

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.

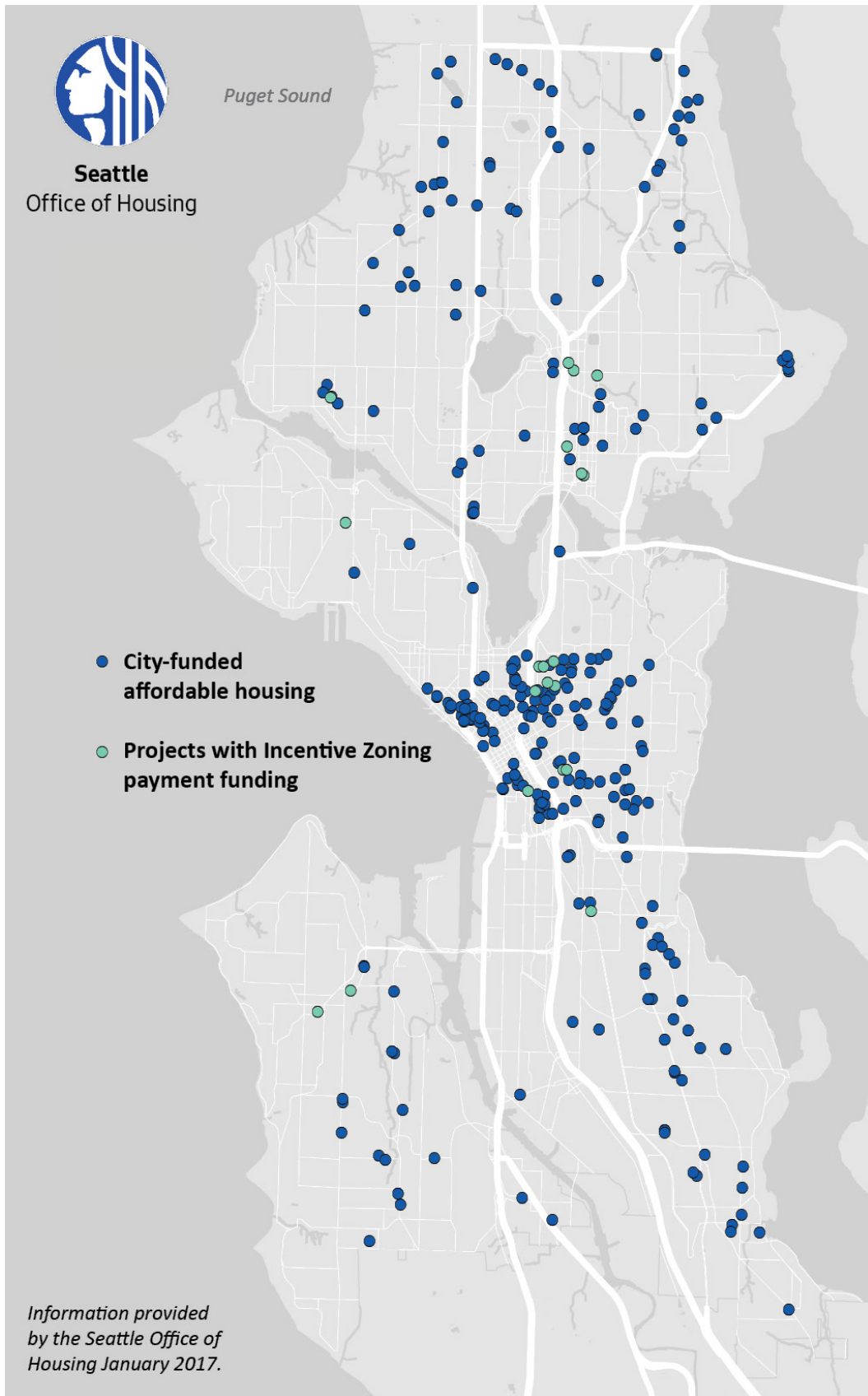


Exhibit 4-2
Rental Housing Program

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 measure 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.