

**SEATTLE CITY COUNCIL SEPA
ENVIRONMENTAL CHECKLIST**

This SEPA environmental review has been conducted in accord with the Washington State Environmental Policy Act (SEPA) (RCW 43.21C), State SEPA regulations [Washington Administrative Code (WAC) Chapter 197-11], and the City of Seattle SEPA ordinance SMC Chapter 25.05. The proposed action is considered a non-project action under SEPA. Non-project actions are broader than a single site-specific project (WAC 197-11-774, SMC 25.05.774). This type of non-project action is not categorically exempt from a SEPA Threshold Determination (SMC 25.05.305 and SMC 25.05.800); therefore, it must be analyzed to determine if there are probable significant adverse environmental impacts. The probable significant adverse environmental impacts analyzed in a non-project SEPA environmental checklist are those impacts foreseeable at this stage, before specific project actions are planned. The Seattle City Council's Central Staff has prepared this SEPA Environmental Checklist under the non-project provisions of SEPA. This checklist has been revised and updated for the purposes of renoticing the threshold determination. Changes from the checklist dated April 20, 2021 are shown in track-changes.

A. BACKGROUND**1. Name of proposed project:**

Mobile Home Park Overlay District (MHPOD)

2. Name of applicant:

Seattle City Council

3. Address and phone number of applicant and contact person:

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4. Date checklist prepared:

~~April 20, 2021~~ August 1, 2021

5. Agency requesting checklist:

Seattle City Council Central Staff

6. Proposed timing or schedule (including phasing, if applicable):

In January 2019, the City passed Ordinance 125764, which placed a one-year moratorium on redevelopment of mobile home parks and requested that the Office of Planning and Community Development propose a permanent land use regulatory framework for preserving existing mobile home parks. That temporary moratorium was extended for ~~three~~ four additional six-month periods through Ordinances 126006, 126090, ~~and~~ 126241, and 126362. The current moratorium will lapse in ~~July 2021~~ January 2022, unless it is extended. In May 2021, Council Bill 120079,

which would establish an MHPOD, was introduced and referred to the City Council's Land Use and Neighborhoods Committee. The City Council's Land Use and Neighborhoods Committee ~~is scheduled to consider~~ held a public hearing and discussed the MHPOD legislation in May 2021.

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain.

The proposal is a non-project action that is not dependent on any other current or future action.

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal.

While not directly related to this proposal, in 1984 the Seattle-King County Department of Public Health prepared a report and inventory of abandoned landfills. *Abandoned Landfill Study in the City of Seattle*, Seattle-King County Department of Public Health, July 30, 1984. The proposal site is located on a decommissioned landfill described in that report. See attached.

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain.

The proposal is a non-project action. There are no other applications pending for governmental approvals of other proposals directly affecting this proposal. Future public and private development projects may be subject to separate project-specific SEPA environmental review.

10. List any government approvals or permits that will be needed for your proposal, if known.

None known.

11. Give a brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page.

The MHPOD proposal would establish a new overlay district to preserve the remaining mobile home parks in the city. The overlay district would establish more restrictive development standards applicable to redevelopment of existing mobile home parks. Those standards would:

- Limit residential uses to mobile homes and mobile home parks;
- Establish minimum and maximum residential densities to allow for urban densities while ensuring adequate separation for light and air;
- Allow some commercial uses, consistent with the underlying commercial zone designation, but limit the size of those uses;
- Establish height and setback limitations that are consistent with ongoing mobile home park residential uses;
- Require the provision of residential amenity areas, such as outdoor or indoor recreational areas, when 25% or more of a site is redeveloped or undergoes a major renovation; and
- Provide for the expiration of the overlay in 30 years. ~~(For the purpose of the SEPA draft of the proposal the term of the overlay is 30 years. The disclosures in this checklist could apply to a term determined by the decision-makers to be between 10 and 50 years.)~~

The MHPOD proposal would also request that the Office of Housing add the census tract containing the overlay to those census tracts eligible for participation in the affirmative marketing and community preference policy adopted in the *City's Housing Funding Policies* (2019). Those policies provide opportunities for displaced residents to return to affordable housing in their prior neighborhood.

- 12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist.**

The geographic area affected by this proposed non-project action is approximately 11 acres in the Bitter Lake neighborhood, which contains the City's remaining two mobile home parks: Bella-Bee and Halcyon. The Halcyon Mobile Home Park is 7.6 acres, contains 76 homes, and is home primarily to seniors. The Bella Bee Park is 3.8 acres, contains 65 homes, and primarily houses families. (See Figure 1.) In both parks, residents own their mobile home but pay rent on the land.

