmatic EIS. It is also not possible to anticipate specific sites that would redevelop. As a programmatic EIS, representative potential examples are adequate and sufficient to characterize the nature and magnitude of view and shading impacts, which can be interpreted by a reader or decisionmaker for how the impacts would occur if brought to a specific location.

4. **Statement on DEIS page 1.23 citing variety of development regulation amendments is too vague.**

Please see also Appendix F for further information on specific development standards that are proposed to accompany MHA implementation.

5. **Analysis of urban form fails to account for neighborhood character.**

See frequent comment responses concerning individual urban village analysis. See also response to Bricklin, David comment 6.

6. **Graphics for a no action scenario should not depict new modern single family homes as potential infill development under existing regulations.**

Graphics for the No Action alternative in Section 3.3 Aesthetics depict a mix of smaller scale older single family structures and potential new single family structures built according to existing single family zoning regulations. It is reasonable to assume that some new single family structures would be built over a 20-year time horizon, and would be built according to existing zoning regulations.

- 7. Design review thresholds should be clearly stated, and discussion should account for recent changes to the design review program.**

DEIS Exhibit 3.3-6 stated design review thresholds for review. The FEIS includes updated information on design review thresholds reflecting recent action by the City Council to modify design review thresholds.

- 8. Specific public views should be identified that would be impacted.**

Discussion of views impacts is included in the aesthetics section, view obstruction and shading effects. Regulations protecting dedicated protected public views would be in place with or without the proposed action.

- 9. Design review should not be identified as mitigation in areas where most development would not be subject to design review.**

The FEIS includes updated discussion of design review thresholds to reflect recent action by City Council. In new design review regulations, special consideration is given in design review thresholds for areas being rezoned from single family to implement MHA. See also response to Bricklin, David comment 4.

Noah, Barbara-9

- 1. Mitigation measures in Open Space and Recreation section should be realistic and feasible.**

Please see additional discussion of mitigation measure in Section 3.7 Open Space and Recreation that is included in the FEIS. Measure that could be considered by decisionmakers to partially offset potential impacts are identified.

Noah, Barbara-10

- 1. Libraries should be assessed as one of the public services.**

Comment. Impacts to libraries was not identified in scoping. Impacts of incremental growth on library availability could occur, but significant constraints on library services were not identified during the EIS scoping process.

- 2. The EIS underestimates impact on Police service.**

See discussion of impacts. The Seattle Police Department reviewed the DEIS and agreed with the characterization of the impact.

- 3. Average response times are not an adequate measure of Police service.**

Comment noted. Average response times are an accepted level of service standard used for analysis in programmatic environmental reviews of this nature.

4. The EIS should account for the role of traffic congestion on fire department and EMS response times.

Traffic congestion is considered in Section 3.4 Transportation. Impacts of the action alternatives on traffic congestion and mitigation measures are identified.

5. The EIS should address failure of the Seattle Fire Department to maintain adequate fire fighter staff levels.

Comment noted.

6. Travel distance for emergency vehicles.

Comments noted.

7. Impacts on the 911 call center.

Comments noted. The EIS discusses service demands for fire and emergency medical services at a level appropriate for a programmatic level EIS of this nature.

8. and 9. The EIS should consider impacts on school capacity in more detail.

Comment noted. Please see frequent comment response concerning additional analysis of school capacity. Please see also response to Pollet, Gerry. The FEIS includes additional analysis of Seattle School District capacity in Section 3.8. Please see additional discussion of mitigation measure in this section related to school capacity.

10. The EIS should consider the effects of construction activity on sidewalks.

Comment noted. Existing regulations regarding sidewalk improvements at the time of construction would continue to be applied by the Seattle Department of Transportation.

11. Areas with sewers less than 12-inch diameter should be identified.

Comment noted. Please see frequent comment response concerning sanitary sewer infrastructure.

Noah, Barbara-11

1. Concern about greater potential land use impacts when development is concentrated in a local area.

Housing growth is estimated for a 20-year period, using the formally adopted 20-year growth estimates of the Comprehensive Plan as a baseline. Methodology accounts for broad market strength areas of the City in the assumptions for how fast or slow growth will occur due to additional development capacity in different urban villages. Please see the methodology discussion in Appendix G. It is not possible, in a programmatic EIS of this scale however to predict exactly where housing growth could occur more or less rapidly at a specific parcel level. The EIS acknowledges that land use impact would be greater than the generalized description of impact, in specific areas that

could see more concentrated development in a local area. Mitigation measures are identified to at least partially attenuate potential land use impact. Please also see discussion in Section 3.3 aesthetics where scenarios depicted both gradual and concentrated patterns of infill development in representative example local areas.

2. Mitigation strategies should be provided for existing single family areas that would be rezoned and could experience relatively greater land use impacts.

Several mitigation measures are provided, including integrated plan features that are intended to mitigate land use impacts in areas rezoned from single family. See expanded discussion of mitigation measures in the FEIS in the Section 3.2 Land Use and Section 3.3 Aesthetics. Integrated development standards particularly in the LR2, LR1 and RSL zones, are intended to mitigate land use and aesthetic impacts for areas that are rezoned from single family. See also descriptions of development standards at Appendix F.

The FEIS includes updated discussion of design review thresholds to reflect recent action by City Council. In new design review regulations, special consideration is given in design review thresholds for areas being rezoned from single family to implement MHA. See also response to Bricklin, David comment 4.

Noah, Barbara-12

1. Urban village specific impacts and mitigations were ignored.

Please see frequent comment response regarding individual urban village analysis. The comment reference several different elements of the environment. Please see discussion in the relevant sections of Chapter 3. With regard to public schools please see additional analysis in the FEIS of Seattle Public School capacity. Please also see expanded discussion in the FEIS of cultural displacement in Section 3.1 Housing and Socioeconomics.

Noah, Barbara-13

1. The EIS does not adequately address impacts on urban village residents.

Please see frequent comment response regarding individual urban village analysis. Please see discussion of impacts in various elements of the environment in Section 3. Please see discussion of direct, economic and cultural displacement in Section 3.1.

2. No alternatives were analyzed.

Please see frequent comment response concerning alternatives that could meet the objective.

Noah, Barbara-14

1. The DEIS did not address impacts of rising property taxes.

Comment noted. Please see additional discussion in the FEIS section 3.1.2 impacts, of impacts of property tax increases on homeowners.

2. Other funding alternatives aside from MHA were not explored.

Please see frequent comment response concerning alternatives that could meet the objective.

3. Delayed development of affordable housing using MHA-generated funds was not considered in the EIS.

Please see response to Fay, Frank-1, comment 2.

4. The DEIS did not evaluate impacts associated with potential loss of cultural institutions and local businesses.

Comment noted. Please see additional discussion of cultural displacement in the FEIS in the impacts subsection of section 3.1 Housing and Socioeconomics.

Noah, Barbara-15

1. The DEIS fails to address coordinated planning for infrastructure.

Comment noted. Please see frequent comment response concerning cumulative impacts. Please see analysis in Section 3.1-3.9.

2. No alternatives were considered in the event of a successful court challenge to MHA.

The EIS evaluates the potential environmental impacts of implementing MHA in the study area.

Noah, Barbara-16

1. No alternative was studied of re-purposing government land.

Comment noted. Please see frequent comment response concerning use of public property for affordable housing. Please see also frequent comment response concerning alternatives that could meet the objective.

2. No alternatives was considered that would spread the rezones outside of urban villages.

MHA implementation under the action alternatives include existing commercial and multi-family zoned lands outside of urban villages. See also frequent comment response concerning single family lands outside of urban villages.

3. No alternative was done for directing transportation dollars and financial resources to underdeveloped areas of the city.

Please see also frequent comment response concerning alternatives that could meet the objective. Please also note that MHA implementation under the action alternatives follows the planned Seattle 2035 growth strategy.

4. No alternative analysis was made for levying impact fees.

Please see mitigations measure discussion in the FEIS in Section 3.7 Open Space and Recreation, 3.4 Transportation, and 3.8 Public Services and Utilities.

5. No analysis was done of the compatibility of Alternative 1 with the Seattle 2035 Comprehensive Plan.

Alternative 1 is the Seattle 2035 growth estimates and adopted Comprehensive Plan FEIS analysis.

6. All alternatives assume the will grow based on the current high growth trend.

Comment noted. The growth estimates are based on the adopted county-wide planning estimates that are adopted in the Seattle 2035 Comprehensive Plan. See discussion in Appendix G for how growth estimates are modified to consider possible incremental growth under the action alternatives. It is possible that less growth could occur over the planning horizon, or the same amount of total growth would occur in action alternatives as under no action.

7. No alternative was made for gradual implementation of upzones.

Comment noted. Please see frequent comment response concerning alternatives that could meet the objective.

8. No statistics on maximum zoned density are provided.

Estimations of total development capacity (which is different from estimated growth) are provided for each alternative. It is unlikely that any urban village in the study area would become the “densest population areas in the world”.

9. No analysis of utilization of existing zoned capacity was provided.

See response to comment 8 above. Development projects in the pipeline are included in the growth estimates.

10. Alternative 3 does not conform to low to moderate density for residential urban villages.

Comment noted. See discussion of land use impacts in Section 3.2.

11. Alternative 2 does not allocate growth using a displacement / opportunity lens, but impacts are still analyzed in the same categories.

Comment noted. The intent of structuring the analysis in that way is to identify the different impacts that would occur based on the varied growth patterns.

12. There is no guarantee that new low-income housing would be built in high opportunity neighborhoods.

Please see frequent comment response concerning location of MHA affordable housing units. The EIS acknowledges that there is uncertainty for the exact location of units produced, and describes the assumptions that are employed.

Noah, Barbara-17

1. The aesthetic analysis is insufficient because it does not provide detailed study of each urban village.

Comment noted. Please see frequent comment response concerning individual urban village analysis.

2. Description of new single family homes that could replace older homes is not a baseline for analysis because many older small scale homes are still in place.

The image of the newer single family home depicts a single family home built under existing regulations. The increment of change due to the action alternatives is the degree of change between what could occur under existing regulations and proposed regulations.

3. Concerns about design review as mitigation.

Please see additional discussion in the FEIS of design review in Section 3.3, which reflects recently amendments to design review approved by City Council. This includes provisions to lower design review thresholds for any area converted from Single Family zoning through MHA implementation.

4. Potentially impacted views.

Existing view protections of public views will remain in effect.

5. Categorization of zoning changes and general description of land use and aesthetic impact are not sufficient.

For the programmatic EIS the categorization of zoning changes in the (M), (M1), and (M2) tiers provides for a system by which the magnitude of potential impacts can be summarized for analysis purposes.

Noah, Barbara-18

1. **Proposed mitigation measures will make the parking conditions worse.**

Please see the Frequent Comment Response – Parking Impacts and Mitigation document.

2. **The commenter states that parking conditions have likely worsened since the City's last parking study.**

The DEIS used the most recently available data at the time of analysis, in this case the City's 2016 parking occupancy study which is conducted annually.

3. **The City claims there will be no significant parking impacts which is inaccurate.**

The commenter states that the City identifies no significant parking impacts—this is not correct. On page 3.213, the DEIS states “With the increase in development expected under Alternatives 2 and 3, 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.”

The DEIS states that the impacts could be brought to a less-than-significant level if the City pursues a combination of expanded paid parking zones, revised RPZ permitting, more sophisticated parking availability metrics and continued expansion of non-auto travel options. Please see the Frequent Comment Response – Parking Impacts and Mitigation document for additional discussion.

4. **MHA creates a safety problem because people arriving home late will have to walk farther in the dark.**

It is not the City's policy to provide a public on-street parking space adjacent to every resident's home. The majority of single and multifamily homes in the City have private off-street parking. Walking to a destination from transit are a common aspect of living in an urban place and are not an inherent public safety hazard. Therefore, there is no impact identified for increasing the walking distance between available on-street parking and the final destination.

Noah, Barbara-19

1. **Mitigation measures in the Open Space and Recreation section are not adequate for the action alternatives.**

Comment noted. Please see revised discussion in the FEIS of mitigation measures for Open Space and Recreation.

Noah, Barbara-20

1. **Community engagement, and the focus group process, was not sufficient.**

Comment noted. Please frequent comment response concerning community engagement, and Appendix B summary of community input. The focus group process was one of many different community engagement channels.

Noah, Barbara-21

1. **MHA should not be implemented until an effective displacement prevention plan and an alternative affordable housing plan are offered up.**

Comment noted. MHA is one of numerous approaches being pursued to address displacement. Please see discussion of direct, economic and cultural displacement in Section 3.1 Housing and Socioeconomics. Please see also frequent comment response concerning alternatives that could meet the objective.

Noah, Barbara-22

1. **Concerns with the city's community engagement approach, and how it is marginalizing the influence of homeowners.**

Comment noted. Please see summary of community input at Appendix B.

Noah, Barbara-23

1. **Community input is not being listened to. There is substantial opposition by Wallingford residents to MHA implementation in single family zoned areas.**

Comment noted. Please see summary of community input at Appendix B. It is acknowledged that there have been a large number of comments received from Wallingford residents opposing MHA implementation in existing Single Family zoned areas. A diversity of community input has been received, including other comments from residents in Wallingford and other areas of the city in support of broad MHA implementation in urban villages.

2. **Wallingford has developed a shrunken up zone area map, which is sufficient to achieve the amount of units needed.**

Comment noted. The attached map, which proposes limit MHA implementation to parcels adjacent to Aurora Ave. N, and N. 45th St. is acknowledged. Please see MHA implementation principles at Appendix C. Please also see the Preferred Alternative map for the Wallingford Residential urban village at Appendix H.

Noble, Judith and Tom

1. Commenter recommends an alternative that considers impact fees to meet objective

The proposal is aimed at providing additional affordable housing so the City intends to pursue mitigation measures that will alleviate impacts while still achieving the goal of improved housing affordability. Nothing in this proposal impedes the ability of the City to pursue implementation of an impact fee program.

Please also see frequent comment response concerning *Alternatives to MHA that could achieve objectives*.

2. Images shown in aesthetics section do not show side-by-side comparison

See comment response to Bricklin, David comment 6.

3. Concern about parking

Please see frequent comment response concerning *Impacts to parking*.

4. Concern about urban forest, tree canopy, stormwater benefits of conifers, coniferous tree canopy on single family zoned land, in adequate tree canopy analysis

Please see frequent comment response concerning *Impacts to Stormwater Infrastructure*. Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*. Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle's single family zoned land.

Noble, Thomas

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Nolan, Trenton

1. The comment document requests completion of an EIS pertaining to just the South Park neighborhood. The comment document notes that South Park has serious environmental issues, and expresses concern about notice and public engagement.

Comments noted. Thank you for your comment. Please see frequent comment responses concerning individual urban village review and community engagement. Please see also Appendix B. Please see the Preferred Alternative map at Appendix H for South Park. In

recognition of constraints in South Park, the minimum zoning changes necessary to implement MHA are proposed for the South Park area. This approach is consistent with the approach proposed for areas outside of urban villages under the action alternatives.

Nonneman, Elaine

1. Supports comments and conclusions of the Madison Miller Park Community Group.

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Nonneman, Elaine-2

1. Commenter supports Madison-Miller Park Community Group EIS comment

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

2. Commenter supports No Action Alternative, supports ADU/DADUs, impact fees, and concern that amount of affordable housing in proposal is insufficient

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

3. Commenter disagrees with displacement risk typology for Madison-Miller

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

4. Concern about public input process

See Frequent Comment Response *Community Engagement*.

5. Concern about location of affordable housing

Please see frequent comment response concerning *MHA affordable housing requirements* and *Location of MHA housing units*. Note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA

payment dollars to fund acquisition and rehabilitation of existing housing stock.

6. Concern about impacts to character and transitions, parking, light

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

7. Concern about solar panels being obstructed

Please refer to additional discussion in the impacts subsection of FEIS Section 3.3 Land Use regarding the impacts of possible shading of existing solar panels.

8. Commenter disagrees with access to opportunity in terms of transit for Madison-Miller urban village

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

9. Concern about parking and pedestrian and cyclist safety

Comment noted. Please see Section 3.4 Transportation, which includes analysis of pedestrian and bicycle network, safety, and mode share. Modifications to the existing RPZ program are discussed as potential mitigation for parking impacts.

10. Concern about impacts to historic housing stock in Madison-Miller urban village

The Draft EIS proposes mitigation measures that would reduce potential impacts to historic and cultural resources. The proposed measures include establishing new policies regarding evaluation of potential impacts to historic and cultural resources at the project-level. As a Programmatic EIS, project-level issues regarding specific resources are not evaluated.

11. Concern about air quality, tree canopy, setbacks, street tree maintenance, sewer lines, wildlife habitat

The EIS describes that some aesthetic impacts could occur in Madison Miller, particular in areas where (M1) and (M2) capacity increases are proposed. Mitigation measures are included in the proposal to offset potential impacts of new development, specifically building setbacks, façade treatments, and building envelope modulation to reduce visual bulk. While not legally binding, the EIS also includes recommended mitigation measures to further reduce potential impacts, including new design guidelines, modifications to the thresholds for the Design Review process, and new requirements for protecting views and preventing adverse shading effects.

Please also see frequent comment responses concerning *Impacts on tree canopy*, *Impacts to sanitary sewer systems*, and *Impacts to Stormwater Infrastructure*.

Regarding street tree maintenance, please see the [SDOT Street Tree Manual](#) for information about street tree maintenance responsibility.

Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures.

Please see EIS Chapter 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures.

12. Concern about open space definition for Madison-Miller urban village

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

13. Concern about stormwater, sanitary sewers, roads, power lines, and narrow streets.

Please see comment responses above concerning stormwater and sanitary sewer systems.

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

Seattle has long had narrow streets with on-street parking served by a variety of infrastructure systems. The DEIS includes information on potential impacts to electrical utility in Section 3.8. Since the DEIS, Seattle City Light provided additional information about potential impacts, and additional discussion is included in the FEIS section 3.8.

14. Concern about transit and continuing car ownership

Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures, including potential for bike share memberships. Note that bike share programs are newly available in Seattle at the time of writing this response. Please also see frequent comment response concerning *Impacts to parking*.

Nourish, Bruce

1. In favor of greatest zoning density possible through the MHA implementation process.

Thank you for your comment. Comment noted. See description of the Preferred Alternative in FEIS Chapter 2.

2. Concern that MHA requirements may make development infeasible.

Thank you for your comment. Please see response to Bertolet, Dan.

Novak, Terry

1. Request for NC2P-75 zoning on all 4 real estate parcels underlying Photographic Center Northwest building

Please see the Preferred Alternative map for the First Hill-Capitol Urban Center in Appendix H. Under the Preferred Alternative the site would have NCP-75 (M1) zoning.

O'Brien, Cindy

1. Supports comments and conclusions of the Madison Miller Park Community Group.

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Oei, Holy

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Okuno, Erin

1. Concern that number of affordable units in the plan is too low

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that MHA is a new program aimed at addressing housing affordability both through requirements for affordable housing with development and increasing supply overall.

Please also see EIS Chapter 3.1 Housing and Socioeconomics including mitigation measures which identifies additional strategies for addressing the housing affordability crisis. Please also see the frequent comment response concerning *MHA affordable housing requirements*.

2. Concern about gentrification, displacement of people of color and businesses, and lower income families

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement as well as correlations between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

3. Concern about parking, especially for families with special needs

Please see frequent comment response concerning *Impacts to parking*. Concerning accessible parking, if there are no parking spaces provided in new development, then no accessible parking is required. Whenever parking is provided the building code requires a certain percentage of those provided spaces be accessible spaces. Please see Seattle Building Code Section 1106.

O'Leary, Dennis

1. Supports comments and conclusions of the Madison Miller Park Community Group.

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

2. Impacts to sanitary sewer systems should be paid by developers.

Please see frequent comment response concerning sanitary sewer services.

O'Leary, Roberta

1. Supports comments and conclusions of the Madison Miller Park Community Group.

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Olins, Alexandra

1. Not enough focus on mitigation of transportation impacts.

Please see discussion of mitigation measure in Section 3.4 Transportation.

2. On street parking is becoming hard to find in West Seattle.

Please see discussion of impacts and mitigation measures for on street parking in Section 3.4 Transportation.

3. Where plans to build additional schools?

Please see expanded discussion in the FEIS concerning impacts to public schools and additional coordination with Seattle Public Schools (SPS). Please see also frequent comment response concerning coordinated planning with SPS.

4. MHA implementation underestimates impacts on neighborhood character.

Please see discussion of impacts in Section 3.3 Aesthetics. The reason that affordable housing has not been included in new developments in the Morgan Junction area to date is that there is not currently an affordable housing requirement in the area. Implementation of MHA would require new development in the Morgan Junction area to contribute to affordable housing.

Olivas, Alizah

1. The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

Olson, John

1. Supports comments and conclusions of the Madison Miller Park Community Group.

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

2. MHA requirement amounts should be increased.

Please see frequent comment response regarding MHA affordable housing requirements.

Olson, Leanne

1. Concern about location of affordable housing

Please see frequent comment response concerning *MHA affordable housing requirements* and *Location of MHA housing units*. Note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses Levy and MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

2. Concern about loss of lower cost historic housing stock

Please see comment response above.

3. City should incentivize development in other areas that are “less desirable”

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix C MHA Implementation Principles, which include “Ensure MHA program creates affordable housing opportunities throughout the city” and “Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.”

Locating more housing near transit and amenity-rich areas helps meet goals for reducing car trips and increasing transit use, which support climate mitigation, equity, and livability goals.

4. Interest in preserving existing single family homes and allowing conversion to multifamily, ADU/DADUs

Please see frequent comment response concerning Single family zones not in the study area. Note that the City is currently considering policy to remove barriers to accessory dwelling units, including “backyard cottages.”

Osaki, Maryanne

1. Concern about lack of sidewalks and flooding in Crown Hill

Please also see frequent comment response concerning *Impacts to Stormwater Infrastructure*. Also note that new development inside urban villages requires sidewalks in many cases. Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as Relevant Plans and Policies, which includes “New sidewalks, particularly near schools” as part of the City of Seattle 2017–2022 Transportation Capital Improvement Program.

2. Concern about emergency vehicle access to 20th Ave NW in Crown Hill

Regarding emergency vehicle access, Seattle has long had narrow streets with on-street parking served by emergency vehicles. SDOT works closely with the Fire Department to maintain access to properties throughout the city. The Fire Department had the opportunity to comment on this EIS and had no comments on emergency vehicle access impacts related to the proposed legislative action.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives and Appendix H Zoning Maps. Note that 20th Ave NW is not included in the Crown Hill Urban Village expansion area as part of the preferred alternative.

Parker, Bruce

1. Commenter supports the No Action Alternative

Thank you for your comment. Your comment is noted. Please see FEIS Chapter 2.0 Description of the Proposal and Alternatives, which

includes description of the preferred alternative and methodology for proposed zone changes.

2. Concern about impacts to low income populations

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

Please also see EIS Chapter 3.1 Housing and Socioeconomics as well as the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses payment dollars to fund acquisition and rehabilitation of existing housing.

3. Concern about small businesses

Comment noted. Please see the Office of Economic Development work on Commercial Affordability, which includes small businesses. <http://www.seattle.gov/economicdevelopment/about-us/our-work/commercial-affordability>

4. Concern that MHA payment requirements increase the cost of housing and displacement

Please see response to comment #2 above.

5. Commenter recommends alternatives to proposal including easing land use restrictions and incentive zoning

Please frequent comment response concerning *Alternatives to MHA that could achieve objectives*.

6. Single family areas should be protected to preserve character, concern about homeownership, interest in ADU/DADU as a solution

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures. Please see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle's single family zoned land.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, many of which include family-size units such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas allows for more family-size and family-style housing as well as potential for more ownership options in areas that are currently zoned single family.

Please see frequent comment response concerning Single family zones not in the study area. Note that the City is currently considering policy to remove barriers to accessory dwelling units, including “backyard cottages.”

7. Concern about size of new single-family homes, recommends cottage housing, concern for seniors and children, recommends FAR limits and allowing division of land

Please see comment responses above. Also note that the Residential Small Lot (RSL) zone includes development standards limiting FAR, and includes a cottage housing typology. Please see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study which includes information on density limits for the proposed RSL zone.

8. Concern about funding for schools and disparity in resources across the city

Please see frequent comment response concerning *Impacts to Seattle Public School capacity*.

Parks, Kristan

1. Requesting NC2P-75 zoning for all 4 parcels that comprise PCNW, so that if we able to develop our site, we can dedicate 10% the residential component to affordable housing.

Thank you for your comment. Your comment is noted. Please see Chapter 2.0 Description of the Proposal and Alternatives, which includes the preferred alternative, and Appendix H. The preferred alternative includes the requested zone change.

Parrish, Rebecca

1. The comment document requests completion of an EIS pertaining to just the South Park neighborhood. The comment document notes that South Park has serious environmental issues, and expresses concern about notice and public engagement.

Comments noted. Thank you for your comment. Please see frequent comment responses concerning individual urban village review and community engagement. Please see also Appendix B. Please see the Preferred Alternative map at Appendix H for South Park. In recognition of constraints in South Park, the minimum zoning changes necessary to implement MHA are proposed for the South Park area. This approach is consistent with the approach proposed for areas outside of urban villages under the action alternatives.

Perce, Celeste

- 1. The comment document requests completion of an EIS pertaining to just the South Park neighborhood. The comment document notes that South Park has serious environmental issues, and expresses concern about notice and public engagement.**

Comments noted. Thank you for your comment. Please see frequent comment responses concerning individual urban village review and community engagement. Please see also Appendix B. Please see the Preferred Alternative map at Appendix H for South Park. In recognition of constraints in South Park, the minimum zoning changes necessary to implement MHA are proposed for the South Park area. This approach is consistent with the approach proposed for areas outside of urban villages under the action alternatives.

Pasciuto, Giulia

- 1. Inadequate racial equity analysis**

The FEIS substantially expands the Housing and Socioeconomics Section 3.1 to more directly analyze and address potential impacts on racial and cultural minority populations, and the displacement analysis is expanded to more fully analyze cultural displacement. Please refer to Section 3.1 of the Final EIS, and the frequent comment response concerning impacts on racial and cultural minority groups.

- 2. Inadequate analysis**

As the comment acknowledges, the EIS displacement analysis does identify that rising rents could result in some amount of economic displacement under all alternatives including No Action. The comment states that land values will go up due to MHA implementation, because a greater amount of housing could be built on the same amount of land. However, a required affordable housing contribution is accompanied with the development capacity increase, which adds to the cost of development. See frequent comment response concerning MHA affordable housing requirements. The economic effects of the MHA affordable housing requirement and additional development capacity are complex, and data to conclude that the proposed requirement will increase land values is not available. An economic feasibility analysis commissioned by the city studied project feasibility both with and without MHA requirements and found that MHA payment/performance requirements generally did not change the feasibility of development; e.g., in most cases, projects that were infeasible with MHA requirements were also infeasible without MHA requirements. See also comment response 2 to Bertolet, Dan.

In view of the general scope of a programmatic EIS, and limitations on site-specific and financial analysis specified in the SEPA Rules, the expanded analysis in the Final EIS is believed to provide an appropriate level of detail for this discussion. As noted in the response to 1 above, the FEIS includes greater depth of discussion on the combined effects of physical, economic, and cultural

displacement that focuses on racial and ethnic minority populations. Additional mitigation measures centered on community stabilization strategies are included in the FEIS in Section 3.1 Housing and Socioeconomics.

