

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 | | |
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| 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 | |
| Sellars | 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 socioeconomics 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 his 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.

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.

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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.

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 form 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 Fautleroy 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 Fautleroy 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.

Dubrulle, 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 a 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 cumulate 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 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 Krueger, 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, Hsuan

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.

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.

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 they 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 in 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 in 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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