The parks are zoned Commercial 1 – 55 with an M Mandatory Housing Affordability Suffix (C1 55 (M)). The parks are one block east of Aurora Ave N / SR 99 and located behind the former Lincoln Towing site and the Puetz Golf range. The Lincoln Towing site is proposed for redevelopment with 125 townhouses.

Figure 1 – Proposal Location



B. ENVIRONMENTAL ELEMENTS**1. Earth****a. General description of the site:**

The proposal site is generally flat and is developed with two, grade-separated mobile home parks. The proposal site is located above a decommissioned land fill.

b. What is the steepest slope on the site (approximate percent slope)?

Steep slope conditions vary considerably around the city. Steep slopes are mapped by the City's GIS, and development of designated steep slope Environmentally Critical Areas (ECAs) are regulated and protected by the adopted ECA Ordinance. The steepest slope located on the site is approximately 53-percent and is identified as a Steep Slope Erosion Hazard Environmentally Critical Area. The slope was created by grading associated with capping the abandoned landfill. The grading created two relatively flat terraces; the south terrace at a higher elevation than the north terrace, the two terraces are divided by the steep slope. Future development of steep slope ECAs in the MHPOD will be subject to the regulations of the ECA ordinance.

c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any agricultural land of long-term commercial significance and whether the proposal results in removing any of these soils.

Soil conditions vary considerably throughout the city and typically include a mix of glacial till found in the urban area. No agricultural soil or prime/unique farmland is present in the city. The site of the proposed MHPOD is characterized by a mix of landfill debris and artificial fill consistent with its former use as a landfill.

d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe:

There are areas within the city that feature and have a history of unstable soils. Due to the past use of the site as a landfill, the proposal site has a history of soil settlement that has been known to disrupt the foundations of mobile homes and street surfaces. The proposal site does not have a history of unstable soils associated with steep slopes. The proposal is not anticipated to increase the likelihood of ground disturbance beyond the present use or development allowed by current zoning.

e. Describe the purpose, type, total area, and approximate quantities and total affected area of any filling, excavation, and grading proposed. Indicate the source of fill.

The proposed non-project action does not include any construction or development that would require filling or grading.

f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe:

The proposed non-project action does not include any construction, development, or use that would cause erosion. Future, specific development proposals subject to the provisions of this proposal may involve clearing, construction, or uses that cause erosion. Potential impacts of future, specific development proposals would be addressed through regulations and/or project-specific environmental review as appropriate.

g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)?

The proposed non-project action does not include any construction or development that would convert pervious to impervious surfaces or create new impervious surfaces. Potential impacts of future, specific development proposals would be addressed through regulations and/or project specific environmental review as appropriate.

h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any:

The proposed non-project action does not involve construction activity and contains no proposed measures related to reducing or controlling erosion or other impacts at any specific location.

2. Air

a. What types of emissions to the air would result from the proposal [e.g., dust, automobile, odors, industrial wood smoke, greenhouse gases (GHG)] during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

The proposed non-project action does not include any construction or development that would directly produce emissions. Potential emission impacts of future, specific development proposals would be addressed through regulations and/or project specific environmental review as appropriate.

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe.

The proposed non-project action does not include any construction or development that would be affected by emissions or odors.

c. Proposed measures to reduce or control emissions or other impacts to air, if any:

No measures are proposed.

3. Water

a. Surface:

(1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If so, describe type and provide names. If appropriate, state what stream or river it flows into.

The proposed non-project action would occur within Seattle watersheds. The City of Seattle features freshwater lakes, streams, and saltwater bodies. Major bodies of water include Lake Washington, Lake Union, the Duwamish River, and Puget Sound. The site of the proposed rezone does not feature any surface water body within its boundary, however, Haller Lake is located approximately 1,000-feet to the east.

(2) Will the project require any workover, in, or adjacent to (within 200 feet) the described waters? If so, please describe, and attach available plans.

The proposed non-project action does not include any construction or development that would require work over, in, or adjacent to surface waters.

Potential impacts of future, specific development proposals would be addressed through regulations and/or project-specific environmental review as appropriate.

- (3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands, and indicate the area of the site that would be affected. Indicate the source of fill material.**

The proposed non-project action does not include any construction or development or any fill and dredge in or near surface waters or wetlands. Potential impacts of future, specific development proposals would be addressed through regulations and/or project specific environmental review as appropriate.

- (4) Will the proposal require surface water withdrawals or diversions? If so, give general description, purpose, and approximate quantities if known.**

Because this is a non-project action, there would be no construction or development that would withdraw or divert surface waters. Potential impacts of future, specific development proposals would be addressed through existing regulations and/or separate site-specific environmental review.

- (5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan.**

The proposal site is not located within a 100-year floodplain.