3. Create more alternatives

The Final EIS contains an additional Preferred Alternative that is responsive to comments received on the Draft EIS and to the additional analysis that has been performed. Please refer to the description of the Preferred Alternative in Chapter 2 of this document.

Peters, Brooks-1

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Peters, Brooks-2

1. Concerns that infrastructure is not in place in West Seattle.

Thank you for your comments. Comments noted.

Peters, Brooks-3

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Peters, Kay

1. MHA affordable housing requirement should require housing to be built on site. Concern about loss of diversity in neighborhoods.

Please see frequent comment response concerning location of MHA affordable housing. Please also see discussion of demographics and direct, economic, and cultural displacement in Section 3.1 Housing and Socioeconomics.

Peterson, Kyle

1. **Concern that implementing MHA by applying the LR2 zone in Madison-Miller will radically change the character of the neighborhood.**

Please see Section 3.3 Aesthetics. Please also see the Preferred Alternative map for the Madison-Miller urban village at Appendix H. Fewer areas of LR2 zoning are proposed compared to Alternative 3.

2. **Supports comments and conclusions of the Madison Miller Park Community Group.**

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Peterson, Shawn

1. **Why would you increase zoning on a designated greenway street? It seems contradictory.**

The purpose for changing zoning is to implement Mandatory Housing Affordability (MHA) to require that new development contributes to affordable housing. See Appendix C MHA Implementation Principles. Locations near community assets and infrastructure such as parks, schools and greenways are considered good locations for additional housing because more new residents could access the infrastructure and amenities.

2. **Increasing zoning would result in dramatic changes to the character of the Madison Miller neighborhood.**

Please see Section 3.3 Aesthetics. Please also see the Preferred Alternative map for the Madison-Miller urban village at Appendix H. Fewer areas of LR2 zoning are proposed compared to Alternative 3.

3. **Supports comments and conclusions of the Madison Miller Park Community Group.**

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Pihl, Erik

1. **Concern about the community participation process.**

Comments noted. Please see Appendix B, Summary of Community input.

2. **Open space is limited in the Fremont urban village.**

Please see Section 3.7 Open Space and Recreation, including discussion of mitigation measures for potential impacts to the availability of parks.

3. Concerns about pedestrian and cyclist safety in Fremont.

Please see Section 3.4 Transportation.

4. Concerns that buses through Fremont have insufficient room for riders.

Comment noted. Please see Section 3.4 Transportation, which includes metrics about the existing transit crowding ratio. Routes through Fremont including route 40 and the Rapid Ride E line have some of the higher existing transit crowding ratios of routes analyzed. (DEIS Exhibit 3.4-26) Please see discussion of impacts from alternative in Section 3.4 Transportation.

5. Concerns about on street parking constraints due to new development.

Comment noted. Please see Section 3.4 Transportation, including discussion of potential modifications to the RPZ program as mitigation of impact.

6. Concerns that new housing will not be affordable.

Please see Section 3.1 Housing and Socioeconomics. Implementation of MHA through any of the action alternatives would require that new development contributes towards rent an income restricted affordable housing. There is currently no such requirement in Fremont. In Section 3.1 please see discussion of direct, economic and cultural displacement impacts.

7. Each neighborhood is unique and planning for MHA implementation must be done for neighborhoods individually.

Please see frequent comment response concerning individual urban village evaluation.

8. MHA affordable housing units should be located in the neighborhoods from which the funds are derived.

Please see frequent comment response concerning location of MHA affordable housing units.

Pittenger, Glenn

1. Far more single family land should be rezoned to make a meaningful impact to housing supply.

Comments noted. Thank you for sharing your work and methodology. Please see frequent comment response concerning single family zones outside the study area.

2. Require sidewalks in every urban village and expansion area.

Comment noted. Sidewalks are required in urban villages and centers for new multifamily and commercial development, and in general for single family development except when no sidewalk exists within 100 feet of a single family home site.

3. **Even if MHA is implemented only on the existing single family lands within urban villages, minimum lot size should be reduced in all single family areas.**

Comment noted. Please see frequent comment response concerning single family zones outside the study area.

Plomp, Marjolijn

1. **Concern about lack of parking requirements**

Please see frequent comment response concerning *Impacts to parking*.

2. **Concern about safety hazards on narrow streets, limiting fire and police access**

Regarding emergency vehicle access, Seattle has long had narrow streets with on-street parking served by emergency vehicles. SDOT works closely with the Fire Department to maintain access to properties throughout the city. The Fire Department had the opportunity to comment on this EIS and had no comments on emergency vehicle access impacts related to the proposed legislative action.

3. **Transit is insufficient**

Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as Relevant Plans and Policies.

Pollet, Gerry

1. **Urges the city to consider school capacity in attached comments.**

Thank you for taking the time to comment on the DEIS, and for your attention to this topic. Responses to specific comments are below. See also frequent comment response regarding school capacity.

2. **The DEIS fails to consider lack of school capacity.**

Please see additional analysis in the FEIS in Section 3.8 concerning school capacity constraints. Since the DEIS, the City and Seattle Public Schools (SPS) held additional discussion and coordination related to school enrollment and school capacity. Data provided by SPS are used in the FEIS to estimate an enrollment to capacity ratio for each school service area. Data from SPS are included in a new Appendix N. SPS data are used to identify student generation ratios from net new housing. In the impacts section, potential additional students from incremental growth that could occur due to implementation of the Preferred Alternative is estimated. The FEIS also includes additional discussion of mitigation measures for potential impacts to public schools.

3. Physical access to higher educational, as part of the access to opportunity index, should not be used to justify zoning capacity increases.

Fourteen criteria are used in the access to opportunity index for urban villages. School performance based on elementary and middle school test scores, high school graduation rates, and access to a college or university are education-related criteria in the index. High performing schools and access to higher education in an area of the city are among the factors considered in identifying the geographic locations that provide high access to opportunity for residents.

Alternatives in the EIS including the Preferred Alternative feature an approach that would direct relatively more new housing to high opportunity areas. The intent is to allow a greater number of residents, including low-income and racial and ethnic minority residents to benefit from living within a high opportunity area.

As seen in additional analysis of school capacity described in the FEIS, it is true that some high opportunity urban villages also have school service areas that are at or near to capacity. As described in FEIS Section 3.8 It is expected that SPS would continue to employ current and new practices to increase physical capacity at existing schools and continue to open new schools in capacity constrained school service areas. The FEIS includes additional discussion of mitigation measures for school capacity constraints.

4. The EIS should include commitments to providing extra physical space and wrap around services for students, to increase school capacity. The City should work with SPS to provide public lands for new schools.

The FEIS includes additional discussion of mitigation measures that could be employed to address school capacity constraints. One of the additional potential mitigation measures is the exploration of impact fees for schools. Discussion of mitigation measures also includes existing and potential partnership between the City and SPS to procure lands for location of school facilities. The FEIS Exhibit 3.8-7 estimates net students estimated to be generated in school service areas from the Preferred Alternative. For the purposes of the EIS, the focus of analysis is the impact of additional net students stemming from MHA implementation.

Prasad, Veena

1. The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

Pratt, CW

1. Concern for preserving existing neighborhoods

Please see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study. Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures.

2. Interest in more affordable housing near transit and mixed-income options

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix C MHA Implementation Principles, which include “Ensure MHA program creates affordable housing opportunities throughout the city” and “Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.”

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

3. Concern about community engagement

Please see frequent comment response concerning *Community engagement*.

4. Concern about existing urban village plans, including parts of Roosevelt, concern for sub-standard housing and small business

This is a programmatic DEIS addressing area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects required are also unknown. Individual development projects will undergo separate and more detailed SEPA review, and specific mitigation will be determined at that time.

Please see EIS Chapter 3.1 Housing and Socioeconomics as well as p. 61 of the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses and reports on MHA payment dollars used to fund acquisition and rehabilitation of existing housing.

Comment noted. Please see the Office of Economic Development work on Commercial Affordability, which includes small businesses. <http://www.seattle.gov/economicdevelopment/about-us/our-work/commercial-affordability>

5. Concern about zone changes in single-family areas and aesthetic impacts, impacts to families, and affordability

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures.

Please see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle's single family zoned land.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, many of which include family-size units such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas allows for more family-size and family-style housing in areas that are currently zoned single family.

Note also that the proposal includes family-size unit requirements for both market rate and affordable housing performance. Also note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

6. Concern about community engagement and trees, architecture

Please see frequent comment responses concerning *Community engagement* and *Impacts on tree canopy*.

Please see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study. Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures.

7. Concern about unique conditions, economic diversity

Please also see EIS Appendix C MHA Implementation Principles, which include "Unique Conditions: Consider location-specific factors." Please also see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

8. Request to study impacts specific to urban villages

Please see frequent comment response concerning *Individual urban village review*.

9. Concern for location of new affordable housing

Please see frequent comment response concerning *MHA affordable housing requirements* and *Location of MHA housing units*.

Presser, Brian

1. The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

Prociv, Patrick

1. Concern about impacts to current neighborhood residents

Each chapter of the EIS discusses potential impacts within the EIS scope. The proposal is aimed at providing additional affordable housing so the City intends to pursue mitigation measures that will alleviate impacts while still achieving the goal of improved housing affordability. Please see frequent comment response concerning *MHA affordable housing requirements*.

2. Concern for low income residents

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

3. Concern about property taxes

Please see frequent comment response concerning *Property taxes*.

4. Concern about street-level commercial vacancies in new development and small businesses

Comment noted. Please see the Office of Economic Development work on Commercial Affordability, which includes small businesses. <http://www.seattle.gov/economicdevelopment/about-us/our-work/commercial-affordability>

5. Concern about affordable units not being affordable to those who need them

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses

concerning *MHA affordable housing requirements, Impacts on racial and cultural minority groups, and Displacement analysis.*

Please see EIS Chapter 3.1 Housing and Socioeconomics as well as the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses payment dollars to fund acquisition and rehabilitation of existing housing.

6. Concern about low-income renters

Please see response to comment #5 above.

7. Concern about parking and street congestion

Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures and frequent comment response concerning *Impacts to parking.*

8. Concern about privacy for single family homes

Please see comment response to Bricklin, David, #7.

9. Concern about litter and street damage

Please see EIS Chapter 3.8 Public Services and Utilities for discussion of impacts and mitigation measures.

10. Concern about development impacts to neighborhood residents

Please see response to comment #1 above.

Proteau, Dwight

1. Concern about Crown Hill urban village expansion to 20th Ave NW and parking

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives and Appendix H Zoning Maps. The preferred alternative does not include an expansion to 20th Ave NW.

Please also see frequent comment response concerning *Impacts to parking.*

2. Concern about safety along 20th Ave NW, no room for sidewalks

Please see response to comment #1 above.

3. Concern about lack of fire hydrant along 20th Ave NW, and access for emergency vehicles is challenged

Please see response to comment #1 above.

Regarding emergency vehicle access, Seattle has long had narrow streets with on-street parking served by emergency vehicles. SDOT works closely with the Fire Department to maintain access to properties throughout the city. The Fire Department had the opportunity to comment on this EIS and had no comments on emergency vehicle access impacts related to the proposed legislative action.

Provost, Nicole-1

1. EIS should address urban villages individually.

Please see frequent comment response concerning Individual Urban Village Review.

2. The EIS does not adequately address the city as a whole.

Please see frequent comment response concerning Citywide Impacts to the City as a Whole.

Provost, Nicole-2

1. Urban villages were not studied individually.

Please see frequent comment response concerning Individual Urban Village Review.

Provost, Nicole-3

1. Individual urban villages mitigations are not provided for the specific impacts in urban villages.

Please see frequent comment response concerning Individual Urban Village Review.

Provost, Nicole-4

1. Impacts on families with school-age children were not addressed.

Please see Section 3.1 housing and socioeconomics which discusses potential impact of the alternative on various populations, and housing characteristics of the proposal. Please also see frequent comment responses concerning family-friendly housing.

Provost, Nicole-5

1. The DEIS does not adequately address negative impacts on urban village residents, institutions, and environments.

Please see frequent comment responses concerning individual urban village review. Please see discussion in Section 3.1 of direct, economic and cultural displacement. Please see section 3.2 – 3.8 for discussion of a range of potential environmental impacts including noise and pollution.

Provost, Nicole-6

1. No alternatives were studied.

Please see frequent comment responses concerning alternatives that could reach the objective.

Provost, Nicole-7

1. The DEIS did not address the impacts of property tax increases.

Comment noted. Please see additional discussion in the FEIS section 3.1.2 impacts, of impacts of property tax increases on homeowners.

Provost, Nicole-8

1. The EIS does not study funding alternative options to MHA.

Comment noted. Please see frequent comment response concerning alternatives that could achieve the objective.

Provost, Nicole-9

1. The impact of displacement and delayed development of affordable housing was not addressed.

Comment noted. Please see discussion of direct, economic and cultural displacement in Section 3.1 Housing and Socioeconomics. Please also see response to Fay, Frank-1.

Provost, Nicole-10

1. Displacement impacts of businesses and cultural institutions specific to urban villages were not addressed.

Comment noted. Please see additional discussion in the FEIS of cultural displacement. Please also see Section 3.5 Historic Resources. Please see also frequent comment response concerning individual urban village review.

Provost, Nicole-11

1. Spill-over effects onto adjacent communities were not analyzed.

Please see frequent comment response concerning cumulative impacts.

Provost, Nicole-12

1. The links between commercial development and housing demand were not assessed.

Please see discussion of commercial development on FEIS page 3.60. The amount of commercial growth as well as residential growth is estimated and considered for each of the alternatives. MHA requirements apply to commercial and residential development. Estimated quantities of MHA affordable housing units for each action alternative include proceeds from MHA requirements for commercial development.

Provost, Nicole-13

1. **The DEIS fails to address integrated planning and concurrent infrastructure investments.**

Please see sections, 3.4 – 3.8. The programmatic EIS adopts the environmental analysis from the Seattle 2035 Comprehensive Plan as the basis for the No Action alternative. Action alternatives are evaluated in comparison to the city's adopted comprehensive plan growth strategy over a 20-year planning horizon.

Provost, Nicole-14

1. **No alternatives were considered in the event of a successful challenge to MHA.**

Comment noted. The EIS studies the potential environmental impacts of MHA implementation.

Provost, Nicole-15

1. **No alternative funding sources for infrastructure were considered.**

Please see mitigation measures discussion in sections 3.4, 3.6, 3.7, and 3.8. Additional discussion of potential mitigation measures includes impact fees.

Provost, Nicole-16

1. **Alternative sources of property for affordable housing were not considered.**

Please see frequent comment response concerning use of public lands for affordable housing.

Provost, Nicole-17

1. **Graphical representations for the aesthetics section are inadequate.**

Comment noted. Please see response to Bricklin, David, comment 6.

Provost, Nicole-18

1. **The DEIS does not provide adequate specifics with regard to impacts on aesthetics.**

Comment noted. Please see response to Bricklin, David, comment 6. Please see response to Noah, Barbara-8 comment 3.

Provost, Nicole-19

1. **The DEIS does not adequately describe design review as a mitigation.**

DEIS Exhibit 3.3-6 stated design review thresholds for review. The FEIS includes updated information on design review thresholds reflecting recent action by the City Council to modify design review thresholds. In new design review regulations, special consideration is given in design review thresholds for areas being rezoned from single family to implement MHA. See also response to Bricklin, David comment 4.

Provost, Nicole-20

1. **DEIS descriptions of parking impacts and mitigations are inadequate.**

Please see frequent comment response concerning on street parking impacts and mitigations.

Provost, Nicole-21

1. **DEIS fails to adequately describe impacts on tree canopy.**

Please see frequent comment response concerning impacts to tree canopy. Please see also comment response to Early, Tom.

Provost, Nicole-22

1. **DEIS fails to identify risks and potential mitigations to Parks and Open Space impacts.**

Please see additional discussion of mitigation measure in Section 3.7 Open Space and Recreation that is included in the FEIS. Measure that could be considered by decisionmakers to partially offset potential impacts are identified.

Provost, Nicole-23

1. **DEIS fails to adequately analyze the need for concurrent sewer systems upgrades.**

Please see frequent comment response concerning sanitary sewer service.

Provost, Nicole-24

1. **Community engagement efforts cited in the DEIS appendix were inadequate and one-sided.**

Comment noted. Please see also frequent comment response concerning community engagement.

Provost, Nicole-25

1. **The displacement risk / access to opportunity matrix is unsubstantiated and not justified, and shouldn't be the basis for evaluating zoning changes.**

Comment noted. Please see frequent comment response concerning the displacement risk / access to opportunity typology.

Provost, Nicole-25

1. **The DEIS does not adequately assess air quality risks from construction activity.**

Comment noted. Please see response to Bates, Tawny-2 comments 3,13,14,15.

Pullen, Jonathan

1. **Concern about additional density in the block of Wallingford Ave. N. between 103rd and 105th in the Northgate urban village.**

Thank you for your comment. Additional language is added in the FEIS Section 3.2 Land Use in the impacts section for the Northgate urban village discussing potential land use impact on the block. Please see the Preferred Alternative, which would include MHA implementation with the Residential Small Lot zone designation, which would provide a transition at the edge of the urban village, and includes height limits and development standards more similar to the existing single family land use, than Alternative 2 for the block discussed in the comment.

2. **Concern about additional impacts on traffic, parking and stormwater infrastructure due to increased potential for housing in the block of Wallingford Ave. N. between 103rd and 105th in the Northgate urban village.**

Comments noted. Please see EIS section 3.8 concerning public services and utilities including stormwater. Please see EIS section 3.4 for a discussion of parking and traffic impacts.

Quaintance, Alice

1. **Commenter supports access to opportunity and displacement risk typology used in Alternative 3**

Thank you for your comment. Comment noted. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

2. **Concern about displacement, interest in focusing new affordable units in high opportunity areas**

Thank you for your comment. Comment noted. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which

includes description of the preferred alternative and methodology for proposed zone changes.

3. Prefers alternative 3 for Madison-Miller, with specific preference for LR1 along 21st & 22nd, citing compatibility

Thank you for your comment. Comment noted. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix H Zoning Maps.

The area discussed by commenter is proposed for Residential Small Lot (RSL) zoning in the preferred alternative.

4. Concern about tree requirements

Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*. Please see incorporated plan features that include updates to Green Factor landscaping requirements for development and new RSL tree requirements.

Quetin, Gregory

1. Interest in further increasing housing overall and affordable housing

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that MHA is a new program aimed at addressing housing affordability both through requirements for affordable housing with development and increasing supply overall.

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes discussion of additional measures considered and underway to address housing affordability in Seattle.

2. Concern about displacement and interest in investing in areas at high risk of displacement

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

3. Interest in neighborhoods having strong control over style of neighborhood

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures.

4. Concern for tree canopy

Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

5. Interest in density near parks

Please see EIS Appendix C MHA Implementation Principles, which include “Ensure MHA program creates affordable housing opportunities throughout the city” and “Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.”

6. Concern about air quality and greenhouse gas emissions

Please see EIS Chapter 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures.

R, Randy**1. Concern the plan is too rushed, concern for character and livability**

Please see frequent comment response concerning *Community engagement*. Please also see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please see EIS Appendix C MHA Implementation Principles, which include “Ensure MHA program creates affordable housing opportunities throughout the city” and “Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.” Locating more housing near transit and amenity-rich areas helps meet goals for reducing car trips and increasing transit use, which support climate mitigation, equity, and livability goals.

2. Concern about affordability of new homes for sale

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle’s single family zoned land.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, many of which include family-size units such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas allows for more family-size and family-style housing in areas that are currently zoned single family.

3. Concern about concentrating demographics in specific areas of the city

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS

Appendix C MHA Implementation Principles, which include “Ensure MHA program creates affordable housing opportunities throughout the city” and “Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.”

Locating more housing near transit and amenity-rich areas helps meet goals for reducing car trips and increasing transit use, which support climate mitigation, equity, and livability goals.

Please also see EIS Chapter 3.1 Housing and Socioeconomics as well as the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses and reports on MHA payment dollars used to fund acquisition and rehabilitation of existing housing.

4. Interest in prioritizing housing in vacant areas first

Please see comment responses above.

5. Concern about materials and aesthetics of new construction

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures. Please also see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

6. Concern about loss of historic structures, interest in preservation

Please see EIS Chapter 3.5 Historic Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Analysis of historic resources*.

Please also see EIS Chapter 3.1 Housing and Socioeconomics as well as the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses and reports on MHA payment dollars used to fund acquisition and rehabilitation of existing housing.

Raaen, Lee and Berner, Miranda (Wallingford Community Council)

1. The DEIS does not meet SEPA requirements for the consideration of alternatives.

See Frequent Comment Response *Alternatives to MHA that could achieve objectives*.

2. The MHA-R framework did not undergo environmental review. The MHA-R framework should be a part of the current DEIS or subject to separate SEPA review.

The city issued a Determination of Non-Significance in June of 2015 for legislation that would require new development, including residential and commercial development, to provide affordable housing in proportion to the gross floor area of their project. This prior SEPA analysis covered various affordable housing program

aspects such as the Area Median Income (AMI) levels that would be served. This legislation did not include any changes to development capacity or zoning standards in any area of the city.

The Council adopted, and the Mayor signed, the MHA-R framework ordinance, in August of 2016. The framework ordinance did not include any changes to development capacity or zoning standards nor any specific performance/payment requirements. No timely SEPA challenge to the framework ordinance was filed.

The proposed action in this EIS includes modifying development standards in the land use code for the study area, to provide additional development capacity, make area wide zoning map changes, expand the boundaries of certain urban village on the Comprehensive Plan's Future Land Use Map, and several other elements. (See Section 2.1). The potential impacts of these changes are analyzed for the action alternatives. The proposed action in the EIS also includes adopting requirements under Chapters 23.58B and 23.58C for development meeting certain thresholds within the study area either to build affordable housing on-site or to make a payment to support the development of rent- and income-restricted housing. Chapter 2.0 of the EIS describes the proposed MHA requirements including the specific proposed affordable housing payment and performance requirements for residential and commercial development. The affordable housing quantities that would be generated are estimated and referenced throughout the EIS. The MHA affordable housing requirements as they would apply in the study area are a part of the proposed action that is evaluated in the EIS.

Rainier Beach Action Coalition

1. **The EIS does not include an alternative where most of the growth would be applied to areas with high displacement risk and low access to opportunity.**

Comment noted. See frequent comment response concerning EIS alternatives that can meet the proposed objective.

2. **The DEIS does not consider a down turn in economic activity.**

The growth estimations in the EIS for each alternative are for a 20-year time horizon consistent with the Seattle 2035 Comprehensive Plan. Estimations of housing and jobs are identified as estimations. See Appendix G for discussion of methodology for growth estimations. 20-year estimations are expected to account for potential economic cycles that could occur over the time horizon.

3. **The DEIS does not consider the timeline for delivering projects or the location of the affordable housing units.**

See frequent comment response concerning location of MHA affordable housing units.

4. The DEIS does not look at impacts created by increased speculation due to anticipation of possible increases in development capacity.

See comment response concerning amount of the MHA affordable housing requirements. See also response to Bertolet, Dan concerning potential economic effects of MHA implementation on development project feasibility and land value.

5. Access to local jobs could prevent displacement and transportation burden.

Comments noted.

6. What supports the approach studied in Alternative 3, that smaller development capacity increases in areas with high risk of displacement are a possible way to minimize potential displacement?

The potential for the proposed approach in Alternative 3 to mitigate displacement is analyzed in the EIS. See discussion of direct, economic and cultural displacement in Section 3.1 Housing and Socioeconomics.

7. Numbers in Exhibit 3.1-42 show the opposite of a statement in the text concerning the amount of total new housing in high displacement risk low access to opportunity areas.

Thank you. A sentence in the text paragraph in Alternative 2 was an error in the DEIS. This is corrected in the FEIS. Quantities of total net new housing in DEIS Exhibit 3.1-42 are correct.

8. Why isn't there more focus on the Rainier Valley in light of average monthly rent data.

Comment noted. It is unclear from the comment what is intended by more focus, or how the question relates to the DEIS analysis.

9. How does a policy of limiting development prevent displacement? Rainier Valley has had little private residential development but has experienced displacement.

Comment noted. Please see discussion in Section 3.1 Housing and Socioeconomics of direct, economic and cultural displacement. The discussion of impacts in the section describes how limiting the supply of new housing in an area could result in greater economic displacement impact.

10. Why are there so few MHA affordable housing units projected to be located in one of the urban villages most at risk of displacement?

Comment noted. See frequent comment response concerning location of MHA affordable housing units.

11. How does the EIS support increased production of rent and income restricted units in areas with high percentages of people of color?

Comment noted. See frequent comment response concerning location of MHA affordable housing units.

12. The DEIS shows a small area of SM zoning around the light rail station that does not reflect planning with the community over the past 5 years, and height limits in the action alternatives should be higher.

Comment noted. Please see the Preferred Alternative map for Rainier Beach at Appendix H.

Rakic, Helen

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Rasmussen, Hans

1. Expresses support for the concerns raised in the letter sent by the Capitol Hill Renter Initiative.

Thank you for your comments. Comments noted. Please see response to Brennan, Alex, which addresses the letter in full.

2. The alternatives could do a better job addressing climate change.

Thank you for your comments. Comments noted. Please see Chapter 3.9, which includes discussion of greenhouse gas emissions under each alternative.

Reed, Trevor

1. Preference for highest density in the most concentrated area option

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

2. Interest in integration of incomes in developments

Please see EIS Appendix C MHA Implementation Principles, which include "Housing Options a. Encourage or incentivize a wide variety of housing sizes, including family- sized units and not just one-bedroom and studio units." Please also see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent

comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

3. Interest in a diversity of land uses, with priority for public space, non-motorized transit, disincentivize parking and driving

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures, including updates to Incorporated Plan Elements. Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as Relevant Plans and Policies, which includes “New sidewalks, particularly near schools” as part of the City of Seattle 2017–2022 Transportation Capital Improvement Program.

Please see frequent comment response concerning *Impacts to parking*.

4. Create more appealing spaces by reducing parking and creating a coherent built environment

Please see frequent comment response concerning *Impacts to parking*. Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures. Please also see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

5. Reduce parking, improve transit and non-motorized modes

Please see frequent comment response concerning *Impacts to parking*. Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as Relevant Plans and Policies, which includes Pedestrian and Bicycle master plans.

6. More balanced land uses to support biological resources in the city

Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

7. Create green corridors where vehicles are not permitted

Thank you for your comment. Your comment is noted and will be shared with City staff.

8. Emphasize green infrastructure

Please see frequent comment response concerning *Impacts to Stormwater Infrastructure*.

9. Emphasize trip reduction strategies

Please see Chapter 3.4 Transportation for discussion of impacts and mitigation measures, including incorporated plan features such as Expanding Travel Demand Management.

Rees, Janine

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Reigart, John

1. DEIS does not include a broad range of action alternatives

Please frequent comment response concerning *Alternatives to MHA that could achieve objectives*.

2. DEIS does not evaluate impacts on individual neighborhoods

Please see frequent comment response concerning *Individual urban village review*.

3. Displacement risk / Access to opportunity typology is flawed, include medium designations

Please see frequent comment response concerning *Displacement Risk Access to Opportunity Typology*. Furthermore, the existing typology is integral to the policy proposal, for which impacts are assessed in the EIS. The EIS is not an assessment of the typology itself.

4. Displacement risk does not reflect proposed zone changes, and each urban village should be evaluated with zone changes considered

Please see response to comment #3 above.

