# **SEPA<sup>1</sup> Environmental Checklist**

# **Purpose of checklist**

Governmental agencies use this checklist to help determine whether the environmental impacts of your proposal are significant. This information is also helpful to determine if available avoidance, minimization, or compensatory mitigation measures will address the probable significant impacts or if an environmental impact statement will be prepared to further analyze the proposal.

# Instructions for applicants

This environmental checklist asks you to describe some basic information about your proposal. Please answer each question accurately and carefully, to the best of your knowledge. You may need to consult with an agency specialist or private consultant for some questions. You may use "not applicable" or "does not apply" only when you can explain why it does not apply and not when the answer is unknown. You may also attach or incorporate by reference additional studies reports. Complete and accurate answers to these questions often avoid delays with the SEPA process as well as later in the decision-making process.

The checklist questions apply to **all parts of your proposal**, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

# Instructions for lead agencies

Please adjust the format of this template as needed. Additional information may be necessary to evaluate the existing environment, all interrelated aspects of the proposal and an analysis of adverse impacts. The checklist is considered the first but not necessarily the only source of information needed to make an adequate threshold determination. Once a threshold determination is made, the lead agency is responsible for the completeness and accuracy of the checklist and other supporting documents.

# Use of checklist for nonproject proposals

For nonproject proposals (such as ordinances, regulations, plans and programs), complete the applicable parts of sections A and B, plus the Supplemental Sheet for Nonproject Actions (Part D). Please completely answer all questions that apply and note that the words "project," "applicant," and "property or site" should be read as "proposal," "proponent," and "affected geographic area," respectively. The lead agency may exclude (for non-projects) questions in "Part B: Environmental Elements" that do not contribute meaningfully to the analysis of the proposal.

<sup>&</sup>lt;sup>1</sup> https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/Checklist-guidance

# A.Background

#### 1. Name of proposed project, if applicable:

Zoning Code Text Amendment: Manufactured Home Park Overlay zone

#### 2. Name of applicant:

City of Sumner

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

1104 Maple Street

Sumner, WA 98390

#### 4. Date checklist prepared:

06-02-2025

#### 5. Agency requesting checklist:

City of Sumner

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

Planning Commission Public Hearing, July 10, 2025 Planning Commission Recommendation, August 2025 City Council adoption of Ordinance, Fall 2025

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

No

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

2024 Comprehensive Plan Periodic Update Draft EIS, March 2024 and Final EIS, January 2025

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.

None

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

Council approval of ordinance with Zoning Code text amendments.

11. Give 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. (Lead agencies may modify this form to include additional specific information on project description.)

The Zoning Code text amendment would create a Manufactured Home Park (MHP) overlay district that would limit the future use of the land to being only a MHP. The Zoning Code Text amendments would do the following:

A. Specify that a MHP is the only allowed use in the overlay and would only apply to MHPs existing prior to January 1, 2025. New MHPs would be exempt.

B. Creates an option for owners of MHPs to apply for a use exception if the overlay zone prevents reasonable use of the property or it is not economically viable. Displacement provisions would be available for residents if the MHP ceased to exist.

C. Allows for residents of the mobile home park to apply to the City for a Mobile Home Park Overlay Zone if the residents become vulnerable to displacement.

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 following existing manufactured home parks inclusive of all associated parcels, shall be designated on the official Zoning Map per SMC 18.06.020 as Manufactured Home Park Overlay Zones:

- 1. Crystal Springs Mobile Home Park: 15708 52ND STREET E. SUMNER, WA 98390
- 2. Double A Mobile Manor: 4903 EAST VALLEY HWY E SUMNER, WA 98390
- 3. Summerville Estates: 5506 VAN TASSEL RD E SUMNER, WA 98390

## **B.Environmental Elements**

- 1. Earth
  - a. General description of the site:

Circle or highlight one: Flat, rolling, hilly, steep slopes, mountainous, other:

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

Existing MHP sites are relatively flat and not located within any landslides hazard areas

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.

This is a non-project action and does not directly involve development.

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

This is a non-project action and does not directly involve development.

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

This is a non-project action and does not directly involve development.

f. Could erosion occur because of clearing, construction, or use? If so, generally describe.

This is a non-project action and does not directly involve development.

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

This is a non-project action and does not directly involve development.

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

This is a non-project action and does not directly involve development.

#### 2. Air

a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate quantities if known.