- (6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.**

The proposed non-project action does not include any construction or development that would discharge waste material to surface waters. Potential impacts of future, specific development proposals would be addressed through regulations and/or project-specific environmental review as appropriate.

b. Ground:

- (1) Will groundwater be withdrawn from a well for drinking water or other purposes? If so, give a general description of the well, proposed uses and approximate quantities withdrawn from the well. Will water be discharged to groundwater? Give general description, purpose, and approximate quantities if known.**

The proposed non-project action does not include any construction or development that would withdraw groundwater. Potential impacts of future, specific development proposals would be addressed through regulations and/or project-specific environmental review.

- (2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: domestic sewage; industrial, containing the following chemicals...; agricultural, etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve.**

The proposed non-project action does not include any construction or development that would discharge waste material to ground waters. Potential impacts of future, specific development proposals would be addressed through regulations and/or

project-specific environmental review.

c. Water Runoff (including storm water):

- (1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.**

The proposed non-project action does not include any construction or development that would generate runoff. Potential impacts of future, specific development proposals would be addressed through regulations and/or project-specific environmental review.

- (2) Could waste materials enter ground or surface waters? If so, generally describe.**

The proposed non-project action does not include any construction or development that would generate waste materials that could enter ground or surface waters. Potential impacts of future, specific development proposals would be addressed through regulations and/or project-specific environmental review.

- (3) Does the proposal alter or otherwise affect drainage patterns in the vicinity of the site? If so, describe.**

The proposed non-project action does not include any construction or development that would alter or otherwise affect drainage patterns.

d. Proposed measures to reduce or control surface, ground, runoff water, and drainage impacts, if any:

The proposed non-project action does not include any construction or development that would have impacts to surface, ground, runoff water, and drainage. No measures are proposed at this time. Potential impacts of future, specific development proposals would be addressed through regulations and/or project specific environmental review.

4. Plants

a. Types of vegetation found on the site: [check the applicable boxes]

A wide variety of native and non-native plant species and associated vegetation are found in the Seattle area. Generally, the Puget Sound basin is home to a wide diversity of plant species that depend upon marine, estuarine, freshwater, and terrestrial environments. The Seattle area has a broad variety of vegetation, including upland forest (deciduous, coniferous, and mixed), shrublands, riparian forests, and wetlands. This flora includes species native to the region, as well as many non-native species. Seattle is a densely developed urban area having few remaining areas of native vegetation and high-

quality habitat. These remaining fragments of quality native vegetation are found in parklands and open spaces. The plants found in most urban and suburban areas are those native and non-native species that tolerate or benefit from habitat degradation and disturbance.

<input checked="" type="checkbox"/> Deciduous trees:	<input checked="" type="checkbox"/> alder;	<input checked="" type="checkbox"/> maple;	<input checked="" type="checkbox"/> aspen;	<input checked="" type="checkbox"/> other: cottonwoods, willow, etc.
<input checked="" type="checkbox"/> Evergreen trees:	<input checked="" type="checkbox"/> fir;	<input checked="" type="checkbox"/> cedar;	<input checked="" type="checkbox"/> pine;	<input checked="" type="checkbox"/> other: spruce, hemlock, cedar, etc.
<input checked="" type="checkbox"/> Shrubs				
<input checked="" type="checkbox"/> Grass				
<input type="checkbox"/> Pasture				
<input type="checkbox"/> Crop or grain				
<input type="checkbox"/> Orchards, vineyards, or other permanent crops				
<input checked="" type="checkbox"/> Wet soil plants:	<input checked="" type="checkbox"/> cattail;	<input checked="" type="checkbox"/> buttercup;	<input checked="" type="checkbox"/> bulrush;	<input checked="" type="checkbox"/> skunk cabbage; <input type="checkbox"/> other:
<input checked="" type="checkbox"/> Water plants:	<input checked="" type="checkbox"/> water lily	<input checked="" type="checkbox"/> eelgrass	<input checked="" type="checkbox"/> milfoil	<input type="checkbox"/> other: (identify)
<input checked="" type="checkbox"/> Other types of vegetation:	Various other vascular, non-vascular, native, and non-native plant species.			

b. What kind and amount of vegetation will be removed or altered?

The proposed non-project action does not include any construction or development that would remove or alter vegetation. Potential impacts of future, specific development proposals would be addressed through regulations and/or project-specific environmental review.

c. List threatened or endangered species known to be on or near the site.

No federally-listed endangered or threatened plant species or State-listed sensitive plant species are known to occur within the proposal site. Most of the Seattle area has been intensively disturbed by development and redevelopment over the last 100 years. Seattle’s original vegetation has been extensively cleared, excavated, filled, paved, or occupied by streets and other built structures.