5. Displacement risk analysis only includes multifamily buildings of 20 or more units, should include other housing types by urban village

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

Note that Chapter 3.1 includes displacement analysis that incorporates single family housing types and larger.

6. Concern about zone changes in Crown Hill from single family to NC along 16th and Mary Avenues; EIS should consider property taxes, traffic, parking, and other impacts associated with changes of use from residential to commercial

As described in Frequent Comment Topic A, "Individual Urban Village Review," the DEIS is a programmatic document designed to assess impacts at a citywide scale. Detailed evaluation of effects of planning-level alternatives in specific locations would depend on site-

specific information not yet available, such as building footprints, heights, and locations. Evaluation of these impacts is best done at the project level through site-level SEPA review or the building permit process, as described on page 3.165.

Please see FEIS Chapter 2.0 Description of the Proposal and Alternatives and Appendix H Zoning Maps. The preferred alternative for the Crown Hill urban village does not include zone changes from single family to neighborhood commercial as discussed by commenter.

7. Concern that existing single family and adjacent lowrise conditions are not studied in Crown Hill

See comment response to Bricklin, David comment 6. Please also see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures, as well as frequent comment response concerning *Individual urban village review*.

8. Concern about light rail inequity between urban villages

Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

9. Concern about public school capacity and proposed mitigation

Please see frequent comment response concerning *Impacts to Seattle Public School capacity*.

Reilly, Wendy

1. Concerns about changes in the Madison-Miller neighborhood.

2. The area is already dense and will exceed housing density goals before 2035 with no changes.

See Chapter 2, which estimates growth over a 20-year period under each alternative. See objectives of the proposal as described in Chapter 2, which include production of at least 6,200 net new rent and income restricted housing units within the study area.

2. We already have a mix of multifamily housing. New construction is expensive housing.

Please see Section 3.1 Housing and Socioeconomics for a discussion of housing affordability. MHA, under the action alternatives, would require new development to make a contributions towards affordable housing.

3. Traffic and parking already suck and would get worse.

Please see response to Holliday, Guy which addresses numerous topics concerning the Madison-Miller urban village including parking. Please see also response to Peterson, Shawn-1 concerning the greenway.

4. The arterials seem to be the appropriate place for more dense housing.

Comment noted. Please see MHA implementation principles at Appendix C. Please see also Section 3.9 Air Quality and Greenhouse Gas Emissions.

5. How about upzoning Laurelhurst or Madison Park.

Comment noted. Please see frequent comment response concerning single family zones outside the study area.

Renick, Julie

1. Supports comments and conclusions of the Madison Miller Park Community Group.

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

2. Single family homes have groups of individuals and families that are hidden affordable housing.

Please see Section 3.1 Housing and Socioeconomics for a discussion of housing affordability for different income groups and demographics.

3. Slope makes it difficult to walk to the Capitol Hill or UW light rail stations.

Comment noted. Please see discussion of transit service in Section 3.4 Transportation. Please note that no urban village boundary expansion is proposed in the action alternatives for the Madison Miller urban village.

4. Halting efforts to install solar panels.

Comment noted. Please discussion of land use impacts in Section 3.2 Land Use.

5. There is demand for single family housing in Madison Miller.

Comment noted.

6. Proposed action would lead to property tax increases causing impact.

Comment noted. Please see additional discussion in the FEIS section 3.1.2 impacts, of impacts of property tax increases on homeowners.

7. Seattle is not child friendly.

Comment noted. Please see frequent comment response concerning family-friendly housing.

8. Madison Miller is exceeding growth targets and growth should be spread out to other areas.

Comment noted. Please see growth estimates for every urban village in Chapter 2.

9. Historic homes will be torn down. There is a need for walking/running spaces due to limited green space.

Please see section 3.5 Historic Resources, and section 3.7 Open Space and Recreation.

Rhodes, Susan

1. Not clear what is meant by “alternative plan”

Please see EIS chapters 1, 2, and 3 for information about the No Action Alternative and two action alternatives for the proposal to implement Mandatory Housing Affordability (MHA) in the study area. Please see the [SEPA Online Handbook](#) for more information about the SEPA process, including the following:

“An environmental impact statement (EIS) is prepared when the lead agency has determined a proposal is likely to result in significant adverse environmental impacts (see section on how to Assess Significance). The EIS process is a tool for identifying and analyzing probable adverse environmental impacts, reasonable alternatives, and possible mitigation.”

The term “alternatives” refers to a set of potential options that an agency could pursue. In the MHA EIS, alternatives include the No Action Alternative (Alternative 1), and the two action alternatives (Alternatives 2 and 3).

2. Concern that displacement risk does not include homeowners

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods.

Please see frequent comment responses concerning *Property taxes*, *Impacts on racial and cultural minority groups*, and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

3. Aesthetics do not account for areas not currently developed to maximum buildout

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures. Please see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

4. Concern that transportation impacts for West Seattle are incorrect

Please see response to Tobin-Presser, Christy-3.

5. Concern about tree canopy

Please see frequent comment response concerning *Impacts on tree canopy*.

Rich, Samantha

5. Opposes policy or use changes for natural parks lands.

Thank you for your comment. Please see frequent comment response on the topic. No policy or use changes for natural parks lands are proposed as part of the proposed action to implement MHA.

Riebe, Edgar

1. The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

Roberto, Michael

1. Commenter supports Alternatives 2 and 3

Thank you for your comment. Your comment is noted. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

2. Commenter supports Alternative 3 consideration of displacement and mitigations

Please see response to comment #1 above and EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

3. Commenter agrees with land use conclusions concerning density

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures.

4. Concern about maintaining transportation infrastructure including bridges

Please see Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

5. Commenter supports added open space

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures.

Robertson, Kiran

1. Description of the tight-knit community in the 26000 Block of 45th Ave. SW and concern that the proposed action would destroy it.

Thank you for your comments, and your strong support of your community. Comments noted.

2. Congestion and parking is difficult on areas roads and the proposal would increase these difficulties.

Comments noted. Please see discussion of traffic and parking impacts in Section 3.4 Transportation.

3. The proposed action would not actually create more housing for low-income households.

Comments noted. Please see estimation of rent and income restricted housing units that would be produced under the action and no action alternatives in Section 3.1 Housing and Socioeconomics.

Rodak, Ann

1. Some places lack park space, and school-owned field spaces are crowded.

Thank you for your comment. Please see analysis in Section 3.7 Open Space and Recreation, which includes estimations for the amount of parks acreage in each urban village per population, and discussion of potential impact to park availability.

2. Parks spaces could feel bigger if they were interconnected.

Thank you for the comments. Comments noted. Please see additional discussion of mitigation measures in Section 3.7 Open Space and Recreation. Strategies described include improving connections to open space, as well leveraging public right of ways and other infrastructure facilities, as approaches to improve the open space network.

Rodriguez-Lawson, Roberto

1. Commenter agrees with Crown Hill Urban Village Committee for Smart Growth

Please see comment response to Krueger, Ingrid.

2. Concern about lack of light rail

The MHA EIS relies on growth estimates from the Comprehensive Plan, which is our best available guide for estimating housing and job growth citywide. New transportation investments such as bus service

often occur at more regular intervals than the Comprehensive Plan planning horizon, a period of twenty years.

Please also see comment response to Krueger, Ingrid.

3. Concern about Crown Hill's lack of proximity to a major job center

Please see Chapter 3.4 Transportation for discussion of impacts and mitigation measures. Please also see frequent comment response concerning *Individual urban village review*.

4. Concern about heights and poor living environment among larger scale buildings

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures. Please also see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

5. Concern about changes to Design Review and inconsistency with proposed Design Review changes

Note that proposed changes to the Design Review Program as discussed by City Council in September 2017 include lowering thresholds for areas where zone changes occur through MHA.

6. Concern about lack of sidewalks

Please also see frequent comment response concerning *Impacts to Stormwater Infrastructure*. Also note that new development inside urban villages requires sidewalks in many cases. Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as Relevant Plans and Policies, which includes "New sidewalks, particularly near schools" as part of the City of Seattle 2017–2022 Transportation Capital Improvement Program.

7. Concern about walkability and safety in flooded areas

Please also see frequent comment response concerning *Impacts to Stormwater Infrastructure*. Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

8. Concern about disparity between villages with and without light rail

Please see response to comment #2 above.

9. Concern about transit commute time from Crown Hill to downtown

Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

10. Concern about DEIS understating impacts to tree canopy

Please see frequent comment response concerning *Impacts on tree canopy*.

11. Concern about significant reductions in green space and lack of discussion about mitigation

The EIS describes the indirect impacts to parks and open space that would occur from growth under all three alternatives. See Section 3.7.2. Mitigation measures are identified in Section 3.7.3 that could plausibly mitigate the identified impacts over the 20-year planning horizon. In the FEIS additional specificity about parks and open space mitigation measures is provided. See also Holliday, Guy response 14 concerning open space.

12. Concern about walkability and safety in flooded areas

Please see frequent comment response concerning *Impacts to Stormwater Infrastructure*. Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

13. Concern about impacts to Seattle Public Schools

Please see frequent comment response concerning *Impacts to Seattle Public School capacity*.

14. Concern about flooding and impacts to stormwater drainage

Please see frequent comment response concerning *Impacts to Stormwater Infrastructure*. Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

Rosenberg, Doug

1. Concerned about impacts to parking and traffic in the Madison Miller neighborhood.

Thank you for your comment. Please see Section 3.4 Transportation.

2. Supports comments and conclusions of the Madison Miller Park Community Group.

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Rose Ryan, Jenny

1. Commenter notes Alternative 3 focuses growth where there is infrastructure

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

2. Concern about displacement of people of color

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent

comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*, as well as the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses payment dollars to fund acquisition and rehabilitation of existing housing.

3. Commenter prefers Alternative 3 for integrating impacts of topography

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix C MHA Implementation Principles, which include considering “Unique Conditions” such as topography.

4. Commenter considers Alternative 3 to be more responsive to existing housing stock

Thank you for your comment. Your comment is noted. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see response to comment #2 above.

5. Concern about accessibility where there are no sidewalks

Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as Relevant Plans and Policies, which includes “New sidewalks, particularly near schools” as part of the City of Seattle 2017–2022 Transportation Capital Improvement Program. Also note that new development inside urban villages requires sidewalks in many cases.

6. Concern about Alternative 2 focusing growth where there are fewer services

Please see comment responses above.

Ross, Jenn

1. The comment document requests completion of an EIS pertaining to just the South Park neighborhood. The comment document notes that South Park has serious environmental issues, and expresses concern about notice and public engagement.

Comments noted. Thank you for your comment. Please see frequent comment responses concerning individual urban village review and community engagement. Please see also Appendix B. Please see the Preferred Alternative map at Appendix H for South Park. In recognition of constraints in South Park, the minimum zoning changes necessary to implement MHA are proposed for the South Park area. This approach is consistent with the approach proposed for areas outside of urban villages under the action alternatives. Georgetown is an areas outside of an urban village, and proposed

MHA implementation is limited to existing commercial and multifamily zoned properties under the action alternatives.

Rostosky, Jay

1. **The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.**

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

Roth, Susan

6. **Opposes policy or use changes for natural parks lands.**

Thank you for your comment. Please see frequent comment response on the topic. No policy or use changes for natural parks lands are proposed as part of the proposed action to implement MHA.

Roxby, Alison

7. **Developers should contribute more to public services.**

Thank you for your comment. Comments noted. Please see discussion in Section 3.8 Public Services and Utilities and Section 3.4 Transportation. Please also see discussion of mitigation measures in Section 3.8 Public Services and Utilities, Section 3.7 Open Space and Recreation. Please note that MHA implementation under the action alternatives would require developers to contribute to affordable housing. Please see discussion of the proposed MHA affordable housing requirements in Chapter 2.

8. **Concern about overcrowding in Seattle Public Schools.**

Please see additional analysis in the FEIS in Section 3.8 Public Services and Utilities on school capacity and potential impacts from the alternatives. Please also see frequent comment response concerning coordinated planning with Seattle Public Schools. Please see also response to Pollet, Gerry.

9. **MHA implementation would hurt children because more apartments would be built in urban villages that have limited amenities including parks, libraries and community centers.**

Comments noted. The approved Seattle 2035 Comprehensive Plan prioritizes investment in amenities and infrastructure including libraries, parks and community centers in urban villages. Please see also MHA Implementation Principles at Appendix C, concerning location of additional housing near assets and infrastructure. Please see analysis of impacts in FEIS section 3.0.

10. Concern about the notice and community engagement process.

Please see frequent comment response concerning community engagement.

Ruby, Mike**11. The EIS should identify more specific solutions to potential impacts and there should be cost estimates for those. Examples are cited related to transportation, parks and open space and public services and utilities.**

Thank you for your comment. For programmatic proposals, including implementation programs like MHA, the SEPA Rules require that an EIS contain a general discussion of the impacts of alternative proposals for plans, land use designations or implementation measures. The SEPA rules state that possible mitigation measures that can reduce or eliminate adverse environmental impacts should be discussed. The rules note that where technical feasibility or economic practicality of mitigation measures are uncertain, the measures should still be discussed and uncertainties should be acknowledged. Discussion of mitigation measures is included for each element of the environment where potential adverse impact is identified. Discussion of mitigation measures that are reasonable and capable of being accomplished are included.

12. Housing availability is determined by the flow of units on the market, so annual turnover of housing units is an important factor whether there is a housing shortage. Increasing turnover rate for low-income housing could be a solution to relieving the shortage of affordable housing units.

Comments noted. Thank you for the analysis provided in the comment. The comment suggests that services to tenants allowing them to graduate from rent-restricted housing could enable more low-income households to use existing rent restricted housing. Seattle Housing Authority, and many non-profit affordable housing providers have existing programs to connect tenants to counseling and training services. It is not apparent that the rate of turnover would increase dramatically however. See discussion in Chapter 3.1 regarding the relative quantities of subsidized housing units and populations who are low or very low income.

13. A reviewing the analysis of the relationship between housing production and gain or loss of low-income households should conclude that there are far more factors than housing production that influence change in income distributions within census tracts.

Comments noted. It is acknowledged that many other factors are at play. Please see the additional correlation analyses in the FEIS for other income groups and populations in different racial groups.

14. The consideration of whether you could raise the MHA requirement was poorly designed.

Comments noted. In addition to the economic analysis referenced, the discussion of alternatives considered but not included in detailed analysis also discusses initial formulation of the MHA requirement amounts.

Rulifson, Brian

1. The City should pass an ordinance requiring consideration of school capacity in all land use planning decisions.

Comment noted. Please see additional analysis of Seattle Public Schools (SPS) capacity in the FEIS in Section 3.8 Public Services and Utilities.

2. City Council must not allow upzones in any school geozone that exceeds 90% capacity.

Comment noted. Please see additional analysis of Seattle Public Schools (SPS) capacity in the FEIS in Section 3.8 Public Services and Utilities.

3. The City Council should pass an ordinance adopting impact fees for additional school capacity.

Comment noted. Please see additional discussion of mitigation measures in Section 3.8 Public Services and Utilities.

4. Raise the MHA affordable housing requirements from to 35%

Comment noted. Please see frequent comment response concerning MHA affordable housing requirement amount, and please see discussion in section 2.4 alternatives considered but not included in detailed analysis.

Sabersky, Sandy

1. Concerned about loss of charm due to larger new buildings.

Thank you for your comments. Please see Section 3.3 aesthetics for discussion and depiction of aesthetic impacts stemming from the proposed action.

2. Supports comments and conclusions of the Madison Miller Park Community Group.

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Saganić, Erik

1. Puget Sound Clean Air Agency requests Exhibit 3.9-2 be revised.

The Puget Sound Clean Air Agency has provided links to annual data summaries for revising and updating Exhibit 3.9-2. Exhibit 3.9-2 has been revised and updated accordingly.

2. Revise incorrect statement on page 3.318.

The incorrect statement, “The federal daily PM_{2.5} standard has not been exceeded in the Puget Sound area since the initiation of monitoring for this pollutant in 2001 (PSCAA 2015),” has been revised to state that the Tacoma-Pierce County areas have exceeded the daily PM_{2.5} standard in 2008 and was recently redesignated as a maintenance area in 2015.

3. Provide reference for statement on page 1.35.

A reference was not provided for the statement, “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 up to 800 in one million.” The reference is:

Washington State Department of Health (WSDH), 2008. “Health Consultation: Summary of Results of the Duwamish Valley Regional Modeling and Health Risk Assessment Seattle, Washington”.

The DEIR has been updated with this reference. Furthermore, the cancer risks were determined from Figure 5d in the reference. Due to the ambiguous nature of reading values from gradient figures, the cancer risk value was removed from the DEIS.

Sampson, Bill

1. Concern that Alternatives 2 and 3 are too extreme, citing gentrification in Othello, and supporting more density where there is less risk, such as North Seattle

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix H Zoning Maps.

Please also see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

Sandler, Nora

1. Commenter prefers Alternatives 2 and 3, support for higher performance requirements and more upzoning in Ballard

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix H Zoning Maps.

Please see frequent comment response concerning *MHA affordable housing requirements* and *Location of MHA housing units*.

2. Concern about displacement risk and suggestions for improvements

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

Also note that the Seattle Department of Construction and Inspections (SDCI) has expedited permitting for projects that provide 100% of their units as affordable housing.

3. Concern about durability of new housing

Please see frequent comment response concerning *MHA affordable housing requirements* and *Location of MHA housing units*. Note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

Sang, Andrew

1. Focus upzones in regions where there are more amenities and avoid large upzones in region with high displacement risk.

Comment noted. Thank you for your comment. Please see the description of the Preferred Alternative in FEIS Chapter 2.

2. Make relatively larger upzones in blocks in close proximity to light rail transit, especially Roosevelt and Capitol Hill.

Comment noted. Thank you for your comment. Please see the description of the Preferred Alternative in FEIS Chapter 2, and see Preferred Alternative maps for the mentioned urban villages at Appendix H.

3. Upzone the Central Area significantly.

Comment noted. Please see the description of the Preferred Alternative in FEIS Chapter 2, and see Preferred Alternative maps for the mentioned urban villages at Appendix H. Under the Preferred Alternative MHA is applied throughout the Central Area. However, as an urban village with high displacement risk, locations more than a 5-minute walk from a frequent transit node are generally proposed for MHA implementation with an (M) tier zoning change.

4. Study the effects of retaining a percentage of the MHA funds in the neighborhood from which they are generated.

Comment noted. Please see discussion in section 2.4 of varying geographic distribution of MHA affordable housing payment units.

5. Increase all zoning citywide especially in single family zoned areas.

Comment noted. Please see frequent comment response concerning single family areas outside of the study area.

Saunders, Laura

1. Objects to zoning changes in the area bounded by 12th, 15th, 66th, and 70th. Preserve the neighborhood.

Comment noted. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see MHA implementation principles at Appendix H.

Sawyer, Amanda-1

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

2. Please hold individual neighborhood open houses to discuss the proposed action.

Comment noted. Please see frequent comment response concerning community engagement, and please see Appendix B summary of community engagement.

3. Questions about the traffic studies for the West Seattle Junction area.

Comment noted. Please see response to Tobin-Presser, Christy-3 regarding traffic and transportation analysis. The analysis did include assumptions for construction of light rail by the year 2035. The afternoon peak hour is analyzed because it is the most congested time of day.

Sawyer, Amanda-2

1. **Concern that affordable units would not be located in neighborhoods near where development occurs due to the payment option.**

Comment noted. Please see frequent comment response regarding location of MHA affordable housing units.

2. **DEIS fails to recognize middle class families.**

Comment noted. Please see frequent comment response regarding family-friendly housing.

3. **Design review will not be effective mitigation.**

Comment noted. Please see expanded discussion in the FEIS of design review including updates for recent amendment to the program.

4. **Are transportation assumptions based on future light rail? Peak hours do not reflect AM travel times.**

Yes, transportation assumptions assume light rail construction. See comment response to Tobin-Presser,Christy-3 regarding Transportation.

5. **How could developers be required to contribute to green space.**

Impact fees for open space are one of the allowed purposes for required impact fees under State law.

Scarlett, Jennifer-1

1. **Comments concerning length and scope of the Draft EIS, notification of its publication in South Park, and a request for extending the comment period.**

Thank you for your comments. Comments noted. The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period. Please also see comment response concerning community engagement.

Scarlett, Jennifer-2

1. **Request for extending the comment period.**

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Scarlett, Jennifer-3

1. The Draft EIS does not adequately describe urban villages.

Please see DEIS Section 2.2 Planning Context for a description of the Seattle 2035 Comprehensive Plan, which establishes urban villages in Seattle and sets policy for guiding growth to these areas.

2. Some urban villages do not meet the criteria for the urban village designation.

Comment noted. In accordance with the Washington State Growth Management Act (GMA), urban villages were first designated in the 1990s when Seattle adopted its first Comprehensive Plan, which outlined a strategy for encouraging most future job and housing growth to occur in specific areas best able to absorb and capitalize on growth. The recent Seattle 2035 Comprehensive Plan update reaffirmed and strengthened this urban village strategy. Please see also the Growth Strategy element of the Seattle 2035 Comprehensive Plan.

3. Certain areas are protected from growth and redevelopment, while other lower-income areas like South Park are targeted for zoning changes and growth. Comments request a map showing areas suitable for increased population density.

Comment noted. Please see DEIS Section 2.1 for an overview of the proposed action, which proposes development capacity increases in areas including urban villages. See Exhibit 2–1 for a map of the study area where the DEIS analyzes zoning changes. See also Chapter 3 for analysis of potential impacts of increased population density.

Scarlett, Jennifer-4

1. The EIS should include traffic studies for SR 99, SR 509, and I-5.

Please see DEIS Chapter 3.4 Transportation, particularly Section 3.4.2 which estimates impacts on travel time using screenlines across the city.

2. Concern about small business impacts and adequacy of outreach to affected businesses in South Park.

Comment noted. Please see the discussion of commercial displacement in Section 3.1.2 Impacts. See also the frequent response related to *community engagement*.

3. Air quality and health impacts from diesel particulate should be evaluated in the DEIS. This is an ongoing issue for South Park.

Comment noted. Please see Chapter 3.9 Air Quality and Greenhouse Gas Emissions. In particular, see Exhibit 3.9–2 for data on air quality, including particulate matter, at various locations in Seattle.

Scarlett, Jennifer-5

1. The proposal will reduce property values.

Comment noted. Please see additional discussion in FEIS Section 3.1.2 Impacts on the potential impacts of the proposal on property values and property taxes for homeowners. Please also see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, many of which include family-size units such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single-family areas, allows for more family-size and family-style housing in areas currently zoned single-family. Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program and mitigation measures.

Scarlett, Jennifer-6

1. The EIS should discuss potential impacts of flooding, climate change, and sea level rise on low-lying lands in the Duwamish Valley, South Park, and Georgetown.

Please see Chapter 3.6 Biological Resources for discussion of impacts on designated Environmentally Critical Areas (ECAs), which include flood-prone areas. Exhibits 3.6–2 and 3.6–7 quantify land area in urban villages containing each ECA type for each alternative, including flood-prone areas. Exhibits 3.6–3, 3.6–4, 3.6–9, and 3.6–10 show where mapped ECAs are located throughout the city in relation to proposed expansions of urban villages.

Scarlett, Jennifer-7

1. Environmentally Critical Areas (ECAs) should be removed from zoning changes and are not appropriate for additional population density or growth.

Comment noted. Please see Chapter 3.6 Biological Resources for discussion of potential impacts on designated ECAs. Note that Chapter 25.09 of the Seattle Municipal Code regulates, restricts, and/or limits development in ECAs.

2. ECA land area should be mapped in the EIS and quantified by urban village.

Exhibits 3.6–3, 3.6–4, 3.6–9, and 3.6–10 show where mapped ECAs are located throughout the city. See also Appendix K and Exhibits K–1 and K–2, which quantify ECA land by MHA zone category. Please also see frequent response related to individual urban village environmental review.

Scarlett, Jennifer-8

1. **Notice and outreach about the proposal and the EIS was insufficient in South Park.**

Comment noted. Please see frequent response related to *community engagement*.

Scarlett, Jennifer-9

1. **The EIS should include analysis of physical and mental health impacts of redevelopment in an increasingly urban environment.**

Comment noted. See Chapter 3.9 Air Quality and Greenhouse Gas Emissions for a discussion of impacts and mitigation related to public health. Consistent with SEPA policies for an EIS, the DEIS focuses on the elements that the proposal is most likely to affect, as determined through the scoping phase. Mental health was not an element of the environment identified during scoping for detailed impact analysis.

2. **The EIS should include studies of suicide rates in low-income areas experiencing redevelopment.**

Scarlett, Jennifer-10

1. **The EIS should contain information about actual, not scheduled, bus headways in urban villages.**

The EIS evaluates potential impacts and mitigation over a 20-year planning horizon. Therefore, the analysis of impacts on demand for transit rely on the long-range planning framework that the Seattle Department of Transportation (SDOT) has established in its *Transit Master Plan* (TMP). Please see the discussion of the TMP in Section 3.4.1 Affected Environment, Transportation, particularly the priority transit corridors illustrated in Exhibit 3.4–15. See also the analysis in Section 3.4.2 Impacts, Transportation, which describes the transit service assumptions from Sound Transit and King County Metro used to estimate impacts over the 20-year planning period.

2. **Bus service in South Park is unreliable, and residents there rely on cars to get around.**

Comment noted. Please discussion of potential impacts on travel time and parking in Chapter 3.4 Transportation. Please also see the frequent response related to *parking impacts and mitigation*.

Scarlett, Jennifer-11

1. **The EIS does not adequately analyze impacts on tree canopy.**

Thank you for your comment. Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *tree canopy*.

2. **The EIS should analyze impacts at the urban village level. Each urban village should have its own SEPA analysis.**

Comment noted. Please see the frequent comment response related to *individual urban village review*.

3. **Studies included in the Duwamish River Cumulative Health Impacts Analysis should be included in the EIS.**

Thank you for your comment. The FEIS adds a reference to this report in Chapter 3.6 Biological Resources.

Scarlett, Jennifer-12

1. **The visualizations in Chapter 3.3 Aesthetics do not show the most significant potential impacts resulting from zoning changes.**

Please see comment response to Bricklin, David comment 6.

2. **The Aesthetics visualizations show a street that is wider than many typical streets where zoning changes are proposed.**

Street widths vary throughout the city. The Aesthetics visualizations in DEIS Exhibits 3.3–12 through 3.3–15 illustrate representative scenarios for areas with the existing zoning depicted in each image. See also comment response to Bricklin, David comment 6.

3. **The Aesthetics visualizations should reflect the fact that fully restored historic homes are unlikely to be demolished and replaced with new single-family homes.**

Comment noted. Because the specific design, architectural style, and scale of single-family houses vary widely throughout the city, the visualizations show representative conditions across a range of scenarios and contexts. The visualizations illustrate the height, bulk, and scale of single-family houses allowed under current regulations as well as the potential impacts of redevelopment for each action alternative under two different scenarios of varying redevelopment intensity. While estimating the historic value of individual structures is outside the scope of this EIS, please see also Chapter 3.5 Historic Resources.

4. **The EIS should include a map showing single-family zones where zoning changes are proposed and a map showing existing building heights.**

Chapter 2 describes the proposal, which would involve rezoning single-family-zoned land in current and expanded urban villages. A citywide map showing areas in use as single-family is shown in Exhibit 3.2-2. For more detail, please see the individual urban village zoning maps for each action alternative in Appendix H.