This is a non-project action and does not directly involve development.

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

This is a non-project action and does not directly involve development.

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

This is a non-project action and does not directly involve development.

#### 3. Water

#### a. Surface:

 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 yes, describe type and provide names. If appropriate, state what stream or river it flows into. No. This is a non-project action and does not directly involve development.

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

No. This is a non-project action and does not directly involve development.

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.

This is a non-project action and does not directly involve development.

4. Will the proposal require surface water withdrawals or diversions? Give a general description, purpose, and approximate quantities if known.

This is a non-project action and does not directly involve development.

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

No

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.

This is a non-project action and does not directly involve development.

#### 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 a general description, purpose, and approximate quantities if known.

This is a non-project action and does not directly involve development.

2. Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (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.

This is a non-project action and does not directly involve development.

#### c. Water Runoff (including stormwater):

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.

This is a non-project action and does not directly involve development.

#### 2. Could waste materials enter ground or surface waters? If so, generally describe.

This is a non-project action and does not directly involve development.

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

This is a non-project action and does not directly involve development.

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

This is a non-project action and does not directly involve development.

#### 4. Plants

- a. Check the types of vegetation found on the site:
  - ⊠ deciduous tree: alder, maple, aspen, other
  - **vergreen tree: fir, cedar, pine, other**

Shrubs

- $\boxtimes$  grass
- □ pasture
- □ crop or grain
- □ orchards, vineyards, or other permanent crops.
- □ wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
- □ water plants: water lily, eelgrass, milfoil, other
- $\Box$  other types of vegetation
- b. What kind and amount of vegetation will be removed or altered?

This is a non-project action and does not directly involve development.

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

This is a non-project action and does not directly involve development.

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

This is a non-project action and does not directly involve development.

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

This is a non-project action and does not directly involve development.

#### 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.

Examples include:

- Birds: hawk, heron, eagle, <u>songbirds</u>, other:
- Mammals: deer, bear, elk, beaver, other:
- Fish: bass, salmon, trout, herring, shellfish, other:

This is a non-project action and does not directly involve development.

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

This is a non-project action and does not directly involve development.

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

The City of Sumner lies within the Pacific Flyway migration route for birds.

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

This is a non-project action and does not directly involve development.

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

This is a non-project action and does not directly involve development.

#### 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. This is a non-project action and does not directly involve development.

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

This is a non-project action and does not directly involve development.

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.

This is a non-project action and does not directly involve development.

#### 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 because of this proposal? If so, describe.

This is a non-project action and does not directly involve development.

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

This is a non-project action and does not directly involve development.

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.

This is a non-project action and does not directly involve development.

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.

This is a non-project action and does not directly involve development.

#### 4. Describe special emergency services that might be required.

This is a non-project action and does not directly involve development.

#### 5. Proposed measures to reduce or control environmental health hazards, if any.

This is a non-project action and does not directly involve development.

#### b. Noise

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

This is a non-project action and does not directly involve development.

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)?

This is a non-project action and does not directly involve development.

#### 3. Proposed measures to reduce or control noise impacts, if any:

This is a non-project action and does not directly involve development.

#### 8. Land and shoreline use

Find help answering land and shoreline use questions<sup>2</sup>

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.

The sites to which the proposed MHP overlay would apply are currently operating as manufactured home parks. Adjacent uses vary by location but generally include residential including single family residential development and multi-family developments, neighborhood commercial uses, and/or open space uses. The overlay would not apply to vacant land or new development areas.

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 because 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?

Some existing manufactured home parks may have been historically used for agriculture; however, they have been developed and operating as residential MHPs for several years or decades. No new conversion of agricultural land is proposed under this overlay.

1. 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?

No, this is a non-project action and does not directly involve construction or development.

<sup>&</sup>lt;sup>2</sup> https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-8-Land-shoreline-use

#### c. Describe any structures on the site.

Sites affected by the overlay contain structures typically found in manufactured home parks, including manufactured homes, community facilities, storage buildings, utility infrastructure, and internal roadways. No new construction is proposed by the overlay itself.

#### d. Will any structures be demolished? If so, what?

No structures are proposed to be demolished as part of this overlay. The overlay is regulatory in nature and applies to existing uses only.

#### e. What is the current zoning classification of the site?

The zoning of the MHP sites varies to include low-density residential (LDR-6 and LDR-8.5) and high-density residential (HDR) zones. The overlay would be applied in addition to the existing zoning and would limit allowed uses to existing manufactured home parks as of January 1, 2025.