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any:

No landscaping or other measures are proposed at this time. Potential impacts of future, specific development proposals would be addressed through regulations and/or project specific environmental review.

e. List all noxious weeds and invasive species known to be on or near the site.

Many species of noxious and invasive species are found within King County and the City of Seattle and may exist on the proposal site. See, for example, the noxious weed lists of the King County Noxious Weed Board (<http://www.kingcounty.gov/services/environment/animals-and-plants/noxious-weeds/laws/list.aspx>).

5. Animals

a. List any birds and other animals that have been observed on or near the site or are known to be on or near the site: [check the applicable boxes]

Many species of birds, mammals, and fish are present. Generally, the Puget Sound basin is home to an extremely wide diversity of animal species that depend upon marine, estuarine, freshwater, and terrestrial environments. This fauna includes species native to the region, as well as many non-native species. The Seattle area is an intensely developed urban area having few remaining areas of native vegetation and high-quality habitat. These remaining fragments of quality wildlife habitat are found in parklands and open spaces throughout the city. The wildlife found in most urban areas are those native and non-native species that tolerate or benefit from habitat degradation or close association with humans.

Birds: Hawk Heron Eagle Songbirds
 Other: osprey, bald eagle, peregrine falcon, purple martin, owl (various species), pileated woodpecker, belted kingfisher, waterfowl species, Canada goose. Also, typical urban species associated with urban development such as starling and pigeon.

Mammals: Deer Bear Elk Beaver
 Other: California sea lion, river otter, muskrat, raccoon. Also, a variety of urban-adapted species such as possum and rat.

Fish: Bass Salmon Trout Herring
 Shellfish Other: perch, rockfish, etc.

b. List any threatened or endangered species known to be on or near the site:

In King County, five wildlife species are listed as endangered or threatened under the Endangered Species Act (ESA), but these species are not likely to be found in the Seattle Direct Water Service Area. These include Canada lynx (*Lynx Canadensis*; Threatened), gray wolf (*Canis lupus*; Endangered), grizzly bear (*Ursus arctos*; Endangered), marbled murrelet (*Brachyramphus marmoratus*; Threatened), and northern spotted owl (*Strix occidentalis caurina*; Threatened). King County contains federally designated critical habitat for marbled murrelet and northern spotted owl; no designated critical habitat is located in Seattle. Bald eagle (*Haliaeetus leucocephalus*) was removed from the federal list under ESA on August 8, 2007, but is federally protected under the Bald and Golden Eagle Protection Act. Bald eagles are known to reside in Seattle.

Fish species listed as endangered or threatened under the ESA and found in freshwater tributaries of Puget Sound (PS) include Chinook salmon (*Oncorhynchus tshawytscha*, Threatened, PS), steelhead (*O. mykiss*, Threatened, PS), and bull trout (*Salvelinus confluentus*, Threatened, PS). Coho salmon (*O. kisutch*) is a Candidate species for listing as Threatened. Lake Washington contains federally designated critical habitat for bull trout and Chinook salmon. Because much of Seattle has been previously developed and the original habitats significantly altered or eliminated, the potential for threatened or endangered animal species to be present in Seattle is low.

c. Is the site part of a migration route? If so, explain.

The Puget Sound region is known to be an important migratory route for many animal species. Portions of the city provide migratory corridors for bald eagles traveling to and from foraging areas in Puget Sound or Lake Washington. Marbled murrelets travel through the planning area between marine waters and their nests in late successional/old growth forests in the Cascade Mountains. Bull trout, steelhead, and Chinook, chum, pink, and coho salmon use the Puget Sound nearshore. Chinook, coho, and sockeye salmon use Lake Washington and Lake Union as migration corridors. Anadromous trout and salmon migrate through the area river and stream systems, including urban streams in Seattle. The Puget Sound region is also within the Pacific Flyway—a flight corridor for migrating waterfowl, migratory songbirds, and other birds. The Pacific Flyway extends from Alaska to Mexico and South America.

d. Proposed measures to preserve or enhance wildlife, if any:

No measures to preserve or enhance wildlife are proposed.

e. List any invasive animal species known to be on or near the site.

Many species of invasive animal species are found within King County and the City of Seattle, including nutria (*Myocastor coypus*), rat (*Rattus* spp.), pigeon (*Columba livia*), New Zealand Mud Snail (*Potamopyrgus antipodarum*), and Asian gypsy moth (*Lymantria dispar*).

6. Energy and Natural Resources

a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc.

The proposed non-project action does not include any construction or development that would require energy to operate. Potential impacts of future, specific development proposals would be addressed through regulations and/or project-specific environmental review.

b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe.