For height limits, please see Exhibit 3.3–1, which illustrates the maximum allowed structure height across the city. Existing building height often differs from the maximum height limit; buildings can be lower or higher than the maximum height limit. The EIS focus on

potential impacts of changes in maximum height limits that could affect future development occurring of the 20-year planning horizon.

Scarlett, Jennifer-13

1. **Community engagement has not been sufficient to gauge potential aesthetic impacts from the proposal.**

Please see the frequent comment response related to *community engagement*.

2. **Design Review should be not listed as a mitigation strategy because most new buildings will not be subject to Design Review.**

DEIS Exhibit 3.3-6 stated design review thresholds for review. The FEIS includes updated information on design review thresholds reflecting recent action by the City Council to modify design review thresholds.

The FEIS includes updated discussion of design review thresholds to reflect recent action by City Council. In new design review regulations, special consideration is given in design review thresholds for areas being rezoned from single family to implement MHA. See also response to Bricklin, David comment 4.

Scarlett, Jennifer-14

1. **The EIS does not sufficiently analyze the presence or adequacy of infrastructure such as water, sewer, electricity, gas, and sidewalks.**

Please see Chapter 3.8 Public Services and Utilities. Please also see frequent comment response concerning *Impacts to Stormwater Infrastructure*. Also note that new development inside urban villages requires sidewalks in many cases. Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as Relevant Plans and Policies, which includes “New sidewalks, particularly near schools” as part of the City of Seattle 2017–2022 Transportation Capital Improvement Program.

Scarlett, Jennifer-15

1. **The reference on p. 1.1 to a one-bedroom apartment being unaffordable to a “worker earning \$15 minimum wage” should be removed because MHA will provide housing for people up to 60 percent of AMI, not very-low-income households.**

This statistic illustrates the overall need for more affordable housing options at a broad range of income levels, including but not limited to the income levels that MHA will directly serve.

2. State why modifying certain rezone criteria in the Land Use Code is necessary.

A description of the proposal to modify certain rezone criteria, and the proposed modifications themselves, are available in Appendix F.

3. Report the number of MHA rent- and income-restricted housing units created solely from development in the study area.

Exhibit 3.1–35 distinguishes the estimated number of rent- and income-restricted housing units generated from growth in the study area from the total number of affordable units built in the study area using MHA payments collected citywide.

4. Remove the phrase “broad range of households” because MHA is not intended to provide housing for very-low-income households.

As stated in Section 1.2 Objectives of the Proposal, MHA is intended to create both rent- and income-restricted housing units for households with incomes up to 60 percent of the area median income (AMI) and increase overall housing production to help meet current and projected demand for housing. Rent- and income-restricted housing and market-rate housing together serve a broad range of households. For further context on housing cost in Seattle, see also Exhibit 3.1 – 19 showing the relative share of unsubsidized rental housing affordable to various income levels and Exhibit 3.1–20 showing average monthly rent by unit type in various market areas.

5. Do not speculate about potential future strong demand for housing. The growth strategy in the Seattle 2035 Comprehensive Plan fulfills Seattle’s obligation for population growth without any zoning changes.

The Seattle 2035 Comprehensive Plan estimates that Seattle will welcome 70,000 new households by 2035. The Seattle 2035 Final EIS analyzed this amount of new housing growth. That EIS also studied additional growth up to 100,000 new households in a sensitivity analysis. The phrase “potential future strong demand for housing” refers to the rationale for studying a higher level of housing growth in the Seattle 2035 Final EIS.

As stated in the Seattle 2035 Comprehensive Plan and in the MHA Draft EIS, current zoning has sufficient development capacity for the growth estimates identified in the Comprehensive Plan. While theoretical development capacity exists to accommodate this future growth, Section 1.3 of the MHA EIS notes that 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 growth strategies studied in that EIS. The Seattle 2035 Comprehensive Plan and EIS provide context for the MHA proposed action. Please see Section 1.3 for more discussion and Section 3.1 for analysis of impacts on housing affordability under all three alternatives.

6. The statement that higher MHA requirements would apply in strong market areas and lower requirements in weaker market areas is false.

Within the study area of this EIS, higher affordable housing requirements would apply to development in strong market areas and lower requirements in weaker market areas, as shown in Appendix E. MHA requirements for areas outside the EIS study area, such as Downtown and South Lake Union, vary by zone and were established through a separate prior action. See Sections 23.58B.040, 23.58B.050, 23.58C.040, and 23.58C.050 of the Seattle Municipal Code for the specific affordable housing requirements in those zones.

7. Clarify that under Alternative 1 No Action no Land Use Code changes would occur.

Please see Section 1.4 Alternatives for a description of Alternative 1 No Action.

8. Alternatives 2 and 3 are the same. Another option to create affordable housing should be studied in the EIS.

Please see the frequent comment response related to *Alternatives to MHA to reach objectives*.

9. Please define “frequent transit station” in the EIS.

The proposal includes urban village boundary expansions studied in the Seattle 2035 Comprehensive Plan process. See the Glossary of the Seattle 2035 Comprehensive Plan, which defines frequent transit as “Generally, bus or train service that arrives at intervals of fifteen minutes or less.” Also see Transportation Figure 5 in the Seattle 2035 Comprehensive Plan, which shows the planned frequent transit service network, and Exhibit 3.4–15 in the MHA EIS, which shows the priority transit corridors from the *Transit Master Plan*.

10. The EIS doesn’t show the impacts of market-rate housing construction on property taxes.

Please see additional discussion in the FEIS section 3.1.2 impacts, of impacts of property tax increases on homeowners.

11. The continued challenge of affordability for market-rate housing negates the rationale for the proposal.

Please see Section 1.3, Objectives of the Proposal.

12. The term “significant” is opinion and should be removed.

Please see the SEPA Rules in Washington Administrative Code (WAC) 197-11-794, which defines “significant” when used in the context of SEPA.

Scarlett, Jennifer-16

1. **Remove the term “significant” from discussion of impacts from demolitions.**

Please see Washington Administrative Code (WAC) 197-11-794, which defines “significant” when used in the context of SEPA.

2. **The EIS must include the estimated number of affordable units that will be demolished.**

Please see Exhibit 3.1–38, which presents two different methods for estimating the number of housing units demolished under each alternative.

3. **In the EIS Summary, the estimated number of rent- and income-restricted units created for each low-income household physically displaced in Alternatives 2 and 3 is incorrect.**

Please see Exhibit 3.1–39 and the methodology described in Section 3.1 under the heading Demolition and the heading Physical Displacement of Low-Income Households Due to Demolitions. This analysis incorporates data from the Tenant Relocation and Assistance Ordinance (TRAO), which serves households earning up to 50 percent of AMI. As described in these sections, the historical trends estimate is based on permitting data for each zone. The estimated ratio of new units to demolished units therefore varies by zone.

Scarlett, Jennifer-17

1. **The Access to Opportunity Index is flawed because it includes data from schools that residents are not automatically allowed to attend by living in that school’s attendance area.**

Please see the Growth and Equity Analysis in Appendix A for description of the methodology used to create the Access to Opportunity Index. The elementary and middle school performance data used includes only those schools with attendance areas, not the geozones associated with option schools.

2. **Adjacency to a high-income area does not give low-income people wealth; it makes the area less affordable.**

Thank you for your comment. “Proximity to high-income neighborhood” is an indicator used in the Displacement Risk Index. It is not used in the Access to Opportunity Index. It is included as an indicator of displacement risk because a census tract with relatively low household income that abuts a tract with relatively high household income is expected to be more likely to see increases in housing demand and housing costs. Please see Appendix A for more description.

3. **The Access to Opportunity analysis is useless because some development will contribute to MHA through the payment option.**

Comment noted. Please see the frequent comment response related to the *location of MHA housing units*.

4. **The EIS uses the Displacement Risk–Access to Opportunity typology to determine where growth should go, but the analysis is flawed and incomplete.**

Comment noted. Please see the frequent comment response related to the *Displacement Risk–Access to Opportunity typology*.

5. **Without including every area of Seattle in the Access to Opportunity analysis and the MHA proposal, the proposal is not equitable because only some communities experience the burden of growth.**

Comment noted. The Displacement Risk and Access to Opportunity indices include all land area in Seattle. Please see the description of the MHA proposal in Chapter 2.

Scarlett, Jennifer-18

1. **The EIS and the Access to Opportunity Index have no analysis of how light rail will affect housing demand or access to downtown. Communities without light rail access will have less access to employment and opportunity even if physically closer to downtown.**

Comment noted. Please see the Growth and Equity Analysis in Appendix A, which includes both current and future light rail stations in all transit analyses. See also Chapter 3.4 Transportation, particularly Exhibit 3.4–15, which illustrates existing and planned frequent transit lines.

2. **The EIS should show estimated travel time when new light rail stations are completed and incorporate these times into estimates of housing demand and population growth.**

Comment noted. Please see Chapter 3.4 Transportation, which includes analysis of potential impacts of each alternative on future transit ridership. See also the Seattle 2035 Comprehensive Plan, which outlines the City's long-term vision for housing and population growth.

3. **Single-family homes with yards continue to be in high demand. Light rail expansion will increase access to the suburbs and therefore decrease housing pressure in Seattle. The EIS should analyze which housing types are most desirable and preserve them in order to reduce suburban sprawl.**

Comment noted.

Scarlett, Jennifer-19

1. **Outreach and publications for the proposal were inadequate. The EIS should describe the outreach materials used for the proposal.**

Comment noted. Please see the frequent comment response related to *community engagement*.

Scarlett, Jennifer-20

1. **Using TRAO data is not appropriate in South Park, where many residents are undocumented and therefore ineligible for relocation assistance.**

It is acknowledged in the EIS that there are limitations to the use of TRAO data for the estimation of the number of displaced low-income households. However, since information is collected to identify displaced low-income tenants for all instances of demolished of housing, TRAO data are the best available comprehensive data source available.

2. **The EIS does not sufficient study displacement of vulnerable populations and low-income people.**

Comment noted. Please see Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlations between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

Scarlett, Jennifer-21

1. **The EIS states that 3,155 affordable units would be built under Alternative 1 No Action. The EIS should state the number of affordable units created because of the action alternatives.**

As shown in Exhibit 3.1–36, under Alternative 1 No Action affordable homes from MHA payments generated outside the study area (e.g., Downtown, the University District) and from existing Incentive Zoning (IZ) in the study area could be created in the study area. Please see comment response Scarlett, Jennifer-15 comment 3.

2. **Each neighborhood requires its own SEPA analysis.**

Please see comment response Scarlett, Jennifer-11 comment 2.

3. **Alternatives 2 and 3 are essentially the same.**

Please see comment response Scarlett, Jennifer-15 comment 8.

4. **The EIS should state the estimated number of physically displaced low-income people.**

Please see Exhibit 3.1–39. Please also see comment response Scarlett, Jennifer-16 comment 3.

5. The EIS should state the number of units demolished.

Please see comment response Scarlett, Jennifer-16 comment 2.

6. TRAO data is insufficient for estimating displacement.

Please see comment response Scarlett, Jennifer-20 comment 1.

Scarlett, Jennifer-22

1. The EIS fails to study impacts of the proposal on Seattle as a whole.

Please see the frequent comment response related to *citywide impacts*.

Scarlett, Jennifer-23

1. Comment on traffic and air quality in South Park.

Please see comment response Scarlett, Jennifer-4.

Scarlett, Jennifer-24

1. The EIS should state the reason that the proposal includes changes to the Comprehensive Plan.

Comment noted. Please see Appendix F, which describes the proposed amendments to the Neighborhood Plan element of the Comprehensive Plan.

Scarlett, Jennifer-25

1. The Aesthetics analysis does not consider impacts of light and glare from taller buildings.

Thank you for your comment. The EIS scope focuses on elements of the environment most likely to be impacted. Existing regulations controlling light and glare would apply to new construction, and would apply under any of the alternatives. The incrementally larger scale of buildings that could occur on any given development site in the action alternatives compared to no action, would not be expected to produce significantly more light or glare compared to the building that could be built under no action, in scenarios where allowed uses are not altered. As discussed in the Land Use Section 3.2.2 Impacts, additional impacts could result in cases where the action alternative would allow for an intensification of allowed land use. In these cases, a greater impact on neighboring properties due to increased light and glare could occur, and that greater impact is considered as part of a land use impact identified as a significant impact in some cases. See Section 3.2 Land Use.

Scarlett, Jennifer-26

1. Concern about the use of park land.

Comment noted. Please see the frequent comment response related to *opposing policy changes for use of natural parks lands*.

Scarlett, Jennifer-27

1. Concern about adequacy of outreach regarding MHA

Please see frequent comment response concerning *Community engagement*.

Schauer, Bruce

1. Concern there is already enough multifamily zoned land, apply MHA in areas already multifamily

Please frequent comment responses concerning *Alternatives to MHA that could achieve objectives and MHA affordable housing requirements*.

2. Interest in residential commercial zoning in a particular area be considered

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix H Zoning Maps.

The area discussed is proposed for Neighborhood Commercial (NC) inside the Aurora-Licton Springs urban village.

3. Concern about a particular half block changing from single family to LR1, citing character and community connections

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix H Zoning Maps.

The area discussed is proposed for Residential Small Lot (RSL) zoning in the FEIS preferred alternative.

Scherer, Sharon V

1. Concern about historic resources and loss of cultural diversity and architectural character

Please see EIS Chapter 3.5 Historic Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Analysis of historic resources*.

Please also see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures.

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning Impacts on racial and cultural minority groups and Displacement analysis.

2. Recommends a program for transfer of development rights for certain buildings, and consider development in lower density places served by transit

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix C MHA Implementation Principles, which include “Ensure MHA program creates affordable housing opportunities throughout the city” and “Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.” Locating more housing near transit and amenity-rich areas helps meet goals for reducing car trips and increasing transit use, which support climate mitigation, equity, and livability goals.

Please also see frequent comment response concerning *Alternatives to MHA that could achieve objectives*.

Schletty, Mark

1. Commenter prefers Alternative 1, payment is too low, concern about segregation by income

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

Please see frequent comment response concerning *MHA affordable housing requirements* and *Location of MHA housing units*. Note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

2. Concern about parking and transit

Please see frequent comment response concerning *Impacts to parking*. Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

3. Concern about displacement

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural*

minority groups and Displacement analysis. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

4. MHA performance should be required and should serve lower incomes than the proposal

Please see frequent comment response concerning *MHA affordable housing requirements* and *Location of MHA housing units*. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock, which serves incomes 0-80% AMI.

5. Concern about congestion

Please see response to comment #2 above.

6. Concern that the EIS conducted by the same City department as that which is making the proposal is a conflict of interest

Please see SEPA rules regarding the lead agency for environmental analysis. “If an agency is proposing a project or nonproject action, that agency is lead agency under SEPA... The lead agency is the agency responsible for all procedural aspects of SEPA compliance.”

Please see SEPA handbook Frequently Asked Questions:
<http://www.ecy.wa.gov/programs/sea/sepa/handbk/hbappa.html>

7. Request to forward comment to Councilmember Herbold

Comment forwarded to Councilmember Herbold on Thursday 10/19/2017.

Schugurensky, Pablo

1. Commenter does not support Roosevelt urban village expansion east of 15th Ave NE.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see discussion of urban village boundary expansion areas identified in the Seattle 2035 Comprehensive Planning process.

2. Commenter conveys disappointment about process

Please see frequent comment response concerning *Community engagement*. Please also see EIS Appendix B for a discussion of the MHA community input process and a summary of input received, as well as proposed zone changes guided by community input.

Schweinberger, Sylvia

1. Multiple concerns

Please see comment responses to Anonymous 20 – Anonymous 28.

Scott, Gunner

1. Concern about access to transit, condition of infrastructure including streets, sidewalks

Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as Relevant Plans and Policies, which includes “New sidewalks, particularly near schools” as part of the City of Seattle 2017–2022 Transportation Capital Improvement Program.

Also note that new development inside urban villages requires sidewalks in many cases.

2. Concern about lack of family-friendly units and displacement, MHA payment requirements are too low

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle’s single family zoned land.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, which include family-size housing types such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas, allows for more family-size and family-style housing in areas that are currently zoned single family.

Note also that the proposal includes family-size unit requirements for both market rate and affordable housing performance. Also note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

Please also see frequent comment response concerning *MHA affordable housing requirements* and *Location of MHA housing units*.

3. Concern about displacement, family-size housing, and MHA payment levels

Please see response to comment #2 above.

4. Concern about public transit service

Please see Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as Relevant Plans and Policies, which includes “New sidewalks, particularly near schools” as part of the City of Seattle 2017–2022 Transportation Capital Improvement Program.

5. Concern about infrastructure and resources in Highland Park and Delridge, school performance, traffic, lack of sidewalks, transit service

Please see Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as Relevant Plans and Policies, which includes “New sidewalks, particularly near schools” as part of the City of Seattle 2017–2022 Transportation Capital Improvement Program.

Please see frequent comment response concerning *Impacts to Seattle Public School capacity*.

6. Commenter shares information about demographics in Westwood/Highland Park

Thank you for providing this context.

7. Concern about continued effects of redlining in Westwood/Highland Park, density impacts to area in the absence of an infrastructure improvement plan

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

8. Concern about lack of plan for increasing open space

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures, including updates to Incorporated Plan Elements.

9. Adding density will exacerbate air pollution conditions

Please see EIS Chapter 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures.

Seffernick, Ashley

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Sellars, Matt

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Selznick, Ann

1. DEIS does not include a broad range of action alternatives

Please frequent comment response concerning *Alternatives to MHA that could achieve objectives*.

2. The displacement and opportunity typology is flawed

Please see frequent comment response concerning *Displacement Risk Access to Opportunity Typology*.

3. Urban village displacement risk should be evaluated based on impacts of proposal

Please see frequent comment response concerning *Displacement Risk Access to Opportunity Typology*. Furthermore, the existing typology is integral to the policy proposal, for which impacts are assessed in the EIS. The EIS is not an assessment of the typology itself.

4. Displacement risk only considered buildings with 20 or more units

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

5. EIS should evaluate impacts of zone changes from residential to commercial

As described in Frequent Comment Topic A, “Individual Urban Village Review,” the DEIS is a programmatic document designed to assess impacts at a citywide scale. Detailed evaluation of effects of

planning-level alternatives in specific locations would depend on site-specific information not yet available, such as building footprints, heights, and locations. Evaluation of these impacts is best done at the project level through site-level SEPA review or the building permit process, as described on page 3.165.

Please see FEIS Chapter 2.0 Description of the Proposal and Alternatives. The preferred alternative for the Crown Hill urban village does not include proposed zone changes from single family to neighborhood commercial.

6. EIS does not account for development typical of LR zones in Crown Hill

Please see frequent comment response concerning *Individual urban village review*.

7. EIS does not acknowledge inequity between urban villages with and without light rail

Please see Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as Relevant Plans and Policies.

8. Concern about public school capacity

Please see frequent comment response concerning *Impacts to Seattle Public School capacity*.

Sewell, Linda

1. EIS does not consider impact development has on affordability when replacing existing inventory.

Comment noted. Please See section 3.1 Housing and Socioeconomics for discussion of displacement including direct, economic and cultural displacement. Quantities for number of demolished housing units and displaced low-income households are provided for each alternative.

2. The MHA payment option does nothing to increase the affordable housing for low and middle income families.

Comment noted. Please see frequent comment response concerning location of affordable housing units.

3. Small homes have been replaced with expensive townhouses in Wallingford in recent years. MHA would amplify this.

Comment noted. Please note that there is not currently an affordable housing requirement for new development in Wallingford. MHA implementation would require a contribution towards affordable housing as part of new development. Please also see information in Section 3.1 Housing and Socioeconomics concerning housing affordability by age of housing and other housing characteristics.

Sherman, Kim

1. Concern about displacement, gentrification, and changing demographics

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

2. Concern about loss of affordable houses and affordable housing units

Please see response to comment #1 above as well as the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses payment dollars to fund acquisition and rehabilitation of existing housing.

Note that in the absence of an affordable housing requirement, observed conditions may continue. Please refer to impacts of the No Action Alternative for a comparison of housing affordability and displacement between the No Action and Action Alternatives.

MHA is an affordable housing program that would require contributions to affordable housing in the study area, where no requirement exists today.

3. Concern that new housing does not serve low-income populations

Please see frequent comment response concerning *MHA affordable housing requirements* and *Location of MHA housing units*. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock, which serves incomes 0-80% AMI.

4. Concern about insufficiency of affordability requirements, duration

Please see comment responses above, and note that required duration of affordability is 75 years for performance, and indefinite for housing funded with payment dollars.

5. Concern about loss of character and gentrification

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures. Please also see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

Shifley, Sarah

1. **Implement MHA with an LR1 designation in the area of Columbia City on 33rd, 34th, and 35th Ave S between Oregon and Alaska.**

Thank you for your comment, and for the time and effort to convene neighbors to discuss the MHA proposal and provide input to the City. Comments are noted. Please see the Preferred Alternative map for the Columbia City Urban Village in Appendix H, which would include the LR1 zone for the area that is the subject of your comment.

2. **If upzones are implemented to in our area, please also expand the urban village one block to the north.**

Comment noted. Urban village expansions to an approximate 10-minute walkshed from frequent transit are studied in the EIS for areas that were reviewed in the Seattle 2035 comprehensive planning process. The blocks described in the comment are outside of the estimated 10-minute walkshed and are not included in the study area.

3. **If upzones are implemented in our area, please also expand the urban village one block to the north.**

Comment noted. Urban village expansions to an approximate 10-minute walkshed from frequent transit are studied

4. **If upzones for MHA are implemented changes for public safety including sidewalks, crosswalks and speed bumps are needed in the area**

Comment noted. Please discussion in Section 3.4 Transportation including pedestrian safety.

Shifley, Sarah & Hedlund, Tyrell

1. **Commenters request that Columbia City not have zone changes, but LR1 if zone changes do occur, concern about diversity and low-income residents**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Zone changes for the area identified by commenter are shown in EIS Appendix H Zoning Maps. The proposal recommends zone changes from Single Family to Lowrise 1.

2. **Concern about traffic and parking, loss of low- and moderate-income housing, displacement, loss of tree canopy, police and public safety, air quality, transitions from existing multifamily housing**

Please see Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

Please see frequent comment response concerning *Impacts to parking*.

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning Impacts on tree canopy.

Please see DEIS Chapter 3.8 concerning Public Services and Utilities: “demand on fire and emergency services would be identified and managed as the project is implemented” and “impacts on fire and emergency services as a result of demand increases would be identified and managed during the project approval process.”

Please see EIS Chapter 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures.

Please also see EIS Appendix C MHA Implementation Principles, which include:

“3. Transitions: Plan for transitions between higher- and lower-scale zones as additional development capacity is accommodated. a. Zone full blocks instead of partial blocks in order to soften transitions. b. Consider using low-rise zones to help transition between single-family and commercial / mixed-use zones. c. Use building setback requirements to create step-downs between commercial and mixed-use zones and other zones.”

3. Request that zone changes be implemented one block north of Oregon between 33rd and 35th in Columbia City citing need for sidewalks

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Zone changes for the area identified by commenter are shown in EIS Appendix H Zoning Maps. The proposal does not include expansion of the urban village boundary as described in this comment nor the zone changes requested.

4. Request that affordable housing remain in Columbia City

Please see frequent comment response concerning *MHA affordable housing requirements* and *Location of MHA housing units*. Note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

5. Request for infrastructure improvements in the event of a zone change

Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as Relevant Plans and Policies, which includes “New sidewalks, particularly near schools” as part of the City of Seattle 2017–2022 Transportation Capital Improvement Program.

Please also see EIS Chapter 3.3 Aesthetics for discussion of development standards including required setbacks, as well as the Design Review Program and other mitigation measures.

Showalter, Whitney

1. The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

Siegfriedt, Sarajane-1

1. Comments concerning parking and the difficulty of reducing car ownership. Return to requiring some parking in multifamily development with a goal of preserving street parking.

Thank you for your comments. Comments noted. Please see frequent comment response concerning parking impacts and mitigations.

Siegfriedt, Sarajane-2

1. Remove the criterion about physical access to higher education as a factor in the access to opportunity typology.

Thank you for your comments. Comments noted. Please see comment response to Pollet, Gerry, comment 3.

2. Remove test scores at local schools as a criterion in the access to opportunity typology.

Thank you for your comments. Comments noted. Please see comment response to Pollet, Gerry, comment 3.

3. The EIS should include analysis of school capacity using Seattle Public Schools (SPS) data. There should be additional mitigation to address school capacity constraints.

Comments noted. See also frequent comment response regarding school capacity. Please see additional analysis in the FEIS in Section 3.8 concerning school capacity constraints. Since the DEIS, the City and Seattle Public Schools (SPS) held additional discussion and coordination related to school enrollment and school capacity.

Data provided by SPS are used in the FEIS to estimate an enrollment to capacity ratio for each school service area. Data from SPS are included in a new Appendix N. SPS data are used to identify student generation ratios from net new housing. In the impacts section, potential additional students from incremental growth that could occur due to implementation of the Preferred Alternative is estimated. The FEIS also includes additional discussion of mitigation measures for potential impacts to public schools. Please see also response to Pollet, Gerry, comment 4.

Siegfriedt, Sarajane-3

1. Lake City should not be classified as a Hub Urban Village (HUB).

Thank you for your comments. Please refer to the Seattle 2035 Comprehensive Plan for description of designation of urban villages as Hub or Residential.

2. Please update data for Lake City.

Thank you for your comments. The most recent available data for transportation modelling and housing and socioeconomics, are included in the EIS to analyze impacts of the alternatives.

2. The City needs to invest in Lake City in order to draw people there.

Thank you for your comments. Comments noted.

Siegfriedt, Sarajane-4

1. There is no policy to encourage family-sized housing.

Thank you for your comments. Please see frequent comment response concerning family-friendly housing.

Sievers, Ron

1. Commenter supports implementation of Alternative 2

Thank you for your comment. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

2. Concern that single family to RSL is not enough density, zone changes should be single family to LR1, LR2, or LR3

Thank you for your comment. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix H Zoning Maps.

Silverman, Jeff

1. Discussion of bus timing, frequency, and suggestions for improving data collection and analysis

Thank you for your comment. Your comment is noted. Please see EIS Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

Simons, Lucas

1. Commenter supports more density overall and especially around light rail and bus line crossings

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

2. Concern about assumptions of displacement and access to opportunity

Please see frequent comment response concerning *Displacement Risk Access to Opportunity Typology*.

3. Consider inclusive development opportunities such as Liberty Bank site

Please see frequent comment response concerning *MHA affordable housing requirements* and *Location of MHA housing units*. Note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

Singer, Glen

1. EIS should address urban villages individually.

Please see frequent comment response concerning Individual Urban Village Review.

2. The EIS does not adequately address the city as a whole.

Please see frequent comment response concerning Citywide Impacts to the City as a Whole.

Skurdal, Aric

1. **Commenter supports Alternative 3 for Lake City Urban Village, suggests modest height increases, does not support 145' height limits in the urban village**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Zone changes for the area identified by commenter are shown in EIS Appendix H Zoning Maps.

There are no 145' height limits proposed for the Lake City Urban Village.

Smilanich, Tamra

1. **The EIS should contain more alternatives.**

Comment noted. Please see frequent comment response concerning alternatives that could meet objectives. Please see also Section 2.4 alternatives considered but not included for detailed analysis.

2. **Concerns about loss of open space and aesthetic impacts**

Thank you for your comments. Please see Section 3.3 aesthetics and Section 3.7 Open Space and Recreation for discussion of impacts for each alternative.

