

Mandatory Housing Affordability (MHA) Draft Environmental Impact Statement (DEIS)

Published 6/8

Open house and public hearing 6/29

Comments due 8/7

SPC meetings to discuss:

Full Commission meeting 6/22

Housing and Neighborhoods Meeting 7/6

Full Commission meeting 7/13

Action 7/27

Intent today:

Discuss observations and comments of Commissioner reviews,
frame comments for letter

MHA DEIS - overview

Alternatives

Alternative 1

No Action

Alternative 2

Incremental greater density of housing and employment in the same overall pattern and proportions identified in the Seattle 2035 Comprehensive Plan. Urban Village expansions to a 10 min walkshed of frequent transit

Alternative 3

Allocate more or less development capacity based on each urban village's relative level of displacement risk and access to opportunity, as identified in the Growth and Equity Analysis .

MHA DEIS - Housing and Socio Economics

Observations

Seattle is experiencing a growing gap in income levels; most growth is at the at low and high ends of income, resulting in a hollowing out of the middle-income populace ~60-80%AMI

Exhibit 3.1–26 Change in Number of Households by Income Level, 2000 compared to 2009–2013

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

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

MHA DEIS - Housing and Socio Economics

Observations

Most growth occurs in mixed use zones, not residential LR/RSL.

Exhibit 3.1–34 Percent of Total Net Capacity for Housing Growth by Zone Category

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

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

MHA DEIS - Housing and Socio Economics

Comments

- Areas near amenities have higher land costs; but housing near transit reduces transportation costs.
- How can a greater diversity of housing choices be produced?
- Displacement analysis should include impacts of and mitigation for eviction – a form of displacement

MHA DEIS - Housing and Socio Economics

Questions/Concerns

- Where do we put housing? Maximize housing in all areas, including high displacement risk areas (Alt. 2 and consistent with SPC May 15 MHA recommendation letter)
OR
build less housing in areas of high displacement risk (Alt. 3)?
- Should we limit capacity in the long-term to reduce displacement in short-term?
If so, how do we do that?
- Drawing conclusions based on analysis done with many assumptions is problematic
 - Using data from last census; not current building boom

MHA DEIS - Land Use

Comments

- Sizes of increase in urban villages is noted, but not much follow up on impacts of that growth
- Impacts to Urban Villages are addressed by Urban Village type (high displacement/low opportunity; Low displacement /low opportunity; high displacement/high opportunity; low displacement/high opportunity). A comparative table would be helpful – for instance acreage of expansion area in each alternative by urban village)
- Add a sense of scale; compare existing vs. growth – to compare relative growth. The no action alternative assumes growth – does not provide a baseline.

MHA DEIS - Aesthetics

- Increased shading may negatively impact users in the public right-of-way, especially in urban centers that already lack available open spaces. But, is shading measured—how much additional shading is created? Impact is too vague to confirm the impact of shading.
- Suggested modifications to Design Review thresholds and guidelines could potentially give current residents that do not wish to see additional housing in their community a tool to limit opportunities for more housing (by slowing down the approval process)—potentially decreasing opportunities for housing/racial equity.
- View corridors will be impacted, but by how much? Important to create distinction between protected views, and where those views are. Will these views actually be impacted? Important to clarify exactly where these view obstructions will occur, if at all.

MHA DEIS - Aesthetics

Other

Page 3.149 depicts massing comparisons at a height that pedestrians don't experience—this could amplify the potential impact more than what really might occur. Same with 3.151—show at ground level.



Exhibit 3.3-18
Transition Area,
No Action

Source: City of Seattle, 2017.



Exhibit 3.3-19
Transition Area,
Lowrise 1 (M1)
and Neighborhood
Commercial (M)
Infill Development

Source: City of Seattle, 2017.

MHA DEIS – Transportation

Observations

Essentially, congestion will get worse under any alternative
Larger impacts and congestion in south Seattle

Questions/Concerns

Is the Mitigation noted adequate and feasible? more buses; increase acceptable threshold

Comments

Since the no action alternative still looks at growth, it is hard to assess impacts absent a present day baseline

MHA DEIS – Historic Resources

Observations

Tools: Historic Districts, preservation, inventories of historic structures
However, inventory of historic resources is not complete

Questions/Concerns

Would historic districts freeze development and limit housing?

Comments

Underground Japanese bathhouse is just outside of the special review district and as such unprotected. Expansion of some historic review districts should be considered as mitigation. For example, C/ID

MHA DEIS – Biological Resources

Observations

Alt 2 is estimated to result in 5-11 acres loss of tree canopy, while Alt 3 is estimated to have a 8-16 acre loss of tree canopy

Questions/Concerns

Can non-developable land in the expansion areas (such as ECAs – ie wetlands, steep slopes, etc.) be considered open space?