The proposed non-project action does not include any construction or development that would affect potential use of solar energy by adjacent properties. Potential impacts of future, specific development proposals would be addressed through regulations and/or project-specific environmental review.

c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any:

The proposed non-project action does not include any energy conservation features or other measures to reduce or control energy impacts. Potential impacts of future, specific

development proposals would be addressed through regulations and/or project-specific environmental review.

7. Environmental Health

- a. **Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe:**

The proposed non-project action does not include any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste. Potential impacts of future, specific development proposals would be addressed through regulations and/or project-specific environmental review.

The proposal site was operated as a landfill from approximately 1954 to 1957. After closure, the site was leveled and capped with soil. Methane gas is produced from the decomposition of landfill debris. Methane is a non-toxic flammable gas that can explode when present in the air at concentrations of 4-18% by volume. In the 1984 Abandoned Landfill Study in the City of Seattle, 3 of 17 bore holes around the site were observed with methane gas within or above the explosive range. Vent pipes were previously observed to be on site. Methane can also present an explosion hazard within 1,000-feet of a landfill. Methane can migrate laterally underground, this can occur via utility pipes, and accumulate in pockets inside and outside of landfill boundaries. There is also risk of the presence of hydrogen sulfide gas. The non-project action is not anticipated to increase the likelihood of ground disturbance or chance of encountering environmental health hazards beyond the present use or development allowed by current zoning.

- (1) **Describe any known or possible contamination at the site from present or past uses.**

The proposed non-project action does not include any construction or other activities that would encounter possible site contamination. Potential impacts of future, specific development proposals would be addressed through regulations and/or project-specific environmental review.

- (2) **Describe existing hazardous chemicals/conditions that might affect project development and design. This includes underground hazardous liquid and gas transmission pipelines located within the project area and in the vicinity.**

The proposed non-project action does not include any construction or other activity that would cause exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste. Potential impacts of future, specific development proposals would be addressed through regulations and/or project-specific environmental review.

- (3) **Describe any toxic or hazardous chemicals that might be stored, used, or produced during the project's development or construction, or at any time during the operating life of the project.**

The proposed non-project action does not involve the storage, use, or production of toxic or hazardous chemicals. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review.

(4) Describe special emergency services that might be required.

The proposed non-project action does not require any special emergency services. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review.

(5) Proposed measures to reduce or control environmental health hazards, if any:

This non-project action does not involve any development activity that will result in any environmental health hazards necessitating mitigation measures. Future development that is subject to the provisions of this proposal will be subject to the City's codes and ordinances, and subsequent environmental review will occur if thresholds are exceeded. Future development undergoing environmental review will be required to demonstrate adherence with Model Toxics Control Act (MTCA) provisions and compliance with the Washington State Department of Ecology regulatory authority.

Due to the past use as a landfill, future development at the site will also be subject to Seattle-King County Health Department requirements for the submittal of an excavation and development work plan, prepared by a licensed engineer with landfill experience. Additional requirements include compliance with the Seattle Building Code to prevent damage from methane gas, subsidence and earthquake-induced ground shaking, and submittal of technical studies that address any threats to proposed development associated with the former use as a landfill. Methane barriers or appropriate ventilation may be required, and any utility lines leaving the site will be sealed to prevent it from becoming a pathway for gas migration.

Future development at the site will be evaluated on a project by project basis. The proposed MHPOD is not anticipated to increase the likelihood of ground disturbance or chance of encountering environmental health hazards beyond the present use or development allowed by current zoning.

b. Noise

(1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)?

The proposed non-project action would not be affected by noise. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review.

(2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site.

The proposed non-project action does not include any construction or development that would generate noise. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review.

(3) Proposed measures to reduce or control noise impacts, if any:

Because the proposed non-project action would not itself generate noise, no measures to reduce or control noise are proposed. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review.

8. Land and Shoreline Use

- a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.**

There are two mobile home parks in the proposal area: the Halcyon Mobile Home Park and the Bella-Bee Mobile Home Park. The proposal would encourage continued use of the area as mobile home parks until the overlay lapses.

C1 zoning with an equal or greater height limit is adjacent to the site to the west and north. Potential land uses would be compatible with the allowed uses to the west and north of the site. To the east of the site zoning is Single Family zoning, and the east edge of the site is the boundary of the Bitter Lake Urban Village. Use incompatibilities could result if higher intensity commercial uses are constructed at the east periphery of the site under the C1 55 (M) zone. Potential incompatibilities would be incrementally more severe than under existing conditions. Potential land use impacts of the C1 55 (M) zone were evaluated in the MHA EIS and were found not to be significant for this area.