3. **Quantity of vacant units should be considered as a part of the strategy to provide rent and income restricted units.**

Comment noted. Discussion of the vacancy rate and its relationship with housing prices, is included in Section 3.1 Housing and Socioeconomics.

4. **The balance between renter rights and property owner rights is off.**

Comments noted.

5. **Consider the impact on property taxes.**

Comment noted. Please see additional discussion in the FEIS section 3.1.2 impacts, of impacts of property tax increases on homeowners.

5. **Consider the impact on property taxes.**

Comment noted. Please see additional discussion in the FEIS section 3.1.2 impacts, of impacts of property tax increases on homeowners.

6. **Alternative 3 is a good option for Southeast Seattle.**

Comment noted, thank you.

Smith, Gerry

1. **Supports comments and conclusions of the Madison Miller Park Community Group.**

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

2. **Housing on the east side of 18th Ave. in Madison Miller should be restricted to 3 stories high.**

Comment noted. Please see the Preferred Alternative map for the Madison Miller urban village at Appendix H. Under the Preferred Alternative the east frontage of 18th Ave. in the north portion of the urban village would have LR1 zoning with a 30 foot height limit.

Smith, Randy

1. **Graphics in the aesthetics chapter do not accurately depict potential new structures.**

Please see comment response to Bricklin, David comment 6.

2. **West Seattle Junction traffic analysis is not correct**

Please see comment response to Tobin-Presser, Christy-3.

3. **West Seattle Junction is not meeting standards for open space and analysis and mitigation are inadequate**

This is a programmatic DEIS addressing area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects required are also unknown. Individual development projects will undergo separate and more detailed SEPA review; including open space analysis, and specific mitigation will be determined at that time.

Please see EIS chapters 3.3 Aesthetics and 3.7 Open Space and Recreation for discussion of impacts and mitigation measures.

Smith-Bates, Jacqui

1. **EIS should address urban villages individually.**

Please see frequent comment response concerning Individual Urban Village Review.

2. **The EIS does not adequately address the city as a whole.**

Please see frequent comment response concerning Citywide Impacts to the City as a Whole.

Smits, Jessica

1. **Concern about Seattle Public Schools capacity. School capacity analysis should be included in the EIS.**

Thank you for your comments. Please see frequent comment response concerning school capacity. Please also see response to Pollet, Gerry.

Soper, Susan

1. **Look into how Denver dealt with the options for developers to provide affordable housing through payment or performance.**

Thank you for your comments. Please see frequent comment response concerning location of MHA affordable housing units.

Spencer, Patricia

1. **Supports comments and conclusions of the Madison Miller Park Community Group.**

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Spengler, Dan

1. **Extend the DEIS comment period.**

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Spengler, Tamsen

1. **Extend the DEIS comment period.**

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Spotswood, Marilyn

1. **Commenter supports the No Action Alternative, citing concern about land consolidation and increasing ownership by corporations**

Thank you for your comment. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes

description of the preferred alternative and methodology for proposed zone changes.

2. The DEIS needs to analyze urban villages individually

Please see frequent comment response concerning *Individual urban village review*.

3. The DEIS does not address citywide impacts combined with other SEPA analysis

Please see frequent comment responses concerning *Citywide impacts* and *Cumulative impacts*.

Stacy-1

1. EIS does not account for historic growth trends

Growth estimates in the EIS rely on the Seattle 2035 Comprehensive Plan. P. 473 of the Comprehensive Plan Housing Appendix discusses growth data from the 2000 census forward.

“Broad Trends in Seattle’s Population and Households: This section summarizes recent trends in the basic characteristics of Seattle’s population and households, using estimates from the 2000 and 2010 censuses and the most recent three-year tabulation of ACS data spanning 2011 to 2013.”

Please see the Comprehensive Plan Housing Appendix p. 473 for more detail.

Stacy-2

1. The No Action Alternative was not sufficiently analyzed for development capacity to meet Comprehensive Plan growth goals

Please frequent comment response concerning *Alternatives to MHA that could achieve objectives*.

Stacy-3

1. Concern about inadequate mitigation measures for livability and neighborhood character

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures. Note recent City Council-approved changes to the Design Review program which include new thresholds for areas proposed to change from single family to lowrise with MHA implementation.

Stacy-4

1. Concern about impacts on Seattle Public Schools

Please see frequent comment response concerning *Impacts to Seattle Public School capacity*.

Standish, Dana

1. The EIS is confusing and not accessible.

Comment noted. The scope of the proposal is large. A hard copy was available at the Central Public Library, and hard copies were available for purchase. Please see the summary of community engagement at Appendix B for an overview of other outreach to community members that provided opportunities for providing input.

2. Cumulative environmental effects have not adequately been taken into consideration.

Thank you for your comment. Comment noted. Please see frequent comment response concerning cumulative impacts. Please see frequent comment response concerning individual urban village review.

3. There is no consideration for maintaining the historic character of Seattle's neighborhoods.

Thank you for your comment. Please see Section 3.5 Historic Resources. Please see also response to Woo, Eugenia.

4. Focus density around the Roosevelt light rail station and do not expand the urban village boundary to include lands east of 15th Ave. Preserve the integrity of single family areas in the Ravenna neighborhood.

Thank you for your comment. Comment noted. Please see the Preferred Alternative maps at Appendix H for

5. The EIS does not take into consideration the impact of abrupt land use transitions on livability.

Thank you for your comment. Please see discussion in Sections 3.2 Land Use, and Section 3.3 Aesthetics.

Stark, Korina

1. Supports comments and conclusions of the Madison Miller Park Community Group.

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Steiner, Brad

1. **Expresses strong support for the Roosevelt Urban Village expansion and implementation of MHA in a way that provides balance of density throughout the neighborhood.**

Thank you for your comment. Comment noted. Please see the Preferred Alternative map for the urban village at Appendix H.

Stelling, Deanna

1. **The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.**

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

Stelling, Tim

1. **The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.**

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

Stewart, John

1. **I would like to see the no action options.**

Please see description in Chapter 2. If referring to the no action option for mapping, please note that each zone designation is labelled with both the existing zone and the zone proposed in the action alternative. Please note that an interactive map which can be zoomed in, is available online with the EIS documents.

2. **I would like to see the correct Ravenna urban village boundary.**

Please note that certain areas were addressed in the University District urban design framework and EIS. These areas are not included for study in this EIS.

3. **Project level SEPA review will not provide a review path for projects.**

Comment noted. All actions that exceed SEPA review thresholds will receive project level SEPA review. This includes many multi-family, mixed-use, and commercial developments that would occur in the study area.

4. Historic resources analysis is inadequate. Provide mitigation including historic resources surveys.

Comment noted. Please see frequent comment response concerning historic resources, and comment response to Woo, Eugenia.

Stoker, Melissa

1. EIS should address urban villages individually.

Please see frequent comment response concerning Individual Urban Village Review.

2. The EIS does not adequately address the city as a whole.

Please see frequent comment response concerning Citywide Impacts to the City as a Whole.

Stone, Stephanie

2. Commenter supports proposed action

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

3. Concern about displacement, commenter requests affordable housing be built in the Madison-Miller neighborhood

Please see frequent comment response concerning *MHA affordable housing requirements* and *Location of MHA housing units*. Note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

4. Supports making transit investments

Please see Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

5. Request to have City purchase Republican P-Patch, citing need to preserve green space

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures. Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

6. Concern for tree canopy

Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

7. Desire for more bike racks

Please see Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

8. Concern for historic resources

Please see EIS Chapter 3.5 Historic Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Analysis of historic resources*.

9. Concern for tree canopy

Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

10. Request for more sports fields

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures.

11. Request for impact fees

The proposal is aimed at providing additional affordable housing so the City intends to pursue mitigation measures that will alleviate impacts while still achieving the goal of improved housing affordability. Nothing in this proposal impedes the ability of the City to pursue implementation of an impact fee program.

12. Concern for trees and reducing parking and traffic

Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

Sullivan, Megan

4. Concern about lack of parking at Beacon Crossing

Thank you for your comment. Your comment is noted, however it is not specific to the proposal and its environmental analyses and therefore no response is provided.

Sunidja, Aditya

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Sureddin, Paul

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Szabo, Tyler

6. Model lacks consideration of commercial amenities such as grocery stores

The proposal is aimed at providing additional affordable housing so the City intends to pursue mitigation measures that will alleviate impacts while still achieving the goal of improved housing affordability. Nothing in this proposal impedes the ability of the City to pursue complementary goals such as encouragement of grocery stores.

Taylor, Patrick

1. Commenter recommends hybrid of Alternatives 2 and 3, with recommendations for multiple urban villages, particularly more housing near transit and in high opportunity areas

Thank you for your comment. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Zone changes for the areas identified by commenter are shown in EIS Appendix H Zoning Maps.

2. Concern for displacement, recommends additional policies

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see mitigation measures in this section for discussion of additional policies addressing housing affordability. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

Please also see EIS Chapter 3.1 Housing and Socioeconomics as well as the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for

information about how the Seattle Office of Housing uses payment dollars to fund acquisition and rehabilitation of existing housing.

3. Large and small scale buildings can exist together

Thank you for your comment. Your comment is noted.

4. Support capacity increases near transit citing livability benefits

Thank you for your comment. Your comment is noted.

5. Regional biological resources will be better off with more housing in the city

Thank you for your comment. Your comment is noted.

6. More housing will allow for less driving and lower greenhouse gas footprint

Thank you for your comment. Your comment is noted.

Terjeson, Shawn

2. Need to see impacts at block and street level, West Seattle Junction should get its own EIS

Please see frequent comment response concerning *Individual urban village review*.

3. West Seattle Junction single family areas are protected by the neighborhood plan

Please see response to Barker, Deb comment concerning Neighborhood Plan Conflicts.

4. West Seattle Junction traffic analysis is flawed

Please see response to Tobin-Presser, Christy-3.

5. Tree canopy area in West Seattle Junction is incorrect

Please see EIS Chapter 3.6 Biological Resources for discussion of analysis methodology as well as impacts and mitigation measures. Please also see frequent comment response concerning *Impacts on tree canopy*.

6. Concern about West Seattle Junction park and open space shortage, no mitigation is proposed, and recommends impact fees and open space design standards and incentives

Please see EIS Chapter 3.7 Open Space and Recreation including expanded discussion of mitigation measures for impacts to Open Space and Recreation in the FEIS.

7. Concern about sanitary sewer and stormwater infrastructure

Please see frequent comment responses concerning *Impacts to sanitary sewer systems* and *Impacts to Stormwater Infrastructure*.

Terjeson, Shawn

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Turjeson, Susan

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Thaler, Toby

1. Preparation of a Final EIS

Thank you for the comment. The cited section of the SEPA Rules (WAC 197-11-400) is a general statement of purpose that addresses EIS documents and SEPA procedures. The provision also uses language that alternatively *requires* or *encourages* certain actions. The subsection cited in the comment encourages but does not require that the EIS process be used to resolve concerns and problems prior to issuance of a final document. The MHA process has been designed to discuss and address concerns and problems, to the extent that is possible for a challenging and contentious issue in the City of Seattle, such as affordability of housing. The extensive outreach efforts conducted for the MHA proposal are summarized in Chapter 2 of this document, and Appendix B. The Final EIS responds to impacts identified in the Draft EIS and the concerns expressed in review comments in part through the identification and discussion of an additional alternative. The Final EIS is part of the process, although not the conclusion of the process, that the City is using to implement Comprehensive Plan policy for affordable housing. In the final analysis, the City is following its adopted SEPA procedures, consistent with the WAC and Land Use Code, and is using SEPA to attempt to resolve conflicts. While the language of the SEPA Rules may encourage or suggest a sequence of events in the process of resolving concerns, the City has the discretion to use the Final EIS differently in the context of a broader, continuing legislative decision making process.

2. The DEIS fails to accurately describe the City's decision making process

The comment is noted. The Fact Sheet, Chapter 1 and Chapter 2 of the Final EIS identify that the City has been following a process of phased environmental review for actions related to the 2035 Comprehensive Plan; refer to Section 2.4 of the 2035 Comprehensive Plan EIS, which has been adopted by MHA for purposes of SEPA compliance. It should be noted that the 2035

Comprehensive Plan EIS initiated a course of phased review and MHA is an implementation action and a subsequent step in that course of review. Although the MHA action is non-project in nature, the MHA EIS is more detailed and specific than the 2035 Comprehensive Plan EIS, and the resulting sequence of documents is consistent with the requirements for phased review.

3. The DEIS fails to accurately describe the City's decision making process

See frequent comment response Alternatives to MHA that could achieve objectives.

4. The DEIS fails to properly evaluate impacts on individual communities

Please see the response to comment No. 2 above regarding phased environmental review. The MHA EIS is more specific and detailed than the 2035 Comprehensive Plan EIS which preceded it and is adopted for purposes of SEPA compliance. The MHA EIS is a programmatic document, however, and is subject to limitations in the SEPA Rules regarding such documents: they are not required to perform site-specific studies or analyses. Within that framework, the EIS evaluates impacts for individual urban centers and villages, which is consistent with the focus of the Comprehensive Plan. Whether recent City planning efforts have tended to focus more on planning for transit and urban centers and villages as distinguished from neighborhood plans, is not a relevant topic for discussion in the MHA EIS.

5. Other policies and programs to mitigate for possible adverse impacts is unwarranted

The comment regarding mitigation programs is acknowledged.

6. Public engagement.

The comment is acknowledged. Please refer to the response to comment No. 4 above, and Appendix B to the DEIS. Please also see frequent comment response regarding community engagement.

7. Previous comments from August of 2016 regarding Council Bill 118736, which established a framework for mandatory housing affordability for residential development.

Comments noted.

Thomas, Rutha

1. Requests rezoning from single family to a multifamily zoning on the north side of NW Market St. in the 3200 block. (Signed jointly by 5 homeowners)

Thank you for your comments. Because the area is outside of the urban village boundary, under the Preferred Alternative no change to the existing single-family zoning is proposed. MHA implementation is proposed for areas within urban villages and on existing commercial and multi-family zoned lands.

Thompson, Gayle

1. **Supports comments and conclusions of the Madison Miller Park Community Group.**

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

2. **Concern about displacement that is currently taking place.**

Comments noted. Please see discussion of direct, economic and cultural displacement in Section 3.1 Housing and Socioeconomics.

3. **The performance option would result in the city funding concentrations of affordable housing in less expensive neighborhoods like Lake City.**

Comment noted. Please see frequent comment response concerning location of MHA affordable housing units.

Thomson, John

1. **Large development should include incentives to contribute to accessible green space such as parks or p-patches**

Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*. Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures, including Incorporated Plan Elements. Note that multifamily development requires amenity area for residents as well as landscaping through the City's Green Factor program.

2. **Concern there are not enough home ownership options being developed**

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle's single family zoned land.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, which include family-size housing types such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas, allows for more family-size and family-style housing in areas that are currently zoned single family.

Note also that the proposal includes family-size unit requirements for both market rate and affordable housing performance. Also note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial](#)

[Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

3. Large development should include incentives to contribute to accessible green space such as parks or p-patches

Please see response to comment #1 above.

Thon, Wendy

1. Concern that proposed MHA implementation in the block of 42nd Ave SW between Heights and Holly would create a divide of the neighborhood.

Thank you for your comments. Please see the Preferred Alternative map for the area at Appendix H. The existing urban village boundary follows the 42nd Ave. SW right of way. The east side of the block under the preferred alternative would have MHA implementation with the Residential Small Lot (RSL) zoning designation. Please see description of RSL at Appendix F. RSL is a version of a single family zone, and the height limit is the same as the Single Family 5000 zone.

2. Parking needs to be provided as a part of new development.

Thank you for your comments. Comment noted.

3. The proposal will not satisfy the need for affordable housing.

Thank you for your comment. Please see discussion in Section 3.1 Housing and Socioeconomics.

4. The proposal could cause existing apartment buildings to be redeveloped.

Thank you for your comment. Please see discussion of direct, economic and cultural displacement in Section 3.1 Housing and Socioeconomics.

5. How many affordable units would the proposal generate?

See discussion in Section 3.1 Housing and Socioeconomics. It is estimated that the proposed action would lead to construction of 7,417 rent and income restricted housing units in the study area.

6. Expresses support for incentives to protect existing housing, and thoughtful design similar to High Point.

Comments noted.

Thoreen, Kari

- 1. The comment document requests completion of an EIS pertaining to just the South Park neighborhood. The comment document notes that South Park has serious environmental issues, and expresses concern about notice and public engagement.**

Comments noted. Thank you for your comment. Please see frequent comment responses concerning individual urban village review and community engagement. Please see also Appendix B. Please see the Preferred Alternative map at Appendix H for South Park. In recognition of constraints in South Park, the minimum zoning changes necessary to implement MHA are proposed for the South Park area. This approach is consistent with the approach proposed for areas outside of urban villages under the action alternatives.

Tobin-Presser, Christy-1

- 1. Extend the DEIS comment period.**

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Tobin-Presser, Christy-3 (JnNO Land Use Committee)

Please note that a comment originally titled Tobin-Presser, Christy-2 was retitled to Presser, Brian.

Due to the larger number of individual comments within the letter, the response is divided into topic areas with numbering for each section of the letter to index the comments.

General Comments (GC)

- GC-1.** Please see response to frequent comment regarding community engagement. The Seattle Land Use Code does not require Individual notice for legislative actions, such as area-wide rezones and amendments to the text of the land use code; please refer to SMC 23.76.062. Similarly, the City's SEPA ordinance does not require individual notice; please refer to SMC 25.05.360 and 25.05.510.
- GC-2.** The EIS is city-wide in scale and programmatic in its level of analysis. A programmatic EIS for a legislative action of broad scale cannot, and is not required to, perform site specific or "block-level" analysis for individual urban villages; please refer to WAC 197-11-442 and the frequent comment response concerning individual urban village review. Detailed analysis, at the block level and site level, will occur during review of applications for specific project proposals by the Department of Construction and Inspections. Identification of impacts for

individual urban villages is included in the EIS where possible, given the broad scale of the proposal.

This is a programmatic DEIS addressing area-wide land use zoning changes, rather than a project-specific proposal. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects required are also unknown. Individual development projects will undergo separate and more detailed SEPA review; including traffic impact analysis, and specific mitigation will be determined at that time.

The metrics used to identify transportation impacts were screenlines, mode share, and total transit boardings. Pedestrian & bicycle, safety, and parking were also examined at a higher level. As stated in Exhibit 3.4-49, there is a parking impact identified for all three alternatives.

GC-3. Please refer to the previous response. Please see frequent comment response regarding cumulative impacts. Regarding transportation, the 2035 modelling scenarios assumed a transportation network that included planned projects that would be complete by the 2035 horizon year including the SR 99 tunnel and Sound Transit Link light rail extension, among others. The City will continue to plan for the projects the commenter cites, identifying mitigation as appropriate at the project level. As stated above, individual projects undergo a separate and more detailed SEPA review, which identify impacts during construction and specific mitigation measures. SEPA requires an existing condition and future condition analysis; the request for annual analysis is not required by SEPA. However, the City regularly monitors parking occupancy and responds to citizen requests for restricted parking zone changes and extensions, including developing new zones if warranted.

GC-4. EIS Alternative 1/No Action assumes that the City would not implement MHA; this information discloses to decision makers the environmental consequences – positive and negative -- of delaying action. In addition, Section 1.7 of the EIS discusses the pros and cons of delaying action on the proposal. In view of this information, it is unnecessary and would be redundant to also identify such measures as mitigation.

It should be noted that MHA is an implementation program that would operate within the framework of the 2035 Comprehensive Plan; it is not in itself a substitute for the Comprehensive Plan and does not replace city procedures for providing services and facilities city-wide or in any sub-area. The Draft EIS, in Section 3.8.3 explicitly references and incorporates mitigation measures recommended in the 2035 Comprehensive Plan EIS that address areas experiencing public service deficiencies. In addition, the MHA adopts the 2035 Comprehensive Plan EIS for purposes of environmental review.

The proposal is aimed at providing additional affordable housing so the City intends to pursue mitigation measures that will alleviate impacts while still achieving the goal of improved housing affordability. Nothing in this proposal impedes the ability of the City to pursue implementation of an impact fee program.

Please see mitigations measures in Sections 3.4 Transportation, 3.7 Open Space and Recreation, and 3.8 Public Services and Utilities for discussion of the potential for impact fees as mitigation.

- GC-5.** The comment's disagreement with the conclusions of the opportunity and risk analysis as it applies to the West Seattle Junction is acknowledged. Please see the frequent comment response concerning the displacement risk and access to opportunity typology.

The methodology for analyzing displacement risk is based on the *Growth & Equity Analysis* that the City originally prepared to support city policy for equitable development and for updating the Comprehensive Plan. The MHA EIS used, but did not create or modify, the typology of displacement risk and opportunity areas. That typology is believed to be a reasonable tool for assessing housing and socioeconomic impacts. Please refer to the updated analysis of direct, economic and cultural displacement included in Chapter 3.1 of the Final EIS. The Draft EIS identifies the potential displacement irrespective of the economic, social, cultural or racial categories affected; please refer to DEIS Exhibit 3.1-38 and Appendix G. Other elements of the comment, concerning displacement of families with children and the elderly, are acknowledged.

- GC-6.** The preference for different alternatives is noted. Please see frequent comment response concerning alternatives that could achieve the objective.

Housing & Socioeconomics (HS)

- HS-1.** Exhibit 3.1-19 on page 3.21 of the DEIS presents the best available data on the cost of Seattle's unsubsidized rental housing stock by affordability level based on a Fall 2016 rental market survey. It indicates that the current supply of housing that is affordable to low-income households is very small. This applies to both larger apartments complexes (20 units or more) as well as smaller complexes (4-19 units).

Exhibit 3.1-39 on page 3.56 of the DEIS presents estimates of the number of physically displaced low-income households (50 percent of AMI or less) by alternative and compares this to the estimated number of new affordable units to be built. Estimates of the total number of demolished units that are not already permitted are presented in Exhibit 3.1-38 on page 3.55.

As this is a programmatic EIS, it does not include a detailed parcel-by-parcel assessment of the current affordability of unsubsidized units susceptible to redevelopment. See also frequent comment response concerning individual urban village review. The DEIS does discuss current economic pressures that are shaping the cost of unsubsidized housing in units throughout the city. Please see also responses to Fox, John.

- HS-2.** Please refer to the response to GC-2, WAC 197-11-442 and the frequent comment response concerning individual urban village review, regarding the level of detail for a programmatic EIS.

- HS-3.** Current Comprehensive Plan designations for the study area are identified on Draft EIS Exhibit 3.2-1, and existing land uses are identified on Exhibit 3.2-2. Critical areas are identified in DEIS Exhibits 3.6-3, 3.6-4, 3.6-9 and 3.6-10.
- HS-4.** See HS-2 above.
- HS-5.** Please see analysis of direct, cultural and economic displacement in Section 3.1 Housing and Socioeconomics. See FEIS Exhibit 3.1-41 for estimation of the number of demolished units.
- HS-6.** See Section 3.1.3 Mitigation Measures in Housing and Socioeconomics.
- HS-7.** The proposal is an implementation program that is responsive to the goals and policies of the 2035 Comprehensive Plan. The proposal and EIS alternatives have been developed within the context of the Comprehensive Plan's Urban Village Strategy, which is discussed in Section 3.2.1 of the Draft EIS, and are consistent with that strategy. Similarly, the growth estimates used as the basis for the alternatives are consistent with the targets in the 2035 Comprehensive Plan; refer to Appendix G of the Draft EIS.
- HS-8.** Please refer to FEIS Exhibit 3.1-39 which identifies the estimated number of MHA affordable housing units provided by the alternatives. Please see Chapter 2 for estimation of total number of housing units by alternative.
- HS-9.** All MHA affordable housing units produced would be rent- and income-restricted units primarily serving the 60% Area Median Income level.
- HS-10.** Please see analysis of direct, cultural and economic displacement in Section 3.1 Housing and Socioeconomics. See FEIS Exhibit 3.1-42 for estimation of the number of demolished low-income housing units.
- HS-11.** Chapter 3.1.3 of the MHA EIS identifies mitigation measure that are focused on affordable housing; provision of affordable housing is the purpose of MHA implementation. Please refer to the more general housing mitigation measures contained in the 2035 Comprehensive Plan EIS, which the MHA EIS adopts for purposes of environmental review.
- HS-12.** See frequent comment response regarding family-friendly housing. Please see discussion at FEIS pages 3.61 and 3.62. The action alternatives are would result in greater shares of housing types suited to families with children and large households compared to no action.
- HS-13.** The comment is acknowledged. Commercial development and employment growth in the region are to be indirectly related to the need for housing in Seattle but are not considered to be a direct cause of that need.
- HS-14.** MHA is proposed as one of numerous tools the City can use to address its significant need for affordable housing. The EIS acknowledges and discloses that the MHA program can only

address a portion of the need and cannot completely solve it. The comment regarding the insufficiency of the analysis is acknowledged.

- HS-15.** The comment is acknowledged. Please see discussion added in the FEIS at page 3.64 regarding property taxes.
- HS-16.** Please see frequent comment response regarding location of MHA housing units. MHA gives developers the option of providing affordable units on-site or through payment. This option is required by state law (RCW 36.70A.540). The anticipated split between on-site production and fee-based units is based on reasonable assumptions, but how developers will respond cannot be known or predicted with certainty. The Draft EIS is focused on the total number of affordable units that could be produced by the MHA program.
- HS-17.** Comment noted. Please see frequent comment response regarding MHA affordable housing requirements. Please see also comment responses to Bertolet, Dan.
- HS-18.** Comment noted. Please see response GC-5 above and frequent comment response concerning the displacement risk access to opportunity typology.
- HS-19.** Please refer to the response to GC-2 regarding site-specific analysis in a programmatic EIS. Please see housing inventory data and analysis in Section 3.1 Housing and Socioeconomics.

Land Use (LU)

- LU-1.** MHA is proposed as a city-wide affordable housing program, and the discussion in the EIS identifies impacts and mitigation measures on a city-wide basis. As a general matter, and on a city-wide basis, it is considered appropriate to identify Seattle's design review process as a tool for mitigating potential impacts at the project level.
- LU-2.** Please see updates in the FEIS in Section 3.2 Land Use and 3.3 Aesthetics that reflect recent adoption by the City Council of modifications to design review. Please note that the adopted changes include lower design review thresholds for any lot rezoned from single family, which would apply to lands rezoned to implement MHA under action alternatives. Please see mitigation measure in the Land Use section.
- LU-3.** See frequent comment response concerning location of MHA affordable housing. Any city's ability and authority to require that development occur, or that people locate, in a specific neighborhood is limited by constitutional and other legal principles. In addition, the Growth Management Act also limits the range of regulatory approaches and incentives that a city can use to address affordable housing needs (RCW 36.70A,540). Within these constraints, land use planning, zoning and other programs can be designed to help direct growth to places where it is desired and appropriate, but local real estate markets and personal preference will also strongly influence where development occurs and people choose to live. Section 2.3 of the EIS describes the assumptions incorporated in the

alternatives to estimate on-site production and payments; state law requires that developers be given both options. Also refer to Section 2.4, which describes the factors used by the Office of Housing to select locations for projects funded by fees.