#### f. What is the current comprehensive plan designation of the site?

The comprehensive plan designation of the affected MHP sites varies but corresponds with residential land uses. The overlay is consistent with the underlying comprehensive plan designation by preserving existing affordable residential use.

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

The proposed overlay does not apply to areas within shoreline jurisdiction. Therefore, the shoreline master program designation is not applicable.

# h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

Some existing manufactured home parks may include or be adjacent to mapped critical areas such as wetlands or floodplains. The proposed overlay does not permit new development or physical expansion of the MHPs, and therefore would not impact critical areas.

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

Because the overlay only applies to existing MHPs and does not authorize new development, the resident population is expected to remain consistent. No new residents or workers are anticipated as a result of the overlay itself

#### j. Approximately how many people would the completed project displace?

None. The overlay aims to preserve existing manufactured home parks by preventing incompatible uses or redevelopment. No displacement will occur as a result of the proposed overlay.

#### k. Proposed measures to avoid or reduce displacement impacts, if any.

The overlay itself is a displacement avoidance measure. By ensuring that only existing MHPs can continue to operate within the designated overlay, it preserves affordable

housing and prevents conversion to other land uses that could displace current residents.

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

The overlay supports the long-term preservation of manufactured home parks, consistent with local comprehensive plan goals to maintain affordable housing. The overlay is limited to existing MHPs and prohibits new uses that could create land use conflicts, helping ensure compatibility with adjacent development patterns.

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

None, there are no agricultural and forest lands within the vicinity of MHPs and are not impacted by the overlay.

## 9. Housing

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

This is a non-project action and does not directly involve construction of any new housing units.

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

This is a non-project action and does not directly involve construction or displacement.

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

The MHP overlay itself is a displacement avoidance measure. By ensuring that only existing MHPs can continue to operate within the designated overlay, it preserves affordable housing and prevents conversion to other land uses that could displace current residents.

## **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?

MHP developments are typically 1-story, approximately 13.5 feet.

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

No views within the vicinity of MHPs are altered under this non-project action.

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

This is a non-project action and does not directly involve construction.

### 11. Light and glare

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

This is a non-project action and does not directly involve construction

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

This is a non-project action and does not directly involve construction

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

This is a non-project action and does not directly involve construction

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

None proposed as this is a non-project action with no new construction.

#### 12. Recreation

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

The designated and informal recreational opportunities near the existing MHPs vary depending on location, but may include public parks, trails, community centers, open space areas, and neighborhood playgrounds. Some manufactured home parks also contain on-site recreational amenities such as picnic areas or clubhouses for resident use.

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

No. The proposed overlay would not displace any existing recreational uses. In fact, by preserving existing manufactured home parks, it helps maintain continued access to any recreational amenities within those parks and protects nearby public resources from increased development pressure.

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

No new recreation-related impacts are anticipated from this proposal. The overlay does not allow for physical expansion or new development. It is a preservation-oriented zoning mechanism, and therefore no new recreation facilities are proposed or required. The overlay may indirectly reduce impacts on public recreational resources by maintaining residential density and preventing more intensive land uses.

#### **13. Historic and cultural preservation**

Find help answering historic and cultural preservation questions<sup>3</sup>

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.

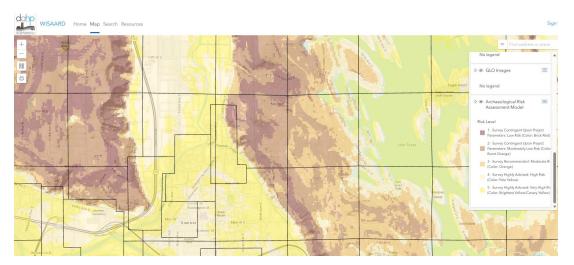
No, however additional information may be needed to understand how preservation of MHP could create eligible sites.

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.

None known

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 archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc.

Reference to DAHP's database on archaeological risk assessment model to determine that existing MHP sites in Sumner are designated as 'survey is highly advised (yellow)':



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.

This is a non-project action and does not directly involve construction. Preservation of MHPs through the proposed overlay could potentially avoid underground disturbances to archeological resources, if any exist.

<sup>&</sup>lt;sup>3</sup> https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-13-Historic-cultural-p

## 14. Transportation

Find help with answering transportation questions<sup>4</sup>

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.