- b. Has the project site been used as working farmlands or working forest lands? If so, describe. How much agricultural or forest land of long-term commercial significance will be converted to other uses as a result of the proposal, if any? If resource lands have not been designated, how many acres in farmland or forest land tax status will be converted to nonfarm or nonforest use?**

The proposed non-project action would not convert agricultural or forest land to other uses. There are no designated agricultural or forest lands in Seattle.

- c. Will the proposal affect or be affected by surrounding working farm or forest land normal business operations, such as oversize equipment access, the application of pesticides, tilling, and harvesting? If so, how?**

The proposed non-project action would not affect or be affected by agricultural or forest land business operations. There are no designated agricultural or forest lands in Seattle.

- d. Describe any structures on the site.**

There are 76 mobile homes in the Halcyon Mobile Home Park and 65 mobile homes in the Bella-Bee Park. Most of the mobile homes date to the early to mid 1960s. Many are in a condition that would render them too damaged to move. There is also a clubhouse / community center in the Halcyon Mobile Home Park.

- e. Will any structures be demolished? If so, what?**

The proposed non-project action does not include demolition of any structures. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review.

- f. What is the current zoning classification of the site?**

Commercial 1 – 55 with an M Mandatory Housing Affordability Suffix (C1 55 (M)).

- g. What is the current comprehensive plan designation of the site?**

The current designation is urban village. The area is within the Bitter Lake / Haller Lake Hub

Urban Village.

h. If applicable, what is the current shoreline master program designation of the site?

Not applicable.

i. Has any part of the site been classified as an “environmentally critical” area? If so, specify.

The site is the location of a former landfill. It is classified as a historical landfill site. The site also contains two areas of isolated steep slopes that were created due to grading at the southwest and the northeast edges of the Halcyon Mobile Home Park.

j. Approximately how many people would reside or work in the completed project?

This is a non-project action and no development is proposed. There are currently 141 mobile/manufactured homes in the area of the proposal. The expected effect of the legislation is to encourage continued use as a mobile/manufactured home park with the current number of homes being maintained for a period of time. A limited amount of commercial use could be added to the site, which could provide employment.

k. Approximately how many people would the completed project displace?

No people would be displaced by the proposed non-project action. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review.

l. Proposed measures to avoid or reduce displacement impacts, if any:

The proposal is intended to encourage continued use as a mobile home park with the current number of homes being maintained. It is anticipated that existing owners of the mobile home parks would continue operation.

The City has a relocation plan requirement for redevelopment of mobile home parks. In 1990, the Council enacted a new Chapter of the municipal code to regulate mobile home park redevelopment. Those regulations require preparation of a relocation plan and a relocation process that must be followed before a park is redeveloped. City of Seattle Relocation Plan Ordinance (SMC Chapter 22.904)

The State of Washington mobile and manufactured home relocation assistance program provides funds to eligible low-income households with incomes up to 80 percent of area median income. In the 2018 legislative session the State made substantial changes to the program to make it more useful. If an eventual development proposal comes forward, the existing mobile home resident relocation assistance programs would mitigate displacement impacts.

Finally, the proposal requests that the Office of Housing add the census tract with the proposal site to those tracts eligible for participation in the affirmative marketing and community preference policy adopted in the City’s *Housing Funding Policies* (2019). Those policies provide opportunities for displaced residents to return to affordable housing in their prior neighborhood.

m. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any:

The area is within the Bitter Lake Hub Urban Village. The proposal includes a minimum

and maximum density of mobile homes to encourage compact use of land with housing. Both the MHPOD and C1-55 (M) zone are compatible with land use plans and policies for an urban village location. The C1 zone allows for a broad range of commercial and residential land uses.

n. Proposed measures to reduce or control impacts to agricultural and forest lands of long-term commercial significance, if any:

There are no designated agricultural or forest lands in Seattle.

9. Housing

a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing.

The proposed non-project action would not provide housing. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review.

b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing.

This non-project action would help preserve existing homes for lower-income households. Although the exact incomes and rent levels of residents in the existing mobile home parks are not known, it is estimated that a significant proportion of the existing residents are moderate to low income households.

c. Proposed measures to reduce or control housing impacts, if any:

No measures to reduce or control housing impacts are proposed. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review. See 8l, above.

10. Aesthetics

a. What is the tallest height of any proposed structure(s), not including antennas? What is the principal exterior building material(s) proposed?

The proposed non-project action does not include construction or development. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review.

b. What views in the immediate vicinity would be altered or obstructed?

The proposed non-project action would not alter or obstruct views. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review.

c. Proposed measures to reduce or control aesthetic impacts, if any:

No measures to reduce or control aesthetic impacts are proposed.