MHA DEIS - Open Space and Recreation

- Overall, decrease in available park/open space per resident decreases racial equity, especially in urban centers already experiencing deficiencies under the 2011 and 2017 Parks Development Plan
- Page 3.290 identifies, *"In addition, there would also be an increased potential for impacts on parks and open space in urban villages served by current and future light rail transit as these parks and open spaces would become more accessible to people residing outside of the urban villages."* Concern is that current and future light rail doesn't connect to the largest parks and open spaces in the city, including the waterfront in West Seattle, Discovery Park, Washington Park Arboretum, Woodland Park, Seaward Park, Jefferson Park, Magnuson Park, etc.

MHA DEIS - Open Space and Recreation

- Those who are mobility-impaired, or are cost-burdened with transit passes may find it difficult to access parks within current and future light rail service. Creates additional burdens for those transiting with recreational gear or food, especially families hoping to use parks during the summer.
- Additional growth within urban villages could increase demand for additional park space in the next Parks Development Plan update.
- Are there other mitigation strategies?

MHA DEIS - Public Services and Utilities

Observations

- Chapter covers: Police services; Fire and emergency medical services; public schools; water, sewer and drainage systems; Seattle City Light. DEIS concludes MHA won't have impacts on these services. DEIS uses respective agency's internal strategic plan to measure against, does not critically analyze the plans.

Questions/Concerns

- School's plan only goes to 2022, compared to City's Comp Plan which plans to 2035. Demographics don't align
- Mitigation for increased enrollment numbers "SPS would need to adjust enrollment processes

MHA DEIS - Air Quality and Greenhouse Gas Emissions

Observations

Discusses distance from source that impacts health

Identifies 14 Urban Villages that are within 200m of pollution source

Questions/Concerns

Impact analysis focuses on construction impacts which are considered to be temporary.

Comments

Mitigation covers site specific strategies, but not overall zoning strategy

Makes assumption that fuel economy standards will improve

MHA DEIS

Overall comments

EIS often addresses impacts that will occur from the overall growth anticipated – 70,000, while MHA is only anticipated to generate 6000 (about 8.5% of total growth)

MHA DEIS - questions

1. Do we still stand by our position articulated in our May 15 letter that growth should be directed towards all high opportunity areas, even those with high risk of displacement?

If so, what mitigation measures should accompany growth in high displacement areas and does the DEIS cover them?

2. What factors should be considered in choosing the final alternative - one that will likely be a hybrid of Alternative 2 (evenly distribute growth) and Alternative 3 (focus growth in high opportunity/low displacement risk and not as much growth in high displacement risk areas)? Factors may include proximity to frequent transit, proximity to schools...

MHA DEIS – staff observations in relationship to May 15 SPC letter

SPC Recommendation 1:

Increase development capacity in areas across the city with high access to opportunity.

- Alt. 2 is anticipated to generate slightly more income restricted units than Alt 3. (4970 vs. 4934)