Existing Manufactured Home parks in Sumner are served by the following streets:

- East Valley Highway is a two- to three-lane minor arterial serving the northeast part of the city.
- Elm Street is classified as a two-lane collector arterial between Wood and Valley Avenues and between East Valley Highway and 160th Avenue E.
- 160th Avenue E is a two-lane, north-south roadway that serves as a collector between Elm Street and 64th Street E. The posted speed limit is 25 mph.



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?

No, public transit is not available in Sumner neighborhoods currently.

<sup>&</sup>lt;sup>4</sup> https://ecology.wa.gov/Regulations-Permits/SEPA/Environmental-review/SEPA-guidance/SEPA-checklist-guidance/SEPA-Checklist-Section-B-Environmental-elements/Environmental-elements-14-Transportation

c. 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).

No, this is a non-project action that does not directly involve construction or new development.

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

No, this is a non-project action ad does not directly involve construction.

e. 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 nonpassenger vehicles). What data or transportation models were used to make these estimates?

The proposed overlay would maintain existing trips generated within MHPs.

f. 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, this is a non-project action

g. Proposed measures to reduce or control transportation impacts, if any:

Preservation of affordable housing is a part of Sumner's Housing Action Plan. With an overlay protecting MHPs, it could encourage the need for more accessible transportation options for vulnerable populations. No new measures are needed to control existing traffic patterns for MHP.

#### **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.

No, the proposed overlay does not displace or create any new MHPs that would require the need for increase in public services.

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

None proposed, this is a no-project action

#### 16. Utilities

 a. Circle utilities currently available at the site: electricity, natural gas, water, refuse service, telephone, sanitary sewer, septic system, other: 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 are proposed, this is a non-project action. Existing MHP will maintain the current utilities as highlighted above in question 16.a.

# 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.

Ch 20 **X**:

Type name of signee: Chrissanda Walker

Position and agency/organization: Associate Planner, City of Sumner

#### Date submitted: 06/05/2025

# **D.Supplemental sheet for nonproject actions**

Find help for the nonproject actions worksheet<sup>5</sup>

**Do not** use this section 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?

Proposed Manufacture Home Park (MHP) overlay zone would not increase discharge to water, emissions to air or the production, storage or release of toxic or hazardous substances because the MHPs are existing. The production of noise would remain the same as permissible within residential zones.

• Proposed measures to avoid or reduce such increases are:

To prevent increase in noise beyond what is permissible in residential zones, the city would respond to noise complaints and pursue code enforcement as needed.

<sup>&</sup>lt;sup>5</sup> https://ecology.wa.gov/regulations-permits/sepa/environmental-review/sepa-guidance/sepa-checklist-guidance/sepa-checklist-section-d-non-project-actions

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

The proposed MHP overlay will have not have any adverse effect on plants, animals or marine life. This is a non-project action that does not involve construction or new development.

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

There are none proposed.

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

The proposed overlay is not likely to deplete energy or natural resources, as it does not involve new construction, infrastructure extension, or increase in density or intensity of use. It supports continued use of existing infrastructure and helps prevent resource demands associated with redevelopment

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

By preserving existing residential uses and discouraging redevelopment into more energy-intensive uses, the overlay may indirectly support long-term energy conservation goals.

# 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 overlay may indirectly reduce impacts on environmentally sensitive areas by maintaining existing residential density and preventing more intensive land uses.

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

The draft Ordinance address and limit expansions of new manufactured-homes within the MHPs, where adjacent to critical or sensitive areas.

# 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 overlay supports the long-term preservation of manufactured home parks, consistent with local comprehensive plan goals to maintain affordable housing. The overlay would immediately apply over existing MHPs and will prohibit new uses that could create land use conflicts, helping ensure compatibility with adjacent development patterns.

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

The Manufactured Home Park Zone Overlay will apply to existing MHP, not located within shorelines. The MHP overlay applies to low, medium and/or high-density residential zones only, compatible with existing and adjacent land uses. There are limits on the development to manufactured home parks unless an exception is granted.

The overlay may indirectly reduce impacts on **shoreline and land use** by maintaining residential density and preventing more intensive land uses.

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

No. The Manufactured Home Park Overlay Zone would not increase the number of units or population in the area.

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

None proposed currently.

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

The proposed MHP overlay zone does not conflict with local, state of federal law or conflicts with requirements for the protection of the environment.