11. Light and Glare

a. What type of light or glare will the proposal produce? What time of day would it mainly occur?

The proposed non-project action does not include construction or development that would produce light or glare. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review.

b. Could light or glare from the finished project be a safety hazard or interfere with views?

The proposed non-project action does not include construction or development that would produce light or glare. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review.

c. What existing off-site sources of light or glare may affect your proposal?

Light or glare would not affect the proposed non-project action. Potential impacts of light or glare on future, specific development proposals would be addressed through separate project-specific environmental review.

d. Proposed measures to reduce or control light and glare impacts, if any:

No measures to reduce or control light and glare are proposed.

12. Recreation

a. What designated and informal recreational opportunities are in the immediate vicinity?

There is a private golf driving range to the west of the site. Haller Lake Park is located approximately 900 feet to the east of the site. There is a private community club house and swimming pool within the existing Halcyon Mobile Home Park.

b. Would the proposed project displace any existing recreational uses? If so, describe.

The proposed non-project action does not include construction or development that would displace any recreational activities. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any:

The proposal includes standards for an open space / community space requirement, if a mobile home park is redeveloped. These standards ensure that new open spaces or community spaces would be included in any future redevelopment.

13. Historic and Cultural Preservation

a. Are there any buildings, structures, or sites, located on or near the site that are over 45 years old listed in or eligible for listing in national, state, or local preservation registers? If so, specifically describe.

No buildings or structures are listed or eligible for listing in a national, state or local preservation register on the site or on adjacent sites.

- b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources.**

An abandoned landfill study was prepared for The City of Seattle, Seattle-King County Public Health in 1984. The study identifies the types of refuse thought to be dumped on the site when it was operated as a dump. It is not expected that the garbage contains any materials of cultural importance.

- c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the Department of Archaeology and Historic Preservation, archaeological surveys, historic maps, GIS data, etc.**

The proposed non-project action does not involve construction or disturbance of any site. No methods were used to assess potential impacts to cultural and historic resources. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review.

- d. Proposed measures to avoid, minimize, or compensate for loss, changes to, and disturbance to resources. Please include plans for the above and any permits that may be required.**

The proposed non-project action does not include construction or development, so there are no activities that would require the avoidance, minimization, or compensation for loss, changes to, and disturbance to historic and cultural resources. Individual projects developed pursuant to the provisions of this proposal would be subject to environmental review (if they meet or exceed thresholds for environmental review) and to the State of Washington's and City's regulations related to the protection of historic and cultural resources.

14. Transportation

- a. Identify public streets and highways serving the site or affected geographic area, and describe proposed access to the existing street system. Show on site plans, if any.**

The site is bordered by Stone Ave. N. (west), N 125th St. (north), and Ashworth Ave. N. (east). The existing Halcyon Mobile home park is access by one driveway via Stone Ave. N., and the Bella-Bee mobile home park is accessed via three curb cuts directly onto N. 125th St. Street improvements on Stone Ave. N. stop at the entrance to the Halcyon Mobile Home Park, and through traffic is not allowed on Ashworth Ave. N. past the southern corner of the Bella-Bee mobile home park.

- b. Is the site or affected geographic area currently served by public transit? If so, generally describe. If not, what is the approximate distance to the nearest transit stop?**

A bus stop for Rapid Ride Route E is located on Aurora Ave. N. at the intersection of N 125th St. - approximately 700 feet from the site. King County Metro bus routes 316, 345, and 346 are located on Densmore Ave. approximately 350 feet from the site to the east.

- c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate?**

The proposed non-project action would not construct parking spaces. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review.

- d. Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).**

The proposed non-project action does not require any improvements to roads or other transportation infrastructure. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review.

- e. Will the project or proposal use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe.**

No.

- f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and non-passenger vehicles). What data or transportation models were used to make these estimates?**

The proposed non-project action would not generate vehicle trips. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review.

- g. Will the proposal interfere with, affect or be affected by the movement of agricultural and forest products on roads or streets in the area? If so, generally describe.**

No.

- h. Proposed measures to reduce or control transportation impacts, if any:**

No measures to reduce or control transportation impacts are proposed.

15. Public Services

- a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe.**

The proposed non-project action would not result in an increased need for public services. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review.

- b. Proposed measures to reduce or control direct impacts on public services, if any.**

No measures to reduce or control direct impacts on public services are proposed.

16. Utilities

- a. Check utilities available at the site, if any: [check the applicable boxes]**

- | | | | | |
|---|---|--|--------------------------------|---|
| <input type="checkbox"/> None | <input type="checkbox"/> Electricity | <input type="checkbox"/> Natural gas | <input type="checkbox"/> Water | <input type="checkbox"/> Refuse service |
| <input type="checkbox"/> Telephone | <input type="checkbox"/> Sanitary sewer | <input type="checkbox"/> Septic system | | |
| <input type="checkbox"/> Other (identify) | | | | |

All major utility services currently service the site. At the time of a project proposal needed improvements and connections to utility lines would be evaluated.