- LU-4.** The comment regarding neighborhood planning is acknowledged.
- LU-5.** The timeframe of the EIS is approximately 20 years, and coincides with the planning horizon of the 2035 Comprehensive Plan. It is acknowledged that construction of the regional light rail system will occur over an extended period of time, and that expanded urban village boundaries reflect long-term planning. The criteria of “very good transit service” used in the EIS alternatives is from the criteria used in the Seattle 2035 planning process – light rail service, or a location with frequent bus service to more than one other urban village.
- LU-6.** The comment is acknowledged.
- LU-7.** It is acknowledged that land use changes occur incrementally, over time, and that for purposes of analysis the EIS is focused on cumulative impacts in 2035.
- LU-8.** The EIS is city-wide in scale and programmatic in its level of analysis. A programmatic EIS of such broad scale cannot, and is not required to, perform “block-level” or site-specific analysis for individual urban villages; please refer to WAC 197-11-442 and the response to frequent comment response concerning individual urban village review. Detailed analysis, at the block level and site level, will occur during review of applications for specific project proposals by the Department of Construction and Inspections. This review will encompass environmental review pursuant to SEPA, which will consider topography and similar factors and design review for affected projects. Please refer to the response to LU-1 above regarding design review.

Aesthetics (A)

- A-1.** The EIS is city-wide in scale and programmatic in its level of analysis. A programmatic EIS of such broad scale cannot, and is not required to, perform “block-level” or site-specific analysis for individual urban villages; please refer to WAC 197-11-442 and the frequent comment response concerning individual urban village review. The Aesthetics section of the Draft EIS (see page 3.126) recognizes that urban form varies widely across the city and that it is not possible to evaluate each zoning and resulting aesthetic change in each urban village neighborhood in detail. The comments’ preference for this type of analysis is acknowledged.

Please also see response to Bricklin, David, comment 6. The EIS discusses various types and degree of aesthetic change in terms of the type and degree of increases to bulk, height and form, and describes the resulting impacts to aesthetic character for prototypical neighborhoods. While these conclusions may be generalizations, they account for a broad range of localized situations. Detailed analysis of aesthetic and other impacts at the

block level and site level, will occur during review of applications for specific project proposals. Please note that the Preferred Alternative includes application of zoning designation in consideration of topographical changes.

- A-2. The comment is acknowledged.
- A-3. Please refer to the response to comment No. A-1 above.
- A-4. Please refer to the response to comment LU-2 regarding design review.
- A-5. See also response to Cave, Don-9. The Draft EIS summarizes policies in the Comprehensive Plan & SEPA regulations (SMC 25.05.675) regarding protection of public views, and generally concludes that increases in building bulk, height and intensity could impact views in some locations. It also notes correctly that such impacts are identified and mitigated when projects at specific locations are proposed and reviewed.

The following provides additional information about the public views that are protected by City policy. The SEPA regulations protect public views of significant natural and manmade features, including Mt. Rainier, the Olympic and Cascade Mountains, Puget Sound, Lake Washington, Lake Union and the Ship Canal, from specified public parks, viewpoints, scenic routes and view corridors. Attachment 1 to the policies lists 85 parks and viewpoints; ten locations providing public views of the space needle are also identified. Numerous scenic routes with protected views are identified on maps. View corridors are identified during project review. Views of the significant natural and man-made features are possible from much of the city, and the listed public parks and viewpoints are similarly spread throughout the city. Given these extensive occurrences, it is neither possible nor required for a programmatic EIS document to evaluate impacts which by their nature are site specific and will vary by location, topography and the existing built environment. Please refer to the response to comment No. A-1 above.

- A-6. Please refer to the response to comment No. A-1 above. The MHA suffixes are an approximation of the degree of zoning change, that is also the basis for the level of the affordable housing requirements. Although there is some variation in the height limit increases within an M category, the suffixes are a valuable approximation of the degree of change, because they approximate the overall proportion of the development capacity increase. In some zones that already allow for dense development a zoning increase of two or more stories may be about the same proportion of increase as the allowance of one additional story in a lower-scale zone.

Transportation (T)

Please also see discussion of transportation comments above in General Comments (GC).

- T-1. **The comment states that the DEIS fails to address parking occupancy.**

The project team used the most recently available data for the DEIS. SDOT is currently working on a detailed study of parking in the Junction as part of its Community Access and Parking Program. Based on this available information, the DEIS did identify a significant adverse parking impact related to Action Alternatives 2 and 3. Please see the frequent comment response concerning Parking Impacts and Mitigation for additional discussion.

T-2. The comment states that representation of the C Line is not accurate under existing conditions, and that some C Line buses pass by stops because they are full during the peak hour, and the 0.67 ratio of passengers to the crowding threshold is too low.

The 0.67 ratio cited by the commenter relates to King County Metro's Crowding Threshold which allows for more passengers than the number of seats on the bus. A crowding threshold ratio of 1.0 is equivalent to a load factor (ratio of passengers to seats) of 1.25 or 1.50, depending on the route frequency. The DEIS acknowledges that some trips operate at full capacity. As stated on page 3.204, "some routes, such as the C Line and E Line with ratio greater than 0.64, will have portions of the route with standing room only. The demand used for the analysis is the average of the maximum loads during the AM peak. Some trips may have no capacity, but over the entire peak period, there is capacity on the corridors." Errata for the FEIS will clarify that some trips will be unable to accommodate all passengers resulting in skipped stops. However, the overall transit impact findings remain unchanged.

The ridership data used is the average maximum load of passengers on each bus trip in Fall 2016, averaged over the AM peak period. Transit riders at skipped stops are reflected in the loaded passengers in the following bus trip. Our analysis of the existing data shows that on average during the AM peak period, a C Line bus trip will have standing room only at the busiest segment, which is consistent with the commenter's statement.

As the total number of future boardings under all three actions align with King County Metro's plan for an 80 percent increase, it is assumed King County Metro will continually adjust its service to accommodate demand in the busiest corridors (pg. 3-218). Additionally, an impact threshold defined at a route level is not reasonable as transit service and frequency can change depending on ridership demand.

T.3. The comment states that Google maps is not an accurate representation of travel times on study corridors, and travel time results from one evening in March is not representative of existing conditions. In addition, the comment states that the West Seattle Bridge suffers the worse traffic eastbound in the morning, and varies throughout the year due to changes in shipping terminal volumes and seasonal variation in commuting.

The DEIS team used the best data available at the time of analysis. Google Maps uses industry-standard speed data based on information provided by cell phones and GPS units—the same data used by SDOT, WSDOT, and others for travel time estimates and traffic studies.

Analyzing PM peak hour conditions is standard practice in identifying traffic impacts at the programmatic level and is generally representative of impacts that would be identified through AM peak hour analysis at the citywide level. Moreover, individual projects will undergo project-specific impact analysis,

which could identify AM traffic congestion impacts and mitigation measures.

T.4 The comment states that the DEIS failed to identify issues arising from blind corners and pedestrian crossings that would result of development and increased pedestrian activity.

This DEIS is a planning level document. Safety issues such as blind corners and pedestrian crossings from development are project specific. Since the actual locations and sizes of development are unknown at this time, the specific mitigation projects required are also unknown. Individual development projects will undergo separate and more detailed SEPA review; specific mitigation will be determined at that time. The commenter is encouraged to bring concerns about any existing safety issues to the attention of SDOT.

Historic Resources (H)

H-1. Please see frequent comment response concerning historic resources. Please see also response to Woo, Eugenia.

Biological Resources and Open Space Analysis (BR/OS)

BR/OS-1. Comments noted. Please see expanded discussion of mitigation measures in Section 3.7 in the FEIS. Please see response to GC-2 above.

BR/OS-2. Comments noted. Please see updated discussion in Section 3.7 in the FEIS. Metrics for parks availability in different geographic areas are updated to use the recently adopted 2017 Parks and Open Space Plan. Please note that the EIS finds a significant impact to Parks and Open Space under all alternatives.

BR/OS-3. Comments noted. Please see expanded discussion of mitigation measures in Section 3.7 in the FEIS, including discussion of impact fees. Please see response to GC-2 above.

BR/OS-4. Comments noted. The EIS estimates change in tree canopy compared to No Action for each of the Action Alternatives.

BR/OS-5. The comment notes two separate passages of text. The second quoted passage deletes the full sentence which states “the parcels changing from SF and LR to NC/C would see the largest change in tree canopy cover if fully developed; however, these two categories only account for approximately 15 acres within the 2,383- acre study area.” This passage is noting that parcels being rezoned from Single Family and Lowrise zones to Commercial zones would see the greatest impact to tree canopy, of the different types of zone changes. The 15 acre quantity is correct, and its inclusion is intended to note the relatively small quantity of lands that have a zone change from SF or LR to a commercial zone in the entirety of the study area. No land is proposed to be rezoned from SF or

LR to a commercial zone in the West Seattle Junction under the preferred alternative.

- BR/OS-6.** Please see mitigations measures added in the FEIS for potential impact to tree canopy.

Public Services and Utilities (PS/U)

- PS/U-1.** Comment noted. Please see response to Noah, Barbara-10, comment 1.
- PS/U-2.** Comment noted. See discussion of impacts. The Seattle Police Department reviewed the DEIS and agreed with the characterization of the impact. See also response to GC-2 above.
- PS/U-3.** Comment noted. Thank you for the comment. The Seattle Fire Department reviewed and provided input on the DEIS Public Services and Utilities Section. See also response to GC-2 above.
- PS/U-4.** Comment noted. Please see expanded analysis of school capacity in the FEIS, including capacity analysis by school attendance area. Since publish of the DEIS there was additional coordination with Seattle Public Schools to incorporate SPS enrollment and capacity data. See also Appendix N.
- PS/U-5.** Comment noted. Please see discussion of safety within Section 3.4 Transportation.
- Please also see the Preferred Alternative map at Appendix H for the West Seattle Junction urban village, which includes reduced intensity of zoning in several currently single family zoned areas compared to other Action Alternatives. It is acknowledged that the LR2 zone proposed under the Preferred Alternative would front onto certain streets that currently have roadway widths that may be less than the dimension listed in the right of way improvements manual. If implemented, at the time of a project action SDOT would review right of way improvement options for potential compliance with the standard, or alternate improvements that could provide needed pedestrian and vehicle circulation.
- PS/U-6.** Comment noted. Please see frequent comment response concerning parking impacts and mitigation.
- PS/U-7.** Comment noted.
- PS/U-8.** Comment noted. Please see frequent comment response concerning stormwater infrastructure, and sanitary sewer infrastructure.
- PS/U-9.** Comment noted. Discussion of City Light service and impacts is included in Section 3.8.
- PS/U-10.** Comment noted. Impacts to privately provided natural gas service was not identified in scoping.
- PS/U-11.** Comment noted. Please see response to Bates, Tawny-2 comment 14.

Air Quality and Greenhouse Gas Emissions (AQ)

- AQ-1.** The comment states that the DEIS draws conclusions from a limited number of monitoring sites. Air quality monitoring sites are located according to the United States Environmental Protection Agency, Washington State Ecology, and the Puget Sound Clean Air Agency. They are generally located accordingly to record representative air quality of the neighborhood, or region. The sites chosen are considered representative of the study area.
- AQ-2.** The comment expresses concerns related to increased construction and demolition activity. Please see estimations in Section 3.1 Housing and Socioeconomics of demolitions in action alternatives compared to no action. This response is relevant to numerous portions of the AQ comments. Controls on construction-related emissions are included in Section 3.9.2 as noted in the comment.
- AQ-3. See discussion of tree canopy in Section 3.8.**
- AQ-4.** The comment states that the DEIS relies on passenger vehicle miles traveled and fails to address the additional hours of vehicle and truck operation due to congestion.
- Vehicle miles traveled, or VMT, has been consistently and comprehensively monitored and documented over time in the region. VMT bears a direct relationship to vehicle emissions and correlates with congestion. The more miles people are driving their vehicles, the more vehicles there are on the roadways at any given time; higher numbers of vehicles eventually result in congestion.
- AQ-5.** The comment states that the DEIS erroneously states that the City of Seattle's recycling target of 70% by 2030, when the goal year is 2020.
- The EIS has been updated with this information.

Appendices (App)

- App-1.** Thank you for the comments regarding preferences for MH implementing zoning changes and development standards. These comments are acknowledged. Please see the Preferred Alternative at Appendix H for the West Seattle Junction Urban Village. Please note that in the FEIS a density limit is proposed to be retained for the Lowrise 1 zone for townhouse and rowhouse apartment types. Please also note that a family-sized housing requirement is included in the FEIS in the LR1 zone. Please see discussion in Section 3.2 Land Use and Appendix F. Please note additional discussion of mitigation measure as a part of proposed design standards in Section 3.2 and 3.3 Aesthetics.
- App-2.** The comments regarding community engagement are acknowledged. Please see frequent comment response concerning community engagement.

Part 2

Responses provided above, address topics summarized in the Part 2 portion of the comment document.

Tran, Dan

1. Commenter recommends hybrid of Alternatives 2 and 3, with recommendations for multiple urban villages, particularly more housing near transit and in high opportunity areas

Thank you for your comment. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Zone changes for the areas identified by commenter are shown in EIS Appendix H Zoning Maps.

2. Concern for displacement, “missing middle” housing options, areas outside of urban villages

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see mitigation measures in this section for discussion of additional policies addressing housing affordability. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

Please also see EIS Chapter 3.1 Housing and Socioeconomics as well as the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses payment dollars to fund acquisition and rehabilitation of existing housing.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, which include family-size housing types such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas, allows for more family-size and family-style housing in areas that are currently zoned single family.

Please see frequent comment response concerning *Single family zones not in the study area*.

3. Request to reduce parking requirements or eliminate altogether

Please see frequent comment response concerning *Impacts to parking*. Note that parking is not required in urban villages and in some cases near frequent transit.

Treffers, Steven

1. Regarding historic resources, the assessment of the affected environment is incomplete.

Thank you for your comment. Please see additional discussion in the FEIS of the affected environment in Section 3.5 historic resources. Please also see frequent comment response concerning analysis of historic resources.

2. Identification of significant impacts to historic resources are downplayed or incorrect.

Thank you for your comments. The use of the threshold of a residential growth rate that is 50% greater than under the no action alternative, is intended as a metric for identification of potential significant impacts. This is clarified in the FEIS. Please see also expanded discussion in the FEIS of mitigation measures and significant unavoidable adverse impacts in Section 3.5.

3. Section 3.5 incorrectly states there will be no significant unavoidable adverse impact to historic resources.

Thank you for your comments. Please see additional discussion in the FEIS of mitigation measures and clarifications in subsection 3.5.4.

4. Changes to review processes for historic resources and design review should be addressed in the EIS.

Thank you for your comments. Please see additional discussion in the FEIS in Section 3.3 aesthetics regarding updates to the design review process. While potential changes to historic review processes are considered, there is no specific proposal being reviewed by decisionmakers at the time of the EIS. Potential revisions to historic review to strengthen protections of historic resources are identified as mitigation measures in the FEIS.

5. Mitigation measures to offset impacts to historic resources are insufficient.

Thank you for your comments. Please see additional discussion of mitigation measures in the FEIS.

Trethewey, Sarah

1. EIS should address urban villages individually.

Please see frequent comment response concerning Individual Urban Village Review.

2. The EIS does not adequately address the city as a whole.

Please see frequent comment response concerning Citywide Impacts to the City as a Whole.

Tromly, Benjamin

1. Comments refer to West Seattle Junction checklist.

Please see comment responses to Tobin-Presser, Christy.

Trumm, Doug

1. Discussion of Alternatives, with preference for aspects of Alternatives 2 and 3, does not prefer Alternative 1

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix H Zoning Maps.

2. Suggestion for larger urban village expansions with RSL and LR1

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see discussion of urban village boundary expansion areas identified in the Seattle 2035 Comprehensive Planning process.

3. Concern about downzoning in low-income neighborhoods, support for implementing the Rainier Beach Neighborhood Plan

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include “9. Evaluate MHA implementation using a social and racial equity/justice lens.”

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix H Zoning Maps for proposed zone changes in the area discussed.

4. Interest in LR2 or larger in many areas to provide a mix of housing cost levels

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Note that proposed zoning includes Residential Small Lot and lowrise zones, which include family-size housing types such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas, allows for more family-size and family-style housing in areas that are currently zoned single family.

Note also that the proposal includes family-size unit requirements for both market rate and affordable housing performance. Also note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

5. Setback policies are costly and should not be too prescriptive

Thank you for your comment. Your comment is noted. Please see EIS Chapter 3.3 Aesthetics for discussion of setbacks, the Design Review Program, and other mitigation measures.

6. Clarify definition of frequent transit to cut parking costs

Please see frequent comment response concerning *Impacts to parking*.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix C MHA Implementation Principles, which include “Ensure MHA program creates affordable housing opportunities throughout the city” and “Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.” Locating more housing near transit and amenity-rich areas helps meet goals for reducing car trips and increasing transit use, which support climate mitigation, equity, and livability goals.

Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

7. Implement key ideas from the CAP report

Thank you for your comment. Your comment is noted.

8. We’re doing well on tree canopy

Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

9. Increase capacity near parks, need a downtown park

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix C MHA Implementation Principles, which include “Ensure MHA program creates affordable housing opportunities throughout the city” and “Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.” Locating more housing near transit and amenity-rich areas helps meet goals for reducing car trips and increasing transit use, which support climate mitigation, equity, and livability goals.

10. Get sewers running well

Please see EIS Chapter 3.8 Public Services and Utilities for discussion of impacts and mitigation measures.

11. Multiple suggestions about reducing car use

Please see frequent comment response concerning *Impacts to parking*.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix C MHA Implementation Principles, which include “Ensure MHA program creates affordable housing opportunities throughout the city” and “Consider locating more housing near neighborhood assets and infrastructure such as parks, schools, and transit.”

Locating more housing near transit and amenity-rich areas helps meet goals for reducing car trips and increasing transit use, which support climate mitigation, equity, and livability goals.

Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures.

Turpin, Kate

1. EIS should address urban villages individually.

Please see frequent comment response concerning Individual Urban Village Review.

2. The EIS does not adequately address the city as a whole.

Please see frequent comment response concerning Citywide Impacts to the City as a Whole.

Tyler

1. All comments concern elimination of the single-family zone

Please see frequent comment response concerning *Single family zones not in the study area*.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, many of which include family-size units such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas allows for more family-size and family-style housing in areas that are currently zoned single family.

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle’s single family zoned land.

Valdez, Roger

1. **Proposed MHA would have the impact of rendering many new housing projects infeasible and would increase prices.**

Comments noted. Please see response to Bertolet, Dan comment 2.

2. **The proposed action will result in impacts to transportation as more new regional residents will be forced to commute longer distances to jobs.**

Comments noted. Please see discussion of impacts to Transportation in Section 3.4 Transportation. Action alternatives estimate greater quantities of housing and jobs within City of Seattle than no action. See also section 3.9 concerning greenhouse gas emissions.

3. **Concerns that various city actions including MHA implementation will suppress housing supply.**

Comments noted. Please see response to Bertolet, Dan. Please see discussion of housing supply in Section 3.1 Housing and Socioeconomics for each alternative. Please see also Appendix I concerning housing production and cost.

Valeske, Austin

1. **Commenter agrees with comment submitted by Capitol Hill Renter's Initiative**

Thank you for your comments. Comments noted. Please see response to Brennan, Alex, which addresses the letter in full.

2. **Request for Neighborhood Commercial zone along E John St between Broadway & 15th**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Zone changes for the area identified by commenter are shown in EIS Appendix H Zoning Maps. The requested zone change is included in the preferred alternative.

3. **Suggests incentives for cross laminated timber with expansion of building code to fill the gap in midrise construction**

Thank you for your comment. Your comment is noted, however it falls outside the scope of this EIS and therefore no response is provided.

Van Woodward, Megan

1. **Increase zoning limits in as many places as possible**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix H Zoning Maps.

2. The more places there are to live, the less people will be displaced

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix H Zoning Maps.

3. New housing should be concentrated around transit

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see EIS Appendix H Zoning Maps.

4. Concern for light and pedestrian-oriented development at street level

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures.

5. Suggestions for how to manage on-street parking and transition away from auto-oriented city

Please see frequent comment response concerning *Impacts to parking*.

6. Concern for historic buildings including ensuring they are actively used

Please see EIS Chapter 3.5 Historic Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Analysis of historic resources*.

7. Increase street tree cover

Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

8. Maintain city parks and allow commerce within them; concern about safety of underutilized parks

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures.

9. Suggestions for improving policing

Please see DEIS Chapter 3.8 concerning Public Services and Utilities: “demand on fire and emergency services would be identified and managed as the project is implemented” and “impacts on fire and emergency services as a result of demand increases would be identified and managed during the project approval process.”

10. Suggestions for transitioning away from an auto-oriented city

Please see response to comment #5 above.

Wallace, Kevin

1. Request for modification of MHA zoning for specific parcels in Northgate urban center from LR3 to MR.

Thank you for your comment. Comment noted. Please see the Preferred Alternative evaluated in the FEIS, and a description of the approach for the Preferred Alternative at Chapter 2.

The comment requests the MR zoning designation. Descriptions of land use impacts in Section 3.2 Land Use, and depictions of aesthetic impact in Section 3.3, would be applicable to the requested rezone, and there are instances of similar zone changes studied within the action alternatives. At the location, the presence of topographical and natural areas buffer to the east of the sites would likely reduce potential land use and aesthetic impacts of the requested zoning change. Other impacts of the proposed change, such as to public services and utilities would be expected to be minor, and would not be likely to create impacts that exceed those already described in the EIS.

Material included in the comment letter could be considered by City Council during review of proposed MHA implementation legislation. It is expected that the executive's proposed legislation for MHA implementation will not include sites that are subject to a recently-approved contract rezone with MHA as a condition. As a result, development proposal and conditions agreed to in the contract rezone process could remain in place, if a pending contract rezone application for the site is approved before MHA implementation legislation is adopted.

Wallace, Lorrie

1. EIS should address urban villages individually.

Please see frequent comment response concerning Individual Urban Village Review.

2. The EIS does not adequately address the city as a whole.

Please see frequent comment response concerning Citywide Impacts to the City as a Whole.

Wang, Rachel

1. Requests to increase the zoning capacity for the property at 3201 and 3211 MLK Jr. Way S. to SM-NR-95.

Comment noted please see the Preferred Alternative for the North Rainier Urban Village at Appendix H, which includes the SM-95 designation for the parcels. Please see discussion of the approach for the Preferred Alternative in Chapter 2.

Ward, David-1

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29th, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Ward, David-2

1. Each urban village and surrounding areas needs a separate and thorough analysis.

Comment noted. Please see frequent comment response concerning individual urban village analysis.

Ward, David-2

1. Graphics misrepresent of allowable bulk and height of new housing.

Comment noted. The Aesthetics visualizations in DEIS Exhibits 3.3-12 through 3.3-15 depict a continuum of potential redevelopment scenarios. A common viewpoint was chosen for these exhibits to provide consistency, and the visual effects of infill development can be seen if all four exhibits are viewed as a series. While a direct, side-by-side comparison between new development and existing single-family homes would provide a clearer picture of impacts on individual properties, the chosen approach allows the EIS analysis to evaluate overall character of the street. For example, Exhibit 3.3-13 shows new (M1) tier development adjacent to a pair of single-family homes, and Exhibit 3.3-14 and 3.3-15 show the potential increases in size in bulk that could occur as those two homes incrementally redevelop to the intensity allowed by proposed development regulations. Taken together, the four exhibits depict the redevelopment and conversion process for neighborhood as a whole. In addition to the specific static visualizations included as exhibits in the DEIS document, preparers of the analysis had access to additional angles and views through use of 3D modelling software to inform conclusions. See also additional models and graphics at Appendix F.

2. Graphics misrepresent the existing housing in single family areas.

Comment noted. See comment response to Cave, Donn-1.

Ward, David-4

1. DEIS fails to meet stated objectives – need for affordable housing.

Commenter states that the amount of the MHA affordable housing requirement is 5-7% and is too low. The proposed MHA

requirements would range from 5-11%. See frequent comment response concerning MHA affordable housing requirement.

2. DEIS fails to meet stated objectives – current and projected demand.

The comment states new housing is expensive. Comment noted. Please see discussion in Section 3.1 Housing and Socioeconomics of the impact of housing supply.

3. DEIS fails to meet stated objectives – 6,200 net new rent- and income-restricted housing units.

Action alternatives would lead to creation of over 7,400 new income and rent restricted units in the study area. It is assumed that existing rent and income restricted units will be continued or replaced. The objective is met by action alternatives.

4. DEIS fails to meet stated objectives – distribute benefits and burdens of growth equitably.

See discussion of direct, economic and cultural displacement in Section 3.1 Housing and Socioeconomics.

Ward, David-5

1. Areas outside of urban villages are not analyzed.

Thank you for your comments. Comment noted. While urban villages are the primary geographic unit used for analyzing the impacts of different distributions of growth under the action alternatives, impacts for areas outside of urban villages are also considered. In certain elements of the environment, such as transportation, impacts are discussed for the system as a whole, including areas outside urban villages. In other elements, such as land use and aesthetics, discussion of the degree of impact of a change from one zoning designation to another is provided, which can be applied to locations throughout the study area.

Please note that the degree of zoning change to implement MHA for those areas outside of urban villages is the minimum necessary to implement MHA (application of the MHA with an (M) tier capacity increase), with the exception of several individual parcels with unique circumstances. These (M) tier changes are incremental in nature, and in general result in the allowance of up to one more story of development capacity in areas already zoned for commercial or multi-family development. No changes to allowed land use categories are proposed, and no rezones of single family lands are proposed.

Ward, David-6

1. Description of land use impacts as general minor to moderate in degree is a false statement.

Commenter states the single greatest land use impact identified for any specific parcel or zone change in the alternative in the urban

village. Each urban village includes many different zone changes for different areas and blocks within the village. Even though a land use impact could be significant in one specific area, it could also be minor or moderate for the remainder of the urban village, which is usually the case.

2. Higher MHA requirements in strong market areas.

The commenter describes MHA requirements for Downtown and South Lake Union, which are outside of the study area. The statement in the EIS pertains to the study area. See also Appendix E Map of MHA Areas.

Ward, David-7

1. Inadequate analysis.

Please see frequent comment response concerning individual urban village review. Please note that growth estimates include pipeline development. Please see also response to Bricklin, David-6.

Ward, David-8

1. Determine Seattle out-migration.

Comment noted.

Ward, David-9

1. TRAO as inadequate method for analyzing displacement.

As the comment states, it is acknowledged in the EIS that there are limitations to the use of TRAO data for the estimation of the number of displaced low-income households. However, since information is collected to identify displaced low-income tenants for all instances of demolished of housing, TRAO data are the best comprehensive data source available.

Ward, David-10

1. Problems with TRAO as mitigation measure.

It is acknowledged that TRAO cannot be expected to stop displacement. As stated in the EIS TRAO is designed to partially mitigate the impacts of physical displacement. Changes that increase the effectiveness of TRAO could help tenants to access replacement housing in Seattle.

Warren, Barbara

1. Require developer to build units on site.

Thank you for your comment. Comment noted. Please see frequent comment responses concerning location of MHA affordable housing units, and MHA affordable housing requirements.

2. Provide transitions outside of urban villages within adjacent single family neighborhoods.

Thank you for your constructive suggestion. Comment noted. Urban village boundary expansions are considered for MHA implementation in the areas studied in the Settle 2035 Comprehensive Plan, to an approximate 10-minute walkshed from transit. Please see frequent comment response concerning single family areas outside of urban villages.

3. Allocate resources to single family neighborhoods who want to plan proactively for more housing.

Again, thank you for your constructive suggestion. Comment noted. As part of a separate action addressing single family areas outside of urban villages, this could be an effective approach.