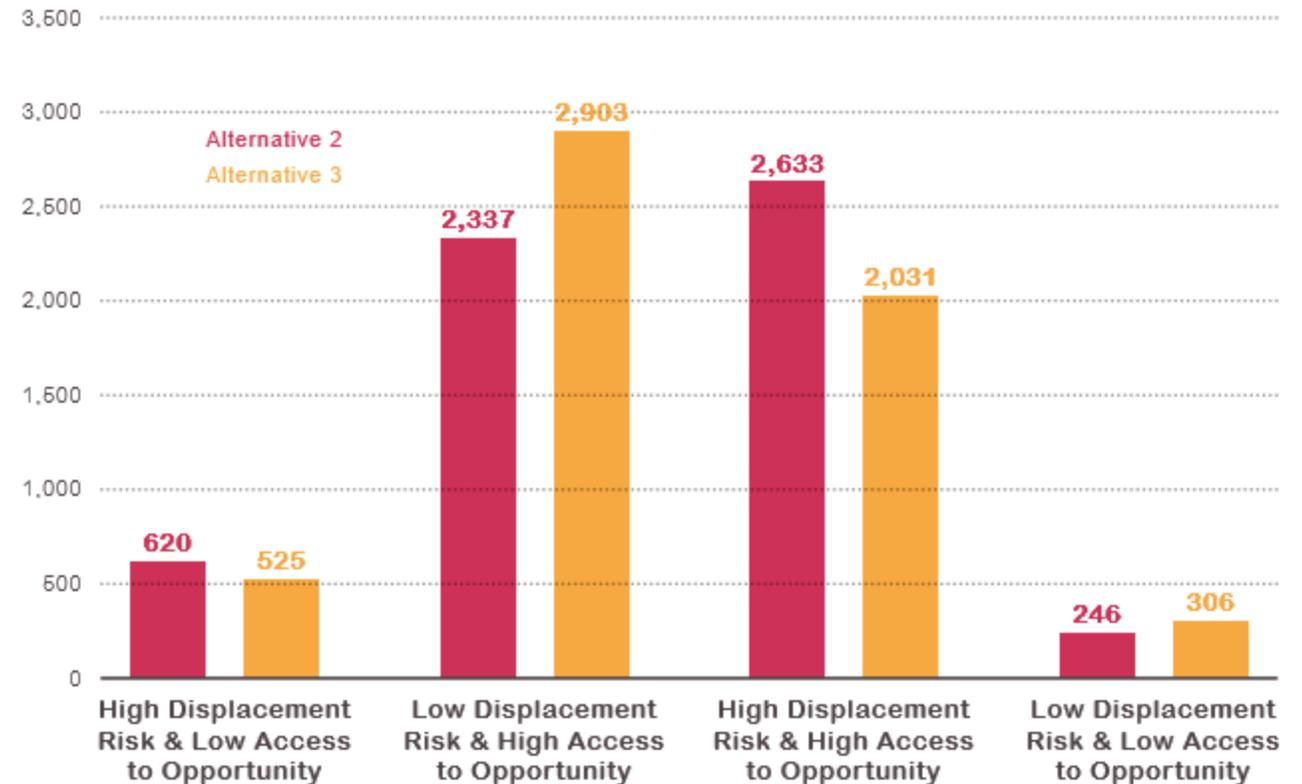


Exhibit 1-7 Income-Restricted Affordable Units Built

Source: City of Seattle, 2017.

MHA DEIS – staff observations in relationship to May 15 SPC letter

SPC Recommendation 2: Maximize growth capacity in areas with a high-risk of displacement...instead of seeking conservative rezones and boundary expansions.

- Alt. 2 uses 10-minute walksheds for all Urban Villages, while Alt. 3 uses 5 minute walksheds for Urban Villages with high displacement risk

MHA DEIS – staff observations in relationship to May 15 SPC letter

SPC Recommendation 3: In high risk of displacement areas, implement anti-displacement strategies instead of raising MHA requirements beyond what the market or intensity of rezones dictates.

- Consider additional mitigation: retention/growth of homeownership; incentivize performance through expedited Design Review or permitting; expand funding for EDI; city subsidies for ownership units; allow linking small development on several sites together MHA performance option is chosen, other?