- b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed.**

None

The proposed non-project action does not include construction or development of any utilities.

C. SIGNATURE

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: *Ketil Freeman*
Ketil Freeman, AICP
Legislative Analyst

Note: Section *D. Supplemental Sheet for Non-Project Actions* is required if the proposal applies to a program, planning document, or code change.

D. SUPPLEMENTAL SHEET FOR NON-PROJECT ACTIONS

(Do not use this sheet for project actions)

Because these questions are very general, it may be helpful to read them in conjunction with the list of the elements of the environment.

When answering these questions, be aware of the extent the proposal, or the types of activities likely to result from the proposal, would affect the item at a greater intensity or at a faster rate than if the proposal were not implemented. Respond briefly and in general terms.

1. How would the proposal be likely to increase discharge to water; emissions to air; production, storage, or release of toxic or hazardous substances; or production of noise?

The proposal would not result in direct impacts and is unlikely to result in indirect or cumulative impacts related to discharges to water; emissions to air; production, storage, release of toxic or hazardous substances; or production of noise or greenhouse gas (GHG) emissions. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review.

Proposed measures to avoid or reduce such increases are:

The proposal does not produce such increases. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review.

2. How would the proposal be likely to affect plants, animals, fish, or marine life?

The proposal would result in no direct impacts and is unlikely to result in indirect or cumulative impacts related to plants, animals, fish or marine life.

Proposed measures to protect or conserve plants, animals, fish, or marine life are:

The proposal does not include such measures. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review.

3. How would the proposal be likely to deplete energy or natural resources?

The proposal would not deplete energy or natural resources.

Proposed measures to protect or conserve energy and natural resources are:

The proposal would not have a negative impact on energy or natural resources; therefore, no protective measures are proposed. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review.

4. How would the proposal be likely to use or affect environmentally sensitive areas or areas designated (or eligible or under study) for governmental protection; such as parks, wilderness, wild and scenic rivers, threatened or endangered species habitat, historic or cultural sites, wetlands, floodplains, or prime farmlands?

The proposal would not have a negative impact on environmentally sensitive areas.

Proposed measures to protect such resources or to avoid or reduce impacts are:

The proposal would not have a negative impact on environmentally sensitive areas; therefore, no protective measures are proposed. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review.

5. How would the proposal be likely to affect land and shoreline use, including whether it would allow or encourage land or shoreline uses incompatible with existing plans?

The proposal would result in no long-term direct impacts and is unlikely to result in indirect or cumulative impacts related to land or shoreline use. The proposal would encourage land use consistent with the City of Seattle Comprehensive Plan. The area is designated as an urban village on the future land use map and is within the Bitter Lake Hub Urban Village. Urban villages are prioritized as areas to receive growth in the plan. The land use designation calls for a range of allowable housing and employment uses in urban villages that are conducive to service by transit and have the potential to be compact walkable urban neighborhoods.

The proposal contains a minimum and maximum density for mobile home park redevelopment. After the MHPOD lapses redevelopment could occur in the C1 55 (M) zone to a maximum height of 55 feet. The C1 zone allows for a range of commercial and residential uses at an urban density consistent with an urban village designation.

The site is located at the east edge of the urban village, bordering single family neighborhoods to the east. After the MHPOD lapses, there could be an abrupt transition between allowed uses and development scales at the C1 55 zone (M) and the adjacent single-family neighborhood. The land use impact of this configuration was evaluated in the MHA EIS in the land use section, and no significant adverse impact was found.

Proposed measures to avoid or reduce shoreline and land use impacts are:

The C1 55 (M) zone includes setback requirements where abutting the single-family zone. For portions of a structure above 13 feet in height the required setback is 15 feet, and there is an additional setback requirement of 3 feet for every 10 feet of height for each portion of the structure above 40 feet. The code required setback provides a stepped transition to the single-family zoned area.

6. How would the proposal be likely to increase demands on transportation or public services and utilities?

The proposal would have no direct impact on the demands on transportation or the need for public services or utilities.

Proposed measures to reduce or respond to such demand(s) are:

No measures are proposed to reduce the demands on transportation, public services and utilities. Potential impacts of future, specific development proposals would be addressed through regulations and/or separate project-specific environmental review.



- 7. Identify, if possible, whether the proposal may conflict with local, state, or federal laws or requirements for the protection of the environment.**

There are no known conflicts or additional requirements.