4. Summary of support and suggested modifications for specific areas in Roosevelt and Ravenna.

Comments noted. The map is noted. Please see the Preferred Alternative map for the Roosevelt urban village at Appendix H.

5. The comment proposes a modification to Alternatives 2 and 3 to provide more gradual land use transition.

Comments noted. The map is noted. Please see the Preferred Alternative map for the Roosevelt urban village at Appendix H.

6. Community planning as mitigation should include areas outside of urban villages.

Comments noted. Community planning efforts would not be limited to urban village areas.

7. Neighborhood design guidelines for Ravenna / Bryant could help mitigate aesthetic impacts and impacts to historic resources.

Comments noted.

8. Expansion of the village along 65th needs further study for pedestrian safety.

Comments noted. Please see discussion of Transportation impacts at Section 3.4. Streetscape improvements, including expanding sidewalk widths would be reviewed and considered at the time of a project specific action for properties fronting NE 65th.

9. Parking is a concern.

Comments noted. Please see frequent comment response concerning parking impacts and mitigation.

10. Concern about loss of architectural character of older craftsman, tudor and mid-century homes.

Comments noted. Please see comment responses to Woo, Eugenia.

11. No specific studies of ECA areas or tree canopy is provided for the Roosevelt / Ravenna area.

Comments noted. Please see discussion of project level review in Section 3.6 Biological Resources. Note that the Preferred Alternative reduces lands from urban village boundary expansions if critical areas or sensitive environmental conditions are present.

Waterman, Rose

1. The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

Weingarten, Tom

1. Concerns with MHA implementation on the west side of 42nd Ave SW between Holly and Heights Ave.

Thank you for your comment. Comment noted. The comment suggests that owners of property with MHA implementation across the street from the commenter's property will have increased pressure to sell homes for development. Please note that the MHA affordable housing requirement offsets potential increased value of property due to a change in zoning. See also comment response to Bertolet, Dan for discussion.

2. Everyone will struggle to park.

Thank you for your comments. See frequent comment response concerning parking impacts and mitigation.

3. Developers will not build affordable housing.

Please see frequent comment response concerning MHA affordable housing requirements.

4. Suggests removal of six houses from MHA implementation, and from the urban village.

Thank you for your comment. Comment noted.

West, Margaret

1. DEIS does not represent all urban villages and the city overall

Please see frequent comment responses concerning *Individual urban village review* and *Citywide impacts*.

2. Concern about analysis of tree canopy, should be done at the neighborhood level

Please see frequent comment responses concerning *Individual urban village review and Impacts on tree canopy*.

3. Inadequate analysis of public services and utilities – data should include fixture units for connection points

Please see EIS Chapter 3.8 Public Services and Utilities for discussion of impacts and mitigation measures.

Westbook, Melissa

1. Impact fees are needed.

Comment noted. Please see mitigation measures discussion in the FEIS in Sections 3.4 Transportation, 3.7 Open Space and Recreation, and 3.8 Public Services and Utilities.

2. Pass an ordinance committing the city to consider school capacity in all planning decisions.

Comment noted. Please see responses below.

3. Replace test scores as a criteria for determining access to opportunity.

Comment noted. Fourteen criteria are used in the access to opportunity index for urban villages. School performance based on elementary and middle school test scores, high school graduation rates, and access to a college or university are education-related criteria in the index. High performing schools and access to higher education in an area of the city are among the factors considered in identifying the geographic locations that provide high access to opportunity for residents. Alternatives in the EIS including the Preferred Alternative feature an approach that would direct relatively more new housing to high opportunity areas. The intent is to allow a greater number of residents, including low-income and racial and ethnic minority residents to benefit from living within a high opportunity area.

4. School capacity was not considered. Additional mitigation measures are needed.

Please see additional analysis in the FEIS in Section 3.8 concerning school capacity constraints. Since the DEIS, the City and Seattle Public Schools (SPS) held additional discussion and coordination related to school enrollment and school capacity. Data provided by SPS are used in the FEIS to estimate an enrollment to capacity ratio for each school service area. Data from SPS are included in a new Appendix N. SPS data are used to identify student generation ratios from net new housing. In the impacts section, potential additional students from incremental growth that could occur due to implementation of the Preferred Alternative is estimated. The FEIS also includes additional discussion of mitigation measures for potential impacts to public schools.

The FEIS includes additional discussion of mitigation measures that could be employed to address school capacity constraints. One of the additional potential mitigation measures is the exploration of impact fees for schools. Discussion of mitigation measures also includes existing and potential partnership between the City and SPS to procure lands for location of school facilities. The FEIS Exhibit 3.8-7 estimates net students estimated to be generated in school service areas from the Preferred Alternative. For the purposes of the EIS, the focus of analysis is the impact of additional net students stemming from MHA implementation.

Weybright, JoElla

1. Concern about Roosevelt Urban Village boundary expansion east of 15th Ave NE – does not support

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see discussion of urban village boundary expansion areas identified in the Seattle 2035 Comprehensive Planning process.

2. Concern about displacement

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

Please see EIS Chapter 3.1 Housing and Socioeconomics as well as the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses payment dollars to fund acquisition and rehabilitation of existing housing.

3. Concern that proposed zoning is not consistent with transition principle

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Proposed zone changes for the area identified by commenter are shown in EIS Appendix H Zoning Maps.

The area discussed includes zone changes from Single Family to Lowrise 1 & 2-Residential Commercial, Single Family to Residential Small Lot, Single Family to Lowrise 1, and NC2-40 to NC2-55. These changes are consistent with the transition principle.

4. Concern about impact on neighborhood cohesion

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent

comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

Please see EIS Chapter 3.1 Housing and Socioeconomics as well as the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses payment dollars to fund acquisition and rehabilitation of existing housing.

5. Concern about loss of bungalows and craftsman homes

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle's single family zoned land.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, which include family-size housing types such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas, allows for more family-size and family-style housing in areas that are currently zoned single family.

Please see EIS Chapter 3.5 Historic Resources for discussion of impacts and mitigation measures, as well as EIS Chapter 3.3 Aesthetics.

6. Concern about sanitary sewer infrastructure

Please see frequent comment response concerning *Impacts to sanitary sewer systems*.

White, Catherine

1. Commenter writes in support of Madison-Miller Park Community Group letter.

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

Williams, Amber

1. Do not change zoning to implement MHA in South Park.

Comment noted.

2. I was not notified.

Please see frequent comment response concerning community engagement. Please see also Appendix B summary of community input.

3. Concern about loss of trees.

Please see analysis of tree canopy at Section 3.6 Biological Resources, and Section 3.9 Air Quality and Greenhouse Gas Emissions.

4. South Park does not have the amenities or infrastructure of an Urban Village.

Comment noted. Please see analysis of in Sections 3.4, 3.7, 3.8.

5. Rezone areas in Sodo.

Comment noted.

Williams, Amber-2

1. The comment document requests completion of an EIS pertaining to just the South Park neighborhood. The comment document notes that South Park has serious environmental issues, and expresses concern about notice and public engagement.

Comments noted. Thank you for your comment. Please see frequent comment responses concerning individual urban village review and community engagement. Please see also Appendix B. Please see the Preferred Alternative map at Appendix H for South Park. In recognition of constraints in South Park, the minimum zoning changes necessary to implement MHA are proposed for the South Park area. This approach is consistent with the approach proposed for areas outside of urban villages under the action alternatives.

Williams, Bonnie-1

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Williams, Bonnie-2

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Williams, Bonnie-3

1. Comments about Wallhala engagement with the City

Thank you for your comment. Your comment is noted.

2. Commenter provides context about Wallhala group

Thank you for your comment. Your comment is noted.

3. Concern about focus group process

Please see frequent comment response concerning *Community engagement*. Please also see EIS Appendix B for a discussion of the MHA community input process and a summary of input received, as well as proposed zone changes guided by community input.

4. Concern about impacts to single family areas

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle's single family zoned land.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, which include family-size housing types such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas, allows for more family-size and family-style housing in areas that are currently zoned single family.

5. Concern about community generated principles for MHA implementation

Please see frequent comment response concerning *Community engagement*. Please also see EIS Appendix B for a discussion of the MHA community input process and a summary of input received, as well as proposed zone changes guided by community input. Please also see EIS Appendix C MHA Implementation Principles.

6. Concern about community engagement through focus group process

Please see response to comment #3 above.

7. Concern about HALA.consider.it online platform

Please see response to comment #3 above.

8. Concern about impacts to single family areas

Please see response to comment #4 above.

9. Concern about displacement

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include "9. Evaluate MHA implementation using a social and racial equity/justice lens."

Note also that the proposal is aimed at providing additional affordable housing so the City intends to pursue mitigation measures that will alleviate impacts while still achieving the goal of improved housing affordability. Nothing in this proposal impedes the ability of the City to pursue further investment in infrastructure.

10. Concern about community engagement equity

Please see response to comment #3 above.

11. Additional alternatives should have been studied, including no zone changes

Please see frequent comment response concerning *Alternatives to MHA that could achieve objectives*. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

12. Concern about community engagement and documentation of varying opinions

Please see response to comment #3 above.

13. Concern about particular events in the community engagement process

Please see response to comment #3 above.

14. Concern about community generated principles for MHA implementation

Please see frequent comment response concerning *Community engagement*. Please also see EIS Appendix B for a discussion of the MHA community input process and a summary of input received, as well as proposed zone changes guided by community input. Please also see EIS Appendix C MHA Implementation Principles.

15. Concern about architectural character, design review, homeownership and family-size options

Please see EIS Chapter 3.3 Aesthetics for discussion of the Design Review Program as well as other mitigation measures. Please see EIS Appendix F Summary of Changes to the Land Use Code & MHA Urban Design and Neighborhood Character Study.

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle's single family zoned land.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, which include family-size housing types such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas, allows for more family-size and family-style housing, and likelihood of expanded ownership options, in areas that are currently zoned single family.

16. Concern about community engagement methods

Please see frequent comment response concerning *Community engagement*. Please also see EIS Appendix B for a discussion of the MHA community input process and a summary of input received, as well as proposed zone changes guided by community input.

17. Concern about infrastructure, displacement, and homelessness

Please see response to comment #9 above.

18. Commenter prefers Alternative 1, other alternatives should have been studied

Thank you for your comment. Your comment is noted.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

Please see frequent comment response concerning *Alternatives to MHA that could achieve objectives*.

19. Concern about affordable housing for those earning less than 60% AMI

Please see frequent comment response concerning *MHA affordable housing requirements* and *Location of MHA housing units*. Note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock, affordable to incomes 0-80% AMI.

20. Concern about single family areas in Wallingford

Please see response to comment #4 above.

21. Documentation provided showing images from outreach events, and recommended alternatives to the proposal

Thank you for your comment. Your comment is noted.

Williams, Bonnie-4

1. Commenter supports Historic Seattle comments

Please see comment response to Woo, Eugenia.

Williams, Bonnie-5

1. Alternatives are not valid

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes.

2. No Alternative 1 map

[The DEIS webmap](#) includes data showing existing zoning, which is the scenario analyzed in the No Action Alternative. Visit the layers section of the map and turn on the layer titled “Existing Zoning.”

3. Urban Villages were not studied individually

Please see frequent comment response concerning *Individual urban village review*.

4. Concern about impacts to families and school capacity

Please see frequent comment response concerning *Impacts to Seattle Public School capacity*.

Please see EIS Chapter 3.2 Land Use for discussion of impacts and mitigation measures. Also note that proposed zone changes include only 6% of Seattle’s single family zoned land.

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Note that proposed zoning includes Residential Small Lot and lowrise zones, which include family-size housing types such as townhomes, rowhouses, and stacked flats. Expanding these zones, which carry higher density limits than single family areas, allows for more family-size and family-style housing, and likelihood of expanded ownership options, in areas that are currently zoned single family.

Note also that the proposal includes family-size unit requirements for both market rate and affordable housing performance. Also note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

5. Urban Villages were not studied individually

Please see response to comment #3 above.

6. Alternatives to MHA were not studied

Please see frequent comment response concerning *Alternatives to MHA that could achieve objectives*.

7. Concern about displacement related to property taxes

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*. Please also see EIS Appendix C MHA Implementation Principles, which include “9.

Evaluate MHA implementation using a social and racial equity/justice lens.”

Please see additional discussion in the FEIS section 3.1.2 impacts, of impacts of property tax increases on homeowners.

8. DEIS did not study alternatives to MHA

Please see frequent comment response concerning *Alternatives to MHA that could achieve objectives*.

9. DEIS does not address time delay in demolition vs construction of affordable housing

Comment noted.

10. Concern about displacement of businesses and cultural institutions

Please see response to comment #7 above.

11. “Spill-over” effects onto adjacent communities were not analyzed

Please see frequent comment response concerning *Individual urban village review* and *Citywide impacts*.

12. Links between commercial construction and housing demand were not assessed

Comment noted. Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, which includes description of the preferred alternative and methodology for proposed zone changes. Please also see Chapter 3.1 Housing and Socioeconomics for a discussion of housing supply and demand.

13. The DEIS fails to address integrated planning for concurrent infrastructure improvements

The analysis addresses topics discussed in this comment, and includes policy, plan, and programs that together develop and maintain infrastructure for the study area.

14. No alternatives were considered in the event of a successful court challenge to MHA

Please see frequent comment response concerning *Alternatives to MHA that could achieve objectives*.

Williams, Bonnie-6

1. through comment 6.

Concern about parking, and discussion of sources of parking issues

Concern about noise and safety, recommend collecting impact fees

Concern about parking

Discussion of parking challenges presented in DEIS

Proposed parking mitigation will make parking worse

Insufficient analysis of parking demand relative to new shortage of supply

Please see frequent comment response concerning *Impacts to parking*.

7. **Concern about safety for residents walking home from parked cars in the dark**

Please see EIS Chapter 2.0 Description of the Proposal and Alternatives, Chapter 3.4 Transportation for discussion of impacts and mitigation measures, including discussion of pedestrian safety.

Williams, Bonnie-7

1. **Wallingford opportunity and displacement classification is incorrect**

Please see frequent comment response concerning *Displacement Risk Access to Opportunity Typology*.

2. **Concern about displacement, property taxes, impact fees**

Please see EIS Chapter 3.1 Housing and Socioeconomics which includes an expanded section discussing cultural displacement and correlation between housing development and share of low-income households in Seattle neighborhoods. Please also see frequent comment responses concerning *Impacts on racial and cultural minority groups* and *Displacement analysis*.

Please see EIS Chapter 3.1 Housing and Socioeconomics as well as the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses payment dollars to fund acquisition and rehabilitation of existing housing.

Please see frequent comment response concerning *Property taxes*.

The proposal is aimed at providing additional affordable housing so the City intends to pursue mitigation measures that will alleviate impacts while still achieving the goal of improved housing affordability. Nothing in this proposal impedes the ability of the City to pursue implementation of an impact fee program.

3. Wallingford opportunity and displacement classification is incorrect, concern for school capacity, parks, libraries, and roads

Please see response to comment #1 above. Please see frequent comment response concerning Impacts to *Seattle Public School capacity*.

Please see frequent comment response concerning *Individual urban village review*.

4. Wallingford lacks access to a community center

Please see frequent comment response concerning *Individual urban village review*.

5. Concern about lack of coordination between City of Seattle and Seattle Public School planning

Please see frequent comment response concerning Impacts to *Seattle Public School capacity*.

6. Discussion of impacts of Lincoln High School to recreational facilities

Please see frequent comment responses concerning Impacts to *Seattle Public School capacity* and *Individual urban village review*.

7. Concern about inadequacy of library in Wallingford

Please see frequent comment response concerning *Individual urban village review*.

8. Concern about lack of walkable neighborhood school in Wallingford

Please see frequent comment response concerning *Individual urban village review*.

Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as Relevant Plans and Policies, which includes “New sidewalks, particularly near schools” as part of the City of Seattle 2017–2022 Transportation Capital Improvement Program.

9. Concern about inadequacy of transit

Please also see Chapter 3.4 Transportation for discussion of impacts and mitigation measures, as well as Relevant Plans and Policies.

Williams, Bonnie-8

1. EIS does not distinguish between evergreen and deciduous trees when discussing tree canopy and biological resources particularly in single family zones

Comment noted. Please see EIS Chapter 3.6 Biological Resources for discussion of impacts and mitigation measures, as well as frequent comment response concerning *Impacts on tree canopy*.

2. Open Space and Recreation impacts should include impact fees, and discuss how mitigations will provide needed acreage

Please see EIS Chapter 3.7 Open Space and Recreation for discussion of impacts and mitigation measures.

The proposal is aimed at providing additional affordable housing so the City intends to pursue mitigation measures that will alleviate impacts while still achieving the goal of improved housing affordability. Nothing in this proposal impedes the ability of the City to pursue implementation of an impact fee program.

3. Libraries should be included in public services and utilities

Comment noted.

4. Concern about police service response times and capacity

Please see DEIS Chapter 3.8 concerning Public Services and Utilities: “demand on fire and emergency services would be identified and managed as the project is implemented” and “impacts on fire and emergency services as a result of demand increases would be identified and managed during the project approval process.”

5. Impacts on air quality should include dispersion of demolition and construction-related particles and other pollutants

Please see comment response Bates, Tawny-2. Potential air quality impacts are discussed in Section 3.9, including construction-related emissions. The Puget Sound Clean Air Agency requires dust and pollution control measures to be applied to construction projects to reduce emissions. Non-compliance is unlawful.

6. Concern about impacts to air quality due to traffic congestion and other vehicle inputs

Comment noted. Please see EIS Chapter 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures.

7. Concern about outdated or irrelevant greenhouse gas and particulate matter data

Comment noted. Please see EIS Chapter 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures.

8. Concern about building waste as a greenhouse gas contributor

Comment noted. Please see EIS Chapter 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures.

9. EIS should consider more realistic and updated fuel economy projections

Comment noted. Comment noted. Please see EIS Chapter 3.9 Air Quality and Green House Gases for discussion of impacts and mitigation measures.

10. Concern about noise from construction, particularly on weekends

Please see comment response Bates, Tawny-2.

Williams, Natalie-1

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Williams, Natalie-2

1. Comments about noise and air pollution effects in high rise buildings.

Comments noted. Please note that the Preferred Alternative limits the degree of capacity increases in environmentally sensitive areas including areas near to air pollution sources.

2. Livability of neighborhoods.

Comments noted. Please see Section 3.3 Aesthetics, and Section 3.2 Land Use.

Williams, Natalie-3

1. Extend the DEIS comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Williams, Natalie-4

1. Concern about lack of detail describing affordable housing fund of MHA payments

Please see frequent comment response concerning *MHA affordable housing requirements* and *Location of MHA housing units*. Note that affordable units funded by the Office of Housing meet rigorous standards for quality materials, sustainability, and are designed to meet community-identified goals such as family-friendly housing. Please also see the [Seattle Housing Levy Administrative & Financial Plan Program Years 2017-2018 And Housing Funding Policies](#) for information about how the Seattle Office of Housing uses MHA payment dollars to fund acquisition and rehabilitation of existing housing stock.

Williams, Natalie-5

1. Concern about fire department training for new development types

Please see DEIS Chapter 3.8 concerning Public Services and Utilities: "demand on fire and emergency services would be identified

and managed as the project is implemented” and “impacts on fire and emergency services as a result of demand increases would be identified and managed during the project approval process.”

Williams, Niki

1. Comments concerning aesthetics and neighborhood character.

Comments noted. Please see Section 3.3 Aesthetics. Please see response to Bricklin, David comment 6. Please note that thresholds for design review and discussion of design review is updated in the FEIS to reflect recent actions by City Council. Please see responses to Noah, Barbara-17 and Ward, David-3.

2. Alternatives that should be studied.

Please see frequent comment responses concerning: use of public land for affordable housing, alternatives that could reach objectives, single family areas outside of urban villages.

3. Growth estimates and comprehensive planning and maximum zoned density.

See discussion in Chapter 2 and Appendix G concerning growth estimates. The Seattle 2035 Comprehensive Plan is used as a basis for analyzing the action alternatives. Section 3.1 includes estimation of zoned capacity under each alternative.

4. Location of affordable housing units.

See frequent response on this topic.

5. Lowrise one zone does not encourage family sized housing.

Comment noted. Please see frequent comment topic on family-friendly housing. Please also note that in the FEIS a density limit is proposed for rowhouse and townhouse building types in the LR1 zone, and a family-sized housing requirement is proposed for any development with more than 4 units.

Ruth, Williams

15. Opposes policy or use changes for natural parks lands.

Thank you for your comment. Please see frequent comment response on the topic. No policy or use changes for natural parks lands are proposed as part of the proposed action to implement MHA.

Williamson, Don

16. Opposes MHA implementation in South Park. Maintain single family zoning. The Commenter cites concerns with flooding, parking, lacking transit service.

Thank you for your comment. Comment noted. Please see the Preferred Alternative map at Appendix H for South Park. Note that

MHA implementation for South Park is proposed in the Preferred Alternative with the minimum increases necessary ((M) Tier rezones) to put the affordable housing requirement in place. This approach is the same as for areas outside of an urban village.

Willis, Elise

1. **Request for zone change at site of Photographic Center Northwest to NC2P-75. This will help future development opportunities will include affordable housing.**

Thank you for your comment. Please see the Preferred Alternative in Chapter 2.0 Description of the Proposal and Alternatives and Appendix H, which shows zoning maps for the Preferred Alternative.

The Preferred Alternative includes the zoning change as requested.

Willumson, Paul

1. **The draft EIS does not meet SEPA requirements for the consideration of alternatives**

Thank you for your comment. Your comment is noted. Please see the FEIS which includes additional analysis in many of the elements of the environment.

Wilson, Tom

1. **Prefer no change to the current study area. There is a lot of untapped space and growth.**

Thank you for your comment. Your comment is noted. Please see EIS Chapter 2.0 Description of the Proposed Alternatives for the rationale and urgency in implementing MHA.

Wolf, Daryll

1. **A specific plan for the Westwood Highland Park area including South Delridge.**

Thank you for your comments. Comment noted. Please note mitigation measures in the land use and aesthetics sections related to community planning. Please see discussion of direct, economic and cultural displacement in Section 3.1 Housing and Socioeconomics.

2. **Concerns about impact to schools.**

Thank you for your comments. Comment noted. Please see additional analysis in the FEIS in Section 3.8 regarding school capacity. Please also see additional discussion of mitigation measures in that section.

3. Concerns about lack of open space

Thank you for your comments. Comment noted. Please see discussion of open space and recreation in Section 3.7. Please note additional discussion of mitigation measures in the FEIS in that section.

4. Concerns about displacement. It will be difficult for larger families to find opportunities to remain in the neighborhood.

Thank you for your comments. Comment noted. Please see frequent comment response concerning family-friendly housing.

5. Promote a vibrant small business community.

Comment noted. Please see discussion of the role of small businesses in the cultural displacement section added within Section 3.1 of the FEIS. Please note mitigation measures in that section.

6. Pedestrian and bicycle infrastructure. Consider topography.

Comments noted. Please see Section 3.4 Transportation.

7. East / West and North / South transit service.

Comments noted. Please see Section 3.4 Transportation.

8. Economic and educational opportunities to build the area into a destination.

Comments noted.

Woo, Eugenia

2. Background about the work of Historic Seattle, including past preservation efforts that include affordable housing spaces.

Thank you for your comments, and for Historic Seattle's excellent work to preserve historic resources and contribute towards affordable housing.

3. The affected environment section does not provide adequate understanding of the study area's history and context.

Thank you for your comments. Comment noted. As a Programmatic EIS, the analysis of historic resources is addressed at a high level to provide a general understanding of the City's history and the potential for impacts to historic resources throughout the study area. Each neighborhood in the study area has its own unique history and associated historic resources. It is not possible to provide a detailed history of each neighborhood within the citywide study area in a programmatic EIS of this scale. In addition to the fact that a more general level of detail is appropriate for a programmatic EIS, much of the information that would be required to provide a site-specific analysis is not available.

The Programmatic EIS relies upon existing neighborhood-specific historic contexts and references these to provide information about the history of the study area, where already available. The Draft EIS discloses that not all of the existing properties within the study area

have been inventoried nor have historic context statements been prepared for all the urban villages. DEIS Exhibit 3.5-5 lists all the urban villages in the study area and identifies which have been inventoried and which have had historic context statements prepared.

4. Exhibits identifying the NRHP Determined Eligible Properties appear without context or explanation.

Thank you for your comment. Please see FEIS for clarifications regarding the NRHP sites, and a listing of the site locations by urban village for clarity.

5. The Historic Resources section should look at the context of social inequity.

Thank you for your comment. Comments noted. Please see discussion added in the FEIS in Section 3.1 Housing and Socioeconomics related, historical context of racial segregation. All of the urban villages may contain resources that are associated with marginalized or underrepresented immigrant communities. These associations often contribute to a resource's potential historic eligibility. Some urban villages in the study area have a higher likelihood for containing these types of resources, such as (but not limited to) the 23rd & Union-Jackson and Columbia City areas. Other areas, such as Licton Springs, have associations with the Duwamish people. Additionally, subsurface archaeological resources associated with Native American tribes and the history of Seattle exist throughout the study area and it is likely that additional archaeological resources exist that have not yet been identified. To address this, a new mitigation measure in the Final EIS is that the City consider potential impacts to resources that may have these associations when reviewing projects, and the mitigation measure of preparing thematic historic context inventories on marginalized or underrepresented immigrant communities.

6. The DEIS does not connect MHA to unreinforced masonry (URM) buildings.

The Draft EIS discloses that there are Unreinforced Masonry (URM) buildings throughout the study area and that this is a common building type. URM buildings are often eligible for listing in a historic register and contribute the historic character of neighborhoods. The City maintains a list of URM buildings that is updated quarterly and field verified.

Through the URM Policy Committee, the City is considering adopting a policy that would require seismic upgrades to URM buildings. The Policy Committee submitted its final recommendations to the City on August 3, 2017. To date, the policy has not been adopted. The Policy Committee recommends excluding requirements for buildings that have brick veneer, concrete masonry, and are single-family and two-unit residences (see Unreinforced Masonry Policy Committee, July 25, 2017, available at http://www.seattle.gov/dpd/cs/groups/pan/@pan/documents/web_informational/p3452259.pdf). Please see expanded discussion of URM buildings in FEIS subsection 3.5.2.

6. and 7. The DEIS minimizes MHA impacts on historic resources.

Potential impacts to each urban village are analyzed in Chapter 3.5 with regard to the potential growth rates under each alternative. Urban villages with high growth rates were identified as areas where there is higher potential for impact to the overall historic fabric of the urban village. Proposed rezoning changes were also analyzed for potential impacts to historic resources due to the potential for changes in scale. Analysis of the potential impacts to scale is also provided in Section 3.3 (Aesthetics), and Section 3.2 (Land Use).

Under all Alternatives, identification and evaluation of potential historic resources and potential historic districts would still occur at the project-level under applicable existing City permitting requirements and design review thresholds. Under all Alternatives, existing local and national historic districts would be excluded from proposed zoning changes and MHA requirements. Please see additional discussion of mitigation measures in the FEIS. Please see also response to Treffers, Steven comment 2.

8. The DEIS does not address how future newly-created historic districts would be treated for MHA purposes.

Potential future impacts to newly-created historic districts would be considered at an individual basis at the time of designation. At the time of establishment of any new historic district an evaluation of how and whether MHA would apply to the area would be conducted. Decisionmakers when establishing the new district could elect to apply MHA requirements as they are applied in other locations, not apply MHA requirements, or apply MHA requirements with features specific to the newly designated district.