MHA DEIS – staff observations in relationship to May 15 SPC letter

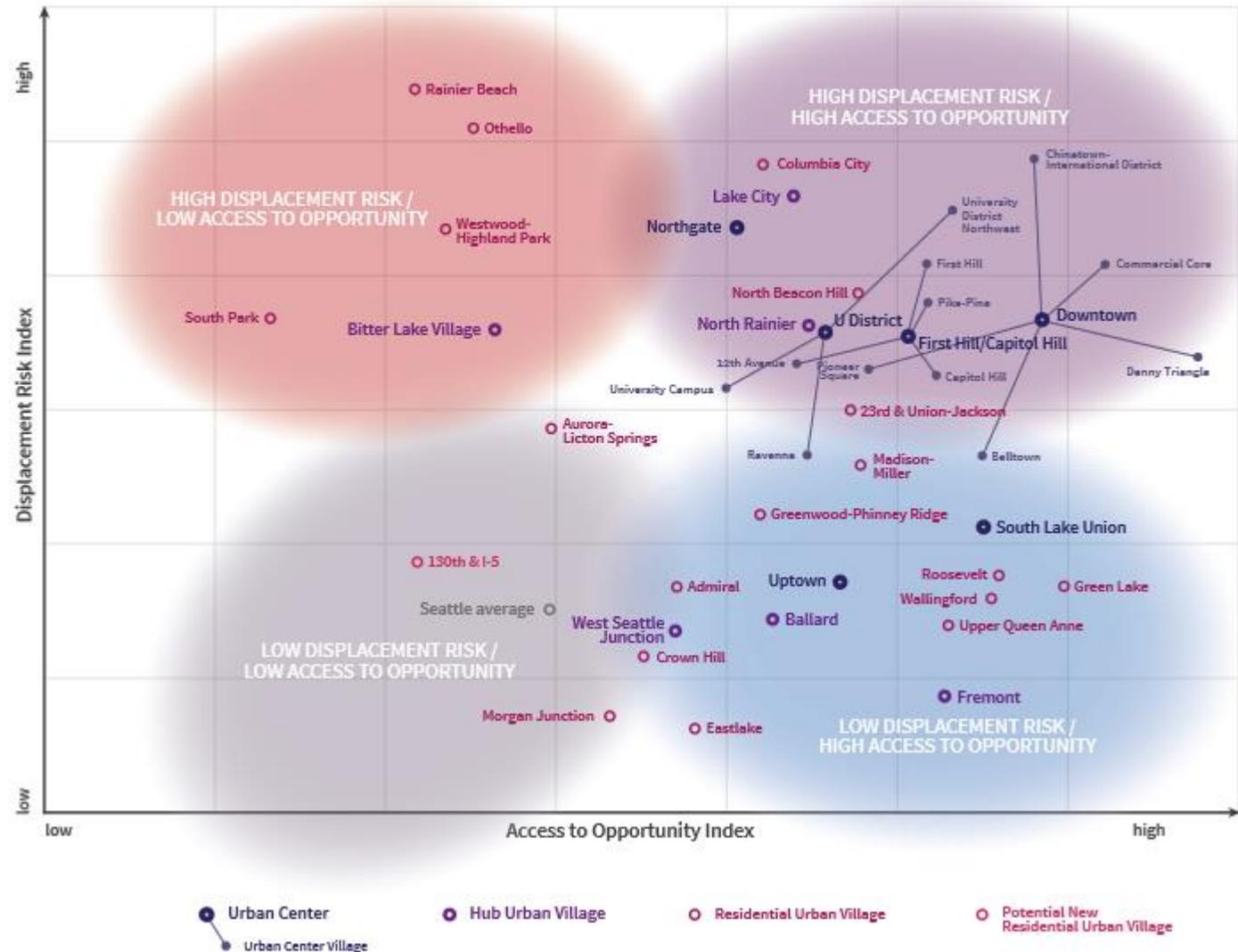
SPC Recommendation 5: Increase intensity of rezones around public investments such as schools, parks, community centers...etc.

- Not a zoning strategy used in developing the alternatives nor analyzed in DEIS, although one of the principles of MHA
- Consider: higher densities around transit, especially light rail. Such a consideration would require additional analysis in FEIS.

MHA DEIS - overview

From the
Growth and
Equity Analysis

Figure 7 Displacement Risk / Access to Opportunity Typology



MHA DEIS

Exhibit 2–10 Approach to MHA Development Capacity Increases, Alternative 3

Displacement Risk and Access to Opportunity	Intensity of Development Capacity Increases and Expansion of Urban Village Boundaries	Urban Villages
High Displacement Risk and Low Access to Opportunity	<p>Apply small development capacity increases resulting in a high proportion of MHA (M) designations, with limited instances of (M1), and no (M2) designations.</p> <p>Apply reduced urban village boundary expansions to a 5-minute walkshed or less from the frequent transit station.</p>	<ul style="list-style-type: none"> • Rainier Beach* • Othello* • Westwood–Highland Park • South Park • Bitter Lake
Low Displacement Risk and High Access to Opportunity	<p>Apply large development capacity increases, resulting in a high proportion of MHA (M1) and (M2) designations, along with some (M) designations.</p> <p>Apply full urban village boundary expansions to a 10-minute walkshed from the frequent transit station.</p>	<ul style="list-style-type: none"> • Green Lake • Roosevelt* • Wallingford • Upper Queen Anne • Fremont • Ballard* • Madison–Miller • Greenwood–Phinney Ridge • Eastlake • Admiral • West Seattle Junction* • Crown Hill* • Ravenna
High Displacement Risk and High Access to Opportunity	<p>Apply medium development capacity increases, resulting in a significant proportion of (M) zoning changes, but also resulting in some (M1) designations and limited instances of (M2) designations.</p> <p>Apply reduced urban village boundary expansions to a 5-minute walkshed or less from the frequent transit station.</p>	<ul style="list-style-type: none"> • Columbia City* • Lake City • Northgate • First Hill–Capitol Hill • North Beacon Hill* • North Rainier* • 23rd & Union–Jackson*
Low Displacement Risk and Low Access to Opportunity	<p>Apply medium development capacity increases, resulting in a significant proportion of (M) zoning changes, but also resulting in some (M1) designations and limited instances of (M2) designations.</p> <p>Apply full urban village boundary expansions to a 10-minute walkshed from the frequent transit station.</p>	<ul style="list-style-type: none"> • Aurora–Licton Springs • Morgan Junction

* Includes a proposed urban village expansion.

Source: City of Seattle, 2017.