10. Supports identification of individual historic resources and potential districts through continuation of systematic inventories.

Comments noted. Please see expanded discussion in the FEIS of mitigation measures.

11. Supports taking a closer look at conservation districts.

Comment noted.

12. The city does not have an effective demolition review policy.

Comment noted. Please see expanded discussion in the FEIS of mitigation measures.

13. Support for meaningful incentives for preservation beyond what currently exists.

Comment noted. Please see expanded discussion in the FEIS of mitigation measures.

Woo, Vickie

1. **Comments concerning rules of conduct for tenants in multifamily buildings.**

Thank you for your comments. Comment noted.

Wood, Marilyn

7. **EIS does not adequately reflect impact of action alternatives on the Crown Hill Urban Village.**

Comment noted. Please see response to Kreuger, Ingrid-1.

Woodland, Nancy

1. **DEIS is not specific enough to local areas.**

Comment noted. Please see frequent comment response concerning individual urban village review.

2. **More local citizen input is needed.**

Comment noted. Please see frequent comment response concerning community engagement. Please also see Appendix B summary of community input.

Woodward, Janet

1. **Supports comments and conclusions of the Madison Miller Park Community Group.**

Please see response to Holliday, Guy, which addresses the August 2 comment letter from the Madison Miller Park Community Group in full. Please also see the response to Bricklin, David concerning lands in the Madison Miller urban village.

2. **MHA would be fairly and equitably implemented as a citywide program applied to all development.**

Comment noted. MHA would apply to all commercial and multi-family zoned property in the City and all urban villages in the action alternatives. Please see frequent comment response concerning single family areas outside of urban villages.

Wordeman, Linda

1. **Do not upzone in Ballard. Ballard schools are packed full.**

Comment noted. Please see analysis of school capacity in the FEIS in Section 3.8.

Wright, Barbara-1

1. Concerns about changes to single family zoning.

Comments noted. Please see discussion of direct, economic and cultural displacement in Section 3.1.

Wright, Barbara-2

1. Concerns about rezones to implement MHA in the West Seattle Junction. City's EIS does not adequately address parking, transportation, displacement and neighborhood character.

Comments noted. Please see Sections 3.1 Housing and Socioeconomics for discussion of direct, economic and cultural displacement. Please see Section 3.4 Transportation, and Section 3.3 Aesthetics.

Wright, Stacy

1. The EIS studies only slight variations on the "Grand Bargain" and does not include alternatives such as zone changes across broader areas of the city, or others.

Thank you for your comment. Please see frequent comment response "Alternatives to MHA that could achieve objectives."

Yaron, Bryce (Futurewise)

1. Summary of Futurewise's work over 25 years to prevent sprawl and make urban areas livable and available to all.

Thank you for your comments and your attention to this issue.

2. Focus on key principles to ensure successful implementation of MHA:

- a. Expand all urban villages to a 10-minute walkshed of frequent transit service.
- b. Increase development capacity in high access-to-opportunity neighborhoods with low displacement risk.
- c. Provide a broad array of housing types and sizes at all income levels.

Comments noted. Please see the description of the Preferred Alternative in FEIS Chapter 2. Under the Preferred Alternative all urban villages studied as a part of the Seattle 2035 Comprehensive Plan process would be expanded to an approximate 10-minute walkshed. The Preferred Alternative would emphasize locating relatively more housing and job growth in high opportunity areas with low displacement risk. See discussion of the array of housing types and sizes in Section 3.1 Housing and Socioeconomics.

3. Supports use of the Growth and Equity Analysis as a framework for analysis.

Comments noted. Please see the description of the Preferred Alternative in FEIS Chapter 2.

Zemke, Steve (Friends of Seattle's Urban Forest)

Note: This comment response was potentially inadvertently omitted from comment responses and letters published in the FEIS on November 9th. The comment response and comment letter was added to published FEIS documents on November 21.

1. The longer range goal for canopy coverage should be 40%.

Comment noted. The goal considered in the EIS is the 30% coverage goal set in the 2007 canopy cover study, which is evaluated as the goal by the City's Office of Sustainability and the Environment.

2. Calculating tree canopy loss under Scenarios 1,2 and 3 is necessary.

Comments noted. Changes in tree canopy coverage over time include tree losses due to development as well as tree maturation and planting. Measures described in subsection 3.6.3 mitigation measures are already being considered by the city, with the intent of increasing tree canopy coverage to meet the 30% citywide goal. Since 2016 LiDAR data are not directly comparable with past tree canopy coverage surveys it is not possible to ascertain an existing overall trend in tree canopy gain or loss under existing conditions. It is possible that city policies will have the intended effect of increasing tree canopy over time. Since it is not possible with existing data to ascertain the aggregate trend in tree canopy coverage for the study area as a whole, the assumption is made that tree canopy would remain static under the no action alternative. Ongoing improvements to tree canopy protection and retention could increase canopy coverage over the 20-year period, while development over the 20 year period could reduce canopy coverage in some areas.

For each action alternative, increments of growth compared to no action are reflected in the assumption that each rezoned areas would transition fully to the tree canopy coverage condition of the new zone during the study time horizon. The estimates provided are for the net tree loss projected in each action alternative compared to no action. It is correct as the comment states that the action alternatives would result in approximately 28% more residential growth than no action. However application of the rate of tree canopy loss estimated for the action alternatives can't be applied to the amount of residential growth under no action. The estimated amount of canopy loss under the action alternatives is for a complete conversion of those zoned areas to the tree canopy coverage condition of the new zone.

3. No analysis of loss of acreage that could be planted with trees.

The analysis at FEIS Exhibit 3.6-15 assumes that tree canopy coverage for all green spaces, which include parks, cemeteries, and

public and private schools, would remain constant even if rezoned. This is because green spaces are the most likely areas for increased planting of trees to increase canopy over the 20-year period. The methodology to estimate changes in canopy coverage is also inclusive of right of way areas within each zone, where tree planting and maturation could be expected. It would be speculative to predict other individual private parcels of land that could be acquired or reserved for tree planting in the future.

4. Need to evaluate a range of growth projections.

Growth estimates that are formally adopted as part of the Seattle 2035 Comprehensive Plan, which are derived from the formal growth estimations provided to cities and counties by the Washington State Office of Financial Management are used as the basis for growth estimates in Alternative 1. Please see Appendix G for discussion of growth estimates.

5. Suggestions for tracking of tree canopy loss and additional mitigation measures.

Thank you for your comments. Comments noted. Please see expanded discussion of mitigation measures in the FEIS including discussion of mitigations discussed in the comment letter.

Zerkowitz, Lisa

1. The comment document indicates concerns about potential impact to numerous elements of the environment, and inadequacies of DEIS analysis, related to the West Seattle Junction urban village and vicinity.

Please see response to Tobin-Presser, Christy-3, which addresses the comment document topics. Please also see frequent comment responses.

Zugschwerdt, Nancy

1. Concerns about unique environmentally sensitive conditions in South Park, and lack of specific analysis for the urban village.

Thank you for your comments. Comment noted. Please see frequent comment response concerning individual urban village analysis. Please see the Preferred Alternative map at Appendix H for South Park. Note that MHA implementation for South Park is proposed in the Preferred Alternative with the minimum increases necessary ((M) Tier rezones) to put the affordable housing requirement in place. This approach is the same as for areas outside of an urban village.



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4.4 RESPONSES TO VERBAL PUBLIC HEARING COMMENTS

Exhibit 4-4 Commenters Providing Comments by Verbal Public Hearing Comment

Last Name	First Name	Organization
Anderson	Ben	
Appelman	Ira	Eastlake Fair Growth
Barker	Deb	Morgan Community Association
Barnes	Kim	
Bates	Tawny	
Berner	Miranda	
Best	Brooke	Historic Seattle
Brookler	Megan	
Cocking	Penni	
Dlugosch	Deborah	
England	Kim	
Gould	Tim	
Guetta	Myani	Puget Sound Sage
Henry	Velma	
Honore	AJ	
Jaquith	Deb	Crown Hill Urban Village Committee for Smart Growth
Kirsh	Andrew	
Klatte	Phillip	
Koltreit	Berit	
Leman	Chris	
Lin	Susanna	Seattle Displacement Coalition
McCulloch	Garrett	
Momoda	Ron	
Pasciuto	Giulia	Puget Sound Sage
Prussing	MaryAnne	
Rees	Janine	
Richard	Marguerite	
Sawyer	Amanda	
Scarlett	Jennifer	

Exhibit 4-4 Commenters Providing Comments by Verbal
Public Hearing Comment (cont.)

Last Name	First Name	Organization
Thaler	Toby	
Trohomovich	Tim	Futurewise
Ward	David	
Ward	Susan	
Warouw	Ratna	Crown Hill Urban Village Committee for Smart Growth
Williams	Bonnie	
Williams	Natalie	
Zimmerman	Alex	

Anderson, Ben

1. **Supports Alternative 3 to provide more housing and growth in areas with higher access to opportunity.**

Comment noted. Thank you for your comment. Please see the Preferred Alternative.

Appelman, Ira (Eastlake Fair Growth)

1. **Concerning parking impacts and mitigation.**

Comment noted. Please see frequent comment response regarding parking impacts and mitigation. Please also see written comment response to Appelman, Ira.

2. **Concerning piecemeal approach.**

Comment noted. Please see frequent comment response regarding cumulative impacts.

Barker, Deb (Morgan Community Association)

1. **Extend the comment period.**

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

2. **Concerns about conflicts with the neighborhood plan.**

Comment noted. As noted in the EIS, a part of the proposed action is to docket amendments to certain neighborhood plan policies for amendment.

3. **Concerns that MHA affordable housing units would not be located in Morgan Junction.**

Comment noted. Please see frequent comment response concerning location of MHA affordable housing units.

4. **Supports Alternative 1.**

Comment noted.

Barnes, Kim

1. **Extend the comment period.**

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

2. Comments about how the social discourse of different alternatives is set up.

Comments noted. Please see response to written comment, Noah, Barbara-11 comment 1.

3. Need for capital and infrastructure investments in Westwood-Highland Park and other urban villages at the edges of the city.

Comments noted. Please see discussion in Section 3 including mitigation measures.

4. Prefers Alternative 1.

Comments noted.

Bates, Tawny

1. Extend the comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

2. Concern that rapid development in a localized areas would have greater impacts.

Comments noted. Please see response to written comment, Noah, Barbara-11 comment 1.

3. Relying on existing codes does not mitigate impacts.

Comments noted. Please see the FEIS Section 3.3 Aesthetics and Section 3.6 Biology and other sections for discussion of updates or revisions to codes that may provide mitigation of impact.

4. Analysis in certain areas is lacking.

Comments noted. Please see written comment response to Bates, Tawny-1.

Berner, Miranda

1. Extend the comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

Best, Brooke (Historic Seattle)

1. Background on Historic Seattle.

Comment noted. Thank you for commenting on the DEIS.

2. Concern about the lack of affordable housing.

Comments noted.

3. Older structures can provide affordable housing and commercial space.

Comments noted. Please see additional Section 3.5 Historic Resources, including addition of text concerning affordable rents in historic structures. See discussion of affordability in Section 3.1 Housing and Socioeconomics. Please see also response to written comment Woo, Eugenia.

4. Analysis of historic resources is inadequate.

Comments noted. Please see frequent comment response concerning historic resources. Please see also response to written comment Woo, Eugenia.

Brookler, Megan

1. Concerns about the affordability of housing in Crown Hill and potential displacement.

Comments noted. Please see discussion of direct, economic and cultural displacement in Section 3.1 Housing and Socioeconomics including additional analysis of potential economic displacement.

2. Consider incentives for development without displacement.

Comment noted. Please see mitigation measures concerning displacement in Section 3.1 Housing and Socioeconomics.

Cocking, Penni

1. Concerns about loss of trees and yards in South Park.

Comment noted. Please see response to written comment Cocking, Penni-8.

2. Prefers Alternative 1.

Comment noted. Please see the Preferred Alternative. In consideration of environmental constraints and other limitations in South Park, the Preferred Alternative would apply the minimum capacity increases necessary to implement MHA in South Park.

Dlugosch, Deborah

1. Assumptions regarding tree canopy coverage under the alternatives are wrong.

Comment noted. Please see response to written comment Kirsh, Andrew comment 1, and other comment responses in the written comment response to Kirsh, Andrew and to Early, Tom.

England, Kim

1. **The document downplays displacement effects. The analysis should look at various income bands.**

Comment noted. Please see Section 3.1 Housing and Socioeconomics including additional analysis of direct, economic, and cultural displacement in the FEIS. Please see additional correlations exploring the relationship between development and gain or loss of households at a range of income levels.

2. **The EIS should evaluate neighborhoods individually. A Neighborhood planning approach should be taken.**

Comment noted. Please see frequent comment response concerning individual urban village review.

3. **Analysis of demolition and replacement of housing isn't adequate and the potential for increased speculative activity.**

Comments noted. Please see estimations of demolition under all alternative in Section 3.1 Housing and Socioeconomics.

Gould, Tim

1. **Review the regional context. Denser development in Seattle will provide environmental benefits.**

Comment noted. Please see Section 3.9 Air Quality and Greenhouse Gas Emissions for discussion of greenhouse gas emissions under the alternatives.

2. **When looking at access to opportunity also look at investments needed to increase opportunity in low-access areas.**

Comment noted. Thank you for your comments. Please see Section 3.1 including additional mitigation measures discussed in the FEIS.

Guetta, Myani (Puget Sound Sage)

1. **Background on Puget Sound Sage.**

Thank you for your comments on the EIS.

2. **Center outcomes on displacement and ensure that communities most impacted by displacement are driving the policy solutions.**

Comments noted. Please see response to written comment Pasciuto, Guilia. Please see also frequent comment response concerning impacts on racial and cultural minority groups.

3. **Concern about the lack of analysis in the DEIS of cultural displacement.**

Comments noted. Please see expanded discussion of cultural displacement in Section 3.1 Housing and Socioeconomics, including additional mitigation measures.

Henry, Velma

1. Concern about displacement.

Comment noted. Please see discussion of direct, economic and cultural displacement in Section 3.1 Housing and Socioeconomics.

2. Prefers Alternative 3.

Comments noted.

Honore, AJ

1. Need more time. Extend the comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

2. Concern that the Mandatory Housing Affordability (MHA) is a giveaway for developers.

Comment noted. Please see frequent comment response concerning MHA affordable housing requirements. See also discussion in comment and response to Bertolet, Dan.

Comments noted.

Jaquith, Deb (Crown Hill Urban Village Committee for Smart Growth)

1. Concerning infrastructure investments to support growth in Crown Hill.

Comment noted. Please see frequent comment responses concerning stormwater and sanitary sewer infrastructure. Please See Section 3.4 Transportation. Please see Section 3.7 Open Space and Recreation, including additional discussion of mitigation measures in the FEIS. Please also see written comment response to Krueger, Ingrid-1.

2. DEIS does not consider development in the pipeline.

The growth estimates in the EIS consider pipeline development. Please see Appendix G for discussion of growth estimates.

3. Prefers Alternative 2 for Crown Hill.

Comment noted.

Kirsh, Andrew

1. Assumptions regarding tree canopy coverage under the alternatives are wrong.

Comment noted. Please see response to written comment Kirsh, Andrew comment 1.

2. Canopy is overestimated for Lowrise zones and other zones.

Comment noted. Please see response to written comment Kirsh, Andrew comment 4. And other written comment responses to Kirsh, Andrew.

Klatte, Phillip

1. Extend the comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

2. There is not enough analysis of the ability of single family homes to house more people.

Comment noted. Please see discussion in Section 3.1 Housing and Socioeconomics. See also written comment responses to Klatte, Phillip-4.

Koltreit, Berit

1. Concerns about defining quality of life.

Comments noted.

2. Concern about the amount of MHA requirements.

Comment noted. Please see frequent comment response concerning amount of the MHA affordable housing requirement.

Leman, Chris

1. Concerns about the community engagement process. It has been secret.

Comment noted. Please see frequent comment response concerning community engagement. Please see also Appendix B.

2. The EIS should evaluate neighborhoods individually. A Neighborhood planning approach should be taken.

Comment noted. Please see frequent comment response concerning individual urban village review.

3. MHA would only provide affordability to people who are at the lowest level of income. The middle class would be shut out.

Comment noted. MHA affordable housing units would primarily serve households earning 60 percent of Area Median Income (AMI) or below. However, see discussion of other aspects of housing affordability in Section 3.1 Housing and Socioeconomics.

4. There is nothing in the proposal to improve livability.

Comment noted. Please see mitigation measures in Chapter 3 sections including 3.2 Aesthetics, 3.3 Land Use, and 3.7 Open Space and Recreation.

Lin, Susanna (Seattle Displacement Coalition)

1. The DEIS does not include alternatives to MHA.

Comment noted. Please see frequent comment response concerning alternatives that could meet the objective.

2. Study higher MHA affordable housing requirements.

Comment noted. Please see frequent comment responses concerning MHA affordable housing requirements. Please see discussion in response to written comment, Bertolet, Dan.

3. Other suggestions to address housing affordability.

Comment noted. Please see frequent comment response concerning alternative that could meet the objective.

4. Impacts of cultural displacement are not looked at.

Comment noted. Please see expanded discussion of cultural displacement impacts in the FEIS.

McCulloch, Garrett

1. What will be the effect of the proposal on family-sized housing? Family sized housing is needed.

Comments noted. Please frequent comment response concerning family-friendly housing.

2. The action alternatives will do more to address housing affordability than no action.

Comment noted. Thank you for your comments.

Momoda, Ron

1. Prefers alternative 3 as it would apply to the Othello Urban Village, because it factors in consideration of displacement risk.

Comment noted. Thank you for your comments. Please see the Preferred Alternative in the FEIS, which includes aspects similar to Alternative 3.

Pasciuto, Giulia (Puget Sound Sage)

1. Limiting growth in areas with high displacement risk does not in and of itself mitigate displacement risk.

Comment noted. Please see the Preferred Alternative, which includes concepts described in the comment. Implementation of MHA requires increases to development capacity to put affordable housing requirements into effect. Therefore, the pattern and distribution of growth through choices about zoning designations are a key element of the proposed action. Please see also expanded discussion in the FEIS regarding cultural displacement, and expanded mitigation measures.

Please see also written comment response to Pasciuto, Giulia.

Prussing, MaryAnne

1. Concerns about the affordability of housing

Comments noted. Please see discussion of housing affordability in Section 3.1 Housing and Socioeconomics.

2. Concerns about traffic congestion on N. 45th St. and N. 50th St.

Comment noted. Please see Section 3.4 Transportation.

Rees, Janine

1. Extend the comment period.

Comments noted. The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

2. Concern relationship to other environmental review.

Please see frequent comment response concerning cumulative impacts.

3. Concern about lack of analysis in police, fire and schools. Concern about outdated information about schools.

Please see Section 3.8 public services and utilities. Please see expanded analysis of public schools capacity in the FEIS. Please see corrections to school names in the FEIS.

4. Comments regarding the Final EIS.

The FEIS indicates what has changed since the Draft EIS was published. There is a 14-day appeal period for appealing the adequacy of the Final EIS.

Richard, Marguerite

1. **Concern about housing affordability.**

Comments noted. Thank you for your comments.

Sawyer, Amanda

1. **Urban villages should have individual environmental review.**

Comment noted. Please see frequent comment response concerning individual urban village review.

2. **Mitigation measures do not seem achievable.**

Comment noted. Please see updated discussion of design review in FEIS Section 3.3 Aesthetics.

Scarlett, Jennifer

1. **Comments concerning community engagement.**

Comment noted. Please see Appendix B and frequent comment response concerning community engagement.

2. **Concern regarding use of TRAO data to gauge displacement impacts.**

Comment noted. Please see response to written comment Fox, John comment 5.

3. **Design review.**

Comment noted. Please see updated discussion of design review in Section 3.3 Aesthetics.

4. **Concerns about the amount of the MHA affordable housing requirement.**

Comment noted. Please see frequent comment response concerning the MHA affordable housing requirement amount.

Thaler, Toby

1. **Concern about the amount of the affordable housing requirements relative to the capacity increase.**

Comment noted. Please see frequent comment response concerning amount of the MHA affordable housing requirement.

2. **DEIS does not support how it will improve housing affordability for middle income people.**

Comments noted. Please see discussion in Section 3.1 Housing and Socioeconomics.

3. **Comment about inadequate community engagement.**

Comments noted. Please see Appendix B and frequent comment response concerning community engagement.

Trohomovich, Tim (Futurewise)

1. **Background on Futurewise, a statewide non-profit that works to make cities and towns great places to live, and to protect farms and forests.**

Thank you for commenting on the EIS.

2. **Include all areas within a 10-minute walk to frequent transit in urban villages in the preferred alternative.**

Comment noted. Please see the Preferred Alternative, which includes the requested feature.

Please see also response to written comments, Yadon, Bryce.

Ward, David

Please note that a hard copy comment was submitted by Mr. Ward, and is appended to these public hearing minutes. Responses to the hard copy comment begin at 7 below.

1. **Extend the comment period.**

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

2. **Consider more alternatives, and higher MHA requirements.**

Comment noted. Please see frequent comment responses concerning alternatives that could meet the objective and MHA affordable housing requirements.

3. **Include pipeline development.**

Comment noted. The growth estimates in the EIS reflect pipeline development.

4. **Baseline for analysis.**

Comments noted.

5. **New housing development is luxury housing.**

Comments noted. Please see discussion of housing affordability levels in Section 3.1 Housing and Socioeconomics.

6. **Assessment of impacts outside of urban villages.**

Comments noted. Please see response to written comment, Ward, David-5.

7. **Broader action alternatives should have been included. Higher MHA requirements should have been studied.**

Comments noted. Please see 2 above.

8. Suggests other housing strategies identified in the housing caucus report.

Comments noted. Please see frequent comment response concerning alternatives that could meet the objectives.

9. Include pipeline development in the analysis.

Comments noted. Growth estimates, which are the foundation for analysis of each alternative include pipeline development.

10. Determine the current situation. Various elements of the environment noted.

Comments noted. Please see the Affected Environment subsection of each Section in Chapter 3.

11. Luxury units.

Comments noted. Please see 5 above.

13. Affordability requirements for MFTE housing units expire after 12 years. What are the effects of expiration of those units.

See discussion of MFTE housing under subsidized housing at page 3.36, and 3.38 of the FEIS. Please note that MFTE units are considered in the analysis of economic displacement, but are not included as subsidized housing units due to their relatively shorter term of affordability. It is expected that housing produced using the MFTE would continue under all alternatives.

14. Transportation comments regarding long commutes.

Comments noted.

15. Comments regarding tree canopy.

Comments noted. Please see Section 3.6 biological resources.

16. Comments regarding use of decennial census data and ACS census data.

Comments noted. Best available data is used. There are limitations to ACS datasets. In some instances use of decennial census data provides more complete data, more accurate data, or historical data.

Ward, Susan

1. Opposes rezoning of a street in the Northgate urban village to Lowrise 2.

Comment noted. Thank you for your comment. Comment noted. Please see the Preferred Alternative, which would include MHA implementation with the Residential Small Lot zone designation, which would provide a transition at the edge of the urban village, and includes height limits and development standards more similar to the existing single family land use, than Alternative 2 for the block discussed in the comment.

Warouw, Ratna (Crown Hill Urban Village Committee for Smart Growth)

1. Concerning pedestrian safety.

Comment noted. Please See Section 3.4 Transportation.

2. For urban village expansion areas, villages with light rail should be treated differently from those with only bus service.

Comment noted. The urban villages studied for expansion are those considered in the Seattle 2035 Comprehensive Plan process. The criteria for very good transit service, is having frequent transit service to more than one additional urban village.

3. Concern about stormwater drainage and flooding.

Comment noted. Please see discussion in Section 3.8 Public Services and Utilities. Please see also frequent comment response concerning stormwater infrastructure.

See also written comment response to Krueger, Ingrid-1.

Williams, Bonnie

1. Extend the comment period.

The DEIS was published on June 8, 2017 with a 45-day comment period. A DEIS public open house and hearing was held on June 29, 2017. The comment period was extended an additional 15 days to August 7, 2017, for a total 60-day comment period.

2. Prefers Alternative 1.

Comment noted.

3. The upzones are a giveaway to developers.

Comment noted. Please see frequent comment response concerning MHA affordable housing requirements.

4. Concern about greater height bulk and scale. There is a need for family-sized homes.

Comment noted. Please see frequent comment response regarding family-friendly housing. Please also see Sections 3.2 Land Use and Section 3.3 Aesthetics.

Williams, Natalie

1. Inadequate assessment of shading and view impacts.

Comments noted. Please see response to written comment Bricklin, David-6. Please also see written response to written comment Noah, Barbara-17.

Zimmerman, Alex

Comments noted.

4.5 COMMENT E-MAILS, LETTERS, AND FORMS AND VERBAL PUBLIC HEARING TRANSCRIPT

The marked e-mails, letters, forms, and public hearing transcripts are available online at: <http://tinyurl.com/HALA-MHA-EIS>



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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.

5



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DISTRIBUTION LIST.

The Final EIS has been issued with a notice of availability and methods of publication required in SMC 25.05.510 Public Notice.

Tribal and Federal Agencies

Duwamish Tribe
 Muckleshoot Indian Tribe
 Suquamish Tribe
 Tulalip Tribes of Washington
 United Indians of all Tribes Foundation
 National Oceanic & Atmospheric Administration
 Fisheries, National Marine Fisheries Service
 U.S. Army Corp of Engineers
 U.S. Dept. of Agriculture, Wildlife Services Division
 U.S. Dept. of Ecology, Northwest Regional Office
 U.S. Dept. of Fish & Wildlife Services
 U.S. Dept. of Fish & Wildlife Services, EIS Reviews
 U.S. Dept. of Housing & Urban Development
 U.S. Environmental Protection Agency

Regional and County Agencies

King County Dept. of Design &
 Environmental Services
 King County Dept. of Natural
 Resources, Parks Division
 King County Dept. of Public Health
 King County Dept. of Transportation
 King County Executive's Office
 King County Housing & Community Development
 King County Land Use Services Division
 King County Metro Transit
 King County Regional Water Quality Committee
 King County Wastewater Treatment Division
 Port of Seattle Environmental Management
 Public Health—Seattle & King County
 Puget Sound Clean Air Agency
 Puget Sound Regional Council of Governments
 Sound Transit

State of Washington

Dept. of Archaeology & Historic Preservation

Dept. of Commerce, Growth Management Services

Dept. of Community Development

Dept. of Ecology

Dept. of Ecology, SEPA Unit

Dept. of Fish & Wildlife

Dept. of Health

Dept. of Natural Resources

Dept. of Social & Health Services

Dept. of Transportation

City of Seattle, Seattle Service Providers, Adjacent Cities

City of Seattle Dept. of Education & Early Learning

City of Seattle Dept. of Neighborhoods

City of Seattle Dept. of Neighborhoods,
Historic Preservation Program

City of Seattle Dept. of Parks & Recreation

City of Seattle Dept. of Transportation

City of Seattle Landmarks Preservation Board

City of Seattle Office of Emergency Management

City of Seattle Office of Housing

City of Seattle Office of Planning
& Community Development

City of Seattle Police Dept.

City of Seattle School District

Seattle City Council

Seattle City Light

Seattle Housing Authority

Seattle Indian Services Commission

Seattle Public Library, Public Review Documents

Seattle Public Utilities

City of Shoreline